

**TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY
PROJECT (PUMREP)**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Kayseri Water and Sewerage Directorate's (KASKİ) 8,600 KWe Solar
(Photovoltaic) Power Plant Project**

APRIL 2025

Document History

Revision	Submitted to	Issue Date	Revision Details
V1	İL BANK	April 07, 2025	Draft
V2	İL BANK	May 09, 2025	Draft

Sub-Project Information	
Sub-Project	Details
Name	8,600 KWe Solar (Photovoltaic) Power Plant Project Stakeholder Engagement Plan (SEP)
Project Owner/ Sub-borrower	Kayseri Water and Sewerage Directorate (KASKI)
Financial Intermediary	İller Bankası A.Ş (ILBANK)
Prepared by	Kolay Enerji Engineering & Consultancy

Contents

Contents	i
LIST OF TABLES	ii
LIST OF FIGURES	iii
EXECUTIVE SUMMARY	5
1. INTRODUCTION/PROJECT DESCRIPTION	7
1.1. Objectives	7
1.2. Components.....	7
1.3. Location	7
1.4. Area of Influence	9
2. OBJECTIVE/ DESCRIPTION OF SEP	11
3. STAKEHOLDER IDENTIFICATION AND ANALYSIS	12
3.1. Methodology	12
3.2. Affected parties and other interested parties	12
3.3. Disadvantaged/ vulnerable individuals or groups	13
4. STAKEHOLDER ENGAGEMENT PROGRAM	15
4.1. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement	15
4.2. Summary of Stakeholder Engagement Done During Sub-Project Preparation	19
4.3. Stakeholder engagement plan	20
5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES	22
5.1. Project Implementation Unit (PIU)	22
5.2. Management functions and responsibilities	23
6. GRIEVANCE MECHANISM	25
6.1. Project Level Grievance Mechanism	26
6.2. National Level Grievance Mechanism	26
6.3. Grievance Mechanism for Workers	27
7. MONITORING AND REPORTING	29
7.1. Summary of how SEP implementation will be monitored and reported	29
7.2. Reporting back to stakeholder groups	30
ANNEXES	31
Annex-A Sample Grievance Submission Form.....	31
Annex-B Sample Grievance Closure Form.....	33
Annex-C Sample Consultation Form (For Stakeholder Participation Meeting(s)).....	33
Annex-D Sample Grievance Log Form.....	35
Annex-E Consultation form for a consultation meeting with a stakeholder during the subproject preparation phase.....	35

LIST OF TABLES

Table 1. Sub-project location	20
Table 2. Coordinates of the sub-project area	23
Table 3. Stakeholder Engagement Plan	29
Table 4. Responsibilities.....	12
Table 5. Operational flow chart of Grievance Mechanism.....	12
Table 6. Reporting Process Requirements and Distribution of Roles	12

LIST OF FIGURES

Figure 1: Map of Sub-project Location

Figure 2: Map of Settlements and Facilities Close to the Subproject Area

Figure 3: PIU Organization Chart

LIST OF ABBREVIATIONS

IA	Impact Area
CIMER	Presidency's Communication Centre
YIMER	Foreigners Communication Centre
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
CoC	Code of Conduct
GM	Grievance Mechanism
WGM	Worker Grievance Mechanism
LMP	Labor Management Plan
PAP	Project Affected People
PIU	Project Implementation Unit
ESMR	Environmental and Social Monthly Report
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
PUMREP	Türkiye Public and Municipal Renewable Energy Project
SPP	Solar Power Plant
RE	Renewable Energy
İL BANK:	İller Bankası A.Ş.
WB	World Bank
KASKİ	Kayseri Metropolitan Municipality General Directorate of Water and Sewerage Administration

EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy Project (PUMREP) is financed by the World Bank (WB) to support the deployment of Renewable Energy (RE) technologies in municipalities and to scale up renewable energy in the public sector. The Project aims to support developing cities identifying, preparing, financing investments that enable metropolitan municipalities to plan and invest in a sustainable future while enhancing their urban planning capacities.

Kayseri Water and Sewerage Administration (hereinafter "KASKI") is the owner of this sub-project. Within the scope of PUMREP, KASKI plans to install a land-applied Solar Power Plant (SPP) subproject called KASKI ŞEKER SPP for a connection power of 8,600 kWe. To support the implementation of the subproject, İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI), channeling financial resources to municipalities.

ILBANK has established an Environmental and Social Management System (ESMS) effective from 24th of Dec 2023. The ESMS is designed to align with the WB Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF. It also adheres to the environmental and social (E&S) policies and standards of other International Financial Institutions (IFIs) with which ILBANK collaborates. The ESMS will apply to all ILBANK projects and subprojects financed through International Financial Institutions (IFIs), including the KASKI ŞEKER SPP.

The sub-project is categorized as Moderate Risk Category as per ILBANK ESMS and World Bank's Environmental and Social Framework (WB ESF), 2018. One of the tasks under the scope of the subproject is the preparation of a Stakeholder Engagement Plan (SEP) in accordance with ILBANK ESMS, WB ESF, and the national legislation in force in Türkiye.

The principles of openness and life cycle, informed participation and feedback, inclusiveness and sensitivity, and flexibility were used to define the stakeholders of the subproject. In this way, stakeholder consultations will be conducted openly throughout the life cycle of the project, all stakeholders will be informed and their feedback will be received with appropriate tools and methods, and special attention will be paid to the participation of vulnerable individuals or groups so that all stakeholders have equal access to information.

The main objectives of this SEP are presented below;

- Identify stakeholders affected by the sub-project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and promote effective and inclusive relationships with "project-affected parties", "other interested parties" and "vulnerable/disadvantaged groups" throughout the sub-project life cycle;
- Ensuring that sub-project information is publicised in a timely, understandable and accessible manner,
- Providing means for "project-affected parties", "other interested parties" and "vulnerable/disadvantaged groups" by the sub-project to express their opinions, suggestions and grievances

This Stakeholder Engagement Plan, in the first sections, sets out the purpose of the subproject, its area of influence, presents the methodology used in determining stakeholders, specifies the

needs of stakeholder categories for effective participation, and the tools and methods through which their participation will be ensured. Under 5th and 6th headings the plan sets out the structure of the subproject Implementation Unit, what the responsibilities of stakeholders are in implementing the plan, and the structure of the grievance mechanism and how it will function. In the 7th and final section, the plan emphasizes the responsibilities of the parties in monitoring and reporting stakeholder engagement activities and provides a way of how monitoring and reporting activities will be carried out and how feedback will be provided to these groups.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1. Objectives

PUMREP is financed by the World Bank (WB) to support the deployment of RE technologies in municipalities and to scale up renewable energy in the public sector. İLBANK and the WB have established a support system for developing cities to identify, prepare, finance and finance investments for metropolitan municipalities to plan for and invest in a sustainable future, and to develop their urban planning capacities for this purpose. One of the areas of support is in the areas of institutional capacity building and Energy Efficiency and Renewable Energy.

PUMREP (hereinafter referred to as the “Project”) aims to increase the use of renewable energy through self-generation in public facilities. The Project will contribute to expanding the market for distributed RE in public facilities, helping to demonstrate leadership in the public sector to use sustainable energy solutions to fulfill the country's climate mitigation commitment and increase energy security.

Within the scope of PUMREP, KASKI plans to establish a land applied Solar Power Plant (SPP) sub-project called KASKI ŞEKER SPP for 8,600 kWe connection power.

1.2. Components

The project will be implemented through 4 components:

Component 1: Renewable energy investments in central government facilities

Component 2: Renewable energy investments in municipalities

Component 3: Technical assistance and project implementation support

Component 4: Emergency Response Component (CERC).

KASKI applied to İLBANK for the sub-financing of KASKI ŞEKER SPP 8,600 KWe under Component 2. The Sub-Project is located on 7099 Block 58 Parcel in Şeker Neighbourhood, Kocasinan District of Kayseri Province.

1.3. Location

KASKI's 8,600 KWe Solar (Photovoltaic) Power Plant Project' is in Kocasinan district of Kayseri province. Kayseri is in the Central Anatolia Region of Türkiye. The sub-project area is located within the borders of Şeker Neighbourhood of Kocasinan District, one of the central districts of Kayseri Province. The distance of sub-project area to Kayseri city center is 16 km. Although the sub-project area is in Şeker Neighbourhood, the nearest households are in Yenidoğan Neighbourhood. The closest household to the sub-project area is within the borders of Yenidoğan Neighbourhood and its distance to the area is 150 m.

The land of the sub-project area belongs to KASKİ and no land acquisition or expropriation will be required during the construction and operation phases of the sub-project. The electricity to be generated at the newly established ŞEKER SPP will be connected to the national electricity grid via the existing KASKİ DM HRTR37 within the same SPP site via the underground earth line to be excavated within the SPP site. Therefore, there is no private land along the Energy Transmission Line (ETL) route and no land acquisition is required for the ETL.

Information on the Sub-project location is presented in table 1.

Table 1: Sub-project Location

Information	Remarks/ Notes
Province	Kayseri
District	Kocasinan
Neighborhood/ Village	Şeker
Land Area (ha)	16.5796
Land Use Type according to Title Deed	Field
Current Land Use	Empty field. There is no formal or informal activity in the sub-project area.
Other Nearby Facilities and Activities	Kayseri City Hospital (2200 m) Furniture City Industrial Area (1900 m) Kayseri Sugar Factory Area (1600 m) Şehit İstihkam Er Suat Özgan Primary School (500 m)

A map of the Sub-project location is presented in figure 1:

Figure 1: Sub-project location

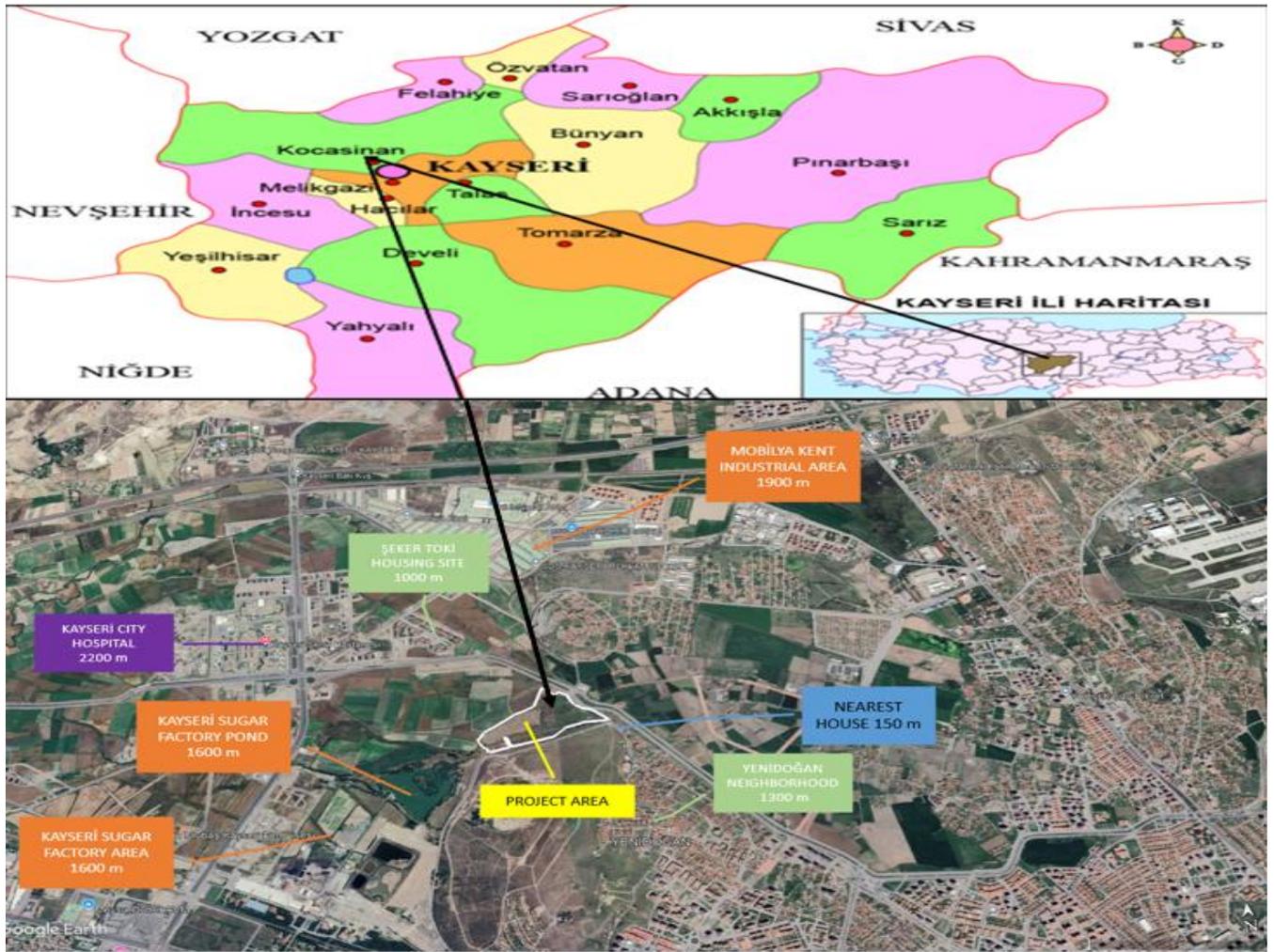


Table 2. Coordinates of the Sub-project Area

Unit	Coordinates (WGS84 in decimals)	
	Y	X
Sub-project Area	38.760381	35.429227

1.4. Area of Influence

According to the WB ESSs, “where the project includes specifically identified physical elements, issues and facilities likely to generate impacts, environmental and social risks and impacts will be defined as the project impact area (IA).” Thus, the IA of the sub-project consists of urban or rural areas likely to be affected by the sub-project, its activities and the facilities directly owned, operated, or managed (including by contractors/subcontractors).

The impact area of the sub-project covers the following environmental and social aspects:

The sub-project site, surrounding settlements and access roads were assessed to determine the Area of Impact (IA). When a circle with a diameter of 200 m was drawn from the sub-project area to determine the Area of Impact (IA), the closest settlement was a few houses located within the Yenidoğan neighborhood boundary. Houses in the Yenidoğan neighborhood are approximately 150 m from the subproject area. Considering the environmental and social impacts that will be caused by the Subproject, it has been determined that local people living in these neighborhoods will be affected by dust and noise, especially from topsoil stripping. Therefore, these neighborhoods are included in the EA of the Subproject. In addition, although the Şehit İstihkam Er Suat ÖZGAN primary school, which is 500 m away from the sub-project area, is not located within the sub-project impact area, it has been determined that the roads used for transportation and logistics are not between the roads used by school students. The fact that part of the construction phase coincides with the summer school holidays will ensure that school students will not be affected by dust and noise risks caused by topsoil stripping and steel pile driving works.

Figure 2: Map of Settlements and Facilities Close to the sub-project Area



2. OBJECTIVE/ DESCRIPTION OF SEP

KASKI ŞEKER SPP project will increase the diversity of renewable energy sources and provide sustainable and durable electricity solutions for public services. This sub-project covers the construction of solar power plants, connection to the grid and installation and operation of energy facilities.

This SEP, prepared within the scope of the World Bank's Environmental and Social Standard No. 10, Stakeholder Engagement and Disclosure of Information, provides a framework to support the establishment of a seamless engagement process among stakeholders who are likely to be affected by or interested in the KASKI ŞEKER SPP project. The document also contributes to managing stakeholder expectations and supporting risk management by providing early, frequent and open communication throughout the sub-project lifecycle.

The main objectives of this SEP are presented below;

- Identify stakeholders affected by the sub-project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and promote effective and inclusive relationships with sub-project affected parties throughout the sub-project life cycle;
- Ensuring that sub-project information is publicised in a timely, understandable and accessible manner,
- Providing means for the parties affected by the sub-project to express their opinions, suggestions and grievances

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1. Methodology

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

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

For the KASKİ ŞEKER SPP project, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties, other interested parties and disadvantaged/vulnerable individuals or groups.

3.2. Affected parties and other interested parties

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

- Residents of Seker Neighbourhood
- Yenidoğan Neighbourhood Residents
- Persons who will work within the scope of the sub-project

Other Interested Parties are individuals or groups that are not directly involved in the project, but may nevertheless have an interest in project outputs, decisions or activities. A list of this stakeholder group is presented below:

- Residents living outside Şeker and Yenidoğan neighbourhoods in Kayseri province, which are close to the sub-project area
- Ministry of Industry and Technology

- Ministry of Energy and Natural Resources
- Ministry of Environment and Urbanisation
- Kayseri Provincial Directorate of Industry and Technology
- Kayseri Provincial Directorate of Environment, Urbanisation and Climate Change
- Kayseri Governorship
- Kayseri Metropolitan Municipality
- Kocasinan District Governorship
- Kocasinan District Municipality
- Turkish Electricity Transmission Company (TEIAS) 11th Regional Directorate
- Turkish Electricity Distribution Corporation (TEDAŞ) 13th Regional Directorate
- Chamber of Electrical Engineers Kayseri Provincial Representative Office
- Anadolu Agency Regional Directorate
- Local Television Channels and Newspapers

3.3. Disadvantaged/ vulnerable individuals or groups

The vulnerable and disadvantaged groups living in Şeker Neighbourhood, where the sub-project area is located, and Yenidoğan Neighbourhood, the other settlement closest to the sub-project area, have been identified as follows.

Information on disadvantaged / vulnerable individuals and groups living in Şeker Neighbourhood is presented below:

- People over 65 living alone: Field studies revealed that the number of people over 65 living alone in this neighbourhood is 22. It is foreseen that these people may have problems in accessing information due to physical and technological disadvantages.
- Persons with disabilities and their caregivers: During the field studies, it was determined that 16 people with disabilities (13 physically, 3 mentally) live with their families in this neighbourhood. Persons with disabilities may not be able to read the information materials due to their physical disadvantages and may have problems in accessing the places where information meetings are held. Caregivers of persons with disabilities may find it difficult to leave them behind and attend information meetings.
- Female-headed households: It was shared by the mukhtar that there are 6 women in the neighbourhood who lost their husbands, live with their children and are responsible for providing for the household. These women may have difficulty in participating in information activities due to the intensity of domestic and extra-domestic labour processes and not being able to leave their children behind.

Information on disadvantaged/sensitive individuals and groups living in Yenidoğan Neighbourhood is presented below:

- Migrants and refugees: Field studies revealed that 2 Syrian and 25 Afghan families live in this neighbourhood. These people may experience difficulties in accessing information due to language barrier.
- Persons with disabilities and their caregivers: Field studies revealed that 57 disabled people (41 physically, 16 mentally) live with their families in this neighbourhood. Persons with disabilities may not be able to read the information materials due to their physical disadvantages and may have problems in accessing the places where

information meetings are held. Caregivers of persons with disabilities may find it difficult to leave them behind and attend information meetings.

- Female-headed households: It was shared by the mukhtar that there are 3 women in the neighbourhood who lost their husbands, live with their children and are responsible for providing for the household. These women may have difficulty in participating in information activities due to the intensity of domestic and extra-domestic labour processes and not being able to leave their children behind.

4. STAKEHOLDER ENGAGEMENT PROGRAM

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

The needs, participation and access status of each of the stakeholders identified under the previous heading will be different from each other. The appropriate methods, tools and techniques for each stakeholder group are described below:

- **Project Affected Parties (PAPs)**

Stakeholder Group	Needs	Method, Techniques	Tools,	Frequency
Residents of Şeker Neighbourhood	To be informed about sub-project activities	<ul style="list-style-type: none"> • Announcements to be published on the websites and social media accounts of the relevant public institutions • Brochure distribution in the relevant field of activities • Hanging information posters around the relevant activity areas • Distributing Arabic translations of relevant materials in locations where Syrian refugees are living • Conducting community consultation meeting • Publications in local and national level media organs 		<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
Residents of Yenidoğan Neighbourhood	To be informed about sub-project activities	<ul style="list-style-type: none"> • Announcements to be published on the websites and social media accounts of the relevant public institutions • Brochure distribution in the relevant field of activities 		<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

		<ul style="list-style-type: none"> • Hanging information posters around the relevant activity areas • Distributing Arabic translations of relevant materials in locations where Syrian refugees are living • Conducting community consultation meeting • Publications in local and national level media organs 	
Persons who will work within the scope of the subproject	To be informed about sub-project activities	<ul style="list-style-type: none"> • Formal meetings with them • Correspondence to them 	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

• **Other Interested Parties (OiP)**

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
Residents outside the sub-project area in Kayseri province	To have general information about the sub-project	Announcements to be published on the websites and social media accounts of the relevant public institutions	In case of demand or significant change
Public Institutions: <ul style="list-style-type: none"> • Ministry of Industry and Technology • Ministry of Energy and Natural Resources • Ministry of Environment and Urbanisation • Kayseri Provincial 	To have general information about the sub-project	<ul style="list-style-type: none"> • Correspondence to them • Announcements to be published on the websites and social media accounts of the relevant public institutions 	Quarterly

<p>Directorate of Industry and Technology</p> <ul style="list-style-type: none"> • Kayseri Provincial Directorate of Environment, Urbanisation and Climate Change • Kayseri Governorship • Kayseri Metropolitan Municipality • Kocasinan District Governorship • Kocasinan District Municipality • Turkish Electricity Transmission Company (TEIAS) 11th Regional Directorate • Turkish Electricity Distribution Corporation (TEDAŞ) 13th Regional Directorate • Chamber of Electrical Engineers Kayseri Provincial Representative Office • Kayseri KASKİ 			
<p>Media:</p> <ul style="list-style-type: none"> • Anadolu Agency Regional Directorate • Local Television Channels and Newspapers 	<p>To be informed about the sub-project activities</p>	<ul style="list-style-type: none"> • Announcements to be published on the websites and social media accounts of the relevant public institutions • One-on-one interviews 	<p>Quarterly</p>

		• Press release	
--	--	-----------------	--

• **Disadvantaged/Vulnerable Individuals or Groups**

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
Over 65 years of age living alone	They may have problems accessing information due to physical and technological disadvantages	Verbal information can be provided through one-to-one or group-oriented interviews, or transport support can be provided to attend meetings	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
People with disabilities and their carers	People with disabilities may not be able to read information materials due to physical disadvantages and may have problems accessing the venue of information meetings. Carers of people with disabilities may find it difficult to leave their carers behind and attend information meetings.	Materials suitable for visually impaired individuals can be prepared. Care should be taken to ensure that the venues where public participation meetings will be held are suitable for the physically disabled. Informative materials can be delivered to the caregivers of disabled people through one-to-one interviews. Transport support can be provided when they attend public participation meetings.	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
Female-headed households	These women may find it difficult to participate in information activities due to the intensity of their domestic and non-domestic labour processes and their inability to leave their children behind.	Verbal information can be provided through one-to-one or group-orientated interviews.	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

Migrants and refugees	The level of participation may remain low due to language barriers.	Materials should be translated into Arabic and Afghan languages (Darji, Pashto, etc. as needed). Group-orientated oral information can be provided.	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
-----------------------	---	---	---

4.2. Summary of Stakeholder Engagement Done During Sub-Project Preparation

In the settlement where there is a house and a barn 120 m away from the sub-project area, it was determined that a family engaged in small cattle breeding lives. During the consultation meeting with project affected person, who resides in the house, it was determined that his livelihood is animal husbandry (Consultation form is presented in Annex E). He was asked his opinion on whether he and his livelihood, livestock breeding, would be negatively affected by the realization of the Şeker SPP sub-project. In this consultation meeting, project affected person, who has a barn on the land with the parcel number 7335/1 and whose main source of income is animal husbandry, stated that the sub-project area is surrounded by a wire fence and that his animals rarely enter this area through some damaged parts of the wire fence, but that this area is not used as pasture. He stated that the area they use as pasture is in Yenidoğan Neighborhood. It is understood that the construction of SPP in the sub-project area will not have a negative impact on livelihood. Designated grazing areas are available in the pasturelands located to the southwest of the sub-project site. These areas are outside the fenced subproject boundaries and will remain accessible for animal grazing activities. Before the mobilization and construction phase of the sub-project begins, the social expert of the consultant company will hold a consultation meeting with the residents engaged in animal husbandry and identify what their concerns and needs are regarding the sub-project.

At the Public Consultation Meeting, information about the project was provided by the consultant firm Kolay Enerji. Details are as follows:

The opening speech of the meeting was made by Kolay Enerji’s Environmental Expert and Social Expert. General information was given about the WB-financed Turkey Public and Municipal Renewable Energy Project (PUMREP), the purpose of the project was explained, why this project was prepared and the activities to be carried out within the scope of the project were given.

Within the scope of Public Consultation Meeting, the areas where the sub-project will be carried out (as neighborhood, block and parcel), project power, technical specifications of equipment to be used, annual production of the project were specified and information was given that the legislative obligations were fulfilled.

General information about the Environmental and Social Management Plan (ESMP) of Kayseri KASKİ KİBAAT-2 SPP and Kayseri KASKİ ŞEKER SPP Projects, why the ESMP was prepared, and that the environmental and social risks of the sub-project were assessed within the scope of the ESMP were provided by the Environmental Expert from the consultancy firm. The contributions of the project to KASKİ and technical information about the project were provided, and the importance of how the construction activities would be carried out and how the impacts of the construction activities would be prevented within the scope of the project were emphasized. In addition, the consulting firm’s social expert has indicated the channels

through which potential complaints can be communicated during the construction and operation phases. Comprehensive information was provided to relevant stakeholders on how they could access these mechanisms, and communication methods were clearly shared.

4.3. Stakeholder engagement plan

A stakeholder engagement plan is an important tool for a project or organisation to communicate effectively with its stakeholders, manage the project successfully and achieve its objectives. This tool includes who will communicate with which stakeholder group, at which stage of the project, with which objectives and methods in line with these objectives. A summary of this is presented in table 3 below:

Table 3: Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Before the construction activities start	Informing about sub-project activities and recording comments and suggestions, answering questions	Conducting public participation meeting, publishing information about sub-project activities	Project Affected Parties	Contractor Consultant Kayseri KASKİ
	Before the construction activities start	Informing about sub-project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions	Other Interested Parties	Contractor Consultant Kayseri KASKİ
	Before the construction activities start	Informing about sub-project activities and recording comments and suggestions, answering questions	One-to-one face-to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Contractor Consultant Kayseri KASKİ
Construction	During the construction phase	Informing about sub-project activities and recording comments and suggestions, answering questions	Conducting public participation meeting, publishing information about sub-project activities	Project Affected Parties	Contractor Consultant Kayseri KASKİ
	During the construction phase	Informing about the sub-project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions, correspondence between institutions	Other Interested Parties	Contractor Consultant Kayseri KASKİ
	During the construction phase	Informing about sub-project activities and recording comments and suggestions, answering questions	One-to-one face-to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Contractor Consultant Kayseri KASKİ

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Operation	During the operation phase	Informing about the sub-project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions	All stakeholder categories	Kayseri KASKİ

KASKI will make sub-project E&S documents available on its website in both Turkish and English¹. These documents will also be accessible at KASKI office and Kocasinan District Municipality. In addition, sub-project posters and information on the grievance mechanism will be displayed at local points, including the Muhtar's Office of Şeker and Yenidoğan Neighbourhood. Stakeholder consultations will be held to review the draft E&S documents before they are finalised and disclosed. This process will ensure that stakeholders' views and concerns are valued and integrated, promoting a more effective and inclusive outcome.

¹ <https://www.kaski.gov.tr/>

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

The organization structure of the PIU to be established by the Sub-borrower is presented in figure 3:

Figure 3: PIU Organization Chart

Project Implementation Unit Personnel List
Contract Management
Deputy General Manager
Procurement Unit
Branch Manager
Construction Technician
Technical Management
Department Head
Technical Unit
Branch Manager - Civil Engineer
Civil Engineer
Civil Engineer
Electrical Technician
Electrical - Electronics Engineer
Mechanical Engineer
Mapping Technician
Financial Management
Branch Manager
Financial Unit
Officer
Monitoring and Evaluation
Civil Engineer
OHS
Occupational Health and Safety and Civil Defense Branch Manager
Social Specialist
Social Specialist/Sociologist
Environmental Specialist
Environmental Engineer

The Sub-Borrower will ensure the continuity of the PIU by ensuring the appointment and deployment of qualified staff and the continuity of Stakeholder Engagement Activities by allocating an appropriate budget throughout the life cycle of the sub-financing agreement.

Social Specialist who is shown in the organisation chart of the Project Management Unit, will follow the implementation of the Stakeholder Engagement Plan on behalf of KASKI. People will be able to communicate their opinions, suggestions or questions about the sub-project or consultation process to this focal person.

5.2. Management functions and responsibilities

KASKI Project Implementation Unit (PIU) will be the party primarily responsible for the implementation of the SEP. KASKI PIU will have designated staff with responsibilities related to ESMP, SEP and GM.

In addition to KASKI PIU, the responsibilities and activities to be carried out by other stakeholders for the effective implementation of the SEP are presented in the table below:

Table 4: Responsibilities

Responsible Entity	Responsibilities	Activities
PMU of ILBANK	Monitor and control whether KASKI fulfills its responsibilities;	<ul style="list-style-type: none"> Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues; Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
PIU of KASKI	Planning, implementation, monitoring and reporting of SEP	<ul style="list-style-type: none"> Conducting stakeholder engagement activities in close co-operation with ILBANK Project Management Unit Management and resolution of grievances Counselling on specific SEP activities; Publicising major construction activities (such as road closures and service interruptions); Reporting to ILBANK Project Management Unit on the implementation of SEP activities; Effective implementation of the identified grievance mechanism in SEP and informing ILBANK Project Management Unit about the overall implementation status.
Supervision Consultant	To monitor and control whether Contractor fulfills its responsibilities	<ul style="list-style-type: none"> Review the SEP document to redefine the stakeholders affected by and/or interested in the sub-project and to follow up the implementation of the methods, instruments, timing and participation levels identified in the SEP, Interviews KASKI PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the sub-project, Interacts with various stakeholders to get their views on SEP implementation,

Responsible Entity	Responsibilities	Activities
		<ul style="list-style-type: none"> • Controls whether the necessary trainings are given to the personnel who will work during the construction phase, • Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other sub-project activities and to reveal actions, • Meets with WB safeguard policies and audit teams and responds to queries as necessary, • Monitors and reports on progress made in relation to the commitments defined in SEP.
Contractor	<ul style="list-style-type: none"> • To inform ILBANK on all matters related to relations with stakeholders; • To communicate and resolve grievances arising from subproject activities in close and co-operation with ILBANK 	<ul style="list-style-type: none"> • Implements and develops Contractor's social policy, • Provides necessary resources for proper remedial actions, • Notify KASKI of any issues related to interaction with stakeholders; • Communicate and resolve grievances arising from subproject activities in line with KASKI's guidance; • Inform ILBANK Project Management Unit and KASKI about significant construction activities (such as road closures and service interruptions) and issues related to their interaction with stakeholders; • Maintain communication with KASKI Grievance Mechanism Contact Point for follow-up of grievances; • Organising and conducting Stakeholder Participation/Consultation Meetings and related activities related to information sharing with the public; • Inform relevant local communities on environmental and social issues (e.g. noise, vibration, water quality monitoring, community health and safety, etc.); • Develop and implement a grievance mechanism for the environmental and social performance of the sub-project and the labour force, including sub-contractors, prior to the commencement of construction works, in compliance with KASKI's Grievance Mechanism requirements. • The construction contractor should develop monthly ESMRs and submits to KASKI y through the Supervision Consultant

6. GRIEVANCE MECHANISM

In line with ILBANK Environmental and Social Management System and World Bank's Environmental and Social Standard (ESS) 10 a grievance mechanism will be established by KASKI to receive, resolve and follow up the concerns and grievances of sub-project affected communities. KASKI PIU will be accessible to stakeholders and will respond to all grievances (complaints, requests, opinions, suggestions) at the earliest possible time. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded by the PIU in a predetermined timeline and according to their content, and to ensure that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to grievances will be satisfactory to both parties and activities will be monitored and complainants will be informed about the results of corrective actions. In addition, the mechanism required to designed to be suitable for receiving and redressing anonymous grievances. The grievance form in the Annex A will be used in the sub-project and anonymous submission of grievances will be allowed. In addition, the sub-project Grievance Mechanism will include a channel to receive and address confidential grievances related to Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) for which special measures are taken. KASKI PIU is responsible for establishing close relations with all stakeholders.

In case a grievance is received in any of the grievance mechanisms presented below at different levels, the operational flow chart of the grievance mechanism will be followed. This scheme is presented in table 5:

Table 5: The operational flow chart of the Grievance Mechanism

Grievance Process	Requirement / Action
Submitting the grievance	Receiving the grievance by any communication channel explained in SEP.(At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment or Gender Based Violence (GBV), immediate action will be taken within 2 days of receipt of the grievance. In cases of sexual abuse and harassment or potential child abuse at sub-project sites, the grievance will be referred by the GM focal point (located at ILBANK headquarters) to the relevant legal authorities/service providers such as the Ministry of Family and Social Services, Public Prosecutor's Office)
Recording the grievance	The sample grievance will be registered by making an entry in the registration table. All grievances will be logged and feedback given to the complainant within two working days. If the complainant requests that this grievance be handled anonymously, the grievance will be logged anonymously and this request will be honoured.
Referring the grievance	The grievance will be forwarded to the relevant persons responsible for dealing with the grievance (site manager and Project Implementation Unit specialists at construction sites) no later than three working days after receipt (grievances involving emergency situations will be dealt with immediately as appropriate).
Assessment the grievance	Assessment of grievances within 10 working days and determination of whether the grievance meets the admissibility criteria.
Responding to the grievance	If the grievance is valid, corrective measures to resolve the grievance are determined and taken within 15 working days at the latest. If the resolution of the grievance will take longer, a partial response should be given to the complainant and the Grievance Closure Form should be completed.

	<p>All comments and grievances will be responded to verbally or in writing in line with the communication method preferably specified by the complainant, if contact information is provided.</p> <p>At this point, it should be noted that the action and result taken for the anonymously recorded grievance should be shared on KASKI's website so that the anonymous complainant can be informed about the grievance and results.</p>
Recording the outcome of the grievance	Processing of the grievance result in the registration table
Right to object	<p>If the grievance cannot be resolved through the current process, applicants can always appeal to the relevant legal authorities. These institutions can be summarised as follows:</p> <ul style="list-style-type: none"> - Civil Courts of First Instance - Administrative Courts - Commercial Courts of First Instance - Labour Courts, and - Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

6.1. Project Level Grievance Mechanism

The existing grievance mechanism of Kayseri KASKI will be utilised at sub-project level. In addition, measures will be implemented to ensure that anonymous grievances can be submitted and that cases of sexual harassment and sexual exploitation are received confidentially. Information on KASKI's grievance mechanism is provided below:

Website(includes an online grievance form): <https://www.kaski.gov.tr/iletisim>

E-mail: kaski@kaski.gov.tr

Call Centre: 185

Phone Number: [+90 352 432 04 32](tel:+903524320432)

Address: Yakut Mah. Mustafa Kemal Paşa Bul. No:186 Kocasinan / KAYSERİ

6.2. National Level Grievance Mechanism

ILBANK established a transparent and comprehensive Grievance Mechanism (GM) in September 2021 to receive, assess and resolve grievances related to each international project it finances and will be in place throughout the life cycle of this subproject. Stakeholders may, if they wish, submit their comments, suggestions and grievances to ILBANK through the following means of communication:

Website: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>

E-mail: bilguidb@ibank.gov.tr and etikuidb@ilbank.gov.tr

Phone Number: +90 312-508 79 79

Address: ILBANK International Relations Department, Emniyet Mahallesi, Hipodrom Caddesi, No:9/21, Yenimahalle/ANKARA

In the last 10 years, Turkish citizens have adopted a centralised grievances system called the Presidential Communication Centre (CİMER). People from all walks of life and professions have developed the habit of writing letters of grievance to CİMER by e-mail. Therefore, this system should be added to institutional grievance mechanisms. Operating under the Presidential Directorate of Communication, CİMER aims to strengthen the state-society relationship. The information on CİMER is following:

Website: www.cimer.gov.tr

Call Centre: 150

Phone number: +90 312 525 55 55

There is also a grievance mechanism established for foreigners in Türkiye under the Presidency's Directorate of Communication. Information on the Foreigners Communication Centre (YİMER) is provided below:

Website: www.yimer.gov.tr

Call Centre: 157

Phone number: +90 312 5157 11 22

6.3. Grievance Mechanism for Workers

A separate grievance mechanism will be provided for all direct workers and subcontracted workers (and their organisations where relevant) to raise workplace concerns in accordance with the requirements of ESS2. These workers will be informed about the Grievance Mechanism and Code of Conduct (CoC) at the time of recruitment and will be provided with safeguards to protect them from retaliation for using this mechanism. The Workers' Grievance Mechanism (WGM) will be accessible to all workers and subcontractor workers. Grievances will be collected and reported to be managed within the scope of SEP, Workforce Management Plan (LMP) and Grievance Mechanism Procedure. Sub-project workers will be able to raise workplace issues such as unsafe or unhealthy working conditions, working conditions, wages, discrimination, harassment, health and safety concerns or other employment related issues through the grievance mechanism. It will be ensured that the grievance mechanism will be easily accessible for all workers of this sub-project. The design of the workplace grievance mechanism takes into account the grievance mechanism elements defined in the ESS10 and related guidance.

The process defined in the grievance flow chart will also be applied and executed for the workers' grievance mechanism. During the construction phase, the workforce requirement of the subproject will be 30 people at peak. Priority will be given to local employment. For these reasons, a campsite will not be established for the accommodation of workers. Grievance boxes will be placed in places such as cafeteria, common resting area and work area where workers can easily reach but away from security cameras. The boxes will be checked regularly and can only be opened by the responsible person. The Grievance Mechanism for Workers will follow a structured process to address grievances in a timely and fair manner. Workers will

be able to submit their grievances anonymously if they so wish. The grievance mechanism for workers guarantees that grievances will be investigated impartially and that there will be no retaliation against workers who file grievances. Workers' grievances will be kept in the grievance database.

7. MONITORING AND REPORTING

7.1. Summary of how SEP implementation will be monitored and reported

Reporting process that should be put into action during the implementation phase of the Project is an important tool to record and chase Project activities in compliance with the national and WB standards. Therefore, the requirements of such processes are presented table 6:

Table 6: Reporting Process Requirements and Distribution of Roles

Responsible Party	Roles & Responsibility
PIU	Submit monthly Environmental and Social Monitoring Reports (ESMR) prepared by the contractor to ILBANK
Construction Supervision Consultant	Check the monthly Environmental and Social Monitoring Reports prepared by the Contractor and submit them to the PIU
Contractor	The contractor will prepare monthly Environmental and Social Monitoring Reports including grievance records and stakeholder engagement activities to be submitted to KASKI and submit them to the consultant firm for control.

The ESMRs will include following indicators on grievance mechanism and stakeholder engagement activities:

Indicators for stakeholder engagement:

- Number of public participation meetings
- Number of participants of the public participation meetings disaggregated by gender, age, disability, nationality
- For each meeting, the minutes of meetings, actions agreed during these meetings, the status of these actions and how the comments have been incorporated into the sub-project activities will be included in the environmental and social monitoring reports

Indicators for grievance mechanism:

- Number of grievances in total and at local level
- Number of grievances received from stakeholders, sorted and analysed by category
- Number of grievances that were (i) opened (ii) open for more than 30 days (iii) resolved (iv) closed and (v) included responses that satisfied complainants during the reporting period

7.2. Reporting back to stakeholder groups

During the preparation and construction phases of the Subproject, the construction contractor will prepare monthly reports on environmental and social performance for submission to Kayseri KASKI, which will include updates and indicators on the implementation of the stakeholder engagement plan. The monthly reports will be shared with ILBANK and ILBANK will provide quarterly reports to the World Bank.

The person/unit to be assigned by Kayseri KASKI will provide feedback to stakeholder groups through public meetings, primarily in the subproject impact area. The summary of the public meetings will be published after the removal of identifying information in accordance with the Law on the Protection of Personal Data. Feedback received through the Grievance Mechanism (GM) will be responded to in writing and verbally. Important updates on the sub-project will be published on the website of Kayseri Metropolitan Municipality and Kayseri KASKI.

ANNEXES

Annex-A Sample Grievance Submission Form

	KASKI SOLAR POWER PLANT PROJECT GRIEVANCE FORM			
Person Filling Out the Form:			Date and time:	
Interview Agenda:			Reference No: KASKI-Project Code-0001-2..	
1. INFORMATION ABOUT THE COMPLAINANT				
Name surname: <i>If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.</i>			How received the Grievance:	
TC Identification number:			Telephone / Toll Free Line <input type="checkbox"/>	
Telephone:			Face to Face Meeting <input type="checkbox"/>	
Address:			Website / Email <input type="checkbox"/>	
Email:			Other (Explain) <input type="checkbox"/>	
Stakeholder Type				
Public <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterpris <input type="checkbox"/>	Trade Associatio <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industrial Assosiacton <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. DETAILED INFORMATION ABOUT THE GRIEVANCE				
Description of the grievance:				

Solution method requested by the complainant	
Registrant Name Surname/Signature	Complainant Name Surname/Signature

Annex-B Sample Grievance Closure Form

	KASKI	
	SOLAR POWER PLANT PROJECT	
	GRIEVANCE CLOSE OUT FORM	
Reference form:		
1. DETERMINATION OF CORRECTIVE ACTION		
1		
2		<input type="checkbox"/>
3		<input type="checkbox"/>
4		<input type="checkbox"/>
5		<input type="checkbox"/>
2. CLOSE OUT THE GRIEVANCE		
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>		
Name Surname / Signature of the Person Closing the Grievance/Date	Name Surname / Signature of Complainant/Date	

Annex-C Sample Consultation Form (For Stakeholder Participation Meeting(s))

	KASKI	
	SOLAR POWER PLANT PROJECT	
	CONSULTATION FORM	
Person Filling Out the Form:		Date time and place:

Meeting Agenda:		Interview Registration Number:	
1. INTERVIEW INFORMATION			
Interviewed Institution:		Form of Communication	
Name and Surname of the Interviewee:		Telephone / Toll Free Line <input type="checkbox"/>	
Telephone:		Face to Face Meeting <input type="checkbox"/>	
Address:		Website / Email <input type="checkbox"/>	
Email:		Other (Explain) <input type="checkbox"/>	
Stakeholder Type			
State agency <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterpris <input type="checkbox"/>	Job Room <input type="checkbox"/> NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industrial Unions <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/> University <input type="checkbox"/>
2. INTERVIEW DETAILS (List of Invitees and actual participants, Summary of presentations made by whom, minutes of meeting will be annexes of this form.)			
Questions about the project:			
Concerns/feedback regarding the project:			
Responses to the views expressed above:			

ANNEX-E Consultation form for a consultation meeting with a stakeholder during the subproject preparation phase



İSTİŞARE FORMU

İstişare Konusu	7335/1 parsel numaralı sahis araziisinde jüratöler hayvancılık faaliyetlerinin, mülkiyeti KASKI'ye ait olan 7099/58 parsel numaralı arazide yapılacak olan Seker Güneş Enerjisi Santrali'nden etkilenip etkilenmeyeceği		
İstişare Yeri	[Redacted] 'un ahır		
Tarih ve Saat	18/04/2025 11:30	Hazırlayan	

Konu	Tartışılan Konular/Alınan Kararlar
	<p>Seker Güneş Enerjisi Santrali için yapılacak alanın bazı yerlerinde köpekbaşı hayvan dışıkları tespit edilmiş, proje alanına en yakın meşafede ki ahır sahibiyle bir görüşme gerçekleştirilmiş, projenin bu kişinin hayvancılık faaliyetlerini etkileyip etkilemediği konusunda istişare edilmiştir.</p> <p>Bu istişare görüşmesinde 7335/1 parsel numaralı, arazide ahır bulunan ve basıca ekonomik faaliyetinin hayvancılık olduğunu belirten [Redacted] proje alanının çevresinin tel örgülerle çevrili olduğunu, birkaç hayvanın tellerin jippanmış kısmından birkaç kez yarılmış, bu alanın girişini, proje alanının otlak olarak kullanılmadığını, otlak olarak kullandıkları alanın Yenidöğün Mahallesi'nde yer aldığını, hayvanlarını orada otlatıldığını ifade etmiştir.</p>

İstişare Görüşmesi Katılımcıları

Ad-Soyad	Kurum	Unvan	İmza
[Redacted]	Ahır Sahibi		[Redacted]
[Redacted]	Yenidöğün Mahalle Muhtarı		[Redacted]
[Redacted]	KASKI	Makina Müh.	[Redacted]
[Redacted]	KASKI	Elektrik Teknisyeni	[Redacted]