

# **TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT(PUMREP)**

**Yücekapı Municipality, Ağrı Province**

**700 kW SOLAR POWER PLANT PROJECT**

**STAKEHOLDER ENGAGEMENT PLAN (SEP)<sup>1</sup>**

**March 2026**

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<sup>1</sup> This document is a translation of the Turkish version. If there are any inconsistencies between the two documents, the Turkish version shall prevail.

## Sub-Project Information

Sub-Project Name	Yücekapı Municipality 700 kWe Solar Power Plant Project under Public And Municipal Renewable Energy Project (PUMREP)
Sub-Project Owner	Ağrı Province - Eleşkirt District Yücekapı Municipality
Financial Intermediary	Provinces Bank Inc. (İLBANK)
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## List of Abbreviations

AC	Alternating Current
ADNKS	Address-Based Population Registration System
CIMER	Presidential Communication Center
DC	Direct Current
E&S	Environmental and Social
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Report
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
ETL	Energy Transmission Line
GBV	Gender-Based Violence
GBV	Gender-Based Violence
GIIP	Good International Industry Practices
GM	Grievance Mechanism
İLBANK	İller Bankası A.Ş.
kWe	kilowatt, a unit of electrical installed capacity
kWp	kilowatt-peak (peak power of a photovoltaic panel)
MWh	megawatt-hour (energy unit)
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAP	Project Affected Persons
PCM	Public Consultation Meeting
PIU	Project Implementation Unit
PUMREP	Public and Municipalities Renewable Energy Project in Turkey
PV	Photovoltaic
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment

SEP	Stakeholder Engagement Plan
SMS	Short Message Service
SPP	Solar Power Plant
TÜİK	Turkish Statistical Institute
WB	World Bank

## EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy (PUMREP) Project was launched with the support of the World Bank and the financial intermediary role of İller Bankası A.Ş. (İLBANK) to accelerate the adoption of sustainable energy practices in public and municipal institutions in Turkey. The project aims to strengthen energy security, reduce greenhouse gas emissions, and contribute to sustainable development goals by providing financial and technical support for energy efficiency and renewable energy investments in the public sector.

Within this framework, Yücekapı Municipality is planning to implement a sub-project under PUMREP to construct a 700 kWe solar power plant (SPP). The sub-project will be established on municipal-owned land parcel no. 122/16 in the Yücekapı neighborhood of Eleşkirt district, Ağrı province. The primary objective of the sub-project is to reduce energy costs by meeting the municipality's energy needs through renewable sources and to contribute to the region's economic development. The power plant, expected to generate approximately 1,390 MWh of electricity annually, will also contribute to strengthening local energy supply security.

This Stakeholder Engagement Plan (SEP) has been prepared by Yücekapı Municipality to provide all stakeholders—including affected parties, other interested parties, and vulnerable groups—with relevant, timely, and accessible information about the Sub-Project throughout its entire lifecycle. The Plan is an integral part of the Sub-Project's environmental and social management and is based on compliance with the World Bank's Environmental and Social Standards (ESS), particularly ESS 10: Stakeholder Engagement and Information Disclosure.

The primary objective of the SEP is to enable stakeholders to express their views and concerns regarding the Sub-Project in a transparent, inclusive, and constructive dialogue environment. This document serves as a roadmap for Sub-Project management, outlining the necessary participation and feedback mechanisms (e.g., information meetings, grievance management system, etc.) to address stakeholder expectations, minimize potential adverse impacts, and ensure the Sub-Project is implemented in a socially acceptable manner.

# 1. INTRODUCTION/PROJECT DESCRIPTION

## 1.1. Objectives

PUMREP aims to support the Government of the Republic of Turkey in increasing the use of renewable energy in the public sector by focusing on central government buildings and municipalities. The project will contribute to the widespread adoption of renewable energy applications in public facilities; help the public sector serve as a model for the use of sustainable energy solutions; support the country's climate change mitigation goals; and assist in strengthening energy supply security. Yücekapı Municipality is implementing a Sub-Project funded under PUMREP. Therefore, this plan has been prepared to define the stakeholder engagement process and the management of the grievance mechanism to be carried out within the scope of the Sub-Project.

PUMREP is funded by the World Bank to support the implementation of renewable energy technologies in municipalities. İller Bankası A.Ş. (İLBANK) serves as the Financial Intermediary. Renewable energy installations will primarily be used to offset energy consumption from public facilities (such as administrative buildings, water supply and treatment plants, public lighting, etc.) and thereby contribute to reducing municipalities' energy bills.

Within this scope, the 700 kWe capacity Solar Power Plant (SPP) Project, implemented by Yücekapı Municipality, is planned to be established on municipal-owned land parcel no. 122/16 in Yücekapı Neighborhood, Eleşkirt District, Ağrı Province. The sub-project aims to contribute to the promotion of renewable energy, the reduction of greenhouse gas emissions, and efforts to combat climate change. By utilizing solar energy, the project seeks to reduce dependence on fossil fuels and minimize environmental impacts associated with energy production. The plant, expected to generate approximately 1.390 MWh of electricity annually, is projected to help reduce the municipality's energy costs and strengthen local energy supply security.

In accordance with the environmental and social risk screening process conducted by İLBANK, the Sub-Project has been classified in the medium-risk category. Within the scope of the Sub-Project, an Environmental and Social Management Plan (ESMP) and a Stakeholder Engagement Plan (SEP) have been prepared. Within this scope, it is planned to address the environmental and social risks and impacts of the Sub-Project in a manner consistent with the İLBANK Environmental and Social Management System. Stakeholder engagement will be conducted with particular consideration of the requirements of the World Bank's Environmental and Social Standard 10 (Stakeholder Engagement and Information Disclosure).

Yücekapı Municipality will be responsible for conducting stakeholder engagement activities and managing grievances. The contractor selected through a competitive bidding process will be responsible for the design, construction, logistics, testing, and commissioning of the solar power plant, as well as its provisional acceptance. The Consultant (Construction Supervision Consultant) appointed by the municipality will support coordination among the municipality, the contractor, and İLBANK during the implementation of the Sub-Project and assist in monitoring the implementation.

This Stakeholder Engagement Plan (SEP) is an action plan prepared for Yücekapı Municipality's 700 kWp Solar Power Plant Sub-Project, outlining the fundamental methods for effective communication and interaction with stakeholders. By defining an approach to gathering stakeholder opinions and concerns, ensuring regular and accessible information sharing, and systematically addressing grievances, the SEP supports the transparent and inclusive implementation of the Sub-Project.

## 1.2. Components

The Yücekapı Municipality SPP Project involves the construction and operation of a grid-connected photovoltaic (PV) solar power plant. The main technical components of the Sub-Project are as follows:

- **Solar Panels:** High-efficiency monocrystalline solar panels with a total installed capacity of 981.76 kWp.
- **Inverters:** Inverter units that convert the direct current (DC) generated by the panels into alternating current (AC).
- **Substation:** A substation for feeding the generated electricity into the grid.
- **Energy Transmission Line(ETL):** A connection line approximately 32 m long from the substation to the national grid ( Figure1 ).

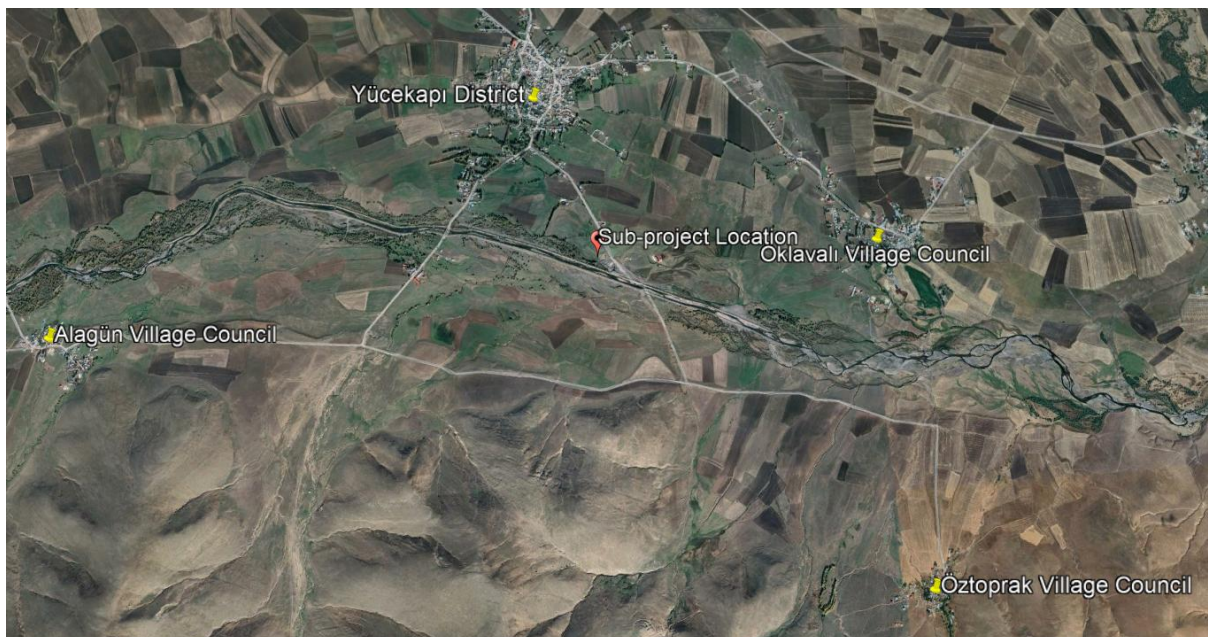


Figure1 Layout of the area where the solar power plant will be constructed within the parcel and the ETL

### 1.3. Location

The Sub-Project is located in Yücekapı Neighborhood, Eleşkirt District, Ağrı Province. The Sub-Project area is situated on parcel no. 122/16, which is owned by Yücekapı Municipality (Figure2 ). The total area of the parcel is approximately 40,000 m<sup>2</sup>, and it is planned to utilize approximately 11,000 m<sup>2</sup> of this area for the Solar Power Plant. Since the land is owned by the municipality, no expropriation activities are anticipated. Access to the Sub-Project site will be provided via existing roads.

The settlements closest to the Sub-Project area, based on distance, are Yücekapı (1.1 km), Oklavalı (1.8 km), Öztoprak (3.1 km), and Alagündür (3.7 km).



**Figure2 : Sub-Project Location and Nearby Settlements**

#### **1.4. Area of Influence**

The Sub-Project Area of Influence refers to the geographic region where the Sub-Project's environmental and social impacts are expected to occur. This area encompasses locations affected by construction, operation, and maintenance activities, local ecosystems, surrounding settlements, and existing infrastructure. Defining the area of influence is crucial for the Environmental and Social Management Plan (ESMP) Checklist as it enables a comprehensive assessment of potential risks and the development of mitigation strategies to minimize adverse impacts. Appropriate management measures will be implemented within the defined area to effectively address these impacts.

The direct area of influence of the sub-project has been defined as the project site and the surrounding area within a 500-meter radius (primary area of influence). However, since material and equipment shipments pass through Yücekapı Neighborhood, the section of the route passing through the residential area of Yücekapı Neighborhood has been evaluated within the general area of influence to manage indirect and temporary impacts caused by transportation.

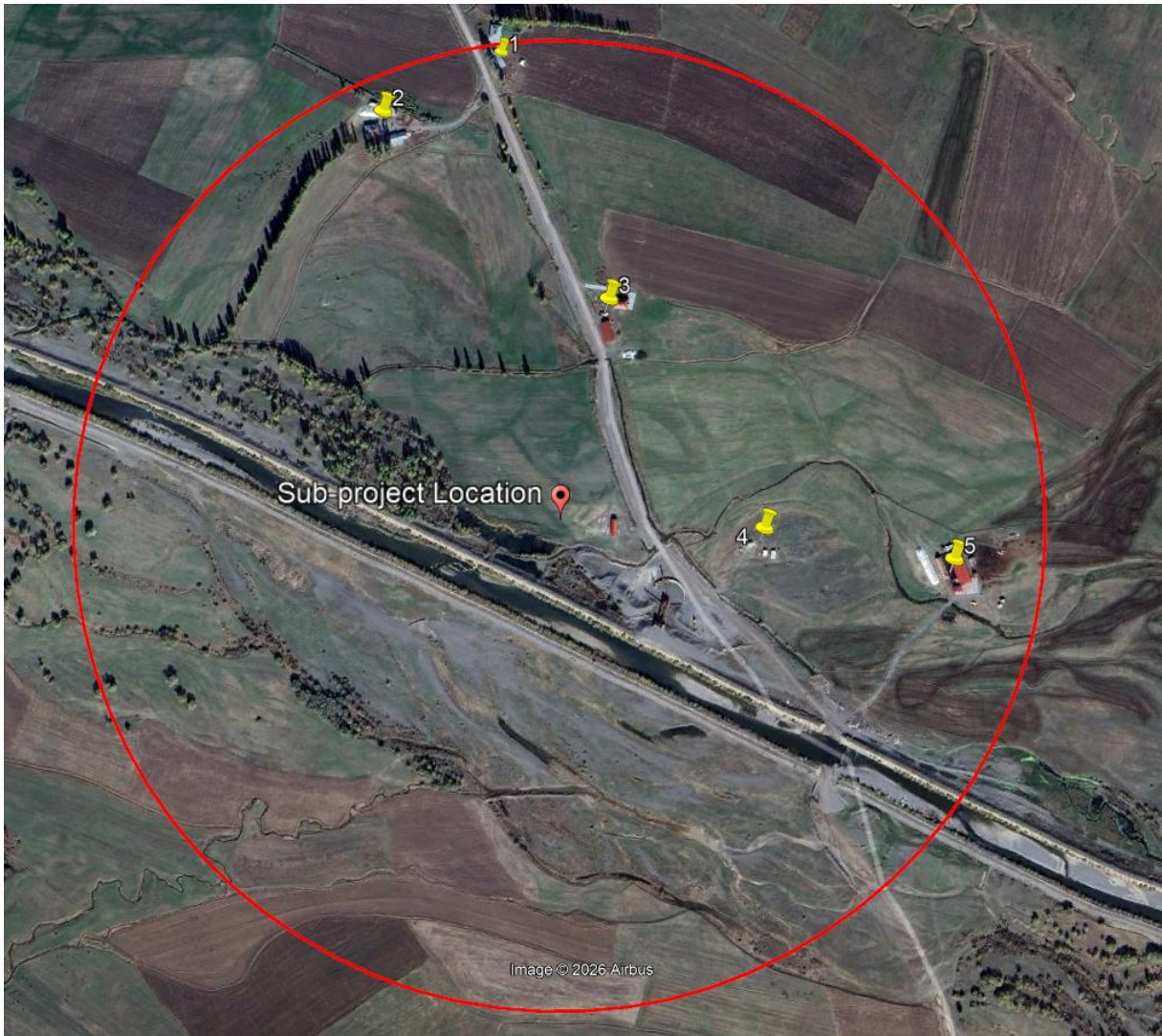
The direct area of influence of the Sub-Project is limited to the Sub-Project site on parcel 122/16. Since impacts such as dust and noise are likely to originate primarily from the construction phase of the SPP installation activities, the area within a 500-meter radius around

the project site has been evaluated as the primary area of influence (**Hata! Başvuru kaynağı bulunamadı.** ) and the immediate vicinity.

The structures located within the 500-meter radius around the project site are numbered and shown in Figure 3 (1 and 3: residential homes; 2 and 5: farms; 4: temporary tents set up seasonally by beekeepers). During a site visit conducted by the firm preparing the EIA, it was observed that the beekeepers' tent was not set up and the area was vacant. It is understood that the aforementioned farms within the area of influence are used during the summer season. During preliminary interviews conducted on February 13, 2025, with the households in the area, it was noted that stakeholders generally viewed the Sub-Project favorably and expressed the opinion that short-term noise and dust that may arise during the construction period would not pose a problem; visuals from the interviews are provided in Appendix 6.

The length of the Energy Transmission Line (ETL) required for grid connection under the Sub-Project is approximately 32 meters. Regarding transportation activities, the route to be used for the shipment of materials and equipment will be provided via the existing road network and includes sections passing through the residential area of Yücekapı Neighborhood. Although heavy vehicle traffic is expected to be limited in number and duration, necessary measures will be planned regarding traffic safety, pedestrian safety, noise, and dust impacts. In this context, it is anticipated that shipments will be conducted during appropriate hours, speed limits will be adhered to, necessary directional and warning signage will be provided, and traffic management measures will be implemented as needed.

Residential areas near the Sub-Project site, as determined by distance, are Yücekapı (1.1 km), Oklavalı (1.8 km), Öztoprak (3.1 km), and Alagün (3.7 km). Considering these distances, it is expected that impacts will be largely limited to the Sub-Project site and access activities.



**Figure3 Sub-Project Primary Area of Influence – Receptor points within a 500 m radius (1: Household, 2: Farm, 3: Household, 4: Beekeeper’s Tent, 5: Farm)**

For the transportation route, the route shown in FigureFigure4 ) will be used, passing through the Yücekapı Neighborhood after branching off from the E80 highway. The impacts of transportation activities are limited to the immediate vicinity of the road along the route, and low speeds and basic traffic safety measures will be implemented in sections near residential areas. In particular, during construction-phase shipments, speeds will be reduced when passing through sections near residential areas, traffic rules will be strictly followed, and basic guidance/warning measures will be taken as needed to support safe passage.

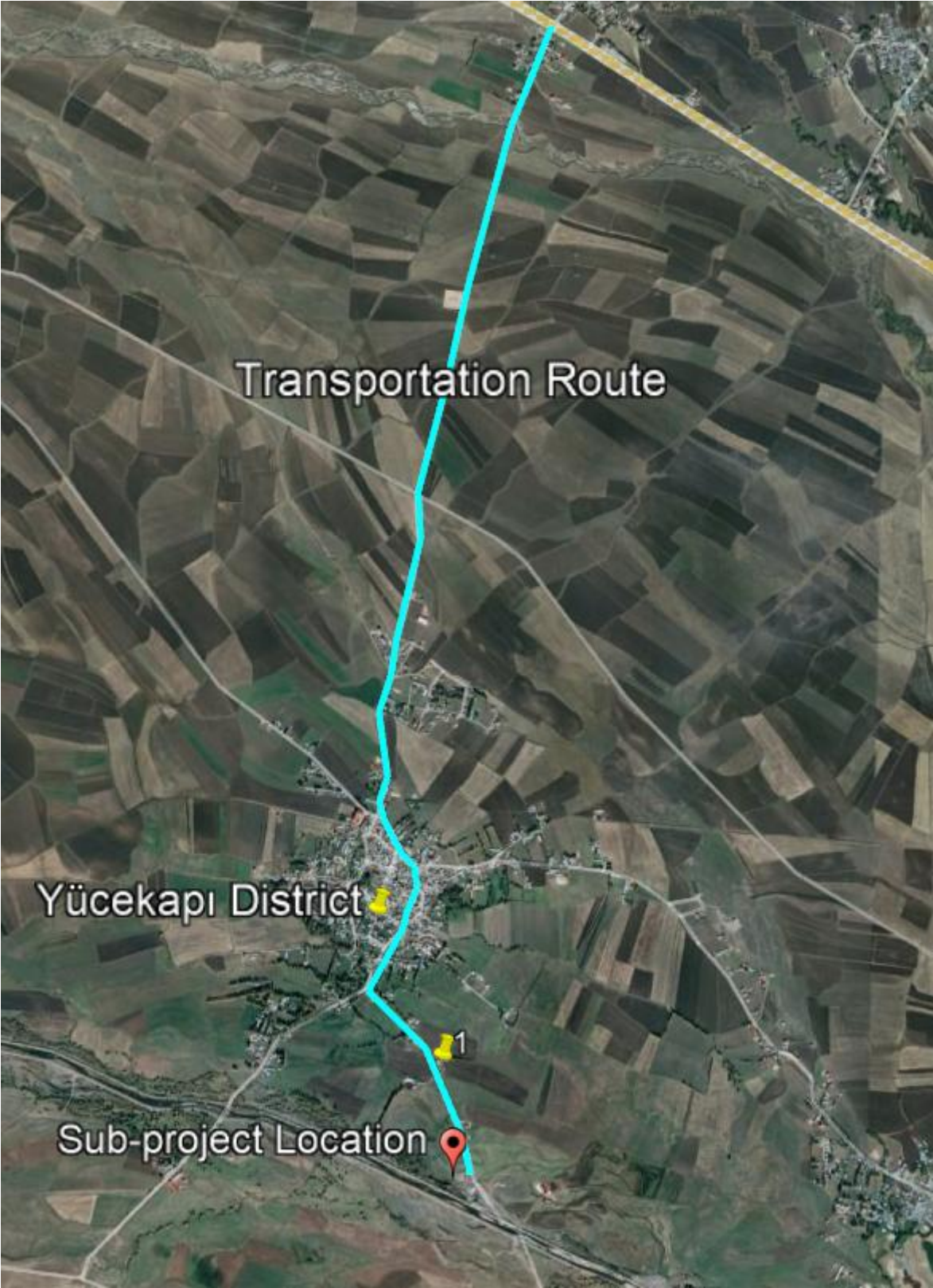


Figure4 Transportation Route

## 2. OBJECTIVE/DESCRIPTION OF THE STAKEHOLDER ENGAGEMENT PLAN

This Stakeholder Engagement Plan (SEP) has been prepared within the scope of the 700 kWe capacity Solar Power Plant (SPP) Sub-Project being implemented by Yücekapı Municipality. The purpose of the SEP is to provide all stakeholders with timely and accessible information regarding the potential environmental and social impacts of the sub-project and to establish a participation process through which stakeholders can convey their views and concerns. The objectives of Yücekapı Municipality's Stakeholder Participation Plan are outlined below:

- To establish a systematic stakeholder engagement approach that helps identify the Sub-Project's stakeholders and how they may be affected by the Sub-Project, and to contribute to its implementation in a manner that supports the establishment of constructive relationships with stakeholders.
- To understand stakeholders' interest in and expectations regarding the Sub-Project; to guide communication and consultation activities with stakeholders throughout the Sub-Project's construction and operation phases; and to ensure that stakeholder feedback contributes to the implementation of the Sub-Project and the improvement of its environmental and social performance.
- To promote effective and inclusive engagement with stakeholders on issues related to potential impacts throughout the Sub-Project and to define the methods to be used for this engagement.
- To establish an approach for presenting information regarding environmental and social risks and impacts related to the Sub-Project to stakeholders in a timely, understandable, accessible, and appropriate format.

Stakeholder participation is crucial for gathering feedback, identifying potential risks at an early stage, and developing appropriate measures during the preparation and implementation of the Sub-Project. This SEP provides a framework for stakeholder engagement; it broadly defines the timing and methods of interaction with different stakeholder groups. The SEP also includes an approach aimed at facilitating access to stakeholder engagement activities for vulnerable groups.

Through the implementation of the SEP:

- Increased awareness among stakeholders regarding the Sub-Project and its expected benefits,

- Early identification of stakeholder concerns and issues that could pose risks to the Sub-Project or stakeholders,
- Contributing to the planning of mitigation measures in a feasible and effective manner, and
- Establishing a communication and feedback mechanism that can be sustained throughout the Sub-Project and, if necessary, beyond.

### 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

During the process of identifying and classifying stakeholders, the nature of the Sub-Project's potential impacts is assessed; the methods of communication and engagement with stakeholders, as well as the frequency of these activities, are determined.

Special effort should be made to identify disadvantaged and vulnerable groups that may be affected differently or disproportionately by the Sub-Project or that may face difficulties in accessing and participating in stakeholder engagement processes. Stakeholder identification is also an ongoing process and should be reviewed regularly and updated as necessary.

#### 3.1. Methodology

The stakeholder identification process involves the systematic identification of stakeholders who are involved in or may be affected by the Sub-Project. During this process, stakeholders' levels of interest and impact, as well as their information and communication needs, are assessed.

To meet best practice standards, the following principles regarding stakeholder participation will be applied within the scope of the Sub-Project:

**Transparency and lifecycle approach:** Public information sessions and consultation meetings will be held at all stages of the Sub-Project; these meetings will be conducted without any pressure, coercion, or intimidation.

**Informed participation and feedback:** Stakeholders will be provided with sufficient information in appropriate formats; they will be given the opportunity to convey their views, comments, and concerns, and the feedback received will be evaluated, with necessary issues addressed.

**Inclusivity and sensitivity:** Stakeholder identification efforts will be kept up to date throughout the duration of the sub-project, and the participation process will be conducted in an inclusive manner. All stakeholders will be encouraged to participate in information-sharing and consultation processes; equality of access to information will be ensured. When selecting participation methods, stakeholders' needs will be taken into account; approaches suitable for the circumstances of vulnerable groups and different cultural/ethnic groups will be adopted to reduce the risk of exclusion.

**Flexibility:** In situations where in-person interaction is not appropriate, the stakeholder communication strategy will be adapted to include alternative methods such as telephone calls, online meetings, and similar options.

**Alignment with ESS10:** In accordance with the WB ESS10, stakeholders have been identified as parties that may be affected by the Sub-Project and other interested parties who may have an interest in the Sub-Project. Within this scope, stakeholders are categorized into two main groups: "Project Affected Persons" and "other interested parties."

### **3.2. Affected Parties and and Other Interested Parties**

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

"Sub-Project Affected Persons" (PAP), on the other hand, include individuals and groups whose physical environment, health and safety, well-being, or livelihoods may be subject to actual impacts due to the Sub-Project or who may face risks in these areas. These stakeholders may include individuals and groups, including local communities.

According to 2025 data from the Turkish Statistical Institute's (TÜİK) Address-Based Population Registration System (ADNKS), approximately 2,015 people reside in Yücekapı Neighborhood during the winter season. It was stated during meetings held with Yücekapı Municipality officials on October 19, 2025, that the population increases seasonally during the summer months and can reach approximately 5,000 people.

The area of influence was determined by considering the site where the Sub-Project will be implemented and its immediate surroundings. In this context, the area within a 500-meter radius of the site—where the planned solar power plant (SPP) on parcel 122/16 is expected to cause more intense effects such as dust and noise during the construction phase—has been designated as the primary area of influence.

Additionally, the route where transportation activities will take place was evaluated by considering the immediate vicinity of the road. Within the Sub-Project's area of influence, it was determined that there is a residential house approximately 200 m away from the Sub-Project site as the crow flies and an agricultural storage facility approximately 350 m away. Based on as-the-bird-flies distances, the settlements near the Sub-Project site were identified as Yücekapı (1.1 km), Oklavalı (1.8 km), Öztoprak (3.1 km), and Alagündür (3.7 km). Since Yücekapı is closer to the Sub-Project site than other settlements and is located along the transportation route, it is assessed that residents of the Yücekapı neighborhood may be relatively more affected by the Sub-Project.

The main stakeholder groups affected by the Sub-Project, with whom cooperation and consultation will be conducted within the scope of the Sub-Project, are listed below:

**People Affected by the Sub-Project (PAP):** These are individuals and groups that may be directly affected by the Sub-Project. Stakeholders in this group include:

- **Local Communities:** Yücekapı and its residents, which are the settlements closest to the Sub-Project site.
- **Sub-Project Workers:** Workers to be employed during the construction and operation phases.
- **Suppliers and Service Providers:** Businesses that may supply materials and services to the Sub-Project.
- **Relevant Infrastructure Organizations:** The electricity distribution company (Aras EDAŞ).
- **Public Facilities and Their Users:** One elementary school, one health center, and two mosques located in the Yücekapı neighborhood along the transportation route, as well as the users of these facilities (students, staff, patients/visitors, and worshippers). Their locations are provided in Appendix 7.

**Other Interested Parties (OIP):** These are parties not directly affected by the Sub-Project but involved in its implementation and management. Stakeholders in this group include:

**Local administrative units and relevant public institutions:** Ağrı Provincial Directorate of Environment, Urban Planning, and Climate Change and, the village councils of Şehit Engin, Esentepe, Yeşilyurt, and Oklavalı neighborhoods are included in this scope. The locations of the village councils and their distances from the project area are provided in Appendix 8.

- **Media and Civil Society Organizations:** Local/regional media outlets capable of informing the public about the Sub-Project, as well as civil society organizations active in the fields of environment, energy, or local development, are considered part of this group. According to the preliminary assessment, it is determined that there is no local media outlet or civil society organization within the Sub-Project area or its immediate vicinity capable of regularly receiving information about the Sub-Project or providing feedback.

### 3.3. Disadvantaged/Vulnerable Individuals or Groups

**Disadvantaged or vulnerable groups** are individuals or groups at risk of being disproportionately affected by the Sub-Project's potential impacts and/or who may face greater difficulties than other groups in accessing Sub-Project information and participating in stakeholder engagement activities. The needs of these groups will be specifically addressed in the stakeholder engagement strategy.

In the context of this Sub-Project, sensitivity is primarily related to temporary impacts that may arise during the construction phase (dust, noise, short-term traffic disruptions) and difficulties in accessing information and consultation processes (mobility constraints, literacy, digital access).

The vulnerable groups identified through the preliminary assessment conducted for the project area and its immediate surroundings, along with measures to facilitate their access to stakeholder participation, are outlined below. Although no significant adverse impact on these groups is anticipated due to the scale of the sub-project and the temporary/local nature of the impacts, the risk of disproportionate impact—particularly regarding access to information processes and short-term disruptions during the construction phase—has been taken into account:

**People with disabilities and those requiring special care:** 60 individuals. Due to mobility limitations, they may face difficulties participating in information meetings and accessing Grievance Mechanisms. Additionally, they may be more affected by short-term disturbances such as dust, noise, or temporary traffic disruptions. Information materials will be prepared in accessible formats, and meeting venues will be made accessible.

**Individuals aged 65 and older:** 200 people. Participation in meetings may be difficult due to mobility and health issues. They may be more bothered by temporary effects such as noise

and dust. Information and consultation activities will be conducted in easily accessible, central locations, taking into account the needs of older adults.

**Individuals with low literacy levels:** 20 people. They may have difficulty understanding written notices and using the Grievance Mechanism. Consequently, their access to information may be limited. Information will be provided through verbal communication, visual materials, and one-on-one meetings, and written materials will be prepared in simple and understandable language.

**Low-income/welfare-recipient households:** 80 households. When facing temporary disturbances such as dust or noise from construction, their capacity to cope with such situations may be more limited. Additionally, they may hesitate to use official grievance channels. Therefore, submitting grievances through the Grievance Mechanism will be encouraged, and grievances will be handled in an accessible manner.

## **4. STAKEHOLDER PARTICIPATION PLAN**

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

During the preparatory phase of the Sub-Project, stakeholder engagement was conducted as part of the preliminary assessments related to the Sub-Project. In this context, preliminary meetings were held with the relevant departments within the Yücekapı Municipality, and basic information regarding the Sub-Project area and its surroundings was compiled. To provide information about the Sub-Project and gather feedback from the local community, preliminary informational meetings were held on October 19, 2025, at the municipal building and at a local tea house in Yücekapı. These meetings were led and facilitated by representatives of the Consulting Firm (Mustafa Akgün, Director of the Consulting Firm), with the participation of the Mayor of Yücekapı, to establish communication with the local community; General information regarding the Sub-Project's purpose, scope, and implementation process was shared. During these meetings, participants' questions, opinions, and suggestions were gathered; preliminary assessments indicated that the local community's overall attitude toward the Sub-Project was positive. Visuals from the preliminary information meetings are presented in Appendix 5.

Additionally, preliminary meetings were held on February 13, 2026, with households located within a 500-meter radius of the Sub-Project site—an area considered critical in terms of social impact; general information about the Sub-Project was provided, and the initial views of stakeholders were gathered. Households were informed about potential negative impacts,

such as dust and noise, that may arise during the construction period. During these preliminary meetings, stakeholders expressed a generally positive attitude toward the Sub-Project, noting that these impacts would be short-term. Visuals related to these meetings are presented in Appendix 6.

## 4.2. Summary of Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Participation

Yücekapı Municipality is committed to ensuring transparent and open communication throughout all phases of the Sub-Project. The following methods are being used for stakeholder participation:

- **Public Consultation Meeting:** A Public Consultation Meeting will be organized following the draft approval by İLBANK of the ESMP Checklist and SEP. During the meeting, information will be provided regarding the scope of the Sub-Project, potential environmental and social impacts, and planned mitigation measures; stakeholders' questions, opinions, and suggestions will be gathered.
- **One-on-One Meetings:** Preliminary meetings were held on October 19, 2025, and February 13, 2026, as part of the Sub-Project. On October 19, 2025, informational meetings were held at the Yücekapı tea house and the Municipal Building with the participation of representatives from the consulting firm and the Mayor of Yücekapı. Local residents attended the meetings, and the Head of the Şehit Engin Neighborhood also participated in the meeting.  
On February 13, 2026, one-on-one meetings were held with households within a 500-meter radius, defined as the primary Sub-Project area of influence. During these meetings, information about the Sub-Project was provided; potential impacts, stakeholders' concerns, and suggestions were heard. No significant negative feedback regarding the Sub-Project was conveyed during the meetings. Stakeholders expressed that the construction phase could contribute to local employment and that the Sub-Project could positively contribute to the region's development; they indicated that they generally viewed the Sub-Project positively, assessing that potential impacts would be short-term and manageable.
- **Media Communication:** Announcements and updates regarding the Sub-Project will also be communicated to the public through local radio, television, newspapers, and the municipality's social media accounts.

### **4.3. Stakeholder Engagement Plan**

This plan defines the stages at which stakeholder engagement activities will be carried out throughout the Sub-Project's lifecycle and the general frequency at which they may be repeated. Once meeting locations and schedules are finalized, stakeholders will be informed through the municipality's official announcement channels and village council notice methods; additionally, direct communication with stakeholders will be established as needed.

The SEP assists in establishing stakeholder profiles and clearly defining the interaction between the Sub-Project and stakeholders. It is important to maintain communication with stakeholders in accordance with the established timeline. If necessary, the frequency of meetings and informational sessions may be increased.

As part of stakeholder engagement, a Public Consultation Meeting will be held prior to the start of the Sub-Project. The meeting will be held in person; information will be provided regarding the scope of the Sub-Project, potential environmental and social impacts, and planned mitigation measures, and stakeholders' questions, opinions, and suggestions will be gathered. This meeting will be held at least once and may be repeated during the Sub-Project process if deemed necessary. The Public Consultation Meeting will be conducted by Yücekapı Municipality.

The meeting will be announced through the municipality's official announcement channels and village council notice methods. To ensure households within a 500-meter radius of the Sub-Project site—an area deemed critical in terms of social impact—are informed of the meeting, direct notifications will be sent via the village council; additionally, where possible, telephone contact will be established with these households. To support the participation of vulnerable groups, the meeting venue will be accessible; the language used for information will be kept simple, and verbal explanations and visual materials will be used as needed. For individuals who may face difficulties in attending, alternative methods such as one-on-one meetings or collecting feedback via telephone may be implemented upon request.

Yücekapı Municipality will be responsible for the implementation of the stakeholder participation process. Even if all or part of the stakeholder participation activities are carried out by a third party, Yücekapı Municipality will remain ultimately responsible for the process.

**Table1 Stakeholder Participation Program**

Sub-Project Phase	Date/Duration	Meeting Topic	Meeting Method	Target Stakeholders
Pre-Construction	October 2025	Informing the Local Community About the Sub-Project	Two sessions were held in person at the municipal building and the community center with the participation of the consulting firm and the mayor	Yücekapı Local Community
	February 2026	Providing information about the Sub-Project to individuals located within 500 meters of the Sub-Project site (in the primary area of influence)	In-person	Stakeholders within the 500-meter primary area of influence
	March 2026	Providing all stakeholders with information about the environmental impacts of the sub-project	In-person	Yücekapı Local Community and stakeholders within the Primary area of influence
Construction	During Construction (If Necessary)	If grievances or requests are received from stakeholders after sub-project construction activities have begun	In person or through Yücekapı Municipality communication channels	Individuals affected by Sub-Project construction activities
Operation	During the Operation Phase (If Necessary)	If grievances or requests are received from stakeholders during the operational phase	In person or through Yücekapı Municipality communication channels	Individuals affected by the sub-project during the operational phase

#### 4.4. Reporting Back to Stakeholders:

Yücekapı Municipality will provide feedback on the opinions, suggestions, and grievances received as part of stakeholder engagement activities through regular and accessible methods throughout the sub-project's lifecycle. The purpose of this feedback is to clearly communicate to stakeholders which issues have been raised, how these issues were evaluated, and what actions were taken.

In this context, feedback will be provided through the following channels:

- Following public participation meetings and informational sessions, a meeting summary, a list of participants (with personal data protected), the main topics raised, and the responses will be prepared in a brief summary.

- For applications submitted through the Grievance Mechanism, the applicant will be notified that the application has been received; feedback regarding the review process and outcome will be provided to the relevant individual via an appropriate method (phone/SMS/written).
- During the progress and monitoring of the Sub-Project, key information regarding stakeholder participation (meetings held, main feedback received, decisions made, and measures to be implemented) will be shared publicly at regular intervals.

To inform stakeholders, the municipality's official communication channels (website and/or social media announcements), village council bulletin boards, and direct communication (telephone notifications) when deemed necessary will be utilized. For vulnerable groups and stakeholders who may face difficulties in accessing information, feedback may be provided through alternative methods such as verbal briefings and one-on-one meetings.

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

### 5.1. Sub-Project Implementation Unit (PIU)

The Sub-Project Implementation Unit (PIU), established within Yücekapı Municipality, will be ultimately responsible for the environmental and social management of the Sub-Project. The monitoring and coordination of environmental, social, and occupational health and safety (OHS) issues, including stakeholder participation, will be carried out by three staff members assigned within the PIU. The names and contact information of these individuals will be shared with stakeholders during the Public Consultation Meeting (PCM).

The primary responsibilities of the assigned staff are summarized below:

- **Environmental Officer:** Monitoring the implementation of environmental measures under the ESMP Checklist, evaluating environmental grievances, and maintaining necessary records.
- **Social Specialist:** Planning and conducting stakeholder engagement activities, documenting meetings and discussions, collecting stakeholder feedback, and providing feedback to stakeholders. As the Grievances Mechanism contact person: Receiving and documenting project grievances, coordinating investigation and

resolution processes, and submitting grievance records and closure information to İLBANK during reporting periods.

- **Occupational Health and Safety (OHSS) Officer:** Monitoring occupational safety and health practices during the construction phase, tracking work-related accident/incident reports, and ensuring relevant coordination.

PIU is responsible for planning, implementing, and monitoring stakeholder engagement activities. In this context, it will coordinate information and consultation processes with stakeholders, document the activities carried out, and ensure the evaluation of feedback received from stakeholders. The administrative resources required to carry out stakeholder engagement activities (such as staff time, announcement/information materials, and meeting organization) will be covered under the Sub-Project.

## 5.2. Resources

Yücekapı Municipality will provide the necessary human, administrative, and financial resources to ensure the effective implementation of activities under the Stakeholder Engagement Plan (SEP) and the Grievance Mechanism. Stakeholder engagement activities will be planned and implemented under the coordination of the Project Implementation Unit (PIU). Coordination will be maintained with the contractor regarding information needs arising from the contractor's on-site activities.

The primary resources to be utilized as part of the implementation of the SEP are summarized below:

- **Human resources:** Staff time and field coordination for the three personnel (environmental, social, and occupational safety and health) to be assigned within the PIU.
- **Meeting and outreach expenses:** Basic logistical needs such as venue/space organization and sound systems for the Public Consultation Meeting and any additional outreach meetings as needed.
- **Announcements and informational materials:** Preparation of announcement texts, printed materials such as brochures and posters, and dissemination via village bulletin boards and municipal channels.
- **Communication channels:** Providing information via the municipality's official website and/or social media accounts; informing stakeholders by phone and recording incoming feedback.

- **Records and archiving:** Systematic filing of meeting minutes, attendance lists (with personal data protected), interview notes, and grievance records.

Expenses for stakeholder engagement activities will be covered by the party primarily responsible for the activity (administration / consultant / contractor), and the scope and frequency of activities may be updated as needed based on field conditions.

### 5.3. Management Functions and Responsibilities

The Yücekapı Municipality Sub-Project Implementation Unit (PIU) is the primary party responsible for the implementation of the SEP. The PIU will coordinate the process through designated personnel tasked with conducting stakeholder engagement activities and operating the Grievance Mechanism (GM). The parties contributing to the implementation of the SEP and their respective duties and responsibilities are summarized at Table 2 :

**Table 2 Roles and Responsibilities in SEP Implementation**

Party	Responsibility
PIU (Project Implementation Unit)	Plan, coordinate, and monitor the implementation of the SEP; conduct stakeholder information and consultation activities; Organize the Public Consultation Meeting; operate and document the Grievance Mechanism; provide feedback on stakeholder input; ensure coordination with the contractor and consultant; coordinate the collection of necessary information and records for the preparation of the quarterly ESMR; review the quarterly ESMR prepared by the consultant and submit it to İLBANK.
Contractor	Prepare monthly ESMR reports and submit them to PIU; conduct stakeholder briefings on-site under PIU coordination; implement measures to mitigate impacts such as dust, noise, and traffic resulting from construction activities; documenting and forwarding grievances and feedback received at the site level to PIU; maintaining incident records for environmental, social, and labor-related non-conformities/incidents and workplace accidents, and immediately reporting critical incidents to PIU; operating the Grievance Mechanism for employees and implementing occupational safety and health (OHS) practices.

Consultant (Construction Supervision Consultant)	Monitor the contractor's compliance with the ESMP Check List and SEP requirements at the site level; provide corrective/preventive recommendations for identified non-conformities; Prepare a quarterly (3-month) Environmental and Social Monitoring Report (ESMR) based on the monthly ESMRs submitted by the contractor, grievance/incident records, and your own field observations, and submit it to Yücekapı Municipality; review the implementation of SEP and the maintenance of grievance records; provide technical support to PIU in the preparation of progress reports.
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## 6. GRIEVANCE MECHANİSM (GM)

Yücekapı Municipality will establish a transparent, easily accessible, and free Grievance Mechanism through which all stakeholders who may be affected by the Sub-Project's environmental and social impacts can submit their opinions, concerns, and grievances. The Grievance Mechanism will remain active throughout the entire lifecycle of the Sub-Project, including the preparation, construction, and operation phases.

### 6.1. National-Level Grievance Mechanism

Stakeholders may submit their grievances through CİMER (YİMER for foreign citizens) in accordance with relevant legislation. Additionally, applications submitted to İLBANK and relevant public institutions, where deemed necessary, will also be evaluated within this scope.

#### CİMER

Website: <https://www.cimer.gov.tr/>

Phone: 150

#### YİMER

Website: [yimer.gov.tr](http://yimer.gov.tr)

Phone: 157

#### İLBANK

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

E-mail: [uidbbilgi@ilbank.gov.tr](mailto:uidbbilgi@ilbank.gov.tr)

Phone: +90 312 508 79 79

## 6.2. Sub-Project Level Grievance Mechanism

### 6.2. Sub-Project Level Grievance Mechanism – Procedures and Timelines

The receipt, recording, evaluation, and resolution of grievances will be carried out by the Project Implementation Unit (PIU). The Grievance Mechanism is free of charge, and no fees will be charged to the complainant. Grievances may be submitted via telephone, website/online form, email, written petition/mail, and grievance box.

- Phone: (0472) 717 64 36
- Website / Email: [www.yucekapi.bel.tr](http://www.yucekapi.bel.tr) (Figure 5)

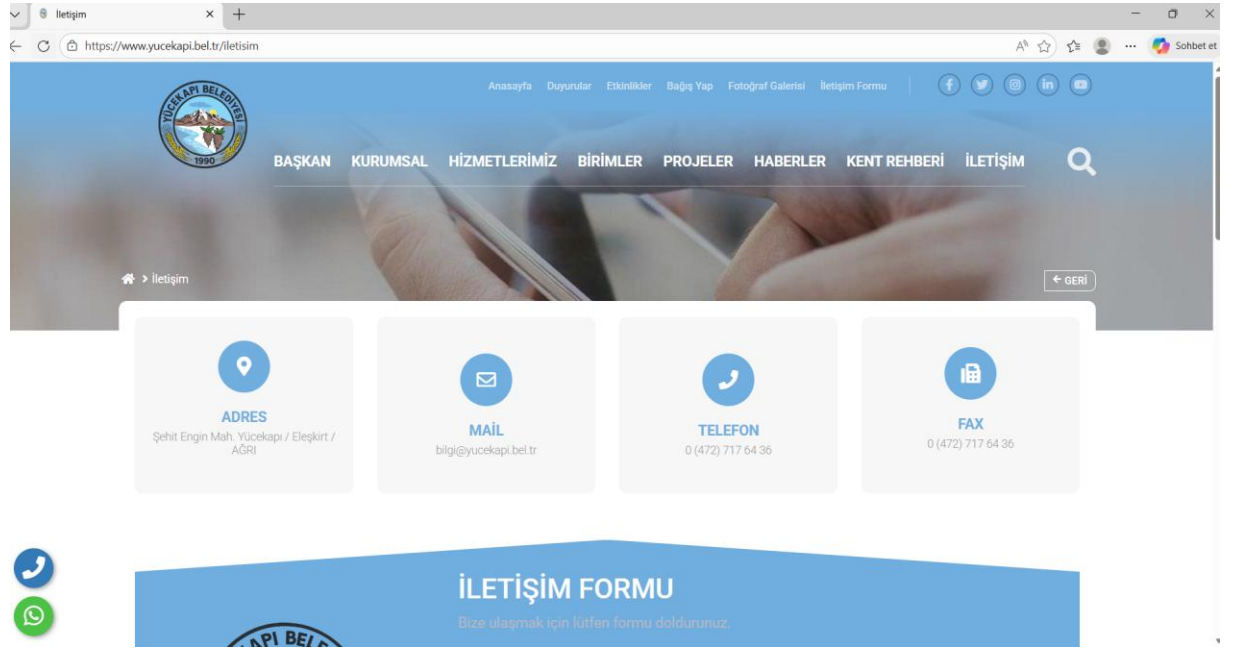


Figure5 , Ağrı Yücekapı Municipality Contact Page

- **Petition / mail:** Written petitions may be delivered in person to Yücekapı Municipality or sent by mail (Şehit Engin Mahallesi Cumhuriyet Caddesi No: 47 YÜCEKAPI BELEDİYESİ ELEŞKİRT/AĞRI).
- **Grievance box:** A grievance box will be placed in the municipal building and at a suitable location (e.g., village office/municipal service point).

1. **Receipt and recording of grievances:** PIU records every grievance received in the Grievance Register/Table on the same day or within one business day at the latest. The record will include the date of submission, submission channel, subject/summary, location (if applicable), the person who received the grievance, the responsible unit/party, planned action, outcome, and closure date.
2. **Acknowledgment of receipt:** The applicant is notified that the grievance has been received and provided with a reference number within 2 business days at the latest (via phone/SMS/email). Since an “acknowledgment of receipt” cannot be issued for anonymous grievances where no contact information was provided, the process and outcomes are documented and tracked.
3. **Initial assessment and classification (assessment period):** PIU evaluates the content and urgency of the grievance, classifies it within 5 business days at the latest, and shares it with the relevant unit/contractor. Grievances are generally categorized as: (i) environmental issues (dust, noise, waste, traffic, etc.), (ii) social/community issues, (iii) employee grievances (which are directed to a separate employee Grievance Mechanism), and (iv) Sexual Exploitation/Abuse and Sexual Harassment (SEA/SH).
4. **Investigation and solution development:** Depending on the nature of the grievance, a site inspection is conducted and/or input is sought from the relevant municipal units regarding the contractor. Corrective/preventive actions are identified, and the responsible party and completion date are defined. This phase is completed within a maximum of 10 business days.
5. **Implementation of the solution, feedback, and closure:** The identified actions are implemented and documented. The complainant is notified of the actions taken and the outcome within 15 business days at the latest. If the complainant accepts the solution, the grievance is closed.
6. **The complainant’s right to appeal and the authorities to which they may appeal:** If the complainant deems the proposed solution insufficient or believes their grievance has not been properly addressed, they may first request a re-evaluation of the grievance and appeal to the municipal administration. If the grievance remains unresolved through these processes or if the complainant chooses to do so, the right to appeal to the relevant administrative and judicial authorities under applicable legislation is reserved. In this context, the complainant may file a grievance with the Alo 153 Municipal Communication Center, CIMER (Presidential Communication Center), and relevant public institutions. Additionally, depending on the nature of the dispute, administrative appeal channels and/or judicial avenues may be utilized.

7. **Timeframes:** For standard grievances, the process (from registration to resolution) will be completed within a maximum of 15 business days. In more complex cases, the timeframe may be extended; in such cases, the applicant will be notified of the reason and the new target date. The maximum timeframe is 30 business days.

**Acceptance of anonymous grievances:** Anonymous grievances are accepted and evaluated under the same procedure. Anonymous grievances may be submitted via the grievance box (without providing a name or contact information), the website/online form (without entering contact information), or by phone without providing identification. Providing contact information is encouraged but not required.

**Special procedure for grievances regarding sexual exploitation and abuse (SEA) and sexual harassment (SH):** Applications related to SEA and SH are handled with a focus on confidentiality and victim safety. Such grievances are immediately (within 24 hours at the latest) referred to the designated contact person identified by PIU; additionally, ILBANK is notified within 24 hours, and records are maintained with restricted access. No personal information is shared without the victim's consent. The complainant is provided with information about available support services (such as health, psychosocial support, legal support, and relevant official grievance channels), and referrals are made upon request. The purpose of SEA/SH grievances is to ensure the victim's safety and facilitate access to appropriate support services.

### 6.3. Grievance Mechanism for Workers

To ensure that all employees to be hired under the Sub-Project (including contractors and subcontractors) can safely communicate workplace-related grievances and concerns, a separate Workers' Grievance Mechanism will be operated, distinct from the stakeholder Grievance Mechanism. The Worker GM is free of charge, and no fees are collected from the complainant. The mechanism is based on the principle of confidentiality, allows for anonymous submissions, and is implemented in a manner that prevents the risk of retaliation or discrimination.

**Submission channels:** Workers may submit grievances through the following channels:

- **Worker grievance box:** A locked grievance box will be placed in a location on the construction site or work area that is easily accessible to employees, visible yet ensures privacy (e.g., near the cafeteria or changing room, or at the entrance to the site office).

The key to the box will be held exclusively by the employee grievance liaison designated by the contractor. The boxes will be opened at least once a week.

- **Worker Grievance Liaison:** The contractor will appoint an “Worker Grievance Liaison” (preferably an OHS specialist or a representative from human resources/site management); employees may submit their grievances to this person in person or by phone.
- **Written petition:** May be submitted in person to site management or the contact person.
- **Email/phone line, if applicable:** The email address and/or phone line designated by the contractor will be communicated to employees.

**Worker notification:** The Worker Grievance Mechanism will be explained to employees upon hiring and during orientation/OHS training. How the mechanism works, the option for anonymous submissions, the prohibition against retaliation, and the timeframes for resolving grievances will be explained verbally. Additionally, a brief informational notice displaying the grievance channels and the contact person will be posted on site bulletin boards (in common areas such as the cafeteria, locker room, and site office). Verbal briefings will also be provided for employees with limited literacy.

#### **Recording:**

1. **Receipt and recording of grievances:** The contractor records every grievance received in the Worker Grievance Log Book/Table on the same day or within 1 business day at the latest.
2. **Record content:** The record includes the date of submission, submission channel, subject/summary of the grievance, workplace/team (if applicable), person who received the submission, responsible person/department, planned action, outcome, and closure date. Records may be maintained using the “Worker Grievance Record Form” and are properly filed.
3. **Confidentiality:** Records are maintained with restricted access. The employee’s identity is not disclosed unless necessary.

#### **Evaluation process and timelines:**

1. **Acknowledgment of receipt:** The complainant is notified that the grievance has been received and provided with a reference number within 2 business days at the latest (in person/by phone/via SMS). Since an acknowledgment of receipt may not be possible for anonymous grievances, the process is tracked through the record.

2. **Initial evaluation:** The grievance is evaluated within 5 business days, and a resolution approach is determined.
3. **Solution and implementation:** A feasible solution is determined, and actions are implemented as soon as possible.
4. **Result notification and closure:** The result is communicated to the complainant within 15 business days at the latest, and the record is closed upon acceptance.
5. **Maximum timeframe:** For standard grievances, the process (from registration to outcome) will be completed within 15 business days at the latest. In more complex cases, the timeframe may be extended; in such cases, the employee is notified of the reason and the new target date. The maximum timeframe is 30 business days.

### **Anonymous submissions:**

Anonymous grievances are accepted. Workers may file a grievance via the grievance box without providing their name or contact information, or contact the designated representative without sharing their identity. Providing contact information is encouraged but not required.

### **Escalation and appeal:**

If an employee finds the resolution insufficient or believes the grievance was not handled appropriately, the grievance is forwarded to the contractor's senior management for re-evaluation. If the employee wishes, they may also submit a grievance to PIU through the stakeholder Grievance Mechanism. Summary information regarding employee grievances (without sharing personal data) is periodically reported to PIU.

### **Special procedure for sexual harassment and similar sensitive grievances:**

Grievances regarding sexual harassment, bullying, discrimination, or similar sensitive issues are handled with a focus on confidentiality and the complainant's safety. Such grievances are immediately (within 24 hours at the latest) referred to the contractor's designated point of contact; records are maintained with restricted access, and personal information is not shared without the complainant's consent. The complainant is provided with information about available support and reporting channels, and is referred as needed. The goal in such grievances is to ensure the complainant's safety and facilitate access to appropriate support processes.

## **7. MONITORING AND REPORTING**

### **7.1. Summary of how the SEP program is monitored and reported**

Monthly summaries of grievances, requests, and related incidents, along with the status of corrective/preventive actions, will be prepared by the Contractor during the construction phase. These summaries will be included in the monthly Environmental and Social Monitoring Reports (ESMR) prepared by the Contractor and submitted to the Yücekapı Municipality Project Implementation Unit (PIU). In addition to summarizing grievances in the monthly ESMRs, the Contractor shall promptly report significant grievances and critical issues (e.g., risks to personal safety, claims of serious environmental/social impacts, allegations of sexual harassment, etc.) to the PIU.

Monthly reports will include the number and nature of grievances (if any), resolution times, the status of closed/open grievances, and the status of corrective/preventive actions taken; they will serve as an evaluation tool to monitor whether the Grievance Mechanism is being operated in a timely and effective manner.

Regarding incidents, the Contractor shall be responsible for immediately reporting to the PIU any environmental, social, or labor-related non-conformities, issues, accidents, and unforeseen circumstances, and for maintaining incident records on-site throughout the construction period. Incident records shall include the date, location, brief description of the incident, emergency measures taken, and corrective and preventive actions implemented or planned.

The Consultant (Construction Supervision Consultant) will prepare a quarterly (3-month) ESMRs based on the monthly E&S Monitoring Reports and grievance/incident records submitted by the Contractor, as well as their own site observations, and submit it to Yücekapı Municipality. Yücekapı Municipality will review these reports and forward them to İLBANK. İLBANK, in turn, will compile the reports received from Yücekapı Municipality; taking into account the monitoring activities conducted by the İLBANK Erzurum Regional Directorate and observations obtained from (if any) site visits, will prepare a six-month (6-month) E&S Progress Reports and submit it to the World Bank. These reports will include a performance summary of the Sub-Project regarding the management of health, safety, environmental, and social issues during the relevant period, the operation of the Grievance Mechanism, and the stakeholder consultation activities conducted under. It is a fundamental principle that personal information of complainants will be kept confidential and will not be shared in these reports.

The effective implementation of the Stakeholder Engagement Plan will be monitored and evaluated at regular intervals. Monitoring will be conducted based on the following key indicators:

- Number and dates of meetings/one-on-one interviews conducted.
- The number of announcements made and the channels used (municipal announcements, village council notices, telephone notifications, etc.).
- The number of grievances received, the number of closed/pending grievances, and the types of grievances.
- Average resolution time for grievances.  
Implementation of access methods for vulnerable groups and recording of feedback received from these groups (participation/feedback presence)

## **7.2. Reporting Back to Stakeholder Groups**

Yücekapı Municipality will provide regular feedback to stakeholders regarding how opinions and feedback received through stakeholder engagement activities are evaluated, what actions are planned/implemented, and general outcomes related to the operation of the Grievance Mechanism. This feedback will be provided to enhance transparency and ensure stakeholders have access to information about the process.

In this context, information for stakeholders will be provided through the following methods:

- Municipal official announcement channels: Announcements and informational notes regarding the Sub-Project will be shared via the municipality's official website and/or other official announcement channels.
- Village council bulletin boards: In particular, in settlements near the Sub-Project site, important updates will be posted on bulletin boards through the village councils.
- Post-meeting/consultation updates: Following the Public Consultation Meeting and/or individual consultations, the main topics discussed and the responses provided will be documented in a brief summary; where appropriate, this information will be shared with stakeholders.
- Grievance Mechanism Feedback: Complainants will be notified via the relevant channels that their grievances have been received and resolved.

Grievance Mechanism records will not be shared publicly in accordance with the principle of personal data protection. Instead, summary information, excluding personal data, regarding the number of grievances, their types, average resolution time, and corrective/preventive

actions taken may be shared periodically through the municipality's public announcement channels.

# ANNEXES

## Annex 1: Sample Grievance Submission Form

Reference No	
Subject	Description
Person/Organization Filing the Grievance <sup>2</sup>	[First Name Last Name/Organization]
Contact Information	[Phone/Email/Address]
Subject of the Grievance	[Noise, dust, traffic, occupational safety and health, other]
Details of the Grievance	[Detailed description of the grievance]
Proposed Solution to the Grievance	[What the complainant proposes to resolve the grievance]
Signature	
Date	

This document has been prepared to support the stakeholder engagement process and management of the sub-project.

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<sup>2</sup> The complainant has the right to remain anonymous. While providing a name and address is not mandatory, it should be noted that certain issues may arise during the feedback process related to the grievance due to a lack of information.



## Annex 2: Sample Grievance Closure Form

This form is used to systematically record, track, and resolve grievances, suggestions, or requests received from stakeholders regarding the Sub-Project.

Reference No	
Subject	Description
Person/Organization Filing the Grievance <sup>3</sup>	[First Name Last Name/Organization]
Contact Information	[Phone/Email/Address]
Date of Grievance	[Day/Month/Year]
Subject of the Grievance	[Noise, dust, traffic, occupational safety and health, other]
Details of the Grievance	[Detailed description of the grievance]
Proposed Solution to the Grievance	[What the complainant suggests to resolve the grievance]
Actions Taken	[To be filled out by PIU]

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<sup>3</sup> The complainant has the right to remain anonymous. While providing a name and address is not mandatory, it should be noted that some issues may arise during the feedback process related to the grievance due to a lack of information.

Feedback Date	[Day/Month/Year]
---------------	------------------

Name and Surname and  
Complainant's Signature

Title, Name, and Signature of the Responsible  
Institution/Company Representative

Date

### **Annex 3: Stakeholder Engagement Participation Form:**

This form is used to record stakeholders who participate in organized information and consultation meetings and to document the participants' views and suggestions.

Meeting Details	Description
Meeting Date and Time	[Day/Month/Year - Time]
Meeting Location	[Address]
Meeting Format	[In-person - Phone - Online Meeting]
Meeting Topic	[Sub-project briefing, Grievance Mechanism, etc.]
Meeting Participants	[First Name, Last Name, Organization, Contact Information]
Notes Taken and Feedback	[Key points raised during the meeting and decisions made]

**Annex 4: Preliminary Meetings with Yücekapı Residents Prior to the SEP  
(October 19, 2025):**



**Figure6 Preliminary meeting held at the Yücekapı Municipality building with the participation of the Mayor and the consulting firm (October 19, 2025)**



Figure7 : Preliminary consultation meeting held at the tea house with the participation of the Mayor and the consulting firm, attended by local residents (October 19, 2025)

**Annex 5: Photos of Preliminary Consultations with Individuals in the Primary area of influence Prior to the SEP (February 13, 2026):**



**Figure8 : Meetings with individuals in the primary area of influence (February 13, 2026)**



Figure9 Interviews with individuals in the primary area of influence (February 13, 2026)



Figure: Interviews conducted with individuals in the primary area of influence (February 13, 2026)

## Annex 6: Schools, Mosques, and Health Centers Located Along the Project Route

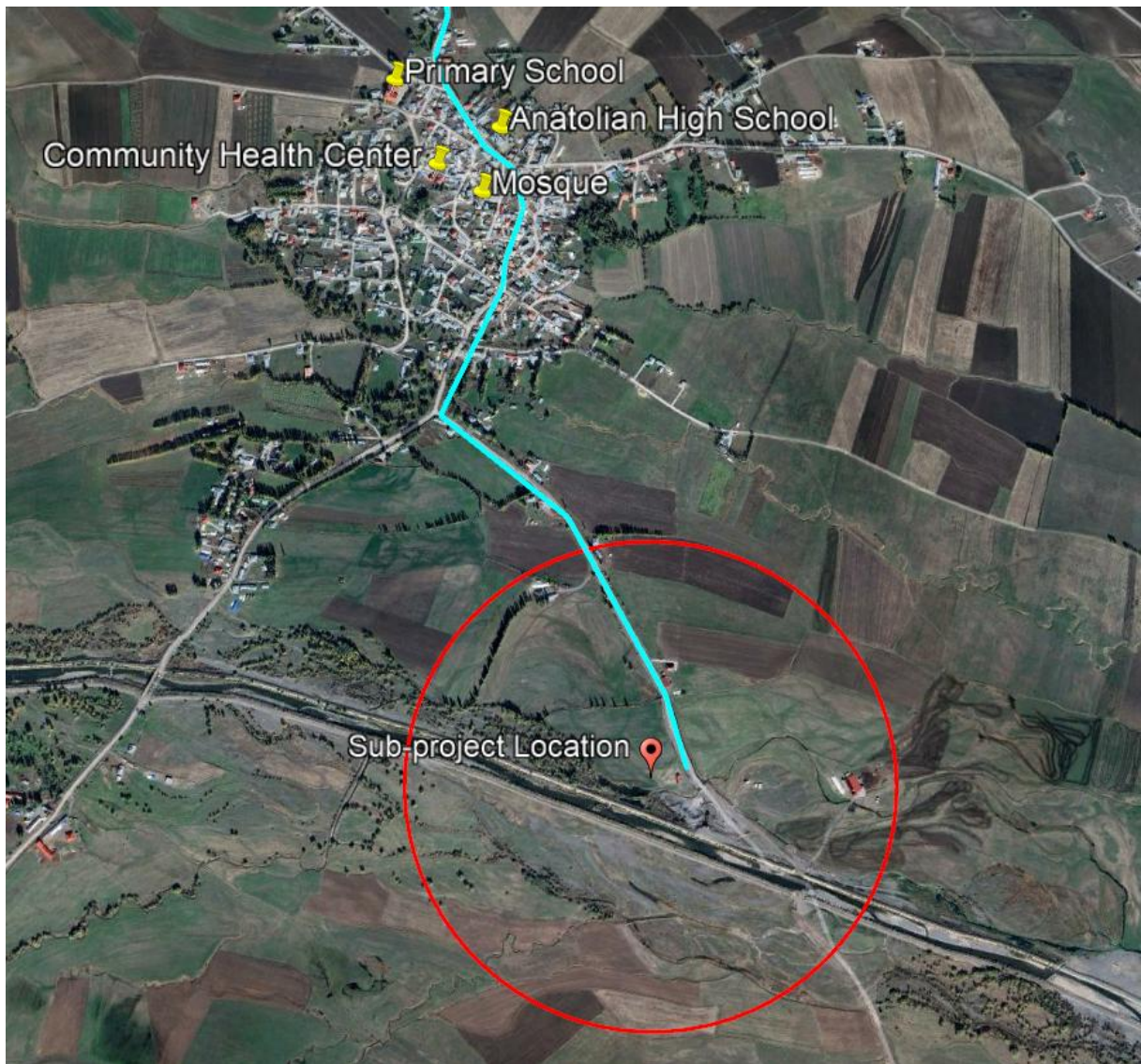


Figure10 : Schools, mosques, and health centers located along the sub-project access route

## Annex 7: Locations of Neighborhood Councils in the Immediate Vicinity

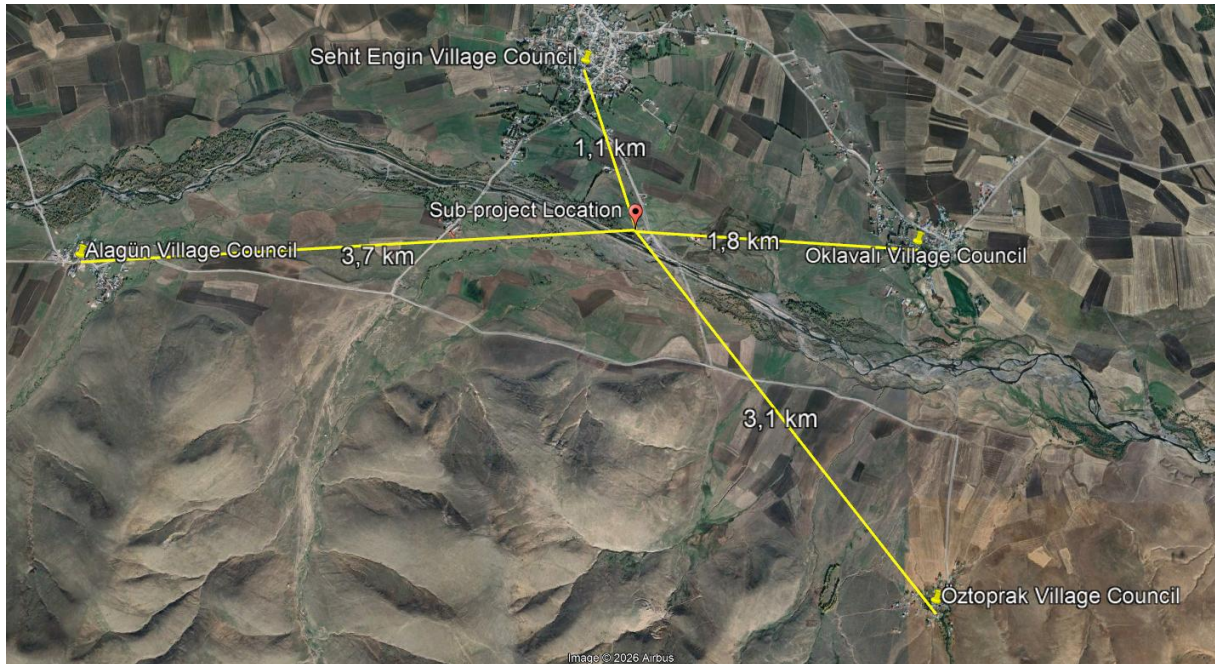


Figure11 : Locations of Village Councils in the Vicinity of the Sub-Project Site and Their Distances from the Sub-Project