



DEVELOPMENT
INVESTMENT
BANK OF TÜRKİYE



THE WORLD BANK

STAKEHOLDER ENGAGEMENT PLAN

FOR

TÜRKİYE INDUSTRIAL EMISSION REDUCTION PROJECT

DEVELOPMENT AND INVESTMENT BANK OF TÜRKİYE (TKYB)

FEBRUARY 2024

ABBREVIATIONS & ACRONYMS

CE	CITIZEN ENGAGEMENT / COMMUNITY ENGAGEMENT
ESF	ENVIRONMENTAL AND SOCIAL FRAMEWORK
ESS	ENVIRONMENTAL SOCIAL STANDARD
GRM	GRIEVANCE REDRESS MECHANISM
IFC	INTERNATIONAL FINANCE CORPORATION
LMP	LABOR MANAGAMENET PROCEDURE
PIU	PROJECT IMPLEMENTATION UNIT
SEP	STAKEHOLDER EGAGEMENT PLAN
TIERP	TÜRKİYE INDUSTRIAL EMISSION REDUCTION PROJECT
TKYB	DEVELOPMENT AND INVESTMENT BANK OF TÜRKİYE
WB	WORLD BANK

Stakeholder Engagement Plan (SEP)

Template for Substantial Risk and High-Risk Projects

Türkiye Industrial Emission Reduction Project (TIER Project)

1. Introduction/Project Description

Türkiye's economic growth is strongly correlated with growth in its manufacturing sector. Türkiye's real Gross Domestic Product (GDP) increased more than sixfold from US\$151 billion in 1990 to US\$906 billion in 2022, while the poverty rate reduced significantly. However, Türkiye's economic growth has been accompanied by environmental degradation, including increasing emissions of air pollutants and greenhouse gases. Emissions of both air pollutants and greenhouse gases (GHGs) have adverse impacts on environment, climate, productivity, health, and resilience. GHG emissions, excluding the land use, land-use change, and forestry (LULUCF) sector, increased by 157% from 1990 to 2021 reaching 564 Mt CO₂-equivalents. Emissions of key air pollutants have also significantly increased in the last decades, including sulfur dioxide (SO₂) by 60%, nitrogen oxides (NO_x) by 286%, ammonia (NH₃) by 51%, non-methane volatile organic compounds (NMVOC) by 30%, particulate matter (PM₁₀) by 10%, and fine particulate matter (PM_{2.5}) 472% (all trends 1990 to 2021). Air pollution is the largest environmental risk factor for human health and causes 41,524 premature deaths per year in Türkiye (51 deaths per 100,000 population) from PM_{2.5}, with associated welfare costs of 5.8 percent of the Turkish GDP. The industry sector is a major contributor to air pollution and GHGs with emissions having steadily increased over the past two decades along with the growth in heavy industry and manufacturing. GHG emissions from industry alone now represent 28% of the total (excluding LULUCF). Metals (iron and steel), and non-metallic minerals (mainly cement) are the largest GHG emitting sectors through stationary combustion and process emissions.

To help decarbonize industrial sectors, the government is planning to implement an emissions trading system (ETS) that will place a price on carbon emissions. The government is also developing a green taxonomy to help channel finance to green investments. As a result of the growing ambition of the policy environment, many industries are starting to investigate emission reduction opportunities at their installations, but support is needed.

Türkiye is receiving support from the EU through a **project on the Determination of Industrial Emissions Strategy (DIES)**, which is preparing an action plan to be available by the end of 2023. As per the DIES project, there are approximately 6,000 IED installations in Türkiye and it is estimated that EUR 27 billion of investment is required for alignment with the provisions of the IED. According to the survey conducted by the MoEUCC, the uptake of cleaner production measures (at least one) is low in the industries with relatively large and medium installations, such as metal (40%), cement (59%) and energy (62%), whilst this figure is higher in leather (70%) and textile (75%) industries.

This project aims to support Türkiye in achieving its climate and air quality objectives by reducing emissions from the important industrial sectors. With the forthcoming ETS and legislation in line with the IED, industrial emitters will need to start investing in new technologies and processes that will result in substantial emissions reduction. By providing long-term finance, this project will address a key financing gap for implementing emission reduction measures in industry and will support projects that are economically beneficial but not being funded under current financing

terms. The project can help demonstrate the business case for such investments and spur market development for clean technologies. This can inform the broader financial market about how to value such projects, inform medium and large industries about the costs and benefits of investing in emissions reductions, help businesses and the financial sector become more familiar with emission reducing investments, and support the flow of finance from the commercial banking sector in the coming years and when macroeconomic conditions settle.

The proposed project contributes to achieving several objectives in the World Bank's Türkiye Country Partnership Framework (CPF, 2018–2021). In particular, the project will contribute to i) Focus Area 1 – Growth, CPF Objective 3: Enhanced competitiveness and employment in selected industries through improving environmental competitiveness of the industrial sector in Türkiye by increasing uptake of cleaner technologies in selected industrial sectors. The project also contributes to Focus Area 3 – Sustainability. Under this Focus Area, the proposed project will contribute to Objective 9 – Strengthened results under climate action agenda given that measures in industries will result in GHG emission reduction.

The Project is consistent with the Türkiye's Nationally Determined Contribution (NDC), the Türkiye Country Climate and Development Report, and the climate Memorandum of Understanding signed between the World Bank, development partners and Türkiye in November 2021. Türkiye's mitigation policies target GHG emission reduction from the energy, industry, transportation agriculture, building, and waste sectors as well as LULUCF. Particularly, its mitigation policy targeting the industry sector include supporting green transition in industry by prioritizing certification of industrial installations that use "Best Available Techniques" or BAT for clean and green industrial production. Türkiye is also in the process of developing its Long-term strategy (LTS) to set out goals to achieve net zero emissions by their target of 2053.

PROPOSED PDO/RESULTS

The project development objective is to reduce the emission of air pollutants and GHGs from selected industry sectors of Türkiye. There would be 2 potential key results. First one is projected lifetime net air pollutant emission reduction from selected industries (metric ton), second is projected lifetime net GHG emission reduction from selected industries (metric ton)

Intermediate indicators include: (iii) the amount of sub-loans to industry targeting air pollutant and GHG emission reduction (USD); (iv) the number of industries adopting the best available techniques (number); (v) the number of industrial firms that receive IED permit (number). The specific air pollutants to be reduced in the PDO indicator (i) and intermediate indicators including gender and citizen engagement indicators will be further discussed during preparation and included in the results framework of the project appraisal document (PAD).

In summary the project development objective is to reduce the emission of air pollutants and GHGs from selected industry sectors of Türkiye. The TIERP Project will contribute to (i) improving air quality and reducing GHG emissions, which are the provision of public goods; (ii) demonstrating the adoption of emission reduction technologies in industries by providing longer-term finance to firms for clean air and decarbonization; (iii) spurring market development for increasing uptake of clean technologies in industries.

Türkiye Industrial Emission Reduction Project (TIER Project) is being prepared under the World Bank's Environment and Social Framework (ESF).

In the scope of the Türkiye Industrial Emission Reduction Project (TIER Project), all carbon-intensive sectors and firms are stakeholders. Especially the most carbon-intensive sectors are crucial stakeholders which are Energy industries, Metal production and processing industries, Mineral industries, Chemical industries and Waste industries. These industries are located in whole Türkiye, there is a map of the Organized Industrial Zone below;



Figure 1: Map of the Organized Industrial Zone in Türkiye

The all OIZs are the potential project components, and they are located almost all over the whole Türkiye.

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the Development and Investment Bank of Türkiye (TKYB) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

Managing stakeholders is a comprehensive process that spans the entire project life cycle. When well-planned and executed, it fosters the development of robust, positive, and responsive relationships crucial for effectively addressing a project's environmental and social risks. This Stakeholder Engagement Plan (SEP) outlines when and how stakeholders will be involved throughout the project's life cycle. The SEP considers the unique characteristics and interests of stakeholders, tailoring the level of engagement and consultation to suit their needs. Additionally, it details the timing and scope of information shared with different stakeholders and outlines the types of information to be gathered from them. Continuous updates to the SEP document will occur throughout the project implementation period. This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with

stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

The objectives of the Stakeholder Engagement Plan (SEP) are as follows:

- To establish a systematic approach to stakeholder engagement that will help TKYB to identify all stakeholders and build and maintain a constructive relationship with them.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with direct stakeholders throughout the project lifecycle on issues that could potentially create an impact.
- To ensure that relevant 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 stakeholders with accessible and inclusive means to raise issues and grievances and allow TKYB to respond to and manage such grievances.

3. Stakeholder identification and analysis per project component

3.1 Methodology

For the Türkiye Industrial Emission Reduction Project, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties (as defined in section 3.2), other interested parties (as defined in section 3.3) and disadvantaged/vulnerable individuals or groups (as defined in section 3.4).

3.2. Affected parties

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

Direct Affected Stakeholders:

- **Sub-Project Companies:** All companies which the qualified companies, which will lend funds from TKYB the scope of the project falls within the direct stakeholders. It is planned that the institutions financing the project will serve as examples in the relevant matter and set an example for other companies.
- **Workers:** All employees who provide and will provide the workforce are considered as one of the main stakeholders of the project. Due to the establishment of a Key Performance Indicator (KPI) for female employees and its monitoring, they will be both beneficiaries and direct stakeholders of the project.
- **Affected Citizens:** All residents living around the projects planned to be funded will be considered direct stakeholders of the project. Due to the project's emission reduction, they are intended to be the individuals who will experience the maximum positive impact, and this matter will be periodically monitored.

3.3. Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including:

Indirect Affected Stakeholders:

- National authorities involved with the program: The Ministry of Treasury and Finance, Social Security Institution (SGK), The Minister of Environment Urbanization and Climate Change, the Ministry of Industry and Technology (MoIT), Presidency of Republic of Turkey, The Minister of Energy and Natural Resources and related NGOs.
- Local authorities in the provinces of Türkiye currently 81 in number: (Adana, Adıyaman, Afyonkarahisar, Ağrı, Aksaray, Amasya, Ankara, Antalya, Ardahan, Artvin, Aydın, Balıkesir, Bartın, Batman, Bayburt, Bilecik, Bingöl, Bitlis, Bolu, Burdur, Bursa, Çanakkale, Çankırı, Çorum, Denizli, Diyarbakır, Düzce, Edirne, Elazığ, Erzincan, Erzurum, Eskişehir, Gaziantep, Giresun, Gümüşhane, Hakkâri, Hatay, İğdır, Isparta, İstanbul, İzmir, Kahramanmaraş, Karabük, Karaman, Kars, Kastamonu, Kayseri, Kilis, Kırıkkale, Kırklareli, Kırşehir, Kocaeli, Konya, Kütahya, Malatya, Manisa, Mardin, Mersin, Muğla, Muş, Nevşehir, Niğde, Ordu, Osmaniye, Rize, Sakarya, Samsun, Şanlıurfa, Siirt, Sinop, Sivas, Şırnak, Tekirdağ, Tokat, Trabzon, Tunceli, Uşak, Van, Yalova, Yozgat, Zonguldak)

3.4. Disadvantaged / vulnerable individuals or groups¹

Within the Project, the vulnerable or disadvantaged groups may include but are not limited to the following: Particular disadvantaged or vulnerable individuals and groups in the context of this project would be women, youth, children, refugees, and disabled, who experience a higher-than-average unemployment or are in informal employment characterized by less pay, and possibly under exploitative conditions and generally have less means and opportunity to express their concerns, or access information to understand their rights or the impact of the project. The disadvantages experiences by these groups are frequently compounded by less awareness of their rights according to the Labor Law, less access to information due to language or reduced mobility, low skills and low relevant job experience, and prevailing social norms inhibit their gainful employment.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted below;

Table 1: Summary of Previous Meetings with Associations

Location	Date	Association / Minister	Participants	Key Points of Discussion	Feedbacks
Conference	30.11.2023	Ministry of Environment, Urbanization and Climate Change	Related Companies, Banks National Organizations NGOs Public Institutions	Within the scope of the DIES Project, the 2nd Workshop for the preparation of the "Draft National Action Plan for Determining Turkey's Emission Strategy" was held with the theme of Preparing the National Action Plan for Green Transformation in Industry.	-
Online	11.12.2023	Turkish Foundry Manufacturers Association	Tunçağ Sen (Secretary General) Yurdem Demir (TKYB- Corporate Marketing Department Manager) Cansu Eroğlu (TKYB- Corporate Marketing Expert) Aydan Çalıcıoğlu (TKYB – Environmental Engineer) Cihan Altınbaş (TKYB – Social Expert) Tuğçem Yılmaz (TKYB Corporate Marketing Department Analyst)	The project introduction has taken place The current state of the foundry sector in Turkey environmentally and socially Energy Efficiency and the Practices of Companies How environmental and occupational safety issues are managed and what TÜKOSAD is doing Points of need in environmental and social matters and the potential for creating a positive impact.	The current issues causing the most difficulties are; Human Resources (a significant loss of workers due to EYT). There are deficiencies in automation. There is a need for digitization.
Online	13.12.2023	Turkish Aluminum Industrialists Association	Duygu Seymen (Assistant Secretary General -TALSAD) Yurdem Demir (TKYB- Corporate Marketing Department Manager) Cansu Eroğlu (TKYB- Corporate Marketing Expert) Aydan Çalıcıoğlu (TKYB – Environmental Engineer) Cihan Altınbaş (TKYB – Social Expert) Tuğçem Yılmaz (TKYB Corporate Marketing Department Analyst)	The project introduction has taken place Summary of projects carried out within the association Emission reduction as one of the most crucial topics, the status of companies in terms of occupational health and safety and waste management Whether there will be an impact on local residents, employees, and similar issues within the scope of the project	Due to being a member of European Aluminium and its international initiatives, emphasis is placed on and developed in various topics. Carbon calculations are being conducted by selecting pilot companies. It is stated that comments cannot be made on social issues, but the importance of the issue may increase with legal processes.
Online	15.12.2023	Turkish Cement Industrialists Association	Kerem Erşen (Economic Evaluations Manager) Canan Demiröz (Environment and Climate Change Manager) Cansu Eroğlu (TKYB- Corporate Marketing Expert) Aydan Çalıcıoğlu (TKYB – Environmental Engineer) Cihan Altınbaş (TKYB – Social Expert) Tuğçem Yılmaz (TKYB Corporate Marketing Department Analyst)	The project introduction has taken place. What the industry is doing and its needs regarding carbon reduction. Information regarding the awareness level. Activities conducted by the association. Within the scope of the project, the industry's readiness for environmental-social-occupational health and safety issues and sustainability.	Most of the companies within their structure are knowledgeable about carbon reduction. Informative training sessions are organized, and despite prejudices, the sector is proactive in addressing these issues. Many companies publish sustainability reports, indicating readiness for the implementation of environmental-social issues.
Online	26.12.2023	All Waste and Environmental Management Association	Betül Küçükay (Association Secretary General) Yurdem Demir (TKYB- Corporate Marketing Department Manager) Cansu Eroğlu (TKYB- Corporate Marketing Expert) Aydan Çalıcıoğlu (TKYB – Environmental Engineer) Tuğçem Yılmaz (TKYB Corporate Marketing Department Analyst) Galip Tekiner (Oyak Cement) Ömer Benli (Benli Recycling) (Waste separation facility) Muhammet Sayaç & Savaş Akpolat (İzmit Waste and Waste Treatment Incineration and Evaluation Inc.-izaydaş) Bekir Tombul (İSTAÇ, a subsidiary of Istanbul Metropolitan Municipality) Sevda Özbaşaran (Eren Holding) Mert Koral (INEVA Environmental Technologies) Mert Karaosmanoğlu (Biotrend Energy) Betül Çarkacı (Exitcom- Waste recycling company) Emre Sezgin (Akfensu- Water, wastewater and environmental infrastructure projects for facilities)	The project introduction has been conducted. Activities carried out by the association. Whether there are efforts and initiatives related to emission reduction in companies with suppliers in Europe. The current status of companies in terms of emission reduction and their environmental and social standings.	The association's activities were explained, and there are companies within the organization contributing to emission reduction. There is no such obligation for suppliers, but when working with global companies, emission reduction becomes a topic. Training sessions and workshops are organized on environmental, social, and occupational health and safety issues. It was mentioned that members comply with ISO standards and are certified.

The photos which were taken on the meetings was added at the end of SEP (Annex 3)

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

The Stakeholder Engagement Plan below outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Table 2: SEP Summary Table

Project stage	Target stakeholders	Topic of consultation / message	Method used	Responsibilities	Frequency/Timeline
Design and negotiation	National authorities	Project design and negotiations	Office meetings	TKYB PIU implementations of the Project, the risks and effects of the project	2023
Design and negotiation	Beneficiary private enterprises	Stakeholder Engagement Plan, ESMS documents	Written information, electronic Information	TKYB PIU to apprise target beneficiaries and communities of project activities, potential environmental and social risks	December 2023-January 2024
Design and negotiation	Industrial Associations	Project design documents	Written information, electronic Information & Consultation Meetings	TKYB PIU to apprise the Industrial Associations capability to be involved in the TIERP and develop a methodology to reach out the final beneficiaries	On-going
Design and negotiation	Associations, Industrial Associations	The project explanation, effectiveness of environmental-social-ohs implementations	Online	TKYB PIU collects feedbacks from the associations	December 2023
Design and Implementation	Beneficiary private enterprises	Non-technical project summary; press releases, project websites and project social media channels	emails	TKYB PIU to create awareness and to collect feedback from the site	As needed
Implementation Stage	Vulnerable groups (women, youth, children, disabled etc.) potential direct beneficiaries	Non-technical project summary; press releases, project websites and project social media channels	Written information, electronic Information	TKYB PIU will update TKYB PIU website for project related information	As needed
Implementation	WB	Project implementation progress with key indicators	Written information, electronic Information, meetings	TKYB PIU to report project implementation progress	Semiannual TKYB office, Video Conferences

4.3. Proposed strategy to incorporate the views of vulnerable groups

The project will seek the views of women, youth, children, refugees, and disabled through the following methods.

The details of strategies adopted to engage and communicate to vulnerable groups effectively will be considered during project implementation. Mechanisms to be considered may include (but not limited to) (i) women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate; consider provisions for childcare, transport, and safety for any in-person community engagement activities; (ii) Pregnant women: develop education materials for pregnant women on basic hygiene practices, infection precautions, and how and where to seek care based on their questions and concerns; (iii) Elderly and people with existing medical conditions: develop information on specific needs and explain why they are at more risk & what measures to take to care for them; tailor messages and make them actionable for particular living conditions (including assisted living facilities), and health status; target family members, health care providers and caregivers; (iv) People with disabilities: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology; and (iv) Children: design information and communication materials in a child-friendly manner & provide parents with skills to handle their own anxieties and help manage those in their children.

5. Resources and Responsibilities for implementing stakeholder engagement

5.1. Implementation Arrangements and Resources

The TKYB will be in charge of stakeholder engagement activities. The entities responsible for carrying out stakeholder engagement activities will be established within TKYB, with the involvement of full-time dedicated staff from various departments. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director.

The project's stakeholder engagement implementation arrangements are as follows:

Actor/Stakeholder	Responsibilities
TKYB PIU	Planning and implementation of the SEP Leading stakeholder engagement activities with development partners, the private sector and coordination on resolution of grievances Monitoring of and reporting on environmental and social performance to the World Bank Consolidated reporting on SEP activities for the project overall Make available the disclosed ESMS documents

The stakeholder engagement activities will be documented through;

Depending on level of finance (direct finance by TKYB) the stakeholder engagement activities will be monitored by TKYB PIU. TKYB PIU will track the progress of the SEP as well as the feedback and grievances received. All records related with the SEP activities at Project level will be reported to TKYB regularly with other project progress information. All project engagement records including GRM specific information will be kept by TKYB PIU.

6. Grievance Mechanism

A Grievance Mechanism is a system that allows not only grievances, but also queries, suggestions, positive feedback, and concerns of project-affected parties related to the environmental and social performance of a project to be submitted and responded to in a timely manner.

6.1. Description of Grievance Mechanism (GM)

TKYB has online communication and project GRM in place and approved policy documents to regulate and address grievances for all project stakeholders including its employees. A new procedure called “Grievance Redress Mechanism for IFIs financed projects” has been introduced recently. In line with the requirements of ESS.10 (Stakeholder Engagement and Information Disclosure), the project specific grievance mechanisms will be open to the use of all stakeholders and it can be used to deliver any possible message, complaint and/or suggestion by any stakeholder via TKYB corporate website and other channels defined in the mechanism. In the context of the Project, we are expecting to receive any kind of feedbacks from final beneficiary SMEs, LEs and also Project Affected Parties (PAPs) who may be impacted from the project; and other interested parties who may have an interest in the project (Figure 2).

In line with the requirements of ESS.2 (Labor and Working Conditions), TKYB has an internal employee grievance mechanism and procedure for its employees. On the intranet page of TKYB, employees are able to submit their grievances from the notification menu, which may be related to 1. Ethics, 2. Whistle-blowing, 3. Suspicious transactions, 4. Complaints and suggestions. Each grievance will be processed according to internal employee grievance procedure, which can be directed to the CEO in case of ethics related grievances; to the Board of Auditors in case of whistle-blowing related grievances; to the Compliance Officer (Head of Internal Control and Compliance department) in case of suspicious transactions related grievances and to human resources department in case of other complaints and suggestions (Figure 3).

If there are any non-staff project workers/consultants hired for specifically for this project, they will also be informed about the internal employee grievance mechanism at the time of recruitment and will be provided subject specific e-mail addresses for ethics and whistle-blowing related grievances. They will also be able to use the project GRM for their general complaints and suggestions.

The GRM's steps are explained below;

4 Example of GRM process:

Step 1: Submission of grievances

Step 2: Recording of grievance

Step 3: Investigating the grievance and preparing the draft response

Step 4: Complainant Response within 30 days

GRM process for project stakeholders:

The GRM for all project stakeholders is accessible via TKYB's official website and aims to collect and address grievances of TKYB's clients and all other stakeholders. The responsible body

governing this grievance process is TKYB's Internal Control and Compliance Department, which reports directly to the Audit Committee of the Bank. All inquiries/grievances received are directed to the Internal Control and Compliance Department where the relevant inquiry/grievance is reviewed by them and directed to the relevant responsible department to be responded maximum within 30 days unless any other time period is required legally. For the project GRM, all project related grievances that are directed to relevant departments by Internal Control and Compliance department, will also be reported to TKYB PIU for project information and reporting purposes.

The GRM Forms are available both in Turkish and English;

English link: <https://kalkinma.com.tr/en/contact-us/contact-information>

Turkish link: <https://kalkinma.com.tr/tr/bize-ulasin/iletisim-bilgileri>

As this GRM is a part of the regulatory framework applied by Banking Regulation and Supervision Agency of Turkey (regulation on Internal Processes and Internal Capital Adequacy Assessment Process) all banks in Turkey, are subject to this regulation. Thus, TKYB's PIU is expected to have similar functioning GRMs in place. The project GRM will utilize existing grievance channels of TKYB, but will also be improved through adjustments to collect, manage and monitor project specific grievances. If any of the selected projects is missing some features of this GRM, they will be asked to upgrade and improve their GRM to match the requirements of ESS10 and as specified in the SEP and Project Operational Manual (POM).

The project PIU will be the designated department for reporting all project related inquiries that will be directed and shared by Internal Control and Compliance Department and will simultaneously keep the records and reports of all grievances. PIU will be informed in each of these cases:

- Submission and recording of project related grievance
- Preparation of draft response by relevant department
- Approval of legal opinion
- Completion of complainant response

Internal Control and Compliance Department documents the actions and counter actions taken, and the responses provided to the applicant/complainant, including for project grievances and report to Audit Committee, Board of Internal Auditors and CEO on a monthly basis. These monthly reports related to project grievances will be shared with TKYB PIU for project reporting purposes.

Project GRM will be used to submit complaints related to the overall management and implementation of the project, including: violation of project policies, guidelines, or procedures, including those related to child labor, health and safety of workers, work place harassment (mobbing, sexual harassment etc.). The GRM will also allow submission of anonymous grievances. The attached grievance form in Annex 1 will be utilized in the project and allow submission of anonymous grievances.

Step 1: Submission of grievances

Existing GRM has four different channels to receive grievances:

- Complaint form: By filling complaint form

(<https://kalkinma.com.tr/en/contact-us/contactinformation>)

- Fax: By sending fax through +90 (216) 6301815-0216 6346145
- E-mail: By sending e-mails to the Bank and staff
- Postal mail: By applying to the Bank with a petition

In case a compliant would like to submit a grievance via telephone, he/she will be directed to fill in the compliant form on the website.

Complainant can also categorize the grievance by project name (When it is applicable as World Bank Türkiye Industrial Emission Reduction Project or others) via a drop-down menu in complainant form.

When the grievance form is completed with the subject and other information required, it is delivered to Internal Control and Compliance Department to be recorded, classified and communicated with other relevant departments to be responded. All grievances regardless of the channel received must be delivered to Internal Control and Compliance department and recorded in the same day of receipt.

In addition to the project specific TKYB GRM, the national grievance mechanism will be one of the tools that the project GRM will feed from. TKYB may receive formal requests and grievances through the Presidential Communication Center (CIMER) on different types of complaints related to the project. In practice, CIMER (Phone: 150, web: <https://www.cimer.gov.tr/>) is only available to Turkish citizens. However, project GRM will also utilize a second national level tool namely YIMER (Foreigners Communication Center) to collect grievances from foreigners including refugees. YIMER (Phone: 157, web: <http://yimer.gov.tr>) which also serves on a 7 day/24 hours basis, is freely accessible in six languages including, Turkish, Russian, Arabic, Farsi, German, and English. Project related grievances received through CIMER and YIMER will also be recorded by designated staff in TKYB PIU to timely inform the project on taking corrective actions. Both CIMER and YIMER will complement project GRM throughout project life. Project related grievances received through CIMER and YIMER will also be recorded by Internal Control and Compliance department and processed similarly with project GRM. CIMER and YIMER will complement project GRM throughout project life.

Step 2: Recording of grievance

Once a grievance is received, the Internal Control and Compliance Department is responsible for recording, directing, ensuring and controlling those grievances are replied within required time periods and reporting the analysis of grievances in terms of category and quantity to the Audit Committee and CEO. In the cases of project related grievances, these reports will be shared with TKYB PIU on a monthly basis. Internal Control and Compliance Department will also inform PIU about each recording of project related grievance at the same day of submission.

Step 3: Investigating the grievance and preparing the draft response

Once the project-specific grievances directed from Internal Control and Compliance Department to the related department and TKYB PIU, the related department is responsible for preparing a draft response letter and inform Internal Control and Compliance Department and PIU. Before preparing the draft response, related department will communicate the initial response informing about the acknowledgement of the submission of the grievance and legal response time.

According to TKYB internal regulation for Customer Grievance Management Policy document all responses for customer complaints must be reviewed by the Department of Legal Counselor. The related department prepares the draft response and proceeds to receive legal opinion.

Step 4: Complainant response within 30 days

The draft response will be reviewed and revised according to legal opinion and all internal approval procedure will be completed before communicating the final response by the related department. The response for the grievance is given from the same channel that the complaint was received. All project-related responses will be answered by related department and PIU will be informed about the response in detail. All grievances should be responded within 30 days provided that the legal period is not exceeded.

After all possible redress has been proposed to the complainant, and the complainant is still not satisfied with the proposed resolution, they shall be able to seek the legal recourse by means of judicial system and remedies.

Information about the project's GRM will be publicized as part of the initial feedback consultations in the project and information about the GRM will also be posted online on the TKYB website.

Monitoring and Reporting Grievances

The TKYB PIU's GRM focal point, who will also be the Communications and Stakeholder Specialist, will be responsible for all project related grievances:

- Analyzing the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them;
- Submitting quarterly reports on GRM mechanisms to the Project Coordinator at the PIU.

Semi-annual progress reports to be submitted by the PIU shall include a section related to GRM which provides updated information on the following:

- Status of GRM implementation (procedures, training, budgeting etc.),
- Qualitative data (gender disaggregated) on number of received grievances / (applications, suggestions, complaints, requests, positive feedback),
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved,
- Level of satisfaction by the measures (response) taken,
- Any correction measures taken.

Results will be posted on the TKYB website.

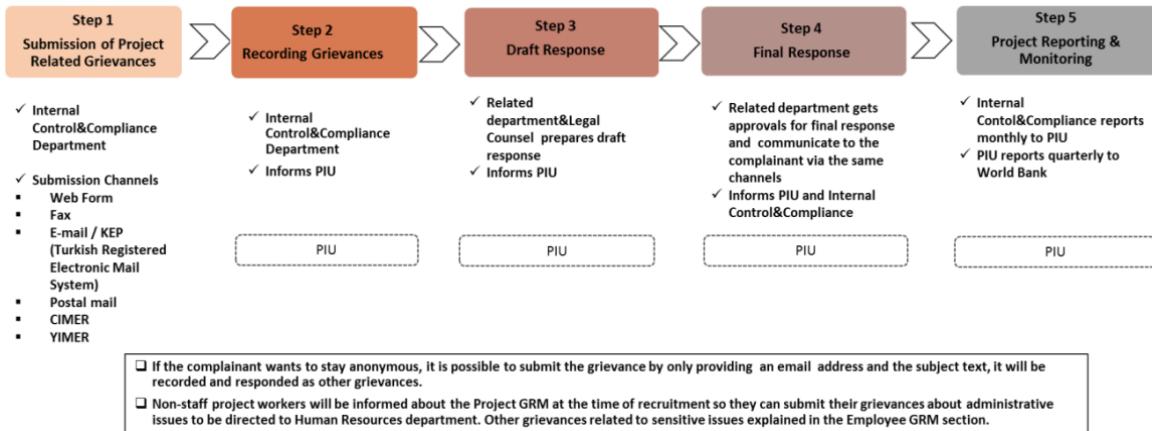


Figure 2: Project GRM for Stakeholders (project-affected & other interested parties) in line with ESS.10

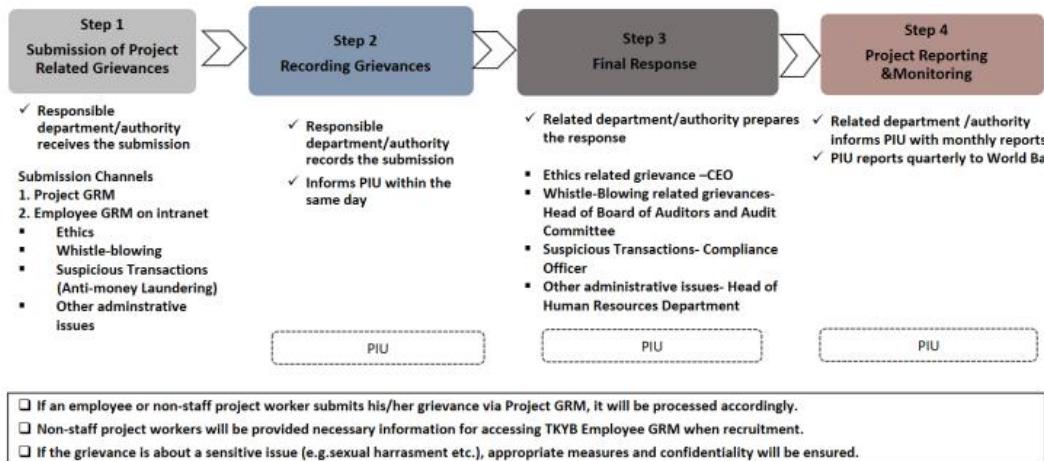


Figure 3: GRM Process for Project Workers (employees and non-staff project workers) in line with ESS.2

The World Bank Grievance Redress System

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

Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redressservice>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

The Sexual Exploitation and Abuse/Sexual Harassment complaints will be safely and ethically received and managed, through the different stages of the GM. This issue is already integrated into TKYB's HR Policy and it supports by the laws. This topic follows efficiently in general, one of the important topics for TKYB and Republic of Türkiye.

7. Monitoring and Reporting

7.1. Summary of how SEP will be monitored and reported upon (including indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Indigenous Peoples Plan, or SEA/SH Action Plan, if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in Annex 2.

7.2. Reporting back to stakeholder groups

The SEP will be revised and updated as necessary during project implementation.

Once in a year summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the project managers.

Specific mechanisms to report back to the stakeholders include the following e-mail, phone, face-to-face, and other related ways have been/will be consulted. This reporting back to the stakeholders will be Once in a year of such reporting.

ANNEXES

Annex 1. Template to capture minutes/records of consultation meetings

Annex 2. Sample Table: Monitoring and Reporting on the SEP

Annex 3. Photos from the Stakeholder Meetings

Annex 4. Sample Grievance Form and Grievance Closeout Form

Annex 1: Template to Capture Consultation Minutes

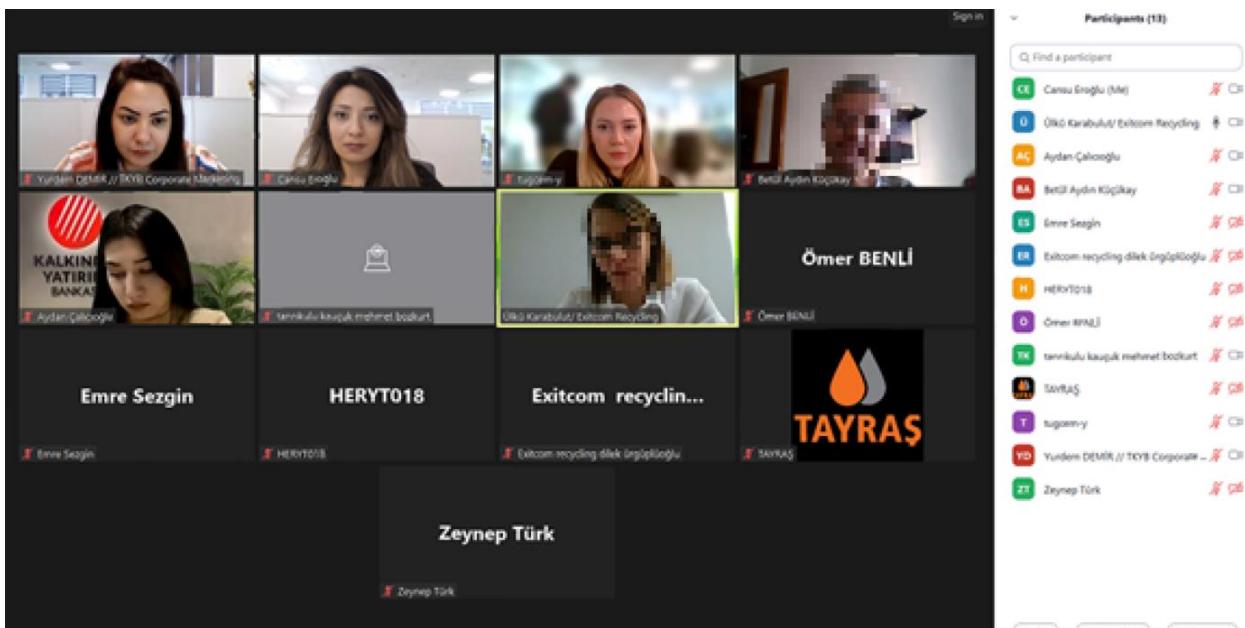
Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
Turkish Foundry Manufacturers Association	The current issues causing the most difficulties are; Human Resources (a significant loss of workers due to EYT). There are deficiencies in automation. There is a need for digitization	The project will create job opportunity, and will make an advertisement of the project. The project will be about the Emission Reduction, the other issues can be implemented into the project.	Periodically communication will be conducted about the situation of Project. Also, the feedback will be collected.
Turkish Aluminum Industrialists Association	Due to being a member of European Aluminium and its international initiatives, emphasis is placed on and developed in various topics. Carbon calculations are being conducted by selecting pilot companies. It is stated that comments cannot be made on social issues, but the importance of the issue may increase with legal processes.	TIER Project will supply a national and international environmental & social standards to the Companies.	Periodically communication will be conducted about the situation of Project. Also, the feedback will be collected.
Turkish Cement Industrialists Association	Most of the companies within their structure are knowledgeable about carbon reduction. Informative training sessions are organized, and despite prejudices, the sector is proactive in addressing these issues. Many companies publish sustainability reports, indicating readiness for the implementation of environmental-social issues.	The companies will have an opportunity to learn, experience the international standards. Also, the project will be an opportunity as a training for the companies.	Periodically communication will be conducted about the situation of Project. Also, the feedback will be collected.
All Waste and Environmental Management Association	The association's activities were explained, and there are companies within the organization contributing to emission reduction. There is no such obligation for suppliers, but when working with global companies, emission reduction becomes a topic. Training sessions and workshops are organized on environmental, social, and occupational health and safety issues. It was mentioned that members comply with ISO standards and are certified.	The companies will have an opportunity to learn, experience the international standards. The emission reduction will be more important topic with the project.	Periodically communication will be conducted about the situation of Project. Also, the feedback will be collected.
Ministry of Environment, Urbanization and Climate Change		Within the scope of the DIES Project, the 2nd Workshop for the preparation of the "Draft National Action Plan for Determining Turkey's Emission Strategy" was held with the theme of Preparing the National Action Plan for Green Transformation in Industry.	The feedbacks are collected, There is no require a action.

Annex 2. Sample Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>GRM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Is project affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the villages/project communities. • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	Records from the implementing agency and other relevant agencies
<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	Stakeholder Consultation Attendance Sheets/Minutes Evaluation forms Structured surveys Social media/traditional media entries on the project results
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	Communication Strategy (Consultation Schedule) Periodic Focus Group Discussions Face-to-face meetings, online meetings and/or Focus Group discussions with Vulnerable Groups or their representatives

Annex 3. Photos from the Stakeholder Meetings







Annex 4. Sample Grievance Form and Grievance Closeout Form

ANNEX 1. SAMPLE GRIEVANCE FORM AND GRIEVANCE CLOSEOUT FORM			
GRIEVANCE FORM			
Project Name	Complainant Status	Grievance Subject/Category	
Name of person receiving grievance:		Date:	
Title: Ms./Mr.			
INFORMATION ABOUT COMPLAINANT		Ways of Receiving Grievance	
<i>(This section may not be filled if the complainant wishes to remain anonymous but in any case an email for communication purpose must be provided)</i>			
Name		Surname	
Gender		Phone	<input type="checkbox"/>
Phone number		Information Meetings	<input type="checkbox"/>
Address		Application to Office	<input type="checkbox"/>
District/Neighborhood		Mail/e-mail	<input type="checkbox"/>
Email		Field visit	<input type="checkbox"/>
Signature (if possible)		Other:	<input type="checkbox"/>
DETAILS OF GRIEVANCE			
<p> </p> <p> </p> <p> </p>			

GRIEVANCE CLOSEOUT FORM		
ASSESSMENT OF THE GRIEVANCE		
Corrective Action Required:	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	Please describe the action if it is required to close-out the case	
RESULT		
CLOSEOUT <i>This part will be filled in and signed by the complainant and the complaint evaluation committee when the corrective action or file is closed-out. (Instead of taking the signature of the complainant, receipt or other supplementary documents can be attached to the form in order to verify that the file has been closed-out.)</i>		
Responsible Person	Complainant	
Name-Surname	Name-Surname	
Date and Signature	Date and Signature (If possible)	