

REPUBLIC OF TÜRKİYE
MINISTRY OF AGRICULTURE AND
FORESTRY

DIRECTORATE GENERAL OF
STATE HYDRAULIC WORKS



TÜRKİYE FLOOD AND DROUGHT
MANAGEMENT PROJECT
(P179313)

STAKEHOLDER ENGAGEMENT PLAN
(SEP)

FEBRUARY 9, 2024

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List of Abbreviations and Acronyms

AFAD	: Disaster and Emergency Management Presidency [Afet ve Acil Durum Yönetim Başkanlığı]
CE	: Citizen Engagement
CİMER	: Presidency's Communication Center [Cumhurbaşkanlığı İletişim Merkezi]
COVID-19	: Coronavirus Disease 2019
DSİ	: Directorate General of State Hydraulic Works [Devlet Su İşleri Genel Müdürlüğü]
E&S	: Environmental and Social
EIA	: Environmental Impact Assessment
EPSA	Ex-Post Social Audit
ESCP	: Environmental and Social Commitment Plan
ESF	: (World Bank's) Environmental and Social Framework
ESIA	: Environmental and Social Impact Assessment
ESMF	: Environmental and Social Management Framework
ESMP	: Environmental and Social Management Plan
ESSs	: (World Bank's) Environmental and Social Standards
EWS	: Early Warning System
GM	: Grievance Mechanism
IA	: Implementing Agency
LMP	: Labor Management Procedures
M&E	: Monitoring and Evaluation
MGM	: Turkish State Meteorological Service [Meteoroloji Genel Müdürlüğü]
MoAF	: Ministry of Agriculture and Forestry
NBS	: Nature-Based Solutions
NGO	: Non-Governmental Organization
OGM	: Directorate General of Forestry [Orman Genel Müdürlüğü]
OHS	: Occupational Health and Safety
OIPs	: Other Interested Parties
PAPs	: Project Affected Parties
PDO	: Project Development Objective
PIU	: Project Implementation Unit
POM	: Project Operations Manual
Project	: Türkiye Flood and Drought Management Project
RF	: Resettlement Framework
RP	: Resettlement Plan
SEA/SH	: Sexual Exploitation and Abuse / Sexual Harassment
SEP	: Stakeholder Engagement Plan
SYGM	: Directorate General of Water Management [Su Yönetimi Genel Müdürlüğü]
TATUS	: Flood Forecasting and Early Warning System [Taşkın Tahmini ve Erken Uyarı Sistemi]
TEUS	: Flood Early Warning System [Taşkın Erken Uyarı Sistemi]
ToR	: Terms of Reference
TRGM	: Directorate General of Agricultural Reform [Tarım Reformu Genel Müdürlüğü]
WB	: World Bank
WGM	: Workers' Grievance Mechanism

Executive Summary

The World Bank will be supporting Directorate General of State Hydraulic Works (DSI) and the Directorate General of Water Management (SYGM) under Ministry of Agriculture and Forestry in implementing the Türkiye Flood and Drought Management Project (P179313). **The objective of the Project is to increase access to flood protection for people living in selected areas of Türkiye, and to strengthen the institutional capacity for effective and integrated flood and drought risk management.** The Project will support the following activities: enhancement of flood control infrastructures to mitigate flood risks in selected river basins and improve flood risk management through an optimal combination of structures (e.g., check dams, levees, retaining walls, embankments, bridges, culverts, etc.); piloting applications of nature-based solutions (NBS) and implementation of innovative techniques for flood and drought risk management at river basin scale; review of existing early warning systems (EWSs) to identify gaps and needs and improvement and expansion of existing EWSs; preparation of feasibility studies, designs, and technical documents for implementation of integrated flood risk management at river basin scale with consideration of impact of climate change; improvement of drought monitoring capacity of DSI by expansion of the observational networks for drought monitoring and forecasting; and development of a web portal and associated modelling focusing on agricultural drought.

The Project has four components: Component-1 “Flood Management” (*Subcomponent-1.1 “Flood Control Infrastructure” and Subcomponent-1.2 “Early Warning Systems”*), Component-2 “Drought Management”, Component-3 “Capacity Development and Institutional Strengthening”, Component-4 “Project Management”. Details about the Project are presented in Section 1 of this document.

This **Stakeholder Engagement Plan (SEP)** is developed to outline 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 the project and any activities related to the Project.

Implementation Arrangements. Project Implementation Units (PIUs) will be established at DSI and SYGM, and DSI-PIU will be responsible for overseeing implementation of E&S requirements of the Project at national level including the preparation and monitoring of the SEP since the activities of SYGM will be soft activities.

Monitoring. Stakeholder engagement activities will be monitored periodically and reported in Quarterly Environmental and Social Monitoring Reports by the social specialist of the DSI-PIU to the World Bank.

Grievance Mechanism. To ensure communication with the stakeholders and citizens throughout the Project life cycle, a GM will be established and operated. The Grievance Mechanism (GM) requirements will be regulated in tender documentation and contracts signed with Contractors.

1. Introduction/Project Description

This Stakeholder Engagement Plan (SEP) is developed to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle of the Türkiye Flood and Drought Management Project - P179313 (Project) which will be financed by the World Bank. The project aims to increase access to flood protection for people living in selected areas of Türkiye, and to strengthen the institutional capacity for effective and integrated flood and drought risk management. The Directorate General of State Hydraulic Works (DSI) and the Directorate General of Water Management (SYGM) under the Ministry of Agriculture and Forestry will be implementing the Project activities.

The proposed Project is anticipated to have four components: (i) Flood Management; (ii) Drought Management; (iii) Capacity Development and Institutional Strengthening; and (iv) Project Management. For further information refer to the Project Appraisal Document (PAD) of the Project.

Component 1. Flood Management: The objective of this component is to mitigate the flood risk in selected basins through improvement and expansion of the existing flood control infrastructure and early warning systems (EWSs) in selected parts of Türkiye focusing on Areas of Potential Significant Flood Risk (APSEFR), as per the implementation of the existing Flood Risk Management Plans. This activity will include:

Subcomponent 1.1: Flood Control Infrastructure: This Subcomponent will finance consultancy services, goods, and works related to construction and operation and maintenance (O&M) of flood control structures by DSI to mitigate flood risks in selected river basins and improve flood risk management through an optimal combination of structures (e.g., check dams, levees, retaining walls, embankments, bridges, culverts, etc.). The investments will include both new construction and rehabilitation. The currently selected set of flood control works are located in eight basins—East Black Sea, East Mediterranean, Great Menderes, Kizilirmak, North Aegean, Yesilirmak, West Black Sea, and West Mediterranean. Under this Subcomponent, applications of nature-based solutions (NBS) will be piloted and innovative techniques for flood management will be implemented at river basin scale.

Subcomponent 1.2: Early Warning Systems: This subcomponent will finance (i) extension of Flood Early Warning System (TEUS) maintained by DSI and its monitoring capacity, (ii) strengthening Flood Forecasting and Early Warning Center (TATUM) and Flood Forecasting and Early Warning (TATUS) operated by SYGM, and (iii) assessment of the status and gaps of the EWSs to optimize activities implemented by DSI and SYGM.

Component 2. Drought Management: This Component will support DSI's efforts for drought management through (i) installations of soil moisture sensors and air humidity sensors, and other off-farm near-real time data providers in drought-prone areas to comprehensively assess plant water needs to optimize irrigational water uses, and (ii) development of remote-sensing-supported drought monitor map and Water Accounting platform to help farmers to improve efficiencies in water uses, diversify crop selections, and optimize reservoir operations in coordination with Directorate General Agricultural Reform and SYGM. The Component will also finance consultancy services for preparation of feasibility studies, technical reports and designs to identify future investments for integration of flood and drought management.

Component 3. Capacity Development and Institutional Strengthening: The Department of Flood Control (DoFC) under DSI, needs further institutional strengthening in a few target areas including but not limited to: (i) coordination for flood EWS between DSI and other relevant technical agencies such

as SYGM, Disaster and Emergency Management Presidency (AFAD), and Turkish State Meteorological Service (MGM) where DoFC has leading role in overall EWS planning and coordination, (ii) technical capacity of Flood Modelling Unit to be established under the DoFC responsible for flood protection infrastructure planning and early warning, (iii) incorporation of NBS and public spacing into urban and river flood infrastructure planning and design, and (iv) environmental and social (E&S) safeguards capacity in preparation of required documents associated with investment projects.

Component 4. Project Management: This component will include consulting and non-consulting services, goods, and training for DSI for implementation of the project according to World Bank policies and guidelines. This support will also include establishment of an Environmental and Social Management System (ESMS), preparation of site-specific E&S instruments (e.g. ESIA [Environmental and Social Impact Assessment], ESMP [Environmental and Social Management Plan], RP [Resettlement plan], etc.), preparation of procurement and financial management aspects, technical and contract management, improvement of Monitoring and Evaluation system, technical and contract management improvement of Monitoring and Evaluation (M&E) system.

Implementation Arrangements

The Project will be implemented by DSI and SYGM. While DSI will be responsible for implementing Components 1.1, 1.2, 3 and 4, SYGM will implement some of the activities under subcomponent 1.2. The Project will establish one Project Coordination Unit (PCU) chaired by DSI and two Project Implementation Units (PIUs) – one in DSI and the other in SYGM, governed by a project Deputy Director General. The PIUs will include professional staff from all the DSI and SYGM departments that are relevant to project implementation. In addition, the DSI-PIU will include competitively recruited experts in the areas where DSI staff may not be able to designate sufficient staff. These areas include E&S aspects, financial management, procurement, citizen engagement, and M&E. While most of the DSI-PIU staff will be located at the DSI headquarters in Ankara, DSI-PIU will also include regional staff located in each of the DSI regional directorates corresponding to the Project activities, i.e., each relevant DSI Regional Directorate will have a Coordinator and an E&S Focal Point. These focal points will be responsible for regular supervision of construction, O&M, and the E&S aspects of the activities.

The Project is being prepared under the World Bank's Environment and Social Framework (ESF).

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 DSI-PIU will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

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3. Stakeholder Identification and Analysis per Project Component

3.1. Methodology

For the Project, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2. Affected Parties

Affected Parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

- Component 1. Flood Management (IAs: DSI and SYGM; SAs: AFAD and MGM)
 - Communities living within the impact area of the possible flood.
 - Communities (and businesses) living within the area of impact of the rehabilitation or construction of flood control structures.
 - Owners and formal or informal users of the lands that will be expropriated.
 - People whose livelihoods will be affected by the rehabilitation or construction of flood control infrastructures (i.e., fishermen).
 - Seasonal workers who will be attracted to the potential labor benefits of the Project.
 - People from surrounding villages who may be potential sources of labor.
 - Village cooperatives/associations.
 - People's organizations and institutions affected by the project, such as village development associations, recreational groups, women's groups, farming and fishing cooperatives, and religious groups.
- Component 2. Drought Management (IA: DSI; SAs: SYGM and TRGM)
 - Communities living within the impact area of the possible drought.
 - Farmers
 - Irrigation associations
 - Village cooperatives/associations
- Component 3. Capacity Development and Institutional Strengthening (IAs: DSI and SYGM; SAs: AFAD and MGM)
 - Practitioners of the guidelines, manuals and standard operational procedures that will be prepared.

3.3. Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Component 1. Flood Management (IAs: DSI and SYGM; SAs: AFAD and MGM)
 - Government authorities responsible from effective flood management
 - Directorate General (DG) of Forestry
 - DG of Combating Desertification and Erosion
 - DG of Highways
 - Governorates
 - Provincial Special Administrations
 - Metropolitan municipalities and municipalities
 - Institutions responsible for coordination in flood management
 - Water Management Coordination Board

- Basin Management Central Board
 - Basin Management Committee
 - Provincial Water Management Coordination Board
 - Mukhtars¹
 - Commercial and industrial enterprises, including suppliers, contractors, subcontractors, and their workers.
 - Universities and research institutes
 - NGOs at local or national level such as
 - Associations on natural resources/protection, ecology
 - Foundations on natural resources/protection, ecology
 - Chambers related to activities in commerce, forestry, agriculture, tourism, hunting, fishing, etc.
 - Unions, i.e., labor unions of project workers
 - Cooperatives that have activities in forestry, agriculture, tourism, hunting, fishing, etc.
 - Media
- Component 2. Drought Management (IA: DSI; SAs: SYGM and TRGM)
 - Government authorities responsible from drought management
 - DG of Forestry
 - DG of Agricultural Research and Policies
 - Metropolitan municipalities and municipalities
 - Provincial Directorates of Agriculture and Forestry
 - Institutions responsible for management of drought
 - Water Management Coordination Board
 - Basin Management Central Board
 - Agricultural Drought Management Coordination Board
 - Disaster and Emergency Board
 - Basin Management Committee
 - Provincial Water Management Coordination Board
 - Agricultural Drought Provincial Crisis Center
 - Provincial Directorates of Disaster and Emergency
 - Mukhtars
 - Commercial and industrial enterprises, including suppliers, contractors, subcontractors, and their workers.
 - Universities and research institutes
 - NGOs at local or national level such as
 - Associations on natural resources/protection, ecology
 - Foundations on natural resources/protection, ecology
 - Chambers related to activities in commerce, agriculture, etc.
 - Unions, i.e., labor unions of project workers
 - Cooperatives that have activities in agriculture, etc.
 - Media
- Component 3. Capacity Development and Institutional Strengthening (IAs: DSI and SYGM; SAs: AFAD and MGM)
 - Universities and research institutes
 - Media

¹ A person elected by the inhabitants of a village or neighborhood to carry out the affairs of the village or neighborhood as specified by law

3.4. Disadvantaged/Vulnerable Individuals or Groups

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following:

- **Persons with disabilities:** This group is identified as a disadvantaged/vulnerable group due to possible limitations they may encounter in stakeholder consultation processes. Especially, the fact that they are not able to express their specific concerns during the preparation of the flood management plans may cause these plans to be prepared without considering their concerns and even may leave them to be in a difficult situation in some possible emergency situations.
- **Women with low socio-economic status:** Some of the activities will require public participation meetings in the villages. Most of these settlements have rural characteristics and occasionally, the stakeholder meetings are usually held in kahvehanes² where—although differs from village to village—usually the women living in the villages do not go. Therefore, women living in these villages may have limitations participating in the consultation processes. Women with low socio-economic status living in the urban areas might also face the same obstacles.
- **Migrant workers:** Migrant workers may have language barriers. Different languages will be taken into consideration to increase the efficiency of the engagement activities and ensure their involvement.

Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the Project is provided in the following sections.

² Kahvehane is the name given to the place where the men living in the village go to socialize, discuss and chat, where coffee and tea as well as various soft drinks are served, board games are played.

4. Stakeholder Engagement Program

4.1. Summary of Stakeholder Engagements Done During Project Preparation

The public consultation meetings conducted during project preparation are summarized in Table 1.

Table 1. Summary of Stakeholder Engagements Done During Project Preparation

Date	Venue	Number of Participants	Key Issues Discussed
January 5, 2024	Artvin, Arhavi	23	<p>Most of the participants were the mukhtars of the nearby villages. Key issues raised by the participants were:</p> <ul style="list-style-type: none"> • The coverage area of the subprojects should be expanded to include other villages which are also under flood risk. • All necessary permits for passage should be obtained from the parcel owners before the start of the works, since conflicts may arise during the works and some citizens may suffer. • As the projects may cause major damage to animal passage and trout, the damage needs to be compensated by various measures, including the introduction of trout in the stream by DSİ. • Construction of flood control structures using stone instead of concrete. • 150-200 years old footpaths become unusable due to the works carried out for flood control structures. • The fact that agricultural lands were flooded due to the collapse of the flood wall built during the river rehabilitation work carried out 10 years ago and flood walls should also be checked and reinforced within the scope of this subproject. • Since construction machinery damages the road, the contractors' contracts should include provisions for the elimination of the damage. • Inclusion of the provisions in the contracts with construction contractors to guarantee the damages that may occur during construction activities to be repaired. <p>DSİ stated that:</p> <ul style="list-style-type: none"> • Subprojects are prioritized according to the magnitude of the loss of life and assets that a possible flood may cause. • Although no land acquisition is needed within the scope of this subproject, DSİ stated that KGM had built a road by filling the stream bed in the part above the Kabisre stream, and within the scope of this subproject, DSİ would restore the stream to its former state, but in this case, KGM would have to make expropriation as it would have to shift the road. • In the previous projects, they constructed exit-entry points to streams, fish passages and bridges in the projects. In addition, they carry out the projects in two stages in order not to drive people away from the streams. And, they will apply these measures in this Project when possible. • The lifetime of flood control structures is 15 years, if the structures collapse before 15 years, this is an engineering error. There are no reinforcing works within the scope of this subproject.
January 5, 2024	Artvin, Hopa	44	<p>Most of the participants were the mukhtars of the nearby villages. The main issues raised by the participants are as follows:</p> <ul style="list-style-type: none"> • Near Hopa Yoldere village, there are only 3 entry/exit points into the creek along the 4 km route. In the 2 accidents that happened last year, the ambulance could not find a place to enter the stream. In addition, sometimes children's play balls fall into the stream, and they cannot take

			<p>it back. For these reasons, entry-exit points to the creek should be built in the project to be constructed.</p> <ul style="list-style-type: none"> • The bottom of the Brit is empty, and this situation poses a danger. • The unfinished parts of the previous works should be completed rather than the new project. In the previous project, no work was carried out for the historical bridge because the wall was to be built. This bridge is under danger. • The mukhtars submit a petition to the Regional Directorate of DSI about what needs to be done for the village, but they do not receive any feedback from the Regional Directorate. There is no information about the order of the villages that the works will be carried out. • The municipalities do not pay attention to stream dynamics in their Projects. Although complaints are made to the regional directorate on this issue, no feedback is provided. • Due to the road works carried out by KGM along the Sundura stream, there is a difference in elevation with the existing bridges, which causes some bridges to lose their function. • DSI needs to analyze better where to build bridges. As bridges are built where there is no road, bridges are not built where there are many crossings. • Entry/exit to the stream is very important. When animals fall, their owners cannot go down to the stream and bring the animal back up or those who want to fish cannot go down to the stream.
January 8, 2024	Corum, Sungurlu	30	<p>Key issues raised by the participants were:</p> <ul style="list-style-type: none"> • Water can be stored for use as a pool in summer and a pedestrian road can be built along the canal. • Stream crossing points in the subproject are very few. • Since the population of the district has increased due to the investments carried out in the district, it will be better for the community to complete the works sooner. • The water flow in the canal should be provided in such a way that reed, mosquitoes and swamps do not form. <p>DSI stated that:</p> <ul style="list-style-type: none"> • Water will not be stored within the subproject. • Stream crossing points in the projects can be revised according to the needs of the city. • Railings and landscape will be made in accordance with city aesthetics • If there is a request from the public and there is no need for expropriation, a walking path can be built next to the canal. • Most of the institutions do not know where the underground facilities are. There is no digital map. This constitutes a risk for the interruption of public services. For the infrastructure whose location is known, DSI, by making a protocol with the municipalities, ensures that the underground and aboveground facilities located in the stream bed are displaced before the flood control works begin. • Sometimes there may be confrontation with the public, for example, citizens may not want the bridge they use constantly to be demolished, even temporarily. • DSI will work in a programmed manner so that the public will not be affected too much by the works, for example a bridge will be demolished and built, after the demolition and construction of the other bridge is completed.

			<ul style="list-style-type: none">• Since the stream is a seasonal stream, there is no continuous flow in the riverbed, therefore, reeds may form when the stream flow decreases. Therefore, the bottom of the channel will be cleaned from time to time.
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4.2. Summary of Project Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement

The Stakeholder Engagement Plan in Table 2 outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

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Table 2. Stakeholder Engagement Plan of the Project

Project Stage	Target Stakeholders ³	Topic of Consultation/Message	Method Used	Responsibilities	Frequency/Timeline
Preparation	<ul style="list-style-type: none"> Government authorities responsible for effective drought and flood management Coordinating institutes responsible for drought and flood management Universities and research institutes NGOs at local or national level Practitioners of the guidelines, manuals, standard operational procedures that will be prepared.	<ul style="list-style-type: none"> Scope of the Project. Anticipated E&S risks and impacts of the Project. Proposed mitigation measures.	<ul style="list-style-type: none"> Formal meetings Correspondence by e-mail	DSI	Before the appraisal of the Project
Implementation	<ul style="list-style-type: none"> Government authorities responsible for effective drought and flood management Coordinating institutes responsible for drought and flood management Universities and research institutes NGOs at local or national level 	<ul style="list-style-type: none"> Progress of the Project. Main challenges encountered. Subprojects to be carried out next year.	Formal meetings	DSI	Annually
	Media	Outputs of the Project.	<ul style="list-style-type: none"> Press release Website	DSI	Mid-term of the Project
	<ul style="list-style-type: none"> Farmers Irrigation associations Village cooperatives/associations Mukhtars NGOs at local or national level Practitioners of the guidelines, manuals, standard operational procedures that will be prepared.	Scope of the subproject.	<ul style="list-style-type: none"> Focus group meetings. One-on-one interviews 	DSI	During the design of the subprojects
	<ul style="list-style-type: none"> Communities living within the impact area of the possible drought/flood. Communities (and businesses) living within the area of impact of the rehabilitation or construction of flood control structures. Farmers Irrigation associations Village cooperatives/associations Mukhtars 	<ul style="list-style-type: none"> Anticipated E&S risks and impacts of the subproject. Proposed mitigation measures. 	Public participation meeting	DSI	After the preparation and before the finalization of E&S assessment and management documents of the subprojects

³ Stakeholders of different components are merged to simplify the table.

Project Stage	Target Stakeholders ³	Topic of Consultation/Message	Method Used	Responsibilities	Frequency/Timeline
	NGOs at local or national level				
	<ul style="list-style-type: none"> Owners and formal or informal users of the lands that will be expropriated. People whose livelihoods will be affected by the rehabilitation or construction of flood control infrastructures (i.e., fishermen).	<ul style="list-style-type: none"> Scope of the RPs, EPSAs or livelihood restoration plans Entitlements	<ul style="list-style-type: none"> Focus group meetings. One-on-one interviews 	DSI in coordination with Municipalities/ Governorships	During the preparation of RPs, EPSAs or livelihood restoration plans
	Communities (and businesses) living within the area of impact of the rehabilitation or construction of flood control structures.	Subject of the management plan	<ul style="list-style-type: none"> Focus group meetings. One-on-one interviews 	Contractor	During the preparation of contractor's management plans
	Communities (and businesses) living within the area of impact of the rehabilitation or construction of flood control structures.	Information about the subproject activities and the GM of the Project	<ul style="list-style-type: none"> Brochures, bulletins, and newsletters Grievance mechanism 	Contractor	During the implementation of the subprojects
	<ul style="list-style-type: none"> Mukhtars Complainant(s)	Subject of the grievance.	<ul style="list-style-type: none"> Targeted briefings One-on-one interviews 	<ul style="list-style-type: none"> Contractor DSI 	Upon grievances
Closure	<ul style="list-style-type: none"> Government authorities responsible for effective drought and flood management Coordinating institutes responsible for drought and flood management Universities and research institutes NGOs at local or national level Practitioners of the guidelines, manuals, standard operational procedures that will be prepared.	<ul style="list-style-type: none"> Outputs of the Project. Lessons learned. 	Formal meeting	DSI	After completion of the Project activities
	Media	Outputs of the Project.	<ul style="list-style-type: none"> Press release Website 		

Information will be disclosed as follows: E&S assessment and management documents of the Project and the subprojects will be disclosed on the website of the Project; the information about the grievance mechanism will be provided both on the website of the Project and in the brochures, bulletins, and newsletters that will be distributed by the contractor, or on the notices posted near the construction site or kahvehanes or at the office of the mukhtars; regular updates on project developments will be published on the website of the Project. Unless the focus community of the information does not speak or read in Turkish, all the information will be disclosed in Turkish. In this case, the language in which the documents will be prepared will depend on the language that the focus community can understand.

4.3. Proposed Strategies to Incorporate the Views of Vulnerable Groups

The project will seek the views of vulnerable or disadvantaged groups identified in Section 4.3, through the following methods:

- Engagements to be carried out with local organizations and NGOs representing the rights of persons with disabilities, and women living in forest villages,
- Separate consultations to be conducted for women, persons with disabilities and other disadvantaged/vulnerable groups or individuals who may be identified during the project. The separate consultations conducted for women will be carried out by a woman moderator.

The following measures will be taken in order to remove obstacles to full and enabling participation / access to information:

- Information provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals (e.g., visually impaired alphabet, sign language),
- Consultations conducted at locations that provide access to disadvantaged/vulnerable groups or individuals; and
- Any written or printed materials related to the project prepared in easy to understand (non-technical) language and distributed as culturally appropriate.
- Project documents, brochures and announcements will be made available in Turkish; however, for migrant workers (including seasonal agricultural workers) and those who do not speak Turkish, the use of different languages shall also be taken into consideration to increase the effectivity of engagement activities and to ensure their participation.

5. Resources and Responsibilities for Implementing Stakeholder Engagement

5.1. Implementation Arrangements and Resources

The social specialist of the DSI-PIU will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities are municipalities/governorships, DSI Regional Directorates and contractors. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director.

The project's stakeholder engagement implementation arrangements are as follows:

- E&S focal points at the regional directorates of DSI will carry out stakeholder engagements at community level.
- Resettlement focal points at the municipalities/governorships will support DSI-PIU in carrying out stakeholder engagements related to resettlement issues.

The stakeholder engagement activities carried out by DSI will be documented and kept in the archives of DSI and summary of the engagements—organized according to Annex 1—will be sent to the World Bank quarterly as a section in the E&S monitoring reports.

The stakeholder engagements carried out by construction contractors will be summarized in their monthly implementation reports. These summaries will be consolidated by DSI-PIU and added in the quarterly E&S monitoring reports.

Capacity Support Trainings

Prior to the start of the activities of the subprojects, as also outlined in the ESMF, social specialist of the DSI-PIU will provide training for the E&S focal points and resettlement focal points to ensure proper preparation and implementation of SEP. The training will cover the principles stated in this SEP such as stakeholder identification, mapping, citizen engagement, GM, etc. Refresher training will be also given if needed during the implementation.

Estimated Budget

The budget estimate for the preparing and implementing SEP is US\$807,000. The budget breakdown can be found in Annex-2. See the sample budget line items listed in Annex-2.

6. Grievance Mechanism

A Grievance Mechanism (GM) is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of PAPs related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

6.1. Description of Grievance Mechanism (GM)

Within the Project, stakeholders or citizens can convey their grievances through national level GMs (Presidency's Communication Center [CİMER], Foreigners Communication Center [YİMER]) or Project GM.

Presidency's Communication Center (CİMER)

CİMER is a communication platform established to facilitate the use of rights granted by Law on the Right to Information Law No. 4982 and Law on the Right to Petition Law No. 3071. Applications are sent to the relevant public institution from the approximately 60 thousand administrative units registered in the system, and processed and responded to by the receiving institution. Although applications can also be made to the institutions through the communication channels on their websites, CİMER aims to respond to applications as soon as possible, to warn the units in case of delay, to carry out all these transactions within an automation system, to receive statistical reports and to monitor the entire process from the center. Applications to CİMER can be made by the Internet (www.cimer.gov.tr or www.turkiye.gov.tr), hot line (ALO 150), fax (+90 312 473 6494), letter (T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe/ANKARA) or personally through community relations desks at governorates, ministries and district governorates.

CİMER allows anonymous submissions only if the request to be submitted is under the category of a whistleblower complaint. The requests submitted to CİMER are resolved within 30 days. If the applicants do not receive feedback within this time period, they can re-submit their grievance to CİMER or elevate it to the Ombudsman Institution (www.ombudsman.gov.tr). CİMER only allows applications in Turkish.

Foreigners Communication Center (YİMER)

YİMER has been providing a centralized complaint system for foreigners. YİMER 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. Applications to YİMER can be made by the Internet (www.yimer.gov.tr), hotline (ALO 157), fax (+90 0312 920 0609), letter (Republic of Türkiye Directorate General of Migration Management, Çamlıca Mah. 122. Sok. No: 4 Yenimahalle/ANKARA) or personally at Republic of Türkiye Directorate General of Migration Management.

Project GM

In accordance with the requirements of ESS10, a Grievance Mechanism (GM) will be established by the DSI-PIU in order to receive, resolve and follow the Project specific concerns and complaints of the stakeholders. The GM will be accessible for stakeholders and citizens and will respond to all feedback (including grievances, complaints, requests, opinions, suggestions) at the earliest convenience, and DSI-PIU will ensure that all grievances are effectively received, recorded, and responded within a predetermined timeline (please see table 3) and on the basis of their contents, and that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to the grievances

would be satisfactory for both parties and activities would be followed, and the complainant would be informed about the outcomes of the corrective activities.

DSI will uptake grievances at three tiers: (i) Branch Directorate, (ii) Regional Directorate, and (iii) General Directorate. The personnel receiving grievances at DSI will be informed and trained about Project GM. For this reason, DSI-PIU will send posters, brochures, etc. to Branch/Regional Directorates of DSI to assist them in directing the stakeholders to the GM. When necessary, a Complaint Committee will be composed to address the grievances. The members of this committee will be Project coordinator and grievance related specialists of the DSI-PIU and/or the department.

The personnel at the Branch Directorates, Regional Directorates, and the General Directorates will be also informed to register any grievances related to the Project and conveyed through CİMER or YİMER to the GM of the Project.

The grievance mechanism and its uptake channels will be disclosed by posters at worksites, office of the mukhtars that are near to worksites or acquired lands, public notice boards of the municipalities, governorships, regional and branch directorates of DSI.

GM will consider the different needs and concerns of all stakeholders including any vulnerable groups that may be affected by the project. It will be ensured that the GM to be established for the Project will have necessary and applicable channels to receive SEA/SH grievances through a survivor centric approach.

The GM will also enable submission of anonymous grievances. However, the complainant will be informed that lack of name-surname/contact details may lead to delays or problems during the assessment and resolution of the grievance. The complainant will also be informed that the personal information (including name-surname, contact details) will not be shared by the third parties or disclosed. The information received from the complainant will only be used for assessment and resolution of the feedback/complaint received.

Some groups (elder or illiterate people, persons with disabilities, women living in the rural areas etc.) may experience difficulties to access the GM or may not access. Therefore, the following measures will be taken:

- The possibility to file an anonymous complaint will be open,
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In addition, contractors will establish their GM to uptake any subproject related grievances and will ensure that their subcontractors are aware and direct any grievances they uptake.

All grievances whether received from CİMER, YİMER, Project GM of the DSI or the Project GM of the contractor will be logged in the same database.

Table 3. GM Steps⁴

Step	Description of Process	Time Frame	Responsibility
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • E-mail • Letter • Telephone 		Social specialist of the DSI-PIU E&S Focal Points.

⁴ The construction contractor will adopt and implement this table in contractor's SEP. the contractor's SEP will include provisions regarding the responsibilities of the subcontractor.

Step	Description of Process	Time Frame	Responsibility
	<ul style="list-style-type: none"> Complaint form to be lodged via any of the above channels Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box 		Social specialist of the Construction Contractor
Sorting, processing	<p>Any complaint received is forwarded to Social specialist of the DSI-PIU / E&S Focal Points / Social specialist of the Construction Contractor / Resettlement Focal Point; logged in GM table; and categorized according to the following complaint types:</p> <ul style="list-style-type: none"> Improper engineering application/design Disposal of hazardous waste Disposal of non-hazardous waste Dust/Mud Impacts on the habitat Noise Random spoil piles Illegal acquisition of land Impacts on the livelihood Community health and safety Damage to personal assets Disruption of public services Esthetics Inappropriate behavior of workers Occupational health and safety Working hours Other miscellaneous grievances 	Upon receipt of complaint	<p>Social specialist of the DSI-PIU</p> <p>Social specialist of the Construction Contractor</p>
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the channel preferred by the complainant	Within 7 days of receipt	<p>Social specialist of the DSI-PIU</p> <p>Social specialist of the Construction Contractor</p>
Verification, investigation, action	Investigation of the complaint is led by the social specialist. A proposed resolution is formulated by Complaint Committee and communicated to the complainant by the channel preferred by the complainant. A grievance close-out form will be filled.	Within 10 working days	Complaint Committee composed of Project coordinator and grievance related specialists of the DSI-PIU and/or the department.
Monitoring and evaluation	Data on complaints are collected in Project GM and reported to the World Bank every six months together with the E&S monitoring reports.		Social specialist of the DSI-PIU
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected with small surveys asking their satisfaction level and is logged in the Project GM. The details of this survey will be specified in the Project Operations Manual (POM).	Concurrently with the signing of the grievance close-out form by the complainant.	<p>Complaints related to construction works: Social specialist of the Construction Contractor</p> <p>Complaints related to Project design: Social specialist of the DSI-PIU</p>
Training	The project workers will be trained on the Project GM so that they can direct the complainants, or they can convey the grievances to the social experts to be logged in the Project GM.	Project workers of contractors and subcontractors: as part of initial job training	Project workers of contractors and subcontractors will be trained by the social expert of the contractor. Training will be monitored by the social specialist of the DSI-PIU.

Step	Description of Process	Time Frame	Responsibility
		Officials of the IAs: Prior to the implementation of the Project.	Officials of the IAs will be trained by the Social specialist of the DSI-PIU. When necessary, specific trainings on how to handle SEA/SH complaints will be delivered to E&S focal points and social specialist of the PIU by a consultant.
If relevant, payment of reparations following complaint resolution	Contractors will investigate and make the reparations.	Variable according to the type of damage.	Social specialist of the Construction Contractor will monitor.

Since DSI has a three-tier GM, if the complainant is not satisfied with the proposed resolution of the complaint, he or she can escalate the grievance to upper tier. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

DSI's GM will also adopt and improve itself to handle labor complaints and suggestions (including inquiries for information or whistle-blower complaints). In addition, for each subproject, the Contractors will be required to establish, maintain, and monitor Labor GMs for contracted workers. The Labor GM is described in detail in the Labor Management Procedures of the Project.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

6.2. Gender Based Violence Grievances

For Gender Based Violence (GBV)—and particularly Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)—complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Some survivors will choose to seek services directly and never report to the GM. To enable women to safely access the GM, multiple channels through which complaints can be registered in a safe and confidential manner will be enabled.⁵

Since the SEA/SH risk of the Project is assessed Moderate, Project GM will be adapted to receive SEA/SH allegations/complaints. A standalone SEA/SH Action Plan will be prepared for the Project and will include more detailed procedures on SEA/SH grievance management and a training program for staff at different levels. The protocols and procedures should be based on the following principles:

- All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.
- Criminal cases will be referred to the public prosecutor.

Handling grievances that are sensitive will be treated in full confidentiality. National referral system will be followed by the social specialist. Türkiye has already a national referral system for sexual exploitation and abuse and sexual harassment, not only domestic violence but also workplace related harassment, bullying, and violence under the overall management of Ministry of Family and Social

⁵ World Bank. 2022. Good Practice Notes: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works

Services and already detailed in both the national Labor Law and the Penal Code, where unacceptable behaviors are explained, and relevant penalties are detailed. Psycho-social support is provided and available for survivors. The social specialist will also use ALO 170 (hotline service established for the Ministry of Family and Social Services) and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues. The social specialist will ensure that affected stakeholders are aware of the grievance mechanism, to possibility to raise such serious and sensitive grievances, and the principle of confidentiality.

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7. Monitoring and Reporting

7.1. Summary of How SEP Implementation will be Monitored and Reported upon

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular
 - (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, if needed;
 - (b) issues that have been raised and can be addressed during project implementation;
 - (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and
 - (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex 3.

7.2. Reporting Back to Stakeholder Groups

The SEP will be revised and updated as necessary during project implementation.

Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by social specialist of the DSI-PIU and referred to the Project coordinator.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders through Project updates posted on website of the Project.

Annex-1. Records of Meetings or Consultations

Stakeholder* (Group Individual)	Dates or Consultations	Summary of Feedback	Response of Implementation Team	Project Team	Follow-up Action(s)/Next Steps	Timetable/ Complete Action(s)	Date to Follow-up

* Disaggregate by gender when possible.

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Annex-2. Example of a SEP Budget Table

Budget Category	Quantity	Unit Costs	Times/ Years	Total Costs	Remarks
1. Estimated staff salaries* and related expenses					
1a. Social specialist	1	\$3,000	12*7	\$252,000	
1b. Travel costs for staff				\$25,000	
2. Events					
2a. Organization of focus groups				\$100,000	
3. Communication campaigns					
3a. Posters, flyers				\$100,000	
4. Trainings					
4a. Training on social/environmental issues for DSI-PIU and contractor staff				\$100,000	
4b. Training on gender-based violence (GBV) for DSI-PIU and contractor staff				\$10,000	
5. Beneficiary surveys					
5a. Mid-project perception survey				\$100,000	
5b. End-of-project perception survey				\$100,000	
6. Grievance Mechanism					
6a. Training of GM committees				\$10,000	
6c. GM communication materials and suggestion boxes in villages				\$10,000	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET				\$807,000	

Note: *Salary costs can be indicative.

Annex-3. Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific questions	Evaluation	Potential Indicators	Data Collection Methods
<p>GRM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are project affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 		<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	Records from the implementing agency and other relevant agencies
<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 		<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>Implementation effectiveness.</p> <p>Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>