



# **CLIMATE AND DISASTER RESILIENT CITIES PROJECT**

## **IZMIR PROVINCE, KONAK DISTRICT, EGE NEIGHBOURHOOD BRIDGE CROSSING PROJECT**

### **STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**MARCH 2026**

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## LIST OF ABBREVIATIONS

AoI	Area of Influence
CDRC	Climate and Disaster Resilient Cities
CIMER	Presidency's Communication Centre
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
FI	Financial Intermediary
GBV	Gender Based Violence
GM	Grievance Mechanism
GRS	Grievance Redress Service
IFC	International Finance Corporation
IMM	Izmir Metropolitan Municipality
İLBANK	İller Bankası A.Ş.
KPI	Key Performance Indicators
LMP	Labor Management Plan
LMPrs	Labor Management Procedures
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAP	Project Affected People
PIU	Project Implementation Unit
PMU	Project Management Unit
SCM	Stakeholder Consultation Meeting
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
WB	World Bank
YIMER	Foreigners Communication Centre

## EXECUTIVE SUMMARY

The Türkiye Climate and Disaster Resilient Cities (CDRC) Project (hereinafter the “Project”) was developed with the participation of the Ministry of Environment, Urbanization and Climate Change (MoEUCC), İller Bankası A.Ş. (ILBANK) and the World Bank (WB) to increase the resilience of the Government of the Republic of Türkiye to seismic and climate-related risks and build capacity to manage the impacts of natural disasters in participating municipalities. Five metropolitan municipalities, namely Izmir, Tekirdağ, Kahramanmaraş, Manisa and İstanbul, were selected for the Project. These provinces were selected because they are highly vulnerable to the impacts of natural hazards such as floods, droughts and heat waves, and climate change, and most importantly, they are all located in high seismic risk areas. The Project will continue to focus on developing a comprehensive approach to expanding access to finance for beneficiaries living in risky buildings to afford retrofitting and/or reconstruction, together with investments in infrastructure resilience in these municipalities.

Concordantly, the Izmir Metropolitan Municipality (hereinafter “IMM”) started the construction document preparations for the highway and stream road bridges projects at various locations within the borders of Izmir province in 2021 and the project design works were completed in 2023.

In this regard, "Izmir Province, Konak District, Ege Neighbourhood Bridge Crossing Project" (hereinafter “the sub-project”) will be financed by the Project and will be evaluated under CDRC Component 3 – “Investments in climate and disaster resilient municipal infrastructure” subcomponent. Hereby, ILBANK will be the Financial Intermediary (FI) for this Component, and IMM is the owner of the sub-project and will be responsible for its implementation.

The sub-project area is within Konak district of Izmir province. The general aim of the sub-project is to strengthen the route infrastructure of the existing Mürselpaşa Zafer Payzın Route by increasing the number of lanes to prevent disruption in the traffic flow in case of emergency.

Therewith, the site walkovers to the sub-project areas were made by Envesu Environment Energy Construction and Consultancy Inc. on 14 October 2024. The photographs of the sub-project area are presented in Appendix-A.

Subsequently, Environmental and Social (E&S) risks of sub-project have been identified according to the WB Environmental and Social Standard (ESS)s and CDRC's Environmental and Social Management Framework (ESMF)<sup>1</sup> developed by ILBANK. The E&S risks associated with the sub-project are assessed as "Moderate" and this Environmental Social Management Plan (ESMP) has been prepared. The ESMF of the CDRC provides the

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<sup>1</sup> [https://www.ilbank.gov.tr/storage/uploads/uidb/esmf\\_cdrc\\_ilbank\\_rev\\_final\\_05072024\\_cc\\_1720183156.pdf](https://www.ilbank.gov.tr/storage/uploads/uidb/esmf_cdrc_ilbank_rev_final_05072024_cc_1720183156.pdf)

framework for the development of this ESMP, which is compliant with WB ESS and national legislation. In addition to this, a Stakeholder Engagement Plan (SEP) has been prepared based on CDRC Project SEP<sup>2</sup> as another document for this sub-project in order to identify sub-project stakeholders and create participation methods for the future of the sub-project.

The sub-project's construction works are expected to last approximately 24 months.. The number of personnel to work during the construction phase is approximately 13 people. The defects liability period of the sub-project is the first 12 months after construction. The target year of the sub-project operation is planned as 2055. The sub-project's construction will primarily progress along the existing road route. Therefore, it is an area where excavation work has been previously conducted. However, before starting construction activities, an opinion letter will be received from the Museum Directorate. The opinion letter will be forwarded to ILBANK. To manage activities in terms of cultural heritage, a Chance Find Procedure has been prepared (see Appendix-C). Also, most common OHS risk areas and corresponding general mitigation measures throughout the life of the sub-project are provided in Appendix-D.

The sub-project as bridges and the related access roads project is out of the scope of national Environmental Impact Assessment (EIA) as it is not included in the Annex I and Annex II lists of the Regulation on EIA published in the Official Gazette dated 29.07.2022 and numbered 31907. Nevertheless, the IMM will make the required correspondences to secure the relevant "EIA out of scope" official letters for this sub-project. The related official letter will be submitted to ILBANK.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. In line with the Türkiye Climate and Disaster Resilient Cities (CDRC) Project requirements, environmental and social management of the sub-project is carried out within the framework of ILBANK's Environmental and Social Management System (ESMS). Accordingly, all sub-project-specific environmental and social documents, including the Environmental and Social Management Plan (ESMP) and the Stakeholder Engagement Plan (SEP), have been prepared in compliance with ILBANK ESMS, the World Bank Environmental and Social Standards (ESSs), and applicable national legislation. The ESMS provides a structured approach for identifying, assessing, managing, and monitoring environmental and social risks and impacts, while ensuring transparent stakeholder engagement and effective grievance management throughout the sub-project lifecycle.

When assessed according to the WB Environmental and Social Standards (ESS), ESS5: Land Acquisition, Land Use Restrictions and Involuntary Resettlement standard; it was identified that the lands where the bridge crossing will be constructed are located on the existing roads that are already in use and within the scope of 'public abandonment' according to the Zoning

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<sup>2</sup>[https://www.ilbank.gov.tr/storage/uploads/uidb/clean\\_stakeholder\\_engagement\\_plan\\_sep\\_turkey\\_cdrc\\_rev05072\\_024\\_1721718475.pdf](https://www.ilbank.gov.tr/storage/uploads/uidb/clean_stakeholder_engagement_plan_sep_turkey_cdrc_rev05072_024_1721718475.pdf)

Law under the responsibility of the Municipality. The sub-project area does not overlap with any private land. Therefore, there is no need for expropriation within the scope of the sub-project. In the research on property, IMM informed that there is a parcel under the ownership of State Hydraulic Works (DSI) in the sub-project area and that correspondence has been made with the institution on the related parcel. *The correspondence with DSI regarding the sub-project area will be annexed to this ESMP after it is obtained from IMM.*

As a part of the mitigation measures, sub-management plans and procedures on different subjects will be developed by the contractor prior to the construction works. These sub-management plans will be based on the risks and mitigation measures specified in the Environmental and Social Management Plan (ESMP). These plans will be prepared for construction and operation phases of the sub-project, at least one (1) month before the start of the relevant phase and will be submitted to ILBANK for approval. Employees will be trained on the relevant plans to be developed. A list of management plans for both phases of the sub-project are presented below.

- Occupational Health and Safety (OHS) Management Plan,
- Emergency Preparedness and Response Plan (EPRP),
- Construction Site Traffic Management Plan,
- Contractor's Management and Workforce Management Plan
- Labour Management Plan (LMP) (based on the CDRC's Labour Management Procedures (LMPs))<sup>3</sup>,
- Community Health and Safety Management Plan,
- Waste Management Plan,
- Spill Response Plan,
- Chance Finds Procedure.

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<sup>3</sup> [https://www.ilbank.gov.tr/storage/uploads/uidb/cdrpc\\_labor\\_management\\_procedure\\_imp\\_1685916683.pdf](https://www.ilbank.gov.tr/storage/uploads/uidb/cdrpc_labor_management_procedure_imp_1685916683.pdf)

## 1. INTRODUCTION/PROJECT DESCRIPTION

### 1.1. Objectives of the Sub-Project

The main objective of the sub-project is to strengthen the route infrastructure of the existing Mürselpaşa Route by constructing a bridge crossing and associated access roads to prevent traffic disruptions during emergencies. The sub-project is designed to improve the traffic flow along D300, one of the main arterial roads in Izmir, particularly during peak hours, and to enhance accessibility and mobility for residents of the Ege Neighbourhood and surrounding areas. By establishing a direct and reliable connection between the Ege Neighbourhood and the main road network, the project aims to accommodate increasing transportation demand resulting from ongoing urban transformation and large-scale residential and commercial developments in the region. Objectives of the Subproject.

In addition, the sub-project seeks to reduce travel times, improve pedestrian and vehicular safety through designated crossings, and support emergency response and evacuation needs in the aftermath of disasters. The new infrastructure is expected to contribute to the economic development of the area by facilitating efficient access to industrial and commercial zones while promoting a more inclusive and connected urban transportation system. Through the construction of the K21 Bridge (and culvert) and the K22-K22A Bridge, the sub-project will directly link the transforming Ege Neighbourhood with the broader urban mobility network of Izmir.

### 1.2. Components of the Sub-Project

The sub-project comprises the construction of the Ege Neighbourhood Junction K22 and K22A bridges and associated structural and ancillary works. The main components include excavation and foundation works, construction of reinforced and prestressed concrete bridge elements, cast-in-place piles, and installation of prefabricated beams. The scope also covers waterproofing systems, expansion joints, bearings, and deck components required for bridge superstructure completion.

In addition, the sub-project includes the supply, installation, and transportation of structural steel and prestressing materials, guardrails and safety barriers, drainage elements, façade panels, and protective coatings. Temporary works such as sheet pile shoring, excavation transport, and backfilling are also part of the construction activities. These components collectively aim to ensure structural integrity, traffic safety, and long-term durability of the bridge structures.

### 1.3. Sub-Project Location

Izmir is located next to the Aegean Sea with the provinces of Manisa to the north and Aydın to the south. The total area of Izmir province is 1,209,827 ha.

The sub-project areas are within Konak district of Izmir province. In this context, the sub-project will be a new bridge crossing over the Meles Stream. Since sub-project is on the roads connecting the urban roads and the areas of the relevant access roads, their Area of Influence (Aol) are limited within to 50 m in all directions along the road where the construction areas are located. The sub-project area and the neighbourhoods connected by the bridge crossing are presented in Figure 1-1.

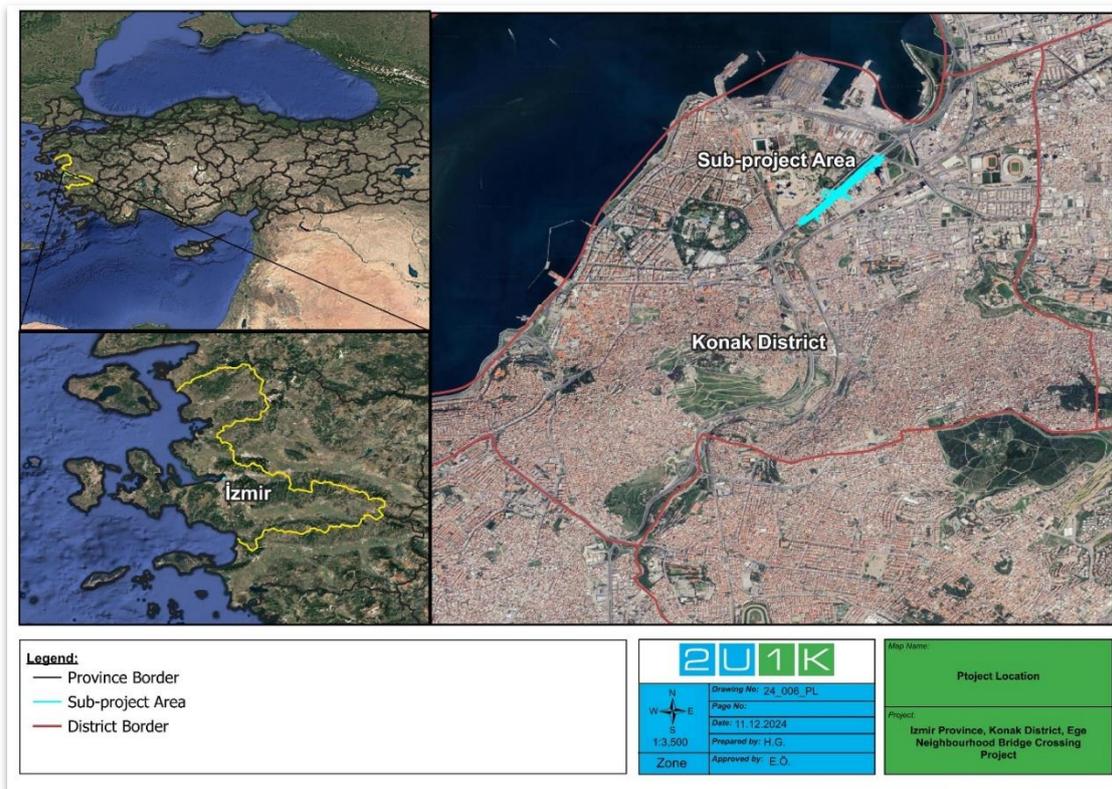


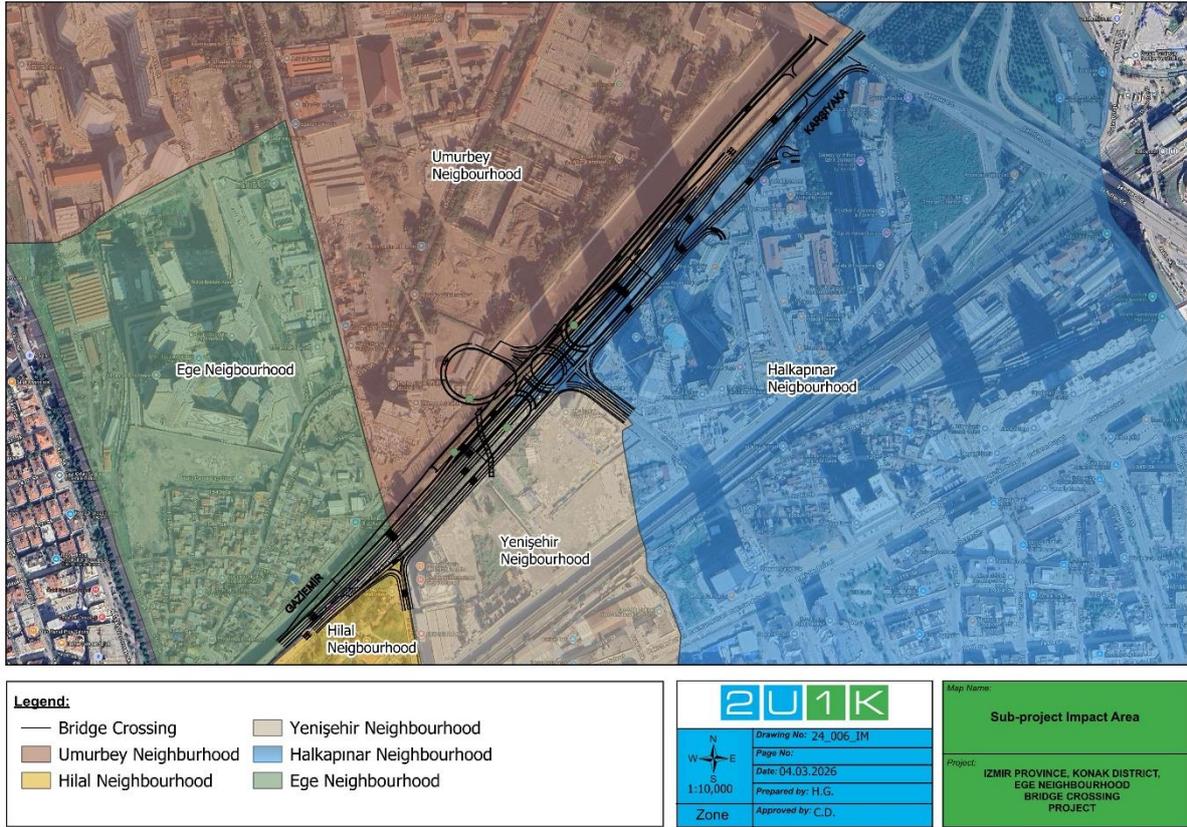
Figure 1-1. Sub-project Location Map

### 1.4. Area of Influence

As the sub-project area include existing bridges on the roads connecting the urban roads and the areas of the relevant access roads, their Area of Influence (Aol)<sup>4</sup> are limited within a 50 m

<sup>4</sup> During the life of the sub-project, the Aol of the sub-project can be expanded by experts who will be in the implementation unit of the sub-project and will participate in monitoring studies.

Izmir Province, Konak District, Ege Neighbourhood Bridge Crossing Project  
 STAKEHOLDER ENGAGEMENT PLAN



**Figure 1-2.** Sub-project Area, Access Roads and Aol Map

## **1. OBJECTIVE/ DESCRIPTION OF SEP**

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

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

## 2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

This section summarises the methodological framework for the stakeholder engagement plan and identification of relevant affected groups, and disadvantaged/vulnerable groups relevant to the sub project.

### 3.1. Methodology

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

- **Openness and life-cycle approach:** Public consultations for the project will be arranged during the Project cycle, carried out openly, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be widely provided to all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the Project cycle. The participation process for the projects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and project implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders’ needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the sub project’s stakeholder communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.
- **Stakeholder identification methodology:** Stakeholder identification will be conducted as an iterative and systematic process throughout the Project life cycle. Relevant stakeholders will be identified based on their proximity to the Project area, the nature and magnitude of potential environmental and social impacts, their level of interest and influence, and their vulnerability to project-related risks. The identification process will be informed by desk-based reviews, field observations, consultations with local authorities (including head of neighbourhood) and feedback received through

engagement activities. Stakeholder categories will be reviewed and updated as the Project progresses to reflect any changes in project scope or impact areas.

Stakeholders for the Project were identified through a combination of desk-based review, field observations, and consultations with local authorities. Initially, publicly available information, planning documents, and institutional records were reviewed to identify relevant governmental bodies, local administrations, and organisations related to the Project area. This was followed by field visits to the Area of Influence to identify nearby residential areas, businesses, and sensitive receptors such as schools and healthcare facilities. Consultations with local authorities, including the head of the neighbourhood, were also conducted to verify the presence of local communities and vulnerable groups within the Project’s vicinity. Based on this process, stakeholders were categorised as project-affected parties and other interested parties according to their proximity to the Project area, potential exposure to environmental and social impacts, and their level of interest in the Project.

### 3.2. Affected parties and other interested parties

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

The term “**project affected parties**” 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.

The term “other interested parties” 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.

**Table 2-1.** Stakeholder Groups

Stakeholder Groups	Stakeholder Type		
	Cause of Impact/interest	Affected Party	Other Interested Party
<b>Municipalities</b>			
• Other Interested Parties	Sub-project development, implementation and employment	√	
<b>Neighbourhood</b>			
• Ege Neighbourhood	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	

Izmir Province, Konak District, Ege Neighbourhood Bridge Crossing Project  
STAKEHOLDER ENGAGEMENT PLAN

Stakeholder Groups	Stakeholder Type		
	Cause of Impact/interest	Affected Party	Other Interested Party
<b>Businesses</b>			
<ul style="list-style-type: none"> <li>Businesses within the sub-project area</li> </ul>	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
<b>Vulnerable/Disadvantaged Individuals or Groups</b>			
<ul style="list-style-type: none"> <li>Children</li> <li>People over 65 years of age</li> <li>People with chronic illnesses or in need of special care</li> <li>Disabled people</li> <li>Refugees/Immigrants</li> </ul>	Potential noise and dust emissions, traffic, access restrictions during construction phase	√	
<b>Administrations of the Sensitive Receptors close to the Aol</b>			
<ul style="list-style-type: none"> <li>Schools</li> <li>Hospitals</li> </ul>	Institutions that need to be sensitive to project impacts due to their proximity to the project area	√	
<b>Media</b>			
<ul style="list-style-type: none"> <li>National and local media</li> </ul>	Informing the public		√
<b>Lender</b>			
<ul style="list-style-type: none"> <li>ILBANK</li> <li>World Bank</li> </ul>	Sub-project Development, Implementation Supervision		√
<b>Government / Authorities</b>			
<ul style="list-style-type: none"> <li>Governorship of Izmir</li> <li>Izmir City Health Authority</li> <li>Directorate General for State Hydraulic Works</li> <li>Izmir Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>Izmir Directorate of Culture and Tourism</li> <li>Regional Board of Protection of Cultural Heritage No. I</li> <li>Regional Board of Protection of Cultural Heritage No. II</li> <li>Izmir Provincial Directorate of National Education</li> <li>TEİAŞ</li> </ul>	Relation of the sub-project with Healthcare, Environmental and Social institutions during construction and operational phases		√
<b>NGO</b>			

Stakeholder Groups	Stakeholder Type		
	Cause of Impact/interest	Affected Party	Other Interested Party
<ul style="list-style-type: none"> <li>NGOs with themes such as environmental protection, public health, and citizenship</li> </ul>	Potential environmental and social risks and impacts identified in the ESMP of this Project and overall E&S performance of the project during implementation.		√

### 3.3. Disadvantaged/ vulnerable individuals or groups

Vulnerable groups refer to persons who, by virtue of, gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status. They can be affected by sub-project impacts differently than others and may be limited in their ability to claim or take advantage of sub-project benefits. Therefore, IMM and the Contractor, will apply provisions for assisting disadvantaged or vulnerable individuals that may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of livelihood assistance and related development benefits. Specifically identified disadvantaged/vulnerable groups and the impacts that these groups are likely to face under the sub-project are given above (and in Table 3-1):

- **Children:**
  - During the construction, children may be exposed to hazards such as construction materials and heavy machinery, posing safety risks.
- **People over 65 years of age:**
  - Construction activities may disrupt daily routines and access to essential services for the elderly, potentially causing inconvenience or stress.
- **People with chronic illnesses or in need of special care:**
  - Construction-related disruptions may affect access to essential services and routines, exacerbating health issues or causing discomfort.
- **Disabled people:**
  - Construction activities may disrupt accessibility routes or facilities, limiting mobility and causing inconvenience.
- **Refugees/Immigrants:**
  - Language barriers and lack of awareness may lead to safety risks and hinder access to necessary information and services.

Based on site observations, local context, and stakeholder consultations, the following vulnerable groups have been identified in the sub-project area. These groups may experience construction-related impacts differently than the general population, particularly in relation to safety risks, access limitations, and temporary disruptions. IMM and the Contractor will

therefore apply specific measures to ensure that engagement, information disclosure, and mitigation actions adequately address the needs of these vulnerable groups.

Table 3-1. Identified Vulnerable Groups and Potential Impacts (Ege Neighbourhood)

Vulnerable Group	Estimated Number (Indicative)	Potential Impacts
<b>Children</b>	30	During construction, children may be exposed to safety hazards such as construction materials, traffic diversions, and heavy machinery, increasing the risk of accidents.
<b>People over 65 years of age</b>	20	Construction activities may disrupt daily routines, pedestrian access, and access to essential services, potentially causing inconvenience, stress, or reduced mobility.
<b>People with chronic illnesses or in need of special care</b>	10	Noise, dust, and temporary access restrictions may affect daily routines and access to healthcare services, potentially exacerbating existing health conditions.
<b>Persons with disabilities</b>	15	Temporary closure or alteration of sidewalks, ramps, and access routes may limit mobility and accessibility, causing inconvenience and reduced independence.
<b>Refugees / Immigrants</b>	25	Language barriers and limited awareness of construction schedules and safety measures may increase safety risks and hinder access to information, grievance mechanisms, and support services.

### 3. STAKEHOLDER ENGAGEMENT PROGRAM

Currently, IMM's communication and consultations with institutions continue, but consultation processes with different stakeholders have not been initiated yet.

#### 4.1. Summary of stakeholder engagement done during project preparation

A site visit was conducted on 21 February 2024 by qualified environmental and social experts to support the baseline assessment. During the visit, the physical setting, environmental receptors, and socio-economic conditions within the Aol were assessed and documented.

These activities aimed to promote transparency, build trust with affected communities, and incorporate feedback into project design, especially considering the sub-project's location within a densely populated urban transformation area with anticipated increases in traffic and development pressure.

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

Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the sub-project. The sub-project has and will continue to use the following methods for interacting with stakeholders:

- **Informal/formal face-to-face or online meetings** with affected communities and other stakeholders – can be the main form of consultation throughout the lifetime of the sub-project. Stakeholders will be informed about these consultation meetings by telephone, brochures, posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties ten (10) days in advance.
- **Focus group meetings** with affected communities and other stakeholders and sensitive receptors (i.e. hospitals, schools, mosques) – can be a form of engagement that will support negotiations throughout the life of the sub-project. It will also provide a suitable environment for stakeholders to express their views.
- **Interpreters (English or other languages)** will be available during the Stakeholder Engagement Meetings, if needed.
- **IMM's website** Through IMM's official website, as well as its phone number and short message service (SMS), the public will be informed of project-related announcements, documents, reports, and other relevant information.– The ESMP and SEP documents prepared for the sub-project will be published in English and Turkish via the IMM's website. Information on the application of the grievance mechanism created by IMM

will be also announced on the website together with the contact details of the GM responsible person. At the same time, all up-to-date information about the sub-project will be made available to the public via the website.

- **Written materials** – Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the sub-project and this Stakeholder Engagement Plan. – Materials will provide information about the sub-project and inform Stakeholders about all communication methods and stakeholder engagement tools created for the sub-project.
- **Grievance mechanism** – will be open to access by the public.
- **Public Information and Disclosure:** Throughout the life of the sub-project, information disclosure and contact information will be promoted through local and national newspapers, websites and the social media accounts of the IMM.

A Stakeholder Consultation Meeting (SCM) will be held before the construction phase (following the draft approval of the ESMP and SEP prepared for the subproject) and also additional stakeholder consultation meetings will be planned if there is;

- a recurring grievance on a specific issue,
- a major change regarding the sub-project,
- intense impact foreseen by the IMM,
- extra intensive work in the construction.

All kinds of notifications or complaints from stakeholders during informal/official face-to-face will be recorded for processing in the mechanism and evaluated within the process of the grievance mechanism. The date and time of the meetings will be arranged in consultation with the stakeholders, and the highest possible participation will be aimed. A shuttle will be arranged for stakeholders to come to the meetings when necessary, or the responsible people will be at the stakeholders' location for face-to-face meetings.

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

**Error! Reference source not found.** presents stakeholders needs within the scope of the sub-project.

**Table 3-1.** Sub-Project Stakeholder Needs

Affected Party	Interested Party	Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
√		Municipality	<ul style="list-style-type: none"> <li>• Metropolitan Municipality of Izmir,</li> </ul>	Management unit	Turkish	Written information, phone, e-mail,	Be aware of sub-project

Affected Party	Interested Party	Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
			<ul style="list-style-type: none"> <li>Municipality of Konak,</li> </ul>			face to face	phases
√		Ege Neighbourhood	<ul style="list-style-type: none"> <li>Neighbourhood' residents</li> </ul>	Target group of the sub-project	Turkish	Written information, phone, face to face, media	Access to a grievance mechanism to submit complaints and questions; timely information about construction schedule and transportation/ traffic changes
√		Vulnerable/ Disadvantaged Groups	<ul style="list-style-type: none"> <li>Children;</li> <li>People who are over 65 years of age;</li> <li>People who have chronic disorder or need special care;</li> <li>Disabled people;</li> <li>Refugees/Immigrants</li> </ul>	Individuals with the potential to be more affected by sub-project activities (especially construction works)	Turkish (or any other language)	Written information, phone, face to face, media	Be aware of sub-project phases, Translator, Transportation
√		Local Businesses	<ul style="list-style-type: none"> <li>Businesses within the sub-project area</li> </ul>	Businesses around the sub-project area	Turkish	Written information, phone, e-mail, face to face, social media,	Be aware of sub-project phases, opportunities for local procurement, local employment
√		Sub-Project Owner	<ul style="list-style-type: none"> <li>MM</li> <li>Contractors and Employees</li> </ul>	Implementation of the project	Turkish	Written information, phone, e-mail, face to face	Internal coordination and clear communication procedures between municipality, contractor and employees
	√	Government / Authorities	<ul style="list-style-type: none"> <li>Governorship of Izmir</li> <li>Izmir City Health Authority</li> <li>Directorate General for State Hydraulic Works</li> <li>Izmir Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>Izmir Directorate of Culture and Tourism</li> </ul>	Representing the state side of the project to be realized on behalf of the public	Turkish	Written information, phone, e-mail, face to face	Formal written communication and regulatory coordination during project implementation

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Affected Party	Interested Party	Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
			<ul style="list-style-type: none"> <li>Regional Board of Protection of Cultural Heritage No. I</li> <li>Regional Board of Protection of Cultural Heritage No. II</li> <li>Izmir Provincial Directorate of National Education</li> <li>TEİAŞ</li> </ul>				
	√	NGO	<ul style="list-style-type: none"> <li>NGOs with themes such as environmental protection, public health, and citizenship</li> </ul>	Creating public opinion on the environmental and social impacts of the project	Turkish	Written information, phone, e-mail, face to face, social media,	Access to project information and opportunities to provide feedback on environmental and social impacts
	√	Media	<ul style="list-style-type: none"> <li>International, national, and local media</li> </ul>	Informing the public about the project	Turkish	Written information, phone, e-mail, face to face, social media,	Access to updated and accurate project information and press communication materials

### 4.3. Stakeholder engagement plan

Table 3-2. Stakeholder Engagement Plan

Sub-Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Pre-Construction	To be informed about the views of critical receptors on the subproject	Meeting with critical receptors	A consultation meeting will be organised prior to the commencement of construction. The most suitable location will be selected and determined according to the demand.	Critical receptor, nearest hospital (Medicana International Hospital), nearest school (Sakarya Primary School)	Consultations to take place before construction begins
Pre-Construction	Public consultations of the draft E&S documents (draft ESMP, SEP etc)	Stakeholder consultation meeting,	Before sub-project construction period with a notification period of 10 days to the public  The most suitable and accessible location considering the needs and profile of the participants.	Communities (Ege Neighbourhood)	Consultations to take place before construction begins
Construction	Traffic safety	Stakeholder meeting, mukhtar meeting	At least one week prior to the commencement of activities, the relevant neighbourhood head will be informed, and special consideration will be given to the needs of vulnerable groups during the notification and engagement process.	Communities (Ege Neighbourhood), Government/Authorities (Izmir Metropolitan Municipality Transportation Department)	Consultation about traffic safety and measures adopted by the sub-project
Construction	Ensuring safety in emergencies	Stakeholder meeting, mukhtar meeting	Whenever necessary during the construction, The most suitable location will be selected and determined according to the demand.	Communities (Ege Neighbourhood), Government/Authorities (Izmir Traffic Police Department, Konak Municipality)	Introducing emergency authorized person, contact information
Construction	Traffic management plan	Brochures, stakeholder meeting, mukhtar meeting	At stakeholder consultation meeting, When necessary, The most suitable location will be selected and determined according to the demand.	Communities (Ege Neighbourhood)	Providing information about traffic management

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Sub-Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Construction	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary, The most suitable location will be selected and determined according to the demand.	Communities(Ege Neighbourhood)	Informing communities about emergency procedures, contact points, and response actions in case of incidents
Operation	Listening to the needs and problems identified by the NGO's, developing joint solution strategies, taking action to improve and consulting to ensure that the sub-project can be more effective	Face to Face Meeting	As needed throughout the operating period. The most suitable location will be selected and determined according to the demand.	Associations / Non-Governmental Organizations	Consultations to take place through sub-project operation phase
Operation	Ensuring safety in emergencies	Stakeholder meeting, headman meeting	Whenever necessary during the operation. The most suitable location will be selected and determined according to the demand.	Communities(Ege Neighbourhood)	Introducing emergency authorized person, contact information
Operation	Emergency response plan	Brochures, stakeholder meeting, headman meeting	At stakeholder consultation meeting, When necessary. The most suitable location will be selected and determined according to the demand.	Communities(Ege Neighbourhood)	Providing information to communities on emergency procedures, contact points, and response actions during operation

#### 4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

Below are the minimum requirements for the content of the Minutes to be prepared after each stakeholder engagement activities and meetings:

- Location of consultation(s)/event,
- Date(s) of consultation(s)/event,
- Details on attendees (as appropriate),
- Meeting/Event Program/Schedule: What is to be presented and by whom,
- The presentation,

- The disclosure details,
- Meeting Minutes (Comments, Questions and Response by Presenters and Photos from the meeting), and
- Agreed actions.

MM will notify the headman's office located in the impact area at least one week in advance of any possible temporary road closures caused by construction works. Similarly, the IMM will inform the affected local people of the future works in Konak Municipal buildings and/or on the notice platforms at least one week in advance.

IMM will be responsible for engagement with stakeholders as an on-going process throughout the life of the sub-project. Stakeholder logs will also be filled out for engagement activities

The minutes and relevant details of the consultations to be held (including SCM) on draft ESMP and draft SEP will be annexed to the final version of this SEP.

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

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

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

## 4. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 5.1. Project Implementation Unit (PIU)

The Project Implementation Unit (PIU) within Izmir Metropolitan Municipality is responsible for implementing the sub-project and managing the Stakeholder Engagement Plan (SEP). A designated Social Expert oversees SEP activities, and a dedicated budget has been allocated for effective stakeholder engagement.

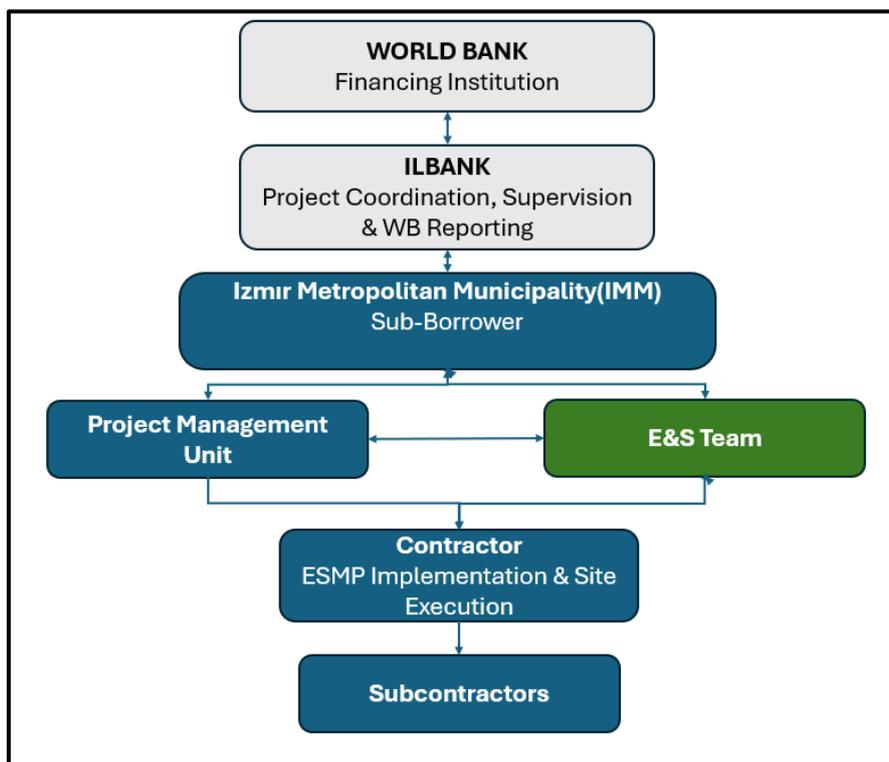


Figure 4-1. Organization Structure of the Subproject

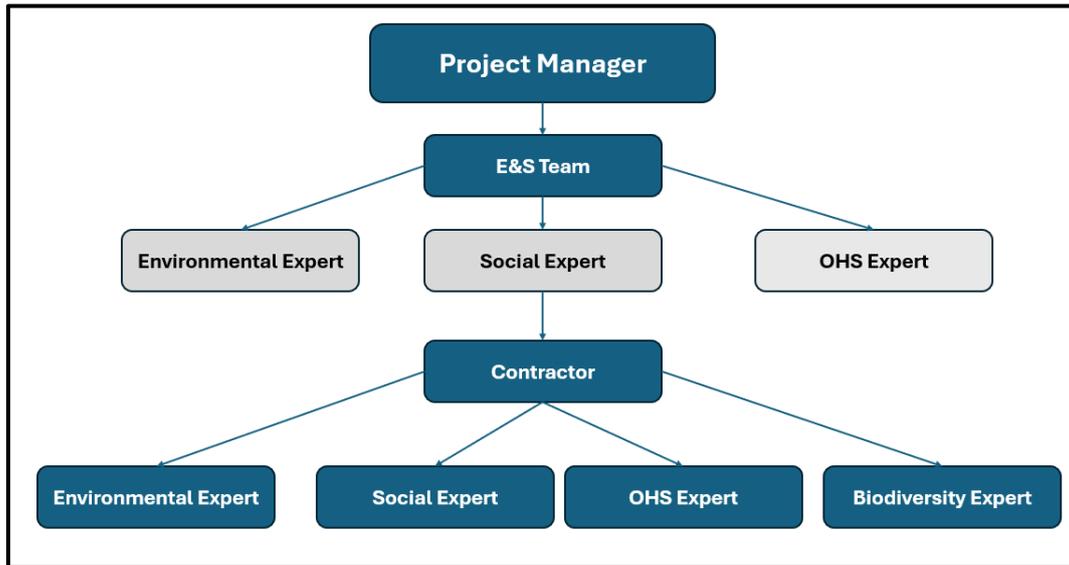


Figure 4-2. Project Implementation Unit and Contractor Structure

## 5.2. Resources

The IMM will be in charge of stakeholder engagement activities. The overall budget that will be required for effective implementation of this SEP is estimated as 3,000 Euro and is included in component Environmental and Social Framework Training of the sub-project.

## 5.3. Management functions and responsibilities

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

The sub-project will be managed by a Project Implementation Unit (PIU) within IMM (see Figure 5-1), under ILBANK Department of Financial Institutions and Investor Relations' guidance. The implementation and controls included in the SEP process will be managed by Social Expert of PIU to be established by the IMM. The PIU will handle procurement, financial management, audit support, and reporting. A defined organizational structure will outline roles and responsibilities for ESMP and SEP implementation. Core responsibilities will be clearly communicated to all relevant personnel, ensuring they have the necessary knowledge and skills to meet ESMP requirements.

Table 4-1. Responsibilities

Responsible Entity	Responsibilities	Activities
PIU	<ul style="list-style-type: none"> <li>- Overall implementation of SEP and Grievance Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- Assign Social Expert for SEP and GM implementation</li> </ul>

Responsible Entity	Responsibilities	Activities
	<ul style="list-style-type: none"> <li>- Coordination with ILBANK</li> <li>- Appointment of qualified Social Expert</li> <li>- Procurement, financial management, audit support, and reporting</li> <li>- Ensuring adequate organizational structure and staffing</li> </ul>	<ul style="list-style-type: none"> <li>- Oversee stakeholder engagement activities</li> <li>- Monitor grievance handling procedures</li> <li>- Report to ILBANK</li> <li>- Communicate responsibilities to staff</li> <li>- Manage procurement and financial processes</li> </ul>
Supervision Consultant	<ul style="list-style-type: none"> <li>• - Support PIU in monitoring implementation of SEP and ESMP</li> <li>- Provide technical advice and oversight</li> <li>- Ensure compliance with SEP and ESMP requirements</li> </ul>	<ul style="list-style-type: none"> <li>- Assign Social Expert for SEP and GM implementation</li> <li>- Oversee stakeholder engagement activities</li> <li>- Monitor grievance handling procedures</li> <li>- Report to ILBANK</li> <li>- Communicate responsibilities to staff</li> <li>- Manage procurement and financial processes</li> </ul>
Contractor	<ul style="list-style-type: none"> <li>• - Implement SEP-related tasks as specified in contract</li> <li>- Ensure site-level grievance mechanism is operational</li> <li>- Coordinate with Social Expert and PIU</li> <li>- Report grievances and stakeholder concerns</li> </ul>	<ul style="list-style-type: none"> <li>- Conduct stakeholder engagement at site level</li> <li>- Maintain grievance log and submit reports</li> <li>- Follow up on grievances with timely actions</li> <li>- Train workers on SEP requirements</li> </ul>

## 5. GRIEVANCE MECHANISM

The Grievance Mechanism (GM) is an important component of the stakeholder engagement process and prepared to receive, evaluate, find solutions and respond to complaints, feedback and requests, contributes positively to the progress of the project and greatly strengthens communication with stakeholders.

Within the scope of the Subproject, there are different platforms and channels through which grievances, requests and suggestions can be submitted by stakeholders. In line with ILBANK Environmental and Social Management System and World Bank's Environmental and Social Standard (ESS) 10, a grievance mechanism will be established by IMM to receive, resolve and follow up the concerns and grievances of the subproject affected communities. IMM PIU will be accessible to stakeholders and will respond to all grievances (complaints, requests, opinions, suggestions) as soon as possible. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded to by the PIU within a predetermined timeline and according to their content, and that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to complaints will be satisfactory to both parties and activities will be monitored and complainants will be informed of the results of corrective actions. In addition, the mechanism should be designed to accommodate the receipt and redress of anonymous complaints. The subproject will use the grievance submission form in Annex A and will allow anonymous submission of grievances. In addition, the subproject Grievance Mechanism will include a channel for receiving and addressing confidential grievances related to Sexual Exploitation, Abuse and Sexual Harassment where special measures are in place. IMM PIU is responsible for building close relationships with all stakeholders. In case a grievance is received in any of the grievance mechanisms presented below at different levels, the operational flowchart of the grievance mechanism will be followed. This scheme is presented in table:

Complaint Process	Requirements / Action
<p><b>Filing a complaint</b></p>	<p>Receipt of the grievance through any communication channel described in the SEP.</p> <p>(If the grievance is related with Gender Based Violence and or sexual abuse and harassment , immediate action will be taken within 2 days of receipt of the grievance. In cases of sexual abuse and harassment or potential child abuse at subproject sites, the complaint will be referred by the focal point (located at ILBANK headquarters)).</p>

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<b>Registering the complaint</b>	The sample complaint will be registered by making an entry in the registration table. All complaints will be logged and the complainant will be notified back within two working days. If the complainant requests that this complaint be handled anonymously, the complaint will be registered anonymously and this request will be applied.
<b>Referral of the complaint</b>	The grievance will be forwarded to the relevant persons responsible for handling the grievance (construction site manager and Project Implementation Unit specialists at the construction sites) no later than three working days after receipt (grievances involving emergency situations will be handled immediately as appropriate).
<b>Assessment of the complaint</b>	Evaluation of complaints within 10 working days and determination of whether the complaint meets the admissibility criteria.
<b>Responding to the complaint</b>	<p>If the grievance is valid, corrective measures to resolve the grievance shall be determined and taken within 15 business days at the latest. If it will take longer to resolve the grievance, a partial response should be provided to the complainant and a Grievance Closure Form should be completed.</p> <p>All comments and complaints will be responded to verbally or in writing if contact information is provided, preferably in accordance with the communication method specified by the complainant.</p>
<b>Recording the outcome of the complaint</b>	Entering the complaint result in the registration table
<b>Right of appeal</b>	<p>If the complaint cannot be resolved in the current process, applicants can always apply to the relevant legal authorities. These institutions can be summarized as follows:</p> <ul style="list-style-type: none"> <li>- Civil Courts of First Instance</li> <li>- Administrative Courts</li> <li>- Commercial Courts of First Instance</li> <li>- Labor Courts and</li> </ul>

	- Ombudsman ( <a href="https://ebasvuru.ombudsman.gov.tr/">https://ebasvuru.ombudsman.gov.tr/</a> )
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### 5.1. Grievance Mechanism at Subproject Level

In line with international standards and stakeholder engagement requirements, complaints should be addressed and resolved in a timely, impartial, effective, and efficient manner. The grievance mechanism provides a transparent and reliable process aimed at ensuring fair and sustainable outcomes. In this way, mutual trust and cooperation can be strengthened between Sub-Project stakeholders and IMM.

Accordingly, in line with World Bank standards, the Grievance Mechanism (GM) described below will be implemented by the Project Implementation Unit (PIU) for both external and internal stakeholders throughout all phases of the Sub-Project, including pre-construction, construction, and operation.

The grievance redress channels will operate in Turkish. Complaint forms and consultation records will be maintained in Turkish. Translation support will be provided where another language is required.

#### Sub-Project communication channels for grievances, requests, and suggestions

- **Website:** <https://www.izmir.bel.tr>
- **E-mail:** [info@izmir.bel.tr](mailto:info@izmir.bel.tr)
- **Telephone** +90 (232) 293 12 00
- **Call Center:** 153
- **Official correspondence and face-to-face application:** IMM Public Relations Unit Solution Desk, Konak Service Building, Cumhuriyet Boulevard No:1, Konak, İzmir
- **Online applications:**

The complaint mechanism will be operated by the PIU and the Contractor. In order to ensure that all directly and indirectly affected internal and external stakeholders are informed about the Sub-Project complaint process, the following communication tools will be used:

- Website
- E-mail
- Public meetings

- Telephone
- Written materials (brochures, posters, etc.)

### **Channels for submission of complaints**

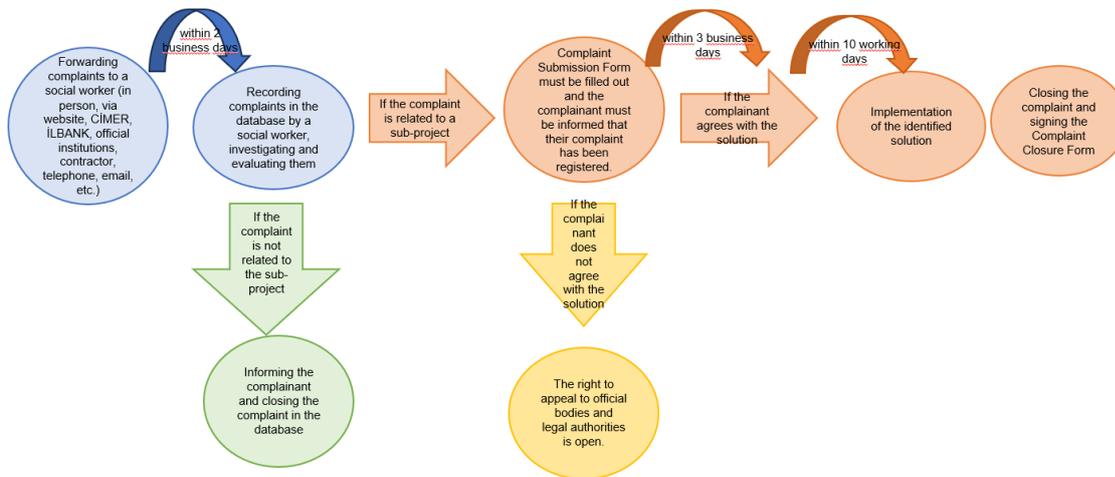
Complaints may be submitted through the following channels:

- Telephone (Call Center and relevant units)
- In-person applications to IMM and Contractor head offices / branches
- Grievance boxes (located in mukhtar offices)
- E-mail
- Meetings
- IMM's / Contractor's employees and public relations solution desk
- Written petitions submitted to IMM / Contractor
- Site visits and other relevant channels
- İLBANK

IMM has existing systems for tracking and resolving complaints submitted by stakeholders. Complaints received by the Human Resources and Training Department are transmitted through the system to the Public Relations Unit, which then forwards the complaint to the relevant departments. Once the relevant departments report the resolution process and response through the portal, the Public Relations Unit communicates the outcome to the complainant.

The flowchart below outlines the grievance management process to be applied under the Subproject. It illustrates the sequence of actions from the submission and registration of grievances to their assessment, resolution, implementation, and closure, together with the relevant timeframe for each step. The chart also shows the procedure to be followed in cases where a grievance is not related to the Subproject or where the complainant does not accept the proposed resolution.

## GRIEVANCE MANAGEMENT



The grievance management process to be applied under the Subproject will follow the following steps and timelines: All grievances submitted by stakeholders to the PIU or the contractor will be recorded by the PIU social specialist in the subproject grievance database. Each grievance will be reviewed and assessed within two (2) working days. If the grievance is found to be unrelated to the Subproject, the complainant will be informed accordingly and the case will be closed. For grievances related to the Subproject, the complainant will be informed within two (2) working days via phone and/or e-mail that the grievance has been registered. Possible solutions, including any proposal made by the complainant, will be evaluated, and the response approved by the PIU will be communicated to the complainant within three (3) working days following registration. Once an agreement is reached, the proposed solution will be implemented within ten (10) working days and the grievance will be closed. Accordingly, the period between receipt and closure of a grievance will not exceed fifteen (15) working days. Where this period cannot be met, the complainant will be informed of the reasons for the delay, and the case will be recorded accordingly. If the complainant does not agree with the proposed resolution, they may access the available appeal mechanisms. In such cases, the PIU will continue to monitor the process, including appeals submitted to official institutions, higher-level grievance mechanisms, or judicial authorities.

### Grievance Mechanism at National Level

Stakeholders may submit complaints and feedback at the national level through the Presidential Communication Center (CİMER), the Foreigners' Communication Center (YİMER), and İLBANK.

### Presidential Communication Center (CİMER)

CİMER provides a centralized complaint system for Turkish citizens, legal entities, and foreigners. It serves as an alternative and widely recognized channel through which Sub-Project stakeholders may submit project-related complaints and feedback directly to public authorities.

### Communication channels

- **Website:** [www.cimer.gov.tr](http://www.cimer.gov.tr)
- **Call Center:** 150
- **Telephone:** +90 312 525 55 55
- **Fax:** +90 312 473 64 94
- **Official Correspondence / Petition Address:** Presidency of the Republic of Turkey Directorate of Communications, Kızılırmak Mah. Mevlâna Bulvarı No:144, Çankaya/ANKARA
- **Mail:** On behalf of the Communications Directorate of the Presidency of the Republic of Turkey
- **Individual Applications:** Applications may be submitted in person at the public relations desks of governorships, district governorships, and ministries.

### Foreigners' Communication Center (YİMER)

YİMER is a centralized grievance system for foreigners living in Türkiye. It serves as an alternative and well-known channel through which Sub-Project stakeholders may submit project-related grievances directly to public authorities.

### Communication channels

- **Website:** [www.yimer.gov.tr](http://www.yimer.gov.tr)
- **Call Center:** 157
- **Telephone:** +90 312 515 71 22
- **Fax:** +90 312 920 06 09
- **Official Correspondence / Petition Address:** Republic of Turkey Ministry of Interior Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4, Yenimahalle / ANKARA
- **Mail:** Republic of Turkey Ministry of Interior Directorate of Migration Management

- **Individual Applications:** Applications may be submitted in person to the Directorate General of Migration Management.

### **İller Bankası A.Ş. (İLBANK) GM**

As of September 2021, İLBANK has had an established and formalized Grievance Policy. Through this policy, İLBANK aims to maintain transparent and comprehensive processes that allow any stakeholder—including Project Affected Persons (PAPs) and Other Interested Parties (OIPs)—to submit grievances, raise concerns, or provide feedback regarding project planning, implementation, or management processes. Such feedback is reviewed, evaluated, and managed/resolved in a timely manner by the relevant units within the Group of International Relations of İLBANK.

As of 24 December 2023, following the establishment of the Environmental and Social Management System (ESMS), İLBANK updated this Grievance Policy and transformed it into a Grievance Mechanism (GM). İLBANK's GM Policy is disclosed on its official website and is available to all stakeholders.

### **Communication channels for Sub-Project-related grievances**

- **Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **Email:** uidbbilgi@ibank.gov.tr
- **Telephone:** +90 312 508 79 79
- **Official Letter:** İLBANK Financial Institutions and Investor Relations Dept. , Emniyet Mahallesi Hipodrom Caddesi No:9/21, Yenimahalle/ANKARA

### **World Bank GRS**

The Grievance Redress Service (GRS) operated by the World Bank provides an institutional mechanism through which individuals or communities who believe they are adversely affected by a World Bank-financed project may submit complaints directly to the Bank. The GRS offers an additional avenue for recourse in cases where grievances are not resolved satisfactorily at the project or national level, or where complainants prefer to approach the Bank directly.

Complaints to the GRS may be submitted via the online grievance form, by e-mail, or in writing to the World Bank's country offices or headquarters in Washington, D.C. Submissions should include the project name, a description of the alleged impact, and contact details of the complainant; however, confidentiality may be requested and will be respected.

Upon receipt, the GRS registers the complaint, conducts an eligibility review, and coordinates with the relevant World Bank project teams to assess the issues raised. Complainants are kept

informed of the progress and outcome of the review process. The mechanism operates in accordance with principles of transparency, accountability, and confidentiality.

### **Mechanism for Handling Complaints of Harassment, Violence and Discrimination**

Within the scope of the Sub-Project, complaints on issues such as Gender Based Violence, Sexual Exploitation and Abuse and Sexual Harassment will be handled with special sensitivity.

Such cases will be managed in accordance with ethical principles and on the basis of confidentiality, with due regard for the safety of the victim. Considering that victims may be reluctant to report due to social pressures, a Grievance Mechanism (GM) has been designed to allow for safe and confidential reporting. This issue will be emphasized during trainings.

If necessary, necessary notifications will be made to the relevant public institutions and an independent process will be carried out. The identity of the victim will be protected and necessary measures will be taken to prevent secondary victimization.

### **Appeal Mechanism**

Stakeholders whose grievances cannot be resolved through the existing GM or whose grievances involve sensitive issues can always apply to the relevant legal institutions. This right will be clearly emphasized in every meeting and training on the GM.

Complaints that have been forwarded to higher grievance mechanisms or legal authorities for any reason will be followed up by the PIU and necessary explanations will be recorded in the database.

## **5.2. Grievance Mechanism for Workers**

Worker Grievance mechanism is defined as complaints from sub-project employees (including both direct and indirect employees). This mechanism is structured with an intention of it being an effective approach for early identification, assessment, and resolution of grievances throughout the sub-project's lifespan. The Grievance Mechanism should guarantee that any employee raising a complaint will not be subject to any reprisal.

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

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

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

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

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

Complaints should be investigated as soon as possible to prioritize resolution. In accordance with ILBANK GM Procedures, complaints that involve immediate risks to workers' livelihoods or safety must be addressed within 24 hours. Other complaints should be resolved within the established timeframe of 7 business days. Detailed records of the investigation and resolution process should be maintained for all complaints.

The detailed procedure of the workers' grievance mechanism will be described in the sub project specific LMP based on CDRC Project Labour Management Procedures<sup>5</sup>. The officer appointed by IMM for the Worker Grievance mechanism will receive suggestions and complaints in writing with the Sample Grievance Form (Appendix-A). Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Appendix -B). Thus, all activities carried out under the grievance mechanism will be recorded and care will be taken to establish a transparent relationship between workers and the sub-project owner.

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<sup>5</sup> [https://www.ilbank.gov.tr/storage/uploads/uidb/cdrpc\\_labor\\_management\\_procedure\\_lmp\\_1685916683.pdf](https://www.ilbank.gov.tr/storage/uploads/uidb/cdrpc_labor_management_procedure_lmp_1685916683.pdf)

## 6. MONITORING AND REPORTING

### 6.1. Summary of how SEP implementation will be monitored and reported

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

Contractors will deliver ESMRs to the IMM monthly and quarterly. After reviewing these ESMRs, IMM will submit the ESMRs on its environmental and social performances to ILBANK as quarterly, along with a summary of the grievances log (including the grievance logs as an annex) and summary of stakeholder engagement activities conducted during the reporting period.

The grievance mechanism established for the sub-project will be used effectively and the statistical summary of the outputs of the grievance mechanism will be reported to IMM and WB on monthly and quarterly basis.

Moreover, ESMRs will be submitted to WB by ILBANK biannually together with Project's Progress Reports. IMM will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national/international regulations and lenders' requirements.

The key performance indicators to be used during the implementation of this SEP are set out in **Error! Reference source not found.**

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**Table 6-1.** Reporting Process Requirements and Distribution of Roles

No	KPI	Sources	Sub-Project Phase	Monitoring Measures	Assessment Frequency	Responsible Party
1	<ul style="list-style-type: none"> <li>- Decrease in number of grievances received</li> <li>- Increase in grievance closeout rate (closed grievances /total number of grievances)</li> <li>- Decrease in time of grievance closeout,</li> <li>- Zero grievances not closed out within the target timeframe</li> </ul>	<ul style="list-style-type: none"> <li>- Number and type of grievances, including the following details:</li> <li>- Gender, province, category of grievance, status of grievances (closed, pending, resolved), etc.</li> <li>- Number of invalid grievances</li> </ul>	Construction and Operation	Database	Monthly	IMM
2	90% of grievances responded in the target timeframe of one month	Number of grievances responded in the target timeframe of one month	Construction and Operation	Database	Monthly	IMM
3	Regular reporting to stakeholders on the results of the Grievance Mechanism	Providing feedback to stakeholders on the implementation of the Grievance Mechanism (the number and type of consultations, number of participants, type of stakeholders engaged etc.)	Construction and Operation	Reporting	Monthly	IMM
4	Annual monitoring of closing the targeted 90% of the grievances within one month to the satisfaction of the complainant	Internal monitoring of the Grievance Mechanism to ensure that the Grievance Mechanism is implemented and that grievances are adequately handled	Construction and Operation	Inspection Report	Monthly	IMM
5	<ul style="list-style-type: none"> <li>- Increase in the number of stakeholder activities</li> <li>- Increase in the number of participants to the stakeholder engagement activities</li> <li>- Increase in the number of different group of stakeholders (as group or person)</li> </ul>	<ul style="list-style-type: none"> <li>- Number of Planned Stakeholder Engagement Activities</li> <li>- Type of planned Stakeholder Engagement Activities</li> <li>- Number of participant stakeholders</li> <li>- Type of participant stakeholders</li> <li>- (Activity records, meeting minutes, participant records and related reports, documents, etc.)</li> </ul>	Construction and Operation	Reporting	Monthly	IMM

## **6.2. Reporting back to stakeholder groups**

The results of environmental and social monitoring activities will be communicated to relevant stakeholder groups in a timely and accessible manner. Monitoring outcomes, including key environmental and social performance indicators, identified non-compliances, and corrective actions, will be disclosed through appropriate channels such as stakeholder consultation meetings, summary reports, and public information platforms.

Information shared with stakeholders will be presented in a clear and non-technical format to ensure transparency and understanding. Where relevant, feedback received from stakeholders regarding the disclosed monitoring results will be documented and taken into consideration in the ongoing implementation of environmental and social management measures.

## ANNEXES

### Annex-A Sample Grievance Submission Form

<b>Izmir Metropolitan Municipality</b> 	<b>Izmir Metropolitan Municipality</b> <i>Izmir Province, Konak District, Ege Neighbourhood Bridge Crossing Project</i> <b>PROJECT NO: 24/004</b>			
	<b>GRIEVANCE FORM</b>			
Form Completed by:	Date and Time:			
Subject of Meeting:	Izmir Metropolitan Municipality PROJECT NO: 24/004			
<b>1. PARTICULARS OF THE COMPLAINANT</b>				
Name-Last Name:	<b>Grievance Communicated by:</b>			
TR ID No:	Telephone / Toll Free Number	<input type="checkbox"/>		
Telephone:	Face-to-Face Meeting	<input type="checkbox"/>		
Address:	Website / E-mail	<input type="checkbox"/>		
E-mail:	Other (Describe)	<input type="checkbox"/>		
<b>Type of Stakeholder</b>				
Governmental Body <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Focus Groups <input type="checkbox"/>	Union of Industries <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
<b>2. DETAILED INFORMATION ON THE GRIEVANCE</b>				
Description of the grievance:				
Solution method requested by the complainant				

Recorded by  
Name-Last Name/Signature

Complainant  
Name-Last Name/Signature

### Annex-B Sample Grievance Closure Form

<p>Izmir Metropolitan Municipality</p>  <p>İZMİR BÜYÜKŞEHİR BELEDİYESİ</p>	<p>Izmir Metropolitan Municipality Izmir Province, Konak District, Ege Neighbourhood Bridge Crossing Project PROJECT NO: 24/004</p>
<p>Izmir Metropolitan Municipality PROJECT NO: 24/004</p>	
<b>3. DETERMINATION OF THE CORRECTIVE ACTION</b>	
<b>1</b>	
<b>2</b>	
<b>3</b>	
<b>4</b>	
<b>5</b>	
<b>Responsible Departments</b>	
<b>4. GRIEVANCE CLOSURE</b>	
<p><i>This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.</i></p>	

Grievance Closure Date:

Grievance Closer's Full Name/Signature:

Complainant's Full Name/Signature:

**Annex-C Sample Key Informant Interview Form (For Single Stakeholder Interviews)**

Interview Info	Stakeholder Info	Role & Awareness	Key Issues & Perceptions	Impacts & Mitigation	Expectations & Recommendations	Grievance & Follow-up
<b>Project Name:</b>	<b>Name:</b>	<b>Role related to project:</b>	<b>Perceived benefits:</b>	<b>Expected positive impacts:</b>	<b>Expectations from project:</b>	<b>Awareness of grievance mechanism:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Sub-Project / Component:</b>	<b>Institution / Organization:</b>	<b>Level of involvement:</b> <input type="checkbox"/> Direct <input type="checkbox"/> Indirect <input type="checkbox"/> Advisory	<b>Main concerns / risks:</b>	<b>Expected negative impacts:</b>	<b>Expectations from project owner / contractor:</b>	<b>Preferred grievance channel:</b> <input type="checkbox"/> Phone <input type="checkbox"/> Email <input type="checkbox"/> Online <input type="checkbox"/> In-person
<b>Date:</b>	<b>Position / Title:</b>	<b>Awareness of project:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Limited	<b>Environmental concerns:</b>	<b>Suggested mitigation measures:</b>	<b>Communication &amp; engagement expectations:</b>	<b>Follow-up required:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Location:</b>	<b>Stakeholder category:</b> <input type="checkbox"/> Gov <input type="checkbox"/> Municipality <input type="checkbox"/> NGO <input type="checkbox"/> Private <input type="checkbox"/> Community <input type="checkbox"/> Other	<b>Source of information:</b>	<b>Social / traffic / access concerns:</b>	<b>Comments on mitigation measures:</b>	<b>Stakeholder recommendations:</b>	<b>Consent to use information:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Interview method:</b> <input type="checkbox"/> Face-to-face <input type="checkbox"/> Online <input type="checkbox"/> Phone	<b>Area of influence / responsibility:</b>	<b>Previous experience with similar projects:</b>	<b>Overall perception of the project:</b>	<b>Additional impact notes:</b>	<b>Additional comments:</b>	<b>Interviewer name &amp; signature:</b>

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

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