
DÜZCE MUNICIPALITY DIRECTORATE OF WATER AND SEWERAGE

DÜZCE (CENTRUM) WATER SUPPLY PROJECT - PHASE 1



STAKEHOLDER ENGAGEMENT PLAN (SEP)



NOVEMBER 2024

ANKARA



DÜZCE (CENTRUM) WATER SUPPLY PROJECT - PHASE 1 STAKEHOLDER ENGAGEMENT PLAN (SEP)

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LIST OF ABBREVIATIONS

AoI	Area of Influence
CIMER	Presidency's Communication Centre
DM	Düzce Municipality
DSI	General Directorate of State Hydraulic Works
DWTP	Düzce Water Treatment Plant
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Reports
ESS	Environmental and Social Standards
GBV	Gender Based Violence
GM	Grievance Mechanism
GRS	Grievance Redress Service
KPI	Key Performance Indicators
OHS	Occupational Health and Safety
PAP	Project Affected People
PIU	Project Implementation Unit
PMU	Project Management Unit
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TEFWER	Türkiye Earthquake, Floods, and Wildfires Emergency Reconstruction
WB	World Bank
YIMER	Foreigners Communication Centre

EXECUTIVE SUMMARY

The Türkiye Earthquake, Floods, and Wildfires Emergency Reconstruction (TEFWER) Project, led by ILBANK in collaboration with the World Bank (WB), aims to address urgent infrastructure repairs and enhance disaster preparedness and climate adaptation in municipalities across Turkey. The "Düzce (Centrum) Water Supply Project – Phase 1" (referred to as "the Sub-project") is a critical component falling under TEFWER Component 1 - Green and Resilient Rehabilitation, Reconstruction, and Construction of Municipal Infrastructure.

Düzce Province, marked by high-risk earthquakes and significant fault lines, has witnessed disasters necessitating urgent infrastructure intervention due to population growth and rapid urban development. The proposed Sub-project seeks to alleviate the strain on drinking water and sewage systems caused by urban expansion, aiming to renew the existing network and bolster resilience.

Scheduled for completion in the second half of 2026, the Sub-project's construction period spans 24 months, with a planned 30-year operation period. Notably, no land acquisition or resettlement is required, and road crossings will be executed via horizontal borings. Additionally, a Stakeholder Engagement Plan (SEP) has been developed to ensure meaningful engagement and information disclosure, aligning with WB Environmental and Social Framework and Turkish legislation.

The Sub-project's objectives encompass enhancing urban resilience, reducing water losses, and upgrading infrastructure to meet growing demands. It aims to address the operational challenges faced by Düzce Municipality (DM) due to population influx and aging infrastructure, ensuring effective service delivery amidst increasing urbanization.

Given Düzce Centrum's status as a rapidly developing urban centre with 76 neighbourhoods and a burgeoning population, the Sub-project's implementation emerges as a pressing necessity. With adherence to environmental and social standards and proactive stakeholder engagement, the Sub-project seeks to catalyse sustainable development, fortify infrastructure, and enhance the resilience of Düzce Centrum's water supply system.

1. INTRODUCTION/SUB-PROJECT DESCRIPTION

İLBANK, in collaboration with the World Bank (WB), is implementing the Turkey Earthquake, Flood and Wildfire Emergency Reconstruction (TEFWER) Project, which aims to support municipalities in emergency infrastructure repairs and improve disaster preparedness and climate adaptation. TEFWER Project includes components such as green and resilient rehabilitation, technical assistance, project management and emergency response component. “Düzce (Central) Water Supply Project - Phase 1” (hereinafter referred to as the ‘Sub-Project’) is included within the scope of TEFWER Component 1 - Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure, with Düzce Municipality as the Sub-Project Owner, serving 76 neighbourhoods and a population of 259,527 in Düzce Central.

Düzce Province, which is prone to high-risk earthquakes and major fault lines, has experienced disasters due to increasing population and rapid development, making the Subproject necessary. The proposed Subproject aims to address the pressure on the drinking water and sewerage systems resulting from the growth of the city and to upgrade the existing network and increase resilience.

The Subproject is divided into two phases, with Phase 1 focusing on the installation of DMAs and ancillary structures.

The Subproject is outside the scope of the national Environmental Impact Assessment (EIA), but the Subproject is subject to TEFWER's ESMF. Construction is expected to last 24 months, to be completed in the second half of 2026, and an operational period of 30 years is planned. The proposed potable water network lines do not require private land as they only run along public roads. No land acquisition or resettlement will be required, and road crossings will be made through horizontal borings in line with the permission obtained from the General Directorate of Highways.

In addition, the Stakeholder Engagement Plan (SEP) for the Düzce Water Supply Project Phase 1 Subproject prepared by 2U1K Engineering and Consultancy Inc. for the DM provides guidance to the DM on building constructive relationships, improving environmental and social performance, and ensuring meaningful engagement and knowledge transfer to stakeholders. The SEP is prepared in accordance with the WB Environmental and Social Framework, including Operational Policies, TEFWER's Environmental and Social Management Framework and Turkish legislation. It is a living document that is regularly monitored, reviewed and updated throughout all Subproject phases.

This SEP includes (i) identification of stakeholders for the subproject, (ii) analysis of stakeholder engagement with the subproject, (iii) details of consultation methodologies, (iv) activities undertaken to date and planned for the future of the subproject, (v) details of the

process for managing stakeholder concerns and grievances and describes how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

2. OBJECTIVE/DESCRIPTION OF STAKEHOLDER ENGAGEMENT REPORT

Sub-project location is Düzce Province Centrum. Düzce is located in the Western Black Sea Region of Türkiye and surrounded by Black Sea, Zonguldak, Bolu and Sakarya Provinces. After the earthquake disaster in 1999, Düzce gained “Provincial Status” in December 1999. The total area of Düzce province is 2,492 ha.

The Sub-project Area is various streets and avenues of Düzce Centrum.

The current water supply for Düzce's central area relies on the Uğursuyu Regulator and Düzce Water Treatment Plant (DWTP), situated 7 km away in Beyköy Municipality. The DWTP utilizes conventional methods, including chemical dosing, coagulation, flocculation, sand filtration, and disinfection. Unfortunately, recent flood damage has prompted the initiation of a renewal project by the General Directorate of State Hydraulic Works (DSI) for Uğursuyu regulator, transmission lines, and the DWTP. The existing water distribution network, established in the 1990s with cast iron, PVC, and AC pipes, underwent renewals after the 1999 Düzce earthquakes, using PE pipes under ILBANK's coordination. However, subsequent expansions and renewals by the DM lacked a comprehensive plan, leading to frequent pipe bursts, breakages, and high-water losses. Operators have identified issues such as vertical cracks, likely caused by improper storage or installation techniques. In addition to network lines, the transmission lines also require renewal. First sewerage system and stormwater system of Düzce centrum was planned and constructed in 1980's. Afterwards, additions are done by the Municipality with the development of the city. Although the sewer network of Düzce city centre was damaged after the earthquakes and floods, it continues to function with the additional installations done.

Among whole short- and long-term infrastructural needs of Düzce Centrum, “Düzce (Centrum) Water Supply Project” is identified as urgent, eligible, and proposed to be funded by World Bank (WB) as short-term investment.

The Sub-project consists of four (4) components:

Component 1: Green and Resilient Rehabilitation, Reconstruction and Construction of Municipal Infrastructure and Actions to Strengthen Municipal Resilience

- a) Reduced urban flooding through investment in resilient and climate-change sensitive stormwater systems,
- b) Increase emergency response capacity within municipalities for flood, wildfire and other disasters,
- c) Restored and improved resilience of water and wastewater services.
- d) Resilient transport and evacuation routes,

e) Municipality Capacity Building Activities.

Component 2: Technical Assistance to Support Green, Resilient and Inclusive Cities

Component 3: Project Management and Operations

Component 4: Contingent Emergency Response Component

The Sub-project's construction works are expected to last 24 months and be completed in September 2027. The economic life of the buildings is predicted as 40 years, machinery-equipment economic life of 15 years, and vehicles as 15 years.

The activities under this Sub-project are not included in Annex-I and Annex-II according to the Turkish EIA legislation, and therefore the Sub-project is considered as out of scope of this legislation.

Within the scope of TEFWER, Environmental and Social Standards (ESS) ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8, ESS9 and ESS10 are followed. This SEP is prepared in compliance with ESS10. After the ESMP of the sub-project is completed, it is planned to hold a stakeholder consultation meeting within the scope of ESS10, covering the stakeholders in the neighbourhoods within the sub-project impact area.

2.1 Purpose and Requirements of the Sub-Project

General objective of the proposed Sub-project is support of the DM to better respond to significant increase in demands for municipal services, that has risen from the increasing population and current insufficient infrastructure that has seriously affected from the earthquake and flood disasters occurred in recent years.

Proposed Component covers measures for renewal of water distribution network and auxiliary structures of network and specific objectives of proposed Component are; i) ensure effective operation of the whole water supply system till design horizon and increase service quality levels in means of hydraulic requirements; ii) Renewal of existing network which is hydraulically insufficient and consists asbestos pipes that has already completed economic lifetime; iii) Renewal of existing pump lines, that has apparent leakage problems and frequent breakdowns which increase water losses; iv) Minimization of water losses and non-revenue water ratios that has currently reached to more than 50% of non-revenue water and compliance with Türkiye's "Regulation on Control of Water Loss in Water Supply and Distribution Systems".

After gaining "province" status in year 1999, rapid development of the City, expansion of Düzce Centrum borders and increase in population caused difficulties in effective operation of the whole Centrum's infrastructure. In addition, according to the population projections, the central population of Düzce Centrum will continue to increase in the following years by

showing acceleration. Thus, implementation of the Project including the Sub-project has become a necessity.

2.2 Sub-Project Location

The Sub-project will be implemented in Düzce Centrum, which has 76 neighbourhoods.

Since the Sub-Project is an infrastructure project, it covers 76 neighbourhoods in Düzce Centrum. According to 2023 TURKSTAT data, the population of Düzce Centrum is 259,527 in total, 131,787 females and 127,740 males. The table below shows the names and populations of the neighbourhoods within the scope of the sub-project.

Table 1. List of Düzce Centrum Neighbourhoods and Populations

	Neighbourhoods	2021	2022	2023
1	Ağaköyü	4,060	4,152	4,159
2	Akınlar	1,603	1,721	1,888
3	Akpınar	528	515	529
4	Akyazı			402
5	Arapçiftliği	2,094	2,347	2,599
6	Aziziye	10,522	10,682	10,886
7	Azmimilli	7,850	7,753	7,608
8	Bahçelievler	4,650	4,827	4,748
9	Ballar	228	228	268
10	Beyciler	10,129	10,932	10,879
11	Beytepe	2,009	2,093	2,238
12	Burhaniye	3,009	2,976	2,758
13	Çakırlar	961	958	981
14	Camikebir	1,408	1,379	1,322
15	Çamköy	2,222	2,291	2,270
16	Çamlievler	3,686	3,696	3,711
17	Çavuşlar	2,136	2,212	2,273
18	Çayırtarla	8,145	8,149	292
19	Çay	233	245	8,057
20	Cedidiye	3,764	3,586	3,536
21	Çiftepınarlar	1,801	1,780	1,728
22	Cumhuriyet	812	831	892
23	Cumhuriyet	2,873	3,030	3,047
24	Darıcı	4,831	5,063	5,059
25	Dedeler	318	337	361
26	Değirmenbaşı	819	806	811
27	Demetevler	2,405	2,416	2,424
28	Derelitütüncü	3,149	3,249	3,418
29	Dokuzpınar	233	228	296
30	Esentepe	3,808	3,774	3,776
31	Fatih	1,476	1,608	1,656
32	Fevziçakmak	4,849	5,185	4,229
33	Gökçe			664
34	Güzelbahçe	6,161	6,047	5,985
35	Hamidiye	7,593	7,642	7,455
36	İstiklal-	681	702	718
37	Kabalak			975
38	Karaca Hacımusa	4,928	5,156	5,188
39	Karaca	4,021	4,095	4,064
40	Kazukoğlu	1,219	1,348	1,573
41	Kirazlı			702

	Neighbourhoods	2021	2022	2023
42	Kiremitocağı	3,525	3,595	3,322
43	Koçyazı	15,128	15,499	15,453
44	Körpeşler	5,288	5,659	6,026
45	Kültür	830	830	844
46	Kültür	7,070	6,889	6,542
47	Kuyumcuhaliali	368	448	588
48	Mamure			479
49	Mergiç	854	945	1,068
50	Nalbantoğlu	1,072	1,164	1,189
51	Nusrettin	4,549	4,500	4,385
52	Orhangazi	3,223	3,667	4,023
53	Otluoğlu			1,985
54	Ozanlar			608
55	Sallar	1,024	1,042	1,054
56	Sancaklar	3,761	3,798	3,680
57	Sarayyeri	569	579	617
58	Şehit Bayram Gökmen	2,681	3,139	3,279
59	Şehit Hüseyin Kıl	840	825	816
60	Şehit Kemal Işıldak	687	578	615
61	Şehit Murat Demir	1,959	2,537	2,834
62	Şekerpınar	676	686	726
63	Şerefiye	3,443	3,424	3,235
64	Şıralık	1,951	1,932	2,006
65	Soğukpınar	827	841	852
66	Taşköprü			722
67	Terzialiler	594	583	583
68	Tokuşlar	543	549	556
69	Uzunmustafa	6,523	6,388	5,901
70	Yahyalar	1,515	1,703	1,751
71	Yazlık	928	913	1,006
72	Yeni	646	669	680
73	Yeni	1,813	1,906	1,751
74	Yeşilköy	534	525	550
75	Yeşiltepe	2,616	2,693	2,709
76	Yukarı Yahyalar	306	308	334

Based on the environmental, social, and public/occupational health and safety risks/impacts that will potentially occur during the construction phase of the Sub-project, the area of influence (Aoi) has been designated as 100 m in this context (Figure 2), Düzce Centrum's 76 neighbourhoods are the settlements within the Aoi, while during the operation phase, the Sub-project will serve the entire city. Since the Sub-Project will be implemented in the neighbourhoods of Düzce Centrum, local businesses and public places may be affected by construction activities. The area where the physical impacts and community health and safety impacts of the sub-project will be mainly observed is limited to 100 m. However, since the sub-project will affect the entire Düzce Central District, the number of neighbourhoods to be affected covers all neighbourhoods in the district. In order to manage these impacts, local business owners will be notified 3 days prior to the construction activities. Working hours of construction activities will be organized according to shopping hours, religious and national holidays and the rights of local business owners. All construction works to be carried out within the scope of the Sub-Project will thus avoid disruptions on economic activities due to the construction in city centre. During the life of the Sub-project, the Aoi can be expanded by experts who will be in the implementation unit of the Sub-project and will participate in

monitoring studies. Complaints from stakeholders will be considered in expanding the AoI. The location of the Sub-project Area, and designated AoI are presented in Figure 1 and Figure 2.



Figure 1. Location Map of the Sub-Project Area

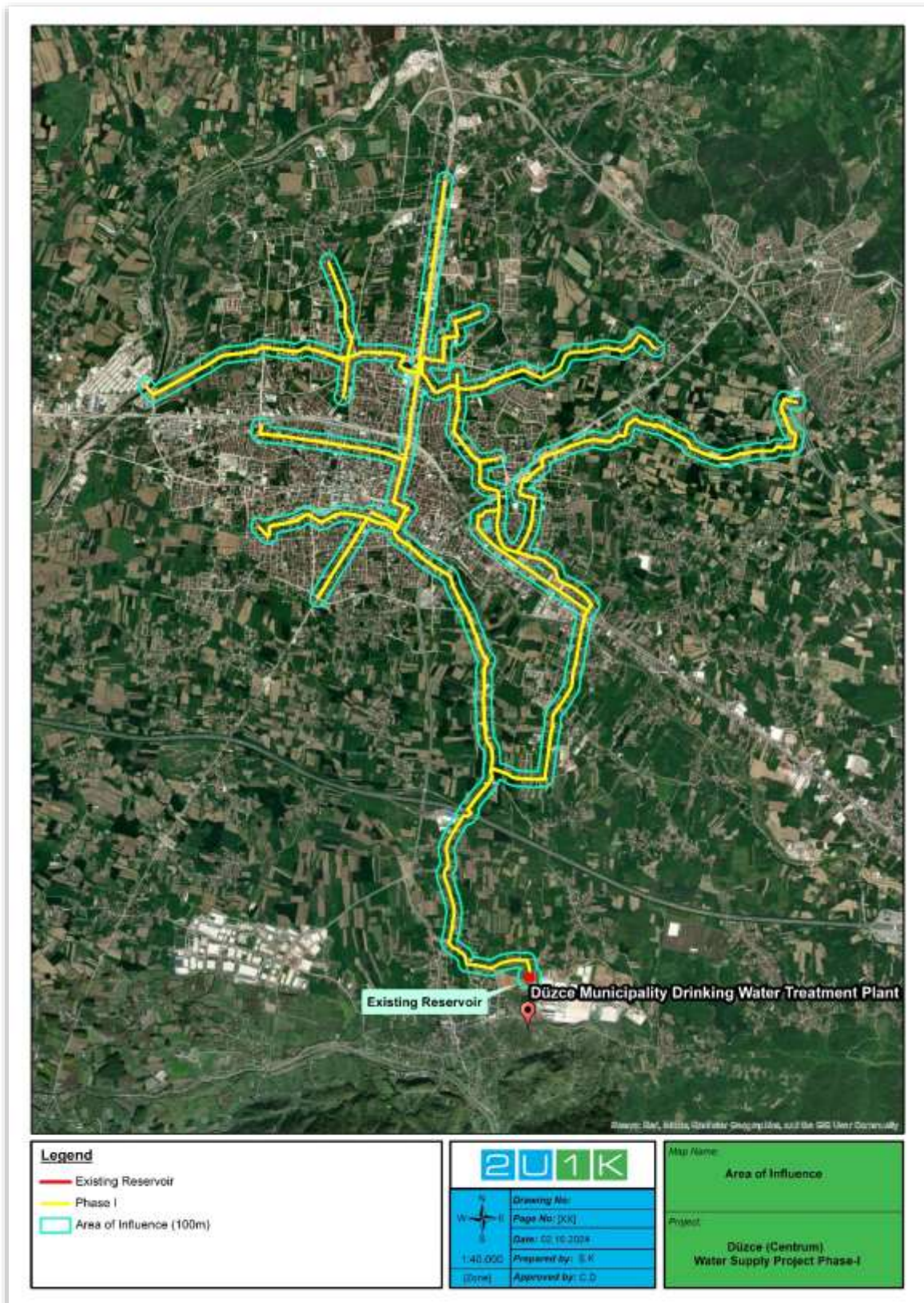


Figure 2. The Location of the Sub-Project Area, and Designated AoI

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

This section summarises the methodological framework for the Stakeholder Engagement Plan (SEP), relevant affected groups, and disadvantaged/vulnerable groups.

- The objectives of SEP according to Environmental and Social Standard 10 (ESS10) of the World Bank are listed below. **Stakeholder Engagement:** Engage stakeholders in a structured and continuous dialogue, ensuring their input and feedback are incorporated throughout the project lifecycle.
- **Information Disclosure:** Ensure transparent communication of project-related information to all stakeholders, including the purpose, nature, scale, and potential impacts of the project.
- **Consultation:** Conduct meaningful consultations with stakeholders, particularly affected communities, to understand their perspectives and address their concerns.
- **Grievance Redress Mechanism:** Establish accessible and responsive mechanisms for stakeholders to express grievances and seek resolutions.
- **Inclusion:** Promote the inclusion of vulnerable and disadvantaged groups in the engagement process to ensure their voices are heard and their needs are addressed.
- **Monitoring and Reporting:** Implement mechanisms for regular monitoring and reporting of stakeholder engagement activities and their outcomes.

3.1 Methodology

The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“affected parties”) or have an interest in the Sub-project (“other interested parties”).

It is important that particular effort be made to identify any 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 on-going process and will require regular review and update.

3.2 Affected Parties and Other Interested Parties

A stakeholder is defined as any person, organisation or group that may be affected by the Sub-project or has an interest in the Sub-project and its impacts. Stakeholder engagement is considered a critical element in the Sub-project. It can significantly influence the Sub-project's success and sustainability. Engaging stakeholders allows for a more effective Sub-project design and implementation by considering the needs and concerns of local communities. Moreover, stakeholder participation helps ensure the Sub-project is more readily accepted by the community, enhancing its long-term success. It is essential to exert special effort in identifying disadvantaged and vulnerable stakeholders who may be disproportionately or

differently affected by the Sub-project or may face difficulties in participating in development processes.

The identification of stakeholders is an ongoing process that requires regular review and updates. Different issues are likely to concern different stakeholders. Therefore, stakeholders are grouped according to their connection to the Sub-project. Understanding a stakeholder group's connections to the Sub-project helps identify key objectives of engagement. A SEP has been prepared for this Sub-project, identifying Sub-project stakeholders, their nature of their connection to the project and determination of the best engagement methods for consultations on the Sub-project. Affected and interested stakeholders (including vulnerable individuals/groups) are defined in Chapter 4 to identify which stakeholders will be directly or indirectly - positively or negatively - affected ("affected parties") or have an interest in the Sub-project ("other interested parties").

Table 2. Stakeholder Groups

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/Interest	Affected Party	Interested Party
Lender				
<ul style="list-style-type: none"> ▪ ILBANK ▪ World Bank 	Direct Impact	Sub-project Development, Implementation and Employment		√
Sub-Project Owner				
<ul style="list-style-type: none"> ▪ Düzce Municipality ▪ Contractors and Employees. 	Direct/Positive Impact	Sub-Project Development, Implementation and Employment	√	
Government / Authorities				
<ul style="list-style-type: none"> ▪ Governorship of Düzce, ▪ Düzce City Health Authority, ▪ Directorate General for State Hydraulic Works, ▪ Düzce Provincial Directorate of Environment, Urbanization and Climate Change, ▪ Düzce Directorate of Culture and Tourism, ▪ Regional Board of Protection of Cultural Heritage No. I, ▪ Regional Board of Protection of Cultural Heritage No. II, ▪ Düzce Provincial Directorate of National Education 	Indirect/Positive Impact	Relation of the Sub-project with Healthcare, Environmental and Social institutions during construction and operational phases		√
Municipalities				

Stakeholder Groups	Stakeholder Type			
	Type of Impact	Cause of Impact/Interest	Affected Party	Interested Party
<ul style="list-style-type: none"> Municipality of Düzce, 	Direct/Positive Impact	Sub-Project Development, Implementation and Employment	√	
Neighbourhood				
<ul style="list-style-type: none"> All neighbourhoods in the Düzce Centrum (76 Neighbourhoods: Table 1) 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
Businesses				
<ul style="list-style-type: none"> Businesses within the Sub-project Area 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
NGO				
<ul style="list-style-type: none"> Düzce Animal Protection Association Nature, Animal, Human: All Life Association Düzce Environmental Education, Culture and Social Solidarity Association Düzce Women's Solidarity Association 	Indirect Impact	The pollution load of the discharged river will be reduced.		√
Vulnerable/Disadvantaged Individuals or Groups				
<ul style="list-style-type: none"> Children, People who are over 65 years of age, People who have chronic disorder or need special care, Disabled people, Refugees/Immigrants. 	Direct /Negative Impact	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
Media				
<ul style="list-style-type: none"> International, national, and local media 	Indirect Impact	Informing the public		√

The total population of 76 neighbourhoods of Düzce Centrum within the sub-project impact area is 259,527. Within this population, there are denominators that we can characterize as affected and interested. Detailed information about the stakeholders identified for the Sub-Project is given in Table 3 and Table 4 **Hata! Başvuru kaynağı bulunamadı..**

3.3 Disadvantaged/Vulnerable Individuals or Groups

Vulnerable groups refer to persons who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more likely to be adversely affected by the Sub-project impacts and/or more limited than others in their ability to claim or take advantage of Sub-project benefits. Such Individuals or groups may also be more likely to be excluded from/unable to participate fully in the consultation process. Therefore, the Düzce Municipality and the Contractor, will apply provisions for assisting disadvantaged or vulnerable individuals to fully participate in the stakeholder engagement process. The sources of main impacts on the vulnerable people in the area are identified as traffic intensity, noise, dust emissions and employment opportunities.

Specifically identified disadvantaged/vulnerable groups given below:

- Children
- People over 65 years of age
- People with chronic illnesses or in need of special care
- Disabled people
- Refugees/Immigrants

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1 Summary of Stakeholder Engagement Done During Sub-Project Preparation

Currently, Düzce Municipality (DM)'s communication and consultations with institutions continue, but no stakeholder engagement has been organised yet.

4.2 Summary of Sub-Project Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement

A range of tools will be utilized for stakeholder engagement under this Sub-project. Stakeholder engagement will utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Sub-project. The Sub-project will use the following methods for interacting with stakeholders:

- Informal/formal face-to-face or online meetings with affected communities and other stakeholders – can be the main form of consultation throughout the lifetime of the Sub-project. Stakeholders will be informed about these consultation meetings by telephone, brochures, posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties ten (10) days in advance.
- Focus group meetings with affected communities and other stakeholders – can be a form of engagement that will support negotiations throughout the life of the Sub-project. It will also provide a suitable environment for stakeholders to express their views.
- English or Arabic interpreters will be available at the Stakeholder Engagement Meetings, if needed.
- Through the DM's website, phone number and short message service (SMS) – It is a public website created for announcements, documents, reports, etc. – The ESMP and SEP documents prepared for the Sub-project will be published in English and Turkish via the Sub-project website. Information on the application of the Grievance Mechanism (GM) created by the DM will be also announced on the website together with the contact details of the GM responsible person. At the same time, all up-to-date information about the Sub-project will be made available to the public via the website.
- Written materials – Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the Sub-project. – Materials will provide information about the Sub-project and inform Stakeholders about all communication methods and stakeholder engagement tools created for the Sub-project.

- GM – will be open to access of both directly affected and interested stakeholders. A mechanism has been and will continue to be widely disclosed to the affected public.
- Media promotions: Throughout the life of the Sub-project, information disclosure and contact information will be promoted through local and national newspapers and the social media accounts of the DM.
- It is planned to minimize the potential impacts of the activities to be carried out during the construction period of the Sub-Project through transparent and solution-oriented communication with stakeholders and sensitive receptors (hospitals, schools, mosques, etc.).

The traffic density that may occur due to the construction activities to be carried out within the scope of the Sub-Project will be tried to be eliminated by alternative roads within the city. In addition, the stakeholder consultation meeting will also take into account the stakeholders' suggestions for solutions to possible traffic congestion. A stakeholder consultation meeting will be held before the construction phase of the Sub-project and also an additional stakeholder consultation meeting will be planned,

- If there is a recurring grievance on a specific issue,
- If there is a major change regarding the Sub-project,
- If there is an intense impact foreseen by the DM,
- If there is extra intensive work in the construction.

All kinds of notifications or complaints from stakeholders during informal/official face-to-face or Internet meetings will be recorded for processing in the mechanism and evaluated within the process of the grievance mechanism. The days and hours of the meetings will be arranged in consultation with the stakeholders, and the highest possible participation will be aimed at. A shuttle will be arranged for stakeholders to come to the meetings when necessary, or the responsible people will be at the stakeholders' location for face-to-face meetings. [Table 3](#) presents stakeholders needs within the scope of the Sub-project.

Table 3. Sub-Project Stakeholder Needs

Community	Stakeholder Group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, childcare, daytime meetings)
Municipality	▪ Düzce Municipality	Implementation unit	Turkish	Written information, phone, e-mail, face to face	Be aware of Sub-project phases
All neighbourhoods in the Düzce Centrum (76 Neighbourhoods)	▪ Neighbourhoods' residents	Target group of the Sub-project	Turkish	Written information, phone, face to face	Be aware of Sub-project phases, Transportation

Community	Stakeholder Group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, childcare, daytime meetings)
Vulnerable/ Disadvantaged Groups	<ul style="list-style-type: none"> ▪ Children, ▪ People who are over 65 years of age, ▪ People who have chronic disorder or need special care, ▪ Disabled people, ▪ Refugees/Immigrants 	Individuals with the potential to be more affected by Sub-project work	Demanded Language	Written information, phone, face to face	Be aware of Sub-project phases, Translator, Transportation
Businesses	<ul style="list-style-type: none"> ▪ Businesses within the sub-Sub-project Area 	Businesses around the Sub-project Area	Turkish	Written information, phone, e-mail, face to face, social media,	Be aware of Sub-project phases
NGO's	<ul style="list-style-type: none"> ▪ Düzce Animal Protection Association ▪ Nature, Animal, Human: All Life Association ▪ Düzce Environmental Education, Culture and Social Solidarity Association ▪ Düzce Women's Solidarity Association 	Environmental and social protection NGOs within the project area.	Turkish	Written information, phone, e-mail, face to face, social media,	Be aware of Sub-project phases
Local Media	<ul style="list-style-type: none"> ▪ Local media organs in Düzce Province 	Delivering news to local people in Düzce Province	Turkish	Written information, phone, e-mail, face to face, social media,	Be aware of Sub-project phases

Consultation and information disclosure strategy presented in Table 4. **Hata! Başvuru kaynağı bulunamadı.**

Table 4. Consultation and Information Disclosure Strategy

Sub-Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target Stakeholders	Responsibilities
Construction	Traffic safety	Stakeholder meeting, headman meeting	Two (2) days before possible traffic impact, whenever necessary during the construction	Communities (76 neighbourhoods, Government/Authorities)	Consultation about traffic safety and measures adopted by the Sub-project
Construction	Ensuring safety in emergencies	Stakeholder meeting, headman meeting	Whenever necessary during the construction	Communities (76 neighbourhoods, Government/Authorities)	Introducing emergency authorized person, contact information
Pre-Construction	Start and end dates of the project	Stakeholder meeting, headman meeting	Before construction	Communities (76 neighbourhoods)	To inform the communities about the beginning and end of the construction works
Pre-Construction	ESMP, SEP and GM to be published	Website, stakeholder meeting	Before construction	Communities (76 neighbourhoods)	Informing communities about the ESMP and SEPs written for the project, as well as the GM prepared for the project
Pre-Construction	Identification of disadvantaged/sensitive groups	Stakeholder meeting	Before construction	Communities (76 neighbourhoods)	Identifying disadvantaged/vulnerable groups through one-to-one communication with local people
Pre-Construction	To learn the expectations and demands of the disabled from NGOs and to consider them in Sub-project design	Face to Face Meeting	Before Sub-project construction period	Associations / Non-Governmental Organizations	Consultations to take place before construction begins
Construction	Traffic management plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities (76 neighbourhoods,	Providing information about traffic management

Sub-Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target Stakeholders	Responsibilities
Construction	Receiving wishes and complaints of disadvantaged/sensitive groups about the project	Stakeholder meeting	Whenever necessary during the construction	Communities (76 neighbourhoods,	Receiving the wishes and complaints of disadvantaged/sensitive groups and intervening in relevant issues
Construction	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities (76 neighbourhoods,	Providing information for emergencies
Operation	Listening to the needs and problems identified by the NGO's, developing joint solution strategies, taking action to improve and consulting to ensure that the Sub-project can be more effective	Face to Face Meeting	Regularly throughout the operating period.	Associations / Non-Governmental Organizations	Consultations to take place through Sub-project operation phase
Operation	Ensuring safety in emergencies	Stakeholder meeting, headman meeting	Whenever necessary during the operation	Communities (76 neighbourhoods,	Introducing emergency authorized person, contact information
Operation	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary	Communities (76 neighbourhoods,	Providing information for emergencies

4.3 Stakeholder Engagement Plan

Stakeholders may have different needs, and it should be taken into account that each stakeholder's preferred method of accessing information will be different.

The GRM to be established for the Sub-project will guide the DM in managing the stakeholder participation process. Grievances may be an indication of increased concern from stakeholders. Stakeholder engagement activities will be recorded through the consultation

form included in the SEP, and consultations will be initiated before the Sub-project's construction period.

Specific personnel will be assigned by the DM, the Sub-project Owner, to implement and manage the Stakeholder Engagement Plan (SEP) and GRM. The expert to be assigned may be personnel who meets the appropriate qualifications within the existing organizational structure of the DM or may require new employment. The final responsibility for the implementation of the SEP belongs to the DM.

The DM will keep the following information up to date and accessible throughout the construction and operation phases and will provide information regarding the developments and implementation of the Sub-project:

- Key Sub-project phases and schedules (e.g. obtaining permits, starting construction or operational activities, construction schedule, etc.),
- Any disruption related to the Sub-project (e.g. Road closures, access, and infrastructure disruptions)
- Important consultations/meetings with potential consequences that may affect the community and local people, and
- Environmental, health and safety performance (e.g. Information about accidents, monitoring results)

Stakeholder Consultation meeting will be held with affected groups and other relevant/affected stakeholders is anticipated after the draft ESMP report is completed. Stakeholder meetings or any information sharing activities will be notified ten (10) days in advance by Düzce Municipality through brochures, Düzce Municipality's web site and newspaper advertisements (at least one national and one local newspaper).

This consultation will include, but is not necessarily limited to, the following topics anticipated:

- Objective of the Sub-Project,
- Social, environmental, and ecological impacts/risks that are determined to occur upon the Sub-Project,
- Impacts and the mitigation or enhancement measures that are being implemented,
- Roles and responsibilities,
- Monitoring and management measures, and
- Information on the grievance mechanism for the Sub-Project.

On the other hand, the following content will be shared in this SEP for the stakeholder engagement activities:

- Location of consultation(s),
- Date(s) of consultation(s),

- Details on attendees (as appropriate),
- Meeting Program/Schedule: What is to be presented and by whom,
- Summary Meeting Minutes (Comments, Questions and Response by Presenters and Photos from the meeting); and
- Agreed actions.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

The Sub-project will be managed by a Project Implementation Unit (PIU) team to be established within the DM, under the guidance and coordination of ILBANK International Relations Department. The PIU will be responsible for procurement, financial management, audit support and reporting to ILBANK and the Financing Institution. A Sub-project-specific organizational structure that defines roles, responsibilities, and authority for the implementation of ESMP and SEP as provided as a model in [Figure 3](#). Specific personnel with clear boundaries of responsibility and authority should be appointed, including management representatives. The Sub-project-specific organizational structure to be developed will include executives, who will coordinate and manage the Sub-project, the Technical and Financial Experts who will be in charge of construction and operational phases of the Sub-project, and at least one Social Expert, one Environmental Expert and one Occupational Health and Safety (OHS) Expert. Core environmental and social responsibilities should be well defined and communicated to the relevant personnel and the rest of the Sub-Project Implementation Unit (PIU). Additionally, personnel should have adequate knowledge, skills, and experience to competently and efficiently take specific measures and actions required under ESMP.

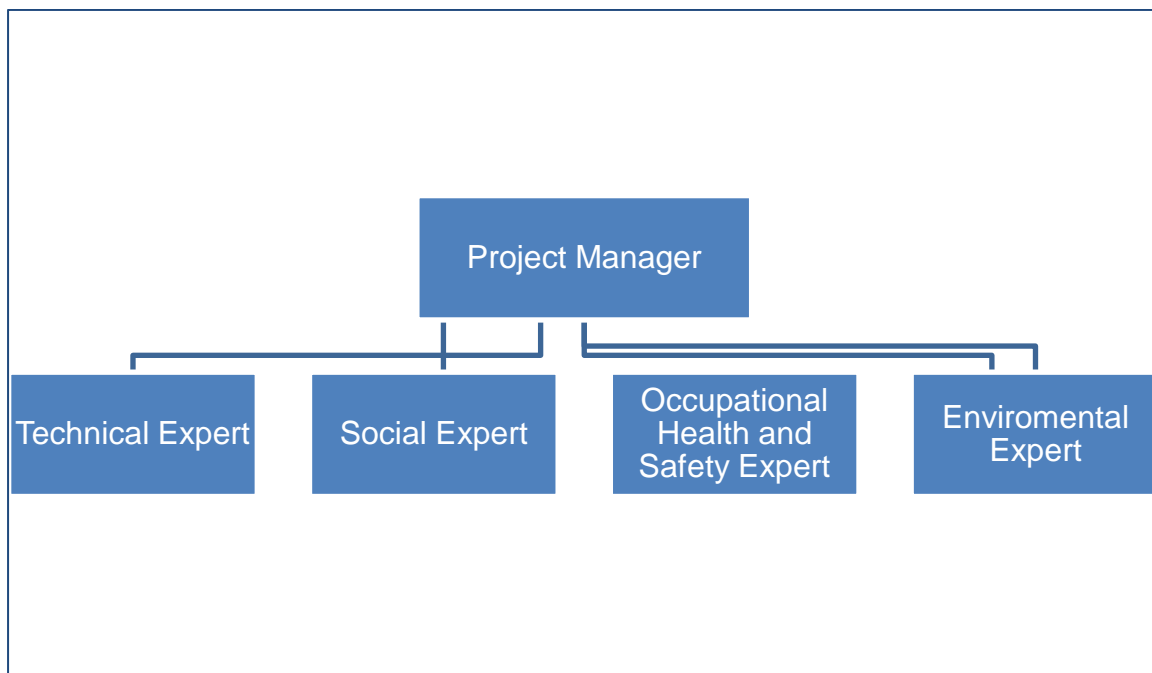


Figure 3. Organizational Chart of the Project Implementation Unit (PIU) for the Sub-Project

5.2 Management Functions and Responsibilities

The Sub-project will be awarded to a Contractor by the tender, which will be lodged by the DM and supervised by ILBANK in accordance with WB Procurement Regulations and Public Procurement Law. The roles and responsibilities of the responsible parties in the Sub-project organizational management are provided in [Table 5](#).

Table 5. Sub-Project Organizational Management

Responsible Party	Terms of Reference
Düzce Municipality (DM)	<ul style="list-style-type: none"> - The DM is the implementer and beneficiary of this Sub-project. - The DM will be responsible for providing technical and data support during the supervision of contractors and the preparation of technical and financial feasibility reports regarding Sub-project. - The DM will be responsible for preparing the bid documents during the implementation, conducting bidding processes in accordance with the statute of the Public Procurement Authority, and the legal requirements of the WB, following the Construction Contract and cooperating with ILBANK for the supervision of construction activities. - The DM will provide training to the contractor before the construction works on the implementation of the elements specified in the ESMP and SEP, and to the personnel, who will work during the operation period before the operation. - The DM will check both the technical and administrative progress of contract packages and the implementation of the points provided in ESMP and SEP on site together with Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and full time OHS Expert) who will be involved in the Sub-Project Organizational Chart. - According to the national OHS Law, all employers must notify the Ministry of Labor and Social Security in 3 business days after OHS related incidents. - Specifically, for any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.), the municipalities will inform ILBANK immediately, and ILBANK will inform the Bank about the incident within 48 hours after the occurrence of the incident or accident and will report in its turn to the Bank 48 hours after receiving from the PIUs the relevant information. - Düzce Municipality, the sub-project owner, will also establish a Grievance Mechanism in order to record and resolve the grievances related to the sub-project. - In addition to on-site inspections, the DM will review the Environmental and Social Monitoring Reports (ESMRs) to be submitted by contractors on a monthly basis and will submit these reports to ILBANK quarterly after being reviewed.
E&S Consultant	<ul style="list-style-type: none"> - 2U1K's environmental and social consultants 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.
Supervisory Consultant/ Advisor	<p>DM will appoint a Supervisory Consultant having a range of specialties to inspect the contractor's activities on a daily basis. In addition, regular quarterly report regarding to environmental, social and OHS issues of the Sub-project during construction phase will be provided by Supervision Consultant to DM. Apart from the guidance to the given to the DM about WB ESSs and also the stakeholder consultation and announcement requirements and the Sub-project documents in compliance with WB requirements, the Supervisory Consultant will appoint the personnel given below:</p> <ul style="list-style-type: none"> - The Supervisory Contract Manager will be responsible for inspecting the contractor to ensure that the recommendations and requirements given in the Sub-project disclosure package are fulfilled. They will be responsible for continuously monitoring processes and actions undertaken by the contractor and for identifying the measures to be taken by the contractor to deal with any areas of non-conformity. At the same time, they check whether the necessary training is given to the personnel who will work during the construction phase. This includes periodic audits,

Responsible Party	Terms of Reference
	<p>inspections and/or on-site checks of Sub-project areas or worksites and/or records and reports compiled by contractors.</p> <ul style="list-style-type: none"> - The Environmental Expert will be responsible for supervising the implementation of all environmental and biodiversity measures provided in the Sub-project disclosure package and for reporting to the DM regularly. The environmental expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). - The full time Occupational Health and Safety Expert will be responsible for supervising the health and safety measures throughout the Sub-project activities. OHS Expert should be certified for recognized international safety competency, for example the National General Certificate of Occupational Health and Safety or equivalent. - The Supervisory Consultant/Advisor will also establish a Grievance Mechanism to record and resolve grievances (worker and public grievances) related to the Sub-Project. - The Social/Human Resources Expert will be responsible for supervising the implementation of community health and safety and social measures provided in the Sub-project disclosure package, as well as the implementation of SEP, and for reporting to the DM regularly. Manages the Grievance Mechanism (GM) and regularly monitors the reporting of grievances to the DM. It follows the penalties arising from the contract, checks the suitability of the work done by the Contractor, gives warnings and directions, and notifies ILBANK and the DM in a timely manner if necessary. Participates in stakeholder engagement activities. The expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). The expert is responsible for regularly reporting to the DM.
Contractor	<ul style="list-style-type: none"> - The construction works under the contract packages included in the scope of the ESMP will be carried out by contractors. - Contractors will be responsible for observing the liabilities provided in the ESMP. Issues related to the implementation of the ESMP will be examined by the contractor during the preparation of the bid, and proposals will be submitted considering the ESMP prepared by the Contracting Authority. - The contractor will prepare monthly Environmental and Social Monitoring Reports (ESMR) and submit to the DM through supervision consultant. - The ESMP includes the monitoring tables that describe the possible negative effects of the operations to be carried out during the construction phase of the Sub-project and the measures to be taken to minimize these effects and the conditions for putting these measures into action. Additionally, the said tables include the entities and organizations (Sub-project stakeholders) responsible for the aforementioned items. - During the construction phase, the contractor will provide training to the personnel who will take part in the Sub-project, including the measures within the scope of ESMP, to raise awareness of environmental, occupational and worker health and safety, public health and safety and social issues. - As part of ESMP, implementation of the measures identified for the construction phase will be coordinated by Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and OHS Expert) who will be involved in the Sub-Project Organizational Chart. The said experts will be responsible for taking actions required to eliminate/minimize environmental and social impacts/risks in line with ESMP and for putting monitoring plans into practice. - The Contractor shall also establish a Grievance Mechanism to record and resolve grievances from employees regarding the Sub-Project. - In case of contingencies such as environmental, social, and labour issues or accident or loss of time, the contractor will immediately inform the DM, and the DM will inform ILBANK and the WB within three (3) business days. A report on the root causes of the incident and the corrective actions to be taken will be submitted to ILBANK and the WB within thirty (30) days.
World Bank and ILBANK	<ul style="list-style-type: none"> - During the construction and operation phase, the officials from ILBANK and the WB will audit the DM's performance regarding compliance with the provisions set out in the ESMP managed by the DM. - ILBANK, will review ESMRs to be submitted quarterly by DM. - Reports will be integrated in the bi-annual reports of the ILBANK and submitted to the World Bank

Responsible Party	Terms of Reference
	<ul style="list-style-type: none"> - ILBANK will review the documents related to the environmental and social assessment of the Sub-project, provide comments to consultants, and giving official approval to these documents and procedures in accordance with the WB safeguards requirements, - ILBANK will perform an overall quality assurance function that the EA documents prepared meet WB requirements. - Regarding the works and reporting activities, ILBANK International Relations Department will be informed through the monitoring reports prepared by the DM. - ILBANK, on the other hand, will inform the WB with environmental and social monitoring reports semi-annually/biannually. In addition to this information, WB will audit the Sub-project activities and progress through on-site inspections that will be conducted by the WB biannually. - WB will visit Sub-project sites on occasion, and as required, as part of Sub-project supervision. - WB will control whether the necessary trainings are given to the personnel who will work during the construction phase

All supporting documents for stakeholder activities (newspaper advertisements, list of attendees, full meeting minutes (as an appendix), and sample brochure) will be included in the minutes from each stakeholder consultation. It includes participant registration forms and full meeting minutes (information should be kept on record but not made publicly available in the appendix to the SEP – the relevant lines should be blurred when disclosing the SEP).

A summary of the implementation of the GM will be published annually on the DM website (<https://duzce.bel.tr/>) after removing the identity information of the persons to protect their identity. Sub-project’s environmental and social performance and implementation reports will share at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction).

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders.

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as the DM’s website, letters, and face to face meetings with the implementation of the SEP.

The GM will be advertised and announced to affected stakeholders on the DM’s website so that they are aware of the process, know they have the right to submit a grievance, and understand how the mechanism will work and how their grievance will be addressed.

6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is foremost to give access to a problem-solving procedure to project affected people including affected communities and project workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between project worker's, local communities, and other stakeholders.

The structured GM will ensure that grievances associated with the Sub-project are addressed through a transparent and impartial process. From the early stages of the Sub-project lifecycle, the grievance procedure will be disclosed to the public through individual or group meetings, printed materials, notice boards.

The grievances will be acknowledged by the GM official assigned by the Düzce Municipality (DM) and timeframe for the provision of response or for further consideration will mainly depend on the complexity of the issue raised, however, ideally, it is expected 2 days registration, 10 days evaluation, 15 days response.

The GM official who will manage the GM will be knowledgeable about the guidelines prepared by the World Bank (WB) to prevent sexual exploitation, abuse and harassment cases occurring in the Sub-project. Cases of gender-based violence, exploitation and harassment may go unreported due to a prevailing culture of silence caused by negative reactions from the community towards the victim. To avoid this, it is highly important that the stakeholders may raise grievances about these issues to the Sub-project anonymously. In addition, the authorities handling the grievances should maintain confidentiality when handling such grievances and address them with an unbiased approach.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders and project workers usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Diversity in access to information will be developed in line with the demands of the local community and project workers. For example, if women participants wish to raise their grievances in person, they can be put in touch with a female official. If women stakeholders request a separate stakeholder engagement meeting, or if the authorities identify a need for one, a stakeholder engagement meeting will be organized specifically for women stakeholders. Such solution suggestions can be diversified with the observations of Düzce Municipality and GM official. Stakeholders and sub-project workers will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Sub-project's lifespan. All stakeholders and sub-project workers initiating a grievance will have an opportunity to claim their case confidentially manner. The DM will ensure that the name and

contact details of the complainant are not disclosed without their consent. Details of the GM can also be found in the SEP.

Other grievances received by Contractor, CIMER, YIMER, ILBANK, WB etc. will be also directed to White Table.

During construction and operational activities, the GM described in this chapter will continue to be guided by stakeholders and sub-project workers, making this procedure accessible to all affected stakeholders and sub-project workers. The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms (see Appendix-A) that will be placed in the entrances of construction sites where local communities and sub-project workers can easily reach. The responsible staff of Contractor will record all grievances that received at the construction site and convey to the DM's grievance mechanism officer for further actions and resolution.

For purposes of this proposed Sub-project, the DM will establish a specific grievance mechanism for any concerns and complaints to be handled in a systematic manner. Information on the grievance mechanism will be distributed together with general information about the Sub-project. Any grievance related to proposed Sub-project will be first logged at the municipality/utility level and will be addressed by the municipality PIU satisfactorily within a certain period. There is a toll-free number (153), available for citizens to submit grievances through the 'White Table' system.

The personnel to be assigned by the DM will record all grievances that are:

- Communicated to the Sub-project officials personally,
- Communicated by phone/e-mail,
- Dropped in grievance boxes to be installed in the Municipal Building and the Sub-Project Building,
- Conveyed by stakeholders who want to communicate based on the Sub-Project documentation,
- From the personnel during the construction phase,
- From the operating personnel, and
- Communicated to contractors and inserted in a petition – in a single system and follow such grievances.

For this method to be successful, DM personnel to be assigned will constantly be in contact with other DM experts, contractors, and personnel who will be involved in the operational phase. Additionally, the job description of DM personnel to be assigned will include the introduction of complaint mechanisms, which are publicly available and will be set up separately for employees, to relevant stakeholders.

ILBANK has a Grievance Mechanism in place. There is no grievance mechanism established by the DM for the subproject yet. A grievance mechanism (GM) will be established by the DM in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities. DM's PIU and construction contractor will be accessible for the stakeholders and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team.

If stakeholders fail to reach a satisfactory solution through the channels provided above or have requests for a higher-level explanation, they will be able to reach the Presidency's Communication Centre (CIMER), the Foreigners Communication Centre (YIMER) and the relevant legal institutions.

CIMER (Presidential Communication Centre):

CIMER is an online platform in Turkey established by the Presidency to facilitate communication between citizens and the government. It allows individuals to submit their requests, complaints, suggestions, and inquiries directly to various government institutions. The primary functions of CIMER are:

- Receiving and Processing Complaints and Requests
- Ensuring Government Accountability
- Improving Public Services

YIMER (Foreigners Communication Centre):

YIMER is a helpline and information service in Turkey designed to assist foreign nationals residing in or visiting the country. It provides support in multiple languages and offers a wide range of services. The primary functions of YIMER are:

- Providing Information
- Assisting in Emergencies
- Facilitating Communication
- Guidance and Support

Contact details of the main complaint channels and alternative complaint channels are as follows:

Düzce Municipality's Communication Channels:

- Whatsapp Notification Line: 0533 788 8181
- White Table number: 153

- E-Mail: info@duzce.bel.tr

ILBANK's Communication Channels:

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

ILBANK Phone number: +90 312 508 7979

ILBANK E-mail: bilgiuidb@ilbank.gov.tr and etikuidb@ilbank.gov.tr

ILBANK Address for Petition Service (ILBANK International Relations Department, Grievance Mechanism Team - Emniyet Mahallesi Hipodrom Caddesi 9/21 Yenimahalle/Ankara)

Presidency's Communication Centre (CIMER):

CIMER Website: www.cimer.gov.tr

CIMER Call Centre: 150

CIMER Phone Number: +90 312 525 55 55

CIMER Fax Number: +90 0312 473 64 94

Address for Official Letter: Republic of Türkiye, Directorate of Communications Kızıllırmak Mah. Mevlana Bulvarı No:144 ÇANKAYA/ANKARA

Mail addressed to Republic of Türkiye, Directorate of Communications

Individual applications at the community relations desks at governorates, ministries, and district governorates

Foreigners Communication Centre: The Foreigners Communication Centre (YIMER) has been providing a centralized complaint system for foreigners:

YIMER Website: www.yimer.gov.tr

YIMER Call Centre: 157

YIMER Phone Number: +90 312 5157 11 22

YIMER Fax Number: +90 0312 920 06 09

Address for Official Letter: Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA

Mail addressed to Republic of Türkiye, Directorate of Communications

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

Relevant Legal Institutions: Relevant Institutions can be summarized as, but not limited to, as follows.

Civil Courts of First Instance,
Administrative Court,
Commercial Courts of First Instance
Labour Courts, and

Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>)

Since there are special procedures/principles for handling sensitive content grievances (Sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in Sub-project areas), these grievances will be handled centrally at ILBANK, not at the DM or Contractor level.¹ ILBANK's GM procedure has been prepared in accordance with WB ESF/ESS10 and it also complies with the WB's environmental and social standards². In case a sensitive complaint is received by the Contractor or DM, they will be responsible for conveying the issue directly to the ILBANK GM focal point³. However, Contractor and DM should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

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

ILBANK E-mail: etikuidb@ilbank.gov.tr

ILBANK Address for Petition Service: ILBANK International Relations Department, Grievance Mechanism Team – Emniyet Mahallesi Hipodrom Caddesi 9/21 Yenimahalle/Ankara

DM official who will manage the GM will be knowledgeable about the guidelines (World Bank's 'Preventing and Addressing Sexual Exploitation, Abuse, and Harassment (PSEAH) Guidelines for World Bank-Financed Projects') prepared by the WB to prevent sexual exploitation, abuse and harassment cases for the Sub-projects financed under construction works

Samples of grievance form and grievance closure and consultation form prepared for use within the scope of the Sub-project are given in Appendix-A, Appendix-B and Appendix-C, respectively.

Communities and individuals who believe that they are adversely affected by a WB supported Sub-project may submit complaints to existing project-level GMs or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

Sub-project affected communities and individuals may submit their complaint to the Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, as

¹ https://ewdata.rightsindevelopment.org/files/documents/12/WB-P170612_7nHpF6X.pdf

² WB's ESSs

<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

³ https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_uluslararası_projeler_sikayet_mekanizmasi_proseduru_1646748134.pdf

a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the WB's corporate GRS:

- <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the WB Inspection Panel:

- www.inspectionpanel.org.

6.1 Project Level Grievance Mechanism

Table 6. Project Level Grievance Mechanism

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	There exist three Grievance Mechanism at the National Level: •Presidency's Communication Centre and •Foreigners Communication Centre •Düzce Municipality level GM There is also project level GM which includes the WGM	-	Presidency's Communication Centre, and Foreigners Communication Centre and related authorities For project level: PMU is the main responsible body
Grievance uptake	Grievances can be submitted via the following channels: Stakeholder visits Telephone call Mail Via Web site Online meeting or meeting Local media accounts Wish-complaint boxes Anonymous Grievances can be submitted via the following channels: telephone Letter to Grievance focal points at local facilities •Suggestion box	-	PMU Construction Supervision Consultant Contractor
Sorting, processing	Any complaint received is forwarded to social expert of the Düzce Municipality Logged in GM record log and categorized according to the complaint types: If the complaint is assessed to be out of the scope of the Grievance Mechanism, the grievant will be notified through the desired communication method and an alternative mode of solution will be suggested.	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by Social Expert of the Düzce Municipality	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by Social Expert A proposed resolution is formulated by the relevant unit and communicated to the complainant by the preferred tool.	Within 10 working days	Local grievance focal points Relevant unit(s) (if necessary)
Monitoring and evaluation	Data on complaints are collected in a database and reported to PIU every month	Monthly	PMU

Step	Description of Process	Time Frame	Responsibility
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected in the log	15 working days after the implementation of the resolution	Local grievance focal points PMU
Training	Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows •SEP •GM •Community health and safety •social issues, •GBV, SEA/SH.	According to the Project phases and 2 in a year	-

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Sub-Project 's lifespan. All stakeholders initiating a grievance will have an opportunity to claim their case in a confidential manner. Düzce Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent. Details of the Grievance Mechanism can also be found in SEP.

6.2 Grievance Log

To provide a framework for the GM to be established, this subsection presents information about the data that should be included in the grievance registration procedure.

As part of the Mechanism to be established, all received grievances will be recorded in the Grievance Log with a reference number assigned.

In addition, the Grievance Log will be used to monitor the status of the grievance, determine the frequency of occurrence of the grievance, analyse the reasons for the grievance, and identify common grievances and recurring trends. Key Performance Indicators will be monitored using the database where the logs are kept. The scope of the Grievance Log is presented in Appendix-D.

6.3 Public Grievance Mechanism

DM handles public grievances and views through its website and complaint hotlines numbered 185 and 153. This municipal unit is established to receive grievances and requests from local citizens and intended to produce possible solutions within the DM for reported concerns.

There are six (6) steps that supplement the Public GM. This process is described by the steps provided in Table 7.

Table 7. Public Grievance Mechanism

Steps	Scope	Details	Responsible parties
Step 1	Identify grievances (Stakeholders convey their complaints to the authorized person through various channels)	<i>Regardless of general response and resolution times, some important grievances may require immediate action, for example an urgent safety issue or issues regarding local people's livelihoods.</i>	GM officer
Step 2	Record grievances in the system	<i>After determining the urgency level of the grievances, it will be ensured that the grievances are recorded.</i>	GM officer
Step 3	Determine specific actions for grievances and report them to relevant units / supervisors for resolution	<i>Requests that require urgent support will be responded to and given support within the same day, and all outstanding grievances/requests will be approved within two (2) business days and responded to within ten (10) business days and concluded not later than fifteen (15) business days. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.</i>	GM officer
Step 4	Develop a response to grievances	<i>The PIU of the DM and the construction contractor are the grievance resolution teams of the stakeholders and will be responsible for responding to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team.</i>	GM officer DM'S PIU ILBANK GM Team
Step 5	Communicate the response developed for grievances	<i>The official appointed for the Sub-project grievance handling will adopt and implement the most accurate approach to the communication of the relevant response. The response will also contain an explanation of how the person that raised the grievance can proceed with the grievance in case the outcome is not satisfactory. <i>In case the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the DM's website and on notice boards located around the Sub-project building as well as in the headman's offices in the settlements that are anticipated to be affected. In addition, the neighbourhood headmen should be contacted regarding anonymous grievances and resolutions.</i></i>	GM officer

Steps	Scope	Details	Responsible parties
Step 6	Close grievances	<p><i>Based on the potential effects of the grievance, the complainant can be allowed time to respond, and the complainant's response will be recorded, to help assess whether the grievance is closed or whether further action is required.</i></p> <p><i>Final approval will be provided after the relevant Sub-project officials assess whether the grievance can be closed.</i></p> <p><i>Closed grievance files will be recorded in a systematic way and will be submitted to the authorities during third party inspections when necessary.</i></p> <p>If the aggrieved party is not satisfied with the proposed solution, an appeal is available.</p>	GM officer

The officer appointed by Düzce Municipality for the Public Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form (Appendix-A). Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Appendix-B). Thus, all activities carried out under the grievance mechanism will be recorded, and care will be taken to establish a transparent relationship between the public and the sub-project owner.

In case the grievance is raised anonymously, a summary of the grievance and resolution will be posted on the DM's website and on notice boards located around the Sub-project Administrative Building in construction area as well as in the headman's offices in the settlements that are anticipated to be affected.

6.4 Worker Grievance Mechanism

Worker GM is defined as complaints from Sub-project employees (including both direct and indirect employees). This mechanism is structured with an intention of it being an effective approach for grievances that submitted by complainants/aggrieved parties (Identify grievances), assessment, and resolution of grievances throughout the Sub-project's lifespan. The project will be supervised by independent institutions during the construction period and operation period and reports will be made to ILBANK and the World Bank at the periods determined according to the agreement. It will also be included in the written contract of the employees that they will not be subjected to any reprisal as a result of using the grievance mechanism. Thus, the Grievance Mechanism will ensure that no employee who makes a complaint will be subject to any retaliation.

The scope of the Worker GM can be summarized as follows, but not limited to; occupational health and safety, labour conditions, wages, problems with the local community or co-workers, hygiene problems in common areas, insufficient food and/or worker safety, etc.

The GM will be informed to all Sub-project workers through written and verbal communications. Each worker should be informed about the GM at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is very important to some employees; Therefore, workers can submit their complaints anonymously, there are no restrictions in this regard. If an anonymous complaint is received, the corrective action taken to address the complaint or the response to the complaint will be announced by posting it in appropriate areas in the containers that workers will use.

The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms that will be placed in the containers. The responsible staff of Contractor will record all grievances received at the construction site and convey to the Sub-project GM officer for further action and resolution.

It is important to note that Sub-project employees will retain their right to access the public GM for non-employment-related matters.

Complaints should be investigated as soon as possible to prioritize resolution. Regardless of the general response and resolution timeframes, some complaints may require immediate intervention, for example in cases involving workers' livelihoods.

There are five (5) steps that supplement the Worker GM. This process is described by the steps provided in Table 8.

Table 8. Worker Grievance Mechanism

Steps	Scope	Details	Responsible Parties
Step 1	Identify grievances	<i>The grievance will be raised through DM/Contractor official to be assigned. This could be in person, by phone, letter, grievance boxes or email. Apart from DM and ILBANK, project workers can also submit their complaints to institutions such as CIMER, YIMER, Civil Courts of First Instance, Administrative Court, Commercial Courts of First Instance Labour Courts, and Ombudsman (https://ebasvuru.ombudsman.gov.tr/).</i>	GM officer
Step 2	Record grievances in the system	<i>Once the grievance is received and recorded, DM/Contractor official to be assigned based on the subject and issue will identify the department, management, or personnel responsible for resolving the grievance.</i>	GM officer
Step 3	Follow up grievances	<i>DM/Contractor official to be assigned and the relevant units should assess the facts relating to the grievance. This should be aimed at establishing and analysing the cause of the grievance and identifying suitable mitigation measures. The analysis of the cause will involve assessing various aspects of the grievance, such as the background of the employee, frequency of the</i>	GM officer DM'S PIU ILBANK GM Team

Steps	Scope	Details	Responsible Parties
		<p><i>complaint occurrence, managerial practices, recent incidents in the workplace, etc.</i></p> <p><i>When needed, DM official to be assigned may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. A site visit may be deemed necessary to gain first-hand understanding of the nature of the complaint and to verify the validity and severity of the grievance.</i></p> <p><i>After the details of the grievance are escalated to the relevant management unit, the said grievance will be discussed jointly by the employee and the regional and/or line manager.</i></p> <p><i>DM's PIU and construction contractor will be accessible for workers and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team.</i></p>	
Step 4	Resolve and close grievances	<p><i>This is concluded based on the process developed in consultation between the assigned DM official and the related departments or management. DM's PIU and construction contractor will be accessible for workers and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team.</i></p> <p><i>If the grievance is beyond the duty of the assigned DM official, the grievance should be escalated to the Sub- Project Implementation Unit (PIU) to so that it can be resolved at managerial levels within 7 business days of the escalation.</i></p>	GM officer DM'S PIU ILBANK GM Team
Step 5	Close Grievances	<p><i>The assigned DM official, having received the necessary signatures, will close the grievance once the grievance is resolved and the result is communicated to the complainant. The current status of the grievance and the details regarding how the grievance is resolved will be recorded in the Grievance Log. The purpose of recording further information in the grievance log is to provide a baseline for any similar grievances that may arise in the future.</i></p> <p><i>If the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the DM's website and on notice boards located in common areas of the facility and should be announced through toolbox or weekly meetings.</i></p> <p><i>If the aggrieved party is not satisfied with the proposed solution, an appeal is available.</i></p>	GM officer

The officer appointed by Düzce Municipality for the Worker Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form (Appendix-A). Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Appendix -B). Thus, all activities carried out under the grievance mechanism will be recorded, and care will be taken to establish a transparent relationship between workers and the sub-project owner.

7. MONITORING AND REPORTING

7.1 Summary of How SEP Implementation will be Monitored and Reported

Düzce Municipality (DM) will implement the monitoring activities throughout the lifetime of the Sub-project. This Stakeholder Engagement Plan (SEP) will be updated upon receipt of feedback from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedback. In addition, SEP will be updated in case of major changes that may arise in the scope of the Sub-project. Apart from these, a summary of the implementation of the Grievance Mechanism (GM) will be published annually on the DM's website (<https://duzce.bel.tr/>) after removing the identity information of the persons to protect their identity.

Contractors will deliver ESMRs to the DM on a monthly basis. After reviewing these ESMRs, the DM will submit the ESMRs on its environmental and social performances to ILBANK as quarterly, along with a summary of the grievances and how they are resolved, including the grievance logs, together with the Grievance Register. The GM established for the Sub-project will be used effectively and the statistical summary of the outputs of the GM will be reported to the DM and lenders. Thus, the topics that the complaints are concentrated, the number of complaints, solutions and timing will be tracked through the database and the Grievance Register provided in Appendix-D.

Moreover, ESMRs will be submitted to WB by ILBANK every three (3) months together with Progress Reports. The DM will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national/international regulations and lenders' requirements.

The key performance indicators to be used during the implementation of this SEP are set out in Table 9. **Hata! Başvuru kaynağı bulunamadı.**

Table 9. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

No	KPI	Sub-Project Phase	Monitoring Measures	Assessment Frequency	Responsible Party
1	<p>Gender, province, category of grievance, status of grievances (closed, pending, resolved), etc.</p> <p>Reduction in the number of complaints received considering the number of complaints at the beginning of the project,</p> <p>Increase in the number of closed grievances considering the grievance closure rate at the beginning of the project (closed grievances/total number of grievances),</p> <p>Reduction of the grievance closure time by taking into account the grievance closure time at the beginning of the project,</p> <p>Closing all grievances within the targeted time frame</p>	Construction and Operation	Database	2 months	Düzce Municipality
2	<p>Number of grievances responded in the target timeframe of one month</p> <p>90% of grievances resolved within the stipulated timeframe</p>	Construction and Operation	Database	2 months	Düzce Municipality
3	<p>Providing feedback to stakeholders on the implementation of the GM (the number and type of consultations, number of participants, type of stakeholders engaged etc.)</p>	Construction and Operation	Reporting	2 months	Düzce Municipality
4	<p>Internal audit of the GM to ensure that the GM is implemented and that grievances are adequately handled</p>	Construction and Operation	Inspection Report	2 months	Düzce Municipality

No	KPI	Sub-Project Phase	Monitoring Measures	Assessment Frequency	Responsible Party
5	Number of Planned Stakeholder Engagement Activities Type of planned Stakeholder Engagement Activities Number of participant stakeholders Type of participant stakeholders (Activity records, meeting minutes, participant records and related reports, documents, etc.) Increase in the number of activities carried out compared to the activities carried out under current conditions Increase in the number of participants compared to the number of participants at the beginning of the project The increase in the number of stakeholder types (as groups or individuals) compared to the different types of stakeholders at the beginning of the project	Construction and Operation	Reporting	3 months	Düzce Municipality

The current GM officials and the official to be appointed by the DM will review a statistical and qualitative analysis of feedback and complaints and their results every two months and will submit the reports to the Sub-Project Implementation Unit (PIU) and the DM.

Two months reports will contain only as much information as required regarding the grievance, and the personal data of individuals using the GM will remain confidential and will not be shared in these reports.

According to the reporting requirements set in the TEFWER's ESMF, the DM will be responsible for submitting a quarterly report to ILBANK on the progress of the Sub-project. Sub-project specific progress reports will also include a section on stakeholder engagement activities carried out during the specified period. Stakeholder engagement activities will be presented in a tabular format listing the tasks undertaken, as well as the time of action, the responsible party, the target group, and the purpose of the action. The DM will inform ILBANK of any changes made in the SEP (if any).

This SEP is a living document and needs to be updated throughout the life of the Sub-project. These updates can be updated in line with a change in the Sub-project, increasing complaints, requests/demands and opinions arising in the SEPs to be held quarterly. At the same time, the grievances raised in the grievance feedback reports that the GM officer will submit to the DM every two (2) months will be included in the stakeholder engagement plan. It will be an important indicator for the need for updates.

7.2 Reporting Back to Stakeholders

Sub-project's environmental and social performance and implementation reports will share at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction).

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as the DM's website, letters, and face to face meetings with the implementation of the SEP.

In cases where urgent intervention is required, a response will be given on the same day, while stakeholders regarding other complaints, suggestions and requests will be responded to within 15 days at the latest. Stakeholders will be informed about the corrective actions taken.

8. REFERENCES

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APPENDICES


APPENDIX - A Sample Grievance Form

APPENDIX - B Grievance Closure Form

APPENDIX - C Sample Consultation Form

APPENDIX - D Sample Grievance Register

APPENDIX - A Sample Grievance Form

<p>Düzce Municipality</p>  <p>Düzce Belediyesi</p>	<p>Düzce Municipality</p> <p><i>DÜZCE (CENTRUM) WATER SUPPLY PROJECT</i></p> <p>PROJECT NO: 23/029</p> <hr/> <p>GRIEVANCE FORM</p>	
Form Completed by:	Date and Time:	
Subject of Meeting:	<p>Düzce Municipality Directorate of Water and Sewerage</p> <p>PROJECT NO: 23/029</p>	
<p>1. PARTICULARS OF THE COMPLAINANT (Personal Information is not Mandatory to be Filled and can be Left Blank if the Complainant Wants to Remain Anonymous)</p>		
Name-Last Name:	Grievance Communicated by:	
TR ID No:	Telephone / Toll Free Number <input type="checkbox"/>	
Telephone:	Face-to-Face Meeting <input type="checkbox"/>	
Address:	Website / E-mail <input type="checkbox"/>	
E-mail:	Other (Describe) <input type="checkbox"/>	
<p>Type of Stakeholder</p>		

Governmental Body <input type="checkbox"/>	PAP	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Union of Industries <input type="checkbox"/>		Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. DETAILED INFORMATION ON THE GRIEVANCE				
Description of the grievance:				
Solution method requested by the complainant				


Recorded by

Name-Last Name/Signature

Complainant

Name-Last Name/Signature

APPENDIX - B Grievance Closure Form

Düzce Municipality  Düzce Belediyesi	Düzce Municipality DÜZCE (CENTRUM) WATER SUPPLY PROJECT PROJECT NO: 23/029
	GRIEVANCE CLOSURE FORM
Düzce Municipality PROJECT NO: 23/029	
1. DETERMINATION OF THE CORRECTIVE ACTION	
1	
2	
3	
4	
5	
Responsible Departments	
2. GRIEVANCE CLOSURE	
<i>This section will be completed and signed by the complainant, if the grievance provided in the</i>	

<i>Grievance Log Form is remediated.</i>	
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Grievance Closure Date:

Grievance Closer's Full Name/Signature:

Complainant's Full Name/Signature:

APPENDIX - C Sample Consultation Form

No	İstişare tarihi: Consultation date:	İstişare yeri: Consultation location:	İstişare konusu: Consultation subject:	İstişare saati: Consultation time:	Toplam katılımcı sayısı: Total number of participants :	Katılımcı adı soyadı: Participant name and surname	Kurum / firma: Institution/company :	Posizyonu/ mesleği: Position/ profession :	E-mail/ Telefon : E-mail/ Phone:	İmza Signatüre
1										
2										
3										
4										
5										
6										
7										
8										
9										

No	İstişare tarihi: Consultation date:	İstişare yeri: Consultation location:	İstişare konusu: Consultation subject:	İstişare saati: Consultation time:	Toplam katılımcı sayısı: Total number of participants :	Katılımcı adı soyadı: Participant name and surname	Kurum / firma: Institution/company :	Posizyonu/ mesleği: Position/ profession :	E-mail/ Telefon : E-mail/ Phone:	İmza Signatüre
10										
11										
12										
13										
14										
15										

APPENDIX - D Sample Grievance Register

Complaint Register Number	How Complaint is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Municipality/Utility Level, Regional ILBANK Office, ILBANK HQ Level)	Date of Complaint Received	Location of Complaint Received	Name of Person Receiving Grievance	Land Parcel # (If complaint is related to land)	Complainant Information					Sub-Project Component Related to Complaint	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Complaint Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)	
							Name/Surname	ID Number	Telephone/e-mail	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken		

Source: ILBANK Grievance Register Table