



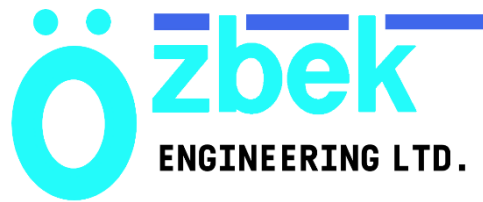
KASTAMONU

Drinking Water Distribution Network and Sewerage Network
Projects under TEFWER

Stakeholder Engagement Plan



October 2024



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LIST OF ABBREVIATIONS

| | |
|--------------|---|
| AFAD | : Disaster and Emergency Management Presidency |
| Başkent EDAŞ | : Başkent Electricity Distribution Corporation |
| CİMER | : Presidency's Communication Center |
| CL | : Crepine Level |
| CSO | : Civil Society Organization |
| DRM | :Disaster Risk Management |
| E&S | : Environmental and Social |
| EIA | : Environmental Impact Assessment |
| ESF | : Environmental and Social Framework |
| ESMF | : Environmental and Social Management Framework |
| FI | : Financial Intermediary |
| GM | : Grievance Mechanism |
| ILBANK | : İller Bankası A.Ş |
| İMED | : Firefighters Assistance Association |
| IPL | : Inlet Pipe Level |
| İŞKUR | : Turkish Employment Agency |
| KM | : Kastamonu Municipality |
| LMP | : Labor Management Procedures |
| MoEUCC | : Ministry of Environment, Urbanisation and Climate Change |
| NTS | : Non-Technical Summary |
| OHS | : Occupational Health and Safety |
| OIPs | : Other Interested Parties |
| PTT | : Post, Telegraph and Telephone Administration |
| RF | : Resettlement Framework |
| SEP | : Stakeholder Engagement Plan |
| DSI | : General Directorate of State Hydraulic Works |
| TEFWER | : Türkiye Earthquake, Floods and Wildfires Emergency Reconstruction |
| TİBDER | : All Firefighters Association |
| TMMOB | : Türkiye Engineer and Architect Chambers |
| WB | : World Bank |
| YİMER | : Foreigners Communication Center |

1 Introduction

Floods, wildfires, storms, and landslides are frequent events in Türkiye and result in localized losses. Observed and anticipated climate change impacts, such as more intense precipitation, extreme heat and rising sea level, are expected to lead to increasing risks to natural disasters, including more frequent and intense flooding in low-lying areas of river deltas and coastal cities and other extreme weather events, such as storms, hail, and tornadoes. Long term sustainable growth in Türkiye requires a reduction in the physical, social, and economic shocks associated with geophysical and climate change-induced disasters.

The World Bank has been a leading partner in the thematic areas of Disaster Risk Management (DRM) and urban development in Türkiye for many years. Türkiye Earthquake, Floods and Wildfires Emergency Reconstruction (TEFWER) Project has been developed by the participation of İller Bankası A.Ş (İLBANK) and World Bank (WB) to support municipalities to undertake urgent repairs, structural strengthening, and if needed demolition/reconstruction, rehabilitation, or new construction of damaged municipal owned infrastructure and to put in place measures aimed at increasing disaster preparedness and climate adaptation.

TEFWER Project responds the immediate and most critical reconstruction and rehabilitation needs from recent wildfires, floods and earthquakes, while also proactively tackling urgent measures required to build resilience to disaster and climate risks which are growing in frequency and intensity. İLBANK as an incorporated, non-deposit-taking development and investment bank provides financial resources to municipalities and will act as financial intermediary (FI) in this Project.

There are four components under TEFWER Project, which are:

Component 1: Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience: Under this component, there are five subcomponents which are related to (1.a) reducing urban flooding through investment in resilient and climate-change sensitive stormwater systems, (1.b) increasing emergency response capacity within municipalities for flood, wildfire and other disasters, (1.c) restoring and improving resilience of water and wastewater services, (1.d) resilience of transport and evacuation routes and (1.e) capability building activities for municipalities.

Component 2: Technical Assistance to Support Green, Resilient and Inclusive Cities: Under this component, there are three subcomponent, including (2.a) assessment of disasters and climate threats in the Project municipalities and development of guidelines and policy recommendations for supporting the integration into city strategic and spatial plans, (2.b) preparation of resilience strategies, investment planning and public awareness, and (2.c) increasing capacity of engineering, architecture and other relevant municipal professionals.

Component 3: Project Management and Operations

Component 4: Contingent Emergency Response Component

Kastamonu Drinking Water Distribution Network and Sewerage Network Projects (the Project) will be financed within the scope of Subcomponent 1.c of TEFWER Project. The networks are aged and need to be renewed. The pipes currently used have been damaged over time due to their material (asbestos, concrete, iron, etc.).

This SEP includes the identification of stakeholders, the planned consultation activities, and the engagement process. This SEP is prepared in compliance with WB Environmental and Social

Framework (ESF), Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) of ILBANK prepared for TEFWER Project and Turkish legislation.

This SEP aims to establish and maintain a dialogue between Kastamonu Municipality and the stakeholders, project affected communities, and groups of interest to successfully manage the environmental and social (E&S) impacts/risks for the construction and operation phases of the Project.

Thereby, the SEP enhances the implementation of the Environmental and Social Management Plan (ESMP), by considering the stakeholders' concerns.

1.1 Subproject Description and Activities

The scope of Kastamonu Drinking Water Distribution Network and Sewerage Network Projects is divided into two separate component. Component 1 consists entirely of the drinking water network. There are drinking water reservoirs. There will be no new reservoir construction within the scope of the project.

Component 2 consists entirely of the sewerage network. There are no structures such as pumping stations within the scope of the sewerage network. It consists only of network lines.

Potential environmental and social risks and impacts have been assessed in detail in the Environmental and Social Management Plan (ESMP). Mitigation measures proposed to avoid, minimize, or compensate for impacts arising from these activities are identified in ESMP¹. Please refer the ESMP for the Project details.

1.2 Component-1 – Kastamonu (Central) Drinking Water Network Project

“Kastamonu Municipality (Central) Drinking Water Network Hydraulic Modelling and Application Project” report was prepared by Mestcon Consulting, Engineering and Trade Ltd. Co. after tendered by the Kastamonu Municipality in October 2021.

For construction purposes, there has been a need to revise some parts of the approved projects as a basis of implementation. In this context, the Revision of Drinking and Sewerage Project in Kastamonu (Central) Partial Neighborhoods was tendered by Kastamonu Municipality and carried out by the Özbek Engineering Ltd. Co.

The project does not envisage the renewal of the entire city network. Within the scope of finance, the parts that need to be renewed by the municipality have been determined by taking into account the needs of the city.

The Drinking Water Network Project (Component 1) is planned to be built in Akmesit, Akteke, Saraçlar, Budamiş, İsfendiyer, Beyçelesi, Yavuz Selim, Atabeygazi, Hisarardi, Hepkebirler, Honsalar, İsmailbey, Topçular, Esentepe, Mehmet Akif, Candaroğlu, İnönü, Cebrail and Kırçeşme, Neighbourhoods of Central District of Kastamonu Province. The details of the Component 1 of the project have been provided in the Environmental and Social Management Plan (ESMP).

¹ The link will be provided when available

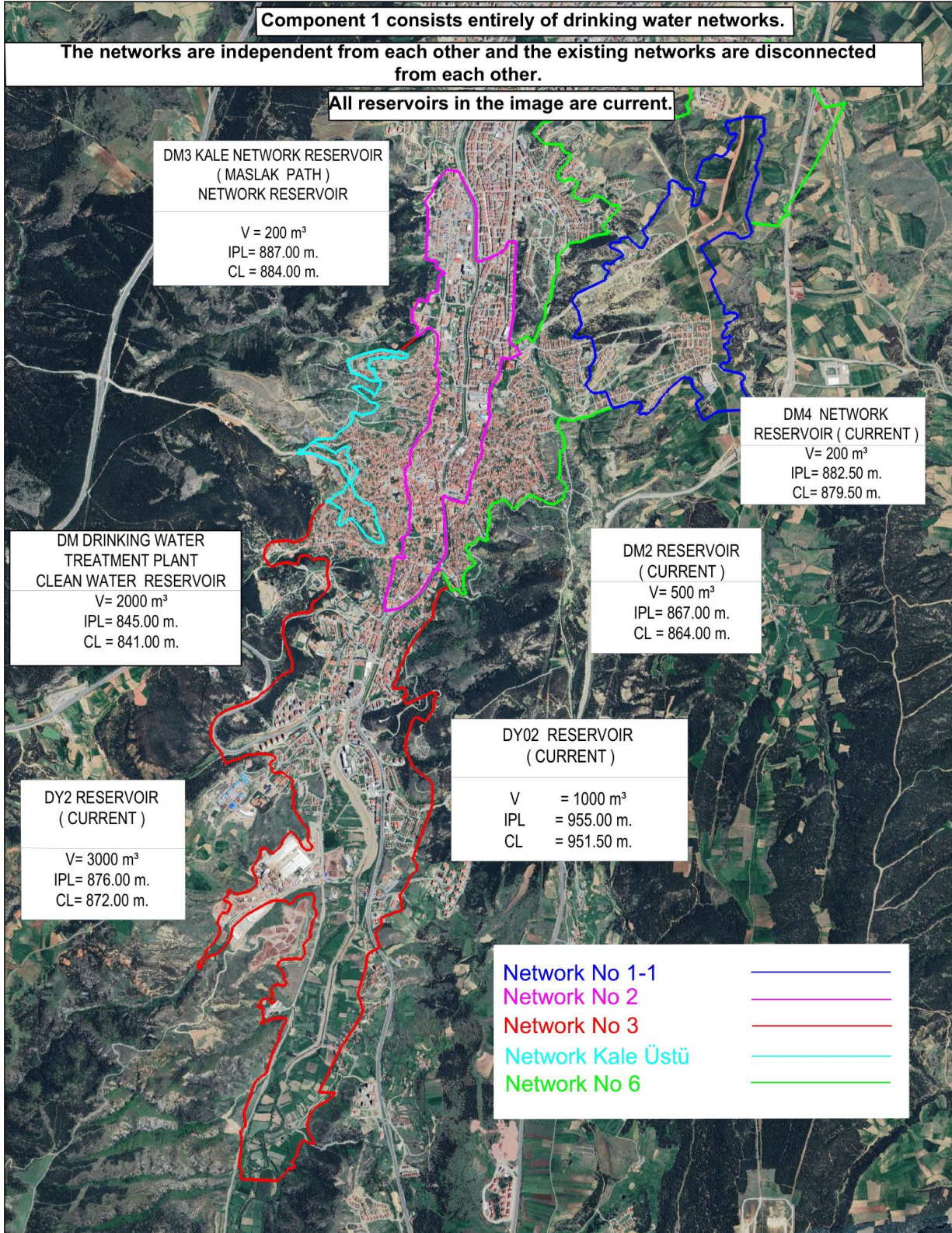


Figure 1. Drinking Water Network General Layout

1.3 Component 2 – Kastamonu (Central) Sewerage Network Project

Kastamonu (Central) Sewerage Network Project was prepared by Proeko Engineering Consultancy Construction Industry and Trade Limited Company after tendered by the Kastamonu Municipality in November 2021.

For construction purposes, there has been a need to revise some parts of the approved projects as a basis of implementation. In this context, the Revision of Drinking and Sewerage Project in Kastamonu (Central) Partial Neighborhoods was tendered by Kastamonu Municipality and carried out by the Özbek Engineering Ltd. Co.

The project does not envisage the renewal of the entire city network. Within the scope of finance, the parts that need to be renewed by the municipality have been determined by considering the needs of the city.

The Sewerage Network Project (Component 2) is planned to be built in Saraçlar, Budamiş, İsfendiyer, Yavuz Selim, Atabeygazi, Hisarardi, Akmesit, Honsalar, İsmailbey, Topçuoğlu, Esentepe, Mehmet Akif, Cebrail, Kırçeşme, and İnönü Neighbourhoods of Central District of Kastamonu Province. The details of the Component 2 of the project have been provided in the Environmental and Social Management Plan (ESMP).

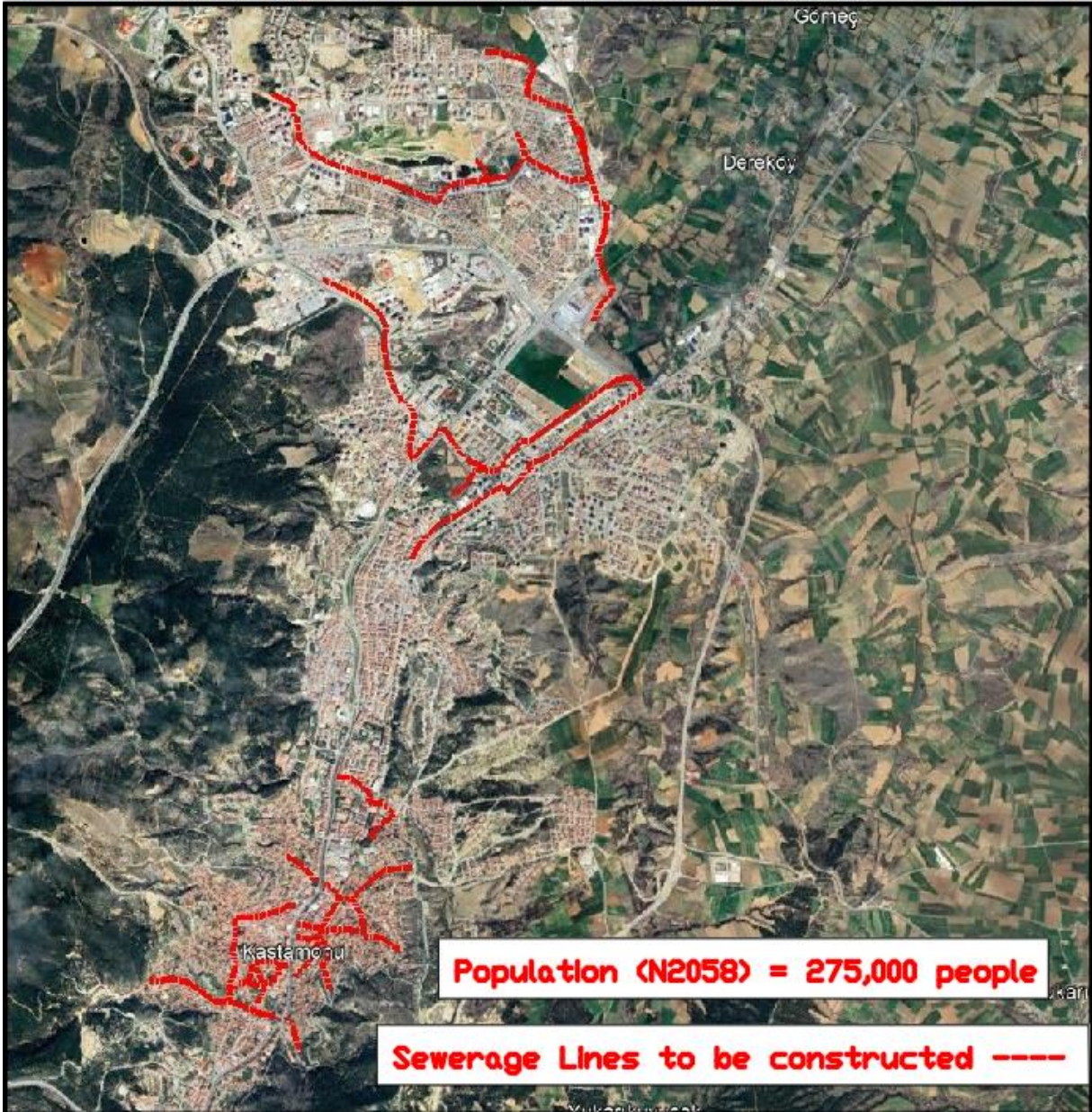


Figure 2. Sewerage Lines to be Constructed within the Scope of This Financing

2 Objective of SEP

Within the scope of the WB ESF, projects are classified into High Risk, Substantial Risk, Moderate Risk, or Low Risk category, taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the project; the nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Borrower; and the other areas of risks that may be relevant to the delivery of E&S mitigation measures and outcomes. Considering these risks and impacts, the Project has been defined as Moderate Risk Project.

The key procedural documents managing the project's E&S screening, review and monitoring procedures for sub-projects to be financed and implemented via TEFWER Project are the Environmental and Social Management Framework (ESMF), Resettlement Framework (RF), Labor Management Procedures (LMP) and Stakeholder Engagement Plan (SEP) that were prepared in accordance with the WB ESF and approved by WB. ILBANK disclosed the LMP and RF in February 2022 and ESMF and SEP in February 2023 for TEFWER Project.

In order to support the implementation of this Moderate Risk Category project, this SEP has been prepared to improve and facilitate decision making and create continuous dialogue with the stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

This SEP aims to ensure that relevant, timely, and accessible information is provided to all stakeholders of the Project (including the direct and indirect stakeholders, direct and contracted workers of the Project, other interested parties) during the preparation and implementation of this Project.

The specific objectives of the SEP are as follows:

- to identify direct and indirect stakeholders, and other interested parties and to develop and maintain a timely, continuous, accurate and transparent communication strategy and maintain a constructive relationship with all stakeholders through a well-organized approach, throughout the Project,
- to identify the nature of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social (E&S) mitigation measures,
- to promote and provide means for effective and inclusive engagement with stakeholders and other interested parties throughout the project life cycle on issues that could potentially create an impact,
- to provide stakeholders with full information of the project and potential E&S risks and impacts in a timely, understandable, accessible format
- to set out the structure of an accessible and inclusive grievance mechanism (GM) for the stakeholder and the public and allow the PIU to respond to and resolve such grievances and issues raised.

3 Stakeholder Identification and Analysis

3.1 Methodology

The goal of the stakeholder identification process is to ascertain which stakeholders may be directly or indirectly impacted, either favorably or adversely, by the project (referred to as "project affected parties") or who have an interest in the project (referred to as "other interested parties"). To make sure that the stakeholders are successfully engaged, it is essential to understand who the stakeholders are. Understanding the needs and expectations of the stakeholders regarding the involvement, along with their priorities and objectives in relation to the Project, is also essential. Following the collection of this data, the engagement process is customized for each type of stakeholder.

This will ensure the creation of a successful SEP that will carefully consider all of the project's stakeholders, including people and organizations that are either directly or indirectly impacted by the project as well as others who have an interest in it.

It is required to engage in a number of ways depending on the intensity of the impacts, whether direct or indirect. During the process of identifying stakeholders, the characteristics of the project's consequences are identified, and the methods and frequency of the relationships that will be developed with the stakeholders are studied.

3.2 Affected Parties and Other Interested Parties

The project-affected parties may include individuals or groups, including local communities. They are the individuals or households most likely to observe changes from the environmental and social impacts of the project. The residents of the 19 neighborhoods where the Project will be implemented will be directly and indirectly exposed to the impacts of land preparation, construction and operation activities.

Employees of the project and contractors are also considered as affected parties, as their working conditions depend on the procedures and principles of the Project determined by the employers.

There are 20 neighborhoods within the borders of Kastamonu Province Central District. Residents outside of the 19 neighborhoods within the Area of Influence will be indirectly affected by the Project.

The public administrations involved as project stakeholders directly and indirectly affect the preparation and construction phases of the Project. Public administrations and institutions play an important role, as their approval is required for the realization of the Project. Since these stakeholders, who were influential throughout the Project, are in the category of direct impact, active engagement should be aimed for.

The term "Other Interested Parties" (OIPs) refers to "individuals, groups, or organizations with an interest in the project, which may be because of the project location, its proximity to natural and other resources, its characteristics, and its impacts, matters related to public interest or because of the sector or parties involved in the Project.

OIPs such as governmental and nongovernmental organizations, which may have an interest in the project activities or would like to be informed about the project progress, impacts and risks, have been identified.

3.3 Disadvantaged/Vulnerable Individuals or Groups

As part of the stakeholder identification process, it is also essential to identify individuals and groups differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status, and/or may be disadvantaged in terms of accessing project benefits, information about the project or raising their concerns. The potential vulnerable/disadvantaged groups are as follows:

- Households with physically and / or mentally disabled family members,
- Elderly people over 70 years of age who live alone and in need of care,
- Female-headed households,
- Households with low or no income, and
- Refugee households.

In identifying vulnerable/disadvantaged individuals/groups, information obtained from mukhtars within the project area was used. In addition, the guidance of the official authorities and public institutions in the region helped in identifying possible vulnerable/disadvantaged individuals/groups. Therefore, effective consultation and information sharing with these individuals/groups and solving their grievances are among the objectives of the SEP.

According to information gathered from the mukhtars during the key informant interview vulnerable/disadvantaged groups/individuals presented below Table 1.

Table 1. Vulnerable/Disadvantaged Groups/Individuals in Neighbourhoods

| Neighborhood | Households with physically and / or mentally disabled family members | Households with low or no income | Female-headed households | Refugee households (Syrian) | Elderly people over 70 years of age who live alone and in need of care |
|--------------|--|----------------------------------|--------------------------|-----------------------------|--|
| Akmescit | | | | | |
| Aktekke | - | - | - | - | - |
| Atabeygazi | 3 | 91 | 40 | 3 | 41 |
| Beyçeşlebi | 20 | - | 80 | 5 | 476 |
| Budamış | 5 | 150 | 50 | 4 | 250 |
| Candaroğlu | - | - | - | - | - |
| Cebrail | - | - | - | - | 250 |
| Esentepe | 25 | 300 | 50 | - | 160 |
| Hepkebirler | 10 | 200 | 12 | 15 | 93 |
| Hisarardı | 5 | 110 | 10 | 6 | 30 |
| Honsalar | | | | | |
| İnönü | 50 | 150 | 100 | 125 | 450 |
| İsfendiyer | - | - | - | - | 138 |
| İsmailbey | - | 300 | - | 50 | 500 |
| Mehmet Akif | 75 | 400 | 306 | 150 | 600 |
| Kırçeşme | 5 | 30 | 60 | 2 | 120 |
| Saraçlar | - | - | - | - | - |
| YavuzSelim | 9 | 89 | 28 | 2 | 154 |
| Topçular | 5 | 150 | 10 | 30 | 100 |

During the project implementation, special mitigation measures will be in place to support the stakeholders to prevent their potential exclusion from the project implementation such as providing the transportation of these groups by appropriate means of transport such as private vehicles/busses.

In addition, for the working stakeholders the timing of those events will be arranged in a way to ease their participation, or alternative solutions for those will be created.

The following additional support or resources will be made available for the vulnerable/disadvantaged groups/individuals identified within the scope of this project during the planning and implementation of the stakeholder engagement activities:

- Providing translation for the refugees who do not understand/speak Turkish,
- Providing written materials related to Project information in larger fonts and in Braille system, when/where needed
- Choosing accessible venues for the consultation events and/or providing transportation for the people in remote areas (for example residents who lives away from center)
- Organizing small events or meetings for the vulnerable/disadvantaged people depending on their sensitivity, when/where needed (for example, a small meeting for deaf individuals accompanied by a sign language expert)
- Organizing the events/meetings or consultation processes with the vulnerable/disadvantaged groups in coordination with the relevant NGOs (if any) (for example, for physically disabled people, organizing the meeting/event with the help of Solidarity Association of Physically Disabled)
- The timing of the consultation events will be arranged in a way that the working stakeholders can participate. For those who cannot participate even though the timing is arranged, brochures, an active web page, social media, face-to-face individual meetings etc. could be organized.

In this respect, a comprehensive list of the stakeholders is given in Table 2.

Table 2. List of the Stakeholders Identified for the Project

| Stakeholder Category | Level | Stakeholder Group | Definitive Stakeholders | Specific Interest/Relevance |
|--------------------------------|---------------|--|--|--|
| Directly Affected Stakeholders | National | Project Parties | ILBANK | - E&S impact/risk management and monitoring - Contract management - Project management |
| | | | Kastamonu Municipality | - Reputation with regard to E&S performance of the Project |
| | | | Contractor/Sub-Contractor(s) | - Employment opportunities - E&S implementation practices on site |
| | | | Supervision Consultant | - Contract management - Controlling the project implementation - EHS Quality monitoring |
| | | | Project Personnel | - Occupational Health and Safety (OHS) Review |
| | International | International Institutions/Lenders | WB | - Project finance control - E&S risk assessment, and monitoring |
| | Local | Residential Areas/Local Communities/Potentially Project Affected | Component 1: Saraçlar, Budamiş, İsfendiye, Yavuz Selim, Atabeygazi, Hisarardi, Akmescit, Honsalar, İsmailbey, Topçuoğlu, | - Overview of E&S impacts - Community engagement for assessing the effectiveness of mitigation measures |

| Stakeholder Category | Level | Stakeholder Group | Definitive Stakeholders | Specific Interest/Relevance |
|---|----------|---|---|---|
| | | People/ Affected Land Owners / Users | Esentepe, Mehmet Akif, Cebrail, Kırçesme, and İnönü Neighbourhoods Component 2 : Saraçlar, Budamiş, İsfendiye, Yavuz Selim, Atabeygazi, Hisarardi, Akmesit, Honsalar, İsmailbey, Topçuoğlu, Esentepe, Mehmet Akif, Cebrail, Kırçesme, and İnönü Neighbourhoods | - Cooperation to maximize benefits and planning for local employment and the supply of goods and services - |
| Other Interested Parties | National | Ministries and Relevant Central Authorities | MoEUCC | - National and regional planning and development - Project-related permitting processes, mitigation measures implementation - Policy formulation - Interaction between parties - Management of cumulative Impacts |
| | | | General Directorate of EIA, Permits and Inspection | |
| | | | General Directorate of Spatial Planning | |
| | | | Ministry of Labour and Social Security | |
| | | | General Directorate of Occupational Health and Safety (OHS) | |
| | | | General Directorate of Environmental Management | |
| | | | General Directorate of Social Security | |
| | | | Ministry of Interior Disaster and Emergency Management Presidency (AFAD) | |
| | NGOs | Chamber of Environmental Engineers | - Engagement with environmental, health and safety (EHS) and social impact/risk mitigations for the Project | |
| | | Environment Foundation of Türkiye | | |
| | | Kastamonu Nature and Animals Conservation Association | | |
| | | Union of Chambers of Turkish Engineers and Architects | | |
| | Local | Governmental/Local Authorities and Agencies | Governorship of Kastamonu | - Project-related permitting processes - Coordination of project activities and processes - Management of environmental and social impacts/risks (waste, wastewater) and mitigation measures - Policy formulation - Emergency preparedness and coordination - Planning of social responsibility/social development projects - Interaction between parties |
| Kastamonu Municipality | | | | |
| Ankara Regional Directorate of Cultural Heritage Preservation Board | | | | |
| Kastamonu PDEUCC | | | | |
| KM Water and Sewerage Directorate | | | | |
| Kastamonu Special Provincial Administration | | | | |
| Kastamonu Chamber of Commerce and Industry | | | | |
| Kastamonu Provincial Directorate of AFAD | | | | |

| Stakeholder Category | Level | Stakeholder Group | Definitive Stakeholders | Specific Interest/Relevance |
|----------------------|-------|----------------------|---|---|
| | | | Kastamonu Directorate of Reconstruction and Urban Development | |
| | | | The Mukhtars of 16 Neighbourhoods | |
| | | | General Directorate of Highways 15 th Regional Directorate - Kastamonu | - Construction and operation activities within their scope of responsibilities |
| | | | Kastamonu Road and Transportation Services Directorate | |
| | | | Provincial Directorate of Turk Telecom | |
| | | | 23 rd Regional Directorate of State Hydraulic Works (SHW) | |
| | | | Başkent Electricity Distribution Corporation (Başkent EDAŞ) | |
| | | | Post, Telegraph and Telephone Administration (PTT) | |
| | | | Kastamonu Provincial Agency of the Union of Türkiye Engineer and Architect Chambers (TMMOB) | - Engagement with EHSS impacts and mitigations |
| | | | TÜRÇEP West Black Sea Environment Platform | |
| | | | Kastamonu City Council | |
| | | | Kastamonu Provincial Health Directorate | |
| | | | Kastamonu Provincial Directorate of Civil Society Relations | |
| | | | Kastamonu İŞKUR | |
| | | Business Enterprises | Business enterprises located in the Project area | - Supply of goods and services related to the project |
| | | University | Kastamonu University | - Technical consultancy |
| | | Local Media | Kastamonu Journalists Association | - Project information disclosure to the stakeholders |
| | | | Kastamonu Newspaper | |
| | | | Kastamonu Sözcü Newspaper | |
| | | | Other Local newspapers, local magazines, local TV channels etc. | |
| | | Local CSOs | Kastamonu Disabled Education Culture Youth Association | - Engagement with environmental, health and safety (EHS) and social impact/risk mitigations for the Project |
| | | | Solidarity Association for Special Individuals and Their Families | - Project information disclosure to the stakeholders |
| | | | Crippled Association of Türkiye Kastamonu Branch | |
| | | | Kastamonu Human Rights Association | |

| Stakeholder Category | Level | Stakeholder Group | Definitive Stakeholders | Specific Interest/Relevance |
|---|-------|---|--|---|
| | | | Kastamonu Food Bank Service to The Poor Association | |
| Vulnerable/Disadvantaged Individuals/Groups | Local | Vulnerable/Disadvantaged Individuals/Groups | <ul style="list-style-type: none"> - Households with physically and / or mentally disabled family members, - Elderly people over 70 years of age who live alone and in need of care, - Female-headed households,, - Households with low or no income, and - Refugee households. | <ul style="list-style-type: none"> - Ensuring that vulnerable/disadvantaged individuals/groups have access to sufficient information about the Project, ensuring that they benefit equally from the Project - Overview of E&S impacts - Community engagement for assessing the effectiveness of mitigation measures - Cooperation to maximize benefits and planning for local employment and the supply of goods and services |

4 Stakeholder Engagement Program

4.1 Summary of Previous Stakeholder Engagement Activities

In line with the survey studies carried out specifically for the 19 neighborhood mukhtars, under the category of “affected parties”, vulnerable/disadvantaged persons or communities that may be directly/indirectly affected by the Project are analyzed. In this context, the existence and numbers of the vulnerable/disadvantaged groups/persons were asked in the interviews held with the mukhtars.

The key informant interviews were carried out with the mukhtars on January 26-27, 2024 to measure their knowledge about the Project and to collect data and information on the socio-economic status of the neighborhoods and project related documents (ESMP, SEP etc.). During the key informant interviews, brief information about the project, its potential impacts and risks and how these impacts will be mitigated/monitored were also provided to the stakeholders.

As part of the key informant interviews, within the scope of the field studies carried out on January 26-27, 2024, Kastamonu Municipality was visited by Özbek Engineering Ltd. Some of the information gained from this meeting is as follows:

- It has been decided by the Provincial Directorate of Environment, Urbanization and Climate Change that the Project has an exemption from the EIA procedure.
- There will be no land acquisition within the scope of the Project.
- During the construction phase of the project, priority will be given to local employment opportunities in order to meet the workforce needs.
- It is planned to employ approximately ten (10) people during the operation phase of the project.

Moreover, face-to-face interviews were held with the mukhtars of 19 neighborhoods on January 26-27, 2024. In these interviews, information about the general socio-economic structure of the neighborhoods was obtained from the mukhtars. The findings of these interviews are presented below Table 3 and the pictures of these interviews are given Annex 1.

Table 3. Key Informant Interview Findings

| Neighborhood | Population | | | Households | Major Economic Activities | Major Problem | Heard about the project before | If Yes, Details | General Attitude |
|--------------|------------|------|-------|------------|---------------------------|----------------|--------------------------------|------------------------|------------------|
| | Female | Male | Total | | | | | | |
| Akmescit | - | - | - | - | - | - | - | - | - |
| Aktekke | 1843 | 1854 | 3697 | - | Pension | Zonning Plan | No | - | Positive |
| Atabeygazi | 150 | 168 | 318 | 132 | Pension | Infrastructure | No | - | Positive |
| Beyçelesi | 1421 | 1207 | 2628 | - | - | - | Yes | Kastamonu Municipality | Positive |
| Budamış | 1476 | 1386 | 2862 | 1020 | Paid work (Civil Servant) | Infrastructure | No | - | Positive |
| Candaroğlu | 4336 | 4137 | 8473 | - | - | Infrastructure | Yes | Kastamonu Municipality | Positive |
| Cebrail | 835 | 796 | 1631 | 650 | Commercial activities | Parking Space | Yes | Kastamonu Municipality | Positive |
| Esentepe | 1601 | 1438 | 3039 | 1100 | Pension | Zonning Plan | No | - | Positive |
| Hepkebirler | 779 | 728 | 1507 | 485 | - | Zonning Plan | Yes | Kastamonu Municipality | Positive |

| Neighborhood | Population | | | Households | Major Economic Activities | Major Problem | Heard about the project before | If Yes, Details | General Attitude |
|--------------|------------|-------|-------|------------|---------------------------|----------------|--------------------------------|------------------------|------------------|
| | Female | Male | Total | | | | | | |
| Hisarardı | 650 | 600 | 1250 | 1100 | Pension | Infrastructure | No | - | Positive |
| Honsalar | - | - | - | - | - | - | - | - | - |
| İnönü | 11215 | 10013 | 21228 | 9500 | Pension | Infrastructure | No | - | Positive |
| İsfendiye | 508 | 570 | 1078 | 350 | Commercial activities | - | Yes | Kastamonu Municipality | Positive |
| İsmailbey | 3000 | 4000 | 7000 | 1500 | Pension | Infrastructure | Yes | Kastamonu Municipality | Positive |
| Mehmet Akif | 12897 | 12184 | 25084 | 11500 | Pension | Infrastructure | No | - | Positive |
| Kırçeşme | 719 | 613 | 1332 | 1184 | Pension | Infrastructure | No | - | Positive |
| Saraçlar | 6907 | 5299 | 12206 | - | - | - | No | - | - |
| YavuzSelim | 404 | 391 | 795 | 488 | Pension | Superstructure | Yes | Kastamonu Municipality | Positive |
| Topçular | 440 | 406 | 846 | 305 | Paid work (Civil Servant) | Drinking Water | No | - | Positive |

4.2 Summary of Project Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement

The SEP is prepared for engagement with stakeholders and ensuring they are informed and their concern take in to account throughout life-cycle of the project. The engagement events will be arranged such that all key stakeholders are involved to the fullest extent possible. To optimize stakeholder participation, it avoids disrupting local stakeholders' everyday work and controls the time and frequency of engagement activities. As a result, it is critical to document the results and comments as part of all engagement activities, share them with the appropriate parties, and adhere to the procedure. Also, engagement initiatives must be culturally acceptable, give equitable access to important stakeholders, and allow for feedback. Finally, all engagement efforts adhere to the project-specific SEP timetable and the promises made in the ESMP.

Following the conclusion of the ESMP and SEP, consultation sessions with stakeholders and other interested parties will be conducted in line with WB ESSs and TEFWER's ESMF. Registration forms and complete meeting minutes from the consultations will be documented but not made public as an appendix to the SEP. While the SEP is being announced, the appropriate lines containing personal data will be obscured in accordance with the Personal Data Protection Law. The SEP will contain all supporting documentation for stakeholder activities, such as media ads, participation lists, meeting minutes, and example brochures.

The final approved SEP will be disclosed by ILBANK and Kastamonu Municipality to the stakeholders to inform them about the potential benefits of the planned Project and the potential adverse impacts and associated mitigation measures through appropriate methods.

Communication and information throughout the construction and operation phases of the Project will be recorded through a sample for stakeholder engagement log sample is given in Annex 6 and will be conducted with the methods described in Table 5.

The Consultation Form to be used during the stakeholder engagement process is provided as Annex 3 of this plan. Similar to GM which is detailed in Chapter 6, follow-up actions will be clarified by managements of Project Implementation Unit (PIU) and/or Contractor. Subsequently, Consultation Form together with Stakeholder Engagement Log will be filled accordingly by Community Liaisons Officers (CLOs) to be assigned by Kastamonu Municipality as explained in Chapter 5. Then relevant consulted stakeholder is informed via phone call and/or e-mail by CLOs regarding the follow-up actions. Therefore, time periods to be adopted during GM process will be also considered during consultation process as well.

The following measures can be considered for the vulnerable/disadvantaged stakeholders to ease their participation if needed:

- Providing Arabic translation for the refugees who do not understand/speak Turkish,
- Providing written materials in Arabic related to Project information in larger fonts and in Braille system, when/where needed,
- Choosing accessible venues for the consultation events and/or providing transportation for the people in remote areas (for example in villages),
- Organizing small events or meetings for the vulnerable people depending on their sensitivity (for example a small meeting for deaf individuals accompanied by a sign language expert)
- Organizing the events/meetings or consultation processes with the vulnerable/ disadvantaged individuals/groups in coordination with the relevant NGOs (if any and desired by any NGOs in the future) (for example, for physically disabled people, organizing the meeting/event with the help of Solidarity Association of Physically Disabled).

The potential Civil Society Organizations (CSO) for the vulnerable/disadvantaged stakeholders have been identified during the preparation of this SEP document and presented below. These are not limited to the following, but other relevant CSOs that are interested in the project during the project construction and operation period can also be included in the list below.

- Kastamonu Disabled Education Culture Youth Association
- Solidarity Association for Special Individuals and Their Families
- Crippled Association of Turkey Kastamonu Branch
- Kastamonu Human Rights Association
- Kastamonu Food Bank Service to The Poor Association

Table 4. Stakeholder Engagement Program during the Preparation, Construction and Operation Phase

| Phase | Target Stakeholder | Consultation Subject | Documents to be Disclosed | Methods | Frequency | Responsible |
|---------------------|--|---|--|---|---|---|
| Preparation | Local Communities (including vulnerable/disadvantaged groups/individuals) Potentially Project Affected People Affected Land Owners/Users | <ul style="list-style-type: none"> • Draft ESMP • Draft SEP (including GM) • Information of Project timeline and conditions that may occur during Project construction and operation | <ul style="list-style-type: none"> • ESMP • SEP (including GM) • Brochures covering information on the communication channels and GM | <ul style="list-style-type: none"> • Face to face meetings • Information boards at local mukhtar offices and project site • Consultation meetings • Project Brochures • Information Boards at local CSO offices and Project site | <ul style="list-style-type: none"> • During the preparation of the ESMP and SEP • At least once with the mukhtars of 16 Neighborhoods • At least once with the Project Affected People and Vulnerable/Disadvantaged Individuals/Groups | <ul style="list-style-type: none"> • PIU |
| Preparation | <ul style="list-style-type: none"> • Ministries and Relevant Central Authorities • Governmental/Local Authorities and Agencies | <ul style="list-style-type: none"> • Project information scope and rationale and E&S principles • Getting necessary approvals/opinions • Coordination activities | <ul style="list-style-type: none"> • ESMP • SEP (including GM) | <ul style="list-style-type: none"> • Face to face meetings • Official correspondence and meetings, information disclosure and consultation reporting, monitoring, permit requests | <ul style="list-style-type: none"> • During the preparation of the ESMP and SEP • At least once with the related authorities | <ul style="list-style-type: none"> • PIU |
| Construction | Residential Areas/Local Communities/Potentially Project Affected People/ Affected Land Owners / Users | <ul style="list-style-type: none"> • Inform about project related E&S instruments (ESMP, SEP etc.) • Grievance Mechanism • Deliver information regarding requirements and opportunities of local employment • Disclose information on Project, E&S aspects and associated impacts of which related to construction activities • Inform the mukhtars about all aspects of Project-related | <ul style="list-style-type: none"> • Project information, E&S, construction / operation impacts and associated mitigation measures. • Brochures covering information on the communication channels and GM • Outcomes of monitoring activities in a summary format | <ul style="list-style-type: none"> • Consultation meetings • Face to face meetings • Ad-hoc meetings • Information boards at local mukhtar offices and project site | During construction phase – Monthly | <ul style="list-style-type: none"> • Contractor • Project Implementation Unit (PIU) |

| Phase | Target Stakeholder | Consultation Subject | Documents to be Disclosed | Methods | Frequency | Responsible |
|---------------------|---|--|---|---|---|--|
| | | information to include project timeline, and conditions that may affect daily routines that may occur during Project construction and operation, E&S impacts and mitigations (all of the impacts/risks identified, and mitigations measures described in the ESMP), | | | | |
| Construction | <ul style="list-style-type: none"> National-Ministries and Relevant Central Authorities Local-Governmental/Local Authorities and Agencies | <ul style="list-style-type: none"> Consult the authorities about relevant permissions, environmental, occupational and social issues, during construction Collaborate with the authorities on emergency preparedness and response plan Project information scope and rationale and E&S principles Coordination activities Grievance Mechanism | <ul style="list-style-type: none"> Up-to-date information on the Project for disclosure Project information, E&S, construction impacts and associated mitigation measures. Emergency preparedness and response collaboration ESMP and SEP | <ul style="list-style-type: none"> Face to face meetings Email correspondence or other means Invitations to public/community meetings Mobile technology (phone calls, SMS, Corporate Website, etc.) Project Brochures Presentations | During construction phase – Bi annually | <ul style="list-style-type: none"> PIU Community Liaison Officer (CLO) (KM & Contractor) |
| Construction | Business Enterprises | <ul style="list-style-type: none"> Deliver information regarding requirements and opportunities of local procurement and service provision Disclose information on Project, E&S aspects and associated impacts of which related to construction activities | <ul style="list-style-type: none"> Particular information on required goods and services Project information, E&S, construction / operation impacts and associated mitigation measures. Grievance Mechanism ESMP and SEP | <ul style="list-style-type: none"> Face to face meetings Email correspondence Mobile technology (phone calls, SMS, Corporate Website, etc.) | During construction phase - Monthly | <ul style="list-style-type: none"> Contractor PIU |

| Phase | Target Stakeholder | Consultation Subject | Documents to be Disclosed | Methods | Frequency | Responsible |
|--------------|---|---|--|---|-------------------------------------|--|
| Construction | <ul style="list-style-type: none"> • NGOs • University • Local Media • Local CSOs | Information on updated Project status, associated project activities, potential E&S impacts of which depending on Project phase, Project E&S Management System (ESMS) including community HS management and emergency preparedness issues | <ul style="list-style-type: none"> • E&S issues (Particularly prepared documentation/materials as a response to concerns on the Project) • Visual materials/advertisements on Project-related information • ESMP and SEP | <ul style="list-style-type: none"> • Face to face meetings • Email correspondence • Mobile technology (phone calls, SMS, Corporate Website, etc.) • Project Brochures • Presentations | During construction – if needed | <ul style="list-style-type: none"> • PIU • Contractor • |
| Construction | <ul style="list-style-type: none"> • Project Parties • International Institutions/Lenders | <ul style="list-style-type: none"> • Deliver updated E&S Performance of Project to the Lenders • Comply with the WB requirements | <ul style="list-style-type: none"> • Semi-annual reports to be submitted to WB by ILBANK • Outcomes of monitoring activities in a summary format | <ul style="list-style-type: none"> • Face to face meetings • Email correspondence • Mobile technology (phone calls, SMS, Corporate Website, etc.) • Project Brochures • Presentations | During construction – Bi-annually | <ul style="list-style-type: none"> • PIU |
| Construction | <ul style="list-style-type: none"> • Vulnerable/Disadvantaged Individuals/Groups | <ul style="list-style-type: none"> • ESMP • SEP (including GM) • All aspects of project-related information to include project timeline and conditions that may affect daily routines that may occur during Project construction, E&S impacts/risks and mitigations (all of the impacts and mitigations identified in the ESMP) • | <ul style="list-style-type: none"> • Project information, E&S, construction impacts and associated mitigation measures. • Emergency preparedness and response collaboration • Outcomes of monitoring activities in a summary format • ESMP and SEP | <ul style="list-style-type: none"> • Special provisions as defined in section 3.3. • Face to face meetings • Information boards at local CSO offices and project site • Consultation meetings • Project Brochures • | During construction phase – Monthly | <ul style="list-style-type: none"> • PIU |

| Phase | Target Stakeholder | Consultation Subject | Documents to be Disclosed | Methods | Frequency | Responsible |
|-----------|--|---|---|---|----------------------|---|
| Operation | <ul style="list-style-type: none"> All stakeholders | <ul style="list-style-type: none"> Grievance Mechanism | <ul style="list-style-type: none"> GM forms and guidance ESMP and SEP | <ul style="list-style-type: none"> Face to face meetings Email correspondence Mobile technology (phone calls, SMS, Corporate Website, etc.) Project Brochures | During the operation | <ul style="list-style-type: none"> PIU |

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the lifetime of the Project. Kastamonu Municipality will be in active communication with identified stakeholders throughout the lifetime of the project. In particular, Kastamonu Municipality will seek feedback from stakeholders on the environmental and social performance of the project and the implementation of the identified mitigation measures and the Grievance Mechanism. If there are significant changes in the project resulting in additional risks and impacts, especially where they will affect the stakeholders, Kastamonu Municipality will provide information on these risks and impacts and consult with the stakeholders on how to mitigate these risks and impacts.

For each of the targeted stakeholder group, different disclosure methods and means can be used in order to increase their access to and engagement in the SEP. Especially for the stakeholder consultation meetings, the meeting venue(s), time and date will be arranged, and that information will be announced to the public at least 10 days before the event making sure that all community members are informed about the event to be held.

5 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

The KM and Contractor will implement the stakeholder engagement activities during the construction and operation phases of the Project. Supervision Consultant will provide assistance to Kastamonu Municipality and the Contractor to be awarded for effective implementation of this SEP activities.

5.1 Resources

Adequate budget will be allocated for communication with stakeholders and grievance resolution mechanism. The budget is included in the project budget. The KM/PIU will be the main responsible party for the coordination, implementation and monitoring and reporting of the implementation of the SEP and coordination with the Contractors. Detailed roles and responsibilities for the stakeholder engagement of the Project are given in Table 6.

5.2 Management Functions and Responsibilities

The Kastamonu Municipality/PIU will be the main responsible party for the coordination, implementation and monitoring and reporting of the SEP's implementation and coordination with the Contractors. Detailed roles and responsibilities for the stakeholder engagement of the Project are given in Table 6.

Table 5. Roles and Responsibilities

| Institution | | Roles and Responsibilities |
|------------------------------|---|---|
| Kastamonu Municipality / PIU | Project Manager (Head of the PIU) | <ul style="list-style-type: none"> - Incorporates all stakeholder engagement activities into overall E&S management systems; develops an internal system for communicating the progress and results of stakeholder engagement to senior management and staff members, - Expedites, monitors, follows up and coordinates the relevant parties and social team for proper implementation of processes related to grievance mechanism and stakeholder engagement issues, - Coordinates with parties for proper implementation of processes related to grievance mechanism and stakeholder engagement issues, - Informs ILBANK via Environmental and Social Monitoring Reports (ESMRs) quarterly, which will be submitted by contractors on a monthly basis. |
| | Social Expert of PIU Project Team GM | <ul style="list-style-type: none"> - Ensures stakeholder engagement is understood by all Municipality staff members, contractors and consultants through trainings, - Produces all work in accordance with Project procedures and contract terms as well as quality, safety, budget and schedule requirements, - Ensures the successful delivery of all defined documentation associated with the stakeholder engagement, - Manages stakeholder consultation meetings and other disclosure activities related to public disclosure of information, - Follows up the disclosure activities carried out within the scope of the SEP, - Coordinates interface and reporting to/from WB on the implementation of SEP with ILBANK, - Meets with ILBANK/WB's responsible teams and responds to queries as necessary, - Allows the Contractor to inform the public about construction activities and other project related issues, - Implements processes related to grievance mechanism and stakeholder engagement, including record keeping, reporting, etc., - Manages necessary reporting to complainants and PIU, |

| Institution | | Roles and Responsibilities |
|----------------------|--|--|
| | | <ul style="list-style-type: none"> - Ensures the implementation of necessary mitigation measures/actions for the implementation of the SEP, - Takes actions to resolve project-related complaints in coordination with other project units, - Annual review of SEP and updating it if necessary, based on project improvements and unexpected public response, - Takes proper actions according to the information submitted from Kastamonu Municipality PIU. |
| | Community Liaison Officer (CLO) | <ul style="list-style-type: none"> - Records the complaints, requests and suggestions about the Project and shares them with the PIU, - Follows up and monitor project related complaints, - Gives feedback to the complainant about the resolution of the grievances received from PIU. |
| E&S Consultant of KM | Environmental Specialist Social Specialist | <ul style="list-style-type: none"> - Preparing the ESMP and SEP, for the approval of ILBANK and WB, - Taking a part in organizing the stakeholder consultation (ESMP introduction) meeting to be held for the public/stakeholders and NGOs as part of the project, - Finalizing the reports as per the concerns/opinions of the stakeholders. |
| Contractor | Environmental and Social (E&S) Specialist | <ul style="list-style-type: none"> - Implements and develops Contractor's social policy, - Provides necessary resources for proper remedial actions, - Follows up of the complaints and informs CLO about the solution process, - Consults with the project affected communities about grievance mechanism, entitlements, construction works and schedule, community safety, compensation of economic losses as needed in coordination with CLO and Social Expert of PIU, - Keeps records of complaints and participation activities when necessary and forward them to CLO and Social Expert of PIU, - Reports grievances to GM Team, - Submits monthly Environmental and Social Monitoring Reports (ESMRs) to Kastamonu Municipality (CLO related parts). - The construction contractor should develop monthly ESMRs and submits to Municipality through the Supervision Consultant. |
| | ILBANK | <ul style="list-style-type: none"> - Informs WB via ESMRs in six (6)-month periods together with Project Progress Reports. - Reviewing the documents related to the environmental and social assessment of the project, provide comments to consultants, and giving official approval to these documents and procedures in accordance with the WB requirements, - Performing an overall quality assurance function that the Environmental Assessment (EA) documents prepared meet WB requirements. |
| ILBANK | Social Specialist | <ul style="list-style-type: none"> - Review the SEP document to redefine the stakeholders directly or indirectly affected and/or interested in the Project and to follow up the implementation of the methods, instruments, timing and participation levels identified in the SEP, - Interviews Kastamonu Municipality PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, - Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the Project, - Interacts with various stakeholders to get their views on SEP implementation, - Controls whether the necessary trainings are given to the personnel who will work during the construction phase, - Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other project activities and to reveal actions, |

| Institution | | Roles and Responsibilities |
|------------------------|-------------------|--|
| | | <ul style="list-style-type: none"> - Meets with WB safeguard policies and audit teams and responds to queries as necessary, - Monitors and reports on progress made in relation to the commitments defined in SEP. |
| Supervision Consultant | Social Specialist | <ul style="list-style-type: none"> - Review the SEP document to redefine the stakeholders directly or indirectly affected and/or interested in the Project and to follow up the implementation of the methods, instruments, timing and participation levels identified in the SEP, - Interviews Kastamonu Municipality PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, - Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the Project, - Interacts with various stakeholders to get their views on SEP implementation, - Controls whether the necessary trainings are given to the personnel who will work during the construction phase, - Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other project activities and to reveal actions, - Meets with WB safeguard policies and audit teams and responds to queries as necessary, - Monitors and reports on progress made in relation to the commitments defined in SEP. |

6 Grievance Mechanism

Managing, avoiding, minimizing and effective handling of grievances is an integral part of a sound stakeholder engagement strategy. Experience indicates that a significant number of grievances arise from misunderstandings and that such grievances can be avoided or reduced through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating to grievances. For this reason, a project specific Grievance Mechanism (GM) as per WB will be implemented by KM/PIU throughout the lifetime of the Project including pre-construction, construction, and operation phases.

Currently, the Project Owner handles public grievances and views through the Hilal Masa² system. This municipal unit was established to receive grievances and requests from local citizens and intended to produce possible solutions within the municipality for reported concerns. While the Hilal Masa system is not regarded as a project-specific grievance mechanism, it functions as a general grievance system adopted by municipalities within their own organizations.

Although the Hilal Masa system can be used to receive Project related grievances, a project-specific grievance mechanism is required to be established to compile the project related grievances and direct these to the responsible personnel and or unit for the resolution. Other grievances received by Contractor, CİMER, YİMER, İLBANK, WB etc. will also be directed to this central system.

6.1 Receiving Grievances

Stakeholders will be able to communicate their grievances and views via the channels presented below:

6.1.1 KM/PIU Level

The contact details of PIU office in KM via which stakeholders can communicate their grievances are as follows;

- Web site : <https://www.kastamonu.bel.tr/v2/>
- Email : hilalmasa@kastamonu.bel.tr
- Phone Number: +90 366 153 00 00
- Official Letter : Aktekke Mah. Yalçın Cad. Barbaros Sok. Belediye Başkanlığı Binası
Kastamonu
- The Hilal Masa system³: Call Centre 153 (Alo 153)

Grievances, requests, suggestions, and opinions will be recorded through the Community Liaison Officer (CLO) to be assigned by Kastamonu Municipality. The grievances collected regarding the Project will be recorded on the Grievance Registration Table provided in Annex 5 and then they will be registered in the Grievance Register Form (see Annex 2). Within two (2) business days after the complaint is received, a notification will be sent to the complainant by CLO stating that the complaint has been received and evaluated. These forms will be available in hard copies at the municipal offices and on the municipality's website.

The complaint database will include complainant information, date of receipt of complaint/suggestion, date and method of feedback to complainant, status of complaint (open, under review, closed, rejected) and explanations of that current situation (i.e. why it was rejected, etc.), closing/rejection and feedback dates.

² <https://www.kastamonu.bel.tr/v2/iletisim-bilgileri/>

³ <https://www.kastamonu.bel.tr/v2/portfolio/hilalmasa/>

KM and PIU team will assess the grievances and suggest solutions for public GM with the use of this GM, which will be easily accessible for all Project stakeholders.

6.1.2 Contractor Level

Contractor will establish their own grievance mechanisms in line with the KM GM. The municipality will ensure that the contractor level GM is operational. If the grievances submitted to the contractor's GM can be resolved at contractor level, then the Contractor will be responsible for its resolution and record. However, if the grievance requires further assessment and resolution at different levels, the Contractor will also be responsible for informing relevant parties about the grievance.

6.1.3 İLBANK Level

If stakeholders fail to reach a satisfactory solution through the channels provided above or have requests for a higher-level explanation, they will be able to reach (İLBANK's communication channels).

The communication tools of İLBANK through which Project-related grievances can be submitted are given below:

- Website : <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- E-mail : bilguidb@ibank.gov.tr and etikuidb@ilbank.gov.tr
- Phone Number : +90 312 508 79 79
- Official Letter : İLBANK Department of International Relations, GM Team (letters must be marked as personal or confidential) Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

When İLBANK receives a complaint, GM Team will register and evaluate the complaint. If the complaint is related with any of sub-projects, İLBANK will send the complaint to municipalities'/utilities' GM since they will (there is a Project Implementation Unit for projects financed by İLBANK through IFI) have their own GM. After this stage, İLBANK's role will be to follow the progress of the complaint within its GM system. If the complaint is not resolved within the committed duration (fifteen (15) working days after the complaint is received and evaluated), İLBANK GM Team will take over the issue.

Certain complaints warrant urgent action, and the regular GM procedure may be inappropriate or too slow to prevent an issue from escalating. A separate fast-tracked GM, including guidance on the circumstances under which it will be employed, can help ensure that high-priority complaints (grievances related to sexual exploitation and abuse, sexual harassment, vulnerable groups' complaints etc.) are dealt with in a timely manner. In the case of complaints alleging serious harm or risk of harm, and/or serious rights violations, the GM's standard operating procedures will call for a fast-track response, whether by the GM or by immediate referral to another office or organization and immediate notification to the complainant of that referral.

The GM Policy of İLBANK has been disclosed on their official webpage and is available to all stakeholders.

6.1.4 National Level

If stakeholders fail to reach a satisfactory solution through the channels provided above or have requests for a higher-level explanation, they will be able to reach the Presidency's Communication Centre (CIMER) and the Foreigners Communication Centre (YIMER).

Presidency's Communication Centre (CIMER)

A national centralized grievance system has been installed for Turkish citizens and legal persons under the Presidency's Communication Centre (CIMER). The channel will be accessible to project stakeholders as well so that grievances can be directly submitted to state authorities. The contact details of CIMER is available below:

- Website : www.cimer.gov.tr
- Call Centre : 150
- Phone number : +90 312 525 55 55
- Fax number : +90 312 473 64 94
- E-mail : cumhurbaskanligi@tcbb.gov.tr
- Address for Official Letter/Petition: Republic of Türkiye, Directorate of Communications Kızılırmak Mah. Mevlana Bulvarı No:144 Çankaya/ANKARA
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates

Foreigners Communication Centre (YIMER)

A centralized grievance system in other words the Foreigners Communication Centre (YIMER) under the General Directorate of Migration Management of the Ministry of Interior has been also enabled for foreigners. The channel will be accessible to Project stakeholders as well so that grievances can be directly to be submitted to state authorities. The contact details of YIMER is available below:

- Website : www.yimer.gov.tr
- Call Centre : 157
- Phone number : +90 312 5157 11 22
- Fax number : +90 312 920 06 09
- E-mail : yimer@goc.gov.tr
- Address for Official Letter/Petition: Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the Republic of Türkiye General Directorate of Migration Management

6.1.5 Appeal Mechanism

Applicants, whose complaints could not be resolved through existing GM or whose complaints contains sensitive issues can always apply to the relevant legal institutions. Such institutions can be summarized as follow:

- Civil Courts of First Instance,
- Administrative Court,
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

Relevant legal process will be monitored through GM.

6.2 Public Grievance Mechanism

During construction and operational activities, the GM described above shall continue to be driven by stakeholders' views, making this procedure accessible to all stakeholders including workers. Requests that require urgent remedy and/or support shall be responded to and given support within the same day. All outstanding grievances/requests shall be recorded within two business days, reviewed and assessed within ten business days, and concluded not later than 15 business days. Corrective actions shall be taken to resolve the grievance. GM summary is given in Table 7.

Table 6. Public Grievance Mechanism Summary

| Grievance Process | Requirement / Action | Responsible Party |
|-------------------------------------|---|-------------------|
| Submission of complaint | Receiving the grievance by any communication channel explained above (Section 6.1.). (At this point, if the complaint is a sensitive grievance involving child abuse, sexual harassment or abuse or Gender Based Violence (GBV), immediate action will be taken within 48 hours after receiving the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment (SEA/SH) at workplace or any potential child abuse in the project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office. | KM/PIU |
| Registration of complaint | Registering/recording through making an entry in the grievance register (see Annex-5 for a sample) and filling of the Grievance Form (see Annex-2). All the complaints will be registered at the same day that grievance is received and feedback will be given to the complainant. The detailed information about the complaint may be requested from the complainant within this period. The complaint also will be evaluated during this stage whether the complaint related to project activities. If the complaint is not valid, providing relevant explanation to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met. | KM/PIU |
| Forwarding of complaint | The complaint is forwarded to the relevant persons (CLO of the PIU/Contractor) responsible for handling the complaint in not later than two (2) working days upon receiving the complaint. | KM/PIU |
| Response for a complaint | If the complaint is valid, identifying and taking corrective measures for resolving the complaint in not later than fifteen (15) working days upon receiving. KM/PIU will address the complaint, and a discussion/meeting with complainant/representative of complainant will take place during the resolving the complaint to ensure a satisfactory resolution. If an agreement cannot be reached on the closure of the complaint, the complainant will be informed that he/she may apply Project Internal Appeal Mechanism and External Appeal Mechanism. After the notification of this process, the Grievance Closeout Form will be filled (see Annex 4). All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. At this point, it should be noted that the action taken and the result of this anonymously recorded grievance will be shared on the KM website, so that anonymous complainant is informed about their complaint and the results. | KM/PIU |
| Recording the result of a complaint | Recording the result of the complaint in grievance register (see Annex 5). | KM/PIU |

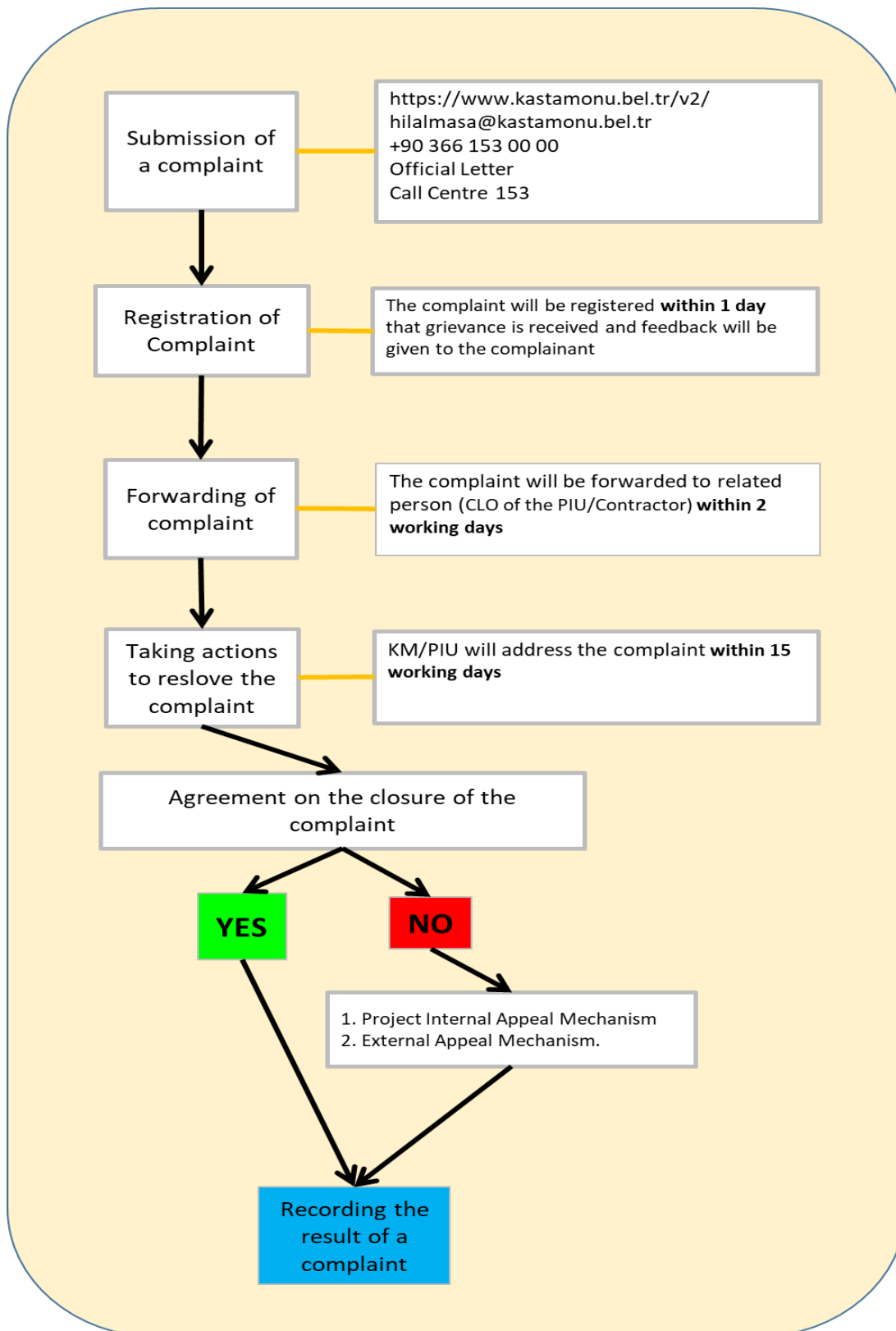


Figure 3 Public Grievance Mechanism Flowchart

6.3 Worker GM

The Worker GM will have the grievance receiving channels as described below:

- Web site : <https://www.kastamonu.bel.tr/v2/>
- Email : hilalmasa@kastamonu.bel.tr
- Phone Number: +90 366 153 00 00
- Official Letter : Aktekke Mah. Yalçın Cad. Barbaros Sok. Belediye Başkanlığı Binası
Kastamonu
- The Hilal Masa system⁴: Call Centre 153 (Alo 153)
- Complaint Boxes

The workers (direct, contracted, including PIU staff) will be informed about the existence of grievance mechanisms, through notice boards, the presence of "suggestion/complaint boxes" and other means as needed. In addition, the workers' grievance mechanism will be described during the personnel induction trainings to be provided to all project workers. The workers' GM will allow submission of anonymous grievances and requests and these anonymous applications will also be addressed and handled. In case of an anonymous grievances, the summary and resolution of the grievance will be published on the Municipality website, on the bulletin boards around the Project Administrative Building.

KM and PIU team will assess the grievances and suggest solutions for employees of direct and contracted workers with the use of this internal GM, which will be easily accessible for all Project workers.

Table 7. Worker Grievance Mechanism Summary

| Grievance Process | Requirement / Action | Responsible Party |
|--------------------------------------|--|-------------------|
| Submission of complaint ^a | Receiving the grievance by any communication channel explained above (Section 6.3.). (At this point, if the complaint is a sensitive grievance involving child abuse, sexual harassment or abuse or Gender Based Violence (GBV), immediate action will be taken within 48 hours after receiving the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment (SEA/SH) at workplace or any potential child abuse in the project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office. | KM/PIU |
| Registration of complaint | Registering/recording through making an entry in the grievance register (see Annex-5 for a sample) and filling of the Grievance Form (see Annex-2). All the complaints will be registered at the same day that grievance is received and feedback will be given to the worker. The detailed information about the complaint may be requested from the worker within this period. Anonymous grievances and requests and these anonymous applications will also be addressed and handled | KM/PIU |
| Forwarding of complaint | The complaint is forwarded to the relevant persons (CLO of the PIU/Contractor) responsible for handling the complaint in not later than two (2) working days upon receiving the complaint. | KM/PIU |
| Response for a complaint | Identifying and taking corrective measures for resolving the complaint will in place in not later than fifteen (15) working days upon receiving. KM/PIU will address the complaint, and a discussion/meeting with worker will take place during the resolving | KM/PIU |

⁴ <https://www.kastamonu.bel.tr/v2/portfolio/hilalmasa/>

| Grievance Process | Requirement / Action | Responsible Party |
|-------------------------------------|---|-------------------|
| | <p>the complaint to ensure a satisfactory resolution. If an agreement cannot be reached on the closure of the complaint, the worker will be informed that he/she may apply Project Internal Appeal Mechanism and External Appeal Mechanism. After the notification of this process, the Grievance Closeout Form will be filled (see Annex 4).</p> <p>All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.</p> <p>At this point, it should be noted that the action taken and the result of this anonymously recorded grievance will be shared on the KM website, so that anonymous complainant is informed about their complaint and the results.</p> | |
| Recording the result of a complaint | Recording the result of the complaint in grievance register (see Annex 5). | KM/PIU |

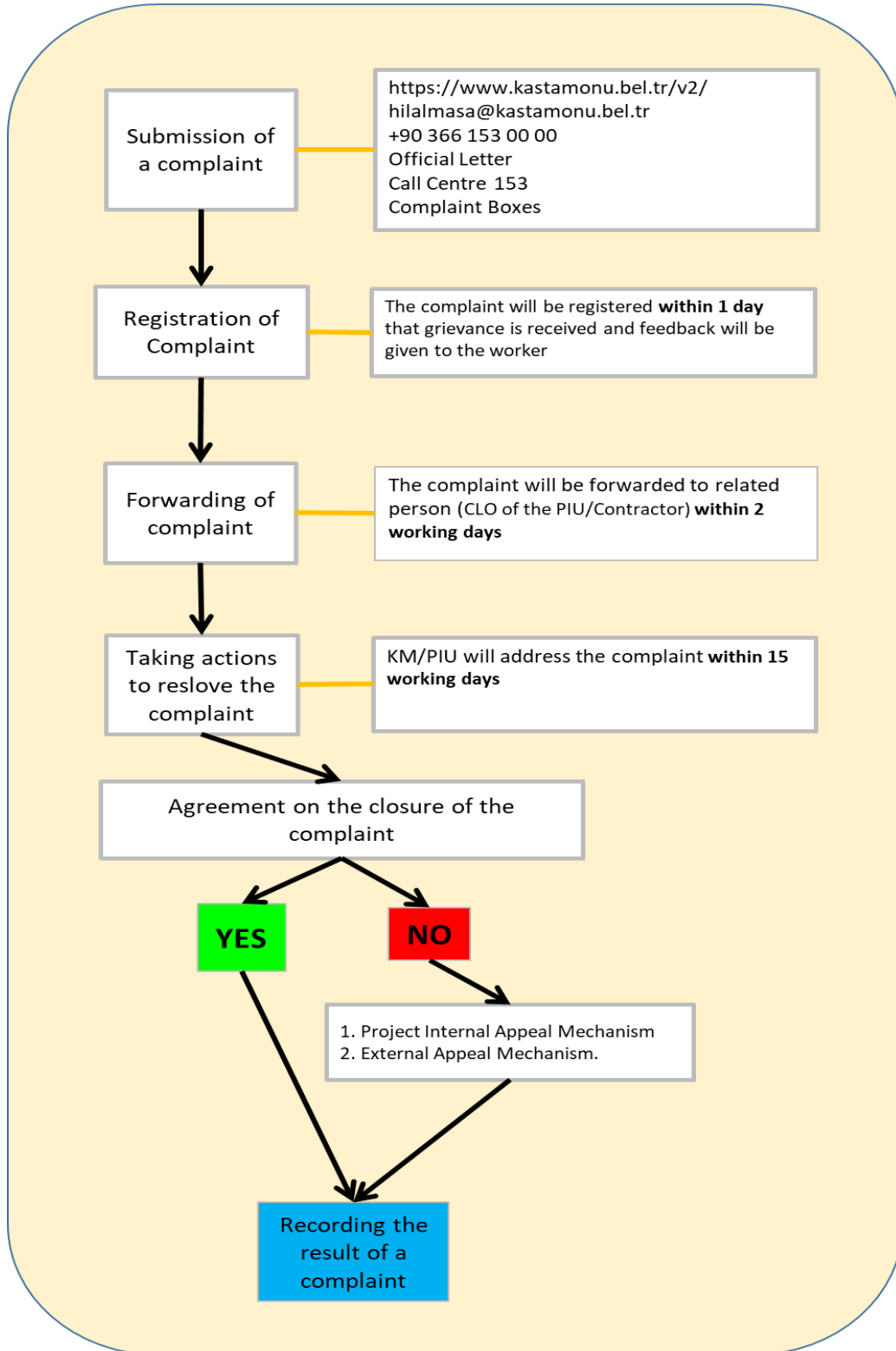


Figure 4 Worker Grievance Mechanism Flowchart

6.4 World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their grievances to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank's corporate GRS is provided in the WB website: <http://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redress-service>. Information on how to submit complaints to the WB Inspection Panel can be reached through its website: www.inspectionpanel.org.

7 Monitoring and Reporting

This SEP is a living document, periodically (at least once every 6 months) review and update of the SEP will be conducted, as necessary, during the stakeholder consultation as required within the scope of SEP implementation. KM PIU and the Contractor CLO will record all incoming corporate grievance/comment to the databases. KM will inform on any changes made in SEP.

KM PIU and ILBANK will monitor participation of the stakeholders in the planned engagement activities. Through evaluation of outcomes and effect of engagement, PIU intends to obtain regular feedback from stakeholders via some of the planned engagement activities which are given in Chapter 4 and effective usage of Grievance Mechanism and its different communication tools which are given in Chapter 6 and to learn if the planned outcomes are achieved or if there is a need for changing the approach. The SEP monitoring framework is described in Table 8.

Table 8. SEP Monitoring Framework

| Parameter | Phase | Indicators | Frequency | Responsible Party |
|--------------------------------|--------------|---|-----------|----------------------|
| Stakeholder engagement process | Construction | <ul style="list-style-type: none"> Number of planned meetings (e.g., public consultation, meeting with authorities, focus group meetings, in-depth meetings, etc.) Type of planned Stakeholder Engament Activities(e.g., public consultation, meeting with authorities, focus group meetings, in-depth meetings, etc.) | Monthly | KM PIU Contractor |
| | Operation | <ul style="list-style-type: none"> Number of stakeholders engaged persons Number of the visits to the settlements affected by the Project activities Type of participant stakeholders (Activity records, meeting minutes, participant records and related reports, documents etc.) | Quarterly | KM PIU |
| Project GM | Construction | <ul style="list-style-type: none"> Number of grievances/comments received (distribution to be made according to gender, settlement, category of grievance, status of grievance) Types of the grievances/comments (community H&S, employment, local procurement etc.) | Monthly | KM PIU Contractor |
| | Operation | <ul style="list-style-type: none"> Timeframes for response to each grievance Number and percentage of open or closed grievances (Grievance forms, database, other online and offline communication methods etc.) Number of invalid grievances (Grievance forms, database, other online and offline communication methods etc.) | Quarterly | KM PIU |
| Worker GM | Construction | <ul style="list-style-type: none"> Number of grievances/comments received by workers Types of the grievances/comments regarding worker management and working conditions (e.g. Worker rights, OHS, etc.) | Monthly | KM PIU Contractor |
| | Operation | <ul style="list-style-type: none"> Number of Grievances Received (by gender and category of grievance) Timeframes for response to each grievance Number of open or closed grievances Number of invalid grievances (Grievance forms, other online and offline communication methods etc.) | Quarterly | KM PIU |

7.1 Reporting Back to Stakeholder Groups

PIU Team will register and report the feedback received from communities, local authorities, landowners, other companies, NGOs, media, academic institutions and other interest groups on a systematic basis through an effective consultation and GM, which is developed and will be used by

contractors/subcontractors of the Project throughout its lifetime to ILBANK. Monitoring of the grievances received will be performed by means of grievance register (Annex-5).

The PIU Team will provide a statistical and qualitative analysis of feedback and complaints as well as their outcomes on a monthly basis to the Supervision Consultant who will review it and disseminate it to the Ethics Committee, Head of Department of International Relations and the Deputy General Director of ILBANK Department of International Relation. In addition, the relevant complaints and their actual status will be reported in ESMRs. The reports will only include information regarding the complaint as much as necessary, and any personal information on the individuals having used the GM will remain confidential and will never be shared in these reports.


A summary of the implementation of the stakeholder engagement activities will be provided to the public on a quarterly basis through the official website of the Kastamonu Municipality (<https://www.kastamonu.bel.tr/v2/>) to show that the stakeholder engagement activities and processes are being implemented. The summary will be published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data.

8 Annexes


Annex 1 – Photos of Interviewees




Annex – 2 Grievance Form

| | | |
|--|--|---|
|  | KASTAMONU MUNICIPALITY Project Code: Kastamonu Drinking Water Distribution Network and Sewerage Network Projects | |
| | GRIEVANCE FORM | |
| Person Filling the Form: | Date: | |
| Interview Agenda: | Reference No: | |
| 1. INFORMATION ABOUT THE COMPLAINANT | | |
| Name Surname: <i>If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.</i> | How to receive the complaint | |
| Turkish ID Number: | Phone | <input type="checkbox"/> |
| Phone: | Face to face | <input type="checkbox"/> |
| Address: | Website/ E-Mail | <input type="checkbox"/> |
| Email: | Other (Explain) | <input type="checkbox"/> |
| Stakeholder Type | | |
| Public Institution <input type="checkbox"/> | Project Affected People <input type="checkbox"/> | Private Enterprise <input type="checkbox"/> |
| Interest Groups <input type="checkbox"/> | Industry Association <input type="checkbox"/> | Workers' Union <input type="checkbox"/> |
| | | Trade Association <input type="checkbox"/> |
| | | Media <input type="checkbox"/> |
| | | NGO <input type="checkbox"/> |
| | | University <input type="checkbox"/> |
| 2. DETAILED INFORMATION ON THE GRIEVANCE | | |
| Description of the Grievance: | | |
| Resolution method requested by the Complainant: | | |
| Registered Person Name Surname/Signature | Complainant Name Surname/Signature | |

Annex – 3 Consultation Form

| | | | | | |
|---|--|-----------------------|-------------------------------|--------------------------|--------------------------|
|  | KASTAMONU MUNICIPALITY Project Code: Kastamonu Drinking Water Distribution Network and Sewerage Network Projects | | | | |
| | CONSULTATION FORM | | | | |
| Person Filling out the Form: | | | Date and time: | | |
| Meeting Agenda: | | | Consultation Registration No: | | |
| 1. CONSULTATION INFORMATION | | | | | |
| Consulted Institution\Person: | | | Communication Type | | |
| Name-Surname of the Interviewee: | | | Phone / Hotline | <input type="checkbox"/> | |
| Phone: | | | Face to Face Meeting | <input type="checkbox"/> | |
| Address: | | | Website / E-mail | <input type="checkbox"/> | |
| Email: | | | Other (Explain) | <input type="checkbox"/> | |
| Stakeholder Type: | | | | | |
| Public Institution | <input type="checkbox"/> | PAP | <input type="checkbox"/> | Private Enterprise | <input type="checkbox"/> |
| Professional Chamber | <input type="checkbox"/> | NGO | <input type="checkbox"/> | University | <input type="checkbox"/> |
| Interest Groups | <input type="checkbox"/> | Industry Associations | <input type="checkbox"/> | Labor Unions | <input type="checkbox"/> |
| Media | <input type="checkbox"/> | | | | |
| 2. CONSULTATION DETAILS | | | | | |
| Questions about the Project: | | | | | |
| Project concerns/feedback: | | | | | |
| Responses to the views expressed above: | | | | | |
| Recorded by Name-Last Name/Signature | | | | | |

Annex – 4 Grievance Closeout Form

| | | |
|---|--|--|
|  | KASTAMONU MUNICIPALITY Project Code: Kastamonu Drinking Water Distribution Network and Sewerage Network Projects | |
| | GRIEVANCE CLOSE OUT FORM | |
| Reference No: | | |
| 1. DETERMINATION OF CORRECTIVE ACTION | | |
| 1 | | |
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |
| Responsible Departments | | |
| 2. CLOSE OUT THE GRIEVANCE | | |
| <i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved.</i> | | |
| Date: /...../..... | Name Surname / Signature of the Person Closing the Complaint | Name Surname / Signature of Complainant |

Annex 5 – Grievance Register

| No | Complaint Register Number | How Complaint is Received (Grievance Form, Community Meeting, Telephone) | Level of Grievance (Municipality/Utility Level, Regional) | Date of Complaint Received | Location of Complaint Received | Name of Person Receiving Grievance | Land Parcel # (If complaint is related to land) | Complainant Information | | | | | Project Component Related to Complaint | Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.) | Complaint Summary | Grievance Status (open, closed or pending) | Action Taken | | | | Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol) |
|----|---------------------------|--|---|----------------------------|--------------------------------|------------------------------------|---|-------------------------|-----------|------------------|------------------|--------|--|---|-------------------|--|-------------------------------|----------------|--|----------------------|---|
| | | | | | | | | Name/Surname | ID Number | Telephone/ email | Village-District | Gender | | | | | Responsible Person/Department | Action Planned | Due Date of the Addressing the Grievance | Date of Action Taken | |
| 1 | | | | | | | | | | | | | | | | | | | | | |

Annex 6 – Stakeholder Engagement Log Template

| | |
|--|--|
| Date of Last Revision (Son Revizyon Tarihi) | |
| Person who made the Last Revision (Son Revizyonu Yapan Kişi) | |

| A. General Information on Stakeholder Engagement Activities Paydaş Katılımı Faaliyetleri Hakkında Genel Bilgiler | | | | | | B. Information on Stakeholder Engaged With / Consulted İstişare Edilen Kişi / Kişilere ait Bilgiler | | | | |
|---|------------|-----------|-----------|--|---|--|--|---|--|--|
| Ref. No | Date Tarih | Place Yer | Time Saat | ILBANK Project in relation to the Grievance / Feedback Şikayet/Geri Bildirimin ilgili olduğu ILBANK Projesi/Alt-projesi | ILBANK Subproject in relation to the Grievance / Feedback Şikayet/Geri Bildirimin ilgili olduğu ILBANK Projesi/Alt-projesi | Type of Stakeholder Paydaş Tipi | Name of Stakeholder(s) Paydaşların İsmi | Definition of the Stakeholder Paydaşın/ Paydaşların Tarifi | Number of People Engaged with / Consulted Görüşülen Kişi Sayısı | Contact Details of the Stakeholder Paydaşa ait İletişim Bilgileri |
| | | | | | | | | | | |
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C. Engagement / Consultation Details
İstişare Detayları

D. Follow-up Actions (to be filled in case Follow-up Action Required)
Alınacak Aksiyonlar (Bu kısım, Aksiyon Gerekmesi halinde doldurulacaktır)

| Engagement/ Consultation Method <i>İstişare Yöntemi</i> | Purpose of Consultation <i>İstişarenin Amacı</i> | ILBANK/Project / Subproject Representative who Conducted Engagement/ Consultation <i>Görüşmeyi Gerçekleştiren ILBANK/Proje/Alt proje Temsilcisi</i> | Engagement / Consultation Subject <i>İstişare Konusu</i> | Details / Notes <i>Detaylar / Notlar</i> | Follow-up Action Required <i>İstişare Sonrası Alınacak bir Aksiyon Olup Olmadığı</i> | Action to be taken after the Engagement Consultation <i>İstişare Sonrası Alınacak Aksiyon</i> | Responsible Party for the Action <i>Aksiyondan Sorumlu Taraf</i> | Name of the Responsible Person for the Action <i>Aksiyonun Alınmasından Sorumlu Kişi</i> | Due Date for Action <i>Aksiyonun Tamamlanacağı Tarihi</i> | Action Status <i>Aksiyonun Durumu</i> | Completion Date for Action <i>Aksiyonun Tamamlandığı Tarihi</i> | Related / Supplementary Documents to be Registered in the Database <i>Veritabanına Yüklenecek Destekleyici Dokümanlar</i> |
|--|--|---|---|--|---|--|---|--|---|--|--|---|
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