



**TÜRKİYE ORGANIZED INDUSTRIAL ZONES PROJECT
CONSULTANCY SERVICES FOR PREPARATION OF ENVIRONMENTAL AND
SOCIAL ASSESSMENT STUDIES FOR SUB-PROJECTS (GROUP-3)**

**TRABZON ARSİN ORGANIZED INDUSTRIAL ZONE
SOLAR POWER PLANT PROJECT
STAKEHOLDER ENGAGEMENT PLAN (SEP)
CNR-PLN-TOIZP-TRA-SPP-SEP-001**

**JULY 2024
(Rev.02)**



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Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 3 / 48

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TABLE OF CONTENTS

TABLE OF CONTENTS	4
LIST OF TABLES	5
LIST OF FIGURES	6
LIST OF ABBREVIATIONS	7
EXECUTIVE SUMMARY	9
1. Introduction / Project Description.....	10
1.1 Objectives	10
1.2 Components.....	10
1.3 Location	11
1.4 Area of Influence	11
2. Objective / Description of SEP.....	14
3. Stakeholder identification and analysis.....	15
3.1 Methodology.....	17
3.2 Project Affected Parties and Other Interested Parties.....	18
3.3 Disadvantaged/Vulnerable Individuals or Groups	20
4. Stakeholder Engagement Program.....	22
4.1 Summary of Stakeholder Engagement During Project Preparation	22
4.2 Summary of Previous Stakeholder Engagement Activities	22
4.3 Stakeholder Engagement Plan.....	22
5. Resources and Responsibilities for implementing stakeholder engagement activities ...	28
5.1 Resources.....	28
5.2 Management Functions and Responsibilities.....	28
6. Grievance Mechanism.....	30
6.1 GM at National Level.....	30
6.2 GM at International Level	31
6.3 Project Level GM.....	31
6.3.1 Existing Grievance Mechanism of the TAOIZ	32
6.3.2 Workers' Grievance Mechanism.....	33
6.4 MoIT Level GM.....	33
7. Monitoring and Reporting	36
7.1 Summary on Monitoring and Reporting of SEP Implementation	36
7.2 Reporting Back to Stakeholder Groups	36
ANNEXES.....	38

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 5 / 48

LIST OF TABLES

Table 1. Distance of the Carports from the Nearest Settlement and Sensitive Receptors.....15

Table 2. Identification of Stakeholders.....18

Table 3. Findings and Observations gathered from Stakeholder Interview on 18.12.2023....23

Table 4. Stakeholder Engagement Plan26

Table 5. Roles and Responsibilities.....28

Table 6. Contact details for Türkiye OIZ Project31

Table 7. Grievance Mechanism Implementation.....34

Table 8. Monitoring Plan.....37

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 6 / 48

LIST OF FIGURES

Figure 1: Area of Influence12

Figure 2: Project Location Map.....13

Figure 1: Existing Complaint Form of TAOIZ33

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 7 / 48

LIST OF ABBREVIATIONS

Aol	Area of Influence
CİMER	Presidency's Communication Center (Türkiye Cumhuriyeti Cumhurbaşkanlığı İletişim Merkezi)
CLO	Community Liaison Officer
CRPD	Convention on the Rights of Persons with Disabilities
DOKA	Eastern Black Sea Development Agency (Doğu Karadeniz Kalkınma Ajansı)
DVIG	Disadvantaged / Vulnerable Individuals or Groups
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
GBV	Gender-Based Violence
GM	Grievance Mechanism
HR	Human Resources
IASC	Inter-Agency Standing Committee
IBRD	International Bank for Reconstruction and Development
IDA	International Development Association
IPF	Investment Project Financing
İŞKUR	Turkish Employment Agency (Türkiye İş Kurumu)
KPI	Key Performance Indicator
KVKK	Law on the Protection of Personal Data
LMP	Labor Management Procedure
LM Plan	Labor Management Plan
MESEM	Vocational Training Center (Mesleki Eğitim Merkezi)
MoIT	Republic of Türkiye Ministry of Industry and Technology
MoM	Minutes of Meeting
MTAL	Vocational and Technical Anatolian High School (Mesleki ve Teknik Anadolu Lisesi)
NGO	Non-governmental organization
OHS	Occupational Health and Safety
OIP	Other Interested Parties
OIZ	Organized Industrial Zone
OSB	Organize Sanayi Bölgesi
OSBÜK	Organized Industrial Zones Union
PAP	Project Affected Parties
PIU	Project Implementation Unit
PMU	Project Management Unit
PV	Photovoltaic
R&D	Research and Development (Ar-Ge)
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 8 / 48

SH	Sexual Harassment
SMS	Short Message Service
SPP	Solar Power Plant
TAOIZ	Trabzon Arsin Organized Industrial Zone
TAOSB	Trabzon Arsin Organize Sanayi Bölgesi
TOIZ	Türkiye Organized Industrial Zones
TOIZP	Türkiye Organized Industrial Zones Project
WB	World Bank
WBG	World Bank Group
YİMER	Foreigners Communication Center (Yabancılar İletişim Merkezi)

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 9 / 48

EXECUTIVE SUMMARY

This Stakeholder Engagement Plan (SEP) is designed to facilitate continuous communication with individuals impacted by the project and other concerned parties throughout the execution of the "Trabzon Arsin Organized Industrial Zone Solar Power Plant Project" (referred to as "the Project"). This initiative is part of the Türkiye Organized Industrial Zones Project (TOIZP), which is implemented by the Republic of Türkiye Ministry of Industry and Technology (MoIT) (referred to as the "Main Project"). The overarching goal of the "Main Project" is to enhance the efficiency, environmental sustainability, and competitiveness of specific Organized Industrial Zones (OIZs) in Türkiye. The principal objectives of "the Project" to be established within the boundaries of Trabzon Arsin Organized Industrial Zone (TAOIZ) in Arsin district of Trabzon province are the energy saving (annual MW_n) from OIZ investments in basic and green infrastructure and reduction in CO₂ emissions due to supported investments.

The World Bank is the financial institution providing funding to the Project. The Project Owner is TAOIZ which under the oversight of the Ministry, will implement the Project through a Project Management Unit (PMU) .

SEP is a comprehensive document that guides the identification, engagement, and management of stakeholders throughout a project or initiative. It covers key aspects such as identifying stakeholders, developing strategies for engagement, outlining communication plans, describing governance structures, assigning institutional responsibilities, and establishing mechanisms for monitoring and evaluation. The SEP ensures transparency, fosters trust, and facilitates effective communication and collaboration with stakeholders to achieve project objectives.

Among the key stakeholders of TAOIZ are the regional development agency Eastern Black Sea Development Agency (DOKA), Trabzon Chamber of Commerce, and Yeşilyalı Neighborhood. The project to be implemented within TAOIZ is expected to have significant effects during the construction phase, particularly on TAOIZ administration building employees, employees of the two companies operating in TAOIZ building, the parking area adjacent to Gündoğdu Furniture, and the Trabzon Arsin Organize Sanayi Bölgesi (TAOSB) Mosque.

The Grievance Mechanism (GM) is an essential part of the SEP, and by strengthening its existing GM, the project can be effectively utilized.

Access to a GM is an essential part of SEP. The project aims to strengthen the existing GM used in the project and create a GM that provides access and usage opportunities for all stakeholders to raise requests to the project management.

The scope of this SEP is described in the relevant section as follows:

- The project area and its Area of Influence (AoI) have been identified in line with the components of the project.
- Project-specific stakeholders have been identified as those potentially affected by the project and other parties interested in the project, including vulnerable groups.
- Information, especially E&S-related risks of the project, that will be disclosed has been determined using appropriate informative techniques.
- A plan for stakeholder engagement throughout the project has been prepared
- The resources used for the management of the engagement process have been explained.
- Grievance mechanisms have been identified as a primary feedback source, including the Worker's Grievance Mechanism.
- All informative techniques will be utilized for monitoring and reporting to track stakeholder engagement processes.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 10 / 48

1. INTRODUCTION / PROJECT DESCRIPTION

The project will be implemented in the parking lot area next to the administrative building of the TAOIZ. The right to use the parking lot belongs to the TAOIZ management. For the system to be installed, 500 photovoltaic (PV) solar energy panels and a total of three (3) inverters of different capacities (1x50 kW+2x100 kW) and their necessary connections will be installed at the parking lot belonging to TAOIZ Directorate. The SPP will have a total capacity of 275 kWp/250 kWe, which can generate an average of 270,000 kWh electricity annually.

The construction period will last for six (4) months (120 days) and considering that the excavation works will take 5 days. Four (4) personnel will be employed during the construction phase and three (3) personnel will be employed during the operation phase of the Project.

1.1 Objectives

TAOIZ Directorate aims to increase the share of renewable energy in total energy use, to reduce energy costs and to benefit more from renewable energy types that will contribute to reducing greenhouse gas emissions. In addition, the TAOIZ legal entity has the aim of eliminating electricity energy costs.

This Project-specific SEP is intended as a public document open to discussion with stakeholders and subject to regular updates to reflect the outcomes of ongoing engagement.

The SEP comprises the following components:

- Explanation of the SEP's objectives
- A brief description of the Project
- An overview of relevant stakeholder engagement standards, including World Bank requirements
- A summary of previous stakeholder engagement activities carried out by the Project to date
- Identification of Project stakeholders and their categorization
- Plan for future Stakeholder Engagements (focus, timing, target groups)
- Description of methods for future engagement
- Roles and responsibilities for the effective implementation of the SEP
- Grievance Mechanism for lodging and addressing complaints and feedback from external and internal stakeholders
- Means of monitoring and reporting

TOIZ invites its stakeholders to actively participate in making this SEP an interactive and dynamic document. The organization welcomes feedback on the proposed engagement process.

1.2 Components

The carport shown in Photograph 1 is located within the SPP project area and was built as an example for this Project. It belongs to the OIZ management. Currently, this SPP is in operation. The project will be implemented with the enlargement of this structure.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 11 / 48



Photograph 1. Existing Carport Structure in the Project Area

1.3 Location

The Project area is located within the boundaries of TAOIZ that is situated in Arsin district of Trabzon province, on an area of approximately 1,519 m².

Arsin district is located 20 km east of Trabzon province on the Trabzon-Rize coastline. It is surrounded by Araklı district to the east, Yomra district to the west, Black Sea to the north and Yağmurdere sub-district of Gümüşhane province to the south. There is a 7 km seacoast with the Black Sea, a 28 km land border with Yomra district to the west, and a 35 km land border with Araklı district to the east (see Figure 2).

1.4 Area of Influence

The environmental and social area of influence (Aol) of the project has been determined as 150 m-radius from the Project area, considering the air quality and noise impacts (see Figure 1), especially sensitive receptors in the vicinity of the project area. The social Aol is determined by considering the sensitive receptors which are mosque, hotel, furniture factory, laboratory, and school.

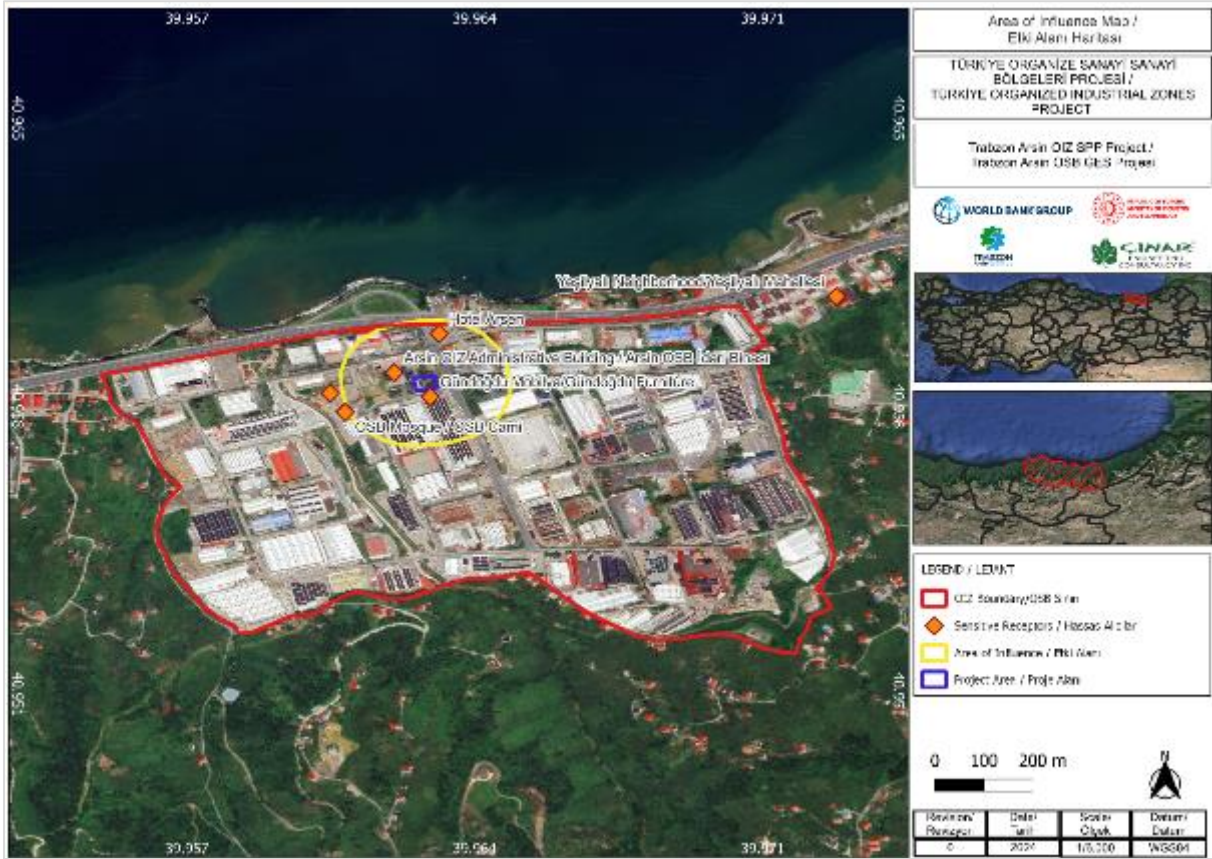


Figure 1: Area of Influence

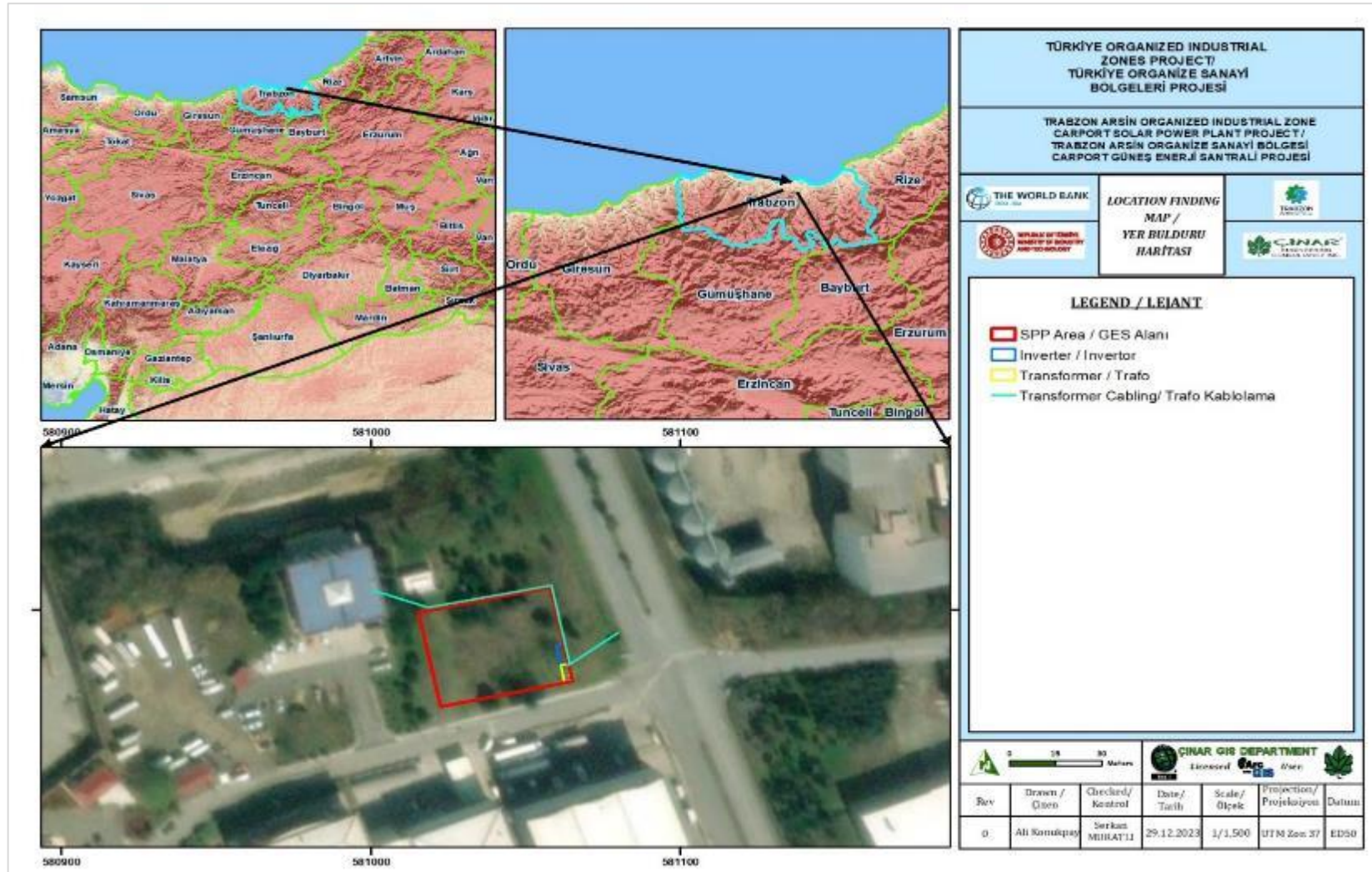


Figure 2: Project Location Map

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 14 / 48

2. OBJECTIVE / DESCRIPTION OF SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The primary aim of the SEP is to guarantee the engagement with of all relevant parties, including individuals, groups, and organizations, who may be impacted by or have an interest in the project. It ensures that there is a continuous flow of information between these stakeholders and the project throughout its duration. Stakeholder engagement plays a crucial role in the project because it allows stakeholders to stay informed at every project stage, voice their expectations and concerns, and it establishes an open communication channel with the project's investor. The general objectives of the SEP encompass:

- To disclose appropriate project information on Environmental and Social (E&S) risks and impacts in a timely, understandable, accessible and appropriate manner and format
- Identifying stakeholders directly or indirectly affected by or interested in the project, including the vulnerable/disadvantaged individuals/groups.
- Planning and implementing inclusive stakeholder engagement activities from the project's preparation and planning phase to its construction and operation phases.
- Determining the frequency and extent of information disclosure, as well as the content of consultation activities.
- Establishing a Grievance Mechanism (GM) to facilitate open communication with stakeholders throughout the project's lifecycle.
- Ensuring that concerns and expectations raised by stakeholders are considered in stakeholder consultations and during project decision-making and planning stages.

The initial aspect of the SEP is meaningful consultation. A meaningful consultation;

- starts early in the project planning phase to gather initial opinions on the project proposal and guide project design.
- promotes stakeholder feedback, especially to inform project design and involve stakeholders in identifying and addressing environmental and social risks and impacts.
- continues regularly as risks and impacts emerge.
- relies on the prior disclosure and distribution of adequate, relevant, clear, unbiased, meaningful, and easily accessible information within a timeframe that allows meaningful consultations with stakeholders. This information is presented in a culturally appropriate format, in relevant local language(s), and is understandable to stakeholders.
- takes stakeholders' concerns and questions into account and responds to feedback.
- actively supports inclusive engagement with project-affected parties.
- is devoid of external manipulation, interference, coercion, discrimination, and intimidation.
- Consultations minutes prepared and disclosed..

The SEP has been developed to adhere to both national legal requirements and international standards, especially the ESS10 of the WB. The project will be executed in compliance with national legislation, the ESMF of TOIZ Project and international standards (see also **Annex-5**)

This Project-specific SEP is intended as a public document open to discussion with stakeholders and subject to regular updates to reflect the outcomes of ongoing engagement.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In the World Bank's Environmental and Social Framework, under the standard "ESS10: Stakeholder Engagement and Information Disclosure," the headings that form guidelines for the SEP are explained sequentially. The titles used for stakeholder identification and analysis are discussed in detail, and the relationship of these terms to the Project is elaborately defined under sections 3.2 and 3.3.

In summary, these stakeholders are as follows:

Project Affected Parties: The term encompasses those who are likely to experience the impacts or potential risks to their physical environment, health, security, cultural practices, well-being, livelihoods or otherwise due to the project. These stakeholders may comprise individuals or groups, including local communities.

Other Interested Parties: The term refers to individuals, groups, or organizations with an interest in the project. This interest may stem from the project's location, characteristics, impacts, or matters related to public interest. Examples of such parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups.

Disadvantaged or Vulnerable Groups: The term pertains to individuals or groups who are at a higher risk of being negatively impacted by the project's effects and may face more constraints than others in harnessing the benefits of a project. Such individuals or groups are also more prone to exclusion from or limitations in their ability to fully participate in the regular consultation process. Consequently, they may necessitate specific measures and assistance to engage effectively. This approach will consider factors related to age, encompassing both the elderly and minors, particularly in situations where they may be separated from their family, community, or other individuals upon whom they depend.

Especially, project affected parties and vulnerable groups are related to distances between project area and the nearby settlements and facilities. Therefore, these distances are presented in Table 1.

Table 1. Distance of the Carports from the Nearest Settlement and Sensitive Receptors

Sensitive Receptor	Distance to the Project Area (m)	Population / Number of individuals
Gündoğdu Furniture	15.5	400
Neva Environmental Laboratory	19.0	23
UKL Company	19.0	7
Hotel Arsen	100.4	At least 25
OSB ¹ Mosque	131.0	Between 500 and 1,000
Organized Industrial Zone Vocational and Technical Anatolian High School	141.0	359
Yeşilyalı Neighborhood (Nearest Dwelling)	617.0	3,498

The impact area of the Project is determined as a circle with a radius of 150 meters from the Project area. The 150-meter radius impact area has been determined considering environmental and social impacts, especially sensitive receptors in the vicinity of the project

¹ Organize Sanayi Bölgesi (Organized Industrial Zone)

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 16 / 48

area. The impact area includes sensitive areas receptors which are mosque, hotel, furniture factory, laboratory, and school.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 17 / 48

3.1 Methodology

Stakeholder engagement is an ongoing and dynamic process that should be initiated even before the development of this SEP and persists throughout the entire life of the project. The Project owner is dedicated to maintaining active and continuous communication with identified stakeholders. The primary goal of SEP is to offer stakeholders prompt and sufficient information regarding the adverse impacts and risks associated with the project; while ensuring they have comprehensive access to express complaints and voice their concerns. This commitment involves sharing of information, especially about social and environmental risk and adverse impacts, and providing a channel for raising concerns and grievances.

In cases where substantial changes occur in the project, introducing new risks and impacts, especially those poised to affect the parties involved, the Project owner will ensure that relevant information about these changes, risks, and impacts is communicated to the concerned parties. Additionally, the Project owner will engage in consultations with the affected parties to collaboratively develop strategies for mitigating these new risks and impacts.

This commitment to ongoing engagement and transparent communication emphasizes the importance of addressing stakeholder concerns, ensuring accountability, and adapting to evolving circumstances in the best interest of the project and its stakeholders.

Stakeholders are individuals or groups who may be directly or indirectly affected by a project, or Other Interested Parties.

3.2 Project Affected Parties and Other Interested Parties

The project affected parties (PAP) and other interested parties (OIP) affected by the project will differ depending on the project phase. The visible environmental impacts during the construction and installation stages of the project will affect employees of the administrative building who use the parking lot, as well as employees and visitors of the two companies situated in the building. The challenges during this period involve difficulties in finding parking spaces and potential noise arising from construction activities.

User of the nearby facilities who will not be able to utilize the existing parking lots will predominantly turn to alternative parking spaces and to the TAOSB mosque's parking lot. Therefore, a low level of difficulty can be anticipated for the TAOSB mosque congregation and users of this parking facility.

According to the findings obtained from the interviews, the TAOIZ building has 17 employees and ten (10) vehicles, NEVA company has 23 employees and approximately seven (7) vehicles, and UKL company has seven (7) employees and four (4) vehicles. The reason for providing approximate numbers of some vehicles is that not all vehicles are expected to be in the building parking lot on the same day.

The expected seven (7) number of workers involved in the project will also be considered stakeholders among those affected by the project. It is anticipated that these workers will use the TAOIZ building for their daily dining routines and the TAOSB Mosque for their hygiene needs. Although there is sufficient space in both mentioned buildings for the services discussed, congestion is anticipated in these areas during the course of the project activities.

Even if satisfactory data from Gündoğdu Furniture stakeholders could not be obtained during the field visit, employees, customers, and visitors of this company may still be considered as potential PAP. Nevertheless, information which has been gathered shows that the company has 10-15 number of cars, and the firm employs nearly 400 personnel.

Similarly, it is crucial that the potential impacts during the construction period of the project for Hotel Arsin should be considered in terms of receptor. Despite limited data from the conversation with Hotel Arsin, it has been learned that the hotel can host around 25 guests in the winter off-season. This capacity is anticipated to rise when the tourism season starts in late February and March due to increased demand from tour companies.

According to the mukhtar of the nearby settlement, since approximately 70% of the TAOIZ area falls within the neighborhood borders, the neighborhood expects to benefit from employment opportunities within TAOIZ. Therefore, the low-rate employment possibilities (seven (7) number of workers) that may arise during the construction and installation phases could be sought after by job seekers in this neighborhood.

The table below provides identification of the abovementioned stakeholders (see Table 2).

Table 2. Identification of Stakeholders

Stakeholders	PAP / OIP / DVIG	Relation	Interest / Concern
Gündoğdu Furniture	PAP	Direct	Nearby company. There is no specific concern. Employees and customers of the company can be affected Project related activities due to the noise and vibration.
Neva Environmental Laboratory	PAP	Direct	The company shares the same building with TAOIZ. There is no specific concern. During the Project related activities parking areas can cause problems based on find free spaces.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 19 / 48

Stakeholders	PAP / OIP / DVIG	Relation	Interest / Concern
UKL Company	PAP	Direct	The company shares the same building with TAOIZ. There is no specific concern. During the Project related activities parking areas can cause problems based on find free spaces.
Hotel Arsin	OIP	Indirect	Nearby accommodation place. There is no expected concern or relation to the Project.
OSB ² Mosque	OIP	Direct	Nearby religious area. There is no specific concern. TAOSB mosque's parking lot can be alternative area to fulfill need of car park.
Organized Industrial Zone OIZ Vocational and Technical Anatolian High School	OIP	Indirect	Nearby educational area. There is no expected concern or relation to the Project.
Yeşilyalı Neighborhood (Nearest Dwelling)	PAP	Direct	Nearby residential area. The neighborhood can expect to benefit from employment opportunities within TAOIZ
Republic of Türkiye Trabzon Governorate Private Trabzon Care Center	Disadvantaged / vulnerable individuals or groups (DVIG)	Indirect	Identified vulnerable group, however there is no expected negative impact on these group.
Arsin Yeşilce Private Education Vocational School	DVIG	Indirect	Identified vulnerable group, however there is no expected negative impact on these group.

In light of the information obtained from the municipality, complaints from nearby settlements regarding the noise generated by construction activities within TAOIZ and occasional odors emanating from the stream discharge point, as indicated, highlight the sensitivity of the surrounding environment. Although the activity is located away from residential areas and does not involve discharge needs, this sensitivity should be considered in the assessment of the construction impact from the perspective of PAP.

One frequently asked question during stakeholder meetings about project awareness was whether there would be power outages during the project. Therefore, workspaces where electricity and internet connectivity are essential will be among the sensitive groups. In particular, both companies and the school within TAOIZ should be informed about potential interruptions.

During both the construction and operational phases of the project, the companies within TAOIZ are expected to be among the primary stakeholders who may express interest in the project. Within TAOIZ, there are a total of 86 companies, with 28% of them involved in food product manufacturing. The other prominent sectors, in descending order, include Rubber and Plastic Products Manufacturing (8%), Primary Metal Industry (8%), Furniture Manufacturing (8%), Printing and Reproduction of Recorded Media (6%), Chemical and Chemical Product Manufacturing (6%), and Other Manufacturing (6%). The remaining approximately 30% encompasses leather, wood, machinery, paper, clothing, electrical equipment manufacturing, as well as the manufacturing of motor vehicles and trailers.

In addition to these, Trabzon Arsin Organized Industrial Zone Vocational and Technical Anatolian High School (TAOSB MTAL) (with 214 students, 30% of them is female) / Trabzon

² Organize Sanayi Bölgesi

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 20 / 48

Arsin OIZ Vocational Training Center (TAOSB MESEM) (with 40 students / all males) are in a relationship with companies due to apprenticeship and mastery programs within TAOSB, will especially hold a stakeholder position during the operational phase of the project. Current number of the students in total is nearly 254, which is accompanied by female nearly with 30%. As should be noted that there are no student-dormitory service within the school area. During the period of the interview, discrepancies were observed between the numbers provided by the school administration and the current numbers on the website³. Therefore, the numbers on the official website are being considered (see Table 1).

Based on the findings obtained from discussions with DOKA and Trabzon Chamber of Commerce, it is anticipated that the OIZ's interest in technological activities and innovations will lead to intensive interaction with these stakeholders. As a result, during the operational phase of the project, both DOKA and the Chamber of Commerce are expected to show close interest in the project.

In addition, along with the PIU and PMU team and project employees, all other businesses within the OIZ, such as neighboring facilities, are also among the stakeholders of the project.

3.3 Disadvantaged/Vulnerable Individuals or Groups

As per ESS10, Disadvantaged or Vulnerable Individuals or Groups (DVIG) encompass those who encounter obstacles or difficulties in fully engaging with society or are more susceptible to risks and vulnerabilities. These challenges may stem from factors like gender, economic situation, social origins, age, disability, or other conditions. Addressing their needs may necessitate tailored assistance, support, or safeguarding measures to safeguard their rights, welfare, and access to equal opportunities.

The comprehensive methodology used in the identification of DVIG can be summarized as follows:

- considering all parties involved or affected,
- reviewing all risks in the context of E&S specifically for vulnerable groups,
- conducting stakeholder consultations conducted before the project, including PMU and PIU,
- identifying gaps, if any, between national and international standards,
- including parties that could positively benefit from the project in the category of vulnerable groups.

However, there is no identified vulnerable group within the project area such as people with disabilities, refugees, as well as non-Turkish speaking people. Besides, there is no identified groups with low-income.

The below identified vulnerable groups have not direct link to Project activities. Therefore, there is no need to specific communication and stakeholder engagement activities:

- Republic of Türkiye Trabzon Governorate Private Trabzon Care Center: The center serves as residential care services for individuals with severe/advanced intellectual disability. The institution has 67 bed capacity. The approximate number of residents can change year by year. Full capacity of the institution can serve over 50 individual⁴.

³ <https://arsinosbmtal.meb.k12.tr/>

⁴ <https://www.aile.gov.tr/trabzon/kuruluslarimiz/ozelkuruluslar/engbakmerkezleri/ot-bakimm/>

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 21 / 48

- Arsin Yeşilce Private Education Vocational School: this vocational school serves individuals with mild intellectual disabilities. Number of the students is 38 with 15 teacher⁵.

⁵ <https://arsinyesilcezelegitim.meb.k12.tr/>

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 22 / 48

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Summary of Stakeholder Engagement During Project Preparation

18.12.2023: The first site visit was realized within the scope of the Environmental and Social Pre-assessment. The representatives of ÇINAR and TAOIZ have also attended both the meeting and site visit.

Full list of the stakeholders engaged on **18.12.2023**, activities are given in **Annex-4** including photographs taken during the interviews.

4.2 Summary of Previous Stakeholder Engagement Activities

Most of the participants given in **Annex-4** have answered questions show interest in understanding the stakeholder engagement and GM. Findings and observations of the interviews in terms of evaluation of stakeholder engagement and GM are listed in Table 3.

4.3 Stakeholder Engagement Plan

In accordance with findings and observations of the interviews (listed in Table 3) in preparation of the ESMP and SEP Project specific Stakeholder Engagement Plan has been constituted and provided in Table 4.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 23 / 48

Table 3. Findings and Observations gathered from Stakeholder Interview on 18.12.2023

Stakeholder	Identification of Stakeholders	Opinions about Stakeholder Engagement	Opinions about Grievance Mechanism
Blue collar employee / TAOIZ Administrative Building / Subcontractor / Female	Direct	Information needs to purpose of the project. Trainings has been suggested as a way of participation	Employees have tendency to conduct face to face consultation instead of GM's tool including complaint boxes
Blue collar employee / TAOIZ Administrative Building / Male	Direct	Project awareness on high level.	Employees have tendency to conduct face to face consultation instead of GM's tool including complaint boxes. I
White collar employee / TAOIZ Administrative Building / Female	Direct	Information dissemination activities are being actively carried out.	There is no complaint.
White collar employee / TAOIZ Administrative Building / Male	Direct	Communication is in sufficient level.	No finding.
NEVA Environmental Laboratory / TAOIZ Administrative Building / Males	Direct	There are concerns related to use of park areas during installation.	No finding.
UKL Uzmanlar Calibration Laboratory / TAOIZ Administrative Building / Females	Direct	There is curiosity about whether there will be power outages and noise during the construction process.	There have been no problems or grievances.
Gündoğdu Furniture / Nearby business / Male	Direct	There are questions regarding relocating parked vehicles during the construction process.	No concern...
TAOSB Mosque / Nearby religious area / Male	Direct	There is no concern or worry about the project activities.	Additional sink and toilet areas are needed. Personnel is needed for cleaning.
Hotel Arsen / Nearby populated place / Male	Indirect	There is no concern about the impact of the project since there are no guests in the hotel during the day.	No complaints.
TAOSB MTAL / TAOSB MESEM / Nearby educational facility / Female	Indirect	The most effective interaction method is suggested to be organizing events within TAOIZ and involving the students in them.	There is no anticipated negative impact.
Mukhtar of Yeşilyalı Neighborhood / Staff of Arsin District Governorship / Male	Indirect	There is a recommendation for further support in terms of employment.	There is concern about land issues related to expropriation in case of TAOIZ expansion.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 24 / 48

Stakeholder	Identification of Stakeholders	Opinions about Stakeholder Engagement	Opinions about Grievance Mechanism
Arsin Municipality / Males	Indirect	The titles containing the topics of interest are as follows: How much electricity will the project generate? Will the generated electricity be used only in the administrative building? Will it be built as a prototype and then developed further?	There are complaints about TAOIZ's inability to effectively integrate with the region.
Trabzon Chamber of Commerce / Male	Indirect	We have approximately 13,000 members. In the region, there are Beşikdüzü, Arsin, Şinik (fish processing facilities), and Vakfıkebir (new) industrial zones. I had heard that this OIZ is a candidate to become a Green Industrial Zone. I had heard that they will transition to renewable energy. I had heard that they received support from DOKA. This information has also been published on their websites. TAOIZ is involved in EU projects. We facilitate partnerships with foreign companies. There have been informational meetings on corporate carbon footprint calculation, and the European Green Deal. TAOIZ and Beşikdüzü OIZ participated in these events. Meetings are held for education, promotion, consultancy, and project proposal calls. We also inform our members about such activities, so TAOIZ can stay updated. There are no communication issues, and requests can be conveyed smoothly. Phone and email are the most commonly used communication channels. For instance, we may have data requests regarding energy efficiency. We conduct our business comfortably. The most effective communication tools in the region are the local media, with 61 Saat ⁶ , Haber 61 ⁷ , Anlık Trabzon ⁸ , and Günebakış ⁹ being at the forefront. To increase communication, it is necessary to update social media accounts regularly. Especially through LinkedIn, Twitter, and Facebook, faster access is provided. The most effective methods of information dissemination are short messages and emails for members. Social media is effective for the target audience. WhatsApp groups can also be useful for industry-specific activities.	There have not been any problems reported by companies

⁶ <https://www.61saat.com/>

⁷ <https://www.haber61.net/>

⁸ <https://www.haberanlik.com.tr/>

⁹ <https://www.gunebakis.com.tr/>

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 25 / 48

Stakeholder	Identification of Stakeholders	Opinions about Stakeholder Engagement	Opinions about Grievance Mechanism
DOKA / Males	Indirect	The most effective communication methods recommended are local press (61 Saat, Haber 61, Günebakış, Anlık Trabzon), social media, and SMS. The most effective communication methods are local press (61 Saat, Haber 61, Günebakış, Anlık Trabzon), social media, and SMS.	The only problem with the TAOIZ is the limited physical space. Corporate communication should be increased.
Trabzon Chamber of Mechanical Engineers / Females	Indirect	There are no issues in communication. Communication is facilitated through email and phone.	There have not been any complaints reported to us regarding issues like noise. There is no specific area where deficiencies have been observed. Risks related to the project may be related to occupational health and safety (OHS) issues.

Table 4. Stakeholder Engagement Plan

Main Topic	Timing	Identification of Targeted Stakeholders	Method used	Location	Frequency	Responsible Party
Identification of E&S and Occupational Health and Safety (OHS) risks and disclosure of precautions	Pre-Construction	PAPs Project workers	Informative meeting Online meetings Surveys and feedback forms	TAOIZ administrative building	Monthly	İvedik OIZ PMU Social specialist Environmental specialist OHS specialist
Identification of E&S and OHS risks and disclosure of precautions	Pre-Construction	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Informative meeting Face to face public consultations Online meetings Open-door meetings Surveys and feedback forms	TAOIZ administrative building Online platform Website	Annual	TAOIZ PMU Social specialist Environmental specialist OHS specialist
Grievance mechanism	Pre-Construction	PAPs, OIPs, DVIG All stakeholders	Announcement of approved SEP via OIZ's website	Online platform Website	Once	TAOIZ PMU MoIT PIU
Grievance mechanism	Pre-Construction	PAPs Project workers	Informative meetings Online meetings Surveys and feedback forms	TAOIZ administrative building Online platform Website	Weekly	TAOIZ PMU Worker representatives of Contractor / Subcontractor
Grievance mechanism	Pre-Construction	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Induction session Face to face public consultations Online meetings Open-door meetings Surveys and feedback forms	TAOIZ administrative building Online platform Website	Once	TAOIZ PMU
Discrimination and harassment SEA / SH GBV	Pre-Construction	PAPs Project workers	Online meetings	Online platform Website	Annual	TAOIZ PMU Social specialist
Identification of E&S and OHS risks and disclosure of precautions	Construction	PAPs Project workers	Informative meeting Face to face public consultations Online meetings Open-door meetings Surveys and feedback forms	TAOIZ administrative building Online platform	Quarterly	TAOIZ PMU Social specialist Environmental specialist OHS specialist
Identification of E&S and OHS risks and disclosure of precautions	Construction	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Informative meeting Face to face public consultations Online meetings Open-door meetings Surveys and feedback forms	TAOIZ administrative building Online platform Website	Annual	TAOIZ PMU Social specialist Environmental specialist OHS specialist
Grievance mechanism	Construction	PAPs, OIPs, DVIG All stakeholders	Announcement of revised SEP, if required	TAOIZ administrative building Online platform Website	Once	TAOIZ PMU MoIT PIU
Grievance mechanism	Construction	PAPs Project workers	Informative meetings	TAOIZ administrative building Online platform	Monthly	TAOIZ PMU Worker representatives of Contractor / Subcontractor
Grievance mechanism	Construction	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Informative meetings	TAOIZ administrative building Online platform	Semi Annual	TAOIZ PMU
Discrimination and harassment SEA / SH GBV	Construction	PAPs Project workers	Online meetings	TAOIZ administrative building Online platform	Annual	TAOIZ PMU Social specialist
Identification of E&S and OHS risks and disclosure of precautions	Operation	PAPs Project workers	Online meetings	TAOIZ administrative building Online platform	Annual	TAOIZ PMU Social specialist Environmental specialist OHS specialist
Identification of E&S and OHS risks and disclosure of precautions	Operation	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Information meeting	TAOIZ administrative building Online platform	Annual	TAOIZ PMU Social specialist Environmental specialist OHS specialist
Grievance mechanism	Operation	PAPs, OIPs, DVIG All stakeholders	Announcement of revised SEP, if required	Online platform Website	Once	TAOIZ PMU MoIT PIU
Grievance mechanism	Operation	PAPs Project workers	Informative meetings	TAOIZ administrative building Online platform	Semi annual	TAOIZ PMU Worker representatives of Contractor / Subcontractor

Main Topic	Timing	Identification of Targeted Stakeholders	Method used	Location	Frequency	Responsible Party
Grievance mechanism	Operation	PAPs, OIPs, DVIG Stakeholders within the TAOIZ boundaries	Informative meetings	TAOIZ administrative building Online platform	Annual	TAOIZ PMU
Discrimination and harassment SEA / SH GBV	Operation	PAPs Project workers	Online meetings	TAOIZ administrative building Online platform	Annual	TAOIZ PMU Social specialist

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

The expenses or costs incurred in carrying out activities related to SEP will be funded or paid using the budget provided by TAOIZ.

The tasks connected to SEP; the funds needed to cover these expenses will come from the budgets that OIZ has allocated for this purpose.

Information and disclosure methods include informative documents, printed and online, and consultation meetings. These can contain the following:

- Brochures, posters, flyers, etc. containing up-to-date information about the project, contractor, and facility. introductory documents produced in the form of and containing informative short notes
- The official website of TAOIZ, where the relevant documents are available online
- Current announcements on the official website of TAOIZ
- Bulletin boards containing warnings and information notes on occupational and environmental health, safety, and security, as well as waste management, which will be placed inside and around the facility
- Request, complaint, and suggestion boxes to be placed in and around the facility
- Regular consultation meetings to be held with local and regional institutions and organizations

5.2 Management Functions and Responsibilities

The Project Owner will provide information about the Project to all parties affected by the Project, especially the affected settlements, local residents, neighboring facilities, local government agencies, and their work force, and will be involved in the process of determining the important issues of the Project. In stakeholder engagement activities, the responsibilities related to the specified administrative main responsibilities and related stakeholders are summarized in Table 5.

Table 5. Roles and Responsibilities

Responsible Entity	Roles and Responsibilities
MoIT PIU	<ul style="list-style-type: none"> • Ensuring that the stakeholder engagement is understood by PMUs and other stakeholders. • Coordinating interface and reporting to/from the World Bank in relation to the implementation of SEP • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions. • Coordinating and monitoring GM focal points in OIZ and contractor level • Implementing social and environmental monitoring • Monitoring SEP implementation through progress reports • Conducting site visits to audit the performance of the OIZs regarding compliance with the provisions set out in the SEP
Project Management Unit (PMU)	<ul style="list-style-type: none"> • Planning and implementation of SEP activities in close collaboration with the MoIT PIU • Informing OIZ's SEP-related activities to the management board of the OIZ • Reporting on the implementation of SEP activities to MoIT PIU <p>Executing the defined grievance mechanism in the SEP properly and informing MoIT PIU about the overall implementation status</p>

Responsible Entity	Roles and Responsibilities
	•
Social Expert	<ul style="list-style-type: none"> • Planning and implementation of SEP activities in close collaboration with the MoIT PIU • Informing OIZ's SEP-related activities to the management board of the OIZ • Reporting on the implementation of SEP activities to MoIT PIU • Executing the defined grievance mechanism in the SEP properly and informing MoIT PIU about the overall implementation status
Environmental Expert'	<ul style="list-style-type: none"> • Participating disclosure process • Participating resolution process
OHS Expert	<ul style="list-style-type: none"> • Participating disclosure process • Participating resolution process
Communication Expert	<ul style="list-style-type: none"> • Executing the defined grievance mechanism in the SEP properly and informing MoIT PIU about the overall implementation status
Monitoring and Evaluation Expert	<ul style="list-style-type: none"> • Monitoring the recording and resolution of grievances, and reporting to PMU • Reporting on the implementation of SEP activities to PMU
Supervision Consultant	<ul style="list-style-type: none"> • Monitoring the contractors' recording and resolution of grievances, and reporting these to OIZ and PIU in their monthly progress reports • Contacting with PIU GM Focal Point for the follow-up of the grievances
Contractor	<ul style="list-style-type: none"> • Informing MoIT PIU and OIZ of any issues related to their engagement with stakeholders. • Informing PMU for environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.) • Developing and implementing a grievance mechanism both for the E&S performance of the project and for their workforce including sub-contractors, before the start of work in compliance with PIU's GM requirements

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 30 / 48

6. GRIEVANCE MECHANISM

The main aim of the grievance mechanism is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM (and also workers' GM) will be effective during the lifespan of the project. It is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project-affected stakeholders, and
- Provide channels for the stakeholders to provide feedback and raise concerns.
- Offer a consultation process that is clear, transparent, culturally sensitive, and easily accessible.
- Provide the option for anonymous complaints and feedback, particularly in cases related to Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH).
- Recognize that grievances concerning community health, safety, and environmental risks may be urgent, especially in cases of accidents, communicable diseases, and pollution. Immediate actions must be taken to address and prevent further harm.

The sample forms can be used to for GM are given in **Annex-1**, **Annex-2**, and **Annex-3**.

6.1 GM at National Level

The internal and external stakeholders (including the foreigners) can apply to the following national level GMs:

The Presidency's Communication Center (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons, and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. The contact information of CIMER is given as follows:

- Website: www.cimer.gov.tr
- Call Centre: 150
- Phone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to Republic of Türkiye, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries, and district governorates.

The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. The contact information of YIMER is given as follows:

- Website: www.yimer.gov.tr
- Call Centre: 157
- Phone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Türkiye, Directorate of Communications

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 31 / 48

- Individual applications at the Republic of Türkiye General Directorate of Migration Management

MoIT Level GM

All stakeholders can submit individual applications to the MoIT grievance mechanism established specifically for the Main Project via ways given in the Table 6

Table 6. Contact details for Türkiye OIZ Project

E-mail	info@sanayi.gov.tr dboneri@sanayi.gov.tr
Website	yesilosb.sanayi.gov.tr
Address	Mustafa Kemal Mahallesi Dumlupınar Bulvarı (Eskişehir Yolu 7.km) 2151. Cadde No:154/A 06530 Çankaya/ANKARA
Phone	444 6 100
Fax	+90 (312) 201 58 23

MoIT receives formal requests and grievances through CIMER. Other than CIMER, MoIT can receive formal grievances either as official petitions or through its online web channels. Per the requirements of the World Bank, an expert will be assigned to function as the GM focal point of the project and will receive grievances regarding the project through all available GMs. The GM will also allow the submission of anonymous grievances through CIMER. GM focal point of the MoIT will act as the central body in handling complaints by coordinating with OIZ GMs and CIMER.

6.2 GM at International Level

World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint 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. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

6.3 Project Level GM

The relevant activities within the Project Level GM are provided in Table 7 and **Hata! Başvuru kaynağı bulunamadı..** Some part of the mentioned communication tools within the Table 7, are given under the following sub-heading.

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 32 / 48

To implement GM, TAOIZ and its contractor's Community Liaison Officer (CLO) will actively listen to complaints made by stakeholders. They will collaborate with relevant units to resolve these issues and will record grievances in the GM.

Employees will have several ways to raise complaints. These way can be listed as toll-free telephone hotline beside the complaint boxes. The resolution of grievances will ideally include the involvement of the worker representative. To facilitate the process, a complaint box will be provided to workers, enabling them to submit request, concern, and complaint forms.

For projects financed by the World Bank, stakeholders will be informed about the guide, which is provided input to projects to design their GMs in a way which live up to those guideline GBV, SEA /SH. Workers will be informed about the possibility of submitting such complaints related to the project on GBV and SEA/SH issues anonymously. Authorities handling complaints should ensure confidentiality of aggrieved party when addressing such issues and apply an unbiased approach.

Grievances related to SEA / SH should be differentiated and reported to relevant institutions. In cases of SEA /SH complaints, attention should be paid to confidentiality and ethical filing information to protect the victim, prevent the disclosure of shared information, and avoid creating new hardships.

Contact Information of TAOIZ

The contact information on TAOIZ official website is presented through a notice, ensuring effective communication with stakeholders. Specific details regarding contact information can be found in the following items.

Official website	https://www.tosbol.org.tr/
Communication section of the webpage	https://www.tosbol.org.tr/iletisim-TR.html
Address	Yeşilyalı Mahallesi Organize Sanayi 9 No'lu Cadde No:21 61900 Arsin Trabzon Türkiye
Telephone	+90 462 711 37 10
Fax	+90 462 711 25 22
e-mail	info@tosbol.org.tr tosbol@hs02.kep.tr

6.3.1 Existing Grievance Mechanism of the TAOIZ

The complaint and suggestion boxes located within the TAOIZ. There are four complaint boxes The external complaint collection channel is via the complaint form available on website (<https://www.tosbol.org.tr/iletisim-EN.html>, <https://www.tosbol.org.tr/itiraz-ve-sikayet-EN.html>)

In addition to these TAOIZ has an Appeals and Complaint Management Procedure. This procedure is implemented via Complaint, Request, and Suggestion Notification Form (see Figure 3


		ŞİKAYET, İSTEK ve ÖNERİ BİLDİRİM FORMU		Doküman Kodu: İE-39
				Yayın Tarihi: 19.11.2015
				Revizyon Tarihi:
				Revizyon No: 00
				Şahıs No: 01
ŞİKAYET, İTİRAZ VEYA ÖNERİDE BULUNAN KİŞİ/KURULUŞ TARAFINDAN DOLDURULACAKDIR				
<input type="checkbox"/> ŞİKAYET <input type="checkbox"/> İTİRAZ <input type="checkbox"/> ÖNERİ				
ADI - SOYADI				
KURULUŞ ADI				
TELEFON NO				
FAX NO				
ŞİKAYET - İTİRAZIN TANIMI / GEREKÇESİ:				
FORMU DOLDURAN ADI SOYADI : TARİH : İMZA :				
.....				
YÖNETİM TEMSİLCİSİ TARAFINDAN DOLDURULACAKTIR				
KAYIT TARİHİ	ÖNCELİK SINIFI	YÜKSEK	NORMAL	DÜŞÜK
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
YAPILACAK/YAPILAN FAALİYETLER				
1.				
2.				
3.				
4.				
MÜŞTERİ BİLGİLENDİRMESİ				
<input type="checkbox"/> YAPILDI -Tarih/Saat/Yöntem				
<input type="checkbox"/> YAPILMADI (Nedeni:				

Figure 3: Existing Complaint Form of TAOIZ

The existing grievance mechanism will be improved and implemented using the recommended approaches and methods outlined in this SEP.

6.3.2 Workers' Grievance Mechanism

In addition to public GM, the ESS 2 requires the establishment of a Workers' Grievance Mechanism (WGM) for the project workers. Constitution of WGM will be under responsibility of the Contractor in accordance with its LM Plan which will be prepared in line with Project's LMP. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. The Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees). Procedural steps of WGM are same as public GM as explained above.

6.4 MoIT Level GM

All stakeholders can submit individual applications to the MoIT grievance mechanism established specifically for the Main Project via following ways. The steps to be followed in the process will be tracked through MOIT GM Procedure:

MoIT	
E-mail	info@sanayi.gov.tr dboneri@sanayi.gov.tr
Website Address	www.sanayi.gov.tr Mustafa Kemal Mahallesi Dumlupınar Bulvarı (Eskişehir Yolu 7.km) 2151. Cadde No:154/A 06530 Çankaya/ANKARA
Phone	444 6 100
Fax	+90 (312) 201 58 23

Table 7. Grievance Mechanism Implementation

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	The GM will become effective in the pre-construction phase. The GM structure is explained in detail under the section 6.	During the construction and operation	TAOIZ PMU Social Specialist and Community Liaison Officer (CLO) MoIT PIU Contractor Supervision consultant
Grievance uptake	In order to foster open communication and ensure a steadfast commitment to addressing stakeholders' concerns promptly and effectively, TAOIZ will be implemented the following steps: 1) A toll-free telephone hotline will be established, providing stakeholders with the opportunity to easily connect with TAOIZ's resolute grievance support team. 2) Stakeholders will be given the option to forward SMS outlining their grievances to TAOIZ's designated SMS line. 3) TAOIZ will actively encourage stakeholders to provide a detailed description of their grievances via e-mail, and the dedicated grievance inbox may be utilized for this purpose. 4) Traditional correspondence will remain a viable option, allowing stakeholders to choose to direct a letter detailing their grievances to the grievance focal points at their local administration. 5) A standardized grievance form (see Annex-1) will be made available for use, and stakeholders will be able to submit it through any of the aforementioned channels, ensuring consistency in information collection. 6) For those who prefer face-to-face interaction, TAOIZ will ease the registration of a grievance in the grievance logbook at any facility. Alternatively, stakeholders will have the choice to drop a written grievance into the complaint boxes located at the administrative building of TAOIZ management. 7) All grievances to be registered in central database to facilitate tracking and analysis	Establishment of continuously active structure without allowing any interruptions	TAOIZ PMU Social Specialist and CLO MoIT PIU Contractor Supervision consultant
Sorting, processing	Any grievance, complaint, feedback, question, suggestion, concern etc. received is sent to the relevant department will be appointed by Project PMU, logged in the project specific GM database, and categorized according to the following inputs: - Project related activities - Project labor force - Issues related to resource use, sustainability, and pollution - Community health and safety issues - Land use and land acquisition - Chance finds - Risk on biodiversity if any - Chance finds if any - Stakeholder engagement	Upon receipt of complaint	MoIT PIU GM Focal Point Contractor Supervision consultant
Acknowledgment and follow-up	The acknowledgment and recording of the complaint are conveyed to the complainant by the unit responsible for receiving and/or addressing the complaint. The responsible party in this case will be Project PMU, appointed by TAOIZ management, and/or GM committee. Feedback is provided to the complainant during the progress of the resolution process, showing the unit where the complaint is being handled and the stage it has reached. The complainant's proposed solution will also be taken into consideration during this process. Throughout this entire process, ensuring correct, effective, and timely communication with stakeholders is crucial for the successful implementation of the resolution process.	Within 2 days of receipt	TAOIZ PMU Social Specialist
Verification, investigation, action	The investigation of the complaint is led by TAOIZ PMU. A proposed resolution is formulated by TAOIZ and communicated to the complainant representative by appointed unit. Throughout this process, TAOIZ PMU and / or GM committee takes the lead in thoroughly evaluating the complaint and finding a fair resolution. In communication with the complainant, the proposed solution is presented in a clear manner, aiming to resolve the complaint fairly and effectively	Within 10 working days	The GM committee will established to evaluate and investigate unresolved complaints, especially in cases of SEA/SH. It is essential that the representative of the victim/survivor be included in the committee. Although the members may have been selected from within the PMU and PIU, the committee will act independently in decision-making. Therefore, independent experts from outside the PMU and PIU should also be included. For cases that have been or may be subject to litigation, a legal advisor and attorney must be included in the committee. Employee representatives, as well as the representatives of the complainant/victim, should also be included in this committee, which includes complaints from employees The committee will be constituted by TAOIZ PMU as supported by MoIT PIU and WB. The committee will consist of a legal representative, appointed members of TAOIZ management, Contractor, Supervision Consultant, and MoIT. In addition, the specified staff as social specialist, OHS specialist, and technical specialists should be included into the Committee including the representative of the complainant
Provision of feedback	When the resolution stage is reached in the complaint process, the relevant action is presented to the complainant for approval. If the complainant is satisfied with the resolution at this stage, the complaint is closed, and the resolution process is started. If	Will be decided by MoIT PIU specialists	GM Committee

Step	Description of Process	Time Frame	Responsibility
	the complainant is not satisfied with the proposed solution, support is provided to the complainant to have a project-internal appeal process. This support may involve seeking recourse to another government agency, engaging in legal proceedings, or involving law enforcement, especially in cases involving sensitive groups such as people with disabilities, minors, individuals in low-income groups, women, or victims of harassment and/or violence.		
Monitoring and evaluation	All records received, recorded, and tracked by TAOIZ PMU will be in the project specific GM database. Records in the database will be filterable by status—open, closed, and ongoing. Moreover, there needs to be an outcome associated with the various record types. For each registered grievance, the approach and result of the GM process should be recorded. Grievances are also registered according to the nature of grievance The analysis should encompass the resolution approaches employed in handled incidents as well. This way, a report will be generated for TAOIZ PMU to refer to in terms of risk, preventive measures, and assessment within the operational process. This report will be submitted to MoIT PIU and WB at specified intervals and will be consistently maintained in a transparent manner for ongoing monitoring. All documents, photos, analysis results, damage assessments, incident reports, and related materials about recorded incidents should also be stored in the system.	Will be decided by MoIT PIU specialists	GM Committee

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 36 / 48

7. MONITORING AND REPORTING

E&S Monitoring Reports to be prepared monthly by the Contractor and submitted to OIZ PMU following the review of Supervision Consultant and then to be submitted to MoIT PIU by TAOIZ PMU on a quarterly basis after reviewing.

Furthermore, the project owner commits to maintaining transparent lines of communication with relevant stakeholders, as dictated by the situation. Any newly identified stakeholders will be added to the stakeholder list, with prompt initiation of communication. In the event of substantial alterations or updates to the project, the project owner will persist in addressing and disseminating information concerning environmental and social concerns to the involved stakeholders. Notifications regarding enhancements, upgrades, and issues pertaining to the environment and society will be conveyed promptly, in accordance with the procedures delineated in this SEP.

The SEP, , will be subject to periodic revisions, particularly in case of significant alterations to the project transpire. These revisions will furnish concise summaries of concerns, issues, and inquiries that have arisen over the preceding year, along with details pertaining to any deviations from initially planned activities or events.

7.1 Summary on Monitoring and Reporting of SEP Implementation

To offer a comprehensive overview of the GM monitoring and reporting processes, Table 8 has been prepared. The table delineates Key Performance Indicators (KPI) and specifies the responsible parties entrusted with this task.

7.2 Reporting Back to Stakeholder Groups

The SEP will be regularly updated as required during the project. Staff members responsible for this will compile periodic reports on stakeholder complaints and inquiries, including the status of corrective actions. These quarterly reports will help assess the number and types of issues and the Project's ability to address them effectively. Information about the Project's public engagement activities can be shared with stakeholders through various communication channels as necessary.

Table 8. Monitoring Plan

KPIs	Requirements	Items Used for Monitoring	Project Phase and Frequency		Responsible Parts for Monitoring	Items used for Reporting	Project Phase and Frequency		Responsible Parts for Reporting	
KPI-01	The recording of all written and verbal feedback The records also include anonymous complaints. The records show both open and closed complaint numbers. Recording the actions taken for closed complaints in the records. Record minutes of meetings (MoM), and trainings (date, subject, number of participants) Photographs (if permissions obtained) Grievance Logs Evaluation of social compliance conditions of Project implementations	Constitution of Project specific GM Constitution of Project specific Worker's GM Preparation of complaint forms Evaluation of registration in Worker's GM	Routine site visits Random face to face interviews with stakeholders Focus group discussion with vulnerable groups Remote consultations with vulnerable groups	Once prior to project activities	Pre-Construction	MoIT PIU Supervision consultant	Distribution of records by type of feedback such as concern, grievance, complaint, question, and suggestion. Number of closed grievance Number of open and ongoing grievance List of applied actions to close grievance	No period	Pre-Construction	Project Owner Contractor PMU of Project Owner Social Specialist
KPI-02	Appointment of CLO Assignment of grievances to relevant departments	Ensure proper staff for stakeholder engagement including vulnerable groups	Regular meetings with CLOs	Continuous	Pre-Construction	MoIT PIU Supervision consultant	Reports of CLOs in monthly, quarterly and semi-annually basis Documentation of the consultation including law cases, if available	Continuous	Pre-Construction	Project Owner Contractor PMU of Project Owner Social Specialist CLOs PR Coordinator
			Weekly	Construction	Semi Annual			Construction		
			Monthly	Operation	Annual			Operation		
KPI-03	The recording of all written and verbal feedback The records also include anonymous complaints.	Constitution of accessible communication tools in any kind Considering language-based handicaps for any kind communication techniques Providing a living document form used in disclosure process Institution of PR office on-site Conducting stakeholder consultations	Routine site visits Random face to face interviews with stakeholders Focus group discussion with vulnerable groups Remote consultations with vulnerable groups	Continuous	Pre-Construction	MoIT PIU Supervision consultant	Distribution of records by type of stakeholders including vulnerable groups Distribution of records by additional language uses, if required	Continuous	Pre-Construction	Project Owner Contractor PMU of Project Owner Social Specialist CLOs PR Coordinator Human Resources (HR) Specialist
			Weekly	Construction	Semi Annual			Construction		
			Monthly	Operation	Annual			Operation		
KPI-04	Monitoring of contractor's activities engaged in GM	Ensure to monitoring of contractor's activities	Regular meetings with CLOs Regular meetings with social specialists of PMU, PIU, Contractor and Supervision consultant	Monthly	Pre-Construction	PMU of Project Owner Supervision Consultant	Records by prepared Contractor's representative within GM process Number of closed grievance recorded by Contractor Number of open and ongoing grievance recorded by Contractor List of applied actions to close grievance recorded by Contractor Reports of Contractor's representative quarterly, semi-annually and annually basis.	Monthly	Pre-Construction	Contractor
			Quarterly	Construction	Quarterly			Construction		
			Semi Annual	Operation	Semi Annual			Operation		

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 38 / 48

ANNEXES

Annex-1 Sample Grievance Submission Form

ŞİKAYET KAYIT FORMU GRIEVANCE SUBMISSION FORM		
Şikayetin Alındığı Yer <i>Location of Grievance Received</i>		Tarih <i>Date</i>
Alan Yetkilinin Adı <i>Name of Person In Charge</i>		Şikayet Kayıt No/ <i>Complaint Register Number</i>
Şikayete Konu Alanın Koordinatları <i>Coordinates of the Area Subject to Grievance</i>		
Şikayet Sahibi Hakkında Bilgi <i>Grievance Info</i> Şikayet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir. <i>The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond.</i>		
Ad Soyad <i>Name Surname</i>		Şikayetin Geliş Yolu <i>Form of Grievance</i>
TC Kimlik No/ <i>Identification Number</i>		Telefon - Ücretsiz hat <i>Phone –Free phone line</i> <input type="checkbox"/>
Telefon / E-Posta <i>Telephone/ E-mail</i>		İstişare Toplantısı <i>Consultation meeting</i> <input type="checkbox"/>
Mahalle – İlçe - İl <i>Neighborhood - District - Province</i>		Dilekçe <i>Petition</i> <input type="checkbox"/>
Posta Kodu <i>Postal Code</i>		Diğer <i>Other</i> <input type="checkbox"/>
Şikayet Detayları <i>Details of Grievance</i>		
Şikayet Konusu <i>Grievance</i>		
Şikayet sahibi tarafından talep edilen çözüm <i>Solution requested by the Complainant</i>		
Şikayeti Alan Yetkilinin Ad Soyad ve İmzası / Şikayet Sahibinin Ad Soyad ve İmzası <i>Name Surname and Signature of the Person In Charge / Name Surname and Signature of Complainant</i>		

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 39 / 48

Annex-2 Sample Grievance Closure Form

ŞİKAYET KAPATMA FORMU <i>GRIEVANCE CLOSURE FORM</i>	
Şikayet Kapatma Numarası: <i>Grievance Closure Number</i>	
Alınması Gereken Acil Önlemleri Tanımlayın: <i>Define Urgent Actions to be Taken:</i>	
Alınması Gereken Uzun Vadeli Önlemleri Tanımlayın (Gerekli İse): <i>Identify Long-Term Actions to Be Taken (If Necessary):</i>	
Tazminat Talebi Bulunuyor Mu? <i>Is There a Claim for Compensation?</i>	Evet / Yes <input type="checkbox"/> Hayır / No <input type="checkbox"/>
Düzeltilici Faaliyetin Kontrolü ve Kararı <i>Control and Decision of Reparative Action</i>	
Düzeltilici Faaliyetin Aşamaları <i>Phases of Reparative Action</i>	Verilen Sürenin Sona Erdiği Tarih ve Yetkili Kuruluşlar <i>The Expiry Date of the Given Period and Authorized Institutions</i>
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.

Annex-3 Sample Grievance Log

		<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>	<i>ID number of Stakeholder</i>
Stakeholder Information	Register Number					
	Date					
	Location					
	Vulnerability (Yes / No) (Please specify)					
Information about Grievance / Complaint / Concern / Question / Feedback	Status of statement					
	Current Condition of statement					
	Summary of statement					
	Actions to be taken					
	Final condition of statement					
Staff Information	Registration					
	Assigned team / staff					
	Documents					
	Comments					

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 41 / 48

Annex-4 List of Stakeholders and Site Photographs

Type of Stakeholders	Name of stakeholder	Identification of Stakeholder	
		PAP / OIP / DVIG	Relation
Project owner	TAOIZ	Project owner	Direct
Bank	World Bank	Lender	Direct
Ministry	Ministry of Industry and Technology	Main Project owner	Direct
Management / Coordination	TAOIZ	Management	Direct
	TAOIZ PMU	Management	Direct
	MoIT PIU	Management	Direct
Project workforce	Direct / Indirect / 3rd parties	PAP	Direct
Supply Chain workforce	Direct / Indirect / 3rd parties	PAP	Direct
Companies within the administrative building	NEVA	PAP	Direct
	UKL	PAP	Direct
Nearby Facilities	Gündoğdu Furniture	PAP	Direct
	Hotel Arsen	OIP	Indirect
Nearby Educational Institution	TAOSB MTAL / TAOSB MESEM	OIP	Indirect
Nearby Religious Area	TAOSB Mosque	OIP	Direct
OIZs	Beşikdüzü OIZ (Trabzon)	OIP	Direct
	Şinik OIZ (Trabzon)	OIP	Direct
	Vakfıkebir OIZ (Trabzon)	OIP	Direct
	Fatsa OIZ (Ordu)	OIP	Indirect
	Ünye OIZ (Ordu)	OIP	Indirect
	Rize Ardeşen OIZ (Rize)	OIP	Indirect
	Giresun 2 OIZ (Giresun)	OIP	Indirect
	Giresun OIZ (Giresun)	OIP	Indirect
	Gümüşhane OIZ	OIP	Indirect
Nearby Settlements	Yeşilyalı Neighborhood / Arsin / Trabzon	PAP	Direct
	Nuroğlu Neighborhood / Arsin / Trabzon	PAP	Direct

Stakeholder Engagement Plan		CNR-PLN-TOIZP-TRA-SPP-SEP-001
Rev.02	Date: July 2024	Page 42 / 48

Type of Stakeholders	Name of stakeholder	Identification of Stakeholder	
		PAP / OIP / DVIG	Relation
	Şenkaya Neighborhood / Arsin / Trabzon	PAP	Direct
	Arsin District / Trabzon	PAP	Direct
	Araklı District / Trabzon	PAP	Direct
	Yomra District / Trabzon	OIP	Indirect
	Ortahisar District / Trabzon	OIP	Indirect
Governorships and municipalities	Trabzon Governorship	OIP	Indirect
	Trabzon Metropolitan Municipality	OIP	Indirect
	Arsin District Governorship	OIP	Indirect
	Arsin Municipality	OIP	Indirect
Relevant institutions	DOKA	OIP	Direct
	Trabzon Chamber of Commerce	OIP	Direct
	İŞKUR ¹⁰	OIP	Direct
	Trabzon Chamber of Mechanical Engineers	OIP	Indirect
	OSBÜK	OIP	Direct
	Republic of Türkiye Trabzon Governorate Private Trabzon Care Center	DVIG	Indirect
	Arsin Yeşilce Private Education Vocational School	DVIG	Indirect
Higher Education	Karadeniz Technical University	OIP	Indirect
	Karadeniz Technical University Arsin Vocational School	OIP	Indirect
Local media	61 Saat	OIP	Indirect
	Haber 61	OIP	Indirect
	Anlık Trabzon	OIP	Indirect
	Günebakış	OIP	Indirect

¹⁰ Turkish Employment Agency











Annex-5 Regulatory Requirements

National Legal Framework	
Name	Information on Regulation
Constitution of the Republic of Türkiye	<p>Citizens and foreigners residing in Turkey, provided that the principle of reciprocity is observed, have the right to apply in writing to the competent authorities and the Grand National Assembly of Turkey regarding their wishes and complaints regarding themselves or the public. The results of the applications regarding them are notified to the petitioners in writing without delay.</p> <p>Everyone has the right to obtain information and apply to the ombudsman.</p> <p>"Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains to more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days."</p>
Law on the Right to Information	<p>Citizens and foreigners resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the administrative authorities and the Grand National Assembly of Türkiye about the requests and complaints concerning themselves or the public.</p> <p>The Law on the Protection of Personal Data in Türkiye, also known as KVKK, regulates the processing of personal data to safeguard individuals' privacy. It defines the roles of data controllers and processors, requires consent for data processing, and mandates purpose limitation. The law grants individuals rights over their data and establishes obligations for data security. It regulates international data transfers and mandates notification of data breaches. An independent Data Protection Authority oversees and enforces compliance with the law. For the most current details, it's recommended to refer to the latest legal resources.</p>
Right of petition, Right to Information and Appeal to the Ombudsperson	<p>Inform the investing public, to get their opinions and suggestions regarding the project, Public Participation Meeting. Participants raise issues related to the Project.</p> <p>As the Project has EIA exemption, the Public Participation Meeting has not been held.</p>
Law on the Protection of Personal Data	
The Environmental Impact Assessment Regulation	

WB ESS		
Name	Information on Regulation	Relevance with the Project
ESS10: Stakeholder Engagement and Information Disclosure	<p>Identifying the project's stakeholders.</p> <p>Assessing the degree of interest and support among stakeholders.</p> <p>Taking into account the perspectives of stakeholders in environmental and social initiatives.</p> <p>Encouraging ongoing engagement with stakeholders throughout the project's lifecycle.</p> <p>Ensuring timely, clear, accessible, and appropriate disclosure of environmental and social risks and impacts to stakeholders.</p> <p>Offering accessible and inclusive mechanisms for raising concerns and grievances and ensuring their response and management.</p>	<p>Project stakeholders, along with their levels of interest and support, are outlined in the Scope section.</p> <p>Ensuring stakeholders are promptly informed about environmental and social risks. Consultations with stakeholders regarding risk reduction and enhancing positive actions are specified within the GM.</p>