REPUBLIC OF TÜRKİYE
MINISTRY OF INDUSTRY AND TECHNOLOGY

TÜRKİYE GREEN INDUSTRY PROJECT
Component-3

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FEBRUARY 2023

GLOSSARY

Consultation: The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

Dialogue: An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.

Grievance Mechanism: It is a mechanism that has been developed for potential use by project stakeholders to achieve mutually agreed resolutions for their grievances. It ensures that complaints and grievances are addressed through a transparent and impartial process.

Non-Governmental Organizations (NGOs): A non-governmental organization (NGO) is a group that functions independently of any government. It is usually non-profit. NGOs, sometimes called civil society organizations, are established on community, national, and international levels to serve a social or political goal such as a humanitarian cause or the protection of the environment.

Partnerships: In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

Stakeholder: Refers to individuals or groups who: (a) are affected or likely to be affected by the project (*project-affected parties*); and (b) may get involved directly or/and have an interest in the project (*other interested parties*).

Stakeholder engagement: It is a continuous process used by the project to engage relevant stakeholders to generate sense of ownership to the project and for a clear purpose to achieve accepted outcomes. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, stakeholder involvement in project monitoring, reporting to stakeholders and management functions. It includes both state and non-state actors.

Stakeholder Engagement Plan (SEP): SEP is a useful tool for managing communications with the project stakeholders. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

Project: Refers to Türkiye Green Industry Project

ACRONYMS AND ABBREVIATIONS

CAB	Conformity Assessment Bodies
CBAM	Carbon Border Adjustment Mechanism
CSO	Civil Society Organization
DGI	Directorate General of Industry
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
EU	European Union
GBV	Gender Based Violence
GM	Grievance Mechanism
GoT	Government of Türkiye
IPA	EU Instrument for Pre-accession Assistance
KOSGEB	Small and Medium Enterprises Development Organization of Türkiye
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MoIT	Ministry of Industry and Technology
MoT	Ministry of Trade
MoTF	Ministry of Treasury and Finance
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MYK	Vocational Qualifications Authority
NGO	Non-Governmental Organization
OIP	Other Interested Parties
PAP	Project Affected Parties
PIU	Project Implementation Unit
R&D	Research and Development
SA	Sectoral Association

SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SMEs	Small and Medium Sized Enterprises
TA	Technical Assistance
TSE	Turkish Standards Institute
TÜBİTAK	The Scientific and Technological Research Council of Türkiye
TÜRKAK	Turkish Accreditation Body
WB	World Bank

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1. INTRODUCTION / PROJECT DESCRIPTION

1.1. Introduction

Green transformation is no longer based on volunteerism and has become a necessity. The responsibilities of producers, consumers, non-governmental organizations, business organizations and governments are increasing in the fight against climate change. One of the most important concrete steps taken is the Paris Climate Agreement, which aims to limit global warming to 1.5 °C if possible. The 196 countries that are party to the agreement declare their National Intent Contribution Statements in line with the principle of common but differentiated responsibilities. In addition, countries go one step further in the fight against climate change and set their net zero emission targets.

The European Union (EU), which wants to play a leading role in the fight against climate change, announced the European Green Deal in 2019. One of the most important policy instruments that the EU plans to put into effect within the scope of this the Carbon Border Adjustment Mechanism (CBAM). With this regulation, the EU aims to reduce greenhouse gas emissions both within its borders and at the global level. One of the countries that will be most affected by the CBAM, which the EU plans to implement, will be Turkey, which realizes about 42 percent of its exports and about 32 percent of its imports with the EU.

Aware of the increasing effects of climate change, Turkey announced its Green Deal Action Plan in July 2021. The general framework of the action plan consists of nine main titles: Carbon Regulations at the Border, Green and Circular Economy, Green Finance, Clean, Economic and Safe Energy Supply, Sustainable Agriculture, Sustainable Smart Transportation, Tackling Climate Change, Diplomacy and Awareness Raising activities. Within this plan, Turkey aims to raise awareness and motivate consumers and producers to adapt to the green transformation process.

Türkiye's geographic, climatic, and socioeconomic conditions make it highly vulnerable to the impacts of climate change and other environmental hazards, making climate adaptation and resilience high priorities. Türkiye has high vulnerability on 9 out of 10 climate vulnerability dimensions, compared with a median of 2 out of 10 in other Organization of Economic Co-operation and Development (OECD) countries. Its transport system is more vulnerable than those of comparator countries, and the country is also experiencing food security issues, increasing water stress and unprecedented disasters, such as the devastating and 2021 forest fires. This vulnerability is due to a combination of climate factors, population exposure (for example, the share of the population exposed to floods and forest fires), and socioeconomic factors (such as the share of agriculture in the economy).

Although Türkiye's greenhouse gas (GHG) emissions growth has been slower than its economic growth and its per capita emissions are lower than in OECD or EU countries, there is a strong case for pursuing strong mitigation policies in Türkiye. The energy sector, including the energy consumption in the power, transport, building, and industrial sectors, is the country's single largest contributor to GHG emissions, accounting for three-quarters of total emissions. Türkiye's power, transport, and agriculture sectors are less carbon-intensive than the EU average—partly due to the large penetration of renewable energy (RE) in Türkiye's power system and low motorization rates. However, coal dependency is high and set to increase further under current investment plans. And the building sector (residential and non-residential) is less energy-efficient than the EU average. Manufacturing is more carbon-intensive than the EU average, exposing Türkiye to risks, if the EU introduces the Carbon Border Adjustment Mechanism (CBAM). Türkiye's forested landscapes act as carbon sinks, reducing the country's net carbon emissions.

As a country that faces significant vulnerability to the impacts of climate change, Türkiye has made ambitious climate change commitments, ratified the Paris Agreement in October 2021 and committed to net zero emissions by 2053. The intensification of climate-related events in recent years—including floods, forest fires, and sea pollution—and the potential implications of the European Union (EU) Green Deal for Türkiye's economy have contributed to the urgency of the country's climate change agenda. Most recently, the war in Ukraine and attendant energy supply disruptions and price increases highlight risks for countries like Türkiye that rely on fossil fuel imports, underscoring the urgency of climate action in support of energy security and affordability.

Türkiye has taken significant steps in the institutionalization of environmental authorities and drawing up environmental legislation in the last four decades. The country has a strengthened and comprehensive environmental regulatory framework that can support decarbonization and circular economy actions across sectors. However, the implementation of environmental regulations needs significant improvement. Several targets have been determined in terms of waste recycling and recovery, and renewable energy utilization to support circular economy implementation.

In doing so, Turkiye will contribute to achieving the overall climate, environmental and energy goals which was reported in both national and international documents, while supporting economic growth, job creation and social inclusion. By making materials last for longer, ensuring their value is retained for as long as possible and boosting the use of recycled content in products, it will promote decoupling of economic development from natural resource use and reduction of material dependencies, improvement of renewable energy resources – thus fostering Turkiye open strategic development and resilience although several recent events have reminded us of the possible vulnerabilities of global supply chains.

1.2. Project Overview

This project is designed to accelerate the green transformation in Industry and thus intensify decarbonisation efforts. The total budget of the Green Transformation Project in Industry, which will be carried out by MoIT with the support of the World Bank, has been determined as 450 million USD. The project duration is five years and the project partners are MoIT, KOSGEB and TUBITAK. The project consists of three components.

Under Component-1; 265 million USD reimbursable grants will be provided by KOSGEB for green transformation activities of SMEs. With the reimbursable grants in question, renewable energy, resource efficiency, waste management, circular economy, etc. The activities to be carried out by industrial enterprises in thematic areas will be supported. The component will support manufacturing SMEs to adopt green transformation plans to increase resource efficiency. The component will raise awareness among SMEs about current and future sustainability requirements in local and export markets, potential technologies to improve firm sustainability and their expected impact on firm performance, and recommended standards for green sustainability (such as international green product certification). The component will provide reimbursable grants to finance SMEs' plans for upgrading their machinery, acquiring new technologies, obtaining technical assistance, green certifications and/or other interventions to facilitate the transition to more resources.

In scope of the Component-2, 160 million USD reimbursable grants will be provided by TÜBİTAK for projects related to green transformation. The second component will target any firm engaged in green innovation activities involving the development of new green technologies, products or processes in Turkey or other markets. Support for green start-ups, SMEs or large firms or firm consortiums will include

R&D, prototype development, standards development, and new product or process development that contribute to green production or higher energy and/or resource efficiency. The component will provide reimbursable grants for companies to implement green R&D activities, upgrade new or existing machines, licensing new technologies, hiring R&D personnel, obtaining technical assistance, prototypes, patent application, developing/approving green standards, etc.

The Ministry of Industry and Technology will be responsible for the general management of the project and will manage the sub-components (SCs) foreseen below with a budget of 25 million USD under the Component-3:

- SC-1 Project Management
- SC-2 Needs Analysis
- SC-3 Capacity Development
- SC-4 Green Industry Academy
- SC-5 Green Tracking System
- SC-6 Promotion and Dissemination

The general objectives of the activities to be carried out under Component-3 are as follows:

- Analyzing the needs for green transformation in industry (by sector and technology).
- Define the green technology taxonomy.
- To develop the institutional capacities of the project partners and stakeholders.
- To improve the capacity of the manufacturing sector by training certified green transformation experts in the manufacturing industry and sub-sectors.
- To design the infrastructure for «Green Industrial Enterprise» certification.
- To develop green transformation indicators at the sectoral level and to establish an information management system that monitors the green transformation of the industry.
- To raise awareness at the national level about green transformation.

SC-1 Project Management: The aim of this sub-component is to manage the implementation of project activities in collaboration with Project partners and stakeholders. Thus, it will be ensured that the project resources are managed effectively and that the project targets are reached in a timely and complete manner.

SC-2 Needs Analysis: The main aim of this SC is to define the green technology taxonomy and determine greenhouse gas reduction potential at sectoral level by technology needs assessment studies. Therefore, key green transformation needs would have been identified in order to support industrial firms and green R&D efforts at the end of project.

SC-3 Capacity Development: The objectives of related SC are to provide technical assistance and capacity building for MoIT and Project Partners. The outcomes would have been obtained which are establishing and raising a critical mass of experts of the project stakeholders, green transformation evaluators and consultants, facilitators and practitioners of the green transformation approach.

SC-4 Green Industry Academy: The main objectives of related SC is to improve the capacity of manufacturing sector by training certified green transformation (GT) experts within the sub-sectors and identify the green firms. Expected outcomes are to facilitate learning and sharing of best practices especially in green energy, resource recycling, green factories and green value chains, to build the capacity of project target group and create greater awareness of GT, experts in the priority areas to assist other industrial enterprises.

SC-5 Green Tracking System: Aim of the sub-component is to develop industry-level indicators and establishment of a knowledge management system for green transformation of industry. And main outcomes are the measurement of GT indicators in the industry sector, analyzing the gaps among sub-sectors through benchmarking and impact assessment of the reimbursable grants. Also under this sub-component, it is aimed to establish the Green Transformation Excellence Award System Framework and Design for the Award Program to promote green transformation among industrial enterprises.

SC-6 Promotion and Dissemination: The objectives are raising awareness among enterprises and disseminating project results and outputs during project. As a result, improved awareness among organizations, companies and individuals involved in green transformation, facilitated networking with various stakeholders and increased national visibility of green transformation efforts would be ensured.

Figure 1 Results Chain of the Project

Challenges	Project Components/Sub-components	Outputs	Intermediate Outcomes	Results
Challenge # 1 Low collaboration between project partners and stakeholders during project to provide intended results. consequently.	_SC-1:_ Establishing project management system to ensure collaboration and progressing of applications in project steps.	- Kick-off Meeting Organization - Establishment of a Monitoring and Evaluation System for Project Activities - Organization of Project Implementation Unit (PIU) Meetings - Periodic Meetings with Project Stakeholders (Ministries, Sectoral associations,NGOs, etc.) - Goods Purchases (Servers, computers, printers, consumables etc.) - Rental Services (Office etc.) - External Specialist Procurement (Project manager, financial specialist, monitoring-evaluation specialist, social and environmental specialist, purchasing specialist, database manager, software developer etc.) - Reporting, Documentation and Archiving Services - Financial Management - PIU Secretariat Services - External Audit Services	Identified supports for industrial firms to evolve for green R&D efforts at the end of project.	- Implementation of transformation to green industry - Identified legislation process - Increased Industrial activity with high cooperation with partners

Challenge # 2 Undefined the green technology taxonomy and not to be explained the greenhouse gas emissions at the sectoral level with technology requirements	SC-2: Obtaining the needs for green industry transition in the scope of R&D, legislation and databases	- Sectoral Literature Research - Field Studies (Surveys etc.) - Sectoral Meetings with NGOs (Industry Associations) - Gap Analysis Study for Legislative Compliance - Membership and Licensing Services to Selected Databases - Translation Services - Preparation of Sectoral Reports and Guidelines	- Technical assistance to the MoIT (Directorate General for Industry) s on preparing, assessing, and evaluating the green economy - Adequately staffed Project Implementation Unit is established and maintained at MoIT	- More effective and sustainable government management of Industry and support of industrial transformation - Fulfilled all needs for green industry
Challenge # 3 Low capacity and productivity, as well as inefficient implementations for green industry transitions	SC-3: Technical assistance and capacity building	- Training of Experts Study Visits - Obtaining Translation and Publication Rights of Some Foreign Publications - Harmonization Studies with EU Acquis - Organization of National Workshops and Seminars	Technical assistance and capacity building to the MoIT (Directorate General for Industry) on preparing, assessing, and evaluating the capacity improvement fields	- More effective and sustainable government management of Industry - MoIT, PIU, capacity improvement in technical, investment planning, management, procurement, etc. - Effective citizen engagement processes - Increase in demand for gender-based violence support services in project regions

Challenge # 4 Low human resources about green industry transition for each process and fundamental elements	SC-4: Establishing an academy including training, certification programs to provide human resources	- Training of Experts Study Visits - Obtaining Translation and Publication Rights of Some Foreign Publications - Explaining Vocational Requirements Standardization Process	Technical assistance and construct an online training programs to MoIT (Directorate General for Industry) and industry	- More efficient and sustainable knowledge construction in industries to adapt - MoIT, PIU, capacity improvement in technical, investment planning, management, etc. - Increased the number of Green Indusrty Experts.
Challenge # 5 Undefined tracking system for industrial emissions, wastes	SC-5: Establishing a green tracking system to measure the problems risks and improvements and supports of industry	- Design and Installation of Green Tracking System Infrastructure - Database Management Services - Software Development and Other Required Licensing Services - Ensuring Integration with Other Databases which are set both in MoIT and other institutions - Impact Assessment Studies on Reimbursable grants s Provided to Beneficiary Firms through the Green Tracking System - Establishment of the Green Transformation Excellence Award System Framework and Design for the Award Program	Technical assistance and construct an racking systems to MoIT (Directorate General for Industry) in terms of decarbonizatio n progresses.	- Effective decarbonization process monitoring system to be directed the industry for green economy. - Provided to other institutions the obtained information from industry via databases set in MoIT. - Established an effective database and award mechanism to manage whole fields set out in green industry or high qualified management and strategical planning systems for green industry

Challenge # 6	SC-6:	- Preparation and Management of Project Communication Strategy - Design and Installation of Project Web Portal - Project Introduction Meetings (Launch, Press Conferences etc.) - Design and Printing of Promotional Materials and Other Materials (Brochure, Bulletin etc.) - Advertising, Public Relations and Other Promotion Activities - Design and Management of the Project's Social Media Accounts - Printing and Distribution of Project Outputs - Translation Services for Project Documents - Obtaining Translation and Publication Rights of Some Foreign Publications	Technical assistance to MoIT (Directorate General of Industry) for activities, applications, web portal studies	- Further information and application improvement for green industry process - Established an effective notification mechanism about green industry
Low awareness for green industry and information about the benefits of transformation in industry to	Implementing promotion and dissemination activities to improve the knowledge			

1.3. Environmental and Social Risks of the Project

The main purpose of the project is to increase the activities and investments for green transformation in the industrial sector, thus reducing the carbon emissions originating from the industry. The focus of the activities to be carried out under the third component is to ensure coordination among all stakeholders so that the project outputs will yield the most effective results. Activities such as raising the awareness of companies operating in the manufacturing industry on green transformation, determining the needs in this field, and establishing the necessary legislative infrastructure for green transformation will be carried out under this component. Therefore, the outputs of these activities will indirectly have positive effects on the environment. Likewise, it is considered that activities such as establishing a green tracking system and training green transformation experts will have positive effects on the environment in the medium and long term.

The government laws and regulations governing environment and social risk mitigation will be duly applied to the Project in addition to the World Bank Environmental and Social Standards (ESSs).

There will be no construction activities in the scope of third component of the project. Almost all of the work to be done consists of desk jobs. The activities to be carried out in the field throughout the project generally consist of activities such as training, needs analysis, measurement, and meetings. The required labor laws and Bank procedures under ESS 2 for use of labor for Green Industry project activities are described in the Labor Management Procedure (LMP).

This Stakeholder Engagement Plan (SEP) intends to fulfil the requirements of ESS 10 Stakeholder Engagement and Information Disclosure of the Bank.

1.4. Objectives and Scope of the Stakeholder Engagement Plan

The objectives of this SEP are to:

- identify all stakeholders who are indirectly or directly affected by and/or interested in the project,
- outline modalities for information dissemination and stakeholder engagement activities, including their purpose, frequency and location during project preparation and implementation,
- ensure early identification of issues that may pose risks to the Project or its stakeholders;
- ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient);
- promote and provide means for effective and inclusive engagement ensuring long-term communication with project-affected parties throughout the project life on issues that could potentially create an impact
- elaborate on the blueprint for a functional grievance redress/beneficiary feedback mechanism and provide project affected parties with accessible and inclusive means to increase issues and grievances and ensure that these grievances are responded and managed in a timely manner;
- ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format. And
- define the roles and responsibilities of different actors to implement and monitor these activities.

The SEP for Türkiye Green Industry Project is structured as follows:

- **Section 2** outlines the relevant national regulations and the World Bank's Environmental and Social Standards,
- **Section 3** summarizes previous stakeholder engagement activities,
- **Section 4** covers the stakeholder mapping, segmentation and analysis,
- **Section 5** elaborates on a detailed stakeholder engagement program and key methods of engagement,
- **Section 6** focusses on SEP implementation arrangement,
- **Section 7** provides a description of the project's grievance mechanism, and
- **Section 8** explains overall monitoring and reporting process of the SEP.

2. REGULATIONS AND REQUIREMENTS

2.1. National Regulations

Table 1 summarizes the national legal and regulatory requirements that are relevant for the SEP.

Table 1. Relevant National Legal and Regulatory Requirements

Freedom of thought and opinion (Constitution, Article 25)

"Everyone has the freedom of thought and opinion. No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions."

Freedom of expression and dissemination of thought (Constitution, Article 26)

"Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities."

Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)

"Citizens and foreigners' resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Türkiye examines complaints on the functioning of the administration[1]."

Right to Constitutional Complaint (Constitution, Article 148)

"*Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities. In order to make an application, ordinary legal remedies must be exhausted.*"[1]

"Article 24, *Appeal process - The applicant whose request for information was rejected may appeal to the Board within fifteen days starting from the official notification before appealing for judicial review. Appeals should be written. The Board shall render a decision within 30 days*."

Law on the Right to Information (Articles 11)

"Article 11 - *The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days*."

The Environmental Impact Assessment Regulation No. 29186 (Article 9)

1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.

2.2. World Bank Environmental and Social Standard on Stakeholder Engagement

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, the requirements of ESS10 are:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will 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 and intimidation.

- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not." (World Bank, 2017: 98).

This standard requires that the Borrower prepares a Stakeholder Engagement Plan (SEP) that is proportionate to the nature and scale of the project and its potential risks and impacts, disclose it as early as possible before project appraisal, and seeks the views of stakeholders on the SEP, including on the identification of stakeholders and proposals for future engagement. An updated SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version (World Bank, 2017: 99). In addition, the Borrower should also develop and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100)[1].

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[1] Details for the WB Environmental and Social Standards are available at: www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards and *http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards*

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1. Key Stakeholder Meetings and Consultations

According to results of Science and Technology Commission of Türkiye's first Climate Forum, which took place in February 2022, will be utilized as the main scope of targeted topics. 33 technological solutions with 262 priority topics have been developed with approximately 100 experts from academia, industry and umbrella NGO's in 5 main themes: (1) Climate Change, Environment and Biodiversity; (2) Clean and Circular Economy; (3) Clean, Accessible and Secure Energy Supply; (4) Green and Sustainable Agriculture; (5) Sustainable Smart Transport. Themes 2, 3, 4 and 5 are directly related with the green transition of industry. In detail, Decisions No: 30,32, 36 and 43 are directly related to green industry in Turkiye and Decisions No: 14,87,82,212 and 215 include energy, green funds and circular economy. Thus, that project and related topics explain main function of this project to implement with stakeholders.

Six sub-components have been identified under Component-3, which will be implemented by MoIT. Then, the activities to be carried out within the scope of each sub-component were determined. While determining these activities, various interviews and meetings were held during the project preparation process. Preparatory work for SEP was planned and carried out by MoIT. The stakeholders of the project and their key roles were determined as a result of consultations by the project team of the MoIT.

To date stakeholder engagement efforts have included meetings with key stakeholders, including relevant ministries and other government agencies, representatives of other institutions.

Under Componet-3, wide participation stakeholder meeting was held on 25th January 2023 in MoIT. In this meeting, the planned studies and the contributions of the institutions to these studies were discussed. For planned work packages, MoENR representative stated that they will support the project in stages of developing the training contents, database infrastructure and the provision of the necessary data. Ministry of Environment, Urbanization and Climate Change (MoEUCC) representatives stated that the adaptation of industrial facilities to climate change is important, in this context, the adaptation of the industry should be ensured successfully. Also, MoEUCC explained the Industrial Emissions Directive published by European Commission is being studied and the legislation is expected to be completed in 2023. With this regulation, it is additionally stated that certification will be provided to industry companies on a voluntary basis. The representatives of Directorate of Climate Change form MoEUCC stated that for reduction of carbon and wastes emission, it is considered that it would be more appropriate to analyze based on fossil fuel consumption instead of electricity consumption. It is thought that it is important to implement such studies to address the fuel transformation in the sector, to change the composition of the manufacturing industry, and to increase the production with high added value. Ministry of Trade (MoT) representative explained that the loan to be given within the scope of the project should be given to the sectors that will be affected first within the scope of CBAM. SME companies such as textiles and chemistry can be considered firstly. It is considered that it would be useful to conduct a needs analysis from published documents that have already been studied. The representative of Vocational Qualification Authority (MYK) stated that it has grant support for exam and certification and renewable energy and green transformation will be given priority in the next supports. By the time, the institution emphasized the importance of joint work in determining the qualifications for the green transformation specialist within the scope of this project, in order to deal with the curriculum, training and examination processes within the scope of the project. Turkish Standards Institution (TSE) representatives stated that they will support the green certification of the industry, capacity training of institutions in this process, academic development, evaluation of institutions and reporting of their developments, and establishment of inspection mechanisms on green industry. TUBITAK MAM representative explained upon its efficiency

methodology and a regulatory impact analysis. That institution conducted feasibility studies for each company in textile sector particularly. The result of that study in the field, it has been witnessed to examine the environmental impact of the investments is very important factor so in that project TUBITAK MAM can provide support under subcomponents. KOSGEB for Component-1 also stated briefly the sectors affected by CBAM will be evaluated as a priority, and 1,750 companies were initially selected as the target in the scope of renewable energy and circular economy identified as subcomponents in that project. TÜBİTAK, for Component-2, has seen the project as an opportunity to provide reimbursable grant. TUBİTAK provide R&D and innovation support to companies under different programs according to relevant changes in its legislation.

Various potential stakeholders were also interviewed prior to the well-attended stakeholder meeting held on January 25th. The table below summarizes key aspects and inputs from these stakeholder engagement efforts.

Table 2. Summary of Meetings with Key Stakeholders

DATE	EVENT	PARTICIPATED STAKEHOLDERS
04.10.2022	Face-to-face Meeting	KOSGEB, TÜBİTAK MAM, TSE, Development Investment Bank of Türkiye (KYB), TSKB
12.10.2022	Face-to-face Meeting	World Bank, KOSGEB, TÜBİTAK MAM, TSE, Development Investment Bank of Türkiye (KYB), TSKB
19.10.2022	Face-to-face Meeting	KOSGEB, TÜBİTAK, TSE
07.11.2022	Face-to-face Meeting	MoTF
24.11.2022	Face-to-face Meeting	World Bank, KOSGEB, TÜBİTAK
07.12.2022	Face-to-face Meeting	TSE
09.12.2022	Face-to-face Meeting	World Bank
12.12.2022	Virtual Interview	Ministry of Environment, Urbanization and Climate Change - MoEUCC
13.12.2022	Virtual Interview	MoEUCC
14.12.2022	Virtual Meeting	TÜBİTAK and World Bank
15.12.2022	Info Sharing Days in Industry – II (Twin Transformation)	TÜSİAD
16.12.2022	COP27 UNCC Summit Evaluation Conference	Hacettepe University, REC Türkiye
19.12.2022	Face-to-face Meeting	KOSGEB
20.12.2022	Face-to-face Meeting	TÜBİTAK
21.12.2022	Face-to-face Meeting	Ministry of Energy and Natural Resources, KOSGEB, TÜBİTAK
21.12.2022	Face-to-face Meeting	MoIT DG for OIZ
21.12.2022	Face-to-face Meeting	World Bank
23.12.2022	Face-to-face Meeting	Ministry of Treasury and Finance
04.01.2023	Face-to-face Meeting	Ankara Social Sciences University (ASBÜ)
04.01.2023	Virtual Meeting	MoIT DG for Strategic Research and Productivity
06.01.2023	Face-to-face Meeting	MoIT DG for Strategic Research and Productivity
06.01.2023	Face-to-face Meeting	World Bank TÜBİTAK, KOSGEB
09.01.2023	Virtual Meeting	Adana Hacı Sabancı OIZ
10.01.2023	Climate Change Action Plan Workshop (Industrial Sector)	MoEUCC
11.01.2023	Face-to-face Meeting	MoEUCC
11.01.2023	Face-to-face Meeting	World Bank, TÜBİTAK, KOSGEB
13.01.2023	Face-to-face Meeting	MYK
17.01.2023	Virtual Meeting	Istanbul Chamber of Industry

18.01.2023	Virtual Meeting	TENMAK
19.01.2023	Face-to-face Meeting	MYK
20.01.2023	Face-to-face Meeting	World Bank
25.01.2023	Face-to-face Meeting	All Stakeholders

In addition to the stakeholder engagement activities described above, the World Bank (WB), in partnership with MoIT, has conducted stakeholder consultation meetings, missions and site visits with partners including NGOs, Strategy and Budget Office of Presidency. These pre-meetings were beneficial to form scope of the WB project. Also, meetings in MoIT among different departments of the Ministry were held to consult and agree on project components and implementation procedures to be incorporated in proposal documents. Meetings with MoENR and MoTF were also important to decide application to the WB reimbursable grants.

During the meetings with the stakeholders, information about the project was given, and areas where cooperation could be made in the activities designed under the third component were determined. After meetings and consultations with stakeholders, MoIT started to prepare the Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP) and other required documents.

TÜBİTAK and KOSGEB are the main stakeholders in the overall management of the project. Because the first component will be carried out under the responsibility of KOSGEB and the second component will be carried out by TUBITAK. In addition, it is foreseen that joint working areas will be created with different units of the Ministry in the process. As external stakeholders, the Ministry of Environment, Urbanization and Climate Change (MoEUCC) and the Ministry of Energy and Natural Resources (MoENR) are seen as the two most important ministries that can contribute to the acceleration of green transformation in the industry with their experience. In addition, it is important to include NGOs, especially sectoral associations, in the project and to benefit from their capacities in order to achieve the project objectives. On the other hand, green industry would be influenced directly by trade infrastructure so Ministry of Trade (MoT), Turkish Accreditation Body (TURKAK) and Conformity Assessment Bodies (CABs, Notified Bodies etc.) would be the other important stakeholders in green industry transformation according to legal technical basis. Depends on development of horizontal area, competent human sources would be needed since Vocational Qualification Authority (MYK) would be a stakeholder to manage related implementation. Therefore, certificated human resources would be provided to industry to support green transition from manufacturing to marketing within identified whole steps. In this context, the industry associations with which the General Directorate of Industry is in close contact have stated that they are ready to contribute to the project in any way possible.

After first drafts of these documents are developed, MoIT will hold a stakeholder engagement meeting in order to present key aspects of the project proposal, share scope of SEP and other procedures during the project preparation phase.

3.2. Disclosure of Environmental and Social Framework Documents

The draft SEP, together with project ESMF and LMP, will be disclosed on the website of the MoIT in both English and Turkish in order to obtain views and comments of relevant stakeholders. The documents will also be made available through the WB's external website. In addition to disclosure of ESF documents on their website, the ESMF and other ESF documents have been shared with the stakeholders via e-mail.

The stakeholders to which the SEP and other ESF documents shared and to which a specific e-mail explaining the purpose and functioning of the consultation process are listed below.

- Strategy and Budget Office of Presidency
- Ministry of Treasury and Finance
- Small and Medium Industry Development Organization
- The Scientific and Technological Research Council of Türkiye
- Ministry of Energy and Natural Resources
- Ministry of Trade
- Ministry of Environment, Urbanization and Climate Change
- Turkish Standards Institute
- Turkish Accreditation Body
- Vocational Qualification Authority (MYK)
- Sectoral Associations and Other NGOs
- Conformity Assessment Bodies
- Chambers of Industry

Feedbacks regarding the disclosed documents will be collected through official correspondences, online feedback forms, and e-mails to provide variety of means for the stakeholders to choose from while sending comments.

3.3. Lessons Learned from Previous Projects

The MoIT has no comparable project experience funded by the World Bank however it has a significant experience in engaging communities and stakeholders as the MoIT has managed EU-funded projects. It also has provided reimbursable grants s for the capacity building and technical improvements in terms of EU Acquis implementations, of which funding is allocated from the Ministry budget. MoIT has experience in working in a multi-stakeholder environment considering it is the Ministry responsible for sectors.

The project incorporates the lessons by MoIT's previous experience on stakeholder engagement, in parallel with implementation experience of its reimbursable grants for Turkish Industry as well as other similar projects in Türkiye.

The key lessons are as follows:
- The relevant stakeholders from public, private and non-governmental sectors must be identified based on their responsibilities on the project.
- The opinions of the stakeholders must be incorporated into the preparation phase of the project proposals to prevent any setback during the implementation phase.
- The stakeholders must be informed on developments regarding the project periodically both during the preparation and implementation phase.
- Each stakeholder must be asked to identify a contact person to ensure the continuity in communication. The contact person will be expected to participate in relevant meetings and project activities while the MoIT will be responsible to inform the contact person of any stakeholder on all developments.
- During the implementation phase, the feedback from stakeholders must be taken into consideration while preparing key documents, outputs, and taking important decisions.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

A key element of any SEP is effective identification of key stakeholders. Stakeholders are defined as individuals or groups who can affect, are affected by, or have a legitimate interest in the Project.

4.1. Project-Affected Parties

For the purpose of the SEP, the term "Project-Affected Parties" (PAPs) includes "those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities" (World Bank, 2018b). They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

4.2. Other Interested Parties

The term "Other interested parties" (OIPs) refers to "individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups" (World Bank, 2018b).

4.3. Disadvantaged/Vulnerable Individuals or Groups

At this stage, it is assessed that there are no vulnerable or disadvantaged groups relevant for the activities under the Component 3, which is managed by the MoIT.

As mentioned previously, identification of the vulnerable/disadvantaged individual/group has been undertaken during project preparation under Components 1 and 2. The SEP is a living document which will be updated in accordance with implementation of project and therefore this section of the SEP will be updated accordingly.

4.4. Stakeholder Mapping and Analysis

Stakeholder Mapping table below summarizes categorized project stakeholders with details regarding to their involvement, interest in or influence on the Project.

Table 3. Stakeholder Mapping

Stakeholder Groups		Details	Significance of Influence	Significance of Interest
Project Affected Parties (PAP)	**Industrial Enterprises**	In line with the final goal of the project, the group that will be most affected by the project outputs is the manufacturing industry enterprises. The practices of the Ministry that accelerate the green transformation in the industry will directly and positively affect the enterprises.	**High**	**High**
	Sectoral Associations (SAs)	These NGOs are vertical configuration according to each sector. SAs are main affected parties of this project. NGOs have been placed in Sectoral Committees established in MoIT. Upon approval of the Project by WB, SAs will be able to benefit from MoIT for activities to realize infrastructural and innovative objectives of their green production environments in line with goal of this Project.	High	High
		MoTF	High	High
		Strategy and Budget Office of Presidency	High	High
		MoEUCC	Medium	Medium
		MoENR	Medium	Medium
		Vocational Qualifications Authority (MYK)	Medium	Medium
		TÜRKAK (Turkish Accreditation Body)	Medium	Medium
	Conformity Assessment Bodies	**CABs** will have a key role to prove the green transformation of firms for each field in manufacturing process and products.	Medium	Medium
	Media	The media will have a key role in disseminating information on the efforts and results of the project	Low	Medium
Other Interested Parties (OIP)	**NGOs**	These NGOs are horizontal configuration according to environment, inclusive sectoral associations, sustainable development. These NGOs are other main affected parties of this project. NGOs have been placed in application, monitoring of under project defined as in work packages. Upon approval of the Project by WB, NGOs will be able to benefit from MoIT for activities to contribute to achieve intended goals with project partners.	High	High

| | Universities and Research Centers are studied on environment, emissions, recycling and sustainable development. These institutions have been placed in application, monitoring of under project defined as in work packages. They will be able to benefit from MoIT for activities to collaborate to accomplish intended goals with project partners. | Medium | Medium |
| **Universities & Research Centers** | | | |

The Stakeholder Analysis table below provides an analysis of stakeholders that have medium or high significance. However, those with low significance stated in the table will be also included in the stakeholder activities, as required.

Table 4. Stakeholder Analysis

Stakeholder	Concerns & Issues	Expectations from Project
Industrial Enterprises	• Needs for investment in the field of green transformation • Need for new machinery and equipment in the field of green technology • Need for skilled labor • Need to adapt to new legislation on green economy	• Establishment of green industry strategy • Analyzing needs and gaps to increase resource efficiency in industry • Accomplishing legislative alignment for the transition to the EU green agreement • Training of workforce with the necessary competencies for green transformation
Sectoral Associations	• Need to increase capacity building for competitiveness in green economy • Limited demand for Green Transformation • Lack of innovation facilities in green economy • Need to strengthen regulatory environment to mainstream green manufacturing	• Strengthened NGOs infrastructure and enabling the infrastructure to become greener, more efficient and more innovative • Harmonized of Technical Legislations to increase of global green market system.
NGOs	• Need to increase capacity building for competitiveness in green economy • Limited demand for Green Transformation • Lack of innovation facilities in green economy • Need to strengthen regulatory environment to mainstream green manufacturing	• Strengthened NGOs infrastructure and enabling the infrastructure to become greener, more efficient and more innovative • Harmonized of Technical Legislations to increase of global green market system.
Universities and Research Centers	• Need to improve research on green industry in terms of emissions, wastes, sustainability. • Limited research for Green Transformation and Innovation within new technologies	• Forwarded Universities and Research Centers to become a solution partners to provide new fields in green industry • Accelerated research topics on technology including materials, efficient products and green

		manufacturing
Strategy and Budget Office of Presidency	• Need to channelize the funds for green investments	• Provision of support about raising new funds for providing reimbursable grants for sectors
Conformity Assessment Bodies	• Need to improve the technical views of CABs. • Need to develop notified bodies according to harmonized legislations.	• Strengthened knowledge for measurements, certification to become greener, more efficient and more innovative
Ministry of Environment, Urbanization and Climate Change Technology	• Lack of of technical harmonization according to EU Aqcuis both for Green Taxonomy and technical legislations within the scope of green industry perspective. • Need to cooperate green monitoring system	• Increased building energy performance of factories or enterprises in terms of energy efficiency • Harmonized environment legislations based on EU Acquis to provide Circular Economy and Decarbonization • Increased collaboration to monetarize the emissions and wastes
Ministry of Energy and Natural Resources	• Need to cooperate and manage about green energy infrastructure such as solar energy in facilities in order to be built.	• Increased the use of renewable energy in facilities. • Modernized the industry according to green energy resources.
Ministry of Trade	• Need to harmonized all markets in scope of Custom Union and Green Economy to fasten the transformation	• Established new green systems in market compliant with Custom Union based on Green Industry perspective
MYK	• Need to raise green transformation experts. • Need to identified the such experts' requirements and certificate programs.	• Increase certified human resources to ensure the green industry transformation for industry
TURKAK	• Need to accredit the CABs for green industry according to harmonized legislation. • Need to accreditation programs for new legislations.	• Increased the accredited bodies to maintain certification process as a third-party body to accelerate the green industry activities on products.
Media	• Lack of information about the project • Need to disseminate information about the project's progress and successes	• Achievement of the Project targets and objectives

As is seen from Table 4, the stakeholders' expectations in the Project differs according to their influence on or interest in the project. DGI, which are the most affected party as they will be the beneficiaries of the reimbursable grants s supplied by the WB reimbursable grants acquired by the Project, have concerns about difficulty of the reimbursable grants' application procedures due to WB requirements. These concerns will be addressed by MoIT by adding more technical capacity building activities to the Project execution phase as well as designing the reimbursable grants application procedure in the sense that there should be no difference in terms of required paper work and bureaucracy between the reimbursable grants s provided by the self-funding of the MoIT and by the WB. One of the other concerns of the DGI is not being able to build enhanced green infrastructures or establish innovation center investments due to lack of technical capacity. In order to address these concerns and mitigate related investment risks, the Project will include activities for strengthening organizational and technical capacity of the DGI and MoIT. Also, the industries will be encouraged to collaborate with the universities and research institutes to

overcome technical difficulties during the reimbursable grants application process as well as implementing related infrastructural changes.

In order to achieve the Project objectives and to make use of acquired WB reimbursable grants, MoIT will execute necessary informative actions to help of other stakeholders. The Project aims to attract innovative firms and/or firms care for energy and resource efficiency to the industry and these firms may benefit from the reimbursable grants s. Thus, impact of the project is expected to reach to wider audiences through provision of proper and continuous technical assistance and capacity building activities during the life of the Project.

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1. Overview of Stakeholder Engagement Methods

As an attempt to increase the ownership of the project by the stakeholders, a number of participatory engagement methods were incorporated into the preparation phase of this project. In this way, all potential risks and setbacks associated with the participation and engagement of the stakeholders were identified and mitigation measures were designed accordingly. The first and most useful tool for this was the official meetings where all relevant stakeholders gathered together and conveyed their opinions, which was reflected in the project documents including the Stakeholder Engagement Plan. The second participatory engagement tool adopted in this project is survey studies with the NGOs. In order to compensate for the lack of representation of some sectoral associations and NGOs in the official meetings, the survey studies were utilized to incorporate their needs and opinions into the project design. The official meetings, phone calls and interviews held during the site visits enabled beneficiary dialogues with the sectoral associations and NGOs.

An overall communication strategy will be prepared under the sixth sub-component of the project. This strategy will determine the channels and frequency of communication with all project stakeholders. In addition, all developments related to the project will be shared with the public on a daily basis through the web portal and social media accounts to be created for the project.

MoIT will prepare presentations about the project and share them with the stakeholders through online meetings. During the online meetings, the participants will be able to share their opinions and raise their ask questions. Following the meetings, the presentations and minutes of the meetings will be shared with the stakeholders and they will receive feedbacks for their suggestions and questions via e-mail.

MoIT will start to organize face-to-face meetings with the stakeholders.

- **Official meetings**: The official meetings will be convened at two levels: (i) among the representatives of MoIT, and (ii) with relevant stakeholders. Firstly, the representatives of different units of the MoIT will meet monthly during both the preparation and implementation phase of the Project in order to keep each expert assigned to this Project informed about every aspects/milestones of the project. Also, the Project Implementation Unit will meet weekly to ensure smooth implementation. Secondly, official meetings were/will be conveyed with various stakeholders both during preparation and implementation phase of the Project. A large variety of the stakeholders including representatives of government authorities, NGOs, sectoral associations, TUBİTAK, KOSGEB, TSE and international organizations. Most of these meetings will be executed through digital platforms.
- **Kick-off and Closing Meetings:** Both at the beginning and end of the project lifecycle, multi-stakeholder meetings will be organized in order to announce and disseminate project activities and outcomes.

- **Disclosure Meetings:** Disclosure meetings will be convened with stakeholders including MoIT, NGOs, sectoral associations, government authorities such as MoENR, MoUECC, MoT, KOSGEB, TÜBİTAK and TSE. In these meetings project documents including the SEP, ESMF, LMP and other relevant implementation documents will be disclosed. Most of these meetings will be executed in digital platforms to progress in advance. Feedback regarding the disclosed documents will be collected through official correspondences, online feedback forms, e-mails to support the effectiveness of the digital meetings.
- **Digital Communication Tools:** The website and social media accounts of the MoIT will be used to inform stakeholders about the important developments of the Project. The press releases will also be shared with the press. These tools will be effectively used in order to lessen the need of face to face meetings.
- **Grievance Mechanism:** Per the World Bank's ESS10 requirement, a proper grievance mechanism (GM) will be established and operated for the Project. This is explained in detail in Section 7 of this document. For this mechanism to function in a proper and timely manner, a GM focal point who will oversee the entire process will be assigned as a part of the project team of the MoIT. S/he will also be responsible for reporting the grievance redress process of the project for monitoring purposes. This person will also be responsible to coordinate the grievance mechanism to ensure its smooth functioning within the scope of the project. A Communication Specialist will be assigned for this project in the MoIT to coordinate SEP activities and the inquiries regarding the reimbursable grants' projects. S/he will be the focal point for communication in the Project.

5.2. Overview of Stakeholder Engagement Program

The Table 5 below presents roles and responsibilities of key actors in stakeholder engagement to be conducted under the project.

Table 5. Roles and Responsibilities for the Stakeholder Engagement Program

Stakeholder	Project Phase	Communication Channels and Materials	Purpose	Venue	Frequency	Responsible Party
Industrial Enterprises	Planning Preparation Implementation Post-Implementation	• Official Meetings • Survey studies • Beneficiary Dialogues • Opening and closing meetings • Disclosure meetings • Digital platforms	• Reaching every potential beneficiary • Keeping informed about all important deadlines, technical capacity building activities • Receiving feedbacks	• Local Meetings • Digital platforms	As needed	MoIT
NGOs	Planning Preparation Implementation Post-Implementation	• Official Meetings • Survey studies • Beneficiary Dialogues • Opening and closing meetings • Disclosure meetings • Digital platforms	• Reaching every potential beneficiary • Keeping informed about all important deadlines, technical capacity building activities • Receiving feedbacks	• Local Meetings • Digital platforms	Monthly	MoIT
Universities and Research Centers	Implementation Post-Implementation	• Official Meetings • Survey studies • Beneficiary Dialogues • Opening and closing meetings • Disclosure meetings • Digital platforms	• Reaching every potential beneficiary • Keeping informed about all important deadlines, technical capacity building activities • Receiving feedbacks	• Local Meetings • Digital platforms	As needed	MoIT
Sectoral Associations	Planning Preparation Implementation Post-Implementation	• Official Meetings • Survey studies • Beneficiary Dialogues • Opening and closing meetings • Disclosure meetings • Digital platforms	• Reaching every potential beneficiary • Keeping informed about all important deadlines, technical capacity building activities • Receiving feedbacks	• Local Meetings • Digital platforms	Monthly	MoIT
Strategy and Budget Office of Presidency	Preparation Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT

		• Digital communication tools				
MoENR	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
MoTF	Implementation Post-Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
MoEUCC	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
MoT	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
MYK	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
TURKAK	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT

		• Digital communication tools				
Conformity Assessment Bodies	Implementation	• Official meetings • Opening and closing meetings • Disclosure meetings • Digital communication tools	• Keeping stakeholders informed • Providing regular updates • Collecting feedbacks, etc.	• MoIT Office • Digital Platforms	As needed	MoIT
Media	Implementation	• Press releases • Audiovisual stories • Project websites • Social Media Channels developed for the Project • TV/Radio • Project e-mail address • Press conferences • Digital communication tools	• To reach our every potential beneficiary • To keep the stakeholders informed • To provide regular updates about the Project	• Digital platforms	As needed (Media and other stakeholders will be informed upon milestones of the project)	MoIT

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1. Elaboration of Stakeholder Engagement Responsibilities

This section outlines the key implementation arrangements for the project's stakeholder engagement.

The MoIT PIU will assume the main responsibility for the coordination, implementation and monitoring and reporting of the SEP's implementation. Table 6 presents the roles and responsibilities of each party for the implementation of the SEP.

Table 6. Responsibilities of Key Actors/Stakeholders in SEP Implementation

Stakeholder	Responsibilities
MoIT PIU-Project Manager	- Incorporating all stakeholder engagement activities into the overall environmental and social management systems - Developing an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members - Expediting, monitoring, following up PIU team for proper implementation of processes related to grievance mechanism and stakeholder engagement issues - Coordinating with parties for proper implementation of processes related to grievance mechanism and stakeholder engagement issues - Consultation on specific SEP activities
MoIT PIU-Communication Specialist	- Planning and implementation of the SEP - Ensuring that the stakeholder engagement is understood by PIUs and other stakeholders - Leading stakeholder engagement activities with identified stakeholders - Organizing/managing Public Participation Meetings and other events related to public disclosure of information - Supporting other PIU staff that may interact with stakeholders - Coordinating interface and reporting to/from World Bank in relation to implementation of SEP - Updating the SEP periodically and upon major Project changes - Information sharing with local community members/ Local community representatives - Prepare and implement subproject level SEPs - Consult and engage poor and vulnerable groups such as women
MoIT PIU- Environmental and Social Specialist	- Monitoring the project progress - Ensuring the successful delivery of all defined documentation - Consolidated reporting on overall SEP activities and the project progress - Implementing social and environmental monitoring - Monitoring and reporting to MoIT PIU and management whether the social and environmental issues stated in related documents are implemented throughout Project lifetime
MoIT PIU-GM Focal Point	Acting as the focal point for the GM in MoIT PIU

	• Recording and following up grievances related with the Project • Management and coordination on resolution of grievances within the Project • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with actions • Coordinating and monitoring GM focal points in sectoral associations, NGOs and contractor level • Consolidating Project related grievances from all different GM levels • Informing MoIT PIU and management about the resolution process • Preparing consolidated GM reports of the Project
Governmental Bodies (MoENR, MoUECC, TUBITAK, KOSGEB, etc.)	• Providing inputs and feedback during the preparation and implementation phases of the SEP • Participation to the implementation of some activities in the SEP
Sectoral Associations, NGOs and CABs	• Providing inputs and feedback during the preparation and implementation phases of the SEP. • Participation to the implementation of some activities in the SEP
Supervision Consultant	• Monitoring the contractors' recording and resolution of grievances, and reporting these to PIU in their monthly progress reports • Contacting with PIU GM Focal Point for the follow up of the grievances

6.2. Information Disclosure

The MoIT PIU will create a web portal and social media accounts for the Project, in addition to printed leaflets in Turkish and English. All future project related reports and the Project Operations Manual will be disclosed on these channels. Project updates will also be posted on these. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/flyers will be posted on the website. As per the ESF requirements, the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility). Details about the Project Grievance Redress Mechanism will be posted on the website, as well as contact details of the project team and focal points. The PIU will update and maintain the website regularly (at least once on a monthly basis).

6.3. Estimated Budget

The estimated budget allocated for implementing the stakeholder engagement plan over five years is approximately 2.200.000 USD. The costs associated with the implementation of SEP-related activities (meetings, digital communication activities, etc.) will be covered under the budgets allocated by MoIT. Tentative cost of all activities for implementation can be seen at table below. The detail cost estimates to

carry out the SEP will be determined after the project support and the SEP and the budget table will be updated accordingly.

Table 7. Estimated Budget for Implementation of SEP

ACTIVITY	ESTIMATED BUDGET ($)
Organization of Kick-off Meeting	250.000
Organization of Periodic Meetings with Stakeholders	450.000
Preparation of the Communication Strategy	200.000
Design and Setting Up of Project Web Portal	200.000
Management of Social Media Accounts of Project	300.000
Printing and Distribution of Project Outputs	700.000
Organization of the Closing Meeting	350.000
TOTAL	**2.450.000**

7. GRIEVANCE MECHANISM

7.1. Purpose and Scope

The project-based GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project affected stakeholders, and
- Provide channels for the stakeholders to provide feedback and raise concerns.

Having an effective GM in place will also serve the objectives of: reducing conflicts and risks such as external interference, corruption or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

7.2. GM Overview and Structure

Any grievances that may occur during the project will be addressed at four levels. The GM at the first level will be undertaken by the project partners (component owners: KOSGEB, TUBITAK, MoIT). Secondly, contractors will establish their own GM for undertaking grievances from the parties they collaborate with. As the third level the MoIT's GM -as responsible for overall management- will be effectively adapted for the Project. Finally, the Presidential Communication Center (CIMER) will constitute the fourth level of the grievance mechanism of this project.

The GM will be accessible to a broad range of Project stakeholders who are likely to be affected directly or indirectly by the project. The GM that will be established in this project can be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project, as well as issues pertaining to sub-projects that are being financed and supported by the Project, including:

- Mismanagement, misuse of Project reimbursable grants s or corrupt practices,
- Violation of Project policies, guidelines, or procedures, including those related to child labor, health and safety of community/contract workers, sexual exploitation and abuse (SEA) and sexual harassment (SH), and environmental issues
- Grievances that may arise from stakeholders and other interested parties who are dissatisfied with the implementation of the project activities or actual implementation of the Project, and
- General feedback, questions, suggestions, compliments.

GM levels that are incorporated in the project are as follows:

7.2.1. GM at Project Partners

Project Implementation Units (PIUs) of project partners will be responsible for overall management and supervision of the project's related component including compliance with their SEP requirements as well as managing grievances. For this purpose, there are "Request and Complaint Boxes" in various parts in buildings. Additionally, requests, grievances and suggestions can be received by through paper-based petitions. Any request, suggestion or grievances can be sent to the related institutions via 'Send Message' and 'Communication' sections of their websites. Furthermore, any personnel may share his/her request, suggestion or grievance to senior management levels.

Each of the partners that receive WB reimbursable grants s within the scope of this project will be obliged to assign a focal point responsible for receiving and resolving the grievances. The Focal point of partners will monitor and track the GM as well as informing and reporting to the MoIT.

7.2.2. GM at Contractor Level

PIU will require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of works. The workers' grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances and to resolve cases;
- a register sheet to record and track the timely resolution of grievances; and
- a responsible department to receive, record, address and track resolution of grievances.

The process will be monitored by GM Focal Point in MoIT.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances;
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially;
- Anonymous grievances will be treated equally as other grievances, whose origin is known; and
- Management will treat grievances seriously and take timely and appropriate action in response.

The workers will be informed about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. The process will be monitored by GM Focal Point in MoIT.

Handling SEA/SH issues: Although the risk from project activities and in Turkish context is low, grievance mechanism for workers shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway will be established and updated in line with existing procedures of the country. The GM that will be in place for the project workers will also be used for addressing SEA/SH-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GM will also have in place processes to immediately notify both the MoIT and the World Bank of any SEA/SH complaints, with the consent of the survivor. Thus, the existing GM will also be strengthened with procedures to handle allegations of SEA/SH violations.

7.2.3. GM at MoIT

This section explains appeal mechanism for GM. MoIT receive formal requests and grievances through the Presidential Communication Center (CIMER). Other than CIMER, MoIT can receive formal grievances either as official petitions or through its online web channels. In accordance with the requirements of the World Bank, an expert will be assigned to function as the GM focal point of the project, who will receive grievances regarding the project through all available GMs. The GM will also allow submission of anonymous grievances through CIMER.

Additionally, requests, grievances and suggestions can be sent to Department of Personnel (for MoIT) either inner writing system or paper-based petitions for project workers, who are staff of MoIT. Requests, grievances and suggestions received in this way are evaluated in every 20 business days. The evaluation results are listed internally on the grievance system and can be accessed by employees through their own intranet. The grievances which are relevant to this Project, received through this system will also be reported to GM focal point.

7.2.4. GM at National Level

According to **Law on the Right to Information** *(Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days.")*, every requests and grievances regarding the public institutions are received through the Presidential Communication Center (CIMER). Requests via this channel are managed via CIMER responsible contacts in public bodies. MoIT also has CIMER responsible personnel who receive and assign the grievance to the interested parties in MoIT, who also tracks the progress and provides assistance in closing out of a grievance.

The CIMER mechanism of the MoIT will be available to the owners of grievance in this project. If any grievance is received regarding the project or sub-projects, the CIMER responsible of MoIT will convey it to the GM point of the project.

7.3. GM Communication and Process

Information about the project's GM will be publicized as part of the initial feedback consultations in the participating stakeholders. Information about the GM will also be posted online on the MoIT's website in Turkish. While communication language is expected to be Turkish for most of the stakeholders directly affected by the Project, attention should be given to ensuring coordination between workers means to address any language differences.

Details regarding the GM will be updated in Project Operational Manual (POM) and in this SEP, before project effectiveness.

7.4. Assessment and Closing Procedure

Receiving and registering of grievances within this Project have been detailed in Section 7.2. "GM Overview and Structure" with explanations on different GM levels, responsible parties and processes. However, common assessment procedures for all GM levels during this Project are detailed below:

- All grievances are reviewed to be classified whether they are related to Project activities or not. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact relevant party.
- All grievances received through direct phone calls, e-mails and face to-face meetings/communications are taken under registration and GM focal points in different GM levels get contact with the Complainant within ten (10) Business Days following registration in order to explain the Project's response process to grievance.

- PIUs in MoIT have fifteen (15) business days to investigate and respond the complainants. If the case requires a more complex investigation, updated information is provided to the complainant explaining the actions required to resolve grievance and the likely the timeline, upon consent of MoIT PIU.
- In order to resolve the grievance, any necessary corrective actions shall be applied to satisfy the complainant in compliance with related regulations that the complaint receiver is dependent on.
- All parties shall get an agreement on the corrective actions during solution process.
- PIU aims to solve each complaint within thirty (30) business days after response, and this period is subject to extend upon consent of head of related department in MoIT.
- When the complainants are not satisfied with the decision of dealing party on their complaints, they may apply to court as it is stated in Section 7.3. Appeal Mechanism.
- Proof documents of the corrective actions taken (photos from the site in subject or other evidence documents) are collected and a "grievance closure protocol" is signed by PIU or other related complaint handler and the complainant.

7.5. Monitoring and Reporting on Grievances

Monitoring and reporting on grievances will be held by GM focal points. GM focal points in different GM levels other than MoIT will be responsible to report to PIU's GM focal point about grievances quarterly.

The PIU's GM focal point will be responsible for:

- Collecting and analyzing the qualitative data from grievance redress focal points on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GM mechanisms to the the PIU.

The reports to be submitted by the PIU shall include a section related to GM which provides updated information on the following:

- Status of GM implementation
- Qualitative data on number of received grievances (including applications, suggestions, complaints, requests, positive feedback), number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved; and
- Any correction measures taken.

7.6. World Bank Grievance Redress System

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

8. MONITORING AND REPORTING

Stakeholder Engagement Plan activities will be monitored periodically and reported in project progress reports biannually. Monitoring and reporting will be executed by a monitoring specialist who will be in close collaboration with the Communications and Stakeholder Specialist and GM focal point in the PIU. Sub-Component 1 will support monitoring and evaluation (M&E) activities to track, document, and communicate the progress and results of the project, including monitoring of the Stakeholder Engagement Plan. An M&E team within the MoIT PIU will be responsible for overall compilation of progress and results. The PIU will also monitor the quality of the community mobilization and other inclusion activities which will be discussed and verified along with financial records and project implementation records. Feedback and grievances received through the grievance redress/beneficiary feedback mechanism will also be included in the reporting. Finally, the findings of the baseline and end line beneficiary perception surveys will also be included in M&E efforts.

Minutes of the meetings held within the scope of the Stakeholder Engagement Program, participant lists, significant comments and feedbacks of projects stakeholders regarding the project, number of grievances and their status (opened, closed, pending, etc.) will be shared as appendices of the project progress reports. Also, the reports on formal requests and grievances on the project and the ways they are addressed will be prepared as part of the grievance redress monitoring process that is described in Section 7. The PIU's GM focal point will be responsible from monitoring and reporting the grievances. GM focal point will report about number and status of the grievances monthly to the monitoring specialist in the PIU.

Throughout the Project life, MoIT will proceed communicating with relevant stakeholders as identified in Stakeholder Engagement Program. Any additional stakeholders identified during the life of the Project will also be added to the stakeholder lists and communication with them will be initiated accordingly. Improvements, upgrades and all environmental and social issues will be communicated via the methods outlined in Section 5 of this SEP. Besides, in case of significant changes or updates regarding the project stakeholders will be informed via appropriate methods. The SEP will be updated periodically and upon major project changes. SEP updates will provide brief summaries of issues, concerns and questions raised during the previous report period, as well as information on any changes between planned activities and the activities and events actually held.

ANNEX 1. Sample Grievance Register Form and Grievance Closeout Form

GRIEVANCE REGISTER FORM			
Name of person receiving grievance:			Date:
Title:			
INFORMATION ABOUT COMPLAINANT		**Ways of Receiving Grievance**	
(This section may not be filled if the complainant wishes to remain anonymous)			
Name – Surname		Phone	□
Phone number		Information Meetings	□
Address		Application to Office	□
District/Neighborhood		Mail/e-mail	□
Signature (if possible)		Field visit	□
		Other: ………………………………..	□
DETAILS OF GRIEVANCE			

GRIEVANCE CLOSEOUT FORM		
ASSESSMENT OF THE GRIEVANCE		

Corrective Action Required:	□ YES	□ NO
	Please describe the action if it is required to close-out the case	

RESULT

CLOSEOUT
This part will be filled in and signed by the complainant and the complaint evaluation committee when the corrective action or file is closed-out. (Instead of taking the signature of the complainant, receipt or other supplementary documents can be attached to the form in order to verify that the file has been closed-out.)

Responsible Person	**Complainant**
Name-Surname	Name-Surname
Date and Signature	Date and Signature (If possible. Reasons of non-signing should be explained)

ANNEX 2. Summary of Key Comments from Stakeholders Received During Project Preparation

No.	Institution	Comments
1	MoEUCC	Although there are approximately 700 enterprises that will be covered by CBAM at the first stage, there is a need for a green transformation strategy that will include all sectors of the industry in Türkiye. Therefore, investments in green technologies, circular economy requirements that can reveal the resource efficiency potential in all sub-sectors of the manufacturing industry, especially in SMEs, can quickly adapt to the EU green deal and EU Acquis.
2	MoENR	One of the most important factors that will accelerate the green transformation in the industry is renewable energy investments. This project will play an important catalyst role in accelerating investments in renewable energy, especially solar energy.
3	MoT	With the "Ecodesign for Sustainable Products Regulation" that will be implemented in the European Union countries in the near future, the importance of sustainable products will increase even more. With this project, industrial enterprises will need to prepare for this new period and technical trade system used by industry will be adapted to green economy.
4	TSE	TSE is ready to provide all necessary support to the project in establishing the necessary legislation and standard infrastructure for the certification of companies entering the green transformation process. The measurement of green transformation in industry is set to assess developments during project.
5	MYK	In order to accelerate the green transformation process in the industry, there is a need for trained and certified experts in this field. MYK would like to cooperate in the project for the establishment of professional standards in the field of green transformation in the scope of training, certification process.
6	Sectoral Associations (TÇÜD, TürkÇimento, TALSAD)	With CBAM, production processes need to be radically rethought. At this point, we will closely monitor the green transformation efforts with all our members in order to identify technology needs and focus investments in this area.
7	NGOs (REC Türkiye, SKD)	With the increasing awareness in the field of environment, we want to be in close cooperation with industrial enterprises and ministries. It will be useful to transfer our sectoral experience in the field to this project.

8	Universities (Hacettepe Univ., ASBÜ, TOBB ETÜ)	We believe that green transformation is an interdisciplinary process and all the activities designed in the project, from ensuring compliance with the legislation, to capacity building, from the green monitoring system to the training of green transformation experts, will be very effective. We hope to contribute to the development of curriculum and training content, especially for the Green Industry Academy.
9	CABs and TURKAK	EU Acquis in Green Economy will require conformity assessment bodies /notified bodies to prove green products in the scope of energy efficiency, circular economy, green energy, resource efficiency so that processes will be certificated all process. CABs will be most important stakeholders.
10	Chambers of Industry (İSO, ASO)	It is very satisfying to design the project in such a period when industrial enterprises need green transformation the most. Chambers of industry are the most accurate interfaces for reaching companies and determining their needs. Therefore, we would like to contribute at every stage of the Green Industry Project.