

The Black Sea Trade and
Development Bank, BNP Paribas,
Societe Generale, Swiss ECA/SERV

**Istanbul Municipality Waste to
Energy**

Stakeholder Engagement Plan

Final | 26 September 2019

This report takes into account the particular
instructions and requirements of our client.

It is not intended for and should not be relied
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is undertaken to any third party.

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Abbreviations

BSTDB	Black Sea Trade and Development Bank
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
HZI-Makyol	Hitachi Zosen Inova – Makyol İnşaat Sanayi Turizm ve Ticaret A.Ş. Joint Venture
IFC	International Finance Corporation
IMM	Istanbul Metropolitan Municipality
KPI	Key Performance Indicator
MoEU	Ministry of Environment and Urbanization
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
PS	Performance Standards
SEP	Stakeholder Engagement Plan
TOBB	Turkey Union of Chambers and Commodity Exchanges
WtEP	Waste-to-Energy Plant

1 Introduction

The Black Sea Trade and Development Bank (BSTDB), BNP Paribas, Societe Generale, and Swiss ECA, SERV (the Lenders/SERV) are considering providing finance to Istanbul Metropolitan Municipality (IMM) for the construction of a greenfield solid waste incinerator with energy generation capacity (the Project) in Ksirmandira, Eyupsultan District of the Istanbul Province.

The EPC contract for the Project was awarded to Hitachi Zosen İnova – Makyol İnşaat Sanayi Turizm ve Ticaret A.Ş. Joint Venture (“HZI-Makyol” or “the EPC Contractor”).

The Lenders/SERV has commissioned Arup Mühendislik ve Müşavirlik Ltd. Şti. (“Arup” or “the Consultant”) to carry out Environmental and Social Due Diligence (the ESDD) for the Project. This Stakeholder Engagement Plan (SEP) forms part of the package, along with the ESDD, an Environmental and Social Action Plan (ESAP) and a Non-Technical Summary (NTS). The task involves evaluation of the existing national Environmental Impact Assessment (2012) (EIA) against the International Finance Corporation’s (IFC’s) Environmental and Social Sustainability Policy (2012) and its Performance Standards (PSs), as well as applicable national and international requirements, and development of ESAP such that the project is aligned with these standards.

The SEP describes IMM’s strategy for engaging with stakeholders, providing timely information on the Project and it describes the grievance mechanism(s) that will be used throughout the Project lifecycle. This SEP is a living document, which will be revised and updated as necessary during Project implementation and operation.

2 General Description of Activity

Municipal solid waste generated at the district municipalities of the European side of Istanbul will be collected at Silivri, Halkali, Yenibosna, and Baruthane Waste Transfer Stations, and sent to the new Waste to Energy Plant (WtEP). The capacity of the WtEP will be 3,000 tonnes/day, which will produce up to 90 MW of electrical energy. It is planned that the WtEP will work 24 hours daily and 8,000 hours annually. The remaining 760 hours in a year consists of the time required for maintenance and planned/unplanned shutdowns. As of July, construction phase of the project is planned to be completed.

Municipal solid waste delivered to the WtEP will be transported from the abovementioned transfer stations by semitrailers. On daily basis, 352 vehicles are expected to be used in total. These vehicles will use D-010 state road. In addition, 46 trucks will be used for disposal of bottom ash, which will be produced as a result of the incineration process. Figure 1 shows the location of the Project along with nearby settlements and other notable infrastructure.

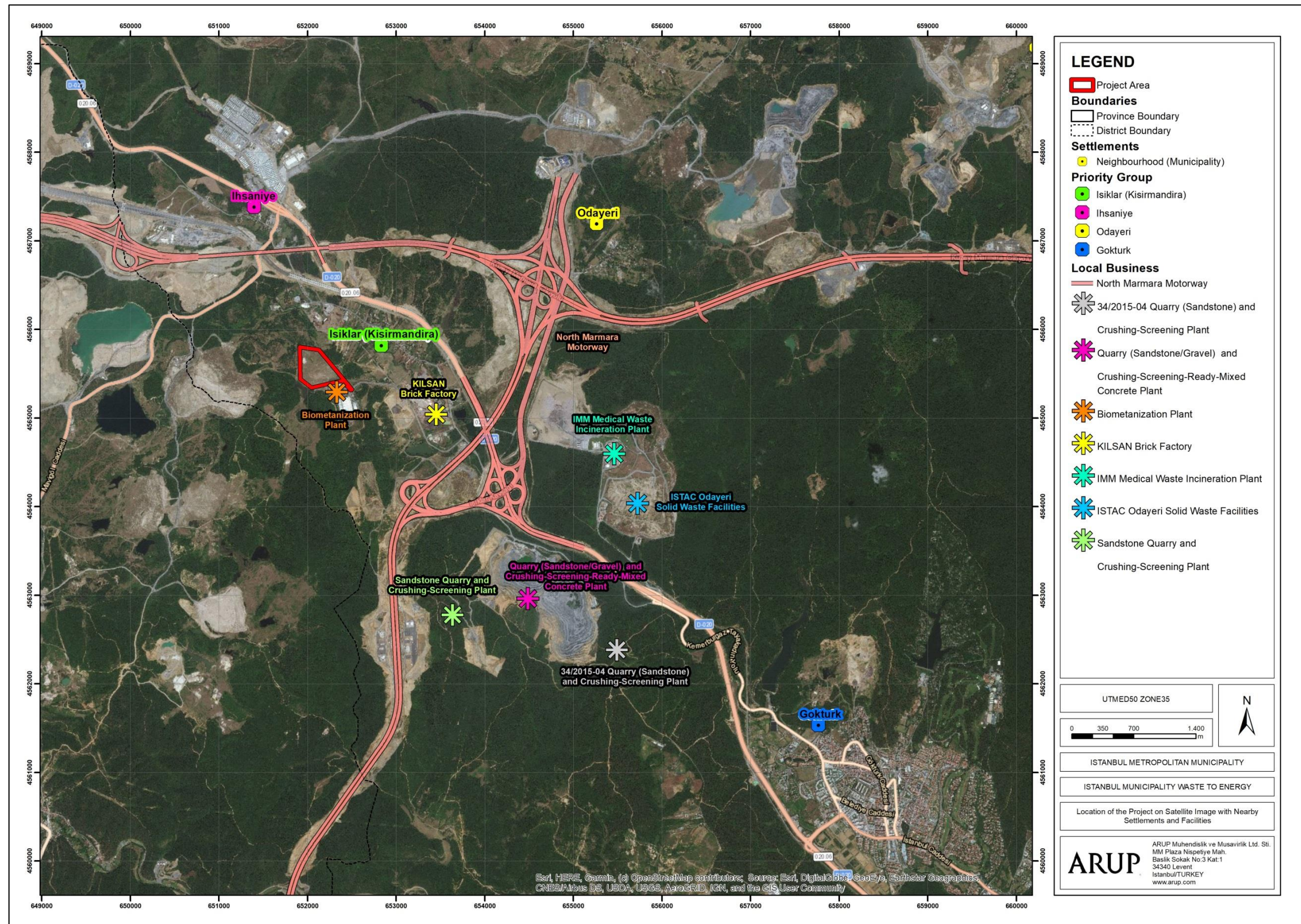


Figure 1. Location of the Project on satellite image with nearby settlements and other notable infrastructure

3 Purpose of this SEP

Stakeholders are persons or organisations who:

- are directly or indirectly affected by a project (or company's operations);
- have "interests" in a project or a company that determine them as stakeholders; and/or
- have the potential to influence project outcomes or company operations.

Stakeholder engagement is a mechanism that enables stakeholders to be involved in the Project development process from the planning stage of the Project through the whole life of the activity.

SEPs are established to make the process controlled, systematic and effective. SEPs make a significant contribution to the Project management strategies by ensuring stakeholders to get involved in the management system of the project in the early stages of the project and providing opportunity to get project related grievances. In this sense, this SEP, which is under the responsibility of IMM, will be updated as the Project progresses. Therefore, this SEP will be a living document.

The primary objectives of this SEP are to define the methods of sharing the right information with the stakeholders in the most appropriate and engaging manner. The SEP sets out the elements and methods that are needed to ensure that this information sharing is fair and clearly defined.

4 Scope

The scope of this SEP can be defined as follows:

- Description of past stakeholder engagement activities,
- Identification and analysis of project stakeholders,
- Identification of the methods in which stakeholders can participate in the Project,
- Identification of tasks/responsibilities for the implementation of the stakeholder engagement program,
- Establishing a grievance and suggestion mechanism,
- Reporting and monitoring.

This SEP is prepared on behalf of IMM in order to meet the requirements of the IFC PS1 - Assessment and Management of Environmental and Social Risks and Impacts, World Bank Group Policy and Standards OP/BP 4.01 Environmental Assessment, World Bank Group's 2010 Policy on Access to Information, and relevant Turkish legislation.

5 Legislation and Lenders' Requirements

5.1 National Requirements

The 1st Clause of the 9th Article of the Turkish Environmental Impact Assessment Regulation No: 29186 dated 25th November 2014, defines stakeholder participation process. In accordance with the related article, it is the legal responsibility of a project owner to organize a Stakeholder Participation Meeting. The date and place are determined in agreement with the Ministry of Environment and Urbanization (MoEU). The aim of the public participation meeting is to inform people who may be potentially affected about the project and to understand their concerns, opinions and suggestions about the project. This process is the only formal requirement for stakeholder participation according to Turkish legislation.

According to the 4th Clause of 9th Article of Turkish Environmental Impact Assessment Regulation, activities such as surveys and meetings may be carried out by the project owner before the Environmental Impact Assessment process. These activities are recommended in addition to the Public Participation Meeting in order to increase public participation.

The Project is on the list of projects defined in Annex-1 of the Regulation (List of Projects to be Applied Environmental Impact Assessment). The EIA report for the Project was finalized on 04.07.2012. The Project was granted with "EIA Positive" certificate of MoEU, No: 2610.

The evaluation of the public participation meeting for the Project is presented in Chapter 6 of this SEP.

5.2 International Standards

5.2.1 IFC Performance Standards

The Project aims to meet applicable international standards. This SEP has been prepared in accordance with the IFC Performance Standards. The following four IFC Performance Standards apply to the project:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions Performance
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community Health, Safety, and Security

Since Performance Standards 5, 6,7and 8 were scoped out of the conducted ESDD of the Project, these standards are not listed above.

Performance Standard 1 establishes the importance of

1. integrated assessment to identify the environmental and social impacts, risks, and opportunities of projects;
2. effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and
3. the client's management of environmental and social performance throughout the life of the project. The objectives of this standard are as follows:
 - Identifying and assessing the social and environmental impacts of the Project Impact Area, whether negative or beneficial;
 - Prevention of adverse effects on workers, affected communities and the environment; or if prevention is not possible, minimize, reduce or compensate that effects
 - Ensuring that affected communities will participate with appropriate problems that are likely to affect them; and
 - Promoting improved environmental and social performance of the companies through effective use of management systems.

To meet these objectives, this SEP has been prepared to guide stakeholder engagement during the construction and operation phases of the project.

5.2.2 Policy and Standards of World Bank Group

World Bank Group Policies and Standards must also be followed. The World Bank Environmental and Social Safeguard Policies include environmental assessments of projects and other policies regarding environmental and social adverse impacts, and mitigation and prevention. Specific policies relevant to the Project are listed below:

- Environmental and Social Policies
 - OP/BP 4.01 Environmental Assessment
- 2010 Policy on Access to Information

The main objectives and tasks of the World Bank Environmental and Social Safeguard Policies related to the project are as follows:

- OP/BP 4.01 Environmental Assessment:
 - Ensuring environmental and social sustainability of proposed projects
 - Informing decision-makers about environmental and social risks
 - To increase transparency through stakeholder participation in decision-making.

- 2010 Policy on Access to Information
 - The World Bank's 2010 Policy on Access to Information establishes that as a development institution, the Bank strives to be transparent about its projects and programs (particularly with groups affected by its operations), to share its global knowledge and lessons of experience with the widest possible audience, and to enhance the quality of its operations by engaging with a broad range of stakeholders.

6 Stakeholder Engagement Activities

As mentioned in Chapter 5.1 of this SEP, it is the legal responsibility of the project owner to organize a Stakeholder Participation Meeting if the project is in the list of projects defined in Annex-1 of the Regulation. The required meeting for the Project was held on 20.12.2011 at the meeting hall of IMM's Composting and Recycle Facility. The meeting was announced through local and national newspapers and through the local headmen of the villages nearby such as Ihsaniye, Isiklar and Odayeri. The meeting was held under the chairmanship of T.R. Istanbul Governorship Provincial Directorate of Environment and Urbanization.

A summary of the public participation meeting taken from the EIA report for the Project is given below:

“At the meeting; information about the project is given and examples of the same type of energy production facilities operating in different countries are presented. The reasons why wastes will be incinerated of by technology and the advantages of this system are mentioned. The local community attended to the meeting mentioned that whether odor problem in the existing facility will also be continued in the planned facility or not; whether there will be environmental pollution from wastewater or not; whether air pollution is experienced or not. In addition, the local community expressed their expectation from the IMM for the improvement of their poor roads.”

Since the public participation meeting, within years, additional meetings were held with the local community (particularly dwellers of Ihsaniye and Isiklar) by IMM, though formal records of the meetings were not kept. According to IMM representatives, there were no major comments and concerns regarding the Project but job opportunities for youth in the villages.

Arup and IMM representatives participated in a field study on 29 May 2019. During this field study, a meeting was held with the muhtars of Isiklar and Ihsaniye villages and representatives of the nearby Kilsan Brick Factory. Photographs of the meetings are presented in Figure 2 and Figure 3. During these meetings, information was given about the Project and comments were heard. The comments are summarised as follows:

- Concerns over traffic due to a number of infrastructure projects in the vicinity of the Project area,
- Concerns regarding dust due to quarries in operation in the vicinity of the Project area,
- Odour complaints from the existing composting plant adjacent to the Project site,
- Employment expectations of the local community.



Figure 2. Interview with the muhtars of Ihsaniye and Isiklar neighbourhoods



Figure 3. Interview with the representative of Kilsan Brick Factory

7 Stakeholder Identification

One of the main objectives of this SEP is to identify the groups or institutions/ organizations that may be affected by the Project. The priorities or sensitivity of the people or groups that may be affected have been ranked. The aim of this is to eliminate impacts according to the degree of exposure of the people or groups that may be affected by the Project, thus leading towards a fair outcome.

As already mentioned this SEP is a living document and will be updated and revised as necessary, including the list of project stakeholders. Organizations or groups that are not on the list but who wish to have information about the Project will be able to contact IMM and have their contact information added to the list. Table 1 shows the stakeholder engagement list currently defined for the Project.

Table 1. Stakeholder list for the Project

Level	Category	Organization/Enterprise	Main Goals and Interests
Project Area	The EPC Contractor	HZI-Makyol and its employees	Financial, technical, and compliance considerations of the Project; Sustainable growth of the companies; Safe and healthy working conditions for workers; Environmental, health and safety considerations.
	Subcontractors	Direct and indirect subcontractors and their employees	
	WtEP	All employees of WtEP	
International	Lenders/SERV	Black Sea Trade and Development Bank	Financial, technical, and compliance considerations; Environmental, health, and safety conditions of workers and impacts during construction and operation; Working conditions; Public health; Information disclosure.
		BNP Paribas	
		Societe Generale	
		Swiss Export Risk Insurance	
National	National Government Organizations	T.R. Ministry of Environment and Urbanization	Financial, regulatory and compliance considerations.
		T.R. Ministry of Forestry and Water Affairs	
		T.R. Ministry of Energy and Natural Resources	
		T.R. Ministry of Labor and Social Security	
		General Directorate of Environmental Management	
		Energy Market Regulatory Authority	
		Istanbul Regional Directorate of Forestry	
	Non-Governmental Organizations (NGOs)	Turkey Union of Chambers and Commodity Exchanges (TOBB)	Improved public health, environmental and social considerations (including livelihood impacts).
		UCTEA Chamber of Electrical Engineers	

Level	Category	Organization/Enterprise	Main Goals and Interests
		UCTEA Chamber of Environmental Engineers	
		Environment Foundation of Turkey	
		Environment Protection Foundation of Turkey	
		WWF Turkey	
		Nature Association	
		Environmental Protection and Packaging Waste Recovery and Recycling Foundation	
		Electricity Producers Association	
		Turkish Energy Foundation	
		Turkish Association for Energy Economics	
Local	Governmental Office	Governorship of Istanbul	Financial, regulatory and compliance considerations.
		District Governorship of Eyupsultan	
		T. R. Istanbul Governorship Provincial Directorate of Environment and Urbanization	
	Local Authorities	T.R. Istanbul Metropolitan Municipality	Improved waste management system; Financial, regulatory and compliance considerations.
		T.R. Eyupsultan Municipality	
	Residents (Priority Group)	Isıklar Neighborhood	Access during construction of WtEP; Environmental, health and safety impacts during the construction and operation of the plant (e.g. noise and vibration, pollution); Safe operation of the new WtEP.
		Ihsaniye Neighborhood	
		Odayeri Neighborhood	
		Gokturk Neighborhood	
	NGOs	All Waste and Environmental Management Association (Tüm Atık ve Çevre Yönetim Derneği)	Improved public health, environmental and social considerations (including livelihood impacts).
Istanbul Province Environmental Protection Foundation			

Level	Category	Organization/Enterprise	Main Goals and Interests
		Marmara Environment Platform	Maintenance of business and income at the current level; Potential suppliers and contractors for the new landfill construction; Environmental, health and safety impacts. Operation of the WtEP.
		Istanbul Environmental Volunteers Platform(SOS)	
		Istanbul Environment Council Federation	
	Local Businesses	North Marmara Motorway	
		No.34/2015-04, Quarry(Sandstone) And Crushing-Screening Plant	
		Quarry(Sandstone/Gravel) and Crushing-Screening-Ready Mixed Concrete Plant	
		Quarry(Sandstone) and Crushing-Screening Plant	
		Biomethanization Plant	
		KİLSAN Brick Factory	
		IMM Medical Waste Incineration Plant	
ISTAC Odayeri Solid Waste Facilities			

People living in residents near the Project area are defined as a “priority group” in this SEP. There are four settlements near the Project area that are in this group. Persons with disabilities, women, children and persons/families whose income level is at or below the hunger threshold are specifically identified as a sensitive group. Therefore, the participation, information and, if appropriate, compensation of these people is among the objectives of the SEP.

8 Stakeholder Engagement Plan

IMM will develop various communication methods in order to receive feedback regarding the Project. One task of this SEP is to define these means of communication. The first of these steps will be the sharing of soft and hard copies of the SEP with the public via the IMM's and operator's website, muhtar offices, and local teahouses. The SEP will be disclosed in both Turkish and English. The desktop, field studies and interviews made with the local headmen showed that there are no large ethnic communities in the vicinity of the Project Area, such as Kurdish, Syrian, etc. Where large ethnic communities will be present in the future, the SEP will be provided in alternative languages. In addition, muhtars will be informed about the SEP, engagement activities/methods and grievance mechanism developed as a scope of this SEP. Changes to the Stakeholder Engagement Plan will be shared with the public and the document will be periodically updated (or at least once prior to operation).

Typical methods for stakeholder engagement are as follows:

- Correspondence with Legal Authorities
- IMM website (<https://atikyonetimi.ibb.istanbul/atik-yakma-ve-enerji-uretim-tesisi/>) (in Turkish)
- Ordinary and emergency meetings
- Grievance and suggestion mechanism
- Phone calls
- Announcements with visual, auditory and printed media
- Project brochures

Table 2 shows the type of information to be shared with each stakeholder group and specific communication methods to be used for stakeholder engagement.

Implementation of the SEP by IMM will be the responsibility of a person from the IMM Public Relations Unit or a specifically appointed person/person with the qualifications to perform the task. IMM has the ultimate responsibility for delivering this SEP. During construction phase and first year of the operation, the EPC Contractor, will support IMM in implementation of this SEP by informing IMM about the Project development and implementation and maintaining up-to-date and accessible information about:

- Key Project stages and programmes (e.g. issuance of permits, commencement of construction or operation, construction programme, etc.);
- Any Project-related disruptions (e.g. road closures, access or infrastructure disruptions);
- Key consultations/meetings resulting in project changes of affecting public and local community; and

- Environmental, health, and safety performance (e.g. information about incidents, monitoring results)

Thereafter, IMM will assume contractor's responsibilities in implementing the SEP.

Table 2. Stakeholder Engagement Programme

Activity	Responsibility	Outcome/Communication tool	Timing
Appoint a Community Liaison Officer (CLO) to be responsible for the stakeholder engagement for the project, implementation of this SEP and grievance management.	IMM, the EPC Contractor, Operator	CLO job description is prepared and available CLO details are widely available at project location and websites.	2019 Q4
Notify stakeholders and disclose full Project information package (2012 EIA, ESDD, NTS, SEP, ESAP).	IMM, Operator	IMM and Operator websites, Information boards at local headmen offices and WtEP site Project information will be disclosed in English and Turkish.	2019 Q4
Keep stakeholders informed about Project development and implementation. Maintain up-to-date and accessible information about: 1. Key Project stages and programmes (e.g. issuance of permits, commencement of construction or operation, construction programme, etc.); 2. Any Project-related disruptions (e.g. road closures, access or infrastructure disruptions); 3. Key consultations/meetings resulting in project changes or affecting public and local community; 4. Environmental, health and safety performance (e.g. information about incidents).	CLO/IMM, CLO/the EPC Contractor, CLO/Operator	IMM website, Press releases, radio or TV announcements, Local notices, Minutes of key meetings. Information board at local headmen offices and WtEP site.	On-going Project website should function throughout the Project lifetime.
Regularly review and update SEP/ Stakeholder engagement activities. Maintain and review the project grievance mechanism. Assess (i) whether the type of consultation and disclosure activities are appropriate for the different stakeholder groups; (ii) the frequency of consultation activities is	CLO/IMM, CLO/the EPC Contractor, CLO/Operator	Project / City Administration website, Physical locations to be confirmed.	Review/update at least bi-annually during construction. Review/update annually during operation.

Activity	Responsibility	Outcome/Communication tool	Timing
sufficient; (iii) grievances have been adequately dealt with; (iv) the stakeholder list remains appropriate; and (v) whether engagement should cease or be extended to any stakeholders.			

9 Grievance Mechanism

9.1 Purpose of Grievance Mechanism

Grievance/suggestions mechanisms developed by IMM, the operator, and the EPC Contractor can record the wishes and complaints of the Project stakeholders (especially residents of the region or NGOs). Recording grievances is important in terms of checking whether a problem has been resolved or whether it cannot be resolved. If it cannot be resolved, it is important to identify the reasons for this. In this sense, the mechanism can be regarded as fair and transparent communication. It is the responsibility of IMM to ensure that the grievance mechanism is not used against a complaining person/group.

The recording of opinions, suggestions or grievances as written documents is also important to define the limits of the grievance issue for both IMM and stakeholders. Thus, the scope of the mechanism is defined.

The biggest benefit of the grievance or suggestion mechanism for IMM, which is the project owner, is that solutions can be developed without the intensification of problems. At the same time, keeping records of grievances or problems provides quick response to grievances and ensures making predictions for how much time is needed to respond related grievances. Another important contribution of the mechanism is that it allows the recording of the grievances being resolved in a fair, understandable and reliable manner.

9.2 Grievance Procedure and Responsibilities

The grievance/suggestion mechanism will apply during the construction and operation phases of the Project. An appropriately qualified person will be responsible for implementing the mechanism.

Information about the grievance procedure will be provided on notice boards, in local headmen offices given in stakeholder list for the Project and on the IMM and operator website.

Grievances/suggestions may be received via the following:

- Notification of grievances by telephone,
- The project owner receives grievances via the IMM website (with “Grievance Form” and the e-mail address provided in Annex-2),
- Receipt of a completed Grievance Form (see Annex-2) by mail or hand delivery,
- Receipt of grievances at meetings.

An example Grievance Form is provided in Annex-1. Measures taken to resolve the grievance can be recorded and the satisfaction of the complainant is gathered on the same form. Finally, it is recorded whether the complaint is closed along with the date.

All grievances shall be accepted and acknowledged. After a grievance is received, all reasonable efforts will be shown to investigate and handle the grievance. Each grievance will be identified with a new tracking number. The deadline for resolving the grievance is fifteen days. After this period, IMM will contact the complainant within 2 days to discuss solutions. If the complainant is not satisfied with the proposed solution, new solutions will be proposed until both IMM and the complainant are satisfied. In cases where agreement is not possible, the complainant can seek recourse through legal avenues. At that point, the grievance can be recorded as closed on the form.

If problems cannot be dealt with immediate corrective action, appropriate, long-term action(s) will be identified.

If complainants request that their names are not included on the registration form, this request will be fulfilled. However, if a complainant does not share contact information, follow up cannot take place.

All grievances related to Project activities will be recorded throughout the Project cycle and grievances will be monitored by the Project-specific monitoring program.

9.3 SEP Events, Monitoring and Reporting

The outcomes of stakeholder engagement conducted as part of the information disclosure and consultation will be documented and disclosed by the EPC Contractor, IMM and the operator.

The EPC Contractor, IMM and the operator will further monitor the engagement with stakeholders by developing a set of Key Performance Indicators (KPIs) which will cover the following:

- SEP is up to date and Project information is available for the public to comment;
- All planned actions listed in the Stakeholder Engagement and Information Disclosure Programme of the SEP are implemented as scheduled;
- The minutes of consultation meetings are recorded and meetings logged in a register;
- Grievances are logged and tracked through to resolution within a timeframe of 15 days from receipt (evidenced by an up-to-date grievance register);
- Contractors' and subcontractors' contracts include clauses obliging them to adopt SEP requirements, as appropriate;
- Annual reports on the implementation of the SEP and grievance process are made available as part of annual external reporting on the E&S performance of the Project which shall be made publicly available.

Through these KPIs, the EPC Contractor, IMM and the operator will be able to monitor the engagement of stakeholders and update the SEP if necessary.

Public documents will be distributed widely to stakeholders including local communities.

CLOs will be responsible for the implementation and monitoring of this SEP and will perform the following functions:

- Information disclosure and obtaining feedback;
- Processing, managing and tracking grievances, including ensuring timely responses to and closure of grievances;
- Control over the implementation of the corrective actions to remedy grievances;
- Regular review and if necessary, update of the SEP and stakeholder engagement mechanism to ensure it is effective and reflects Project circumstances;
- Participation in discussion on responses and the resolution of disputes;
- Assistance in the preparation of the Annual Environmental and Social Performance Report.

Depending on the complexity of issues, senior project management may also be involved.

Annual reports will be prepared within one week of the review taking place and will be published on the IMM's and the Operator's websites.

10 Contact Information

The contact information of the CLOs of the EPC Contractor, IMM, and the operator are given below.

Address :

Phone Number :

Fax Number :

E-mail :

Website :

ANNEXES

A1 GRIEVANCE/SUGGESTIONS REGISTRATION FORM

A2 GRIEVANCE/SUGGESTIONS FORM

GRIEVANCE/SUGGESTIONS FORM

Istanbul Waste-to-Energy Plant Project: Grievance Form	
Reference No:	
Full Name *	
Contact Information *	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	
Confidential Yes / No	
Grievance lodged (please underline as appropriate): in person, by phone, at community meeting, by mail, by email, other (please describe)	
Description of Inquiry, Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Inquiry/Incident/Grievance	
	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)

What would you like to see happen to resolve the problem?

Signature: _____ Date: _____

Please return this form to: [To Be Confirmed: Name, Position, Address, Telephone, e-mail]

We will register your complaint and respond to you within 15 days, the latest.

* Optional – if a grievance is recorded as anonymous, no reply will be provided.