



**REPUBLIC OF TURKEY
MINISTRY OF INDUSTRY AND TECHNOLOGY**

TURKEY ORGANIZED INDUSTRIAL ZONES PROJECTS

STAKEHOLDER ENGAGEMENT PLAN

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GLOSSARY

Consultation: The process of gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.

Dialogue: An exchange of views and opinions to explore different perspectives, needs and alternatives, with a view to fostering mutual understanding, trust and cooperation on a strategy or initiative.

Grievance Mechanism: It is a mechanism that has been developed for potential use by project stakeholders to achieve mutually agreed resolutions for their grievances. It ensures that complaints and grievances are addressed through a transparent and impartial process.

Local communities: Refers to groups of people living in close proximity to the project locations that could potentially be impacted by a project. ("Stakeholders," refer to the broader group of people and organizations which are directly involved and /or have an interest in the project.)

Organized Industrial Zones (OIZ): the good and service production zones, which are formed by allocating the land parcels, the borders of which are approved, for the industry in a planned manner and within the framework of certain systems by equipping such parcels with the necessary administrative, social, and technical infrastructure areas and repair, trade, education, and health areas as well as technology development regions within the ratios included in zoning plans and which are operated in compliance with the provisions of this Law in order to ensure that the industry gets structured in approved areas, to prevent unplanned industrialization and environmental problems, to guide urbanization, to utilize resources rationally, to benefit from information and informatics technologies, and to ensure that the types of industries are placed and developed within the framework of a certain plan

Partnerships: In the context of engagement, partnerships are defined as collaboration between people and organizations to achieve a common goal and often share resources and competencies, risks and benefits.

Stakeholder: Refers to individuals or groups who: (a) are affected or likely to be affected by the project (*project-affected parties*); and (b) may get involved directly or/and have an interest in the project (*other interested parties*).

Stakeholder engagement: It is a continuous process used by the project to engage relevant stakeholders to generate sense of ownership to the project and for a clear purpose to achieve accepted outcomes. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, stakeholder involvement in project monitoring, reporting to stakeholders and management functions. It includes both state and non-state actors.

Stakeholder Engagement Plan (SEP): SEP is a useful tool for managing communications with the project stakeholders. The goal of this SEP is to improve and facilitate decision making and create an atmosphere of understanding that actively involves project-affected people and other stakeholders in a timely manner, and that these groups are provided sufficient opportunity to voice their opinions and concerns that may influence Project decisions.

Project: Refers to Turkey Organized Industrial Zones Project

ACRONYMS AND ABBREVIATIONS

CIP	Community Implementing Partner
CSO	Civil Society Organization
DA	Development Agency
DGoIZ	Directorate General of Industrial Zones
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
EDIC	Eskişehir Design and Innovation Center
EOSB	Eskişehir Organized Industrial Zone
ETGB	Eskişehir Technology Development Zone
EU	European Union
FDI	Foreign Direct Investments
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GOIZP	Green Organized Industrial Zones Project
GoT	Government of Turkey
IPA	EU Instrument for Pre-accession Assistance
KOSGEB	Small and Medium Enterprises Development Organization of Turkey
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MoIT	Ministry of Industry and Technology
MoTF	Ministry Of Treasury And Finance
MoENR	Ministry of Energy and Natural Resources
MoEU	Ministry of Environment and Urbanization
NGO	Non-Governmental Organization
OIP	Other Interested Parties
OIZ	Organized Industrial Zones

OIZSO	Organized Industrial Zones Supreme Organization
PAP	Project Affected Parties
PIU	Project Implementation Unit
R&D	Research and Development
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SMEs	Small and Medium Sized Enterprises
TA	Technical Assistance
TOBB	The Union of Chambers and Commodity Exchanges of Turkey
TRL	Technology Readiness Levels
TUBITAK	The Scientific and Technological Research Council of Turkey
UNDP	The United Nations Development Programme
WB	World Bank

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1. INTRODUCTION / PROJECT DESCRIPTION

a. Introduction

The concept of organized industrial zones (OIZs) in Turkey was first used in 1961 during the First Five Year Development Plan (1963-1967). In the said plan, the following statement is given under the heading of Incentive Measures: "Investments in underdeveloped regions will be given tax deductions, investments will be encouraged to flow into regions that are not able to use these opportunities, and industrial zones will be established in centers where such opportunities are abundant, investments will be encouraged to flow in regions that have not been able to use these opportunities, and the establishment of industrial zones in centers where such facilities are abundantly collected. The state will give priority to these areas in the necessary infrastructure investments." The aim of supporting the Organized Industrial Zone in Turkey, the region is to overcome the international economic disparities. It is noteworthy that the first emergence of the idea of OIZ is a balanced development policy tool rather than a spatial regulation tool. The concept of OIZ was included in all of the later development plans. In subsequent Development plans, industrial zones were frequently included as an important policy for the purpose of eliminating the difference in regional development, accelerating industrialization, spatial planning of development and industry and reducing environmental impacts.

The first OIZ was established in Bursa in 1961, and they have since spread throughout the country. As of today (September 2020), there are 341 OIZs in 81 cities (of which about 250 are operational). In 2019, there are around 53,000 businesses employing more than 1.8 million people in OIZs in Turkey. Besides contributing to industrialization and technological development, OIZs constitute an engine for job creation. OIZs in Turkey are typically established using a public-private partnership model. Initially, OIZs have a higher share of public ownership and control; the balance then shifts to the private sector as the zone develops.

The 11th Development Plan targets boosting manufacturing competitiveness and efficiency through upgrading the infrastructure and services offered by zones. For example, the Plan envisions the establishment of Innovation Centers in OIZs to support tenant companies on business development, innovative technologies, lean production, efficiency, technology management, clustering and digitalization.

These can take the form of OIZs, industrial parks, special economic zones, free zones, etc. Such zones can help overcome barriers to business development, such as excessively strict regulations, poor infrastructure, and inadequate access to logistics for international trade. Zones can provide a more favorable business environment in a geographically limited area, for instance, through a more efficient legal and regulatory framework, high quality public services, and better infrastructure such as roads, energy sources, water, and wastewater treatment facilities. This in turn can help the firms located in the zones to be more productive, as well as more energy efficient and environmentally friendly. On the other hand, zones can be poorly executed by not considering private sector demand or addressing market and government failures. Such zones risk becoming a burden on government finances.

Infrastructure includes roads, water, natural gas, electricity, communications, waste treatment, and other services. Firms operating in OIZs can also benefit from a range of fiscal and financial benefits.

b. Project Overview

The Project would have two major components: Component 1: Supporting infrastructure and the enabling environment for OIZ sustainability, competitiveness, and efficiency; and Component 2. Technical assistance and capacity building. Each component is consisted of several sub-components.

Component 1: Supporting infrastructure and the enabling environment for OIZ sustainability, competitiveness, and efficiency. This component would have the following three sub-components: (i) supporting investments in basic OIZ infrastructure, utilizing “green” technologies; (ii) supporting investments in innovative green infrastructure in OIZ (such as improved energy and water efficiency, renewable energy investments, advanced water and wastewater treatment facilities, LED lighting and using waste/by-products as productive inputs (e.g., steam highways)); and (iii) supporting investments in OIZ innovation centers, including model factories to demonstrate new technologies and new practices, skills upgrading, standards and testing services for SMEs, and programs which would help link firms in the OIZs to local universities and research institutes to help them introduce or commercialize innovative ideas.

Sub-component 1.1: Supporting investments in basic OIZ infrastructure, leveraging “green” solutions^[SV1] to the extent possible . This subcomponent would support more traditional, basic OIZ infrastructure, especially in less developed OIZs/regions. Examples include roads, power, water/gas supply, communications networks, and administrative buildings. The finance would be directed at infrastructure investments in OIZs that meet pre-defined criteria for sustainability, competitiveness, and efficiency. This could help bring investors and jobs to the zones by offering an attractive investment environment. Social infrastructure, such as childcare facilities to facilitate women’s employment, could also be supported. The subcomponent could support investments that the MoIT has approved (and are hence included in the Ministry’s Investment Program) but have not yet been initiated. There are currently 83 approved basic OIZ infrastructure projects (not including OIZs in the Ergene region) in the MoIT’s pipeline, requiring investments of about 4 billion TL (US\$ 720 million).¹ Economic rate of return would likely be a key criterion for choosing which basic infrastructure investments to finance.

Sub-component 1.2: Supporting investments in green infrastructure in OIZ). The focus will be on improved resource efficiency (efficient use of materials, energy, water, infrastructure, and natural resources), renewable energy investments and industrial symbiosis. This sub-component would support OIZ investments in more advanced infrastructure (where there has historically been little focus). This includes green infrastructure and competitiveness infrastructure and related services. Given the positive externalities and less traditional, more innovative and experimental (in some cases) nature of these investments, more concessional terms might be required for the MoIT’s lending scheme. Examples include investments in energy supply from renewable sources (e.g. rooftop solar photovoltaic, biogas, solar wall), LED street lighting, advanced wastewater treatment, improved energy efficiency of administrative buildings, and recycling/reusing waste materials for production inputs (e.g. steam highways). It could also include investments to facilitate industrial symbiosis between two or more firms, e.g. pipes to share heat/steam that is a by-product of one industrial process and needed as input to another. Green infrastructure would have both environmental and competitiveness benefits by reducing raw material, electricity, water, and waste disposal expenditures for OIZ management and resident firms. The infrastructure improvement would also be expected to help zones obtain a “Green OIZ” certification.

¹ Data provided by the MoIT OIZ Directorate General (June 2019)

Sub-Component 1.3: Supporting investments in OIZ innovation centers . This sub-component will help to improve the capacity of innovation centers within OIZs, by establishing competitiveness infrastructures and services, and programs linking firms in the OIZs to local universities and research institutes to help them introduce or commercialize innovative ideas and different technologies on earlier technology readiness levels (TRL). This subcomponent will help with conducting feasibility studies (assessment of potential location, target sectors, types of service to be deployed including *inter alia* consultancy, trainings, and research areas, etc.) with further development of business plans for the innovation centers. Examples include investments in shared-use facilities for skills training/education, R&D, product standards and testing services, and model factories to demonstrate new technologies and new practices, etc. The facilities could be used to help firms increase their productivity, efficiency, innovation capacity, product quality, level of digitization, and management capacity in line with the emerging trends of Industry 4.0. The purchase of materials, equipment, and training curricula development could also potentially be covered, as could the delivery of training and consulting services to OIZ firms.

Component 2: Technical assistance and capacity building This component would have the following two sub-components: (i) technical assistance and capacity building for MoIT and OIZs; and (ii) project management and support to the Project Implementation Unit (PIU) to be established in MoIT.

Sub-component 2.1: Technical assistance and capacity building for MoIT and OIZs. This sub-component would support establishing a regime to strengthen the institutional and regulatory frameworks for OIZs (including innovation centers) and setting forth key performance indicators in Green OIZ applications. Technical assistance needed for upgrading OIZ and firm sustainability and competitiveness, including the following:

- A review of the existing policy and incentive framework related to OIZ (including OIZ innovation centers) to identify possible gaps for improvement, and providing necessary assistance in implementing such improvements, which can be first tested in the selected pilot site(s). For example, for the OIZ innovation centers, currently there are few FDIs present in the innovation centers and the linkage between innovation centers and R&D institutes and universities is weak, new policies and strategies are needed to support firm-academia linkage, FDI attractions and international collaborations. In addition, removal of certain policy restrictions could make the innovation centers more conducive and productive.
- Technical assistance and capacity building to the MoIT (Directorate General of Industrial Zones) and OIZ practitioners on preparing, assessing, and evaluating investment proposals, and setting key performance indicators. Activities could include establishing a pool of experts at MOIT who are experienced in technical consultancy (i.e. technical audits and feasibility studies) regarding tangible, eco-industrial opportunities and practices identified in the Green OIZ Framework as well as international practices and provide required learning sessions to them to undertake future activities in MOIT relevant to Green OIZ Framework.
- Support to implement of a national Green OIZ framework at institutional level. A draft Green OIZ framework was developed under an ongoing Green OIZ advisory services project (IFC-600641), and it

recommends a set of institutional and regulatory reforms. This component will support development and implementation of required policy/regulatory reforms by leveraging OIZ Implementation Regulation numbered 27402 and dated 02.02.2019. This will ensure systematic implementation of the Green OIZ framework nationwide in a private sector friendly manner including operationalizing the Green OIZ certification mechanism that would set forth the prerequisites and measurable green performance indicators for the use by OIZ practitioners to be deemed as “Green Flag” OIZ. The Green OIZ certification standard will be unique to Turkey and build on the international eco-industrial park framework that the WBG published in December 2017. The activities would include also developing a governance mechanism for certification of Green OIZ performance and mapping out the roles and responsibilities of the governing and administrative bodies of OIZs to ensure green performance measures are encouraged, managed and monitored in a systematic manner.

- Feasibility studies for non-traditional green and competitiveness infrastructure investments, including industrial symbiosis. The government, OIZs, and tenant firms often underestimate the potential returns and spillovers from green infrastructure, industrial symbiosis and resource efficiency & cleaner production projects resulting in the need for additional support in order for those to take place. The proposed activities will include conducting inventory of resource utilization, energy consumption, pollution sources and levels, waste generation assessment, etc., which will be followed up by subsequent development of tailored technology solutions to implement greener manufacturing interventions.
- Feasibility studies for establishment of new zones (innovation centers) or upgrading/expanding existing zones or innovation centers, in line with emerging government priorities.
- Technical assistance and capacity building for the management and staff for the newly established model factory, skills training center(s), and common standards and testing facilities to ensure that they follow the international good practices and have the relevant internal capacity to manage, operate and maintain these facilities after the completion of the World Bank project.
- Learning from international and domestic experiences. Performing introductory seminars and workshops nationwide to provide familiarity with the concept of green OIZs, model factory and modern innovation centers, and collect feedback from stakeholders to identify the capacity building needs. Showcasing the eco-industrial opportunities identified during the diagnostics conducted and international best practices in order to familiarize the OIZ regional directorates, tenant firms within OIZs, relevant provincial directorates and chambers of industry with such opportunities and increase the level of awareness. Knowledge transfer and learning from international experiences (such as Europe and East Asia, etc.) in the areas of eco-industrial park, model factory, innovation centers, zone-based skills training centers, and common testing facilities will be supported, including analyses, knowledge exchange forums, training workshops, study tours, and dissemination of printed materials. Domestic knowledge sharing between experienced and novice OIZ in Turkey will be also promoted, thus promoting early investments in green and competitive infrastructures and facilities. Such internal knowledge sharing could catalyze demand for new investments.

Sub-component 2.2: Project management and support to the Project Implementation Unit (PIU) This sub-component would support the project implementation unit, which would assist MoIT with technical supervision of the Project activities, including facilitating investment and business performance, supporting infrastructure development, monitoring progress, undertaking audits, and developing evaluation and reporting with an integrated feedback loop.

The objective of the project is to increase the efficiency and environmental sustainability of OIZs in Turkey. The proposed Project would support both infrastructure and the enabling environment for OIZ sustainability, competitiveness, and efficiency. The results chain of the Project is shown below.

Figure 1 Results Chain of the Project

Challenges	Project Components/Sub-components		Outputs	Intermediate Outcomes	Results
<p>Challenge # 1</p> <p>High environmental impacts of industrial production, low efficiency and high resource-intensity (raw material, energy, water, etc.) of infrastructure and enterprises in OIZs and lack of new investments targeted at "greening"</p>	<p>Component 1:</p> <p>Supporting infrastructure and the enabling environment for OIZ sustainability, competitiveness, and efficiency.</p>	<p><i>Sub-component 1.1. Investments in basic OIZ infrastructure, leveraging "green" solutions[SV1] to the extent possible</i></p>	<ul style="list-style-type: none"> • Investments in OIZ green infrastructure • Improved regulations and standards of "Green OIZ" framework • Established innovation centers 	<ul style="list-style-type: none"> • Green OIZs Certifications • Firms benefiting from OIZ green infrastructure investments • Renewable energy generated due to OIZ green infrastructure investments • Energy and water savings from OIZ green infrastructure investments • Reduction in CO2 emissions due to supported investments • Implementation of industrial symbiosis projects 	<ul style="list-style-type: none"> • Increased sustainability and better financial performance of OIZs • More productive, competitive and innovative firms in OIZs • Increased Industrial activity and employment in OIZs • Reduced greenhouse gas emissions and use of resources
		<p><i>Sub-component 1.2. Investments in green infrastructure in OIZ</i></p>			
		<p><i>Sub-component 1.3. Investments in OIZ innovation centers</i></p>			
<p>Challenge # 2</p> <p>Low capacity and productivity, as well as inefficient management of OIZs</p>	<p>Component 2.</p> <p>Technical assistance and capacity building</p>	<p><i>Sub-component 2.1. Technical assistance and capacity building for MoIT and OIZs</i></p>	<ul style="list-style-type: none"> • Technical assistance and capacity building to the MoIT (Directorate General of OIZs) and OIZs on preparing, assessing, and evaluating investment proposals • Adequately staffed Project Implementation Unit is established and maintained at MoIT 	<ul style="list-style-type: none"> • More effective and sustainable government management of OIZs and support of industrial transformation • MoIT, PIU, OIZs capacity improvement in technical, E&S, investment planning, management, procurement, etc. • Effective citizen engagement processes • Increase in demand for gender-based violence support services in project regions 	<ul style="list-style-type: none"> • Improved capacity of MoIT, OIZs and PIU
		<p><i>Sub-component 2.2. Project management and support to the Project Implementation Unit (PIU)</i></p>			
<p>Challenge # 3</p> <p>Unavailability of investments in OIZs</p>	<p>Long-term commercial financing mobilized (US\$)</p>			<p>OIZs long-term commercial financing</p>	

c. Environmental and Social Risks of the Project

Overall, the Project is expected to have a positive impact on investors of industry sectors as its main target groups are mainly investors in OIZs. The ultimate aim of this Project is to enable companies in the OIZs to produce in a more competitive and efficient way. For this purpose, the qualifications and variety of the

OIZ services provided to companies should be diversified. Another positive impact of this Project is the improvement of the working environment of the employees working in companies that will take place in the OIZs. Also, the innovation center component of the project will enable the increased contribution of the OIZs to resident companies in the fields of digitization, R&D innovation, innovative class/employees and entrepreneurship. Thus, the Project will have positive impact on increasing innovative capacity of the region where the OIZ is located, in both social resources and technical resources wise.

The environmental risks of the Project have been assessed as substantial while social risks have been assessed as moderate given the nature of investments supported by the project as well as contextual risks including the MoIT's first experience as the main implementing agency² in working with the Bank's new Environmental and Social Framework (ESF). The potential environmental and social risks are currently being assessed by the MoIT and relevant documents and plans to address risks, if any will be prepared accordingly.

Although majority of the project activities will be implemented within the boundaries of the OIZs, from the social risk perspective, the Project has prepared a Resettlement Framework (RF) in the unlikely event that there is land acquisition leading to economic or physical displacement, and to allow for OIZs to propose investment projects feasible and high value-added projects even if they necessitated land take or had previously acquired land with legacy issues. RF identifies such potential investments and provides guidance to mitigation land-based impacts.

However, the project will exclude any "high risk" sub-projects that involve large-scale land acquisition with impacts on biodiversity and cultural heritage and which take place in any natural and critical habitats. Real estate purchases and major construction works as well as sub-projects that are 'associated' with other infrastructures and facilities will also be excluded.

The government laws and regulations governing environment and social risk mitigation will be duly applied to the Project in addition to the World Bank Environmental and Social Standards (ESSs). In current OIZ applications, there are legal arrangements to be low the risk of community health and safety (such as Health Protection Strip of OIZs, Environmental Protection Strip, etc.).

The risks that may arise during the construction works to be carried while the project is being implemented will be mitigated according to the guidance in the Environmental and Social Management Framework (ESMF). Impacts on community health and safety are expected to be low to moderate and will be managed by adhering to mitigation measures included in the ESMF, including a Code of Conduct (CoC) for construction workers to address risks of sexual exploitation and abuse and gender-based violence. Occupational Health and Safety (OHS) risks such as injuries and fatalities during construction works are expected to be minor due to limited scale and short duration of construction works to be financed under the Project. The Project does not expect labor influx issues and most of the recipient OIZs will have adequate staff to work on the sub-projects. The required labor laws and Bank procedures under ESS 2 for use of labor for OIZ project activities are described in the Labor Management Procedure (LMP).

If potential construction involves asset losses, access restrictions of lands that are to be used for sub-projects under any encumbrances such as informal users, legacy issues, etc., such social risks will be dealt through by developing appropriate mitigation measures which are already covered in the Resettlement Framework (RF) prepared for the Project.

² In addition, MoIT also has another project namely "Social Entrepreneurship, Empowerment and Cohesion in refugee and host communities in Turkey Project (SEECO)" which will be implemented in line with the ESF. However, the projects (OIZ and SEECO) are being implemented by different departments of the Ministry

MoIT has prepared a draft Environmental and Social Management Framework (ESMF) that describes mitigation measures to manage potential social and environmental risks. The main environmental risks and impacts are expected to be manageable, including noise, dust and waste management that are confined to small works such as simple construction, refurbishment, and retrofitting.

This Stakeholder Engagement Plan (SEP) intends to fulfil the requirements of ESS 10 Stakeholder Engagement and Information Disclosure of the Bank.

d. Objectives and Scope of the Stakeholder Engagement Plan

The objectives of this SEP are to:

- identify all stakeholders who are indirectly or directly affected by and/or interested in the project,
- outline modalities for information dissemination and stakeholder engagement activities, including their purpose, frequency and location during project preparation and implementation,
- ensure early identification of issues that may pose risks to the Project or its stakeholders;
- ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient);
- promote and provide means for effective and inclusive engagement ensuring long-term communication with project-affected parties throughout the project life on issues that could potentially create an impact
- elaborate on the blueprint for a functional grievance redress/beneficiary feedback mechanism and provide project affected parties with accessible and inclusive means to increase issues and grievances and ensure that these grievances are responded and managed in a timely manner;
- ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format. And
- define the roles and responsibilities of different actors to implement and monitor these activities.

The SEP for Turkey Organized Industrial Zones Project is structured as follows:

- **Section 2** outlines the relevant national regulations and the World Bank's Environmental and Social Standards,
- **Section 3** summarizes previous stakeholder engagement activities,
- **Section 4** covers the stakeholder mapping, segmentation and analysis,
- **Section 5** elaborates on a detailed stakeholder engagement program and key methods of engagement,
- **Section 6** focuses on SEP implementation arrangement,
- **Section 7** provides a description of the project's grievance mechanism, and
- **Section 8** explains overall monitoring and reporting process of the SEP.

2. REGULATIONS AND REQUIREMENTS

a. National Regulations

Table 1 summarizes the national legal and regulatory requirements that are relevant for the SEP.

Table 1. Relevant National Legal and Regulatory Requirements

<p><i>Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)</i></p> <p><i>“Citizens and foreigners resident in Turkey, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Turkey examines complaints on the functioning of the administration¹.”</i></p> <p><i>Right to Constitutional Complaint (Constitution, Article 148)</i></p> <p><i>“Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities. In order to make an application, ordinary legal remedies must be exhausted.”¹</i></p> <p><i>“Article 24, Appeal process - The applicant whose request for information was rejected may appeal to the Board within fifteen days starting from the official notification before appealing for judicial review. Appeals should be written. The Board shall render a decision within 30 days.”</i></p> <p><i>Law on the Right to Information (Articles 11)</i></p> <p><i>“Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days.”</i></p> <p><i>The Environmental Impact Assessment Regulation No. 29186 (Article 9)</i></p> <p><i>1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.</i></p> <p><i>a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.</i></p> <p><i>b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.</i></p> <p><i>2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.</i></p> <p><i>3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.</i></p>

4) *The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.*

Participatory Planning Approach (Public Financial Management and Control Law No. 5018)

Strategic planning and performance-based budgeting

Article 9- Public administrations; They prepare a strategic plan with participatory methods in order to create their future missions and visions within the framework of development plans, programs, relevant legislation and the basic principles they adopt, to determine strategic goals and measurable targets, to measure their performance in line with the predetermined indicators, and to monitor and evaluate this process.

Principles of Participation Guide

Strategy and Budget Department of the Presidency prepares and shares manuals on guidelines for the strategic planning process that public administrations have to implement. One of these guides is about the principles of participation. The principles of participation document are a best practice guide for those who design, implement and manage participatory work. The Ministry of Industry and Technology acts under the guidance of these guides in large-scale projects and works that require corporate strategic planning and participation.

Strategic Plan of the Ministry of Industry and Technology

MoIT carried out a participatory process in which the opinions of internal stakeholders and external stakeholders were received within the scope of the 2019-2023 Strategic Plan preparation activities. In order to measure the perceptions and get suggestions on forthcoming industry and technology strategies and programs of Turkey, a comprehensive external stakeholder questionnaire was conducted to of external stakeholders including those working in public institutions and organizations, non-governmental organizations, public institutions, and higher education institutions.

b. World Bank Environmental and Social Standard on Stakeholder Engagement

The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS)10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, the requirements of ESS10 are:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

This standard requires that the Borrower prepares a Stakeholder Engagement Plan (SEP) that is proportionate to the nature and scale of the project and its potential risks and impacts, disclose it as early as possible before project appraisal, and seeks the views of stakeholders on the SEP, including on the identification of stakeholders and proposals for future engagement. An updated SEP needs to be disclosed by the Borrower subsequent to any significant changes to the original version (World Bank, 2017: 99). In addition, the Borrower should also develop and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 100)³.

³ Details for the WB Environmental and Social Standards are available at: www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards and <http://projects-beta.vsemirnyjbank.org/ru/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

a. Key Stakeholder Meetings and Consultations

Preparatory work for SEP was planned and carried out by MoIT. The stakeholders of the project and their key roles were determined as a result of consultations by the project team of the MoIT.

To date stakeholder engagement efforts have included meetings with key stakeholders, including relevant ministries and other government agencies, representatives of Chambers of Industry and/or Commerce, Organized Industrial Zones Supreme Organization (OIZSO), OIZS, development agencies and other development partners.

Table 2 summarizes key aspects and inputs from these stakeholder engagement efforts.

Table 2. Summary of Meetings with Key Stakeholders

Location	Date	Participants	Key Points of Discussion
Government Agencies			
Ankara	31/06/2019-31/12/2019	Ministry of Industry and Technology (MoIT)	<ul style="list-style-type: none"> Developing the project design, timeline and critical milestones Understanding the Ministry's strategies and priorities for the project Discussion on the Project implementation arrangements
Ankara		Green OIZ coordination council meetings: <i>Ministry of Energy and Natural Resources (MoENR)</i>	<ul style="list-style-type: none"> Scope and constraints of the energy projects regarding the Green OIZ component of the project. Suggestions regarding the Green OIZs component implementation
Ankara	18.02.2020	Green OIZ coordination council meetings: <i>Ministry of Environment and Urbanization (MoEU).</i>	<ul style="list-style-type: none"> Information sharing regarding the project scope Suggestions on construction activities of the project
Ankara	18.02.2020	Strategy and Budget Office of Presidency (SBO)	<ul style="list-style-type: none"> Discussion on the World Bank's support in technical assistance and projects Discussion on the Project implementation arrangements
Ankara	04.07.2019	Ministry of Treasury and Finance (MoTF)	<ul style="list-style-type: none"> Discussion on the World Bank's support in technical assistance and projects Discussion on the Project implementation arrangements
Ankara		Green OIZ coordination council meetings:	<ul style="list-style-type: none"> Information sharing regarding the project scope Suggestions on Green OIZs and Innovation

		<i>Small and Medium Industry Development Organization (KOSGEB)</i>	Center components of the project
Ankara	Green OIZ Coordination Council meetings	Scientific and Technological Research Council of Turkey (TÜBİTAK)	<ul style="list-style-type: none"> Information sharing regarding the project scope Suggestions on Green OIZs and Innovation Center components of the project
Ankara	04.02.2020 10-15.02.2020 18.02.2020	Ankara Development Agency	<ul style="list-style-type: none"> Information sharing regarding the project scope Learning experiences and knowledge about project implementation in general Discussions on project proposal documents preparation process
Development Partners			
Ankara	04.07. 2019	UNDP	<ul style="list-style-type: none"> Learning experiences and knowledge sharing on projects of UNDP on the ground
Chambers/Representative Institutions of Private Sector and OIZs /NGOs			
Provinces where potential beneficiary OIZs are located)	18.02.2020	OIZs	<ul style="list-style-type: none"> Learning experiences and knowledge about project Discussion on the Project implementation arrangements
Ankara	09.07. 2019	OIZSO	<ul style="list-style-type: none"> Learning experiences and knowledge about project Discussion on Project implementation arrangements
Ankara	18.02.2020	The Union of Chambers and Commodity Exchanges of Turkey (TOBB)	<ul style="list-style-type: none"> Information sharing regarding the project scope Suggestions on project implementation process

In addition to the stakeholder engagement activities described above, the World Bank (WB), in partnership with MoIT, has conducted stakeholder consultation meetings, missions and site visits with partners including OIZs, OIZSO, Strategy and Budget Office of Presidency. These pre-meetings were beneficial to form scope of the WB project. Also, meetings in MoIT among different departments of the Ministry were held to consult and agree on project components and implementation procedures to be incorporated in proposal documents. Meetings with MoENR and MoFT were also important to decide application to the WB loan.

After meetings and consultations with stakeholders, MoIT started to prepare the Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Environmental and Social Management Framework (ESMF) and other required documents.

After first drafts of these documents are developed, MoIT held a stakeholder engagement meeting on 18.02.2020 in order to present key aspects of the project proposal, share scope of SEP and other procedures during the project preparation phase. The stakeholder participant list of this meeting is provided in Annex 1.

During the meeting, stakeholders including OIZs, TOBB, OIZSO, SBO and other public authorities were encouraged to comment and provide their suggestions both on the project scope and the proposal documents. Some OIZs shared their concerns on the possibility of an increase in the difficulty of the loan application procedure for themselves if the WB's required procedures would be applied. Also, the OIZs asked for technical assistance to prepare loan application and environment and social capacity building .

Similarly SBO representatives also commented on the difficulties associated with funding the OIZ's Projects by World Bank loan: They stated that MoIT must ensure that there should be no difference in terms of required paper work and bureaucracy between the loan provided by the self-funding of the MoIT and by the WB. As a response to these demands, MoIT ensured these demands would be addressed in the Project through increasing technical capacity and providing technical assistance.

Another concern of especially the representatives of the public institutions was the lack of demand for the WB loan since the access to the loan of MoIT and its procurement procedures are much easier compared to the WB's. However, the representatives of MoIT ensured the stakeholders that there will be sufficient demand for both loans since the demands of OIZ for loans are much greater compared to the budget of the MoIT which is responsible for providing loans for OIZs.

Also, providing OIZs with larger amounts of loans will be possible thanks to the WB loan considering the MoIT usually tends to give smaller amounts of loans due to the lack of budget. With such smaller loans, the demands of OIZs can only be partially met, which can sometimes be less efficient.

In conclusion, the attitude of the stakeholders toward the project and its components were positive during the meetings and visits described above. The SBO endorsed it especially because of the favorable interest rates. Although some stakeholders have certain concerns, they were and will be mitigated by providing technical support.

This interim disclosure meeting was helpful for MoIT to take forward its efforts to complete application procedures smoothly with suggestions and approval of its stakeholders. MoIT will also organize and execute several engagement meetings upon agreement on this SEP document in order to disclose the document.

The project does not have specific beneficiary groups and affected parties as such to engage and get the feedback at this stage. Since the OIZs are located on demarcated areas in line with the zoning plans, and they are designated areas which are selected in remote areas with clear user rights by OIZs (already acquired land or government lands) and do not have private land owners within the OIZ zones. Thus compared to other Bank projects the project is less likely to generate impacts on PAPs or local communities. Secondly, the participating OIZs will prepare subproject level SEPs after identifying subproject/investment activities and may include plans and methods to engage community groups or individuals who may considered as key stakeholders. Stakeholder comments for the ESMF drafted by MoIT will also be taken before project effectiveness and key points of discussions will be updated in this SEP.

The subproject/OIZ level SEPs that to be prepared during the project implementation will include not only the workers and staff of the respective OIZs but also surrounding communities including CSOs and NGOs in the vicinity of the OIZs.

b. Lessons Learned from Previous Projects

The MoIT has no comparable project experience funded by the World Bank, however it has a significant experience in engaging communities and stakeholders as the MoIT has managed EU-funded projects. It also has provided loans for the establishment, construction and operation of OIZs, of which funding is allocated from the Ministry budget. MoIT has experience in working in a multi-stakeholder environment considering it is the Ministry responsible for the OIZs. The OIZs in Turkey are established, managed and inspected by multiple local stakeholders by their nature. For instance, they gain legal status upon the approval by the Ministry and registration of the establishment protocol by the Governor and signed by the representatives of at least one of the chambers of industry, chambers of trade and industry, or chambers of trade depending on their presence in the place where the OIZ is projected to be established; also, if requested, additional signatories can include the special provincial administration or the municipality of the province, administrative district or sub-district in which the OIZ shall be located, the metropolitan municipality in Metropolises and the relevant professional organizations and associations in specialized OIZs.

The project incorporates the lessons by MoIT's previous experience on stakeholder engagement, in parallel with implementation experience of its loans for OIZs as well as other development projects in Turkey:

The key lessons are as follows:

- The relevant stakeholders from public, private and non-governmental sectors must be identified based on their responsibilities on the project.
- The opinions of the stakeholders must be incorporated into the preparation phase of the project proposals to prevent any setback during the implementation phase.
- The stakeholders must be informed on developments regarding the project periodically both during the preparation and implementation phase.
- Each stakeholder must be asked to identify a contact person to ensure the continuity in communication. The contact person will be expected to participate in relevant meetings and project activities while the MoIT will be responsible to inform the contact person of any stakeholder on all developments.
- During the implementation phase, the feedback from stakeholders must be taken into consideration while preparing key documents, outputs, and taking important decisions.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

A key element of any SEP is effective identification of key stakeholders. Stakeholders are defined as individuals or groups who can affect, are affected by, or have a legitimate interest in the Project.

Project-Affected Parties

For the purpose of the SEP, the term “Project-Affected Parties” (PAPs) includes “those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities” (World Bank, 2018b). They are the individuals or households most likely to observe changes from environmental and social impacts of the project.

Other Interested Parties

The term “Other interested parties” (OIPs) refers to “individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups” (World Bank, 2018b).

Disadvantaged/Vulnerable Individuals or Groups

The sub-project selection will be carried out through applications of the interested OIZs to the MoIT. So, the locations of the sub-projects have not been determined yet and they may be implemented in any provinces of Turkey. Therefore, at this stage, it is not possible to identify all potential vulnerable/disadvantaged individual/groups.

However, the sub-projects to be implemented within the scope of the Project will be located within OIZ areas, where land acquisition processes are already completed. There is a potential that some sub-projects (such as construction of wastewater plant, sludge drying and renewable energy projects or facilities such as access roads or Energy Transmission Lines) may necessitate acquisition of additional land. Although no physical displacement is envisaged under the project, the Project might have impact/influence on single women-headed households, households with disabled members, households under the poverty line as determined by households receiving social assistance. In order to be able to manage this potential impact on vulnerable/disadvantaged groups that may arise due to land acquisition, the MoIT has prepared a Resettlement Framework which will serve as a guideline in preparation of sub-project specific Resettlement Plans that will mitigate the potential impacts of the Project on landowners including the vulnerable groups.

As mentioned previously, identification of the vulnerable/disadvantaged individual/group has been undertaken during project preparation. The SEP is a living document which will be updated in accordance with any clarification on the sub-projects and therefore this section of the SEP will be updated accordingly.

However, as per workers that will be employed by the contractors or sub-contractors for infrastructure works that are included in OIZs’ loan application, sub-projects to be financed within the scope of this Project, might be able employ or otherwise assist/benefit disadvantaged/vulnerable groups.

Stakeholder Mapping and Analysis

Stakeholder Mapping table below summarizes categorized project stakeholders with details regarding to their involvement, interest in or influence on the Project.

Table. 3 Stakeholder Mapping

Stakeholder Groups	Details	Significance of Influence	Significance of Interest		
Project Affected Parties (PAP)	OIZs	An OIZ is defined as the goods and services production zones, which are formed by allocating the land parcels, the borders of which are approved, for the industry in a planned manner. OIZs are main affected parties of this project. Upon approval of the Project by WB, OIZs will be able to apply MoIT for loans to realize infrastructural and innovative objectives of their production environments in line with goal of this Project. .	High	High	
	Land Owners in OIZs (firms)	Land owners are firms which are real persons or legal entities to whom parcels are allocated or sold for the establishment of an enterprise and those who make or undertake to make production on the parcels in OIZs owned by them and operate in line with the purpose of OIZs Law. <i>They will be final beneficiaries of the Project. The transformation that will be realized through loans to be used by OIZs will supply renewed technical infrastructure for landowners to benefit from.</i>	Medium	High	
	Other Interested Parties (OIP)	MoENR		Medium	High
		MoEU		Medium	High
MoTF			Medium	High	
Government Authorities		Strategy and Budget Office of Presidency, KOSGEB <i>are consulted organizations for project preparation and implementation phases.</i>	High Medium	High High	
	TÜBİTAK		Medium	High	

	Ankara Development Agency <i>supports MoIT in project preparation.</i>	Medium	Medium
	Municipal authorities <i>are impacted indirectly due to OIZs that will apply to loans.</i>	Medium	Medium
	Private Investors,		
Private Sector <i>(includes contractors, sub-contractors)</i>	Environmental technology and service providers		
	Suppliers of “green infrastructure”, goods and services <i>will take place as suppliers in project implementation phase.</i>	Medium	Medium
Project Implementing Partner	MoIT is the project implementing entity .	High	High
International Development Partners	WB is credit supplier.	High	High
	OIZSO (Organized Industrial Zones Supreme Organization), <i>which is formed in order to enable the OIZs to help each other and solve their common problems and</i>		
NGOs	The Union of Chambers and Commodity Exchanges of Turkey (TOBB) <i>is the highest legal entity in Turkey representing the private sector which was established according to Law No. 5174</i>	Medium	High
Local communities	Communities residing near OIZs will be affected positively from outcomes of the OIZs’ changed infrastructure and technical capacity due to loans supplied by the Project.	Low	High
Media	The media will have a key role in disseminating information on the efforts and results of the project	Low	Medium
Disadvantaged/Vulnerable groups	Workers included in disadvantaged/vulnerable groups Workers with disability, single-parent households, internally displaced persons, socially vulnerable households <i>may be employed by contractors, subcontractors within sub-projects of OIZs that will benefit from this Project.</i>	Low	Low

The Stakeholder Analysis table below provides an analysis of stakeholders that have medium or high significance. However, those with low significance stated in the Table 3 will be also included in the stakeholder activities, as required.

Table 4. Stakeholder Analysis

Stakeholder	Concerns & Issues	Expectations from Project
OIZs	<ul style="list-style-type: none"> • Lack of infrastructure • Need to increase competitiveness of firms in OIZs. • Limited working space in OIZs. • Lack of innovation facilities in OIZs. • Need to strengthen regulatory environment to mainstream green manufacturing 	<ul style="list-style-type: none"> • Strengthened OIZ infrastructure and enabling the infrastructure to become greener, more efficient and more innovative • Provision of loan to the OIZs for basic and green infrastructure • Establishment of Innovation Centers in the OIZs Increased quality of the OIZ management
Land Owners in OIZs (firms)	<ul style="list-style-type: none"> • Lack of infrastructure • Lack of accessible innovation environment • Lack of support to firms in terms of increasing their competitiveness by the OIZs • Lack of services from OIZs. 	<ul style="list-style-type: none"> • Strengthened OIZ infrastructures which are greener and more efficient through the Project. • Increased domestic value-added, strengthened technological and innovative capacity of local companies, and strengthened skills of domestic workers • Provision of loan to the OIZs for basic and green infrastructure Diversified and improved services of the OIZs
Ministry of Industry & Technology	<ul style="list-style-type: none"> • Lack of infrastructure in OIZs. • Lack of competitiveness of firms. Lack of working environment in OIZ 	<ul style="list-style-type: none"> • Strengthened OIZ infrastructure and enabling the infrastructure to become greener, more efficient • Provision of loan to the OIZs for basic and green infrastructure Establishment of Innovation Centers in the OIZs Increased quality of the OIZ
Strategy and Budget Office of Presidency	<ul style="list-style-type: none"> • Need to increase budget for development of OIZs. 	<ul style="list-style-type: none"> • Provision of support about raising new funds for providing credits for OIZs.
Municipal authorities	<ul style="list-style-type: none"> • Need to establish OIZ for development of industrial ecosystem in developing regions. • Need to increase the level of technology and efficiency of existing OIZs for improving the social and economic development of the region. • Need to increase decent employment opportunities in the region. • Need to increase social facilities such as childcare institutions. 	<ul style="list-style-type: none"> • Strengthened OIZ infrastructure and enabling the infrastructure to become greener, more efficient and more innovative • Establishment of Innovation Centers in the OIZs Provision of support for generation of job opportunities in the OIZs and their vicinity Improved social infrastructure (i.e. childcare facilities to promote female employment) for OIZs' employees.
KOSGEB	<ul style="list-style-type: none"> • Lack of innovative capacity and lack of green production approach of firms in OIZs. 	<ul style="list-style-type: none"> • Establishment of Innovation Centers in the OIZs
TUBİTAK	<ul style="list-style-type: none"> • Lack of innovative capacity and lack of green production approach of firms in OIZs. 	<ul style="list-style-type: none"> • Establishment of Innovation Centers in the OIZs
Universities and	<ul style="list-style-type: none"> • Facing challenges to improve their quality 	<ul style="list-style-type: none"> • Establishment of links between the

research institutes	and relevance, such as limited collaboration with industry and research institutes, and limited knowledge and experience in technology commercialization and entrepreneurship.	universities and research institutes and OIZ participant firms which will enable collaboration for introducing and commercialization of innovative ideas.
Private investors, potential OIZ participants	<ul style="list-style-type: none"> • Lack of basic infrastructure especially in less developed OIZs/regions. • Absence of “green infrastructure” which supports energy efficient production • Lack of accessible centers on innovative capacity building. 	<ul style="list-style-type: none"> • Promotion of an attractive investment environment • Increased domestic value-added, • Strengthened technological and innovative capacity of the local companies, and skills of domestic workers • Provision of finance to the basic OIZ infrastructure (such as roads, power, water/gas supply, communications networks, and administrative buildings)
Suppliers of “green infrastructure”, goods and services	<ul style="list-style-type: none"> • Involvement of the suppliers in the procurement process for the basic infrastructure and green OIZ components of the project 	<ul style="list-style-type: none"> • Involvement in the procurement process of the Project regarding Green infrastructure, goods and services • Increased demand for “green technologies”, goods and services (for instance improved energy and water efficiency, renewable energy investments, advanced water and wastewater treatment facilities, LED lighting)
Local communities	<ul style="list-style-type: none"> • Need to increase decent employment opportunities in the region. • Need to increase social facilities such as childcare institutions. 	<ul style="list-style-type: none"> • Generation of employment opportunities within the OIZs and their vicinity • Improvement of social infrastructure (i.e. childcare facilities to promote female employment)
Media	<ul style="list-style-type: none"> • Lack of information about the project • Need to disseminate information about the project’s progress and successes 	<ul style="list-style-type: none"> • Achievement of the Project targets and objectives

As is seen from Table 4, the stakeholders’ expectations in the Project differs according to their influence on or interest in the project. OIZs, which are the most affected party as they will be the beneficiaries of the loans supplied by the WB loan acquired by the Project, have concerns about difficulty of the loan application procedures due to WB requirements. These concerns will be addressed by MoIT by adding more technical capacity building activities to the Project execution phase as well as designing the loan application procedure in the sense that there should be no difference in terms of required paper work and bureaucracy between the loans provided by the self-funding of the MoIT and by the WB. One of the other concerns of the OIZs is not being able to build enhanced green infrastructures or establish innovation center investments due to lack of technical capacity. In order to address these concerns and mitigate related investment risks, the Project will include activities for strengthening organizational and technical capacity of the OIZs. Also, the OIZs will be encouraged to collaborate with the universities and research institutes to overcome technical difficulties during the loan application process as well as implementing related infrastructural changes.

In order to achieve the Project objectives and to make use of acquired WB loan, MoIT will execute

necessary informative actions to introduce new loan volume for OIZs with the help of other stakeholders. OIZs that have capacity or can increase their capability to complete their investments will be selected for distribution of the WB loan in order to mitigate the risk of incomplete investments. Loan applicants will receive technical assistance throughout their application and project implementation process.

The Project aims to attract new innovative firms and/or firms care for energy and resource efficiency to the OIZs and these firms may benefit from the loans. Thus, impact of the project is expected to reach to wider audiences through provision of proper and continuous technical assistance and capacity building activities during the life of the Project.

5. STAKEHOLDER ENGAGEMENT PROGRAM

a. Overview of Stakeholder Engagement Methods

As an attempt to increase the ownership of the project by the stakeholders, a number of participatory engagement methods were incorporated into the preparation phase of this project. In this way, all potential risks and setbacks associated with the participation and engagement of the stakeholders were identified and mitigation measures were designed accordingly. The first and most useful tool for this was the official meetings where all relevant stakeholders gathered together and conveyed their opinions, which was reflected in the project documents including the Stakeholder Engagement Plan. The second participatory engagement tool adopted in this project is survey studies with the OIZs. Although some OIZs were invited to the stakeholder meetings, it was not possible to ensure the participation of the entire OIZs in Turkey. In order to compensate for the lack of representation of some OIZs in the official meetings, the survey studies were utilized to incorporate their needs and opinions into the project design. Besides, Başkent OIZ and Eskişehir OIZ were visited together with the WB team in order to analyze current status and infrastructural needs that could be incorporated to project proposal. The official meetings, phone calls and interviews held during the site visits enabled beneficiary dialogues with the OIZs.

In order to sustain ownership of the project stakeholders' during project implementation, and to increase social impact of the project, some stakeholder engagement methods to be used in the implementation phase are explained below. As the Covid-19 pandemic has coincided with the preparation studies of this SEP document, additional stakeholder engagement methods and security measures are planned as well.

Due to the government's recommendation and guidance on social distancing and self-isolation regarding the current COVID-19 pandemic circumstances and guidance of the government, it will not be advisable and possible to carry out face-to-face meetings on a large scale. If this situation will not improve during the time of execution of stakeholder meetings, MoIT will prepare presentations about the project and share them with the stakeholders through online meetings. During the online meetings, the participants will be able to share their opinions and raise their ask questions. Following the meetings, the presentations and minutes of the meetings will be shared with the stakeholders and they will receive feedbacks for their suggestions and questions via e-mail.

The internal meetings of the MoIT will be organized with the smallest group of participants possible. All necessary precautions regarding Covid-19 will be taken as advised by the government and health authorities for these meetings including social distancing and use of face masks.

After the COVID-19 situation improves in Turkey and government eases social distancing guidelines, MoIT will start to organize face-to-face meetings with the stakeholders.

- **Official meetings:** The official meetings will be convened at two levels: (i) among the representatives of MoIT, and (ii) with relevant stakeholders. Firstly, the representatives of different units of the MoIT will meet monthly during both the preparation and implementation phase of the Project in order to keep each expert assigned to this Project informed about every aspects/milestones of the project. Also, the Project Implementation Unit will meet weekly to ensure smooth implementation. Secondly, official meetings were/will be conveyed with various stakeholders both during preparation and implementation phase of the Project. A large variety of the stakeholders including representatives of government authorities, municipal authorities, OIZs' and Organized Industrial Zones Supreme Organizations, Chambers of Commerce/Industry and international organizations. Most of these meetings will be executed through digital platforms in compliance with COVID-19 prevention measures recommended by the government.

- **Opening and Closing Meetings:** Both at the beginning and end of the project lifecycle, multi-stakeholder meetings will be organized in order to announce and disseminate project activities and outcomes. These meetings will be executed in digital platforms if health risk due to the COVID-19 pandemic still continues in the time of the meetings.
- **Disclosure Meetings:** Disclosure meetings will be convened with stakeholders including MoIT, OIZs, OIZSO and government authorities such as MoENR, MoUE, chamber of industry and trade , KOSGEB, TÜBİTAK and DAs. In these meetings project documents including the SEP, ESMF, LMP and other relevant implementation documents will be disclosed. Most of these meetings will be executed in digital platforms in compliance with COVID-19 prevention measures recommended by the government. Feedback regarding the disclosed documents will be collected through official correspondences, online feedback forms, e-mails to support the effectiveness of the digital meetings.
- **Digital Communication Tools:** The website and social media accounts of the MoIT will be used to inform stakeholders about the important developments of the Project. The press releases will also be shared with the press. These tools will be effectively used in compliance with the COVID-19 prevention measures in order to lessen the need of face to face meetings.
- **Grievance Mechanism:** Per the World Bank’s ESS10 requirement, a proper grievance mechanism (GM) will be established and operated for the Project. This is explained in detail in Section 7 of this document. For this mechanism to function in a proper and timely manner, a GM focal point who will oversee the entire process will be assigned as a part of the project team of the MoIT. S/he will also be responsible for reporting the grievance redress process of the project for monitoring purposes. This person will also be responsible to coordinate the grievance mechanism to ensure its smooth functioning within the scope of the project. A Communication and Stakeholder Specialist will be assigned for this project in the MoIT to coordinate SEP activities and the inquiries regarding the loan projects. S/he will be the focal point for communication in the Project. The specialist will also be responsible to suggest and execute proper engagement methods in line with the improvements in COVID-19 pandemic period.

b. Overview of Stakeholder Engagement Program

The table 5 below presents roles and responsibilities of key actors in stakeholder engagement to be conducted under the project. Detailed methods of consultations to be conducted are provided in Section V below.

Table 5. Roles and Responsibilities for the Stakeholder Engagement Program

Stakeholder	Project Phase	Communication Channels and Materials	Purpose	Venue	Frequency	Responsible Party
OIZs	Preparation Implementation Post-Implementation	<ul style="list-style-type: none"> • Official Meetings • Survey studies • Beneficiary Dialogues • Opening and closing meetings • Disclosure meetings • Digital platforms 	<ul style="list-style-type: none"> • Reaching every potential beneficiary • Keeping loan applicants informed about all important deadlines, including OIZs in technical capacity building activities • Receiving feedbacks 	<ul style="list-style-type: none"> • Localities in target OIZs • Digital platforms 	Monthly	MoIT
Land owners in OIZs (firms)	Post implementation	<ul style="list-style-type: none"> • Beneficiary Dialogues • Opening and closing meetings • Digital communication tools 	<ul style="list-style-type: none"> • Keeping stakeholders informed • Providing regular updates 	<ul style="list-style-type: none"> • Localities in target OIZs • Digital platforms 	As needed	OIZs MoIT
MoIT	Planning Preparation Implementation	<ul style="list-style-type: none"> • Official meetings • OIZs visits • Project implementation support activities • Supervision missions to the OIZs • Opening and closing meetings • Disclosure meetings • Digital communication tools 	<ul style="list-style-type: none"> • Providing regular updates • Organizing Capacity building, project implementation procedures 	<ul style="list-style-type: none"> • MoIT Office • Digital Platforms 	<p>Official coordination meetings in MoIT including different units: Periodically</p> <p>Monthly Project team meetings:</p> <p>Visits and supervision missions: As needed</p>	MoIT
Strategy and Budget Office of	Preparation	<ul style="list-style-type: none"> • Official meetings • Opening and closing 	<ul style="list-style-type: none"> • Keeping stakeholders informed 	<ul style="list-style-type: none"> • MoIT Office • Digital 	As needed	MoIT

Presidency Development Agencies	Implementation	<ul style="list-style-type: none"> meetings • Disclosure meetings • Digital communication tools 	<ul style="list-style-type: none"> • Providing regular updates • Collecting feedbacks, etc. 	Platforms		
Building contractors, Private investors, potential OIZ participants Suppliers of “green infrastructure”, goods and services	Implementation	<ul style="list-style-type: none"> • Tender announcements 	<ul style="list-style-type: none"> • Reaching every potential beneficiary • Keeping stakeholders informed • Providing regular updates 	<ul style="list-style-type: none"> • Web sites 	As needed	MoIT
Community level stakeholders (vulnerable groups such as unemployed youth, local media, local NGOs/CSOs, trade unions, local leaders etc	<p>Preparation</p> <p>Implementation</p> <p>Post-Implementation</p>	<ul style="list-style-type: none"> • Public consultations/ town halls meetings • Beneficiary Dialogues • Opening and closing meetings • Digital communication tools 	<ul style="list-style-type: none"> • Keeping stakeholders informed • Providing regular updates 	<ul style="list-style-type: none"> • Information leaflets/broa chers • Digital Platforms • Web sites • Localities in target OIZs 	As needed	MoIT OIZ
		•		•		
OIZSO	Preparation, implementation	<ul style="list-style-type: none"> • Official meetings • Opening and closing meetings • Disclosure meeting • Digital communication tools 	<ul style="list-style-type: none"> • Keeping stakeholders informed • Providing regular updates • Collecting feedbacks 	<ul style="list-style-type: none"> • MoIT office • Digital platforms 	As needed	MoIT
Universities and research institutes	Preparation, implementation	<ul style="list-style-type: none"> • Official meetings • Opening and closing meetings 	<ul style="list-style-type: none"> • Keeping stakeholders informed • Providing regular updates 	<ul style="list-style-type: none"> • Offices of OIZ • Universities 	As needed	MoIT, OIZs

		<ul style="list-style-type: none"> • E-mails • Digital communication tools 	Experience sharing especially on capacity building activities			
Media	Implementation	<ul style="list-style-type: none"> • Press releases • Audiovisual stories • Project websites • Social Media Channels developed for the Project • TV/Radio • Project e-mail address • Press conferences • Digital communication tools 	<ul style="list-style-type: none"> • To reach our every potential beneficiary • To keep the stakeholders informed • To provide regular updates about the Project 	<ul style="list-style-type: none"> • Digital platforms 	As needed (Media and other stakeholders will be informed upon milestones of the project)	MoIT

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

a. Elaboration of Stakeholder Engagement Responsibilities

This section outlines the key implementation arrangements for the project's stakeholder engagement.

The MoIT PIU will assume the main responsibility for the coordination, implementation and monitoring and reporting of the SEP's implementation. Table 6 presents the roles and responsibilities of each party for the implementation of the SEP.

Table 6 - Responsibilities of Key Actors/Stakeholders in SEP Implementation

Stakeholder	Responsibilities
MoIT PIU-Project Manager	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities into the overall environmental and social management systems • Developing an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members • Expediting, monitoring, following up PIU team for proper implementation of processes related to grievance mechanism and stakeholder engagement issues • Coordinating with parties for proper implementation of processes related to grievance mechanism and stakeholder engagement issues • Consultation on specific SEP activities
MoIT PIU-Communications and Stakeholder Specialist	<ul style="list-style-type: none"> • Planning and implementation of the SEP • Ensuring that the stakeholder engagement is understood by PIUs and other stakeholders • Leading stakeholder engagement activities with identified stakeholders such as OIZs, OIZSO, loan owners in OIZs, governmental bodies • Organizing/managing Public Participation Meetings and other events related to public disclosure of information • Supporting other PIU staff that may have interaction with stakeholders • Coordinating interface and reporting to/from World Bank in relation to implementation of SEP • Updating the SEP periodically and upon major Project changes • Information sharing with local community members/ Local community representatives • Prepare and implement subproject level SEPs • Consult and engage poor and vulnerable groups such as women, migrants/refugees, unemployed persons in the vicinity of OIzs
MoIT PIU- Environmental and Monitoring Specialist	<ul style="list-style-type: none"> • Monitoring the project progress • Ensuring the successful delivery of all defined documentation • Consolidated reporting on overall SEP activities and the project progress • Implementing social and environmental monitoring • Monitoring and reporting to MoIT PIU and management whether the social and environmental issues stated in related documents are implemented throughout Project lifetime
MoIT PIU-GM Focal Point	<ul style="list-style-type: none"> • Acting as the focal point for the GM in MoIT PIU • Recording and following up grievances related with the Project • Management and coordination on resolution of grievances within the Project

	<ul style="list-style-type: none"> • Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with actions • Coordinating and monitoring GM focal points in OIZs and contractor level • Consolidating Project related grievances from all different GM levels • Informing MoIT PIU and management about the resolution process • Preparing consolidated GM reports of the Project
OIZs Managers of OIZ	<ul style="list-style-type: none"> • Planning and implementation of SEP activities with MoIT for the specific OIZ site • Informing OIZ's SEP related activities to management board of the OIZ • Outreach to PAPs/stakeholders for site specific project issues • Regional and provincial level outreach • Reporting on implementation of SEP activities to MoIT PIU • Executing defined grievance mechanism in the SEP properly and informing MoIT PIU about the overall implementation status
Governmental Bodies (MoENR, MoUE, TUBITAK, KOSGEB, etc.)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of the SEP • Participation to the implementation of some activities in the SEP
Local community representatives and local government agencies	<ul style="list-style-type: none"> • Supporting the Project during the implementation of the stakeholder engagement activities through their available mechanisms and networks (distribution of communication materials, disclosing events/announcements via their websites, organization of meetings, reaching out to relevant stakeholders, etc.)
Chambers/Representative Institutions of Private Sector and OIZs /NGOs (OIZSO and TOBB)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of the SEP. • Participation to the implementation of some activities in the SEP
Project contractors (Building contractors, Private investors, potential OIZ participants Suppliers of “green infrastructure”, goods and services)	<ul style="list-style-type: none"> • Informing MoIT PIU of any issues related to their engagement with stakeholders • Informing local communities of any environmental monitoring (e.g. noise, vibration, water quality monitoring etc.) <p>Developing and implementing a grievance mechanism for their workforce including sub-contractors, prior to the start of works in compliance with PIU's GM requirements</p>
Supervision Consultant	<ul style="list-style-type: none"> • Monitoring the contractors' recording and resolution of grievances, and reporting these to PIU in their monthly progress reports • Contacting with PIU GRM Focal Point for the follow up of the grievances

b. Estimated Budget

The costs associated with the implementation of SEP-related activities (meetings, digital communication activities, etc.) will be covered under the budgets allocated by MoIT and OIZs. But tentative cost of all activities for implementation is estimated to be around USD 105,000. The detail cost estimates to carry out the SEP will be determined after the selection of OIZs for the project support and the SEP and the budget table will be updated accordingly.

Budget categories	Estimated Total Cost (USD)	Remarks
1. Events		

1.a. Organization of project launch and closing meetings and other high-level meetings with large number of participants	10.000	<i>Includes costs such as location hiring, technical services, catering, etc.</i>
2. Communication campaigns		
2.a. Brochures, posters, flyers, leaflets e.g.	5.000	<i>For introduction of the project, and using in important meetings (opening, closing etc.) Also includes GRM communication materials</i>
2.b. Subscription costs to digital meeting platforms, digital communication tools	5.000	<i>Due to COVID-19 precautions most of the stakeholder engagement activities especially if first period of the project will most probably be executed in digital platforms</i>
3. Trainings		
3.a. Provision of training to MoIT PIU on social and environmental issues	10.000	<i>Cost includes training material, trainer, travel to OIZs' sites, etc.</i>
3.b. Provision of training to the PIUs and the contracted staff on GRM	10.000	<i>Cost includes training material, trainer, travel to OIZs' sites, etc.</i>
4. Other expenses		
4.a. Communications consultancy	25.000	<i>Procurement of consultancy services for management of project social media campaigns and organization of big participatory meetings</i>
4.b. Travel costs for MoIT PIU	25.000	<i>Travels costs to some of the OIZs' site to monitor GRM and Stakeholder engagement activities including accommodation</i>
4.c. Project related other costs (project perception surveys, equipment and stationery costs etc.)	10.000	<i>Costs of materials and services that needs to be supplied in smooth management of the project.</i>
5. Contingency Reserve		
5.a. Contingency (%5)	5.000	
Total Stakeholder Budget	105.000	

7. GRIEVANCE MECHANISM

a. Purpose and Scope

The project-based GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project affected stakeholders, and
- Provide channels for the stakeholders to provide feedback and raise concerns.

Having an effective GM in place will also serve the objectives of: reducing conflicts and risks such as external interference, corruption or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

b. GM Overview and Structure

Any grievances that may occur during the project will be addressed at four levels. The GM at the first level will be undertaken by the OIZs. Secondly, contractors will establish their own GM for undertaking grievances for sub-contractors and workers. As the third level the MOIT's GM will be effectively adapted for the Project. Finally, the Presidential Communication Center (CIMER) will constitute the fourth level of the grievance mechanism of this project.

The GM will be accessible to a broad range of Project stakeholders who are likely to be affected directly or indirectly by the project. The GM that will be established in this project can be used to submit complaints, feedback, queries, suggestions or compliments related to the overall management and implementation of the project, as well as issues pertaining to sub-projects that are being financed and supported by the Project, including:

- Mismanagement, misuse of Project loans or corrupt practices,
- Violation of Project policies, guidelines, or procedures, including those related to child labor, health and safety of community/contract workers, sexual exploitation and abuse (SEA) and sexual harassment (SH), and environmental issues
- Grievances that may arise from stakeholders and other interested parties who are dissatisfied with the implementation of the project activities or actual implementation of the Project, and
- General feedback, questions, suggestions, compliments.

GM levels that are incorporated in the project are as follows:

GM at OIZs

Project Implementation Unit (PIUs) in OIZs will be responsible for overall management and supervision of the project including compliance with SEP requirements as well as managing grievances. OIZs have their own grievance mechanisms in place which allows its employees, contractors and stakeholders to raise workplace related concerns and grievances. For this purpose, there are "Request and Complaint Boxes" in various parts in buildings. Additionally, requests, grievances and suggestions can be received by the OIZs through paper-based petitions. Any request, suggestion or grievances can be sent to the OIZs via 'Send Message' and 'Communication' sections of their websites⁴. Furthermore, any personnel may share his/her request, suggestion or grievance to Regional Directorate and the Board of Directors.

⁴ Please visit <https://www.ostim.org.tr/Contact> for OSTIM OIZ, <http://www.samsunosb.org.tr/iletisim/> for Samsun OIZ and

Each of the OIZs that receive loans within the scope of this project will be obliged to assign a focal point responsible for receiving and resolving the grievances. The focal points of the OIZs will be responsible to keep the record of any project-related requests, grievances and suggestions, to convey them to the Regional Directorate and Board of Directors. The Regional Directorate and the Board of Directors will be responsible for timely resolution of grievances within 15 working days. The Focal point of OIZs will monitor and track the GM as well as informing and reporting to the MoIT.

GRM at Contractor Level

PIU will require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of works. The construction contractors will prepare their Labor Management Procedure before the start of civil works, which will also include detailed description of the workers' grievance mechanism.

The workers' grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances and to resolve cases;
- a register sheet to record and track the timely resolution of grievances; and
- a responsible department to receive, record, address and track resolution of grievances.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to PIU in their monthly progress reports. The process will be monitored by the OIZs' focal point and GM Focal Point in MoIT.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances;
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially;
- Anonymous grievances will be treated equally as other grievances, whose origin is known; and
- Management will treat grievances seriously and take timely and appropriate action in response.

The workers will be informed about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed.

Contractors may seek advice and support from the Supervision Consultant (SC) to address grievances submitted in language other than Turkish. Supervision Consultants will monitor the contractors' recording and resolution of grievances, and report these to PIU. The process will be monitored by the OIZs' focal point and GM Focal Point in MoIT.

Handling SEA/SH issues: Although the risk from project activities and in Turkish context is low, grievance mechanism for workers shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway will be established and updated in line with existing procedures of the country. The GM that will be in place for the project workers will also be used for addressing SEA/SH-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GM will also have in place processes to

immediately notify both the MoIT and the World Bank of any SEA/SH complaints, with the consent of the survivor. Thus, the existing GM will also be strengthened with procedures to handle allegations of SEA/SH violations.

GRM at MoIT

MoIT receive formal requests and grievances through the Presidential Communication Center (CIMER). Other than CIMER, MoIT can receive formal grievances either as official petitions or through its online web channels. In accordance with the requirements of the World Bank, an expert will be assigned to function as the GM focal point of the project, who will receive grievances regarding the project through all available GMs. The GM will also allow submission of anonymous grievances through CIMER.

Additionally, requests, grievances and suggestions can be sent to Department of Personnel (for MoIT) either inner writing system or paper-based petitions for project workers, who are staff of MoIT. Requests, grievances and suggestions received in this way are evaluated in every 20 business days. The evaluation results are listed internally on the grievance system and can be accessed by employees through their own intranet. The grievances which are relevant to this Project, received through this system will also be reported to GM focal point.

GRM at National Level

According to **Law on the Right to Information** (*Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days.*"), every requests and grievances regarding the public institutions are received through the Presidential Communication Center (CIMER). Requests via this channel are managed via CIMER responsible contacts in public bodies. MoIT also has CIMER responsible personnel who receive and assign the grievance to the interested parties in MoIT, who also tracks the progress and provides assistance in closing out of a grievance.

The CIMER mechanism of the MoIT will be available to the owners of grievance in this project. If any grievance is received regarding the project or sub-projects, the CIMER responsible of MOIT will convey it to the GRM point of the project.

c. Appeal Mechanism

If the complaint is still not resolved, the complainant may escalate/appeal to a higher level of GM within the project at the central level. If s/he is not satisfied with the decision, then s/he can submit his/her complaint to the appropriate court of law.

d. GM Communication and Process

Information about the project's GM will be publicized as part of the initial feedback consultations in the participating stakeholders. Information about the GM will also be posted online on the MoIT's website in Turkish. While communication language is expected to be Turkish for most of the stakeholders directly affected by the Project, attention should be given to ensuring coordination between different contractors, sub-contractors and workers means to address any language differences. Contractors will take necessary actions for acquiring grievances in different languages.

Details regarding the GM will be updated in Project Operational Manual (POM) and in this SEP, before project effectiveness.

e. Assessment and Closing Procedure

Receiving and registering of grievances within this Project have been detailed in **Section b. “GM Overview and Structure”** with explanations on different GM levels, responsible parties and processes. However, common assessment procedures for all GM levels during this Project are detailed below:

- All grievances are reviewed to be classified whether they are genuine and related to Project activities or not. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact relevant party. Eligible complaints are responded according to Project social and environmental requirements which are identified in ESMF.
- All grievances received through direct phone calls, e-mails and face to-face meetings/communications are taken under registration and GM focal points in different GM levels get contact with the Complainant within ten (10) Business Days following registration in order to explain the Project’s response process to grievance.
- PIUs in MoIT and OIZs and contractors has fifteen (15) business days to investigate and respond the complainants. If the case requires a more complex investigation, updated information is provided to the complainant explaining the actions required to resolve grievance and the likely the timeline, upon consent of MoIT PIU.
- In order to resolve the grievance, any necessary corrective actions shall be applied to satisfy the complainant in compliance with related regulations that the complaint receiver is dependent on.
- All parties shall get an agreement on the corrective actions during solution process.
- PIU aims to solve each complaint within thirty (30) business days after response, and this period is subject to extend upon consent of head of related department in MoIT.
- When the complainants are not satisfied with the decision of dealing party on their complaints, they may apply to court as it is stated in **Section c. Appeal Mechanism**.
- Proof documents of the corrective actions taken (photos from the site in subject or other evidence documents) are collected and a "grievance closure protocol" is signed by PIU or other related complaint handler and the complainant.

f. Monitoring and Reporting on Grievances

Monitoring and reporting on grievances will be held by GM focal points. GM focal points in different GM levels other than MoIT will be responsible to report to PIU’s GM focal point about grievances quarterly.

The PIU’s GRM focal point will be responsible for:

- Collecting and analyzing the qualitative data from grievance redress focal points on 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 GM mechanisms to the the PIU.

The reports to be submitted by the PIU shall include a section related to GM which provides updated information on the following:

- Status of GM implementation

- Qualitative data on number of received grievances (including applications, suggestions, complaints, requests, positive feedback), number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved; and
- Any correction measures taken.

g. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the World Bank Inspection Panel, please visit <http://www.inspectionpanel.org>.

8. MONITORING AND REPORTING

Stakeholder Engagement Plan activities will be monitored periodically and reported in project progress reports biannually. Monitoring and reporting will be executed by a monitoring specialist who will be in close collaboration with the Communications and Stakeholder Specialist and GM focal point in the PIU.

Minutes of the meetings held within the scope of the Stakeholder Engagement Program, participant lists (sex disaggregated), significant comments and feedbacks of projects stakeholders regarding the project, number of grievances and their status (opened, closed, pending, etc.) will be shared as appendices of the project progress reports. Also, the reports on formal requests and grievances on the project and the ways they are addressed will be prepared as part of the grievance redress monitoring process that is described in Section 7. The PIU's GM focal point will be responsible from monitoring and reporting the grievances. GM focal point will report about number and status of the grievances monthly to the monitoring specialist in the PIU.

Throughout the Project life, MoIT will proceed communicating with relevant stakeholders as identified in Stakeholder Engagement Program. Any additional stakeholders identified during the life of the Project will also be added to the stakeholder lists and communication with them will be initiated accordingly. Improvements, upgrades and all environmental and social issues will be communicated via the methods outlined in Section 5 of this SEP. Besides, in case of significant changes or updates regarding the project stakeholders will be informed via appropriate methods.

The SEP will be updated periodically and upon major project changes. Communication method changes due to COVID-19 pandemic restrictions time line will also be reflected to the SEP. SEP updates will provide brief summaries of issues, concerns and questions raised during the previous report period, as well as information on any changes between planned activities and the activities and events actually held.

9. REFERENCES

1. OECD/United Nations/United Nations Industrial Development Organization (2019), “Transforming industries: Unleashing the potential of Industry 4.0 in Colombia”, in Production Transformation Policy Review of Colombia: Unleashing Productivity, OECD Publishing, Paris.

10. ANNEXES

Annex 1. List of Participants of Stakeholder Engagement Meeting on 18.02.2020 (Interim Disclosure Meeting)

YEŞİL OSB PROJESİ PAYDAŞ KATILIM TOPLANTISI KATILIMCI LİSTESİ							18.02.2020
NO	ADI	SOYADI	KURUM	UNVAN	TELEFON	MAIL	İMZA
1	CAHİR	CEPTELİ	RRB	Koşu KİPÇİS	312 218 21 30	cahir.cepeli@rrb.org.tr	
2	Aygül	TATLI	Anadolu OBB	Boşta Md. Yrd.	312 5538181	aygul.tatli@anadolubosb.org.tr	
3	Lokman	ÇETİNER	Anadolu OSB	Çevre Müh.	535 5425881	lokman@anadolubosb.org.tr	
4	Uğur	EMEC	Strateji ve Bütçe Büro Şefi	Uzm. Yrd.	0312 294 6213	ugur.emec@obb.gov.tr	
5	Yasin	ÖCAL	Strateji ve Bütçe Büro Şefi	Uzman	294 6215	yasin.ocal@obb.gov.tr	
6	Haseyin	TAKILARCI	Elmadat OSB	Yapı İşleri Müh.	0532 2977429		
7	Osman	DEMİRER	Ankara STRB 1 Md.	Mühürdüğü	535 6191244	osman.demirer@elmadat.org.tr	
8	Aykut	ÖZKAN	Elmadat Bölge İmarat ve Şehircilik Bürosu	Müdür	0550 468	aykut.ozkan@elmadat.gov.tr	
9	Hoson	GÜLER	Ankara mobilya Loketler İşletmesi	İŞGK Yönetmeni	0588 614 5898	hoson.guler@ankaramobilya.com	
10	Şinber	KARADENİZ	STRB Ankara İl Md. Şefi	Şb. Md.	0552 2419753	sinber.karadeniz@ankaramobilya.com	
11	Yedem	KARCI	OstİM OSB	Şube Md.	0530 9306991	odedem.ancid@ostim.org.tr	



YEŞİL OSB PROJESİ PAYDAŞ KATILIM TOPLANTISI
KATILIMCI LİSTESİ

12	Ali	Aksoy	Baskent OSB	Yapı-İmar Bölümü	0512 610 11 00	ali@baskentosb.org		
13	Delem	AVCI	Baskent OSB	Çevre İsm. Böl.	(90) 610 11 00	delemavci@baskentosb.org		
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15	Sezin	ÇALIKKENT	Z-S.B /YİBİ	Çevre ve Çevrelik Bölümü	08631 416	sezin.cepe@askentosb.org		
16	M. Evren	Yücel	OSB	İmar	08728 83	evren.yucel@askentosb.org		
17	Canıt	Uyg	KOSGEB	Ünvan	0532 951229	canit.uygul@kosgeb.gov.tr		
18	İsmail	Yıldız	OSB	İmar İU.	385 50 30	ismail.yildiz@askentosb.org		
19	Pınar	Yalın Akcağız	OSB	Yeni Erişim Kısm. Koordinatör	530 660 01.53	pinar.yalınakcağız@askentosb.org		
20	Ayhan	ÇAMUR	ANKA (KOSGEB)	Ünvan (KOSGEB)	0512 340 0340	ayhan@ankakosgeb.org		
21	E. Rıza	Urhan	" "	" "	" "	eriza@urhanosb.org		
22	Mehmet	Açıkoguz	Sarı ve Teh. Bütçesi	Sarı ve Teh. Üm.	0312 261 5831			

Annex 2. Grievance Receiving Form

GRIEVANCE FORM			
Name of person receiving grievance:		Date:	
Title:			
INFORMATION ABOUT COMPLAINANT		Ways of Receiving Grievance	
<i>(This section may not be filled if the complainant wishes to remain anonymous)</i>			
Name – Surname		Phone	<input type="checkbox"/>
Phone number		Meetings	<input type="checkbox"/>
Address		Application to Office	<input type="checkbox"/>
District/Neighborhood		Mail/e-mail	<input type="checkbox"/>
Signature (if possible)		Field visit	<input type="checkbox"/>
		Other:	<input type="checkbox"/>
DETAILS OF GRIEVANCE			

Annex 3. Grievance Resolution /Close-Out Form