TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP)

3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality

STAKEHOLDER ENGAGEMENT PLAN (SEP)

March, 2025

Sub-Project Inform	Sub-Project Information		
Sub-Project	Details		
Name	Türkiye Public and Municipal Renewable Energy Project (PUMREP) 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality Stakeholder Engagement Plan (SEP)		
Project Owner/ Sub-borrower	Afyonkarahisar Municipality		
Financial Intermediary	İller Bankası A.Ş (İLBANK)		
Prepared by	Ardea Energy Engineering & Consulting		

This Stakeholder Engagement Plan has been prepared by Ardea Energy Engineering and Consulting on behalf of Afyonkarahisar Municipality within the scope of Türkiye Public and Municipal Renewable Energy Project (PUMREP) supported by the World Bank (WB) with ILBANK as the financial intermediary.

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Table of Content LIST OF ABBREVIATIONSvi 2 3.1. Methodology......9 3.2. 3.3. Disadvantaged/Vulnerable Individuals or Groups11 3.4. Summary of Stakeholder Engagement During Project Preparation 16 4.1. 4.2. 4.3. Summary of Project Stakeholder Needs and Methods, Tools and 4.3.1. 4.3.2. 4.3.3. 4.3.4. 4.3.5. Proposed strategy to incorporate the view of vulnerable groups....... 20 4.3.6. 4.3.7. 5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING 5.1. 5.2. 6. GRIEVANCE MECHANISM 24 7.1. Summary of How SEP Implementation will be Monitored and Reported.... 30 7.1.1. 7.1.2. Indicators for Grievance Mechanism.......32 7.2.

List of the Tables

Table 1.Vulnerable Groups in the Social Impact Area	13
Table 2.Stakeholder Groups	13
Table 3.Stakeholder Engagement Plan	17
Table 4.Roles and Responsibilities of Key Actors/Stakeholders in SEP Im	nplementation
	23
Table 5.Contact Details of Afyonkarahisar Municipality	24
Table 6.Grievance Mechanism Flow Chart	29
List of the Figures	
Figure 1.The Social Impact Area of Sub-project	7
Figure 2. Nearest Facilities and Settlements	7
Figure 3.Screenshot from Afyonkarahisar Municipality Website fo	or Receiving
Grievances	25

LIST OF ABBREVIATIONS

CIMER Presidential Communication Center CSR Corporate Social Responsibility EIA Environmental Impact Assessment EHS Environment Health and Safety E&S Environmental and Social Management Plan ESF Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIS International Financial Institutions ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank WBG World Bank WBG World Bank WBG Foreigners Communication Center	Aol	Area of Influence
EIA Environmental Impact Assessment EHS Environment Health and Safety E&S Environmental and Social ESF Environmental and Social Framework ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IIFIS International Financial Institutions ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PAP Project Implementation Unit RE Renewable Energy Sub-project Sub-project Stakeholder Engagement Plan SEP Stakeholder Engagement Plan SEP Stakeholder Engagement Plan SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank World Bank Group	CIMER	Presidential Communication Center
EHS Environment Health and Safety E&S Environmental and Social ESF Environmental and Social Framework ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIs International Financial Institutions ILBANK Ilier Bankasi A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	CSR	Corporate Social Responsibility
E&S Environmental and Social ESF Environmental and Social Framework ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Management System ESMR Environmental and Social Management System ESMR Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIs International Financial Institutions ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar MunicipalIty PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	EIA	Environmental Impact Assessment
ESF Environmental and Social Framework ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIS International Financial Institutions ILBANK İller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp / 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	EHS	Environment Health and Safety
ESMP Environmental and Social Management Plan ESMS Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIS International Financial Institutions ILBANK İler Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MOEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	E&S	Environmental and Social
ESMS Environmental and Social Management System ESMR Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIS International Financial Institutions ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	ESF	Environmental and Social Framework
ESMR Environmental and Social Monitoring Report ESS Environmental and Social Standards ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIS International Financial Institutions ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	ESMP	Environmental and Social Management Plan
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ETL Energy Transmission Line GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIs International Financial Institutions ILBANK İller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 KWp/ 3000 KWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	ESMR	Environmental and Social Monitoring Report
GBV Gender Based Violence GDNP General Directorate of National Property GM Grievance Mechanism HS Health and Safety IFC International Finance Corporation IFIs International Financial Institutions IILBANK İİler Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	ESS	Environmental and Social Standards
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IFIS International Financial Institutions ILBANK İller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	HS	Health and Safety
ILBANK Iller Bankası A.Ş. LMP Labor Management Plan OEDAŞ Osmangazi Elektrik Dağıtım A.Ş. MoEUCC Ministry of Environment, Urbanization and Climate Change NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	IFC	International Finance Corporation
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NGO Non-Governmental Organizations OIP Other Interested People PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	OEDAŞ	Osmangazi Elektrik Dağıtım A.Ş.
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PAP Project Affected People PIU Project Implementation Unit RE Renewable Energy Sub-project 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	NGO	Non-Governmental Organizations
PIU Project Implementation Unit RE Renewable Energy 3180 kWp/ 3000 kWe Solar (Photovoltaic) Power Plant Project of Afyonkarahisar Municipality PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEIAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	OIP	Other Interested People
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PUMREP Public and Municipal Renewable Energy Project SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEIAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	RE	Renewable Energy
SEA/SH Sexual exploitation and abuse/sexual harassment SEP Stakeholder Engagement Plan SPP Solar Power Plant TEIAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	Sub-project	
SEP Stakeholder Engagement Plan SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	PUMREP	Public and Municipal Renewable Energy Project
SPP Solar Power Plant TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	SEA/SH	Sexual exploitation and abuse/sexual harassment
TEİAŞ Turkish Electricity Transmission Corporation WB World Bank WBG World Bank Group	SEP	Stakeholder Engagement Plan
WB World Bank WBG World Bank Group	SPP	Solar Power Plant
WBG World Bank Group	TEİAŞ	Turkish Electricity Transmission Corporation
7 1	WB	World Bank
YIMER Foreigners Communication Center	WBG	World Bank Group
	YIMER	Foreigners Communication Center

EXECUTIVE SUMMARY

The Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the "Project") aims to support the Government of Türkiye to scale-up Renewable Energy (RE) use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security.

The PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S polices and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and sub-projects financed through International Financial Institutions (IFIs).

The ESMS is aimed at ensuring systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S) risks and impacts of the projects and sub-projects financed by the International Finance Institutions (IFIs). This process will be implemented on an ongoing basis throughout their loan duration in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending IFIs (World Bank for the PUMREP). As a critical element of the ESMS, ILBANK has adopted and published an E&S Policy applicable to all ILBANK projects and sub-projects financed through IFIs.

The project to be financed under PUMREP includes generating approximately 4,940,051 kWh of electricity annually, which is enough to supply power to over 23,368 households. Throughout its 30-year operational lifespan, the project is expected to

save the municipality more than EUR 73,03 million in energy costs and prevent the release of more than CO2 emissions by over 5,954 tons annually. The project site is located in the Inaz neighborhood of the central district, which is a part of Afyonkarahisar province in Türkiye. The solar power plant project is a part of Türkiye's ambitious plan to increase the share of renewable energy sources in the country's energy mix. The project site is located on a 23-hectare land allocated by Afyonkarahisar Municipality. The solar panels used in the project are of high quality and have a lifespan of 30 years. The project was designed and constructed by a team of experienced engineers and technicians. The project developer has ensured that the project adheres to international standards of quality and safety. The plant is equipped with state-of-theart technology, including inverters, transformers, and monitoring systems. The plant is connected to the national grid which will been constructed as a part of the project.

This SEP has been formulated to ensure that sub-project affected interested parties and vulnerable groups that constitute the stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-Project and its impacts.

SEP establishes a systematic approach to stakeholder engagement that will help Afyonkarahisar Municipality to identify all stakeholders and how they will be affected by the Sub-project and ensure that the Sub-project is implemented in a participatory and community-friendly manner through building and maintaining a continuous constructive relationship with them, in particular with project-affected parties.

SEP also assesses the level of stakeholder interest and support for the Sub-project and guides the relations of the Afyonkarahisar Municipality team with the stakeholders throughout the construction and operation process, enabling stakeholders' views to be taken into account in sub-project design and environmental and social performance.

SEP is designed to ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

1. INTRODUCTION

PUMREP aims to support the Government of Türkiye to scale-up RE use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security. Afyonkarahisar Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP. Therefore, this plan is prepared to define the stakeholder engagement process including the grievance mechanism management.

The PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

The sub-project has been classified as having a moderate level of risk according to the E&S Risk Screening conducted by ILBANK in line with the ILBANK ESMS. One of the tasks under the scope of the Sub-project is the preparation of an Environmental and Social Management Plan (ESMP) and SEP in accordance with ILBANK's ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

Afyonkarahisar Municipality is responsible for stakeholder engagement activities and grievance resolution, ensuring that the sub-project is carried out in an inclusive and participatory manner. The contractor, selected through a competitive bidding process, is responsible for the construction, logistics, design, test and commissioning, and provisional acceptance of the solar plant. The supervision consultant, appointed by the World Bank, is responsible for guiding all parties involved in the sub-project, including the municipality, the contractor, and ILBANK.

This Stakeholder Engagement Plan (SEP) of Afyonkarahisar Municipality is an action plan which was prepared for the Afyonkarahisar Municipality 3180 kWp/ 3000 kWe

Solar (Photovoltaic) SPP sub-project and sets out methods for effective communication and interaction with stakeholders.

The solar power plant project with an installed capacity of 3180 kWp/ 3000 kWe belonging to Afyonkarahisar Municipality located in the İnaz district of Afyonkarahisar province. The plant will meet the energy of more than 23,368 households with 4,940,051 kWh of electrical energy production, save the municipality more than EUR 73,03 million energy costs within 30 years and prevent the release of more than 5,954 tons of CO2 per year into the atmosphere.

The ultimate purpose of this SEP is to establish and maintain constructive dialogue between sub-project owner which is Afyonkarahisar Municipality and Project Affected Parties (PAP), Other Interested Parties (OIP) and vulnerable groups that are essential for the successful management of the environmental and social impacts of the Sub-project. Afyonkarahisar Municipality is fully committed to undertaking necessary engagement activities related to sub-projects in a manner that is consistent with international good practice as outlined in next sections.

The SEP provides a roadmap for the Afyonkarahisar Municipality's engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to the environmental and social assessments, by identifying the stakeholders' concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

2. OBJECTIVE OF THE SEP

This Stakeholder Engagement Plan has been formulated to ensure that project-affected parties, other interested parties and vulnerable groups that constitute the "stakeholders" are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-Project and its impacts.

The objectives of the Stakeholder Engagement Plan of Afyonkarahisar Municipality are as follows:

- To establish a systematic approach to stakeholder engagement that will help
 Afyonkarahisar Municipality to identify all stakeholders and how they will be
 affected by the Sub-project and ensure that the Sub-project is implemented in
 a participatory and community-friendly manner through building and maintaining
 a continuous constructive relationship with them, in particular with all
 stakeholders;
- To assess the level of stakeholder interest and support for the Sub-project and to guide the relations of the Afyonkarahisar Municipality team with the stakeholders throughout the installation and operation process, enabling stakeholders' views to be taken into account in sub-project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with all stakeholders throughout the Sub-project life-cycle on issues that could potentially create an impact;
- To ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
- To provide all stakeholders with accessible and inclusive means to raise issues and grievances and allow Afyonkarahisar Municipality to respond to and manage such grievances.

Stakeholder engagement plays a critical role for the successful completion of subprojects, which has a wide stakeholder circle, from local people, vulnerable groups, public institutions and non-governmental organizations. SEP provides the framework for the stakeholder engagement and details the timing and methods of engagement with the different groups of stakeholders. SEP does not only identify the different stakeholder groups, but also identifies their needs and circumstances, and how they are being affected by the sub-project. The SEP pays special attention to identified disadvantaged or vulnerable individuals or groups, and determines how to ensure their inclusion in the stakeholder engagement activities. The SEP takes into account the main characteristics and interest of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders, while defining the interaction with all stakeholders, also explores the opportunities and risks brought by interaction with them.

SEP ensures a transparent, sensitive, and inclusive participation by defining the framework for Afyonkarahisar Municipality's dialogues across the sub-project's stakeholder groups, in an inclusive, non-discriminatory manner. Implementation of the SEP will:

- Generate a good understanding of the Sub-Project among those that will be affected in particular ensuring that host communities in the potentially affected areas will have a full understanding that the sub-project is of benefit to everybody within the Sub-project area,
- Ensure early identification of issues that may pose risks to the Sub-Project or its stakeholders.
- Ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient), and
- Establish a system for long-term communication between the Sub-Project and communities that is of benefit to all parties. This requires that the engagement strategy for the Sub-project ensure outreach to all stakeholder groups (e.g. host community), clearly informing them of the benefits from the Sub-project, and thereby reducing any social risk that misconception about the outreach of the Sub-project may cause.

SEP communication strategy vis-à-vis stakeholders also defines the mechanisms through which the stakeholders can express their concerns and transmit their

grievances, and how such concerns and grievances will be responded to and resolved in a timely and adequate manner.

The social impact area of the sub-project and nearest settlements and facilities are as follows in the Figure 1 and Figure 2.

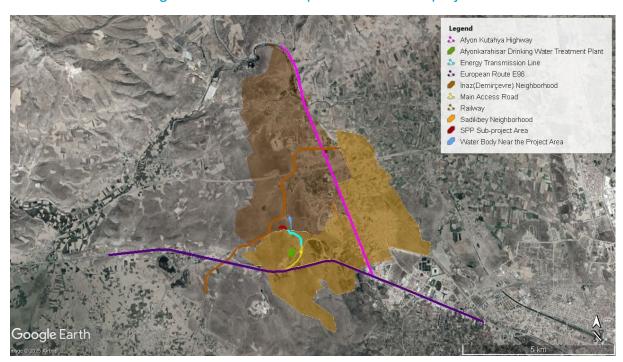
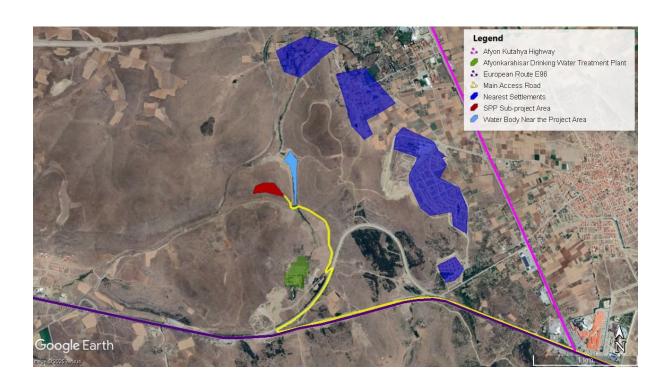


Figure 1.The Social Impact Area of Sub-project

Figure 2. Nearest Facilities and Settlements



3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

During the mapping process of the stakeholders, the nature of the Sub-project's impacts are identified, and the methods and frequencies of the relations to be built with stakeholders are formulated.

It is critical that particular efforts are given to identify disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the sub-project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an ongoing process and will need to be regularly reviewed and updated.

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 will be arranged during the sub-project cycle, carried out openly, free of external manipulation, interference, coercion, or intimidation.
- Informed participation and feedback: Information will be widely provided to all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification will be undertaken to support better communications and build effective relationships during the Project cycle. The participation process for the projects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and project implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits and the cultural sensitivities of diverse ethnic groups.
- Flexibility: Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Project's stakeholder

communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.

• In accordance with ESS 10, the Project has identified stakeholders, taking into account both project-affected parties and other interested parties, such as individuals or groups affected or likely to be affected by the project. Therefore, stakeholders have been identified and categorized as "project-affected parties" and "interested parties" (other individuals or groups that may have an interest in the project).

3.2. Project Affected Parties

A stakeholder is defined as any person, institution or group that may be affected by the Sub-project or has an interest in the sub-project and its impacts.

The term "project-affected parties" includes those likely to be affected by the subproject due to actual impacts or potential risks to their physical environment, health, safety, cultural practices, well-being or livelihoods. These stakeholders may include individuals or groups, including local communities.

Residents in the İnaz Neighborhood have been selected as project affected parties since the sub-project will be established there, and settlements are in close proximity. Particularly those residing in settlements near the sub-project area, have been identified based on a detailed impact assessment. The nearest settlement is 1 km away. Additionally, the ETL passes through parcels linked to the Sadıkbey Neighborhood, meaning this area may also experience project-related impacts. Both neighborhoods could be affected by environmental factors such as increased traffic, noise, and dust during construction, leading to temporary disturbances. Furthermore, higher human mobility might put additional strain on local infrastructure and services, including healthcare facilities, markets, and the possibility of potentially disrupting residents' daily lives.

Despite these challenges, the project may also generate benefits such as local employment opportunities and economic activity. To mitigate potential negative impacts and prevent long-term social disruptions, regular information meetings should be conducted in both neighborhoods, and an effective complaint mechanism should

be implemented. Additionally, environmental mitigation measures during the construction phase must be closely monitored.

As part of the stakeholder engagement process, local landowners have been consulted through the Sadıkbey Mukhtar, and they have been informed about the solar power plant project and its potential impacts. According to their statements, they do not expect any negative effects from the project. Additionally, they have been informed about the complaint mechanism and advised that they can report any potential issues and share their opinions with the relevant authorities.

Other facilities that could be affected include the Afyon Drinking Water Treatment Plant, which is located along the project route, and a nearby railway crossing, and artificial dam of which have been considered in the assessment.

The project affected parties, including individuals, groups and communities, who will cooperate and consult on and during the sub-project are as follows:

- İnaz Neighborhood
- Sadıkbey Neighborhood
- Sensitive Receptors (The Afyonkarahisar Drinking Water Treatment Plant, The Railway, The Artificial Dam, Nearest Settlements)

The parties that affected by the project are shown in Figure 1 as İnaz Neighborhood, Sadıkbey Neighborhood and as facility and other sensitive receptors located near sub project area in Figure 2.

3.3. Disadvantaged/Vulnerable Individuals or Groups

In the communities under potential impact of the sub-project, there will be direct stakeholders, some of whom may be vulnerable groups. Disadvantaged or vulnerable individuals or groups are those who often do not have a voice to express their concerns or understand the impacts of a sub-project, and who may have particular limitations in participating in and/or understanding the sub-project information or participating in the consultation process. Limitations may relate to language differences, lack of transportation to events, accessibility of venues, lack of understanding of a consultation process, and difficulties in accessing information. Vulnerable groups may be disproportionately affected by the adverse impacts of the sub-project.

Vulnerable individuals/groups may comprise of refugees, household head women, the disabled individuals, people with chronic illnesses or in need of special care and the people over 65 years of age. Vulnerable groups are important stakeholders, and it is a priority to find modes of engagement in terms of language, access, venue and time which will enable them to participate fully in the stakeholder engagement activities. Likewise, it is important to consider how these groups normally access information, through which media and language – and whether there are organizations which already work with them, and who can be used for outreach.

Moreover, the equal participation of disadvantaged/vulnerable/ groups in the stakeholder engagement activities of the sub-project at par with other stakeholder groups is also expected. Their participation, inputs and needs will inform sub-project design and implementation.

In the sub-project context, vulnerable individuals/groups would include:

- Disabled individuals: Construction activities can disrupt accessibility routes and restrict mobility. They may have special needs for access to participation activities. There are disabled individuals and people with chronic illnesses or in need of special care in the neighborhoods in AoI.
- People over 65 years of age: Construction activities can disrupt older people's
 daily routines and access to basic services, potentially causing discomfort or
 stress. They may have special needs for access to participation activities.
- Immigrants and Refugees: Refugees may have difficult living conditions and limited resources, making them more susceptible to the impacts of the subproject. Their legal status and lack of access to certain services can also heighten their vulnerability.
- 4. **People with chronic illnesses or in need of special care:** Construction-related activities (traffic, damage to infrastructure, etc.) can affect access to basic services and routines, exacerbate health problems or cause discomfort.
- 5. **Female head of households:** Female heads of households with special needs may have limited participation in consultations.

The table below was filled in with the information received from the Mukhtar of İnaz Neighborhood and the Afyonkarahisar Municipality.

Table 1. Vulnerable Groups in the Social Impact Area

Number	İnaz Neighborhood	Sadıkbey Neighborhood
Refugees	None	None
Disabled individuals	10	20
People over 65 years of age	200	500
People with chronic illnesses or in need of special care	None	5-6
Female head of households	20	5

3.4. Other Interested Parties

Other interested parties include individuals, groups and others who may have an interest in the sub-project because of their location, proximity to natural or other resources, or the sector or parties involved in the sub-project. This may include local government officials, community leaders, media and civil society organizations, particularly those working in or with affected communities.

Maintaining regular relationships with media stakeholders is sufficient to provide regular information at local and national level in Afyonkarahisar Province. In all cases, the media plays an important role in informing the public and building public perception of the sub-project.

Stakeholder groups within the scope of the sub-project are as follows in Table 2.

Table 2.Stakeholder Groups

Stakeholder Group		Cause of Impact/Risk	Level of Interest	Level of Influenc e
Project Affected Parties	Local communities (İnaz , Sadıkbey Neighborhoods , Nearest Settlements (Local Landowners)	Settlements that have the potential to be directly adversely affected by subproject activities due to their proximity to the sub-project site in terms of dust, noise, traffic, labor influx, land acquisition issues, etc.	High	High

	Business (The Afyonkarahisar Drinking Water Treatment Plant)	Businesses that have the potential to be directly adversely affected by subproject activities due to their proximity to the sub-project site in terms of dust, noise, traffic, labor influx, issues, etc.	Medium	High
	The railway	Potential noise, dust, and vibration from construction activities; potential disruption of railway operations during installation phases.	High	Medium
	Water body (Artificial dam)	Possible risk of water pollution from dust, air pollution, or runoff during construction; visual impact of the project on the water landscape.	High	Low
	Workers (including supply chain) to be employed for the sub-project activities	Potential risks related to labour and working conditions, etc.	High	High
Vulnerable individuals or groups	Disabled individuals;People over 65 years of age;Female head of households.	Vulnerable groups might be disproportionately affected by adverse sub-project impacts	High	High
	• NGOs	Environmental and social impacts of the sub-project (depending on NGO's field).	High	Low
Other Interested Parties	 Governmental Bodies Ministry of Industry and Technology, Ministry of Energy and Natural Resources, Afyonkarahisar District Governorship, Governorship of Afyonkarahisar, Afyonkarahisar Provincial Directorate of Environment, Urbanization and Climate Change 	A positive impact is expected with the energy generated from the subproject. Government agencies may be involved in the permitting process, land acquisition process or in organizing consultations with communities.	High	Medium

Local administrationPress AgenciesLocal Newspapers		

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of Stakeholder Engagement During Project Preparation

During the project preparation phase, limited engagement was conducted with local stakeholders within the scope of stakeholder engagement activities anticipated for projects under 10 MW. Specifically, meetings were held with the mukhtar of the social impact area, İnaz and Sadıkbey Neighborhoods, to gather feedback from the local communities and to provide information regarding the potential impacts of the project. However, a broader stakeholder engagement activity was not organized at this stage. Additional stakeholder engagement mechanisms will be developed if deemed necessary in future phases.

4.2. Stakeholder Engagement Plan

The main goals of the stakeholder engagement program and the planned schedule for the various stakeholder engagement activities are to describe at what stages throughout the Sub-project's life these activities will take place, and with what periodicity. Where decisions on public meetings, locations, and timing of meetings have not yet been made, information is provided on how people will be made aware of forthcoming opportunities to review information and provide their views.

SEP ensures preparation of an open profile of the stakeholders and clear sight of the relationships between the sub-project and stakeholders. Meeting with all of the stakeholders listed in the matrixes on the underlined subject matters at the predetermined timeline is crucially important. The frequency of the meetings can be increased when needed.

SEP in Table 3 presents the nature and level of stakeholders' interest in the subproject and the ways the engagement will be conducted, the engagement frequency and the PIU of Afyonkarahisar Municipality and the following matrix is the tabulated version of this program.

The parts analysed by the matrix are as follows in Table 3:

- Subject of Meeting/Interview identifies the subject matters that need to be discussed with the stakeholder at the predetermined frequency.
- Method of Information specifies the communication tools and ways that may be used for engagement, such as face-to-face meetings, website announcements, SMSs, and brochures, etc.
- Frequency establishes a calendar for engagement.

The responsible party/person is required to be determined by the Afyonkarahisar Municipality representatives. The Afyonkarahisar Municipality will be responsible for implementing the stakeholder engagement process even in case that actual stakeholder engagement works may be contracted to a third party.

The following stakeholder engagement program represents key characteristics, preferred notification means and specific needs for stakeholder groups.

Table 3.Stakeholder Engagement Plan

Stakeholder group	Key characteristics	Preferred notification means	Frequency	Specific needs
Directly Affected Cor	l mmunities	Houncation means		
Residents and mukhtar in affected settlement	İnaz Neighborhood Sadıkbey Neighborhood	Web site Flyers, posters Announcements Info desk at Afyonkarahisar municipality Announcements by mukhtar Press release Social media Face-to-face information meetings	-Before the construction phase started - Monthly checks can be made after construction begins. -Also, when needed (significant change occurs)	-Accessible consultation opportunities
Vulnerable groups in settlements in Aol	-Disabled Individuals -People over 65 years of age -Female head of households	 Brochures Face-to-face consultations Telephone interviews Social media Web site of Afyonkarahisar Municipality Flyers, posters Announce Info desk Brochure 	-Before the construction phase started -Monthly checks can be made after construction begins. -Also, when needed (significant change occurs)	-Transportation support to meetings -Special face to face meetings, - Sign language support during meetings.

Stakeholder group	Key characteristics	Preferred notification means	Frequency	Specific needs
Sub-project workers	-Workforce during construction and operation	Information brochuresGrievance mechanism	-Monthly	- Toolbox trainings
Facility on the Road Route of the Sub- Project Area	-Afyonkarahisar Drinking Water Treatment Plant	 Information brochures Grievance mechanism Information meetings Face-to-face consultations 	-Before the construction phase started -When needed (significant change occurs)	-Accessible consultation opportunities
Railway	-Critical and sensitive infrastructure nearby.	Official letters, meetings with railway authorities	As needed during construction phases	Clear information on construction activities and schedules, noise and vibration management measures, and risk mitigation plans.
Land owners (Near subproject area)	-Local landowners around the subproject area, mainly farmers who use their land for agricultural purposes. They may have concerns about land use, environmental impacts, and access to their properties.	Meetings through the Mukhtar, official notices, community gatherings, Written materials (brochures, letters)	Before the construction phase started -When needed (significant change occurs)	Clear communication on project impacts, assurance of continued land access, and an effective complaint mechanism
Water Body (Artificial Dam)	Managed water source for irrigation or storage; sensitive to water quality and visual impacts.	Letters, community bulletins, updates to local government	Quarterly or at major project milestones	Assurance of dust and air pollution control, water quality monitoring reports, and visual impact mitigation measures.
Directly Involved Pub	olic Administrations		L	
National Level	-Public institutions	Face to face meeting Correspondence	-Quarterly	-In accordance with the workflow
Provincial Level	-Public institutions	Face to face meetingsTelephoneCorrespondence	-Quarterly	-In accordance with the workflow
Indirectly Affected C				
All residents in Afyonkarahisar	-All residents under coverage of Afyonkarahisar Municipality services	Web siteSocial mediaFlyers, posters	-Yearly	-Accessible informing
All vulnerable groups in Afyonkarahisar	-All vulnerable groups under coverage of Afyonkarahisar Municipality services	Web siteSocial mediaFlyers, posters	-Yearly	-Accessible and appropriate informing
	ublic Administrations			<u> </u>

Stakeholder group	Key characteristics	Preferred notification means	Frequency	Specific needs
National Level	-Government authorities	Correspondence	-Yearly	-In accordance with the workflow
Provincial Level	-Government authorities	Correspondence	-Yearly	-In accordance with the workflow
District Level	-District Municipalities Mukhtars of Indirectly Affected Neighborhoods	Correspondence	-Yearly	-In accordance with the workflow
Media/Press				
Press Agencies	-Press agencies	Face to face meeting Telephone	-Yearly	-Prior notification
Local Newspapers	-Local newspapers	 Face to face meeting Telephone Press releases Interviews 	-Yearly	-Prior notification

4.3. Summary of Project Stakeholder Needs and Methods, Tools and Techniques for Stakeholder Engagement and Reporting Back

4.3.1. Public/community meetings

Following the approval of the ESMP by Afyonkarahisar Municipality, a Public Consultation Meeting will be held with the participation of the resident of İnaz and Sadıkbey Neighborhoods in the social impact area. The meeting will be held to provide information about the project, answer the questions of the local people and express their concerns, if any. This meeting will be an important step in minimizing the social impacts of the project and strengthening cooperation with the local community.

4.3.2. Media communication

Information will be widely shared through various media channels, as local media usage is prevalent among individuals of different ages and backgrounds in the communities impacted by the sub-project. These channels will include local radio and TV stations, newspapers, social media, community websites and forums, SMS and mobile notifications, public notice boards, as well as community meetings or public announcements. The municipality's communication platforms and channels will also be utilized to ensure broad dissemination of information.

4.3.3. Communication materials

Written information will be made available to the public through various communication tools and materials such as brochures, flyers, posters, etc. Afyonkarahisar Municipality will also regularly update its websites with sub-project key updates and reports on the environmental and social performance of the Sub-project. The websites will also provide information on the grievance mechanism for the Sub-project (see section 4.3.7 below). All stakeholder engagement processes will be recorded, monitored, evaluated and reported with consultation and backup documents such as participant lists, photographs, records, etc.

4.3.4. Project tours for media, local representatives

If needed, site visits or demonstration tours will be organized for selected stakeholders from media organizations or local government during all phases including construction, operation and decommissioning of the sub-project.

4.3.5. Information desks

The Information Desk at Afyonkarahisar Municipality building will provide information to local residents on stakeholder engagement activities, construction updates, contact information for complaint methods, etc. Brochures and flyers on social and environmental issues related to the various sub-projects will be available at these information desks.

4.3.6. Proposed strategy to incorporate the view of vulnerable groups

The Sub-project will take special measures to ensure that disadvantaged and vulnerable groups' (women, elder and disabled) have equal opportunity to access information, provide feedback, or submit grievances.

Vulnerable stakeholder identification is also an on-going process and will require regular review and update. Accordingly, engagement methods can be tailored to inform women, elder and disabled to understand their views and concerns in an appropriate manner. Focus group meetings, women meetings will be dedicated specifically to vulnerable groups may also be envisaged as appropriate.

4.3.7. Information disclosure

From the early stages of the sub-project lifecycle, information about the sub-project and the grievance mechanism will continue to be disclosed to the public through individual or group meetings, printed materials, and notice boards, as well as SMS and WhatsApp group messages. The current Afyonkarahisar Municipality website (https://www.afyon.bel.tr) and consultation meetings will be used to disclose sub-project documents.

The sub-project documents, including the ESMP and SEP, will be available at the Afyonkarahisar Municipality office and district municipality offices. Sub-project posters, brochures, and information related to the grievance mechanism and the sub-project will be provided in local areas such as the İnaz and Sadıkbey mukhtar's office, coffee houses, or mosques. Sub-project updates (including news on construction activities and basic environmental and social data) will also be posted on the homepage of Afyonkarahisar Municipality's website. Additionally, details about the sub-project Grievance Mechanism will be posted on the website. To enable stakeholders to submit their complaints, an electronic grievance notification system will be established via email (info@afyon.bel.tr) and a communication hotline accessible at 444 03 83. Afyonkarahisar Municipality will regularly update and maintain its website.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Resources

Afyonkarahisar Municipality will mobilize human and financial resources to implement the SEP and manage the Grievance Mechanism (GM). The SEP and GM activities will be overseen by Afyonkarahisar Municipality. As outlined in this SEP, the municipality will primarily be responsible for coordinating stakeholder engagement activities with the Contractors. The collection of complaints, inquiries, and feedback will be directly managed by the E&S Specialist of Afyonkarahisar Municipality and the Contractors.

The financial resources mobilized by Afyonkarahisar Municipality will include:

- A project-specific page on the website
- An electronic grievance database
- · A record of stakeholder engagement
- Printed materials (guidelines, brochures, posters, etc.) to be used in accordance with SEP requirements.

5.2. Management Functions and Responsibilities

Afyonkarahisar Municipality PIU is the main responsible party for the implementation of the SEP. Afyonkarahisar Municipality PIU will have designated staff responsible for SEP and GM. The roles and responsibilities of these stakeholders are summarized in Table 4 below.

Table 4.Roles and Responsibilities of Key Actors/Stakeholders in SEP Implementation

Institution	Roles and Responsibilities
Afyonkarahisar Municipality Grievance Mechanism Contact Person	 Planning and implementation of the SEP; Leading stakeholder engagement activities in close collaboration with the ILBANK PMU; Management and resolution of grievances; Consultation on specific SEP activities; Announcing the important construction activities (such as road closures and service interruptions); Reporting on implementation of SEP activities to ILBANK PMU; Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status.
ILBANK	 Monitor and control whether Afyonkarahisar Municipality fulfills its responsibilities. 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
E&S Consultant	 E&S Consultant is responsible for preparing the Environmental and Social Assessment Study Reports, i.e. ESMP and SEP, for the approval of ILBANK and WB. Taking a part in organizing the ESMP introduction meeting to be held for the public and NGOs as part of the Sub-project; and Finalizing the reports as per the concerns/opinions of the stakeholders.
OEDAŞ	Cooperating with Afyonkarahisar Municipality for the SEP in relation with construction of the Energy Transmission Line and associated land acquisition.
Contractors/sub- contractors	 Inform Afyonkarahisar Municipality on any issues related to engagement with stakeholders. Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by Afyonkarahisar Municipality. Inform ILBANK PMU and Afyonkarahisar Municipality on important construction activities (such as road closures and service interruptions) and of any issues related to their engagement with stakeholders. Maintaining contact with the Afyonkarahisar Municipality GM Focal Point for the follow up of the grievances, Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing, Informing local communities of any environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.), Developing and implementing a grievance mechanism both for the E&S performance of the sub-project and for their workforce including sub-contractors, prior to the start of works in compliance with Afyonkarahisar Municipality's GM requirements.
National Government Departments	 Participate in the implementation of some activities in the SEP; such as licenses, permits, approvals. Make available and engage with the public on the Sub-project Reports.

A tentative budget for implementing the stakeholder engagement plan will be covered by Afyonkarahisar Municipality.

6. GRIEVANCE MECHANISM

In accordance with the international requirements, a grievance mechanism will be established by Afyonkarahisar Municipality in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities and the workforce. Grievance Mechanism (GM) as per WB will be implemented by Afyonkarahisar Municipality throughout the lifetime of the sub-project including pre-construction, construction, and operation phases. Afyonkarahisar Municipality will be accessible interested parties and vulnerable and respond to all grievances (complaints, requests, opinions, suggestions) at the earliest convenience. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded. Moreover, on the basis of their contents, by Afyonkarahisar Municipality PIU and that the corrective/regulatory action to be taken is acceptable to GMCP of Afyonkarahisar Municipality PIU. Such responses to the grievances would be satisfactory for both parties and activities would be followed and the complainants would be informed on the outcomes of the corrective activities. Additionally, the grievance mechanism will be designed to allow anonymous to be addressed and handled. The Grievance Form in Annex 1 will be utilized in the subproject and allow submission of anonymous grievances. In addition, the sub-project's GM will include a channel to receive and address confidential complaints related with Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) with special measures in place.

Afyonkarahisar Municipality PIU will be responsible for building close relationships with all stakeholders. The contact detailed is given in Table 5.

Table 5. Contact Details of Afyonkarahisar Municipality

Web page	Phone	Address for Official Letter	E-mail
https://www.afyon.bel.tr	Call Center 444 03 83	Karaman Mahallesi Albay Reşat Çiğiltepe Caddesi No:11 03200 Merkez/Afyonkarahisar	info@afyon.bel.tr

Afyonkarahisar Municipality actively uses the website https://ecozum.afyon.bel.tr/WebBasvuru/sikayetformu#/ for managing complaints, suggestions, and requests from the public in a more efficient digital manner. Through this platform, users can submit their complaints and suggestions, facilitating faster communication with the municipality. Please see Figure 3.

Figure 3.Screenshot from Afyonkarahisar Municipality Website for Receiving Grievances



In addition to Afyonkarahisar Municipality communication tools, the following communication channels can be used to convey complaints:

- Points selected for grievance boxes (for worker grievances) at the construction sites and for the mukhtar of the relevant Neighborhood and/or grievance boxes,
- Direct contact with and site managers at construction sites,
- Meetings and formal/informal consultations.

If any worker and/or public stakeholders and affected groups are not satisfied with the solutions offered by the E&S Team in Afyonkarahisar Municipality PIU or have requests for a higher-level explanation, grievances / requests / suggestions can be shared at the contact addresses given below. Also, a separate grievance mechanism is provided

exclusively for workers, focusing on workplace concerns like safety, conditions, and labor rights. Workers can submit grievances confidentially to their supervisor, the HR

Department, or the E&S representative.

ILBANK has established a transparent and comprehensive GM in September 2021 in

order to receive, evaluate and address grievances pertaining to every international

project it finances, and relevant mechanism will be in place during the course of the

Sub-project. Complainants may - if they wish - submit their grievances to ILBANK as a

higher authority through the following communication tools:

• 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 for Official Letter: ILBANK Department of International Relations, GM Team

(letters must be marked as personal or confidential) Emniyet Mahallesi Hipodrom

Caddesi No:9/21 Yenimahalle/ANKARA Presidency's Communication Center: The

Presidency's Communication Centre (CIMER) has been providing a centralized

complaint system for Turkish citizens, legal persons and foreigners. CIMER will be

available to sub-project stakeholders as an alternative and well-known channel for

conveying their sub-project-related grievances and feedback directly to state

authorities.

www.cimer.gov.tr

Call Centre: 150

Phone number: +90 312 525 55 55

Fax number: +90 0312 473 64 94

Mail addressed to Republic of Turkey, Directorate of Communications

Individual applications at the community relations desks at governorates,

Ministries and district governorates

Foreigners Communication Center: The Foreigners Communication Center (YIMER)

has been providing a centralized complaint system for foreigners. YIMER will be

available to sub-project stakeholders as an alternative and well-known channel for

26

conveying their sub-project-related grievances and feedback directly to state authorities.

www.yimer.gov.tr

Call Centre: 157

• Phone number: +90 312 5157 11 22

• Fax number: +90 0312 920 06 09

Mail addressed to Republic of Turkey, Directorate of Communications

 Individual applications at the Republic of Turkey General Directorate of Migration Management

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the sub-project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016) and WB Grievance Redress Mechanism.

An English version of the grievance forms that will be filled in Turkish are available in Annex 1.

The operational flow of Grievance Mechanism for the stakeholders is as follows:

- **1.** Tools of information are prepared for grievance mechanism. Local people and stakeholders are informed. The tools are defined as follows:
 - a. Web page
 - b. E-mail address
 - **c.** Brochure
 - **d.** Public meetings
 - e. Telephone
 - **f.** Frequently Asked Questions (Brochure, web page, bulletin, etc.)
- **2.** There are multiple channels for submitting grievance and concerns. Grievances can be submitted by the following channels:
 - **a.** Telephone (Call Center and units)
 - **b.** Personal visit to Afyonkarahisar Municipality head office

- **c.** Application through the grievance boxes (installed at the Afyonkarahisar Municipality Units)
- d. Through concerned public administrations (district governorship, municipality, mukhtars of İnaz and Sadıkbey Neighborhoods)
- e. E-mail
- **f.** Meetings
- g. Through staff and local communication desk of Afyonkarahisar Municipality
- **h.** By written petition to Afyonkarahisar Municipality
- i. During site visits and miscellaneous
- j. Application by grievance forms and letters through the grievance boxed to be placed at Afyonkarahisar Municipality, ILBANK and contractor's sub-project site offices
- **3.** All the grievances received through the above channels are collected and recorded by, Grievance Mechanism Contact Person (GMCP).
- **4.** The grievances received are recorded in the database and maintained (Please see Annex 1 for template of grievance database)
- 5. Requests that require urgent remedy and/or support will be responded to and given support for within the same day, and all outstanding grievances/requests will be recorded within 2 business days, and reviewed and assessed within 10 business days, and concluded not later than 15 business days. Corrective actions will be taken to resolve the grievance.

GMCP of Afyonkarahisar Municipality prepares the draft response and submits it to the approval of the Sub-project Management.

6. For the cases relevant to sexual exploitation and abuse/sexual harassment (SEA/SH) at workplace or any potential child abuse in the sub-project site, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers. The sub-project Owner will provide training to employees and subcontractors before the construction phase begins. Behavioral codes, including compliance with rules addressing gender-based violence, sexual harassment, sexual exploitation, and abuse, will be explicitly stated in the terms of the personnel's contract. The consequences of non-compliance with these codes will be clearly outlined in the contract.

- Measurement and evaluation should be conducted at the end of the training provided to the personnel.
- **7.** A monitoring- evaluation system is established for the grievances. The monitoring process of grievances is recorded in the monitoring and evaluation system.

Table 6.Grievance Mechanism Flow Chart

Grievance Process	Requirement / Action
Submission of a complaint	Receiving the grievance by any communication channel explained above. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2days after receiving of the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the Sub-project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.")
Registration of complaint	Registering/recording through making an entry in the sample grievance register table. All the complaints will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.
Forwarding of complaint	The compliant is forwarded to relevant persons (site manager on construction sites and experts of the PIU) responsible for handling the complaint in not later than three working days upon receiving the complaint (except for any emergent complaint, which would be handled as appropriate).
Evaluation of a complaint	Evaluating the complaints within 10 working days and determining whether the complaint meets the admissibility criteria. If the complaint is not valid/not related to the project, the relevant explanation will be provided to the complainant.

Grievance Process	Requirement / Action		
	If the complaint is valid, identifying and taking corrective measures for resolving the complaint in not later than 15 working days upon receiving. If resolving the complaint would take longer, a partial response could be provided to the complainant and fill the Grievance Closeout Form.		
Response for a complaint	All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.		
	At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the Afyonkarahisar Municipality website, so that anonymous complainants is informed about their complaint and the results.		
Recording the result of a complaint	Recording the result of the complaint in register table.		
Right to Appeal	If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follow: Civil Courts of First Instance Administrative Courts Commercial Courts of First Instance Labor Courts, and		
	Ombudsman (https://ebasvuru.ombudsman.gov.tr/)		

7. MONITORING AND REPORTING

7.1. Summary of How SEP Implementation will be Monitored and Reported

Monthly summaries of complaints, queries and related incidents, together with the status of implementation of corrective/preventive actions, shall be prepared by the Contractor during the construction phase and by Afyonkarahisar Municipality during the operation phase. These summaries shall be included in the monthly ESMRs to be prepared by the Contractor during the construction phase of the subproject for submission to the Afyonkarahisar Municipality. Furthermore, the Contractor shall promptly forward the complaints to the Subproject Owner in addition to summarizing them in the monthly ESMRs. The monthly summaries/reports shall be a means of assessing both the number and nature of complaints (if any) and the ability of Afyonkarahisar Municipality and the Contractor(s) to address the complaints in a timely

and effective manner. As for incidents, the Contractor shall be responsible for promptly reporting to the Subproject Owner any unexpected events such as environmental, social and labor issues or accidents, incidents or loss of time and maintaining an incident log on site throughout the life of the subproject.

Monthly ESMRs will be prepared by the Contractor for submission to Afyonkarahisar Municipality. Quarterly ESMRs and six-monthly sub-project Progress reports will be prepared by Afyonkarahisar Municipality and submitted to ILBANK together with the Complaint Register. Six-monthly ESMRs and sub-project Progress reports will be prepared by ILBANK for submission to WB. These reports will include a summary of the sub-project's performance in health, safety, environmental and social issues management, grievance mechanism and stakeholder engagement activities conducted within the specified period. All efforts for effective implementation of the GM will be documented using forms and records in the sub-project specific SEP and will be evaluated and reported against the specified KPI targets. It should also be noted that the personal information of the complainant using the GM will remain confidential and will never be shared in these reports.

7.1.1. Indicators for Engagement with Stakeholders

- Number and location of formal and informal meetings with Direct & Indirect
 Stakeholders and Interested Groups
- Number and location of formal and informal meetings with Disadvantaged/Vulnerable groups specify which group (women, elderly, disabled), number of men and women that attended each of the meetings above
- Number of local and refugees attending each of the meetings above
- For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Sub-projects environmental and social management system.

Minutes of meetings of formal meetings and summary note of formal and informal meetings will be annexed to this SEP and the environmental and social quarterly reports as evidence.

7.1.2. Indicators for Grievance Mechanism

- Number of grievances received in reporting period
- Number of grievances received from stakeholders, and sorted and analyzed according to category of grievance,
- Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance.

7.2. Reporting Back to Stakeholder Groups

During the Sub-project's development and construction phases, the construction contractors will prepare brief monthly reports on environmental and social performance for Afyonkarahisar Municipality Management which will include an update on implementation of the stakeholder engagement plan and include indicators in this section. The monthly reports will be shared with ILBANK which will report quarterly to World Bank.

Afyonkarahisar Municipality's Social Affairs Manager will report back to stakeholder groups, primarily through public meetings in sub-project affected municipalities and/or Neighborhoods. Minutes of meetings will be shared with the participants during subsequent public meetings. The summary will be published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data. Feedback received through the GM will be responded to in writing and verbally. Key sub-project updates will be posted on Afyonkarahisar Municipality's website.

ANNEXES

Annex 1. Sample Grievance and Grievance Close Out Form

Grievance Form

Turkish Version will be used at the SPP Site

Reference No	
Name – Surname The complainant shall hold the right to remain anonymous. Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information	
Please mark how you wish to be contacted	Please provide details for your preferred communication
E-mail	
Telephone	
Mail	
Other	
Province/Town/Settlement	
Date	
Category of the Grievance	
On assets/properties impacted by t	he Sub-project
2. On infrastructure damages (roads,	sewage system or water resources etc.)
On decrease or complete loss of so	ources of income
On environmental issues	
5. On employment process	
6. On traffic, transportation and other	risks
7. On Inappropriate behavior	
8. Other (Please specify):	
Description of the Grievance What did hap of the problem? What would you like to see happen to res	open? When did it happen? Where did it happen? What is the result
That would you like to doe happen to les	

Signature: Date:

Grievance Close Out Form

Grievance closeout number:			
Define immediate action required:			
Define long term action required (if necessary):			
Compensation Required?	[]YES	[] NO	
CONTROL OF THE REMEDIATE AC	I TION AND THE DECISION		
Stages of the Remediate Action	Deadline and Responsible Institutions		
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
COMPENSATION AND FINA	L STAGES		
	signed by the compla	inant after s/he receives th nediated.	
Notes:			
Name-Surname and Signature of the Complainant Title-Name-Surname and Signature of the Representative of the Responsible Institution/Company			
Date/			

Grievance Database

Date of Grievance	Name of Grievance Holder	Subject of Grievance	Corrective Action	State of Grievance

CONSULTATION FORM

MEETING DE	TAILS					
Interviewed Entity				Mode of Communication □ Telephone □ Face-to-face □ Web site □ Other		
Name-Last Name of the Interviewee						
Telephone						
Address						
Email						
Type of Stakeholder						
Government organization	Private Enterprise	Professional / University	Chamber	NGO	Industry	Media
Meeting Cont	ext					
Sub-project-re	elated question	s:				
Sub-project-related concerns/feedback:						
Responses to	the views prov	ided above				