



Ikitelli Integrated Health Campus Project Stakeholder Engagement Plan

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1.0 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Ikitelli Integrated Health Campus Project (IHC or Project). The Project will be developed by Istanbul PPP Sağlık Yatırım A.S. (Istanbul PPP A.S.) who will be responsible for the design, construction, equipping and maintenance of the IHC within a Project period of 29 years, under a Public Private Partnership Agreement with Ministry of Health (MoH). The IHC will involve a health campus with a total capacity of 2,682 beds consisting of eight hospitals.

The SEP is a public document, which presents plans for stakeholder engagement, consultation and disclosure, and is to be updated for each phase of the Project. The main goal of the SEP is to ensure that Project-affected people and other stakeholders are provided relevant, timely and accessible information and involved at all stages of the project, including disclosure of key information, consultation around key decisions and options, grievances and appeals, as well as project benefits so that they have an opportunity to express their views and concerns about the project and its impacts and mitigation measures. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders including the vulnerable groups,
- generate a good understanding of the Project amongst those that will be affected,
- identify issues early in the project cycle that may pose a risk to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective, and efficient),
- establish a system for long-term communication between the Project and communities that is of benefit to all parties.

This version of the SEP is related with the consultation activities of Environmental and Social Impact Assessment (ESIA) study prepared for the Project. SEP also summarizes previous consultation activities related to the Project and consultation that has been undertaken during the preparation of the ESIA Report and briefly outlines engagement activities related to the construction and operation phases of the Project. The SEP is the responsibility of Istanbul PPP A.S. and Istanbul PPP A.S. is fully committed to undertaking necessary engagement activities in a manner that is consistent with international good practice as outlined in next sections.

1.1 Project Information

The healthcare system in Turkey is being developed under the Health Transformation Program which was initiated in 2003. The purpose of this program is to increase the quality and efficiency of the healthcare system and enhance access to healthcare facilities with the introduction of a number of reforms. Within the scope of the Health Transformation Program, MoH has planned to develop 31 Health Campuses of different sizes and bed capacities in 27 provinces to serve 29 health regions among Turkey, which were determined based on the need for health services, geographical structure, patient flow, accessibility and socioeconomic conditions. Until now, bidding process has been completed for 18 health campus projects and the other health campus projects are currently at different stages of planning. Ikitelli IHC Project is one of these 18 projects and has been proposed by MoH to serve the 29th health region named as Istanbul Cekmece that covers Buyukcekmece, Kucukcekmece, Beylikduzu, Basaksehir, Silivri, Catalca, Esenyurt and Avcilar districts of Istanbul Province (with a total population of 3,025,889 (Turkish Statistical Institute - TUIK, 2015).

A bid was tendered by the Ministry of Health (MoH) for the Construction Works and the Provision of Products and Services for Ikitelli Integrated Health Campus under a Public Private Partnership (PPP) model, and awarded to a Special Purpose Vehicle (SPV) entitled “Istanbul PPP Sağlık Yatırım A.Ş.” (Istanbul PPP A.S.) (previously Istanbul Ikitelli International Healthcare Investments Incorporation (IHIC)) which comprises the shareholders Rönesans Sağlık Yatırım A.Ş. and Sojitz Corporation.

Under the terms of the agreement with MoH, Istanbul PPP A.S. will be responsible for the detailed design, construction, equipping, financing, maintenance and operation of the IHC for a 29-year project period (covering a construction period of 3 years and operation period of 26 years), while the provision of medical services will be the responsibility of MoH. At the end of the project period, IHC will be transferred to MoH.

The Project is located in the Basaksehir district of Istanbul province, Turkey. The Project location is shown in Figure 1-1.



Figure 1-1: (a) Project location within Istanbul province, (b) Project site and its boundaries (yellow line indicates the Project site boundary)

The Project will have a total capacity of 2,682 beds consisting of 2,330 bed Main Hospital, 152-bed Psychiatric Hospital and 200-bed Physical Therapy and Rehabilitation Hospital. The Main Hospital is comprised of six hospitals and six clinics in east-west direction:

- 469-bed General Hospital
- 311-bed Neurological Sciences and Orthopedic Hospital
- 327-bed Cardiovascular Hospital
- 367-bed Oncology Hospital
- 397-bed Children’s Hospital
- 459-bed Women Diseases Hospital

In addition to the hospitals, there will be four helipads, a technical service building (where boilers and trigeneration system will be located) and a facility management logistics building. The layout of the hospitals is shown in Figure 1-2.

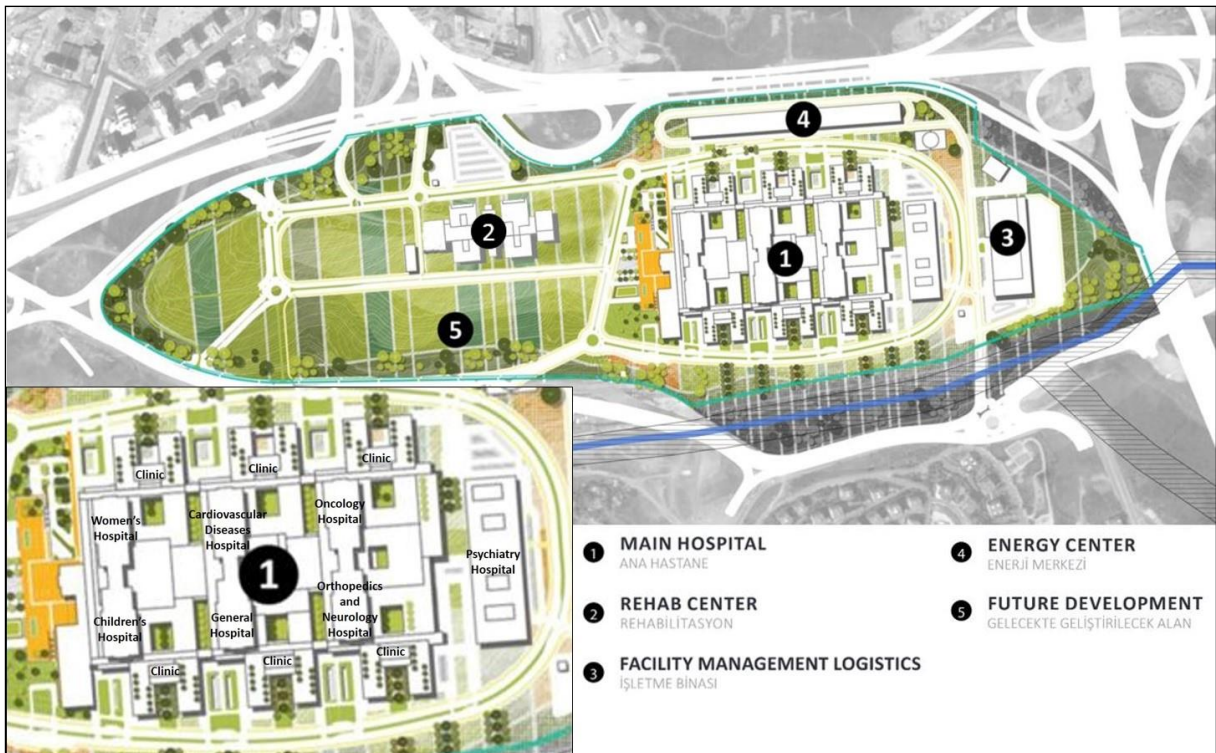


Figure 1-2: Layout of the hospitals and other units within the IHC (green line indicates the boundaries of the Project site)

1.2 Project Program

Istanbul PPP A.S. is seeking finance from multinational financial institutions (FIs) including export credit agencies to fund the Project development. One of the FIs requirements for granting loans is the preparation of an ESIA Report for identifying potential environmental and social impacts and risks of the Project and developing mitigation measures appropriate to the nature and scale of the Project. A Draft ESIA study (dated October 2014) for the Project was previously prepared for a project configuration that is different than the current Ikitelli IHC design. These Project design variations and likely associated impacts required the undertaking of the present ESIA study. The present ESIA Report

has been prepared to comply with the requirements of International Finance Corporation’s (IFC) Performance Standards (PSs) on Social and Environmental Sustainability (dated January 2012), JBIC Guidelines for Confirmation of Environmental and Social Considerations (ESCs) (dated January 2015) and NEXI Guidelines on Environmental and Social Considerations (ESCs) in Trade Insurance (dated January 2015). In addition to the IFC PSs, JBIC ESCs and NEXI ESCs; IFC Environmental, Health and Safety (EHS) General Guidelines, IFC EHS Guidelines for Healthcare Facilities and other relevant international guidelines were taken into account during the ESIA process.

The ESIA Report is accompanied by an Environmental and Social Management Plan that identifies how significant impacts will be mitigated, managed and monitored during the construction and operation phases of the Project.

The planning of the Project is still ongoing. This ESIA study is based on the construction schedule as illustrated in Table 1-1. The construction of the Project will take three years. The mobilization works has started at the Project site.

Table 1-1: Tentative Construction Schedule

Works to be undertaken	1 st year				2 nd year				3 rd year				4 th year			
	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter
Contractual Processes																
Site Delivery																
Design Processes																
Mobilization																
Earth & Infrastructural Works																
Structural Works																
Finishing Works																
Roof and Façade Works																
External Site Works (Landscaping)																
Mechanical & Electrical Works																
Automation & Furnishing																
Medical Equipment																
Testing & Commissioning																
General Cleaning and Disinfection																

2.0 NATIONAL REGULATORY REQUIREMENTS AND INTERNATIONAL PRACTICE

Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette date and number: 25.11.2014/29186) includes provisions for public consultation and disclosure of project information for projects listed in Annex-1 of the regulation. However, hospital projects do not fall within scope of the Turkish EIA Regulation. MoH has asked the view of the Ministry of the Environment and Urbanization (MoEU) in 2014 on the applicability of the EIA Regulation for the Project. Accordingly, MoEU provided an EIA exemption letter for the Project. MoH has made an application to MoEU in November 2016 for a recent view on the applicability of the EIA Regulation for the Project. MoEU responded that the previous EIA Exemption is still valid for the Project. In order to ensure that the Project meets environmental and social standards as mentioned above, an ESIA study is being conducted.

Together with the main hospital components, there will be a trigeneration plant, boilers and concrete batching plant to be used as auxiliary facilities within the scope of the Project. Based on the official letter of MoEU issued to Istanbul Provincial Directorate of Environment and Urbanization (dated 13.07.2015), the auxiliary facilities were evaluated as part of the Project components and therefore exempted from the requirements of the EIA Regulation.

In addition, there are two concrete batching plants that were installed inside the Project site. A concrete batching plant with a capacity of 90 m³/h was previously installed at the Project site which was relocated to approximately 100 m south by Oyak Beton A.S. (appointed by Istanbul PPP A.S.). This concrete plant obtained an EIA Exemption from the Istanbul PDEU (dated 27.10.2015) based on the fact that its capacity is lower than 100 m³/h threshold that would have triggered the EIA Regulation requirements (i.e. Annex 2 of the EIA Regulation). A second concrete batching plant with a capacity of 90 m³/h was also installed at the same area by Oyak Beton A.S. The EIA exemption official letter is being awaited from the Istanbul PDEU for the second concrete batching plant as reported by Oyak Beton A.S. (based on the decision of MoEU dated 13.07.2015 as explained above).

As Istanbul PPP A.S. is seeking finance from multinational financial institutions to fund the Project development, the Project needs to comply with the requirements of IFC PS 1 and JBIC/NEXI ESC 5. IFC requires from projects to have a stakeholder engagement that is free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

IFC PS1 describe stakeholder engagement as an on-going process and in summary require the following:

- (i) identification of stakeholders that are or could be affected by the project, as well as other parties that may have an interest in the project (affected people, communities, businesses and relevant governmental bodies, general public),
- (ii) ensuring that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation,
- (iii) maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

In summary, stakeholder engagement should start at an early stage of the ESIA process and continue during project implementation. A grievance mechanism needs to be established as well to facilitate resolution of stakeholder's concerns and grievances about the client's environmental and social performance. According to the IFC/NEXI/JBIC requirements and international best practices, Istanbul PPP A.S. is now offering consultation opportunities for stakeholders as described in the following sections.

3.0 STAKEHOLDER IDENTIFICATION

3.1 Introduction

For the purposes of this plan, 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 purpose of stakeholder identification is to identify and prioritize project stakeholders for consultation who may be affected (either directly or indirectly in positive or negative way) by the Project or who have an interest in the Project but are not necessarily directly impacted by the Project. It is important to note that stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

The key primary stakeholder group will be the local communities around the Project site including neighboring land users (particularly related to impacts during construction) and the general public. Other important stakeholders include authorities at national, regional and district level, and non-governmental organizations (NGOs). A number of different stakeholders (as outlined in sections 3.2 to 3.6) have been identified for the Project with responsibilities and interests relevant to the Project and its impacts. A stakeholder database has been established including the name of the representatives and contact details of each stakeholder identified. This database will be reviewed and updated as the Project proceeds.

3.2 Neighbouring Land Users

There are a great number of mass housing complexes in the vicinity of the Project site. The closest housing settlements are to the west boundary of the Project site at a distance of approximately 200 m. These houses which were built by the Housing Development Administration of Turkey (TOKI) are located in Kayasehir neighborhood. There is another housing complex (Bahcetepe Istanbul) at a distance of 150 m to the southwest of the Project boundary. The closest houses to the east of the Project site are located at a distance of approximately 210 m. These residential buildings include shanty houses, apartments and housing complexes which are located in Basaksehir district. A new mass housing project (Nida Park) construction is underway (almost completed) at approximately 250 m to the Southwest boundary of the Project site.

The Basaksehir Neighborhood is located to the east of the Project site and includes numerous residential buildings, schools (closest is Nurettin Topçu Elementary School at a distance of 600 m), industrial areas (closest is TUMSAN Industrial Area at a distance of 1,170 m), shopping malls and major multiple-unit housing projects (such as Arterium Residences and Shopping Center at a distance of 400 m to the Project site).

The Kayasehir neighborhood is located to the west of the Project site and is mainly made up of residential buildings. There is a school located at a distance of 200 m to the northwest boundary of the Project site. The TOKI Kayasehir Anadolu High School and TOKI Kayasehir Middle School are located at a distance of 780 m and 810 m, respectively from the Project site boundary. In addition, recently completed Topkapı Schools' Kayasehir Campus (including kindergarden, elementary school, secondary school) is located approximately 530 m to the Project site boundary in the same direction. There are a number of small shops and hobby gardens near the Topkapı Schools' Kayasehir Campus. A new building (reported to be used as a university campus building) belonging to Turkey Youth and Education Service

Foundation (TURGEV) is located between the Project site and the hobby gardens, and has a distance of 210 m to the west boundary of the Project site.

These are considered as important stakeholders particularly related to impacts during construction phase such as noise and air quality impacts, potential traffic increase during construction and operation phases.

3.3 Local Communities

Neighbourhoods around the Project site and at a wider distance (approximately within 10 km diameter considering the potential for traffic impacts to be felt up to this distance) were considered that include following 13 neighborhoods:

- Basak, Basaksehir, Kayabasi and Guvercintepe neighborhoods in Basaksehir District (Completely or partly within 2 km radius perimeter around the Project Site).
- Altinsehir, Ziya Gokalp and Sahintepe neighborhoods and Samlar village in Basaksehir District; Yarimburgaz, Atakent, Ataturk and Mehmet Akif neighborhoods in Kucukcekmece District and Habibler neighborhood in Sultangazi District (Completely or partly within 10 km diameter around the Project Site considering the potential for traffic impacts to be felt up to this distance).

Furthermore, districts of Basaksehir, Beylikduzu, Buyukcekmece, Kucukcekmece, Silivri, Catalca, Esenyurt and Avcilar within the 29th health region that the Project will serve and other districts of Istanbul Province will also be considered as the stakeholders of the Project under local communities that include residents and businesses that may be affected (positively or negatively) by the environmental and social changes as a result of the construction and operation of the Project.

3.4 Hospitals

As of 2015, there are 57 hospitals, 949 health centers, 3 health houses, 187 emergency response stations, 12 oral and dental health centers, 32 child and mother health and family planning centers, 4 public health centers, 28 tuberculosis combat centers and 28 blood centers in Istanbul that are affiliated with MoH. There are also 12 university hospitals, 4 Hospitals owned by Municipality or Ministry of Defense, and 163 private hospitals in Istanbul province.

According to the planning of the MoH, although there are plans for hospital closures and/or new arrangements in existing hospitals in Istanbul Province, the timing for potential closures and new arrangements (i.e. increasing or decreasing the number of beds in the existing hospitals, rebuilding or relocating the closed hospitals) are not clear at this stage. Based on previous ESIA stakeholder consultations with MoH and Istanbul Provincial Directorate of Health; the hospital planning is ongoing, planned hospital closures by MoH do not always indicate complete removal of the hospital but instead there are also plans for rebuilding and/or relocating the closed hospitals and the issue of potential hospital closures can only become more clear with additional planning. In addition, no hospital closures are expected within the health region for which Ikitelli IHC will provide service.

3.5 Governmental Organizations

Governmental organizations can be grouped as national, regional, provincial, district and neighbourhood/village levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. A list of governmental agencies relevant to the Project is prepared as given below:

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Ministry of Health (MoH), General Directorate of Health Investments	The Project has been proposed by MoH. MoH will be responsible for the provision of medical services during operation phase of the Project.
	MoH, General Directorate of Management Services	
	MoH, Public Hospitals Institution	
	MoH, General Directorate of Health Services	
	MoH, General Directorate of Emergency Health Services	
	MoH, Public Health Agency of Turkey	
	Ministry of Environment and Urban Planning (MEUP), General Directorate of EIA, Permit and Audit	MEUP has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.
	MEUP, General Directorate of Environmental Management	
	MEUP, General Directorate of Spatial Planning	
	MEUP, General Directorate of Protection of Natural Assets	These organizations may have specific views on protected sites, lakes and dams close to the Project site.
	Ministry of Forestry and Water Affairs (MoWA), General Directorate of State Hydraulics Works (DSI)	
	MoWA, General Directorate for Nature Protection and National Parks	
Ministry of Labor and Social Security (MoLSS), General Directorate of Labor	MoLSS may have specific views on labor and working conditions, and health and safety of healthcare personnel.	
MoLSS, General Directorate of Occupational Health and Safety		
MoLSS, Social Security Institution		
Regional	Istanbul 14 th Regional Directorate of State Hydraulic Works	This organization may have specific views about water courses running close to the Project area.
	Istanbul 1 st Regional Directorate of Ministry of Forestry and Water Affairs (MFWA)	This organization may have specific views on the protected areas close to the Project area and the status of the trees in the Project Area.
	Istanbul Regional Directorate of Labor and Social Security	Opinion may be provided related to the regional healthcare workforce.
	1 st Regional Directorate of General Directorate of Highways	The organization may provide opinion regarding roads and highways related to Project area.
	Istanbul 1 st Regional Board Directorate of Cultural Assets Protection	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project site.
Provincial	The Governorship of Istanbul	The governorship representing the national government is the highest authority in the province.
	Istanbul Metropolitan Municipality	The metropolitan municipality and its relevant departments will have responsibilities in relation to the Project.
	Istanbul Metropolitan Municipality, Department of Health	
	Istanbul Metropolitan Municipality, Department of Social Services	
	Istanbul Metropolitan Municipality, Department of Environmental Protection and Control, Waste Management Directorate	
	Istanbul Metropolitan Municipality, Department of Environmental Protection and Control, Environmental Control Directorate	
	Istanbul Metropolitan Municipality, Department of City Planning and Development	
	Istanbul Metropolitan Municipality, Department of Transportation, Transportation Coordination Directorate	

GOVERNMENTAL BODIES			
Level	Organization	Relation to the Project	
Provincial	Istanbul Metropolitan Municipality, Department of Rail Systems	These organizations are involved in the provision of health services and healthcare workforce in the province.	
	Istanbul Metropolitan Municipality, Department of Road Maintenance and Infrastructure Coordination Directorate		
	Istanbul Metropolitan Municipality, Department of Technical Works, Constructional Works Directorate		
	Istanbul Metropolitan Municipality, Department of Technical Works, Infrastructural Services Directorate		
	Istanbul Metropolitan Municipality, Department of Study and Projects		
	Istanbul Governorship Provincial Directorate of Health		
	Istanbul Governorship Provincial Directorate of Public Health		
	Istanbul Province General Secretariat of Public Hospitals		
	Istanbul Provincial Directorate of Social Security Institution		
	Istanbul Provincial Directorate of Environment and Urbanization (PDEUP)		PDEUP has regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting.
	1 st Regional Directorate of MFWA		This organization may provide specific opinion on the landuse and status of trees within the Project area.
	Istanbul Disaster and Emergency Management Directorate		This organization has a function to manage and respond to emergency situations.
	Istanbul Provincial Directorate of Culture and Tourism		This organization may provide an opinion related to archaeological potential of the Project site.
	District		The Governorship of Başakşehir, The Municipality of Başakşehir
The Governorship of Eyüp, The Municipality of Eyüp			
The Governorship of Arnavutköy, The Municipality of Arnavutköy			
The Governorship of Avcılar, The Municipality of Avcılar			
The Governorship of Sultangazi, The Municipality of Sultangazi			
The Governorship of Esenyurt, The Municipality of Esenyurt			
The Governorship of Küçükçekmece, The Municipality of Küçükçekmece			
The Governorship of Bağcılar, The Municipality of Bağcılar			
The Governorship of Esenler, The Municipality of Esenler			

3.6 Non-Governmental Organizations

A list of key NGOs (including women associations and public education centers) that may have an interest in environmental and social aspects of the Project is also prepared as given below:

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Turkish Medical Association	Turkish Medical Association has previously filed a lawsuit for other three hospitals that are planned to be built through a public-private partnership (PPP) model and towards the PPP model, in general.

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Trade Union of Public Employees in Health and Social Services	These associations together with the Turkish Medical Association has published a notice on negatives aspects of PPPs.
	Trade Union of Revolutionary Health Workers	
	Association of Social Service Specialists	
	Association of All Technicians of Radiology	
	Turkish Nurses Association	
	Turkey Trade Union of Health Workers	
	Trade Union of Employees of Health and Social Services	
	Trade Union of All Employees of Health and Social Services	
	White Coat Trade Union of Health and Social Services	
	Trade Union of Medical Workers	
	Trade Union of Health and Social Service Employees Rights	Trade unions are important stakeholders representing the labor rights of health sector personnel.
	Trade Union of Turkish Public Employees in Health and Social Service Branch	
	Trade Union of Anatolian Health and Social Service Employees	
	Trade Union of Active Health	
	Independent Trade Union of Public Workers in Health and Social Services	
	Trade Union of Democratic Employees of Health and Social Services	
	United Trade Union of Public Workers in Health and Social Services	
	Turkish Red Crescent	
	Pediatric Nurse Association	
	Oncologic Nurse Association	
	Urology Nurse Association	These associations are social organizations working on different aspects of healthcare sector and may provide important opinion on their areas of specialization.
	Obstetricians and Nurses Association	
	Turkish Intensive Care Nurses Association	
	Doctors' Rights Association	
	Doctors Association	
	Turkish Dental Association	
	Contemporary Pharmacists Association	
	Pharmacists and Health Sector Employees Association	
	Psychiatric Association of Turkey	
	Turkish Society of Anesthesiology and Reanimation	
	Association of Patient and Patient Relatives Rights	Requesting opinion of these associations is important to understand their expectations.
	Association of Health Employees	
The Health Foundation of Turkey		
Foundation of Hope in Health		
Health Tourism Association of Turkey		
Turkey National Pediatric Association		
Turkish Pediatric Association		
Turkish Cancer Research and Fighting Organization		
Infectious Diseases Prevention Association		
Child Health Association		
Turkish Association for Child and Adolescent Psychiatry	These organizations are representatives of their national organizations and may provide specific opinion regarding different issues within the province.	
Turkey Confederation of Disabled		
Turkey Handicapped Association		
Solidarity Association for Physically Disabled		
Turkish Medical Association İstanbul Chamber of Medical Doctors		
Turkish Red Crescent - İstanbul Office		
Trade Union of Employees of Health and Social Services - İstanbul Office		
Turkey Trade Union of Health Workers İstanbul Office		
Trade Union of Public Employees in Health and Social Services İstanbul Office		
Trade Union of Turkish Public Employees in Health and Social Service Branch - İstanbul Office Number 5 (Closest to the Project Location)		
Trade Union of Anatolian Health and Social Service Employees İstanbul Representative		
Trade Union of Active Health İstanbul Representative		

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
Provincial	Trade Union of Democratic Employees of Health and Social Services Istanbul Office	These chambers and associations may provide provincial-specific and or site-specific views related to the Project.
	Turkey National Pediatric Association Istanbul Office	
	Turkish Society of Anesthesiology and Reanimation - Marmara Branch	
	Association of Social Service Specialists Istanbul Office	
	Turkey Handicapped Association Istanbul Office	
	Turkish Nurses Association Istanbul Office	
	Turkish Association for Nurses - Istanbul Office	
	Turkish Association for Psychologists - Istanbul Office	
	The Turkish Society of Hematology – Istanbul Office	
	Turkish Psychological Counseling Association - Istanbul Office	
	Turkey Physical Medicine and Rehabilitation Association	
	Turkish Psychiatry Association - Istanbul Office	
	Istanbul Family Practitioners Association (Member to Family Practitioners Association)	
	Private Hospitals and Health Institutions Association	
	Istanbul Chamber of Pharmacists	
	Turkish Kidney Foundation	
	Istanbul Association for Fighting Tuberculosis	
	Turkey Association for Multipl Skleroz	
	Down Turkiye Down Syndrome Association	
	Turkey Association for Fighting Cancer	
	Association for Rights of Patients and Relatives	
	Pendik (Istanbul) Association for Solidarity with Physically and Mentally Disabled People	
	Association for Solidarity with Physically Disabled People	
	Friends of Schizophrenia Association	
	Six Dots Association for Blind - Istanbul Office	
	Anatolian Association of Union for Disabled - Istanbul Office	
	Federation for Disableds' Rights	
	Spastic Disabled Childeren Foundation	
	Association for Child Education	
	Şişli (Istanbul) Association for Hearing and Speech Impaired	
	Association for Hearing Impaired and Their Families	
	Chamber of Environmental Engineers Istanbul Provincial Representative Office	
	Chamber of Urban Planners	
	Chamber of Forests Engineers Istanbul Office	
	Chamber of Civil Engineers Istanbul Office	
	Chamber of Architects Istanbul Office	
	Chamber of Geophysics Engineers Istanbul Office	
	Chamber of Geology Engineers Istanbul Office	
	Turkey Association for Agriculturists - Istanbul Office	
	The Foundation for the Protection and Promotion of the Environment and Cultural Heritage	
	World Wide Fund Turkey	
	Marmara Environment Platform	
Association for Monitoring Equal Rights		
Istanbul City Council		
Public Employees Association Istanbul European Side Representative		
Istanbul Association for Solidarity of Muhtars		
Istanbul Muhtars Union Association		
District	Turkish Red Crescent – Başakşehir Office	
	Başakşehir City Council	
	Başakşehir Global Medical Doctors and Hope Health Association	
	Exporter Industry Businessmen Association	
	Breast Health Association	
	Başakşehir Social Solidarity Association	
Başak Istanbul Education Culture Solidarity Association		

WOMEN'S ASSOCIATIONS AND PUBLIC EDUCATION CENTERS		
Level	Organization	Relation to the Project
Women's Associations	International Women of Istanbul	Women tend to attend sick family members to visit a hospital and their views on the IHC are important.
	International Women's Solidarity Association	
	Women Associations Federation	
	The Women Entrepreneurs Association of Turkey	
	Turkish Women Union	
	Turkish Women Council Association – Istanbul Office	
	Turkish Women Culture Association	
	Turkish Association for Undergraduate Women – Istanbul Bakırköy	
	The Foundation for Women's Solidarity	
	Ankara Women Health Association	
	Women Health Nursing Association	
	Republican Women Association - Istanbul Avcılar Office	
	Association of Women with Disabilities	
	Women's Solidarity Foundation	
	Women's Labour and Employment Initiative	
	Foundation for the Support of Women's Work	
	Turkish Medical Association – Branch of Women Medical Doctors and Women's Health	
Turkish Mothers' Association – Bakırköy Office		
Foundation for Mother and Child Health		
Public Education Centers	Istanbul Başakşehir Public Education Center	
	Istanbul Küçükçekmece Public Education Center	
	Istanbul Eyüp Halk Public Education Center	
	Istanbul Arnavutköy Public Education Center	
	Istanbul Avcılar Public Education Center	
	Istanbul Sultangazi Public Education Center	
	Istanbul Esenyurt Public Education Center	
	Istanbul Bağcılar Public Education Center	
	Istanbul Esenler Public Education Center	

4.0 STAKEHOLDER ENGAGEMENT APPROACH

This section provides an overview of the stakeholder engagement approach for different phases of the Project as described below:

- Phase 1: ESIA Study Consultations (completed)
- Phase 2: ESIA Report Disclosure (current phase)
- Phase 3: Construction (future consultations)
- Phase 4: Operation (future consultations)

Phase 1 is ongoing and the results of stakeholder engagement activities in this phase as well as previous consultation activities are explained in Section 5. Engagement activities for Phase 2 and Phase 3/Phase 4 are provided in Section 6 and Section 7, respectively.

Istanbul PPP A.S. will use different consultation approaches and methods for different phases of the Project activities and for different stakeholder groups. The main communication methods and mechanisms that have been and/or will be used to consult with key stakeholders in each phase are summarized in Table 4-1.

Table 4-1: Project phases and proposed engagement approach

Project Phase	Engagement Approach
Phase 1: ESIA Study Consultations	<ul style="list-style-type: none"> • Face-to-face meetings with selected governmental authorities • Face-to-face meetings with muhtars of the surrounding neighborhoods • Face-to-face meetings with the surrounding facilities, if needed • Sending out Project Information Documents to selected governmental and non-governmental organizations (previously conducted) • Sending out Project Information Document and Project Information Leaflet to selected neighborhoods • Newspaper advertisements (previously conducted) • Handouts distributed to public to inform them about public consultation meeting (previously conducted) • Phone calls to muhtars of selected neighborhoods to inform them about the Project and invite them to the public consultation meeting (previously conducted) • Public consultation meeting (previously conducted) • Using an email address to collect views (previously conducted) • Disclosure of information in the Project website • Setting up a Grievance Mechanism
Phase 2: ESIA Report Disclosure	<ul style="list-style-type: none"> • Disclosure of Non-Technical Summary of the ESIA Report in the Project website • Engagement with vulnerable groups, if any, through relevant muhtars • Information disclosure to vulnerable groups, if any, through muhtars
Phase 3: Construction	<ul style="list-style-type: none"> • Project website to disclose Project information and Project updates • Newspaper announcements • On-going communications with relevant regulatory stakeholders and public, as necessary
Phase 4: Operation	<ul style="list-style-type: none"> • Implementation of a Grievance Mechanism • Operation of a call center during operation

5.0 STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN TO DATE

Stakeholder engagement activities for the Project have started during the scoping stage and continued during the preparation of the ESIA report. Stakeholder engagement activities were also conducted during the preparation of the previous Draft ESIA Study dated October 2014. All stakeholders mentioned in the lists in section 3 were contacted during the previous Draft ESIA study.

The main communication methods and mechanisms that were used to consult with key stakeholders during the previous ESIA study included:

- Information about the Project and potential impacts to be provided to stakeholders via project document and leaflets
- Face-to-face meetings with selected governmental authorities
- Face-to-face meetings with selected headmen of neighborhoods around the Project site
- Public consultation meeting
- Local newspapers (for announcements related to public consultation meeting)
- Project website (for providing information about the Project)

The summary of consultation activities that were conducted within the scope of the previous ESIA study are provided below:

- Face-to-face meetings were held with the following governmental authorities:
 - Ministry of Health, Department of Public Private Partnership
 - Ministry of Health, General Directorate of Health Services
 - Ministry of Health, General Directorate of Management Services
 - Ministry of Health, Public Hospitals Institution
 - Istanbul Provincial Directorate of Health
 - Istanbul Metropolitan Municipality, Directorate of Transport Planning
 - Istanbul Metropolitan Municipality, Department of Rail Systems
 - Basaksehir Municipality
- Face-to-face meetings were held with the selected headmen of neighborhoods supported by questionnaires to collect information on social data.
- Relevant selected NGOs were approached to conduct face-to-face meetings.
- Identified governmental authorities (107 agencies) and NGOs (53 agencies) were sent a Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.
- A project information pack (including 5 Project Information Documents, 25 Project Information Leaflets and 25 Comment/Grievance Forms) were sent together with a cover letter to headmen of 13 neighbourhoods located within a diameter of 10 km to the Project site (considering the potential for traffic impacts to be felt up to this distance) to provide information on the planned Project and related impacts, ongoing environmental and social impact assessment and to provide opportunity to express views and concerns about the

project, and to inform how views/concerns can be submitted. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.

- A Public Consultation Meeting was held on 3rd January 2014 in Basaksehir District. Eleven people participated the meeting. The meeting was announced via advertisements in one national newspaper sixteen days in advance of the meeting, and the advertisement was repeated at the same newspaper and also announced in a second national newspaper one week after the first announcement.
- A Project specific email address to be used during the ESIA study was created to collect opinions via email.
- A Project specific website was established where the Project Information Document, Project Information Leaflet and Comment/Complaint Form were made available to the public.

Within the scope of the present ESIA study, face-to-face meetings were held with the selected headmen of neighborhoods supported by questionnaires to collect recent information on social data.

The key issues that were raised during the face-to-face meetings with governmental authorities and headmen as well as key issues that were mentioned in the official response letters and during the public consultation meeting are presented below.

Face-to-face meetings with governmental authorities

- Information on the communication made with the Ministry of Environment and Urbanization (MoEU) reveals that the Project is exempt from the EIA regulation
- Previous plannings related to the Project area
- Planned road projects and metro extension around the Project area which are independent of the Istanbul Ikitelli IHC Project
- Information on no expected hospital closures directly related with the İkitelli IHC Project within the health region for which Ikitelli IHC will provide service
- Presence of inadequate number of doctors in Istanbul

Face-to-face meetings with headmen

- Dust and noise emissions during construction
- Increase in traffic load during construction and operation phases
- Request for further information on the Project
- Positive impacts including job opportunities, easy access to health services and increase in land prices and rents

Response letters from governmental authorities

- Official view of MoEU stating that the Project is exempt from Turkish EIA Regulation
- Waste management and disposal practices
- Compliance with Occupational, Health and Safety (OHS) Law and relevant OHS regulations
- Undertaking necessary measures to manage increases in traffic in local roads during operation of the IHC
- Need for the metro to become operational before the health campus starts operation
- Need for high-capacity parking in the IHC

- Provision of transportation between the units of the hospitals
- Suggestions to have hotel/accommodation services for patients and their relatives who come from out of town
- Inclusion of a dental polyclinic in the health campus
- Inclusion of day nursery for the children of the employees and housing/resting and sports facilities for the employees
- Need for undertaking comprehensive surface investigation followed by evaluation of the archaeological potential of the site based on the report and photographs of the surface investigation, by the Istanbul 1st Cultural Assets Protection Regional Board Directorate (already completed)

Public (during public hearing)

- Presence of commercial areas in the IHC where pharmacies, medical shops, optician shops and similar can be opened

No written comments were received by the NGOs. Relevant selected NGOs were approached to conduct face-to-face meetings during the previous ESIA study, however no response was obtained.

6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING ESIA REPORT DISCLOSURE

The disclosure period for the results of the ESIA Report is expected to start in late June 2017 for a period of 30 days. The objective of the disclosure period is to inform the stakeholders about the Project activities, impacts, proposed mitigation measures and monitoring.

The following Project documents will be disclosed in English and Turkish languages in the Project website (<http://www.pppikitellihastanesi.com/>):

- **Non-Technical Summary (NTS)** of the ESIA Report

In addition to the disclosure of documents in the Project website, the following activities will be conducted:

- The hardcopies of the Non-Technical Summary of the ESIA Report will be distributed to district heads of Istanbul.

With the start of the disclosure period, comments can be submitted via email or in writing to:

Istanbul PPP Sağlık Yatırım A.S.
Refik Belendir Sok. No: 110/2 Yukarı Ayrancı - ANKARA
E-mail: info@rsy.com.tr
Telephone: 0 312 441 31 41
Fax: 0312 442 59 48

On completion of the disclosure period, the ESIA Report will be finalized by reflecting the comments received during the disclosure period where required.

7.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING CONSTRUCTION AND OPERATION PHASES

Stakeholder engagement activities will continue during the construction period which will then be followed by engagement activities during 26-year operation period. Consultation activities during construction and operation phases are important in order to maintain constructive relationships both with the local communities and other stakeholders. There will be a Community Liaison Officer during construction and operation phases who will be the main contact person to handle comments and grievances. Istanbul PPP A.S. will be responsible for updating SEP on a regular basis during construction and operation phases. Although not finalized yet, planned engagement activities are briefly outlined below. The main engagement methods for different types of stakeholders are also summarized in Table 7-1.

Construction Phase

- Project information will be disclosed at the Project website as deemed necessary.
- A noticeboard will be kept present at the entrance of the Project site in order to share the Project information with the local people and to provide the name of site manager or community liaison officer where complaints can be submitted in person, not only in writing.
- Meetings, as deemed necessary, with national and local authorities will continue during construction phase related to permitting and other issues.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- A systematic scanning of the press will be carried out to ensure that negative press articles are considered and assessed.
- Any activities likely to cause particular disturbance (such as noisy activities etc.) to the nearby neighbourhoods will be announced through handouts to be distributed to local people via muhtars offices. This information will also be provided in the Project website.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 9.
- The security staff at the construction site will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.
- In order to ensure maintaining the grievance mechanism, there will be clear and visible information on the Project website and phone numbers for people to submit their grievances. In addition, phone numbers and website information will be posted on the construction site signs.

Operation Phase

- The Project website will be updated to include information on operation activities and any changes in environmental policy, plans and procedures that are followed.
- Ongoing meetings, as deemed necessary will be conducted with the national and local communities to inform them of any changes in Project activities and related to permitting.
- Ongoing meetings with the Ministry of Health will be conducted as necessary.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.

- A systematic scanning of the press will be carried out to ensure that negative press articles are considered and assessed.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 9.
- The security staff at the hospital will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.
- In order to inform people widely about the grievance mechanism, there will be clear and visible information on the Project website. In addition, there will be a call center to manage the grievances.

Table 7-1: Engagement methods during construction and operation phases

Project Phase	Stakeholder Type	Engagement Approach	Responsibility
Construction	Neighboring land users and local communities	<ul style="list-style-type: none"> • Project website for Project updates • Noticeboard to share Project information with the local people and to provide the name of community liaison officer (CLO) or site manager • Implementation of grievance mechanism • Making comment/complaint forms available at the construction site office • Face-to-face meetings with local residents/muhtar/ nearby facilities with regular periods or upon a grievance • Newspaper advertisements if needed 	Istanbul PPP A.S. and Contractor of Istanbul PPP A.S.
	Governmental authorities	<ul style="list-style-type: none"> • Face-to-face meetings with MoH as needed and other authorities related to permitting issues • Official written correspondence with authorities 	
	Construction workers	<ul style="list-style-type: none"> • Implementation of grievance mechanism • Training on environmental, health and safety aspects • Consultation related to implementation of relevant management plans (i.e. Construction Camp Management Plan) 	Contractor of Istanbul PPP A.S.
Operation	Neighboring land users and local communities	<ul style="list-style-type: none"> • Making comment/complaint forms available at the security gates 	Service Provider of Istanbul PPP A.S. or MoH – depending on the subject of comment/ complaint
	Employees of Istanbul PPP A.S. (including sub-contractors and their staff)	<ul style="list-style-type: none"> • Project website to disclose Project information and Project updates • Newspaper announcements, if needed • On-going communications with relevant regulatory stakeholders and public, as necessary • Implementation of the Grievance Mechanism 	Istanbul PPP A.S. and Service Provider of Istanbul PPP A.S.
	MoH staff	<ul style="list-style-type: none"> • On-going meetings with the administrative staff of MoH 	Istanbul PPP A.S. and Service Provider of Istanbul PPP A.S.
	MoH staff	<ul style="list-style-type: none"> • Implementation of grievance mechanism 	MoH
	Patients and Patients' visitors	<ul style="list-style-type: none"> • Establishment of a Patient Communication Unit inside the IHC in line with Patient Rights Regulation 	

8.0 SCHEDULE FOR ESTABLISHMENT OF THE PROJECT

The schedule for consultation and disclosure activities and the proposed tentative timeline for future activities of the Project are provided below:

Milestone	Schedule
Development of the Draft ESIA Report	January, 2017
Development of the Final Draft ESIA Report	Late February, 2017
Disclosure of Non-Technical Summary	Late June 2017 for a period of 30 days
Start of construction activities	Second quarter of 2017 for a period of 3 years
Start of operation activities	Third quarter 2020 for a period of 25.5 years

9.0 GRIEVANCE MECHANISM

A grievance mechanism will be established in order to ensure that all comments, suggestions and objections received from the project stakeholders especially from the nearby surrounding communities and facilities are dealt with appropriately and in a timely manner. It is important to note that there will also be a separate grievance mechanism for workers/employees during construction and operation phases and for patients during operation phase. Of specific to the operation phase, Istanbul PPP A.S. will only be responsible for the management of grievances related with the services it provides and also grievances of workers that are working at these services. Grievances related with the health services or grievances by the health personnel will be under the responsibility of MoH.

Local communities will be informed via visits to headmen about the grievance mechanism during the consultation and disclosure activities. All grievances will be recorded, responded and resolved in a defined timeframe. The planning of the grievance mechanism is currently at a planning stage. There will be a full-time, site based Community Liaison Officer (CLO) to whom comments and grievances can be submitted to via face-to-face meeting, mail, e-mail or fax during the construction and operation stages as well as through the Project website and telephone numbers/call center. Comments/grievances that are submitted to Istanbul PPP A.S. Ankara Head Office will be forwarded to the site based CLO for resolution. A Comment/Grievance Form is presented in Annex A.

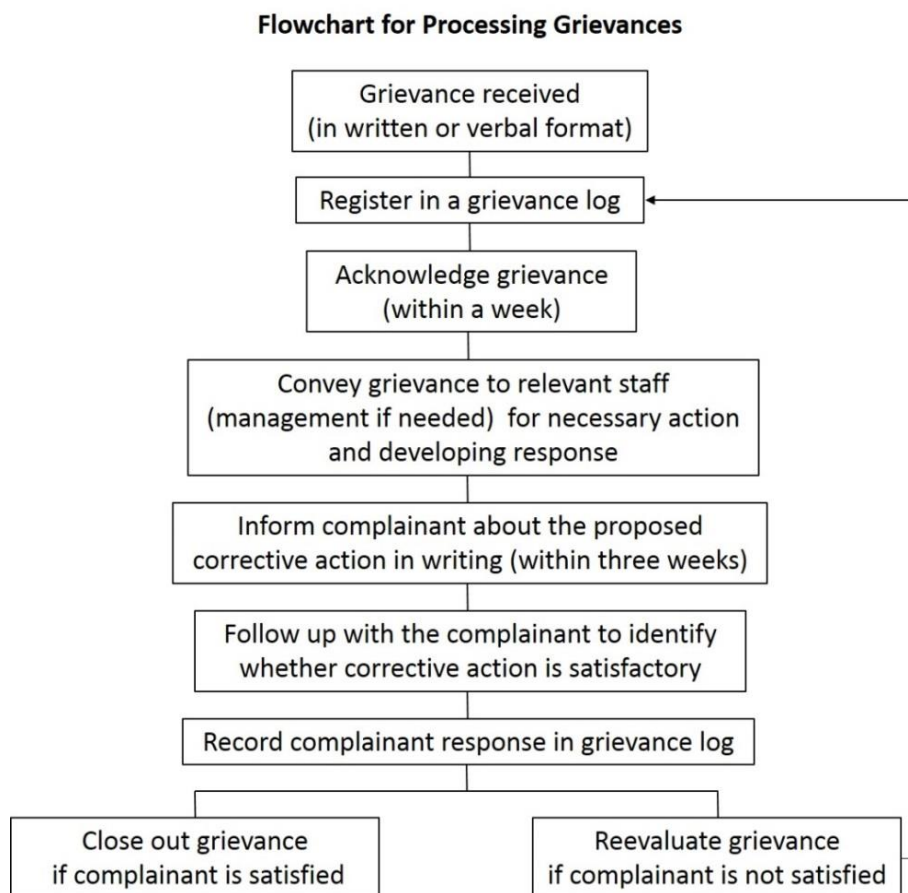
The anticipated procedure to handle grievances during construction is described below:

1. All grievances submitted by the stakeholders in verbal and written will be considered. Verbal grievances will be written on grievance forms by the responsible person (i.e. community liaison officer).
2. All grievances will be reflected in a grievance log to ensure that each grievance is assigned an individual number and that consistent tracking and corrective actions are carried out. The grievance log will contain:
 - Date of submission of the grievance
 - Reference number
 - Contact details of the complainant
 - Content of the grievance
 - Identification of parties responsible for the resolution
 - Dates when the investigation was initiated and completed
 - Findings of the investigation
 - Proposed corrective action
 - Date of response sent to the complainant (unless it is anonymous)
 - Statement of satisfaction of the complainant
 - Date of closing out the grievance
 - Any outstanding actions for non-closed grievances
3. The grievance will be formally acknowledged within a week after submission. If the grievance is not well understood or if additional information is required, complainant will be contacted for clarification.
4. The grievance will first be evaluated by the community liaison officer and then conveyed to the relevant staff and management, if necessary to identify what actions need to be taken, and an appropriate response will be developed. The complaint action form will be filled in as presented in Annex A.

5. The complainant will be informed about the proposed corrective action in writing three weeks after the grievance is acknowledged and the date of response to the complainant will be recorded in the grievance log.
6. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log.
7. The grievance will be closed out and the close out date will be recorded, if the complainant is satisfied with the action taken. If not, further assessment is needed and reevaluation of the grievance is required.
8. It is envisaged that the grievances will be resolved within one month after receipt. If this is not possible, the complainant will be informed about the progress on a regular basis.
9. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.

In addition to grievances, comments will be reviewed once a week to identify if they require a response. In case the comment requires a response, an appropriate response will be developed by the Project team in a month after the submission date of the comment. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

A flowchart for processing grievances is given below.



The planning of the grievance management process particularly for operation phase is still ongoing. It is expected that a call center will manage the grievance system of Istanbul PPP A.S during operation phase. If any grievance related with health services is obtained, the grievance will be conveyed to MoH and people giving the grievance will be informed about this action accordingly. It is important to note that there is already a hotline (184) known as 'MoH communication center' which is used to submit grievances related with health services all over Turkey. It is expected that this hotline will continue to be used during the operation of Ikitelli IHC through which MoH can receive grievances.

The main contact details for submitting grievances are provided below:

İbrahim Dursun (CLO) - Istanbul PPP Sağlık Yatırım A.S.

Başakşehir mah. G-432 Bulvarı No: 2/B Başakşehir / İstanbul

E-mail: Ibrahim.dursun@ronesans.com

Telephone: +90 (212) 777 90 98

Internal telephone: +90 (212) 5243024

Any comments/grievances that are submitted to Istanbul PPP A.S. Ankara Head Office will be forwarded to the site based CLO for resolution.

10.0 RESOURCES AND RESPONSIBILITIES

The implementation of this SEP will be conducted and monitored by Istanbul PPP A.S. There will be a full-time, site based CLO who will be the focal point for resolution of community complaints and grievance cases.

The contact details of the Community Liaison Officer (CLO) are given below:

İbrahim Dursun (CLO)

Başakşehir mah. G-432 Bulvarı No: 2/B Başakşehir / İstanbul

E-mail: Ibrahim.dursun@ronesans.com

Telephone: +90 (212) 777 90 98

Internal telephone: +90 (212) 5243024

11.0 REPORTING

All comments and grievances received will be recorded in a comment log and grievance log, respectively. SEP monitoring and evaluation reports including general performance/sustainability aspects of the Project will be disclosed to stakeholders periodically by Istanbul PPP A.S.

ANNEX A

Comment/Complaint Form

IKITELLI INTEGRATED HEALTH CAMPUS PROJECT- COMMENT/COMPLAINT FORM		
INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by Istanbul PPP Sağlık Yatırım A.Ş.)		
Full Name:		
Date:		
Contact Information: (Please provide necessary information based on how you wish to be contacted)		
By mail		
By phone		
By e-mail.....		
Indicate your purpose: <input type="checkbox"/> Comment <input type="checkbox"/> Complaint Recorded by: <input type="checkbox"/> Person submitting comment/complaint <input type="checkbox"/> Other (please specify who)		Signature confirming receipt of completed Comment/Complaint Form copy
YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)		
INFORMATION ABOUT YOUR COMPLAINT		
Describe the Complaint (Continue on the back of the sheet if required)		
Date of Incident Regarding Complaint		
<input type="checkbox"/> One time incident/grievance (Date)		
<input type="checkbox"/> Happened more than once (how many times?)		
<input type="checkbox"/> On-going (currently experiencing problem)		
What would you propose to resolve the problem? (Continue on the back of the sheet if required)		
This section will be filled by Istanbul PPP Sağlık Yatırım A.Ş.		
STATUS OF COMMENT		
Comment Logged (Y/N)	Date of submission:	Logged by:
Response Required (Y/N)	Date of response sent:	
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature:

ANNEX B

Complaint Action Form

(to be used by Istanbul PPP A.S.)

COMPLAINT ACTION FORM

Information about the complainant		
The reference number of the complaint (taken from the grievance log)		
Date of grievance submission		
Describe all the details relevant to the complaint		
Describe apparent cause of incident		
Immediate action required		
Identify preventative action (if required)		
<i>Continue on seperate sheets as required.</i>		
Desicion of the measures to be taken by HSE responsible	Name	Signature and date
Person responsible for corrective action	Name	Signature and date
Completion by	Name	Signature and date
Verification by	Name	Signature and date