

**Small and Medium Enterprises Development
Organization of Türkiye**



**Post-Earthquake MSME
Recovery Project**

(The World Bank Project ID - P181068)

**Stakeholder
Engagement Plan**

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Definitions and Abbreviations

i. Abbreviations

CIMER	Presidency's Communication Center
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GN	Guidance Note
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IPF	Investment Project Financing
KOSGEB	Small and Medium Enterprises Development Organization of Türkiye
MoIT	Ministry of Industry and Technology
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MSME	Micro, Small and Medium Enterprises
NGO	Non-Governmental Organizations
PAP	Project Affected Person
PDO	Project Development Objective
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan

ii. Definitions

Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Consultation	The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
Disadvantaged or Vulnerable Groups	Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon which they depend.
Grievance Mechanism	A grievance mechanism is a formal complaint process that can be used by individuals, workers, communities and/or civil society organisations that are being negatively affected by certain business activities and operations.
Project Affected Person (PAP)	Project Affected Person is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholders	Refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may have an interest in the project (other interested parties).
Stakeholder Engagement	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. 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, and reporting to stakeholders and management functions.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
The Project	Refers to Post-Earthquake MSME Recovery Project.

1 Introduction

One of the mandatory documents to be prepared for the Post-Earthquake MSME Recovery Project (hereinafter referred to as “the Project”) is the Stakeholder Engagement Plan (SEP). The SEP for the Project has been prepared in accordance with the relevant national legislation, the Environmental and Social Standard (ESS) 1 and 10 of the World Bank Environmental and Social Framework (ESF) and the relevant Good International Industry Practice (GIIP).

1.1 Project Description

On February 6, 2023, two very large earthquakes of magnitude 7.8 and 7.5 occurred nine hours apart on different fault lines in the southern region of Türkiye and northern Syria. These are referred to as the “Kahramanmaraş earthquakes”. More than 11,000 aftershocks, including eight over magnitude 5.53 have occurred. Aftershocks are expected to continue for several months, with a decreasing frequency. These aftershocks could cause additional damage, especially in already weakened or damaged structures. A magnitude 6.3 earthquake on February 20, 2023, centered on Hatay area, is reported to have caused further damage.

The earthquakes have resulted in widespread damage across 11 provinces (see Figure 1), where around 14.01 million (16.5 percent) of Türkiye’s population live, including Adana, Adıyaman, Diyarbakır, Elazığ, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye and Şanlıurfa. As of 2021, there are 3.8 million employed persons in the disaster region which includes 11 provinces; the share of the regional employment in national employment is 13.3%. 2.3 million people are in formal, and 1.5 million people are in informal employment. Informal employment across the disaster region is around 39%. The labor participation rate in the region is 70.3% for men and 32.8% for women. The employment rate is 62.8% for men and 28% for women. The unemployment rate in the region is 10.7% for men and 14.7% for women.



Figure 1 The Region Affected by the Earthquake

The Project Development Objective (PDO) is to support the recovery and business continuity of MSMEs in earthquake affected areas. The Project will provide liquidity support in the form of reimbursable financing to eligible MSMEs affected by the severe earthquake as an extraordinary and temporary relief measure to MSMEs that are deemed financially viable before being hit by the earthquake.

Rapid disbursement is critical to ensure support can be utilized quickly by earthquake victims. The Project will aim to avert the closure of otherwise viable MSMEs and keep workers in MSMEs employed. KOSGEB will be a direct Borrower and implementing agency of the Project.

This support is basically open for all sectors, and more specifically:

- B - Mining and quarrying
- C - Manufacturing
- D - Electricity, gas, steam, and air conditioning supply
- E - Water supply; sewerage; waste management and remediation activities
- F - Construction
- G - Wholesale and retail trade; repair of motor vehicles and motorcycles
- H - Transporting and storage
- I - Accommodation and food service activities
- J - Information and communication
- K - Financial and insurance activities
- M - Professional, scientific, and technical activities
- N - Administrative and support service activities
- P - Education
- R - Arts, entertainment, and recreation
- S - Other services activities

MSMEs will be the main beneficiaries of the overall project through life-saving liquidity support. Reimbursable financing of different amounts proportional to the firm size (in terms of employment) and level of impact will be made available to eligible MSMEs. The specific eligible reimbursable financing amounts are different based on the firm size and the level of negative impacts. The support will be “performance-based” since beneficiary firms that receive the reimbursable financing will commit to remain open for at least 6 months after reopening their businesses. The firms shall be utilized for eligible operating expenses, such as employee salaries, supplies (including services), rent, and utilities. Hence there will be no procurement of goods, works, non-consulting services and consulting services.

Brief information about KOSGEB which has the sole responsibility for the Project is given below.

About KOSGEB

KOSGEB is a public institution affiliated with the MoIT, with legal authority, a special budget listed in list II/b of the Public Financial Management and Control Law No. 5018, and is subject to private law provisions in all of its transactions. The institution was established on 20/4/1990 by Law No. 3624 in order to increase the share and efficiency of small and medium-sized enterprises in meeting the country's economic and social needs, to increase their competitiveness and level, and to realize industry integration in accordance with economic developments.

KOSGEB's administrative entities are the General Assembly, the Executive Committee, and the Presidency. The Presidency is KOSGEB's executive body, consisting of KOSGEB Directorates in the province organization and units in the central organization. With 88 KOSGEB Directorates in 81 provinces as of 2022, the Presidency provides comprehensive assistance and services to small and medium-sized firms across the country. Furthermore, KOSGEB Representative Offices have been formed within the framework of cooperation agreements with institutions/organizations to carry out information and guiding operations to guarantee that the target audience benefits more effectively from KOSGEB services and supports. As of 2022, there are 106 Representative Offices in operation.

KOSGEB currently carries out the Rapid Support for Micro and Small Enterprises Project (P174144) funded by World Bank as of April 23, 2021. Taking into consideration of devastating effects of Covid-19 pandemic over

micro and small enterprises; this project aims to relieve enterprises which are in prioritized strategic sectors by means of a rapid and simple liquidity based support program.

1.2 Purpose and Scope of the SEP

1.2.1 Purpose

The overall purpose of this SEP is to ensure that a consistent, comprehensive and coordinated approach is taken to stakeholder engagement and information disclosure throughout the Project. It is further intended to demonstrate the commitment of the KOSGEB to an 'international best practice' approach to engagement.

In line with current international best practice, this SEP aims to ensure that stakeholder engagement is conducted on the basis of timely, relevant, and accessible information. In this way, the SEP seeks to ensure that stakeholders are given sufficient opportunity to voice their opinions and concerns, and that these concerns influence project decisions. The main objectives of the development and implementation of the SEP for the Project are outlined below:

- Identify relevant stakeholders and categorize individuals or organizations that may be affected by the Project.
- Distribute accurate Project information in an open and transparent manner. Information should allow affected parties to develop an understanding of potential impacts, risks and benefits and an open and transparent approach is central to achieving this aim.
- Ensure early identification of issues that may pose risks to the Project or its stakeholders.
- Develop relationships of trust between the Project and stakeholders to contribute to proactive interactions and avoid where possible, unnecessary conflicts based on rumor and misinformation.
- Record and address public concerns, issues and suggestions to allow the rationale for Project decisions to be traced and understood.
- Identify the most effective tools, methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation.
- Manage stakeholders' expectations which may not be aligned with the realities of the Project. Ensuring that expectations are kept at realistic levels limits disappointments and frustrations of directly affected parties at later stages of Project implementation, and therefore mitigates the potential for conflict with stakeholders.
- Fulfil national and international requirements for consultation, including zero tolerance for threats, intimidation or attacks against stakeholder who raise concerns. Ensuring compliance can avoid potential Project delays based on procedural issues rather than substantive ones, and contribute to trustful relations with stakeholders.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

This SEP has been formulated to ensure that directly affected parties and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the transition and its impacts.

1.2.2 Scope

The SEP is a "living" document that will be regularly updated with the results of stakeholder engagement activities carried out by the Project. Similarly, as new stakeholders are identified, the list of stakeholders will also

be updated by KOSGEB. The Stakeholder Engagement Program will be adapted to the Project evolution and will reflect any significant change in the Project design or execution. When (i) more details become available on stakeholder preferred means of engagement; (ii) more resources are needed for implementing this SEP; (iii) responsibilities for implementation of this SEP change or are delegate; and (iv) new stakeholders are identified for the Project, this SEP needs to be updated.

KOSGEB will further update this SEP, prior to starting the Project. Any major changes to the project related activities and to its schedule will be duly reflected in the final SEP. In this context, stakeholder engagement activities will be defined building on knowledge of stakeholder engagement methods and results of previous engagement.

This SEP is supported by other Project-specific documents. Those of particular relevance to this document are as follows:

- Environmental and Social Commitment Plan (ESCP)
- Environmental and Social Management System (ESMS)

1.3 Stakeholder Engagement Principles of KOSGEB

KOSGEB understands that effective stakeholder engagement and public consultation is a cornerstone of successful Project development, and is committed to free, prior, and informed engagement with stakeholders throughout the Project lifecycle. The key principles guiding the KOSGEB's approach to stakeholder engagement on this Project are:

- To be open and transparent with stakeholders, engaging in an open process and providing meaningful information on relevant aspects.
- To be accountable and willing to accept responsibility as a corporate citizen and to account for impacts associated with the Project activities.
- To create and maintain safe platforms and channels for dialogue and exchange with and between stakeholders, including representatives from civil society and community defenders, union representatives, where positive benefits as well as negative impacts and challenges can be discussed. The project does not tolerate threats, intimidation, or attacks against stakeholders or media representatives who raise issues or concerns related to the project.
- To have a relationship with stakeholders that is based on trust and a mutual commitment to acting in good faith.
- To respect stakeholders' interests, opinions and aspirations.
- To be free of external manipulation, interference, coercion, discrimination, and intimidation.
- To work collaboratively and cooperatively with stakeholders to find solutions that meet common interests.
- To be responsive and to coherently respond in good time to stakeholders.
- To be pro-active and to act in anticipation of the need for information or potential issues, trying to manage risks before they occur by offering opportunities for dialogue.
- To engage with stakeholders such that they feel they are treated fairly and their issues and concerns are afforded fair consideration.
- To ensure access to adequate remedy for PAPs who have been negatively impacted by the project.
- To be inclusive and accessible to all stakeholders, including vulnerable and minority groups, so that they feel able to participate, to receive and understand information, and to be heard.
- To disclosure and disseminate relevant, transparent, objective, meaningful and easily accessible information in a timely manner and culturally appropriate format.

- To promote gender-responsive and diverse stakeholder engagement with a tailored approach by stakeholder.

Key SEP objectives and activities adopted by KOSGEB for the Project are given as follows:

SEP Objectives:

- Identify relevant stakeholders,
- Familiarize the stakeholders with the Project,
- Fulfil national and international requirements for consultation,
- Record and address stakeholder concerns, issues and suggestions.

SEP Activities:

- Develop and implement and regularly update SEP,
- Maintain regular engagement with stakeholders,
- Develop, disseminate and implement grievance management procedure,
- Maintaining ongoing relationship with Project workers and NGOs,
- Regular reporting to stakeholders.

1.4 Lessons Learned from the Previous Project

KOSGEB currently carries out the Rapid Support for Micro and Small Enterprises Project (P174144) funded by World Bank as of April 23, 2021. Therefore, KOSGEB has experience in complying with World Bank ESSs as working in a multi-stakeholder environment. The key lessons learned from this previous project are as follows:

- One of the most important lesson learned in the previous project is that attention should be adequately given to call center employees of KOSGEB. The first method used by the beneficiaries in the grievance mechanism has always been to call instantly KOSGEB call center. There have been a lot of received calls (including complaint, request, suggestion, etc.) with regards to the project's scope, application and implementation requirements. Instant calls were used by beneficiaries much more than any other grievance mechanism tools. Therefore, call center employees act as a barrier between beneficiaries and the Project. The information they convey and the questions they answer are of great importance for the Project. Potential omissions and inaccuracies from these information can adversely affect the Project. Therefore, more training (both awareness and refresher) should be given to KOSGEB call center employees by KOSGEB PIU within the scope of the Project (at least once every 3 months).
- The relevant stakeholders must be identified based on their responsibilities in 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 shall 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 KOSGEB 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.

2 Regulatory and Institutional Framework

The Project needs to comply with the World Bank's Environmental and Social Framework (ESF) comprising the Environmental and Social Standards as well as national legislation.

2.1 National Legislation

The national laws and regulations governing E&S risk mitigation will be duly applied to the Project in addition to the World Bank ESSs. The requirements of the Turkish laws and regulations with regards to stakeholder engagement and information disclosure will be implemented by including below:

a) Constitution of Republic of Türkiye (1982)

ARTICLE 10 - Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

ARTICLE 25 - Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their thoughts and opinions.

ARTICLE 26 - Everyone has the right to express and disseminate his/her thoughts and opinions individually or collectively by words, writings, pictures or other means. This freedom includes the freedom to exchange or receive news or ideas without the interference of public authorities.

ARTICLE 74 - Citizens and foreigners who are residing in Türkiye and subject to reciprocity, have the right to apply to the competent authorities and the Grand National Assembly of Türkiye in writing about their wishes and complaints about the public. The results of the applications related to them are notified to the petitioners in writing without delay. Everyone has the right to information and to apply to the ombudsman. The Institution of the Ombudsperson established under the Grand National Assembly of Türkiye examines complaints on the functioning of the administration.

b) Law No. 4982 - Law on the Right to Information, Official Gazette No. 25269 (24.10.2003)

Law on the Right to Information regulates the right to information process and its basis in accordance with the principles of equality, impartiality and openness, which is required by democratic and transparent administration. Everyone has the right to obtain information about the activities of public institutions and professional organizations.

According to the obligation to provide information (Article 5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly.

Article 11 of the law states that 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.

c) Law No. 3071 - The Law on Use of the Right to Petition, Official Gazette No. 18571 (10.11.1984)

The purpose of this Law is to regulate the use of the right of Turkish citizens and foreigners residing in Turkey to apply in writing to the Grand National Assembly of Türkiye and the competent authorities regarding their wishes and complaints regarding themselves or the public.

Based on Article 3 of the Law on Use of the Right to Petition, citizens of the Republic of Türkiye, may submit their complaints to the Grand National Assembly of Türkiye through written petition. Foreigners residing in Türkiye can benefit from this right, provided that reciprocity is observed and their petitions are written in Turkish.

d) The Environmental Impact Assessment Regulation, Official Gazette No. 31907 (29.07.2022)

Article 9 - Public consultation and participation meeting:

(1) In order to inform the public about the investment and to receive their opinions and suggestions regarding the project; With the participation of the institutions/organizations qualified by the Ministry and the project owner, a meeting to inform the public and participate in the process is held at a central place and time determined by the provincial directorate, where the relevant public, who is expected to be most affected by the project, can easily reach, on the date determined by the Ministry.

(2) Institutions/organizations that have been qualified by the Ministry shall publish an advertisement stating the date, time, place and subject of the meeting in a newspaper defined as a common periodical, together with the local periodical published in the region where the project will be carried out, at least 10 calendar days before the meeting date.

(3) The meeting of informing the public and participation in the process is held under the chairmanship of the provincial director or an official to be appointed. In the meeting, it is ensured that the public is informed about the project and their opinions, suggestions and questions are received. Opinions, suggestions and objections expressed by the public are stated in the minutes to be drawn up about the meeting. The meeting chair may ask the participants to give their opinions in writing. The meeting minutes are sent to the Ministry, one copy of which remains with the provincial directorate.

(4) Before determining the special format, the members of the commission can examine the area where the project is planned, and attend the public information and participation meeting to be held on the notified date.

(5) A stakeholder engagement plan (SEP) is prepared by the institutions/organizations authorized by the Ministry in order to inform the public about the project and its effects, and to receive the opinions and suggestions of the public regarding the project. The prepared stakeholder participation plan is presented in the annex of the EIA application file. In cases where it deems necessary, the Ministry may also request the authorized institutions/organizations to carry out additional studies such as distributing informative brochures, conducting surveys, seminars, or preparing a website related to the project and sharing information during the EIA process to inform the public. In addition, if requested by the Ministry, this plan is updated during the EIA process.

2.2 International Requirements

The World Bank Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification, evaluation and mitigation of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. These standards also set out the World Bank's commitment to sustainable development with the aim of ending poverty and promoting shared prosperity. ESS1 and ESS10 contain information about stakeholder engagement that should be implemented in the Project. KOSGEB is committed to full compliance with ESS1 and ESS10 as well as aligning to Good International Industry Practice (GIIB) for the Project's stakeholder engagement process.

a) ESS1 Assessment and Management of Environmental and Social Risks and Impacts

ESS1 sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the ESSs. ESS1 states that the environmental and social assessment will include stakeholder engagement as an integral part of the assessment.

b) ESS10 Stakeholder Engagement and Information Disclosure

ESS10 "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. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. ESS10 states that 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. As set out in ESS10, the Borrower will continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.

ESS10 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. 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).

c) Guidance Note-10: Stakeholder Engagement and Information Disclosure (First Edition, Published June 2018)

The Guidance Note (GN) provides guidance for the Borrower on the application of the Environmental and Social Standards. They help to explain the requirements of the ESSs of the World Bank. In case of any inconsistency or conflict between the GN-10 and the ESS10, the provisions of the ESS10 prevail.

The GN-10 states that the process of preparing the SEP is inclusive, and the draft SEP is designed to accommodate the needs and circumstances of different stakeholders, paying special attention to identified disadvantaged or vulnerable individuals or groups. It identifies the information and types of interaction to be conducted in each phase of the project, considers and addresses stakeholders' communication and physical accessibility challenges, and includes any other stakeholder engagement required by the other ESSs.

d) United Nations Universal Declaration of Human Rights

The Universal Declaration of Human Rights is a milestone document in the history of human rights. It sets out, for the first time, fundamental human rights to be universally protected and it has been translated into over 500 languages. The Declaration is widely recognized as having inspired, and paved the way for, the adoption of more than seventy human rights treaties, applied today on a permanent basis at global and regional levels (all containing references to it in their preambles).

3 Brief Summary of Previous Stakeholder Engagement Activities

Stakeholder consultations have been carried out as part of project preparation. For the scope of the SEP studies, the previous stakeholder engagement activities conducted by KOSGEB PIU for the draft SEP are given in Table 1 below.

Table 1 Previous Stakeholder Engagement Activities within the Scope of the Project

Location	Date	Participants	Key Points of Discussion
Online	17.04.2023	<ul style="list-style-type: none"> KOSGEB PIU KOSGEB provincial directorates in the provinces affected by the earthquake Gaziantep Chamber of Industry Union of Chambers and Commodity Exchanges (TOBB) Şanlıurfa Chamber of Commerce and Industry Adana Chamber of Industry Antakya Organized Industrial Zone Directorate Kahramanmaraş Chamber of Commerce and Industry 	<ul style="list-style-type: none"> Discussing the latest situation in 11 provinces affected by the earthquake Expectations from the Project Discussion on the Project scope and implementation Experiences and knowledge sharing in previous projects Discussion on the World Bank's support in technical assistance and projects

There was a great participation in the online meeting held on April 17th. At the end of the meeting, the following major issues were discussed:

- They suggested that the application process of the Project should not require a lot of time and effort. It was discussed that the simplicity of the application phase of the project would motivate enterprises.
- It was discussed that KOSGEB provincial directorates in 11 provinces affected by the earthquake should help each other and provide support to each other.
- It was discussed that support should be given to not only damaged businesses but also all undamaged businesses in 11 provinces affected by the earthquake.
- It was discussed that it would be very beneficial for enterprises to benefit from this World Bank support without creating a subproject. Developing a subproject would waste too much time for post-earthquake support. As this is a life-saving liquidity support, it is hoped that it will quickly reduce the effects of the earthquake.
- It was discussed that MSMEs that are not in the earthquake zone, but that do business with 11 provinces in the earthquake zone, should be supported. For instance, MSMEs in other provinces that are not in the earthquake zone may have a supply chain with 11 provinces in the earthquake zone. Therefore, these enterprises were also indirectly affected by the earthquake economically.
- It was discussed that having a clear definition of target beneficiaries and simple and flexible design would increase the efficiency of the project.

After the stakeholder engagement activities described above in Table 1, KOSGEB prepared the draft Stakeholder Engagement Plan (SEP). After the first draft of this document is approved, KOSGEB will virtually conduct a stakeholder engagement meeting with the stakeholders in order to present key aspects of the proposed Project.

4 Stakeholder Identification and Analysis

Stakeholder identification and analysis is an essential component of effective and meaningful stakeholder engagement activities. Stakeholders identified represent the organizations and individuals who may be directly or indirectly (positively or negatively) affected by the Project or who may have an effect on how the Project is implemented. Stakeholders identified for inclusion in engagement activities meet one of the following criteria:

- Have an interest in the Project;
- Would potentially be impacted by the Project or have an influence on the Project (negatively or positively); or
- Could provide commentary on issues and concerns related to the Project.

A key element of any SEP is effective identification of key stakeholders. It should be noted that stakeholder identification and analysis will continue throughout the development of the Project and the SEP will be updated accordingly.

Stakeholders are those who have an interest in a particular decision, either as individuals or representatives of a group including people who influence a decision or can influence it, as well as those affected by it. Stakeholders include Project affected people and other stakeholders including; non-governmental organizations, governments, institutions, shareholders and employees as well as non-affected community members.

ESS 10 recognizes two broad categories of stakeholders: i) Affected Parties and ii) Other Interested Parties. In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs. KOSGEB recognizes that meaningful and timely engagement with stakeholders can enable the success of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended national benefits.

4.1 Affected Parties and Other Interested Parties

Affected Parties 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 who are impacted or likely to be impacted directly or indirectly (actually or potentially), positively or adversely, by the Project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Other Interested Parties 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. These stakeholders may not experience direct impacts from the project, but consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.

The values, perceptions, concerns of the stakeholders, their power to direct, support or adversely affect the Project activities and services, the possibility of being affected by these activities and services and the degree of this impact and the level of interest of the stakeholder in the Project have been assessed at this stage. Table 2 below presents preliminary identified list of stakeholders including both affected parties and other interested parties based on the desktop study and the consultations.

Table 2 List of Stakeholders

Stakeholders	Affected Parties/ Other Interested Parties/ Disadvantaged & Vulnerable Individuals or Groups	Main Influence on or Interest in the Project	Significance Level	
			Interest	Influence
MSMEs and their employees	Affected Parties	Directly benefitting from the Project As remaining operational, employment will be preserved.	High	High
Citizens and communities settled in 11 provinces affected by the earthquake	Affected Parties	Successful implementation of the Project with visible and measurable results Could be impacted by the MSMEs' activities	Medium	High
MoEUCC	Other Interested Parties	Damage status information of MSMEs will be obtained from the ministry. Successful implementation of the Project with visible and measurable results	Low	Medium
MoIT	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Medium	Low
Turkish Industrial Development Bank (TSKB)	Other Interested Parties	Successful implementation of the Project	Low	Medium
Turkish Development and Investment Bank (TKYB)	Other Interested Parties	Successful implementation of the Project	Low	Medium
National Media	Other Interested Parties	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the national level	Medium	High
NGOs	Other Interested Parties	Successful implementation of the Project	Medium	Medium
Organized industrial zones in 11 provinces affected by the earthquake	Other Interested Parties	Successful implementation of the Project	Medium	Medium
Municipalities of the 11 provinces affected by the earthquake	Other Interested Parties	Municipalities are responsible for the management of domestic waste and wastewater emanated from MSMEs. Successful implementation of the Project with visible and measurable results	Medium	Medium
Türkiye Exporters Assembly	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Low
Social Security Institution	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Low

Stakeholders	Affected Parties/ Other Interested Parties/ Disadvantaged & Vulnerable Individuals or Groups	Main Influence on or Interest in the Project	Significance Level	
			Interest	Influence
Revenue Administration	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Low
TESK	Other Interested Parties	Confederation of Turkish Tradesmen and Craftsmen (TESK) is the member KOSGEB Executive Committee Successful implementation of the Project with visible and measurable results	Low	Medium
TOBB	Other Interested Parties	The Union of Chambers and Commodity Exchanges of Turkey (TOBB) is the member KOSGEB Executive Committee Successful implementation of the Project with visible and measurable results	Low	Medium
Chambers of Industry	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Medium
Chambers of Commerce	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Medium
Development Agencies	Other Interested Parties	Successful implementation of the Project with visible and measurable results	Low	Low
Disadvantaged & Vulnerable Individuals or Groups		Women-led or women-managed MSMEs	High	High

Significance Level (Interest and Influence) provides information about the level of participation, how to establish a relationship with the stakeholders, how they will be informed, and the continuity and level of the established communication, in line with the needs of the stakeholders, depending on their sensitivity related to their impact-interest level. According to Significance Level of the identified stakeholders, the conditions will be considered as follows:

		Level of Interest		
		Low	Medium	High
Level of Influence	High	Involve/Engage	Involve/Engage	Partner (Work Together)
	Medium	Inform	Consult	Consult
	Low	Inform	Inform	Consult

Any stakeholders that are not identified at this stage of the Project may directly contact KOSGEB PIU to make themselves and their needs known to facilitate the effective implementation of the SEP.

4.2 Disadvantaged & Vulnerable Individuals or Groups

Disadvantaged & Vulnerable Individuals or Groups are those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. The vulnerability may

stem from person's origin, gender, age, health condition, current economic constraints and financial insecurity, disadvantaged status in the community (e.g., minorities or marginal groups), dependence on other individuals or natural resources, etc.

It is important that particular effort be made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes.

To ensure that all Project affected stakeholders will have an opportunity to receive Project information, raise concerns or make written or oral comments, special provisions will be taken to consider disadvantaged & vulnerable groups in a meaningful way.

Disadvantaged and vulnerable group is considered as **women-led or women-managed MSMEs**. Since they face more obstacles in accessing finance in Türkiye given that financial institutions perceive them as higher risk. Their participation in the Türkiye's economy is still very limited. The Project will address existing gaps by introducing targets for disadvantaged and vulnerable group to become beneficiaries. The project will include specific gender targets to ensure women-led or women-managed MSMEs in the Project.

The SEP is a living document which will be updated in accordance with any clarification on the Project and therefore this section of the SEP will be updated accordingly.

4.3 Summary of Project Stakeholder Needs

The stakeholder engagement process will serve as a mechanism for understanding and managing stakeholder and community expectations, by disseminating accurate information in an easily understandable manner. It is important to ensure that the proposed Project does not create, or allow, unrealistic expectations to develop amongst stakeholders about potential Project benefits.

Through supporting open dialogue, engagement will help to establish and maintain a productive relationship between KOSGEB and stakeholders. This supported not only an effective implementation of the Project, but also will strengthen the future relationships between KOSGEB and stakeholders.

Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions.

KOSGEB will assign a designated expert within PIU for the management and monitoring of stakeholder activities including the monitoring of grievance-related actions taken.

5 Stakeholder Engagement Program

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the life of the Project. KOSGEB will be in active communication with the identified stakeholders throughout the life of the Project. In order to meet the best practice approaches, the Project will apply the following principles of stakeholder engagement:

- Openness and life-cycle approach: public consultations for the Project will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;

- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communication and build effective relationships.

5.1 Purpose and Timing of Stakeholder Engagement Program

Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It will involve interactions between identified groups of people and provide stakeholders with an opportunity to raise their concerns and opinions, and ensure that this information is taken into consideration when making project decisions.

The main purpose of the stakeholder engagement program is to ensure informed decisions regarding the Project. Continuous stakeholder engagement is a crucial element of all the stages of planning and implementation of the Project. In addition, the stakeholder engagement will also aim to establish contacts and foster dialogue across the diverse stakeholder group.

The Stakeholder Engagement Program, through an informed consultation and participation process, includes set of actions with targeted audience and responsibilities in order to ensure the maximum engagement level for all relevant stakeholders. The stakeholder engagement program is given in Table 3 below.

Table 3 Stakeholder Engagement Program

Project stage	Target Stakeholders	Topic of Engagement and Consultation	Method Proposed	Timetable: Location and Dates	Responsibility
Design & Preparation	Affected Parties & Other Interested Parties	Project-related E&S Documents: <ul style="list-style-type: none"> • SEP • ESMS • ESCP • E&S Policy 	KOSGEB Official Website	Before the effectiveness of the Project	KOSGEB PIU
Design & Preparation	Affected Parties & Other Interested Parties	<ul style="list-style-type: none"> • Project's Scope and Application/Implementation Process 	KOSGEB Official Website, Consultation meetings	Before the effectiveness of the Project	KOSGEB PIU
Design & Preparation	KOSGEB PIU and Call Center Employees	<ul style="list-style-type: none"> • Project's Scope and Application/Implementation Process • E&S Documents including GRM 	Training and Workshop	Before the effectiveness of the Project	Project Manager in KOSGEB PIU
Implementation	Beneficiary MSMEs	<ul style="list-style-type: none"> • Implementation of the Project with visible and measurable results • Actions to address the feedback 	Survey	Annually after the effectiveness of the Project	KOSGEB PIU

Project stage	Target Stakeholders	Topic of Engagement and Consultation	Method Proposed	Timetable: Location and Dates	Responsibility
Implementation	Disadvantaged & Vulnerable Individuals or Groups	<ul style="list-style-type: none"> Project's Scope and Application/Implementation Process E&S Documents including GRM 	KOSGEB Official Website, Targeted e-mail announcement, Frequently Asked Questions, Video Animation, Project Leaflet, Official Meeting	After the effectiveness of the Project	KOSGEB PIU
Implementation	Beneficiary MSMEs	<ul style="list-style-type: none"> Project's Scope and Application/Implementation Process E&S Documents including GRM 	KOSGEB Official Website, Public Announcements, Frequently Asked Questions	After the effectiveness of the Project	KOSGEB PIU
Implementation	Beneficiary MSMEs	Due diligence of MSMEs' E&S requirements	Site Visits	Periodically after the effectiveness of the Project	KOSGEB PIU
Implementation	World Bank	Regular E&S Monitoring	Report Format	Periodically after the effectiveness of the Project	KOSGEB PIU
Implementation	World Bank	Project implementation on progress with key indicators	Report Format	Periodically after the effectiveness of the Project	KOSGEB PIU
Implementation	National Media	Project's Scope and Application/Implementation Process (They will be the main medium for information dissemination to the public about the Project)	Press Releases and Newsletters, Digital Platforms (Social Media), Interviews	After the effectiveness of the Project	KOSGEB PIU
Closing	Beneficiary MSMEs	Functionality of the Project with visible and measurable results and outputs	Survey	After closing	KOSGEB PIU
Closing	World Bank	Functionality of the Project with visible and measurable results and outputs	Official meeting	After closing	KOSGEB PIU

At this stage of the Project, the stakeholder engagement program has been determined as given in Table 3. However, it can be updated in the light of new information in the further stages of the Project.

5.2 Proposed Strategy for Information Disclosure

An open, inclusive and transparent process of engagement and communication will be undertaken by KOSGEB to ensure that stakeholders are well informed about the proposed development. Information of the Project will be disclosed as early and as comprehensively as possible.

KOSGEB PIU, as part of the stakeholder engagement, will disclose following information and documentation regarding the Project as follows:

- Stakeholder Engagement Plan (SEP),
- Environmental and Social Management System (ESMS),

- Environmental and Social Commitment Plan (ESCP),
- Environmental and Social Policy of the KOSGEB,
- Project description and updates regarding the implementation progress of the Project,
- Summary of conclusions from the consultative meetings and public discussions held, and
- The Grievance Redress Mechanism (GRM) and its objectives.

The information packages will be available in Turkish and English and will be accessible through KOSGEB official website. Printed copies of SEP, ESMS, ESCP and the E&S Policy will be available in KOSGEB PIU Office. KOSGEB will disclose these documents to its own website. It is important to note that, these documents and information will remain in the public domain for the entire duration of the Project. The current KOSGEB website (<https://www.kosgeb.gov.tr/>) will be used to disclose project documents, including in both Turkish and English. All information brochures/fliers and animation will be posted on the website and KOSGEB official social media accounts. KOSGEB will update and maintain the website regularly (at least once a quarterly basis).

5.3 Proposed Strategy for Consultation

In compliance with national regulations and international standards, stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's E&S impacts. Similarly, in order to develop an effective SEP, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, and their priorities and objectives in relation to the Project. This information is then used to tailor engagement to each type of stakeholder.

The Project recognizes that it is neither practical nor necessary to engage with all stakeholder groups with the same level of frequency and/or intensity. Analyzing and prioritizing stakeholders is important to determine appropriate engagement methods according to a particular group's level of relevance to the Project as well as the need to actively engage at various Project stages.

Consultation strategy comprises four tasks, as described below.

- a) Facilitating access to information and knowledge
- b) Promoting participation
- c) Giving voice to the excluded
- d) Influencing public policies

The participation process for the Project is considerably inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable and disadvantaged groups.

5.4 Proposed Strategy to Incorporate the View of Vulnerable and Disadvantaged Groups

Attention will be paid to find approaches and means to ensure outreach and active engagement of particular vulnerable and disadvantaged groups. Engagement with the vulnerable and disadvantaged groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the Project so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

The engagement method should be tailored to each identified vulnerable and disadvantaged groups ensuring their involvement in the Project. KOSGEB will carry out targeted consultations with vulnerable and disadvantaged groups to understand concerns/needs in terms of accessing the Project. Some of the strategies that will be adopted to effectively engage and communicate to vulnerable and disadvantaged group will be as follows:

- Engagements will be carried out with regional organizations/institutions and NGOs representing the rights of women.
- The number of women-led or women-managed MSMEs that will benefit from the Project will have a minimum ratio among the Project beneficiaries. 10 percent of total reimbursable financing funds will be earmarked for women-led or women-managed MSMEs. The Project will provide an opportunity to address equity concerns.
- Regular and separate consultations will be conducted for disadvantaged and vulnerable group identified in section 4.2 of this SEP.
- Information on the Project will be provided face to face or by any other appropriate method specific to disadvantaged and vulnerable group.

Proposed strategies could be added in the later stages of the Project to incorporate the view of vulnerable and disadvantaged groups.

5.5 Timelines

Timely organization and execution of stakeholder engagement activities that will be conducted during the implementation of the Project will be critical in supporting the Project's risk and impact management process. This is especially the case during the early identification and management of potential adverse and positive impacts and risks which will allow for a cost-effective project design.

SEP includes a stakeholder engagement program that covers the entire life span of the project and presents the timing, frequency of engagement activities, communication tools/method to be used, target stakeholders and responsible parties for each project phase under *Table 3 Stakeholder Engagement Program*.

Once disclosed, this SEP will be operational and be implemented until the end of project life and will be revised and disclosed as necessary to serve any additional needs that may arise throughout the project.

The draft SEP will be disclosed before project appraisal stage and consulted upon with stakeholders. Their feedback will be taken into consideration during finalization of the SEP. The final SEP will be disclosed as well and updated, as needed, during Project implementation.

5.6 Review of Comments

This SEP is designed to establish an effective platform for productive interaction with the affected parties and other interested parties in the implementation outcome of the Project. Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities to:

- Ensure meaningful citizen engagement,
- Solicit feedback to inform project design, implementation, monitoring, and evaluation,
- Clarify project objectives, scope and manage expectation,
- Assess and mitigate project risks,
- Enhance project outcome and benefits,

- Disseminate project information and materials,
- Address project grievances.

Suggestions and comments received during consultations (both electronic and face-to-face), and received through website and social media accounts, will be reviewed, and to extent possible, and as appropriate, integrated in the SEP and project design and implementation. Complaints and suggestions received through the Grievance Mechanism will be addressed within the stipulated timeframe and the complaint or suggestion holder will be reported back.

5.7 Future Phases of Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the Stakeholder Engagement Plan and the grievance mechanism.

KOSGEB will update its official website regularly with key project updates and reports on the project's environmental and social performance. The website will also provide information about the grievance mechanism for the project. Visual material will be used in consultation meetings. Written information will be prepared by KOSGEB and disclosed to the public.

6 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

6.1 Resources

There are a variety of engagement techniques used to build relationships with stakeholders, gather information from stakeholders, consult with stakeholders, and disseminate project information to stakeholders. To achieve a consistent and effective stakeholder engagement program implementation, the tools outlined in Table 4 below will be key in all phases of the Project.

Table 4 Stakeholder Engagement Tools

Tool	Description
Face-to-Face Meetings	Face-to-face consultation meetings will be convened with stakeholders.
Correspondences (official letters, emails)	Distribute information to Government officials, NGOs, institutions, and organizations/agencies.
Frequently Asked Questions	KOSGEB will develop Frequently Asked Questions, and publish it on its website in order to help providing consistent responses during regular community and stakeholder engagement. The Frequently Asked Questions are key tool in helping manage community expectations.
Video Animation	Video animation explaining in an accessible manner the Project and its application process will be used. The aim of the animation is to ensure that beneficiaries understand the Project and its application process.
Specific Reporting to Stakeholders	KOSGEB will provide Project updates to different stakeholder groups at agreed timelines.

Tool	Description
Grievance Mechanism	KOSGEB will coordinate and maintain a stakeholder grievance database to record and track grievances as well as resolution status. KOSGEB will log grievances. Regular reports will be extracted from this database and communicated periodically to World Bank, as part of the Regular Monitoring Reports during the implementation of the Project.
KOSGEB Website	KOSGEB will update its website with relevant project information in Turkish and English language as a minimum. SEP will be made available on the website. KOSGEB's official website will be used to provide updates and information related to the Project.
KOSGEB's Corporate SME Information System	KOSGEB's Corporate SME Information System (KBS) will be used by KOSGEB PIU for implementation of the Project.
Public Announcements	As appropriate relevant Project information will be provided to public media. The use of social media for communication to stakeholders will be explored.
Site Visits	Site visits to proposed Project activities by beneficiaries.
Surveys	Gather opinions and views from individual stakeholders examining beneficiary experience and feedback about project activities. KOSGEB will carry out annual beneficiary surveys which will be gender disaggregated. The results of the surveys will be shared during stakeholder engagement activities, and actions to address the feedback will be included in the project implementation activities ("closing the feedback loop").
Workshops / Virtual Seminar	Present project information to a group of stakeholders. Allow stakeholders to provide opinions and views. Use participatory exercises to facilitate discussions, brainstorm issues, analyze information and develop recommendations and strategies.
Project Leaflet	Brief project information to provide regular update.
Training	The Project training will be organized for KOSGEB PIU and KOSGEB call center employees in order to increase their knowledge regarding the Project.
Press Releases and Newsletters, Interview	The press releases, newsletters and interviews will be shared with the press to inform the general public about the Project.
Regular Monitoring Reports	Regular Monitoring Reports will be disclosed in KOSGEB Official Website.
Project-related Documents (SEP, ESMS, ESCP, etc.)	Project-related Documents will be disclosed in KOSGEB Official Website.

KOSGEB will develop disclosure materials that are clear, consistent and provided in a timely manner to the stakeholders. All the communication materials will be developed in English and Turkish languages. Prior to any disclosure, KOSGEB will conduct pre-disclosure planning to define a process for information disclosure that ensures that all key groups within communities of interest are given the opportunity to receive and comment on Project information.

There is a tentative budget allocated for the implementation of SEP. The estimated costs associated with the implementation of SEP-related activities (human resources, meetings, digital communication activities, etc.) will be covered in below Table 5.

Table 5 Budget for Operational Expenditures of SEP

Budget Categories	Estimated Total Cost (USD)	Remarks / Resource
Staff salaries and related expenses	54,000	World Bank financed Project Budget Employment of 1 E&S Consultant in KOSGEB Project Implementation Unit
Equipment	10,000	World Bank financed Project Budget Equipment for personnel who will be dealing stakeholder activities (computers, printers, PIU office stationery consumables)
Consultation Meetings	0	World Bank financed Project Budget All consultations will be conducted online. However, if there is no internet network in the areas affected by the earthquake, face-to-face meetings will be held through our provincial directorates. This budget will be updated later and will include costs such as location hiring, technical services, catering, etc.
Site visits	7,500	World Bank financed Project Budget Travel costs for KOSGEB PIU for E&S due diligence and consultation
Communication campaigns	2000	World Bank financed Project Budget
Trainings	30,000	World Bank financed Project Budget Training expenses for KOSGEB PIU and KOSGEB civil servants in 11 directorates. Cost includes training material, trainer, meeting room and travel.
Beneficiary surveys	5,000	World Bank financed Project Budget
Other contingency expenses	5,000	World Bank financed Project Budget

Budget planning at this stage of the Project includes only desk-based estimates. In the later stages of the Project, it will be updated in the light of new information. The budget will clearly lay out costs related to all stakeholder engagement activities, broken down by quantity, unit costs and number of times the expense will be incurred.

6.2 Management Functions and Responsibilities

KOSGEB will be a direct Borrower and carry out the Project which is the content of this SEP. KOSGEB has the required experience and is in charge of implementing the stakeholder engagement activities.

KOSGEB will establish a Project Implementation Unit (PIU) for the purposes of implementing the project and will maintain it throughout Project implementation. The PIU will be fully funded and staffed and will operate under the overall supervision of the KOSGEB management team, in cooperation with relevant units/departments/directorates in the 11 affected provinces.

KOSGEB will be responsible to ensure stakeholder engagement and grievance management throughout the Project lifetime. KOSGEB PIU will be in charge of the following activities:

- Constantly coordinate on all aspects related to the implementation of this SEP according to ESS1 and ESS10,
- Review resources in place, identify and communicate needs for additional resources dedicated to stakeholder engagement and grievance management activities,

- Review the Grievance Database and debrief on the process of addressing grievances received,
- Maintain constant connection with beneficiaries in order to identify potential Project risks at an early stage,
- Periodically update the list of stakeholders as new stakeholders are identified for the Project,
- Periodically update the Stakeholder Engagement Plan as the Project progresses,
- Debrief following each stakeholder engagement activity to agree on any actions which require follow up and coordination with additional institutions for implementation,
- Coordinate and agree on the content of reporting to external Project stakeholders.

The implementation of this SEP is the overall responsibility of KOSGEB. KOSGEB will closely liaison with other relevant institutions, governmental bodies, local governments, and affected communities and individual as well as other stakeholders to engage with them and ensure full disclosure of information and documents as defined by this draft SEP.

7 Grievance Mechanism

The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

The grievance mechanism will be regularly reviewed to ensure it is appropriately capturing and closing out the grievances and is fit for purpose. The grievance mechanism will allow community members and other stakeholders to address grievances related to a wide variety of topics such as community health, safety and security and labor related issues.

7.1 KOSGEB's Grievance Mechanism for the Project

The grievance mechanism enables any stakeholder to make a complaint or a suggestion about the way the Project is being implemented. Grievances may take the form of specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

The purpose of the grievance mechanism procedure is to implement a formalized process (identification, tracking and redress) to manage complaints/grievances from beneficiaries and other stakeholders in a systematic and transparent manner that could potentially arise from the Project. The grievance mechanism should ensure adequate access to adequate remedy for affected parties, other interested parties and Vulnerable and Disadvantaged Groups.

KOSGEB is currently maintaining a Grievance Mechanism (GM) for project beneficiaries and other stakeholders under the WB-funded project which is Rapid Support for Micro and Small Enterprises Project (P174144). The GM is based on KOSGEB's existing communication channels and can be extended to cover the

Post-Earthquake MSME Recovery Project as well. The processes of the GM are operated through the means of the following grievance mechanisms:

- a. Application with petition
- b. Application to CİMER
- c. Application to KOSGEB Call Center
- d. Sending direct e-mail to the KOSGEB PIU (to be announced)

a) Application with petition

Beneficiaries will report their problems with a petition to the KOSGEB PIU. If the issues stated in the petition require any inspection process (bribery, favoritism, insults, personnel complaints, etc.), the application will be sent to the KOSGEB Guidance and Inspection Board. Applications that do not require the inspection process will be directed to the Directorate with respect to the complaint. The response will be evaluated within the Directorate, and then sent to complainant. The petition regarding the complaint will be kept in the KOSGEB Document Software. In accordance with the law on the use of the right of petition, "Petitioners who are Turkish citizens and foreigners residing in Türkiye are reasoned to respond within thirty days at the latest, as a result of their applications to the competent authorities regarding their wishes and complaints about the public, or the purity of the transaction being made."

b) Application to CİMER

Presidency's Communication Center (CİMER) is a public relations application that is implemented on receiving and responding to the problems, wishes, demands and complaints of citizens in the fastest way. There are three different ways to express their complaints, suggestions and requests through the CİMER:

- 1) Firstly, an application can be made using the CİMER Application Form on the official website of the Presidency (<https://www.cimer.gov.tr>).
- 2) Their suggestions and complaints can be sent to the Presidency via the CİMER link on the E-Government portal and on the KOSGEB homepage.
(<https://www.kosgeb.gov.tr/site/tr/genel/IletisimMerkezi>)
- 3) Phone application can be made with dialing 150.

According to Directorate of Communications of Presidency of the Republic of Türkiye, if the subject of the application to CİMER contains a specific request, complaint or notice, the related institutions has to give a definite positive or negative answer within 30 days. If the subject of the application to CİMER is an information and/or document request in accordance with the Law No. 4982 on the Right to Information, the response time is 15 working days.

The application received is firstly forwarded by the Presidency to the Ministry of Industry and Technology of the Republic of Türkiye. Ministry of Industry and Technology directs the applications related to KOSGEB to the KOSGEB Corporate Communication Directorate. If the issues stated in the application require any inspection process (bribery, favoritism, insults, personnel complaints, etc.), the application is forwarded to the Directorate of Guidance and Inspection by the Corporate Communications Directorate. Applications that do not require an inspection process are directed to the Directorate with respect to the complaint by the KOSGEB Corporate Communications Directorate and the application is answered by the Directorate. The application regarding the person's complaint is kept digitally in the CİMER system. An application may be made to the judicial and administrative judicial authorities regarding the response to the complaint.

c) Application to KOSGEB Call Center

Beneficiaries will submit their complaints regarding the Project directly to the KOSGEB via dialing KOSGEB Call Center. Applications will be stored digitally in the Help Desk software by the call center personnel.

KOSGEB Call Center (444 1 567), which is active 7/24, will be used to provide information about the Project regarding complaints received, as well as corrective actions.

After the Project becomes effective, a training will be organized for KOSGEB Call Center personnel regarding the complaints and suggestions that may be received upon the Project in order to increase their knowledge about the Project.

d) Sending direct e-mail to the KOSGEB PIU (to be announced)

After the Project becomes effective, a project-specific e-mail address will be obtained. This e-mail of the KOSGEB PIU will be added on the KOSGEB website on the World Bank project special page. Anonymous complaints and E&S related grievances will be allowed to be sent to KOSGEB PIU via this e-mail. Complaints filed in this way will be recorded by the KOSGEB PIU.

All these channels will be actively used throughout the life cycle of the Project. KOSGEB PIU will keep a record of all grievances in a grievance log, and is required to work with the Project Management if necessary to resolve grievances. PIU will report grievances to the World Bank periodically throughout the Project. Timeframe for the closure of grievances is summarized in the below Table 6.

Table 6 Timeframe for the Respond and Resolve of Grievances

Methods	Closure Time
Application with petition	<ul style="list-style-type: none"> Within 60 days according to Turkish Administrative Procedure Law No. 2577
Application to CİMER	<ul style="list-style-type: none"> Within 30 days for the specific request, complaint or notice according to Directorate of Communications of Presidency of the Republic of Türkiye Within 15 working days for an information and/or document request in accordance with the Law No. 4982 on the Right to Information
Application to KOSGEB Call Center	<ul style="list-style-type: none"> Instantly Within 15 working days for resolving the grievance (only if there is an extra process to address the grievance due to compelling reasons)
Sending direct e-mail to the PIU	<ul style="list-style-type: none"> Within 2 working days for responding the grievance Within 15 working days for resolving the grievance (only if there is an extra process to address the grievance due to compelling reasons)

7.2 KOSGEB's Grievance System for Employees

KOSGEB aims to meet the needs and expectations of its employees through a grievance mechanism. There is an internal grievance mechanism for KOSGEB employees including direct workers and contracted workers to receive, recognize, classify, investigate, respond and resolve complaints in a timely, planned and respectful manner. Such workers have been informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. All KOSGEB employees have the right to file their grievances and requests and to bring a lawsuit due to the administrative procedures applied to them by

their supervisors or the workplace. The grievance mechanism has been adapted to receive sexual exploitation and abuse and sexual harassment complaints.

Grievances are filed verbally or in writing. The processes of the GM for Project's staff within KOSGEB are operated through the means of the grievance mechanisms described in section 7.1 in this SEP. Therefore, the GM will be accessible to all employees through various means which are CIMER, direct email and petition. Grievance database to facilitate tracking, analysis, and monitoring logbook will be maintained in the PIU office.

Grievances are managed starting with the closest supervisor, bypassing the supervisors who are complained about. Written grievances are filed with a petition written in accordance with the legislation. The elimination of the deficiencies identified in the petition and the grievances that do not constitute a crime are handled by the superiors who accept the grievance. These principles are also followed in verbal grievances. All personnel have the right to fill out a petition and submit it to the KOSGEB Human Resources Department.

Personnel have the right to submit suggestions, express concerns and grievances related to the workplace, and to file complaints and lawsuits due to the administrative actions and procedures applied to them by their supervisors or the workplace. If the complaint issue is about working conditions, KOSGEB Administrative Support Services Department will be involved for redress.

Complaints about ethical issues such as sexual abuse / harassment received from KOSGEB employees (including PIU) are evaluated by paying attention to the confidentiality of employee information. Since complaints received on ethical issues include sensitive issues, they are definitely shared with the Guidance and Supervisory Board for review. All procedures regarding the examination of complaints and their notification to the complainants by making a decision must be completed within 30 days at the latest following the date on which the complaint petition is submitted to the decision-making authority. The provisions of the relevant legislation are applied for the complaints that will be subject to judicial and administrative investigation. The Project workers' grievance mechanism will not prevent workers to use judicial procedure. The GM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints with the consent of the survivor.

Anonymous complaints will be allowed to be sent to PIU via e-mail (to be announced). Complaints filed in this way will be recorded by the PIU. Grievances may be submitted anonymously. Grievances can be submitted without providing the complainant's name or contact details with the understanding this might result in difficulties in some cases. A grievance made anonymously is to be addressed without knowledge of the name of the individual initiating the grievance.

The process will not impede access to other judicial or administrative remedies or those included in applicable Collective Agreements. All Project workers will be informed about the grievance process upon commencement of employment. Monitoring and auditing of the Worker Grievance Process will be undertaken to determine the effectiveness of the process and also to identify recurrent worker issues. Monitoring and auditing will be implemented periodically and/or whenever recurrence happens three times in a row.

Management of Sexual Exploitation and Abuse/Sexual Harassment issues

Although the SEA/SH risk from project activities is low, the grievance mechanism shall include handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. 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.

The KOSGEB GM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher-level superior or go directly to the police, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the KOSGEB's GM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. If the KOSGEB receives

a SEA/SH related grievance, these grievances will be directed to national referral systems immediately and record that this has been directed. All details of the complainant of the sensitive case will be kept strictly confidential.

7.3 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 redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

A complaint may be submitted in English or Turkish. The complaint must clearly state the adverse impact(s) allegedly caused or likely to be caused by the Bank-supported project. This should be supported by available documentation and correspondence to the extent possible. The complainant may also indicate the desired outcome of the complaint. Finally, the complaint should identify the complainant(s) or assigned representative/s and provide contact details. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

7.4 Grievance Log

E&S expert within KOSGEB PIU will maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. The log will contain the following information:

- Date of submission
- Content and details of the grievance
- Details of corrective action proposed
- E-mail or phone number of person submitting the grievance (or anonymous)
- Grievance method (by e-mail, CIMER, KOSGEB call center, petition)
- Date when the proposed corrective action is sent to the grievant (if appropriate)
- Deadline for closure
- Date of closure
- Date when the response is sent to the grievant
- Status (Closed / Open)
- CIMER grievance information (only for CIMER grievances)
 - CIMER No
 - CIMER Grievance Type ((i) Request, (ii) Opinion and Suggestion, (iii) Knowledge Acquisition, (iv) Complaint)

Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance is rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures. Logging a grievance does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by legal framework.

7.5 Grievance Database Reporting

E&S expert within KOSGEB PIU will be in charge of reporting grievance database which will be part of the Regular E&S Monitoring Report in order to assess the performance of the Project GRM. The reporting will contain the following information:

- Project related-grievances (divided by categories)
- Total number of received complaints/inquires (since the beginning of the Project)
- Number of complaints/inquires received during the reporting period
- Open grievances (number and percentage)
- Closed grievances (number and percentage)
- Waiting decision of appeals committee (number and percentage)
- Open grievances more than 30 days (number and percentage)

8 Monitoring and Reporting

The monitoring measures are to be implemented throughout the Project phases to assess compliance of SEP with the dedicated Project Standards. In the event that monitoring identified non-conformance with the Project Standards, these will be investigated and appropriate corrective actions will be identified. Stakeholder engagement should be monitored and reported by KOSGEB throughout the entire life cycle of the project, which will involve:

- Updates of the stakeholder list;
- Sufficient resources to undertake the stakeholder engagement;
- Minutes of all meetings and attendance registers (sex disaggregated);
- Inclusivity of Disadvantaged & Vulnerable Individuals or Groups;
- Records of all consultations held;
- Records of all grievances received and dealt with;
- Statistics on grievance subjects;
- Status of grievances (open/closed); and
- Average grievance resolution times.

The recorded grievances raised by the communities and the workers will be summarized and reported to Project Manager in PIU periodically. All stakeholder engagement activities, grievances and the feedbacks will be disclosed in the periodically E&S Monitoring Report. The reporting frequency may vary depending on the content of the ESCP to be prepared.

8.1 Involvement of Stakeholders in Monitoring Activities

KOSGEB will maintain communication channels with identified stakeholders as determined. KOSGEB will be seeking feedback from beneficiary firms and other relevant stakeholders throughout the project and PIU will discuss the results of the progress reports with relevant stakeholders as needed. A midterm survey on Citizen Engagement will be conducted by KOSGEB PIU to seek feedback from the beneficiary firms on their satisfaction with the Project.

KOSGEB will take into account the inputs and comments received from stakeholders through the Grievance Mechanisms and consultations regarding the Project. In case of any inquiries about a specific aspects or any other monitoring inquiry, the feedback will be evaluated in KOSGEB's formal corporate communication procedures and appropriate response will be provided to the related stakeholder.

8.2 Reporting Back to Stakeholder Groups

Once consultation with stakeholders has taken place, stakeholders generally want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, projects impacts are being monitored.

In line with international best practices stipulated by the ESS10, the Project is committed to providing stakeholders with Project information on an ongoing basis throughout Project development and implementation. Where feedback demands changes and/or adaptations to Project, these updates will be communicated to stakeholders.

KOSGEB will report to stakeholder groups through consultation meetings. Meeting minutes will be shared at the next consultation meetings. Feedback received through GRM will be responded to verbally and in writing. Important Project updates will be published on the KOSGEB official website.

Project updates including stakeholder engagement activities will be posted on KOSGEB's official website and be available in printed form when relevant.

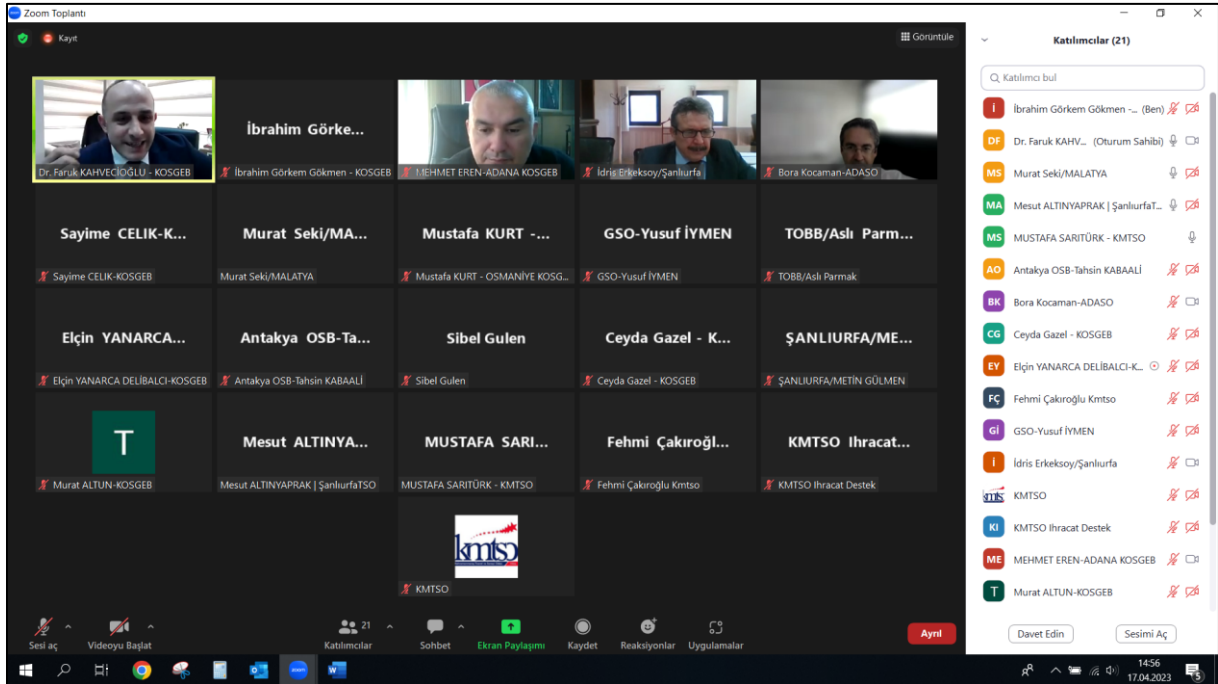
Stakeholder engagement activities will be reported back to the World Bank periodically as part of the regular E&S monitoring reports. The reporting frequency may vary depending on the content of the ESCP to be prepared.

References

- The World Bank (2017). *Environmental and Social Framework*. International Bank for Reconstruction and Development (pp. 15-31 & pp. 97-103).
- The World Bank (2018, June). *Guidance Note for Borrowers, ESS1: Assessment and Management of Environmental and Social Risks and Impact (First Edition)*. Environmental & Social Framework for IPF Operations.
- The World Bank (2018, June). *Guidance Note for Borrowers, ESS10: Stakeholder Engagement and Information Disclosure (First Edition)*. Environmental & Social Framework for IPF Operations.
- KOSGEB Legislations (2022, November 9). <https://www.kosgeb.gov.tr/site/tr/genel/detay/5560/mevzuat>.
- KOSGEB Organization Chart (2022, June 22). <https://www.kosgeb.gov.tr/site/tr/genel/detay/6320/teskilat-semasi>
- KOSGEB Knowledge Acquisition. <https://www.kosgeb.gov.tr/site/tr/genel/IletisimMerkezi>.
- Presidency's Communication Center (n.d.). *50 Soruda CİMER*. Presidency of the Republic of Türkiye, Directorate of Communications. <https://www.cimer.gov.tr/50sorudacimer.pdf>

Appendix

1. Photos of stakeholder participation meeting held online on 17.04.2023.



Dr. Faruk KAHVECİOĞLU - KOSGEB ekranını görüntüleyorsunuz Seçenekleri Görüntüle

KOSGEB

DEPREM SONRASI MİKRO, KÜÇÜK VE ORTA İŞLETMELER İÇİN İYİLEŞTİRME DESTEĞİ PROJESİ

06.02.2023 tarihinde gerçekleşen Kahramanmaraş merkezli depremlerin etkilendiği bölgede, Türkiye nüfusunun %16,43'ü yaşamaktadır.



İbrahim Görke...
İbrahim Görkem Gökmen - KOSGEB
Dr. Faruk KAHVECİOĞLU - KOSGEB
İdris Erkeksoy/Şanlıurfa
Elçin YANARCA...
Elçin YANARCA DELİBALCI-KOSGEB
MEHMET EREN-ADANA KOSGEB

Sesi aç Videoyu Başlat Katılımcılar 17 Sohbet Ekran Paylaşımı Kaydet Reaksiyonlar Uygulamalar Aynt