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MINISTRY OF INDUSTRY AND
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General Directorate of Industrial
Zones

TÜRKİYE: SMALL INDUSTRIAL
ESTATES RECONSTRUCTION
AND REGIONAL ECONOMIC
RECOVERY PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

(DRAFT)

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ESTATES RECONSTRUCTION AND
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PROJECT
STAKEHOLDER ENGAGEMENT PLAN
(DRAFT)**

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1 Introduction/Project Description

On February 6, 2023, two earthquakes of magnitude 7.8 and 7.5 hit southeast Türkiye. The epicenters of the two earthquakes were in Kahramanmaraş Province, with the neighboring provinces of Adana, Adıyaman, Diyarbakır, Elazığ, Gaziantep, Hatay, Kilis, Malatya, Osmaniye, and Şanlıurfa (the earthquake region) all suffering significant damages.

The earthquakes have caused major damages to the industrial sector. On the other hand, Micro, Small and Medium Enterprises (MSMEs) in Türkiye account for 99 percent of total registered businesses and make an important contribution to the Turkish economy. According to KOSGEB's SME data, about 15 percent of MSMEs in Türkiye are located in the 11 earthquake-affected provinces (473,354 MSMEs), including 35,674 manufacturing MSMEs which employ 133,024 workers.

MSMEs, and micro and small firms especially, traditionally suffer from limited access to external finance. The earthquake makes this situation much worse for those MSMEs located in the affected provinces. To support the repair process, the Government of Türkiye has designed a project to build new Türkiye: Small Industrial Estates (SIEs) on designated public land.

Türkiye: SIEs Reconstruction and Regional Economic Recovery Project aims to create industrial districts for local small and medium enterprises/businesses that were damaged in Elazığ, Hatay, Kahramanmaraş and Malatya provinces due to the 7.7 and 7.6 magnitude earthquakes in Turkey on 6 February 2023.

The Project comprises the following components:

Component 1. Disaster Resilient SIE Investments: This component will finance the construction of seven new SIEs, including about 2,555 workshops which will then be sold to eligible MSMEs as well as common infrastructure in the SIEs, including shared buildings, outer spaces, electricity and water lines, small access roads and other necessary facilities.

The location list is presented below:

- Elazığ Çamyatağı Industrial Area
- Hatay İskenderun Bitişik Industrial Area
- Kahramanmaraş Urumoğlu Industrial Area
- Kahramanmaraş Halkaçayırı Industrial Area
- Kahramanmaraş Alibeyuşağı Industrial Area
- Malatya Battalgazi Industrial Area
- Malatya Yeşilyurt Industrial Area

Component 2. Technical Assistance and Project Management: This component will provide technical assistance and capacity building to MoIT's DGIZ and finance the Project Implementation Unit (PIU) to manage the implementation of project activities.

2 Objective/Description of SEP

The Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

Stakeholder engagement is an inclusive and dynamic process that will be carried out throughout the project's life. When properly designed and implemented, it supports the establishment of robust, constructive, and sensitive working relationships that are important for successfully managing the project's potential environmental and social impacts and risks.

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 purpose of the Stakeholder Engagement Plan is to:

- Build and maintain a constructive relationship with all stakeholders, especially affected communities,
- Assess the level of stakeholder interest and support for the project and ensure that stakeholders' views are taken into account in project design and environmental and social performance,
- Promote and provide means for effective and inclusive engagement with all stakeholders and affected parties throughout the project life cycle
- Ensure that meaningful project information on environmental and social risks and impacts is disclosed to all stakeholders in a timely, understandable, accessible and appropriate manner and format.
- Ensure that project-affected communities have inclusive and accessible means to raise issues and grievances.

3 Stakeholder Identification and Analysis

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, according to ESS10, the process of stakeholder engagement starts with stakeholder identification and analysis.

A stakeholder is defined as any individual, organization or group who is potentially affected by the Project or who has an interest in the Project and its impacts. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - ("affected parties") or have an interest in the Project ("other interested parties").

3.1 Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet or phone-based communication.

3.2 Affected parties and other interested parties

Project Affected Parties 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 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.

Specifically, the following individuals and groups fall within this category:

Table 3-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/interest	Affected Party	Interested Party
Project Owner				
• Contractors and Employees.	Direct/Positive Impact	Project Development, Implementation and Employment	√	√
Government / Authorities				
<ul style="list-style-type: none"> • Governorships of Elazığ, İskenderun, Kahramanmaraş, Malatya • Elazığ, İskenderun, Kahramanmaraş, Malatya City Health Authorities, • Elazığ, İskenderun, Kahramanmaraş, Malatya Provincial Directorates of Environment, Urbanization and Climate Change, • Elazığ, İskenderun, Kahramanmaraş, Malatya Directorates of Culture and Tourism, • Ministry of Agriculture and Forestry 	Indirect/Positive Impact	Relation of the project with Healthcare, Environmental and Social institutions during construction and operational phases		√
Municipalities				
<ul style="list-style-type: none"> • Elazığ Municipality • İskenderun Municipality • Kahramanmaraş Municipality • Battalgazi Municipality 	Direct/Positive Impact	Project Development, Implementation and Employment	√	√

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/Interest	Affected Party	Interested Party
• Yeşilyurt Municipality				
Neighbourhood/Village				
<ul style="list-style-type: none"> • Elazığ Çamyatağı (Nuralı) Village • Hatay İskenderun Bitişik Neighborhood • Kahramanmaraş-Urumoğlu (Sivricehüyük) Neighborhood • Kahramanmaraş Halkaçayırı Neighborhood • Kahramanmaraş Alibeyuşağı Neighborhood • Kahramanmaraş Karapelit Village • Kahramanmaraş Çırtıman Neighborhood • Kahramanmaraş Sapanözü Neighborhood • Kahramanmaraş Yolbaşı Neighborhood • Kahramanmaraş Asanlı Neighborhood • Kahramanmaraş Abbaslar Neighborhood • Malatya Denizli Neighborhood • Malatya Çınarlı Neighborhood • Malatya Taşlıca Neighborhood • Malatya Çakmak Neighborhood • Malatya Keçikuyusu Neighborhood • Malatya Türkyurdu Neighborhood • Malatya Sekili Neighborhood • Malatya Direkli Neighborhood • Malatya Nahırtepe Neighborhood • Malatya Yalnızbağ Neighborhood • Malatya Hacı Neighborhood • Malatya Körkün Neighborhood • Malatya Nogaylar Neighborhood • Malatya Naimler Neighborhood 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/interest	Affected Party	Interested Party
<ul style="list-style-type: none"> • Malatya Dağdancık Neighborhood • Malatya Mehmet Gökçek Neighborhood • Malatya Yeniköy Neighborhood • Malatya Nuralı Village 				
Businesses				
<ul style="list-style-type: none"> • Businesses within the project Area 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
PAPs				
<ul style="list-style-type: none"> • Persons who may be affected by all components of the Project. 	Direct or Indirect/Negative Impact	Potential noise and dust emissions, traffic,	√	
MSMEs				
<ul style="list-style-type: none"> • Micro, Small, and Medium Enterprises 	Direct or Indirect/Negative-Positive Impact	Potential noise and dust emissions, traffic, economic damage, opportunity to develop investments	√	
NGO				
<ul style="list-style-type: none"> • NGOs with themes such as environmental protection, public health, and citizenship 	Indirect Impact	The pollution load of the discharged river will be reduced.		√
Vulnerable/Disadvantaged Individuals or Groups				
<ul style="list-style-type: none"> • Children; • People who are over 65 years of age; • People who have chronic disorder or need special care; • Disabled people; • People who do not have health insurance; • People earning below the minimum wage/receiving donations from state or foundations; • Female-headed households. • Businesses run by women, 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/interest	Affected Party	Interested Party
<ul style="list-style-type: none"> • Those affected by Land Acquisition¹ • Single Unaccompanied Temporary Parents 				
Media				
<ul style="list-style-type: none"> • International, national, and local media, digital media 	Indirect Impact	Informing the public		√

3.3 Disadvantaged/vulnerable individuals or groups

Disadvantaged or Vulnerable Groups 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.

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

- **Children:** Children may be vulnerable to project impacts in terms of their physical and cognitive health, safety, learning processes. In addition, the harm to children may be irreversible. Factors that may pose risks to children include: violence and exploitation; lack of care due to parents working full time; risks due to disruption to school and health services; difficulties in accessing personal hygiene and sanitation, especially for girls, etc. Children may be also left unattended in rural areas, which make them particularly vulnerable to traffic risks.
- **People who are over 65 years of age:** Elderly people have limited participation in decision-making, which can lead to certain concerns they may have being overlooked;
- **People who have chronic disorder or need special care:** Stakeholders with chronic conditions or health problems that require regular care will experience the negative impacts that may arise from the project more intensely.

¹ No land acquisition is expected in the Project. However, it has been added as a stakeholder for the possibility of land acquisition.

- **Disabled people:** The participation of people with mental or physical disabilities in decision-making processes may be hindered from time to time. In addition, various activities of the Project may have a greater impact on persons with disabilities;
- **People who do not have health insurance:** People who do not have health insurance are considered as vulnerable since they can not reach free or less paid treatment and medical interference. The potential negative impacts on public health may affect them more;
- **People earning below the minimum wage/receiving donations from state or foundations:** People who have low income can experience adverse impacts of the Project more than other people since they have less opportunity to solve problems on their own and might require support;
- **Female-headed households:** There are women which are responsible for covering needs of their families on their own. According to research, women heading households are forced to play multiple, conflicting roles after losing their spouses, leaving their spouses or being alone, and have to work in marginal, part-time, informal, and low-income jobs due to lack of access to high-paying jobs (BMC Women Health, 2020). These adversities make female-headed households vulnerable.
- **Single Unaccompanied Temporary Parents (SuTPs):** SuTPs are individuals temporarily parenting alone due to circumstances such as separation, divorce, or the temporary absence of a partner. Research indicates that SuTPs face considerable challenges similar to those of female-headed households. They often find themselves juggling multiple responsibilities and struggling to access stable employment opportunities, leading to reliance on marginal, part-time, informal, and low-income jobs (BMC Women's Health, 2020). These challenges compound their vulnerability and can significantly impact their ability to provide for their families. In the context of earthquake rehabilitation and renovation activities in Türkiye, it's imperative to recognize the unique needs of SuTPs and ensure that interventions are designed to support their economic resilience and social well-being. Tailored assistance, including access to training programs, financial aid, and employment opportunities, can help mitigate the adverse effects of the earthquake and promote the sustainable recovery of SuTP households.
- **Businesses run by women:** Women-led businesses often face unique challenges, including limited access to resources and capital, as well as societal biases. In the context of the project, these businesses may be disproportionately affected due to their vulnerability to economic shocks. The disruption caused by the earthquake could exacerbate existing financial struggles, hinder access to markets, and pose logistical challenges, thereby jeopardizing the sustainability and growth of these enterprises. Targeted support and resources tailored to the needs of women entrepreneurs are essential to ensure their resilience and recovery in the aftermath of the disaster.

- **Those affected by Land Acquisition:** ²Individuals and communities impacted by land acquisition face significant upheaval and uncertainty, particularly regarding their livelihoods and access to resources. In the context of the earthquake rehabilitation project, these individuals may experience displacement, loss of property, and disruptions to their economic activities. The acquisition of land for reconstruction efforts could further exacerbate their vulnerability, leading to social and economic marginalization if adequate compensation, resettlement assistance, and alternative livelihood options are not provided. Ensuring fair and transparent processes, as well as meaningful engagement with affected communities, is crucial to mitigate the adverse effects of land acquisition and promote inclusive development.

Vulnerable groups within the communities affected by the Project may be added, 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 No land acquisition is expected in the Project. However, it has been added as a stakeholder for the possibility of land acquisition.

4 Stakeholder Engagement Program

4.1 Summary of stakeholder engagement done during project preparation

A set of meetings in Antakya – Hatay (09-10 January 2024), Osmaniye (11 January 2024) and Kahramanmaraş (10 January 2024) were organized to understand the demands and needs of the producers whose workshops were damaged by the earthquake. The mentioned meetings provided inputs to determine the general framework of the idea for the SIEs Reconstruction and Regional Economic Recovery Project.



Figure 1. Meeting in Antakya - Hatay

During the project preparation phase, the needs of the local enterprises in the cities of Elazığ, Hatay, Kahramanmaraş and Malatya, which were damaged during the 6 February 2023 earthquake, were evaluated through interviews with various authorities. Following these interviews, lists of demands were prepared for Elazığ Çamyatağı Industrial Area, Hatay İskenderun Adjacent Industrial Area, Kahramanmaraş Urumoğlu, Halkaçayırı, Alibeyuşağı Industrial Areas, Malatya Battalgazi Industrial Area and Malatya Yeşilyurt Industrial Area.

During the interviews the general framework and the main objects of the proposed project has been introduced and the questions, if any, responded. The main findings of the interviews are summarized below:

1. Notes on the interviews for Elazığ Çamyatağı Industrial Area:

Between 19-23 February 2023, a site visit to Elazığ has been conducted and meetings with Elazığ 3rd Mixed Industrial Site Construction Cooperative, Elazığ Union of Chambers of Tradesmen and Craftsmen, and Elazığ Chamber of Commerce and Industry were held to obtain the needs and demands of the workshops planned to be built. The demand summary is presented below:

- a. **Elazığ 3rd Mixed Industrial Site Construction Cooperative:** Within the scope of the Component, a total of 2000 workshops of 100 m², 200 m² and 300 m² are planned to be built.

- b. **Elazığ Union of Chambers of Tradesmen and Craftsmen:** Within the scope of the Component, a total of 1425 workshops of 100 m², 200 m² and 300 m² are planned to be built.
- c. **Elazığ Chamber of Commerce and Industry:** Within the scope of the Component, a total of 187 workshops of 100 m², 200 m² and 300 m² are planned to be built.

2. Notes on the interviews for Hatay İskenderun Bitişik Industrial Area

On 22 February 2024, a site visit to Hatay has conducted. During the meeting, which was held with Yarikkaya Mixed SIE Cooperative and Mining Industry Cooperative, the needs and demands were discussed:

- a. **Yarikkaya Mixed SIE Cooperative and Mining Industry Cooperative:** Within the scope of the components, a total of 56 workshops of 200 m² and 1500 m² are planned to be built.

3. Notes on the interviews for Kahramanmaraş Urumoğlu, Halkaçayiri, Alibeyuşağı Industrial Areas

On 21 February 2024 a site visit has been conducted to Kahramanmaraş. The needs & demand and institutions are presented below:

- a. **Kahramanmaraş Chamber of Tailors and Apparel Tradesmen and Craftsmen:** Within the scope of the Component, a total of 600 workshops of 200 m², 500 m², 1000 m², 1500 m², 2000 m² and 3000 m² are planned to be built.
- b. **Kahramanmaraş Shoemakers and Bagmakers Cooperative:** Within the scope of the Component, a total of 220 workshops of 300 m², 600 m² and 900 m² are planned to be built.
- c. **Kahramanmaraş Chamber of Carpenters and Furniture makers:** Within the scope of the Component, a total of 292 workshops of 300 m², 600 m² and 900 m² are planned to be built.
- d. **Chamber of Coppersmiths, Aluminium Product Manufacturers and Foundry Tradesmen and Craftsmen:** Within the scope of the Component, a total of 400 workshops of 300 m², 600 m² and 900 m² are planned to be built.
- e. **Kahramanmaraş Chamber of Blacksmiths Tradesmen and Craftsmen:** Within the scope of the Component, a total of 310 workshops of 100 m², 200 m², 600 m² and 1000 m² are planned to be built.
- f. **Chamber of Technical Machinery Craftsmen:** Within the scope of the Component, a total of 661 workshops of 300 m² and 1000 m² are planned to be built.



Figure 2. Meeting in Kahramanmaraş

4. Notes on the interviews for Malatya Battalgazi Industrial Area

On 20 February 2024 a site visit has been conducted to Malatya. The needs & demand and institutions are presented below:

- a. **Battalgazi Tradesmen and Union of Chambers of Craftsmen:** Within the scope of the Component, a total of 661 workshops of 100 m² are planned to be built.

5. Notes on the interviews for Malatya Yeşilyurt Industrial Area

On 12-13 December 2023 a site visit has been conducted to Malatya. The needs & demand and institutions are presented below:

- a. **Chamber of Furniture Tradesmen and Craftsmen, MESKO Furniture Tradesmen and Craftsmen SS Building Cooperative and TSO Furniture Wood Lumber Committee:** Within the scope of its components, it is planned to build a total of 600 workshops in areas of 250 m², 500 m², and 1000 m².
- b. **Chamber of Wood Craftsmen:** Within the scope of its components, it is planned to build a total of 184 workshops in areas of 250 m², 500 m², 750 m² and 1000 m².
- c. **Manufacturing, Iron and Repair Room:** Within the scope of its components, it is planned to build a total of 1892 workshops in areas of 200-300 m², 300-500 m² and 500-1000 m².
- d. **Öz Malatyalılar Industrial Site Cooperative:** Within the scope of its components, it is planned to build a total of 270 workshops in areas of 1000 m², 1500 m² and 2000 m².

- e. **SS. Malatya Specialized Industrial Site Construction Cooperative:** Within the scope of its components, it is planned to build a total of 820 workshops in areas of 300 m², 400 m² and 600 m².



Figure 3. Meeting in Malatya - Yeşilyurt

4.2 Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- (i) Structured agendas³,
- (ii) Focus group meetings/discussions,
- (iii) Community consultations,
- (iv) Formal meetings,
- (v) One-on-one interviews, and
- (vi) Site visits

³ "Structured agendas" refer to a method of engagement that involves organizing meetings or sessions with stakeholders according to a predetermined and organized agenda. These agendas are carefully structured to ensure that specific topics or issues are addressed during the engagement process. The purpose of using structured agendas is to provide a clear framework for discussions, ensure that key topics are covered, and facilitate efficient and productive communication between stakeholders and project teams. This method helps to streamline the engagement process and ensures that all parties involved are focused on the same objectives and outcomes.

4.3 Stakeholder engagement plan

Table 4-1. Consultation and Information Disclosure Strategy

Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target Stakeholders	Consultation Details	Responsibilities
Pre-Construction	To learn the expectations and demands of the disabled from NGOs and to consider them in project design	Face to Face Meeting	Before project construction period	Associations / Non-Governmental Organizations	Consultations to take place before construction begins	Project Owner
Construction	Traffic safety	Stakeholder meeting, headman meeting	Two (2) days before possible traffic impact, whenever necessary during the construction	Communities, Government/Authorities	Consultation about traffic safety and measures adopted by the project	Project Owner
Construction	Ensuring safety in emergencies	Stakeholder meeting, headman meeting	Whenever necessary during the construction	Communities, Government/Authorities	Introducing emergency authorized person, contact information	Project Owner
Construction	Presentation of the measures determined for the negative impacts that may be encountered during the construction period of the project	Face to Face Meeting	Before project construction period	Project Affected Persons (PAPs)	Consultations to take place before construction begins	Project Owner
Construction	Explaining the positive impacts that MSMEs can benefit from within the scope of the project	Face to Face Meeting	Before project construction period	MSME's	Consultations to take place before construction begins	Project Owner
Construction	Traffic management plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities	Providing information about traffic management	Project Owner

Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target Stakeholders	Consultation Details	Responsibilities
Construction	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities	Providing information for emergencies	Project Owner
Operation	Listening to the needs and problems identified by the NGO's, developing joint solution strategies, taking action to improve and consulting to ensure that the project can be more effective	Face to Face Meeting	Regularly throughout the operating period.	Associations / Non-Governmental Organizations	Consultations to take place through project operation phase	Project Owner
Operation	Ensuring safety in emergencies	Stakeholder meeting, headman meeting	Whenever necessary during the operation	Communities	Introducing emergency authorized person, contact information	Project Owner
Operation	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities	Providing information for emergencies	Project Owner

Stakeholder consultation meetings to be organised within the scope of the project will be notified to stakeholders through headmen announcements, national and international written media, the websites of MoIT and relevant municipalities and information brochures. The meetings will cover ESMP and SEP documents to be prepared under the project, Grievance Mechanism (GM) procedures, project orientation, project developments and stakeholders' feedback. In addition, information sharing with disadvantaged/vulnerable groups will be provided through focus group meetings or face-to-face interviews, taking into account the special circumstances of the stakeholders. Interviews, meetings and informative announcements and brochures to be held with stakeholders for information sharing will be

made in the language requested according to the needs of the population in the region, primarily in Turkish. Below is a table of specific needs of the stakeholders mentioned.

Table 4-2. Project Stakeholder Needs

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Associations / Non-Governmental Organizations	•NGOs with themes such as environmental protection, public health, and citizenship	Associations and NGO's for industry and environment	Turkish	Written information, phone, e-mail, face to face	Be aware of project phases,
Municipality	<ul style="list-style-type: none"> • Elazığ Municipality • İskenderun Municipality • Kahramanmaraş Municipality • Battalgazi Municipality • Yeşilyurt Municipality 	Management unit	Turkish	Written information, phone, e-mail, face to face	Be aware of project phases
Elazığ Çamyatağı (Nuralı) Village Hatay İskenderun Bitişik Neighborhood Kahramanmaraş - Urumoğlu (Sivricehüyük) Neighborhood Kahramanmaraş Halkaçayırı Neighborhood Kahramanmaraş Alibeyuşağı Neighborhood Kahramanmaraş Karapelit Village Kahramanmaraş Çırtıman Neighborhood	Neighborhoods within the project impact area	Affected group	Turkish	Written information, phone, face to face	Be aware of project phases

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Kahramanmaraş Sapanözü Neighborhood					
Kahramanmaraş Yolbaşı Neighborhood					
Kahramanmaraş Asanlı Neighborhood					
Kahramanmaraş Abbaslar Neighborhood					
Malatya Denizli Neighborhood					
Malatya Çınarlı Neighborhood					
Malatya Taşlıca Neighborhood					
Malatya Çakmak Neighborhood					
Malatya Keçikuyusu Neighborhood					
Malatya Türkyurdu Neighborhood					
Malatya Sekili Neighborhood					
Malatya Direkli Neighborhood					
Malatya Nahrtepe Neighborhood					
Malatya Yalnızbağ Neighborhood					
Malatya Hacı Neighborhood					
Malatya Körkün Neighborhood					

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Malatya Nogaylar Neighborhood Malatya Naimler Neighborhood Malatya Dağdancık Neighborhood Malatya Mehmet Gökçek Neighborhood Malatya Yeniköy Neighborhood Malatya Nuralı Village					
Vulnerable/ Disadvantaged Groups	<ul style="list-style-type: none"> • Children; • People who are over 65 years of age; • People who have chronic disorders or need special care; • Disabled people; • People who do not have health insurance; • People earning below the minimum wage/receiving donations from state or foundations; • Female-headed households. • Businesses run by women, • Those affected by Land Acquisition • Single Unaccompanied Temporary Parents 	Individuals with the potential to be more affected by project work	Demanded Language	Written information, phone, face to face	Be aware of project phases, Translator, Transportation

In addition to these, Sample Consultation Form (Appendix-A) will be filled in the interviews and meetings held within the scope of the project and the questions and suggestions of the stakeholders will be recorded.

4.4 Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

SEP will be periodically reviewed and will be updated and disclosed in case of necessity. The necessary announcements will be made via website. Other communication channels can be also used when it is needed based on the content of the messages and the profile of the stakeholders.

5 Resources and Responsibilities for implementing stakeholder engagement activities

5.1 Resources

MoIT PIU will be in charge of stakeholder engagement activities. The costs associated with the implementation of SEP-related activities (meetings, dissemination materials, digital communication activities, etc.) will be covered under the budgets allocated by the MoIT.

5.2 Management functions and responsibilities

The Project will be awarded to a Contractor by the tender, which will be lodged and supervised by the MoIT in accordance with WB Procurement Regulations and Public Procurement Law. The roles and responsibilities of the responsible parties in the project organizational management are provided in Table 5-1.

Table 5-1. Project Organizational Management

Responsible Party	Terms of Reference
Ministry of Industry and Technology (MoIT) Project Implementation Unit (PIU)	<ul style="list-style-type: none"> - Implementation of SEP - Planning and implementation of SEP activities - Reporting on the implementation of SEP activities to WB - Executing the defined grievance mechanism in the SEP properly and informing WB about the overall implementation status - Providing training to the contractor before the construction works on the implementation of the elements specified in the ESMP and SEP, and to the personnel, who will work during the operation period before the operation. - Establish a Grievance Mechanism in order to record and resolve the grievances related to the project.
E&S Consultant	<ul style="list-style-type: none"> - E&S Consultant's environmental and social consultants are responsible for preparing the Environmental and Social Assessment Study Reports, i.e. ESMP and SEP, for the approval of WB; - Taking part in organizing the ESMP introduction meeting to be held for the public and NGOs as part of the project; and - Finalizing the reports as per the concerns/opinions of the stakeholders.
Supervisory Consultant/ Advisor	<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 of any issues related to their engagement with stakeholders. - Informing PIU 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

6 Grievance Mechanism

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

6.1 Description of GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	<p>The grievances will be acknowledged by the GRM official assigned by Ministry of Industry and Technology (MoIT) and timeframe for the provision of response or for further consideration will mainly depend on the complexity of the issue raised, however, ideally, it is expected 2 days registration, 10 days evaluation, 15 days response.</p> <p>The GRM official who will manage the GRM will be knowledgeable about the guidelines prepared by the World Bank (WB) to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in a culture of silence due to negative reactions from the community. For the avoidance of this, it is highly important that the stakeholders raise the grievances involving these issues about the project anonymously. In addition, the authorities handling the grievances should address such issues in confidence and by a survivor centric approach.</p>	During project life time	GRM official at MoIT

Step	Description of Process	Time Frame	Responsibility
	<p>The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the project's lifespan. All stakeholders initiating a grievance will have an opportunity to claim their case in a confidential manner. The DM will ensure that the name and contact details of the complainant are not disclosed without their consent.</p>		
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> • To PIU directly: Via the complaint form: it can be downloaded from the website⁴ Via e-mail: dboneri@sanayi.gov.tr • Ministry of Industry and Technology Communication Channels: Telephone Number: 444 6 100 E-Mail: info@sanayi.gov.tr • Presidency's Communication Centre (CIMER): CIMER Website: www.cimer.gov.tr CIMER Call Centre: 150 CIMER Phone Number: +90 312 525 55 55 CIMER Fax Number: +90 0312 473 64 94 	Upon receipt of complaint	Presidency's Communication Center, and Foreigners Communication Center and related authorities

⁴ The link will be shared before the disclosure

Step	Description of Process	Time Frame	Responsibility
	<p>Address for Official Letter: Republic of Türkiye, Directorate of Communications Kızıllırmak Mah. Mevlana Bulvarı No:144 ÇANKAYA/ANKARA</p> <ul style="list-style-type: none"> Foreigners Communication Centre: The Foreigners Communication Centre (YIMER) has been providing a centralized complaint system for foreigners: YIMER Website: www.yimer.gov.tr YIMER Call Centre: 157 YIMER Phone Number: +90 312 5157 11 22 YIMER Fax Number: +90 0312 920 06 09 Address for Official Letter: Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA 		
Sorting, processing	Any complaint received is forwarded to Grievance Mechanism Officer, Logged in the system and categorized.	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by Receipt of the grievance is acknowledged to the complainant by Grievance Mechanism Officer.	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by Grievance Mechanism Officer. A proposed resolution is formulated by Project Implementation Unit and communicated to the complainant by Grievance Mechanism Officer.	Within 10 working days	GRM officer

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. 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.

Since there are special procedures/principles for handling sensitive content grievances (Sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in project areas), these grievances will be handled at the relevant institutions.

In case a sensitive complaint is received by the Contractor or MoIT, they will be responsible for conveying the issue directly to the relevant institution at national level.

Complaints of Sexual Exploitation and Abuse/Sexual harassment must be identified and reported to the relevant institutions. In complaints of Sexual Exploitation and Abuse/Sexual Harassment, confidentiality and ethical principles must be observed in order to prevent the privacy of the identities.

However, Contractor and DM should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

Worker GRM is defined as complaints from project employees (including both direct and indirect employees). This mechanism is structured with an intention of it being an effective approach for early identification, assessment, and resolution of grievances throughout the project's lifespan.

The scope of the Worker GRM can be summarized as follows, but not limited to; occupational health and safety, labour conditions, wages, problems with the local community or co-workers, hygiene problems in common areas, insufficient food and/or worker safety, etc.

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

7 Monitoring and Reporting

7.1 Summary of how SEP implementation will be monitored and reported

Ministry of Industry and Technology (MoIT) will implement the monitoring activities throughout the lifetime of the project. This Stakeholder Engagement Plan (SEP) will be updated upon receipt of feedbacks from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedbacks. In addition, SEP will be updated in case of major changes that may arise in the scope of the project. Apart from these, a summary of the implementation of the Grievance Mechanism (GM) will be published annually on the MoIT's website (<https://duzce.bel.tr/>) after removing the identity information of the persons to protect their identity.

Contractors will deliver Environmental and Social Monitoring Reports (ESMRs) to the MoIT on a monthly basis. After reviewing these ESMRs, the MoIT will submit the ESMRs on its environmental and social performances to WB as quarterly, along with a summary of the grievances and how they are resolved, including the grievance logs, together with the Grievance Register. The GRM established for the project will be used effectively and the statistical summary of the outputs of the GRM will be reported to the MoIT and lenders. Grievances will be received from the public and workers through the Sample Grievance Form (Appendix-B). The actions taken to resolve the grievances will be transferred to the Grievance Closure Form (Appendix-C) by the officer. Thus, the topics that the complaints are concentrated, the number of complaints, solutions and timing will be tracked through the database and the Grievance Register provided in Appendix-D.

Moreover, ESMRs will be submitted to WB every three (3) months together with Progress Reports. MoIT will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national/international regulations and lenders' requirements.

The key performance indicators to be used during the implementation of this SEP are set out in Table 7-1 **Error! Reference source not found.**

Table 7-1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

No	KPI	Goal	Project Phase	Monitoring Measures	Assessment Frequency	Responsible Party
1	Number and type of grievances, including the following details: Gender, province, category of grievance, status of grievances (closed, pending, resolved), etc. Number of invalid grievances	Decrease in number of grievances received Increase in grievance closeout rate (closed grievances /total number of grievances) Decrease in time of grievance closeout, Zero grievances not closed out within the target timeframe	Construction and Operation	Database	2 months	MoIT
2	Number of grievances responded in the target timeframe of one month	90% target	Construction and Operation	Database	2 months	MoIT
3	Providing feedback to stakeholders on the implementation of the GRM (the number and type of consultations, number of participants, type of stakeholders engaged etc.)	Regular reporting to stakeholders on the results of the GRM	Construction and Operation	Reporting	2 months	MoIT
4	Internal audit of the GRM to ensure that the GRM is implemented and that grievances are adequately handled	Annual audit of closing the targeted 90% of the grievances within one month to the satisfaction of the complainant	Construction and Operation	Inspection Report	2 months	MoIT
5	Number of Planned Stakeholder Engagement Activities Type of planned Stakeholder Engagement Activities Number of participant stakeholders Type of participant stakeholders (Activity records, meeting minutes, participant records and related reports, documents, etc.)	Increase in the number of activities carried out Increase in the number of participants Increase in the number of different types of stakeholder (as group or person)	Construction and Operation	Reporting	3 months	MoIT

The current GRM officials and the official to be appointed by the MoIT will review a statistical and qualitative analysis of feedback and complaints and their results every two months and will submit the reports to the Project Implementation Unit (PIU) and the MoIT.

Two months reports will contain only as much information as required regarding the grievance, and the personal data of individuals using the GRM will remain confidential and will not be shared in these reports.

According to the reporting requirements set in the ESMF, the MoIT will be responsible for submitting a quarterly report to World Bank on the progress of the project. Project specific progress reports will also include a section on stakeholder engagement activities carried out during the specified period. Stakeholder engagement activities will be presented in a tabular format listing the tasks undertaken, as well as the time of action, the responsible party, the target group, and the purpose of the action. MoIT will inform WB of any changes made in the SEP (if any).

This SEP is a living document and needs to be updated throughout the life of the project. These updates can be updated in line with a change in the project, increasing complaints, requests/demands and opinions arising in the SEPs to be held quarterly. At the same time, the grievances raised in the grievance feedback reports that the GRM officer will submit to the MoIT every two (2) months will be included in the stakeholder engagement plan. It will be an important indicator for the need for updates.

7.2 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of 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 responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

Appendices


APPENDIX - A Sample Grievance Form

APPENDIX - B Grievance Closure Form

APPENDIX - C Sample Consultation Form

APPENDIX - D Sample Grievance Register

APPENDIX-A Sample Consultation Form

 <p>Ministry of Industry and Technology</p>	<p>Ministry of Industry and Technology (MoIT)</p> <p>Türkiye: Small Industrial Estates Reconstruction and Regional Economic Recovery Project</p>			
	<p>CONSULTATION FORM</p>			
Form Completed by:		Date and Time:		
Subject of Meeting:		Ministry of Industry and Technology		
<p>1. MEETING DETAILS</p>				
Interviewed Entity:		Mode of Communication <input type="checkbox"/>		
Name-Last Name of the Interviewee:		Telephone / Toll Free Number <input type="checkbox"/>		
Telephone:		Face-to-Face Meeting <input type="checkbox"/>		
Address:		Website / E-mail <input type="checkbox"/>		
E-mail:		Other (Describe)		
<p>Type of Stakeholder</p>				
Governmental Body <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Focus Groups <input type="checkbox"/>	Union of Industries <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
<p>2. MEETING DETAILS</p>				

Project-related questions:	
Project-related concerns/feedback:	
Responses to the views provided above:	


*Recorded by
Name/Last Name:*

Signature:

*Complainant
Name/Last Name:*

Signature

APPENDIX-B Sample Grievance Form

Ministry of Industry and Technology 	Ministry of Industry and Technology <i>Türkiye: Small Industrial Estates Reconstruction and Regional Economic Recovery Project</i>			
	GRIEVANCE FORM			
Form Completed by:	Date and Time:			
Subject of Meeting:	Türkiye: Small Industrial Estates Reconstruction and Regional Economic Recovery Project			
3. PARTICULARS OF THE COMPLAINANT				
Name-Last Name:	Grievance Communicated by:			
TR ID No:	Telephone / Toll Free Number <input type="checkbox"/>			
Telephone:	Face-to-Face Meeting <input type="checkbox"/>			
Address:	Website / E-mail <input type="checkbox"/>			
E-mail:	Other (Describe) <input type="checkbox"/>			
Type of Stakeholder				
Governmental Body <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>

Focus Groups	<input type="checkbox"/> Union of Industries	<input type="checkbox"/>	Labor Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
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4. DETAILED INFORMATION ON THE GRIEVANCE

Description of the grievance:	
Solution method requested by the complainant	


Recorded by

Name-Last Name/Signature

Complainant

Name-Last Name/Signature

APPENDIX-C Grievance Closure Form

Ministry of Industry and Technology		Ministry of Industry and Technology	
		Türkiye: Small Industrial Estates Reconstruction and Regional Economic Recovery Project	
		GRIEVANCE CLOSURE FORM	
Ministry of Industry and Technology			
5. DETERMINATION OF THE CORRECTIVE ACTION			
1			
2			
3			
4			
5			
Responsible Departments			
6. GRIEVANCE CLOSURE			
<i>This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.</i>			

Grievance Closure Date:

Grievance Closer's Full Name/Signature:

Complainant's Full Name/Signature:

