

TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP)

**10,92 MWp / 9,9 MWe Solar (Photovoltaic) Power Plant
Project of Sultangazi Municipality**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

November, 2025

Sub-Project Information	
Sub-Project	Details
Name	Türkiye Public and Municipal Renewable Energy Project (PUMREP) 10,92 MWp / 9,9 MWe Solar (Photovoltaic) Power Plant Project of Sultangazi Municipality Stakeholder Engagement Plan (SEP)
Project Owner/ Sub-borrower	Sultangazi Municipality
Financial Intermediary	İller Bankası A.Ş (İLBANK)
Prepared by	Ardea Energy Technologies Co.

REVISION HISTORY

Version No	Version	Date of Issue	Prepared by	Submitted to
01	Initial Draft	5 August 2025	Ardea Project & Consulting	ILBANK
02	Draft	02 October 2025	Ardea Project & Consulting	ILBANK

TABLE OF CONTENTS

TABLE OF CONTENTS	iv
LIST OF TABLES.....	vi
LIST OF FIGURES	vi
EXECUTIVE SUMMARY	2
1. INTRODUCTION/PROJECT DESCRIPTION	4
1.1. Objectives.....	4
1.2. Components	6
1.3. Location.....	7
1.4. Sub-project Impact Area.....	9
2. OBJECTIVE/ DESCRIPTION OF SEP	13
3. STAKEHOLDER IDENTIFICATION AND ANALYSIS	15
3.1. Methodology	15
3.2. Affected parties	16
3.3. Disadvantaged/ vulnerable individuals or groups	18
3.4. Other Interested Parties	19
4. STAKEHOLDER ENGAGEMENT PROGRAM	22
4.1. Summary of stakeholder engagement done during project preparation	22
4.1.1. Previous Stakeholder Engagement during EIA Process	22
4.1.2. Stakeholder Engagement During the ESMP Preparation Process.....	23
4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement.....	25
4.2.1. Public/community meetings	25
4.2.2. Media communication	26
4.2.3. Communication materials	26
4.2.4. Project tours for media, local representatives	27
4.2.5. Information desks.....	27
4.2.6. Proposed strategy to incorporate the view of vulnerable groups	27
4.2.7. Information disclosure	27
4.3. Stakeholder engagement plan.....	28
5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES	33
5.1. Resources	33
5.2. Management and Functions and Responsibilities	33
6. GRIEVANCE MECHANISM.....	35
6.1. Grievance Mechanism at National Level	35
6.2. Project Level Grievance Mechanism	37
6.3. Grievance Mechanism for Workers	42
7. MONITORING AND REPORTING.....	44
7.1. Summary of how SEP implementation will be monitored and reported	44

7.1. Reporting back to stakeholder groups	45
ANNEXES	47
Annex A- Site Photographs	48
Annex B- Photographs of Illegal Users in the Parcel	51
Annex C- Site Visit and Community Level Questionnaire Photographs	53
Annex D- Letter of Sultangazi Municipality Regarding the Structures Remaining in the Project Parcel	54
Annex E- Sample Grievance Submission Form	56
Annex F- Sample Grievance Closure Form	58
Annex G Sample Grievance Log Form	59

LIST OF TABLES

Table 1.Vulnerable Groups in the Social Impact Area	19
Table 2.Stakeholder Groups	20
Table 3. Stakeholder Engagement Plan	29
Table 4.Roles and Responsibilities of Key Actors/Stakeholders in SEP Implementation	33
Table 5.Contact Details of Sultangazi Municipality	37
Table 6. Grievance Mechanism Flow Chart.....	39
Table 7.Reporting Process Requirements and Distribution of Roles	45

LIST OF FIGURES

Figure 1.Map of Subproject Location	8
Figure 2. Influence Area of the Sub-Project.....	11
Figure 3.Nearest Settlements.....	17
Figure 4. Water Bodies Near the Subproject Area	18
Figure 5.Organization Structure – Project Implementation Unit (PIU) Hata! Yer işareti tanımlanmamış.	
Figure 6.Screenshot from Sultangazi Municipality Website for Receiving Grievances.....	37

ABBREVIATIONS

AoI	Area of Influence
CIMER	Presidential Communication Center
CSR	Corporate Social Responsibility
EIA	Environmental Impact Assessment
EHS	Environment Health and Safety
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESMR	Environmental and Social Monitoring Report
ESS	Environmental and Social Standards
ETL	Energy Transmission Line
Firat EDAŞ	Firat Electricity Distribution Inc.
GBV	Gender Based Violence
GDNP	General Directorate of National Property
GM	Grievance Mechanism
HS	Health and Safety
IFC	International Finance Corporation
IFIs	International Financial Institutions
ILBANK	İller Bankası A.Ş.
LMP	Labor Management Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organizations
OIP	Other Interested People
PAP	Project Affected People
PIU	Project Implementation Unit
RE	Renewable Energy
Project	The Public and Municipal Renewable Energy Project (PUMREP)
PUMREP	Public and Municipal Renewable Energy Project
SEA/SH	Sexual exploitation and abuse/sexual harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
TEİAŞ	Turkish Electricity Transmission Corporation
WB	World Bank
WBG	World Bank Group
YIMER	Foreigners Communication Center

EXECUTIVE SUMMARY

The Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the “Project”) aims to support the Government of Türkiye to scale-up Renewable Energy (RE) use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country’s climate mitigation commitment and enhance energy security.

The PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities’ energy bills.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S policies and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and sub-projects financed through International Financial Institutions (IFIs).

The ESMS is aimed at ensuring systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S) risks and impacts of the projects and sub-projects financed by the International Finance Institutions (IFIs). This process will be implemented on an ongoing basis throughout their loan duration in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending IFIs (World Bank for the PUMREP). As a critical element of the ESMS, ILBANK has adopted and published an E&S Policy applicable to all ILBANK projects and sub-projects financed through IFIs.

The subproject to be financed under PUMREP includes the installation of a renewable energy facility with an installed capacity of 10,92 MWp / 9,9 MWe and expected to generate 18,492,402 kWh of electricity annually by Sultangazi Municipality. During the construction phase, a total of 73 workers (including contractors and subcontractors) will work on site during the peak period and no campsite will be set up on site for these workers; prefabricated or

temporary facilities will be used for temporary accommodation. During the operation phase, 6 workers (6 out of 2 people are security guards) will work on site during the peak period and there will be no permanent accommodation for these workers; they will come from outside and work when necessary. Moreover, the plant will meet the energy of more than 4,117 households with 18,492,402 kWh of electrical energy production, save the municipality more than 13.06 million EU in energy costs within 30 years and prevent the release of more than 1,048 tons of CO₂ per year into the atmosphere. The project is listed in Annex I of the latest EIA Regulation (prior to the amendment RG-26/6/2025-32938) and is therefore subject to the full EIA process, for which an EIA Positive Decision was received in August 2025. The subproject site is located in the district of Battalgazi and the Yaygın Neighborhood, which is a part of Malatya province in Türkiye. The sub-project is implemented by Sultangazi Municipality, which is located in İstanbul. However, the subproject site is located in Malatya Province, Battalgazi District, Yaygın Neighborhood. The site was allocated to the Sultangazi Municipality through an official arrangement in order to support renewable energy investments under the Public and Municipal Renewable Energy Project (PUMREP). The location was selected based on land availability, technical suitability for solar energy generation, and the absence of land acquisition or resettlement requirements. This ensures compliance with national regulations and the World Bank's Environmental and Social Framework while supporting Türkiye's renewable energy targets. The solar power plant project is a part of Türkiye's ambitious plan to increase the share of renewable energy sources in the country's energy mix. The subproject area is located on 30 hectares of land allocated by the National Real Estate to the Sultangazi Municipality. The solar panels used in the project are of high quality and have a lifespan of 30 years. Sultangazi Municipality will manage all works related to the construction and operation of the sub-project, ensuring effective implementation and operation of the renewable energy facility under the PUMREP.

This SEP has been formulated to ensure that sub-project affected interested parties and vulnerable groups that constitute the stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-project and its impacts.

SEP establishes a systematic approach to stakeholder engagement that will help Sultangazi Municipality to identify all stakeholders and how they will be affected by the Sub-project and ensure that the Sub-project is implemented in a participatory and community-friendly manner

through building and maintaining a continuous constructive relationship with them, in particular with project-affected parties.

SEP also assesses the level of stakeholder interest and support for the Sub-project and guides the relations of the Sultangazi Municipality team with the stakeholders throughout the construction and operation process, enabling stakeholders' views to be taken into account in Sub-project design and environmental and social performance. In line with the World Bank's Environmental and Social Standard 10 (ESS10), this administrative arrangement and its implications for stakeholder engagement are explicitly considered. Since the implementing institution is located in Istanbul, while the Sub-project area is in Malatya, specific measures are planned to ensure effective communication with local stakeholders and accessibility to the project's grievance mechanism. These measures include regular site visits, public information meetings in Malatya, cooperation with local mukhtars, and provision of easily accessible grievance channels (such as telephone, email, or complaint boxes). Through these arrangements, meaningful consultation and effective participation of Malatya's local stakeholders will be ensured throughout project implementation.

SEP is designed to ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1.Objectives

PUMREP aims to support the Government of Türkiye to scale-up RE use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security. Sultangazi Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP. Therefore, this plan is prepared to define the stakeholder engagement process including the grievance mechanism management.

The PUMREP is financed by World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public

facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

The sub-project has been classified as having a moderate level of risk according to the E&S Risk Screening conducted by ILBANK in line with the ILBANK ESMS. One of the tasks under the scope of the Sub-project is the preparation of an Environmental and Social Management Plan (ESMP) and SEP in accordance with ILBANK's ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

Sultangazi Municipality is responsible for stakeholder engagement activities and grievance mechanism, ensuring that the sub-project is carried out in an inclusive and participatory manner. The contractor, selected through a competitive bidding process, is responsible for the construction, logistics, design, test and commissioning, and provisional acceptance of the solar plant.

This Stakeholder Engagement Plan (SEP) of Sultangazi Municipality is an action plan which was prepared for the Sultangazi Municipality 10,92 MWp / 9,9 MWe Solar (Photovoltaic) SPP sub-project and sets out methods for effective communication and interaction with stakeholders.

The ultimate purpose of this SEP is to establish and maintain constructive dialogue between sub-project owner which is Sultangazi Municipality and Project Affected People (PAP), Other Interested Parties (OIP) and vulnerable groups that are essential for the successful management of the environmental and social impacts of the Sub-project. Sultangazi Municipality is fully committed to undertaking necessary engagement activities related to sub-projects in a manner that is consistent with good international practice as outlined in the next sections.

The SEP provides a roadmap for the Sultangazi Municipality's engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to environmental and social assessments, by identifying the stakeholders' concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

1.2.Components

Within the scope of this Sub-project, a Solar Power Plant (SPP) with an installed capacity of approximately 11.00 MWp will be established in Yaygın Neighborhood, Battalgazi District, Malatya Province, on parcel 117 block 1, which has been preliminarily allocated by the Treasury to the Sultangazi Municipality. The plant will use Topcon N-type Monoperc half-cell photovoltaic panels.

To transmit the electricity generated, an underground energy transmission line (ETL) approximately 700 meters long will be constructed using 3x150mm² AL XLPE cables. The line will directly connect the solar power plant to the local substation, ensuring secure and efficient power transmission.

Within the subproject parcel, a Distribution Center (DM) building will be constructed. From this DM, a new connection will extend via underground cable to another DM to be constructed on parcel 121, block 1 (classified as forest land). Through this arrangement, direct integration with the national grid will be achieved. The ETL route passes through parts of parcel 121, block 1, and the necessary official permit has been obtained.

The ETL will enter and exit the Distribution Center underground from the Energy Transmission Line poles. Installation will include precise excavation, underground cable laying, and subsequent connection and testing, ensuring seamless integration with the substation and reliable electricity transmission from the solar plant to the national grid.

Figure 1. Maps of ETL Route

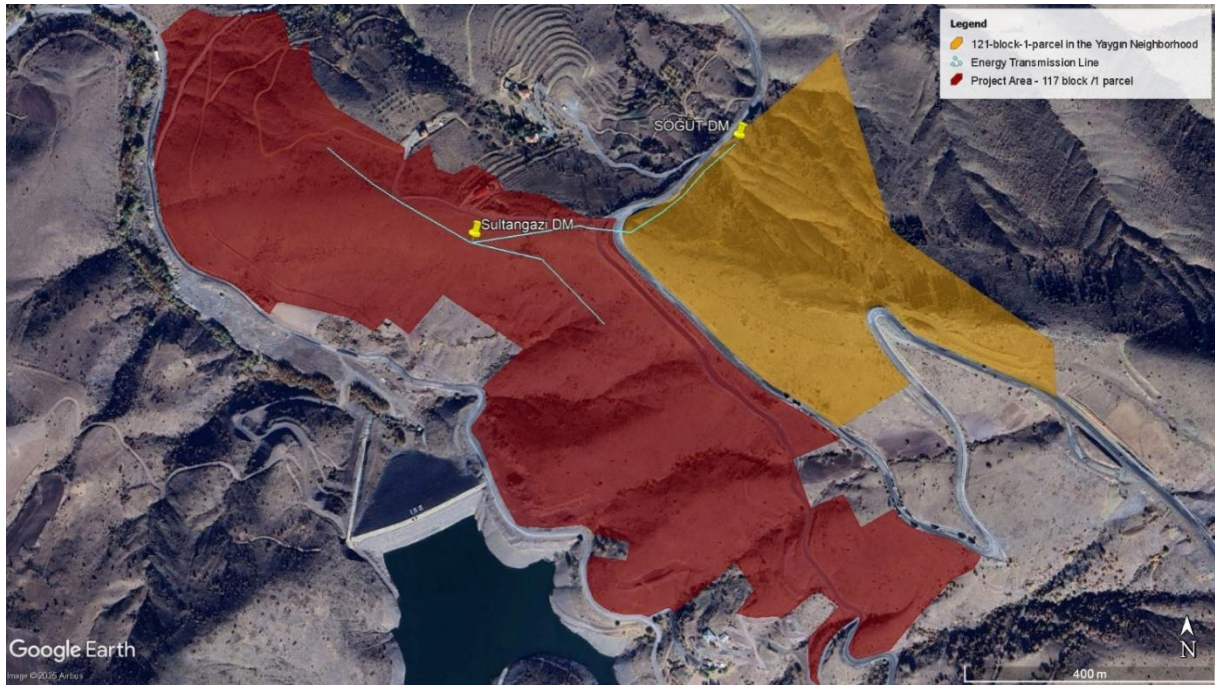
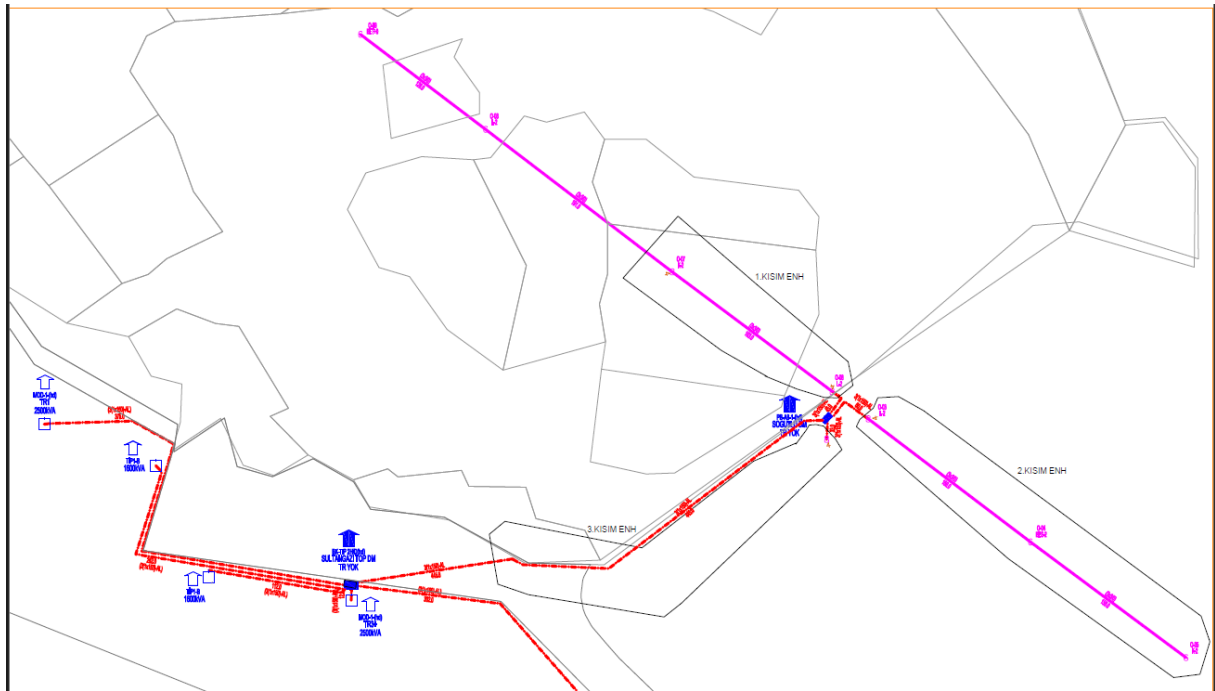


Figure 2: General Layout of ETL Route

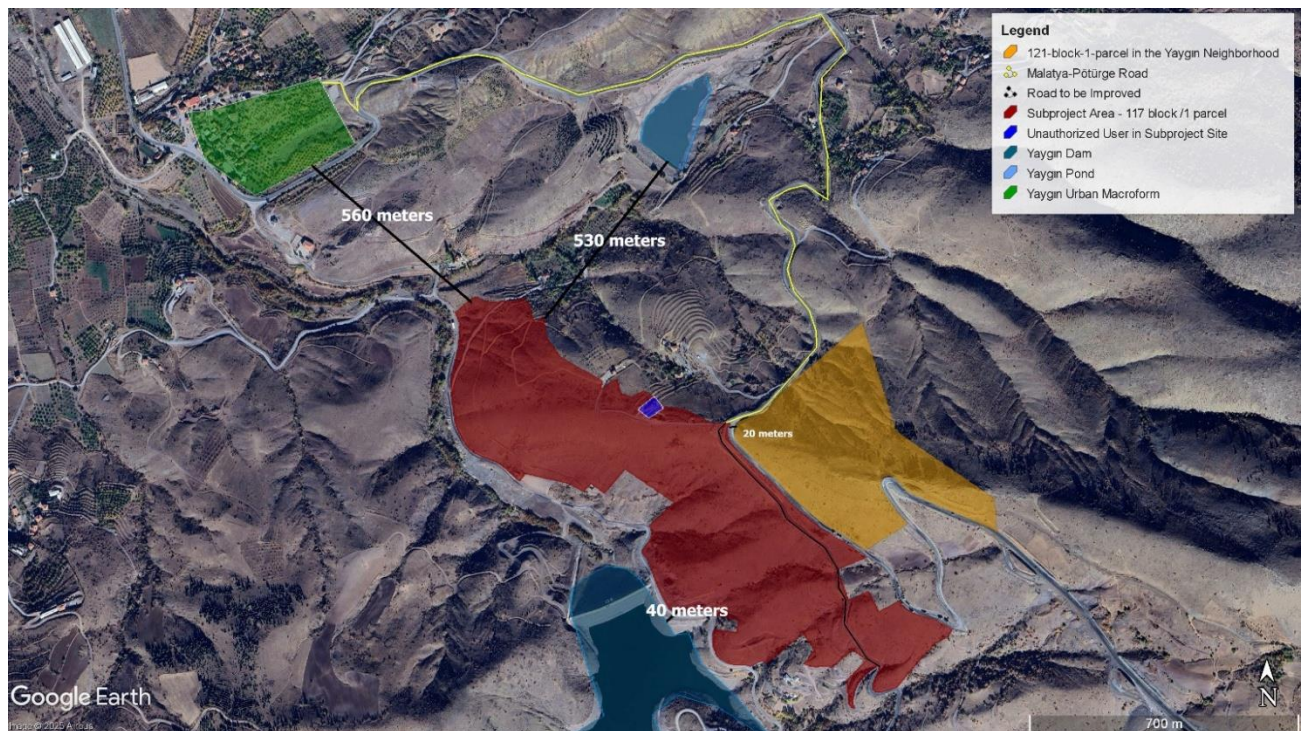


1.3.Location

The solar power plant subproject is located in Malatya Province, within the Battalgazi District, in the Yaygın Neighborhood, on a 447.399,72 m² land area situated on Block 117, Parcel 1. This land has been designated as treasury land by the Ministry of Environment, Urbanization and Climate Change, General Directorate of National Real Estate and allocated to the municipality for the Sub-project without any legal or expropriation issues. According to the

land registry, the site is classified as "Treasury Land - Raw Land" and belongs to the national state. According to the official letter dated **23.01.2025** from the Malatya Provincial Directorate of Agriculture and Forestry, the subproject area, located in Yaygın Neighborhood, Battalgazi District, is registered as treasury land and classified as agricultural land. Following field inspections and soil analysis, it was determined that the land has an average annual rainfall of 383.6 mm, a soil depth of less than 5 cm, and a slope between 6–30%, which qualifies the area as marginal agricultural land under the provisions of Law No. 5403 on Soil Protection and Land Use. Based on these findings, the Directorate confirmed that the parcel can be considered for non-agricultural **use** within the scope of Law No. 5403. Therefore, there is no legal obstacle for the implementation of a solar power plant project on this land in line with the relevant land use and zoning regulations. The subproject parcel is not located in the Büyük Plain and is classified as dry marginal agricultural land. A pre-allocation of 300,000 m² of the 447,399.72 m² immovable property belonging to the Treasury, 117 Block, 1 Lot was allocated to Sultangazi Municipality for the Solar Power Plant Project for 2 years. The pre-allocation period has been officially extended for an additional 2 years by the General Directorate of National Real Estate. The Sub-project site is located within the boundaries of Yaygın Neighborhood in Pötürge District of Malatya Province, positioned to the north of Yaygın Dam. The distance between the parcel boundary and the dam body is approximately 40 meters. There is an existing residential settlement at the parcel boundary, and additional residential areas are also present in the close vicinity. To the north of the subproject site lies the Malatya-Pötürge Road, while the Yaygın Neighborhood Road is located to the south. Furthermore, Yaygın Pond is situated approximately 530–560 meters north of the parcel boundary. .

Figure 3. Map of Subproject Location



1.4.Sub-project Impact Area

The Subproject Impact Area refers to the geographic region that may be affected by the direct, indirect, and cumulative environmental and social impacts of the subproject during its construction, operation, and decommissioning phases. This comprehensive definition covers not only the project footprint but also the surrounding environment, ecosystems, and settlements that may be affected by land use changes, natural resource utilization, emissions, noise, traffic, and socio-economic dynamics. In addition, areas that may be influenced by associated facilities and ancillary activities, as well as regions subject to cumulative impacts arising from interactions with other existing or planned projects, are also considered within this scope.

- **Direct Impact Area:** This refers to the area limited to the project footprint where construction, operation, and decommissioning activities will take place and where impacts will occur directly. It includes the project site, the transmission line route, temporary construction sites, access roads, and ancillary facilities. Direct impacts include land use changes, construction-related noise and dust, potential effects on surface water, solid waste management, and occupational health and safety risks.
- **Indirect Impact Area:** This includes environmental and social components located outside the project footprint but still likely to be affected by project activities. This area covers residential settlements, agricultural lands, forested areas, existing roads, and

infrastructure facilities. Indirect impacts may include increased traffic, pressure on land use, noise and visual impacts, risk of habitat fragmentation, and potential effects on the quality of life of local communities.

- **Cumulative Impact Area:** This refers to the geographic area where the subproject's impacts may combine with those of other existing or planned projects in the region, resulting in cumulative environmental and social outcomes. In this context, cumulative impacts may arise from interactions with other energy projects, transportation infrastructure developments, and agricultural activities. Such cumulative impacts may include shared use of water resources, increased pressure on biodiversity, deterioration in air quality and greenhouse gas emissions, and changes in the socio-economic structure.

The Impact Area for the Sub-project has been defined by considering both environmental and social components in accordance with ESS1 requirements. This approach ensures that the impact area covers directly affected areas, indirectly affected areas, and the wider area potentially exposed to cumulative impacts.

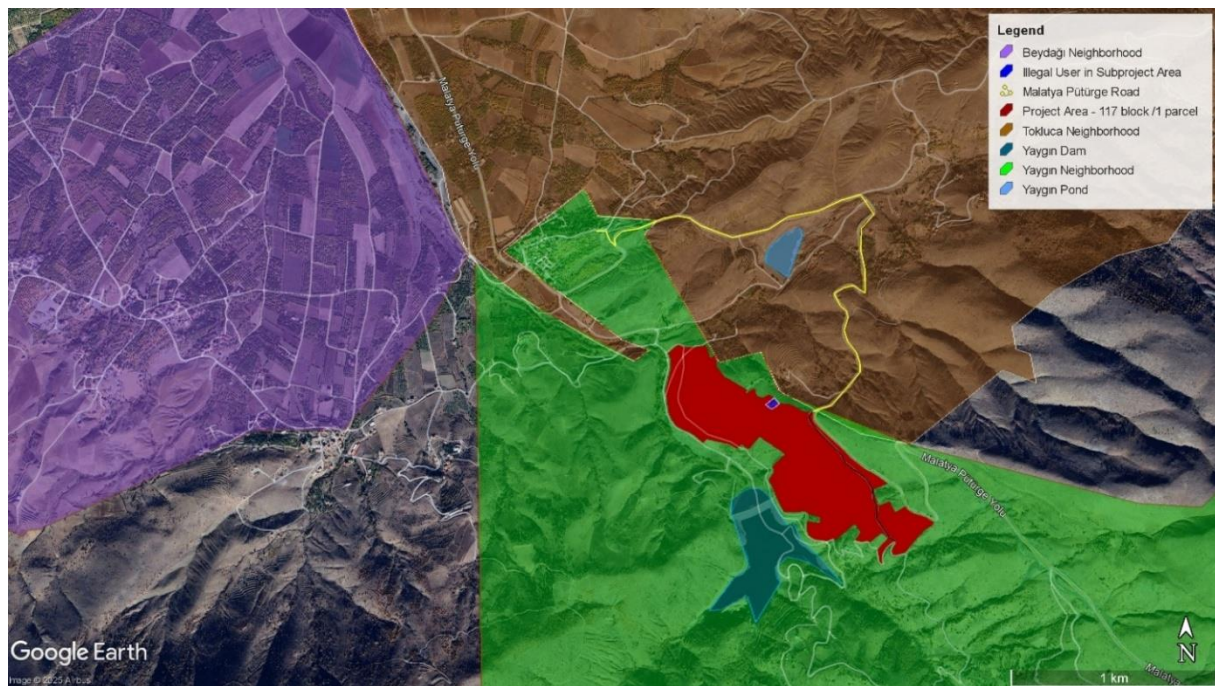
- **Yaygın Neighborhood:** The subproject site is located within Yaygın Neighborhood, approximately 700 meters from its center. A residential unit is located within the project parcel and is currently in use, while other residential units are located about 80 meters from the project boundary. Due to the project's direct location within the neighborhood and its close proximity to inhabited settlements, Yaygın Neighborhood is included as a core component of the impact area.
- **Tokluca Neighborhood:** Although located approximately 1.35–2 km from the project site, Tokluca is considered part of the impact area due to potential environmental and social impacts that may occur within a 2-2.5 km radius, including noise, dust, and visual impacts. In addition, six households close to the project boundary are engaged in cattle breeding, making them socio-economically sensitive to land use changes. Furthermore, the project's planned access road passes through the boundaries of Tokluca Neighborhood, increasing the likelihood of traffic-related impacts during construction and operation.
- **Beydağı Neighborhood:** Situated approximately 2.35 km from the project site, Beydağı has been included in the impact area because of the possibility of environmental and social effects within a 2–2.5 km radius. Although the neighborhood center is located

beyond the 2 km buffer, certain parts of the settlement area belonging to Beydağı Neighborhood fall within this radius and may potentially be affected. While residents do not directly utilize the project site, they may still be indirectly impacted due to shared transportation routes (e.g., Malatya-Pötürge Road) and potential cumulative impacts on the wider social and environmental setting.

- **Yaygın Pond and Yaygın Dam:** Both water bodies are located in close proximity to the project site and are important ecological and socio-economic assets for the local communities. Their inclusion within the impact area is necessary to ensure that potential impacts on water quality, biodiversity, and local livelihoods (e.g., fishing, irrigation) are fully assessed and managed.
- **Informal Users within the Project Site:** During field studies, the presence of informal users within the project parcel was identified. These individuals use the area for grazing and beekeeping without formal land rights. As such, they represent a socially vulnerable group that could be affected by the Sub-project, and their inclusion in the impact area is essential for assessing livelihood impacts and ensuring compliance with ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement).

In conclusion, the impact area has been determined to include Yaygın, Tokluca, and Beydağı Neighborhoods, Yaygın Pond, Yaygın Dam, and informal users within the project site. This definition is based on their geographic proximity, environmental sensitivity, land use interactions, and socio-economic significance. It ensures that both environmental and social risks are comprehensively assessed, and that mitigation and monitoring measures are designed to address the needs of all potentially affected communities and environmental receptors.

Figure 4. Sub-Project Impact Area



2. OBJECTIVE/ DESCRIPTION OF SEP

This Stakeholder Engagement Plan has been formulated to ensure that project-affected parties, other interested parties and vulnerable groups that constitute the “stakeholders” are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-Project and its impacts.

The objectives of the Stakeholder Engagement Plan of Sultangazi Municipality are as follows:

- To establish a systematic approach to stakeholder engagement that will help Sultangazi Municipality to identify all stakeholders and how they will be affected by the Sub-project and ensure that the Sub-project is implemented in a participatory and community-friendly manner through building and maintaining a continuous constructive relationship with them, in particular with all stakeholders.
- To assess the level of stakeholder interest and support for the Sub-project and to guide the relations of the Sultangazi Municipality team with the stakeholders throughout the installation and operation process, enabling stakeholders’ views to be taken into account in sub-project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with all stakeholders throughout the Sub-project life-cycle on issues that could potentially create an impact;
- To ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
- To provide all stakeholders with accessible and inclusive means to raise issues and grievances through multiple channels, including local complaint collection points in Malatya (e.g., neighborhood muhtarlık offices, site office, grievance boxes, and a dedicated phone/WhatsApp line), and to ensure that these grievances are promptly transferred to and managed by Sultangazi Municipality in Istanbul. This mechanism will clearly define local access points, procedures for transferring grievances to the municipality, and timelines for resolution, as explained in detail in the “Grievance Mechanism” section..

Stakeholder engagement plays a critical role for the successful completion of sub-projects, which has a wide stakeholder circle, from local people, vulnerable groups, public institutions and non-governmental organizations. SEP provides the framework for the stakeholder engagement and details the timing and methods of engagement with the different groups of stakeholders. SEP does not only identify the different stakeholder groups, but also identifies their needs and circumstances, and how they are being affected by the sub-project. The SEP pays special attention to identified disadvantaged or vulnerable individuals or groups and determines how to ensure their inclusion in the stakeholder engagement activities. The SEP takes into account the main characteristics and interest of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders, while defining the interaction with all stakeholders, also explores the opportunities and risks brought by interaction with them.

SEP ensures a transparent, sensitive, and inclusive participation by defining the framework for Sultangazi Municipality's dialogues across the sub-project's stakeholder groups, in an inclusive, non-discriminatory manner. Implementation of the SEP will:

- Generate a good understanding of the Sub-Project among those that will be affected in particular ensuring that host communities in the potentially affected areas will have a full understanding that the sub-project is of benefit to everybody within the Sub-project area,
- Ensure early identification of issues that may pose risks to the Sub-Project or its stakeholders,
- Ensure that mitigation measures are appropriate (adequate, implementable, timely, effective and efficient), and
- Establish a system for long-term communication between the Sub-Project and communities that is of benefit to all parties. This requires that the engagement strategy for the Sub-project ensure outreach to all stakeholder groups (e.g. host community), clearly informing them of the benefits from the Sub-project, and thereby reducing any social risk that misconception about the outreach of the Sub-project may cause.

SEP communication strategy vis-à-vis stakeholders also defines the mechanisms through which the stakeholders can express their concerns and transmit their grievances, and how such concerns and grievances will be responded to and resolved in a timely and adequate manner.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

During the mapping process of the stakeholders, the nature of the Sub-project's impacts are identified, and the methods and frequencies of the relations to be built with stakeholders are formulated.

It is critical that particular efforts are given to identify disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the sub-project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an ongoing process and will need to be regularly reviewed and updated.

3.1. Methodology

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

- **Openness and life-cycle approach:** Public consultations for the project will be arranged during the Project cycle, carried out openly, free of external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Information will be widely provided to all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- **Inclusiveness and sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the Project cycle. The participation process for the projects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and project implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Subproject's stakeholder

communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.

- In accordance with ESS 10, the Project has identified stakeholders, taking into account both project-affected parties and other interested parties, such as individuals or groups affected or likely to be affected by the project. Therefore, stakeholders have been identified and categorized as “project-affected parties” and “interested parties” (other individuals or groups that may have an interest in the project).

3.2.Affected parties

The term “project-affected parties” refers to individuals or groups likely to be impacted by the sub-project due to actual effects or potential risks to their physical environment, health, safety, cultural practices, well-being, or livelihoods. These stakeholders may include individuals and groups, particularly local communities.

The Impact Area includes the Yaygın, Beydağı and Tokluca Neighborhoods, selected due to its proximity to the sub project area. Potential impacts on environmental and social infrastructure elements, such as health services and waste collection, were considered during this selection. Furthermore, the presence of houses near the sub project area was one of the most significant factors in determining this neighborhood as part of the impact area. These nearby houses have been identified as sensitive receptors. Given their status as sensitive receptors, a meeting was held to gather their opinions. Additionally, an illegal structure within the sub-project parcel was identified as a sensitive receptor. The owner of this structure was also interviewed.

Moreover, the sub-project will be implemented in the Yaygın, Beydağı and Tokluca Neighborhoods, which was included in the impact area due to its administrative, social, and economic relevance as well as stakeholder participation considerations. Since the project area is not used for pastureland or agricultural purposes, these factors were not considered as determinants of the social impact in the neighborhood. It was determined that there is no infrastructure, such as housing, schools, or septic tanks, that could potentially be damaged along the main road route.

The characteristics of the local communities, including population, economy, and social and physical infrastructure, were identified through interviews held with the mukhtars of Yaygın, Tokluca and Beydağı Neighborhoods.

Additionally, the water resources located near the project area (Yaygın Pond and Yaygın Dam), as shown in

Figure 6, are considered sensitive receptors in terms of environmental sustainability. These water resources are critical for maintaining ecological balance and meeting the water needs of nearby settlements. Necessary measures will be taken, and efforts will be made to minimize the potential impacts of project activities on these sensitive areas and to ensure their protection. In this context, protective measures against environmental risks, such as soil erosion, sediment transport, and chemical pollution, will be prioritized and implemented.

The project affected parties, including individuals, groups and communities, who will cooperate and consult on and during the sub-project are as follows:

- Yaygın, Beydağı and Tokluca Neighborhoods
- Houses located on the parcel where the project will be made and houses located nearby
- Water Resources (Yaygın Pond and Yaygın Dam)

The Yaygın Neighborhood and houses nearby subproject parcel and Water Resources can be seen in the Figure 5 and Figure 6.

Figure 5. Nearest Settlements

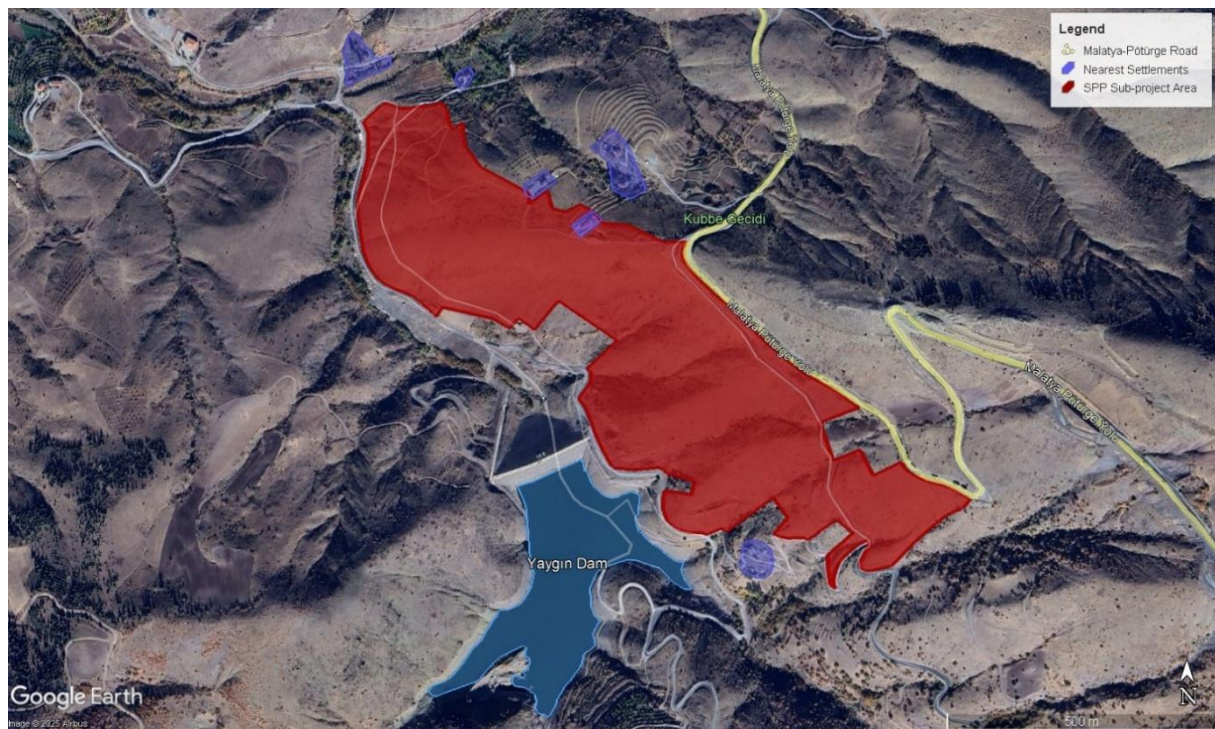
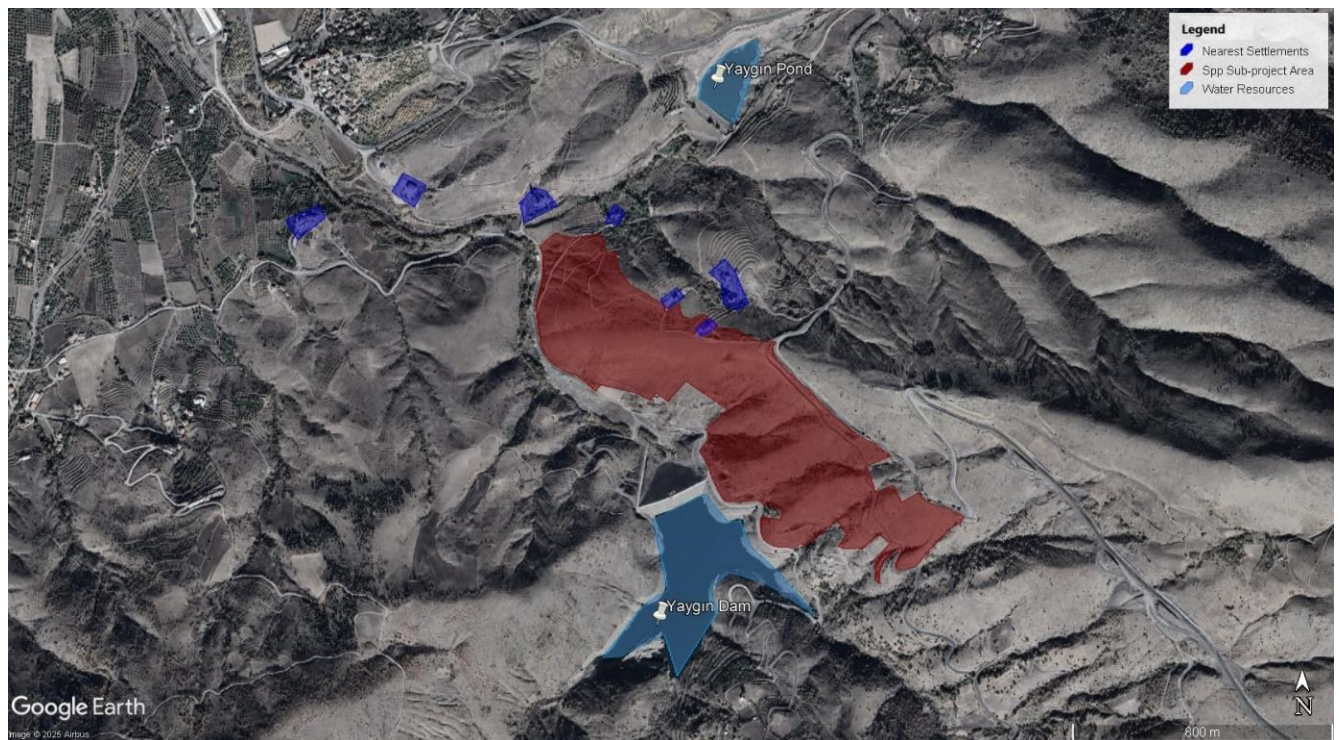


Figure 6. Water Bodies Near the Subproject Area



3.3. Disadvantaged/ vulnerable individuals or groups

Disadvantaged/Vulnerable individuals or groups are people who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the subproject.

Their participation, inputs and needs will inform sub-project design and implementation.

In the sub-project context, vulnerable individuals/groups would include:

1. **Disabled individuals:** Construction activities can disrupt accessibility routes and restrict mobility. They may have special needs for access to participation activities. There are disabled individuals and people with chronic illnesses or in need of special care in the Neighborhood in AoI.
2. **People over 65 years of age Living Alone and need special Care:** Construction activities can disrupt the daily routines and access to basic services of elderly individuals over 65 who live alone and require special care, potentially causing discomfort or stress. They may have specific needs for access to participation activities.
3. **Immigrants and Refugees:** Refugees may have difficult living conditions and limited resources, making them more susceptible to the impacts of the sub-project. Their legal status and lack of access to certain services can also heighten their vulnerability.
4. **People with chronic illnesses or in need of special care:** Construction-related activities (traffic, damage to infrastructure, etc.) can affect access to basic services and routines, exacerbate health problems or cause discomfort.
5. **Female head of households:** Female heads of households with special needs may have limited participation in consultations.

The table below was filled with information received from the Mukhtars of AoI Neighborhoods.

Table 1. Vulnerable Groups in the Social Impact Area

Number	Yaygın Neighborhood	Tokluca Neighborhood	Beydağı Neighborhood
Refugees	-	-	-
Disabled individuals	15	2	4
People over 65 years of age	-	-	4
People with chronic illnesses or in need of special care	-	-	-

Female head of households	-	-	-
---------------------------	---	---	---

3.4. Other Interested Parties

Other interested parties include individuals, groups and others who may have an interest in the sub-project because of their location, proximity to natural or other resources, or the sector or parties involved in the sub-project. This may include local government officials, community leaders, media and civil society organizations, particularly those working in or with affected communities.

Maintaining regular relationships with media stakeholders is sufficient to provide regular information at local and national level in Sultangazi Province. In all cases, the media plays an important role in informing the public and building public perception of the sub-project.

Stakeholder groups within the scope of the sub-project are as follows in Table 2 **Hata! Başvuru kaynağı bulunamadı..**

Table 2. Stakeholder Groups

Stakeholder Group		Cause of Impact/Risk	Level of Interest	Level of Influence
Project Affected Parties	Local communities (Yaygın , Tokluca and Beydağı Neighborhoods)	Settlements that have the potential to be directly adversely affected by sub-project activities due to their proximity to the sub-project site in terms of dust, noise, traffic, labor influx, land acquisition issues, etc.	High	High
	Nearby Properties (Houses within the Project Parcel and Nearby Houses)	Houses very close to the project area may be exposed to high levels of noise and dust during the construction phase. Air pollution that may occur due to heavy machinery used may negatively affect their daily lives. In addition, the visual discomfort of the project and the concern about structural damage caused by vibration are among the significant risks for these houses. Due to the intensity of construction	High	High

		activities, it is expected that the daily lives of the residents of these houses will be directly affected.		
	Workers (including supply chain) to be employed for the sub-project activities	Potential risks related to labour and working conditions, etc.	High	High
Vulnerable individuals or groups	- Disabled individuals; - People over 65 years of age; - Immigrants and refugees; - People with chronic illnesses or in need of special care; - Female head of households.	Vulnerable groups might be disproportionately affected by adverse sub-project impacts	High	High
Other Interested Parties	NGOs	Environmental and social impacts of the sub-project (depending on NGO's field).	High	Low
	- Governmental Bodies - Ministry of Industry and Technology, - Ministry of Energy and Natural Resources, - Governorship of Malatya, - Malatya Provincial Directorate of Environment, Urbanization and Climate Change - Sultangazi Municipality - Local administration - Press Agencies - Local Newspapers	A positive impact is expected with the energy generated from the subproject. Government agencies may be involved in the permitting process, land acquisition process or in organizing consultations with communities.	High	Medium

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of stakeholder engagement done during project preparation

4.1.1. Previous Stakeholder Engagement during EIA Process

In accordance with Article 9 of the Environmental Impact Assessment (EIA) Regulation for the project in question, a Public Participation Meeting was held on 28.05.2024 at Battalgazi District, Yaygın Neighborhood Culture Center, to inform the public about the project and to receive their opinions and suggestions. The meeting included local community members and the mukhtars of Yaygın, Beydağı, and Tokluca Neighborhoods. During the project preparation phase, a public participation meeting was organized in line with stakeholder engagement activities required for projects exceeding 10 MW. Specifically, this meeting included representatives from local communities within the social impact area, including Yaygın, Beydağı and Tokluca Neighborhood, as well as the mukhtars, to gather feedback and provide detailed information about the potential impacts of the project. The meeting aimed to ensure the active involvement of stakeholders and address any concerns raised by the community. During the meeting, several concerns and expectations were raised by the community:

- **Post-earthquake resettlement needs:** Local residents emphasized that the project area, previously considered for solar power plant installation, was also seen as a potential site for post-earthquake mass housing. They expressed concerns that using this land for energy purposes might conflict with community resettlement needs.
- **Impacts on agriculture and livestock:** Participants highlighted that grazing areas and agricultural activities could be negatively affected by the project, particularly because the site is currently used by nearby villages.
- **Community acceptance and expectations:** The mukhtars and citizens underlined that while renewable energy projects are generally supported, implementation must consider local needs and vulnerabilities. The earthquake of 2023 was repeatedly mentioned, and participants requested that alternative land use (housing priority) be carefully evaluated.
- **Social concerns:** It was noted that the loss of grazing and agricultural areas may create additional livelihood difficulties for local households.

The concerns expressed during the meeting were officially recorded in the minutes and signed by the representatives of the Ministry of Environment, Urbanization and Climate Change. These records confirm that the project implementation should address the issues of resettlement, land use conflicts, and livelihood impacts in order to ensure meaningful stakeholder engagement and social acceptance.

4.1.2.Stakeholder Engagement During the ESMP Preparation Process

During the ESMP preparation process, interviews were held with local mukhtars in January 2025. On January 17, 2025, the Mukhtar of Yaygın Neighborhood underlined that the project site is currently used by residents for grazing and beekeeping, also noting the presence of a residential settlement within the area. On January 24, 2025, the Mukhtar of Tokluca Neighborhood stated that while only a few households close to the boundary engage in cattle breeding, following the February 6 earthquakes both Tokluca and Yaygın residents expressed interest in designating the site for post-earthquake mass housing, emphasizing as well the importance of the Malatya-Pötürge Road as a key transport link. On the same date, January 24, 2025, the Mukhtar of Beydağı Neighborhood explained that the project site is not actively used by his community due to its distance and the presence of the Yaygın Dam, indicating that the project would have minimal impact on Beydağı residents, while again highlighting the strategic significance of the road and the dam for the region.

On September 30, 2025, a site visit was conducted in the Sub-project impact area, covering Yaygın, Beydağı, and Tokluca neighborhoods. During this visit, local residents were informed about the Sub-project and their opinions were gathered through the Community-Level Questionnaire prepared for the ESMP. Project details were explained to all participants, and the project site was shown using maps.

In Yaygın Neighborhood, four residents were interviewed. They stated that they had already been informed about the project during the previous EIA public consultation meeting and by Mukhtar. Overall, they expressed no objections to the project and found it beneficial in terms of creating employment and producing clean energy. Among the participants, two were construction workers, one was a civil servant, and one was engaged in trade and farming. They all reported that they do not use the project site for any activity and confirmed the availability of alternative grazing areas nearby. They mainly emphasized the need for mitigation measures against traffic, dust, and noise during construction.

In Tokluca Neighborhood, three residents were reached, two of whom are farmers and one a wage worker. None of them use the Sub-project area or its surroundings for livelihood purposes. Two participants expressed concerns that the project might harm agriculture and affect fruits and vegetables. It was explained that solar power plants do not negatively affect agricultural activities and that the project will contribute to clean energy production. Participants also underlined the potential benefits of road improvements, employment opportunities, and reduced energy costs.

In Beydağı Neighborhood, four residents—all farmers—were consulted. They also stated that they do not use the sub-project site but mentioned the availability of alternative grazing areas outside of it. One participant asked whether the electricity generated would benefit them directly; it was explained that the energy produced would feed into the national grid rather than provide local supply. Another participant raised concerns about the risk of electric shock, which was addressed by explaining that such risks are extremely low due to the closed electrical system and fenced project area. Overall, participants from Beydağı emphasized the project's potential positive contributions in terms of road improvements and employment opportunities.

The draft version of this ESMP, approved by ILBANK and the World Bank, was shared with district residents during the public consultation meeting held at the Battalgazi Municipality Yaygın Neighborhood Culture Center on 9 December 2025. The Sultangazi Municipality Solar Power Plant (SPP) Project is one of the sub-projects implemented under the financing of the Public and Municipal Renewable Energy Project (KABYEP-PUMREP), which aims to support sustainable development in cities in Türkiye.

During the Public Participation Meeting, Sultangazi Municipality officials and representatives of the consultancy firm provided information about the project. The opening speech of the meeting was delivered, and general information about the projects was shared with the public. The Consultancy Firm Team emphasized the importance of the projects, noting that they are carried out within the scope of PUMREP (KABYEP) with World Bank financing. It was stated that these projects are an important step for Sultangazi and Battalgazi in terms of renewable energy and combating climate change. It was explained that with the Solar Power Plant (SPP) project, a significant portion of Sultangazi's energy costs will be met through clean energy.

The planned duration of the project was also shared, with completion expected within six (12) months. Along with the presentation by the Ardea Team, the projects were introduced, and

information on the Environmental and Social Management Plan (ESMP) was provided. The location and technical details of the project sites were explained.

Within the scope of the ESMP, the environmental and social risks of the projects were assessed, and analyses on the current situation, land geography, climate conditions, vegetation, natural and cultural values, were shared with the public. Possible environmental and social impacts on and around the project sites, along with mitigation measures, were described. It was emphasized that through the use of renewable energy sources, the projects will contribute to combating climate change and offer future opportunities for local residents.

It was noted that the project to be implemented in the Battalgazi district will also provide various social benefits and serve as a model for the region. In addition, it was stated that the grievance mechanism will be prioritized during both the construction and operational phases and that this mechanism will be implemented effectively.

The Public Consultation Meeting, organized in cooperation with Sultangazi Municipality, was attended by municipal staff, representatives of the consultancy firm, and local residents — a total of 12 participants — and lasted 45 minutes. During the meeting, the project's purpose, technical details, environmental and social impacts, and benefits for the public were explained in detail, with particular emphasis on the measures to be taken during construction and operation phases. Questions from participants were answered by the project team, and suggestions and opinions from the public were carefully listened to and recorded. At the end of the meeting, information was provided about the next stages of the project, and the channels through which the public could stay in contact throughout the process were shared.

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

4.2.1. Public/community meetings

The first Stakeholder Consultation Meeting (SCM) of the subproject will be held following the approval of the draft ESMP report in a selected venue in project impact area (Battalgazi, Malatya) which will have sufficient capacity and facilities, thus facilitating comfortable and efficient communication. Above mentioned PAPs and OIPs will be invited to the SCM. The Meeting will be held with the participation of the residents of Yaygın, Beydağı, and Tokluca Neighborhoods, which have been identified as the social impact area.

Prior to the SCMs, announcements will be published in local and national newspapers, and on Sultangazi Municipality and Battalgazi Municipality's official websites. Sub-project information brochures will be distributed 10 days prior to the meeting to the participants before the meetings begin and subproject maps will be made available in the brochures and in public places like village tea houses, mukhtars' offices (Yaygın, Beydağı and Tokluca). Not only will announcements be made through official means, but also the involvement of the local people will be encouraged by contacting the mukhtars prior to the meeting in order to encourage them about the meeting and the sub project.

The meeting will be held to provide information about the sub project, answer the questions of the local people and express their concerns, if any. This meeting will be an important step in minimizing the social impacts of the project and strengthening cooperation with the local community.

4.2.2. Media communication

Information will be widely shared through various media channels, as local media usage is prevalent among individuals of different ages and backgrounds in the communities impacted by the sub-project. These channels will include local radio and TV stations, newspapers, social media, community websites and forums, SMS and mobile notifications, public notice boards, as well as community meetings or public announcements. The Sultangazi Municipality's communication platforms and channels will also be utilized to ensure broad dissemination of information.

Beyond the municipality's official communication channels, locally accessible tools will be used in Malatya, including information boards at mukhtar offices, local radio, and distribution of brochures in neighborhoods. Flyers and posters will be placed in Yaygın, Tokluca, and Beydağı to ensure easy access to information by local residents.

4.2.3. Communication materials

Written information will be made available to the public through various communication tools and materials such as brochures, flyers, posters, etc. Sultangazi Municipality will also regularly update its websites with sub-project key updates and reports on the environmental and social performance of the Sub-project. The websites will also provide information on the grievance mechanism for the Sub-project (see section 4.2.7 below). All stakeholder engagement processes will be recorded, monitored, evaluated and reported with consultation and backup documents such as participant lists, photographs, records, etc.

4.2.4. Project tours for media, local representatives

If needed, site visits or demonstration tours will be organized for selected stakeholders from media organizations or local government during all phases including construction, operation and decommissioning of the sub-project.

4.2.5. Information desks

The Information Desk at Sultangazi Municipality building will provide information to local residents on stakeholder engagement activities, construction updates, contact information for complaint methods, etc. Brochures and flyers on social and environmental issues related to the various sub-projects will be available at these information desks.

In addition to the information desk at Sultangazi Municipality in Istanbul, local information points will be established in Malatya, particularly in mukhtar offices, where stakeholders can obtain project updates, grievance mechanism information, and communication materials.

4.2.6. Proposed strategy to incorporate the view of vulnerable groups

The sub-project will implement specific measures to ensure that disadvantaged and vulnerable groups (such as women, the elderly, disabled individuals, and refugees) have equal access to information, opportunities to provide feedback, or submit grievances.

The identification of vulnerable stakeholders will be an ongoing process, requiring regular review and updates. Engagement methods will be tailored to appropriately inform women, the elderly, disabled individuals, and refugees, while also understanding their views and concerns. Focus group meetings, women's meetings, and the provision of translators for refugees dedicated specifically to vulnerable groups may be considered as necessary.

In Malatya, the Provincial Immigration Administration will facilitate communication and engagement with the refugee population. Additionally, the District Social Assistance and Solidarity Foundation will be the point of contact for refugees seeking assistance. Sultangazi Municipality will collaborate with these governmental bodies during the engagement process if required.

4.2.7. Information disclosure

From the early stages of the sub-project lifecycle, information about the sub-project and the grievance mechanism will continue to be disclosed to the public through individual or group meetings, printed materials, and notice boards, as well as SMS. The current Sultangazi Municipality and Battalgazi Municipality website (<https://www.sultangazi.bel.tr/>) and consultation meetings will be used to disclose sub-project documents.

The sub-project documents, including the ESMP and SEP, will be available at the Sultangazi Municipality and Battalgazi Municipality offices. Sub-project posters, brochures, and information related to the grievance mechanism and the sub-project will be provided in local areas such as the Yaygın , Beydağı and Tokluca mukhtar’s offices, coffee houses, or mosques. Sub-project updates (including news on construction activities and basic environmental and social data) will also be posted on the homepage of Sultangazi Municipality's website. Additionally, details about the sub-project Grievance Mechanism will be posted on the website. To enable stakeholders to submit their complaints, an electronic grievance notification system will be established via email (cagri@sultangazi.bel.tr) and a communication hotline accessible at 444 23 32. Sultangazi Municipality will regularly update and maintain its website.

Sub project-related documents (ESMP, SEP, brochures) will not only be available in Istanbul but also in Malatya, particularly at the mukhtar offices of Yaygın, Tokluca, and Beydağı. Furthermore, complaint boxes and notice boards will be installed in these neighborhoods to ensure the accessibility of the grievance mechanism.

4.3. Stakeholder engagement plan

The main goals of the stakeholder engagement program and the planned schedule for the various stakeholder engagement activities are to describe at what stages throughout the Sub-project’s life these activities will take place, and with what periodicity. Where decisions on public meetings, locations, and timing of meetings have not yet been made, information is provided on how people will be made aware of forthcoming opportunities to review information and provide their views.

SEP ensures preparation of an open profile of the stakeholders and clear sight of the relationships between the sub-project and stakeholders. Meeting with all of the stakeholders listed in the matrixes on the underlined subject matters at the pre-determined timeline is crucially important. The frequency of the meetings can be increased when needed.

SEP in Table 3 presents the nature and level of stakeholders’ interest in the sub-project and the ways the engagement will be conducted, the engagement frequency and the PIU of Sultangazi Municipality and the following matrix is the tabulated version of this program.

The parts analyzed by the matrix are as follows in Table 3. Subject of Meeting/Interview identifies the subject matters that need to be discussed with the stakeholder at the predetermined frequency.

- Method of Information specifies the communication tools and ways that may be used for engagement, such as face-to-face meetings, website announcements, SMSs, and brochures, etc.
- Frequency establishes a calendar for engagement.

The responsible party/person is required to be determined by the Sultangazi Municipality representatives. The Sultangazi Municipality will be responsible for implementing the stakeholder engagement process even in case that actual stakeholder engagement works may be contracted to a third party.

The following stakeholder engagement program represents key characteristics, preferred notification means and specific needs for stakeholder groups.

Table 3. Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Before the construction phase starts	Informing affected communities about the subproject, potential impacts, and grievance mechanism	• Web site • Flyers, posters • Info desk at Sultangazi Municipality and Battalgazi Municipality • Announcements by mukhtar • Press release • Social media • Face-to-face information meetings • Brochures	• PAPs • OIPs • Vulnerable/disadvantaged individuals/groups	Sultangazi Municipality
	Before the construction phase starts	Ensuring the participation of vulnerable/disadvantaged groups in consultation activities and addressing their concerns	Disabled Individuals • Municipality info desk for in-person inquiries • Sign language support at face-to-face meetings • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. • Announcements won't be made	Vulnerable/disadvantaged individuals/groups in Sultangazi Neighborhood -Disabled Individuals -People over 65 years of age -Immigrants and refugees -People with chronic illnesses or in need of special care -Female head of households	Sultangazi Municipality

			through mukhtars, as this method may not reach people with disabilities effectively. Instead, more direct and accessible ways like SMS, call centers, or home visits will be used. People Over 65 Years of Age • Announcements by the mukhtars of AoI • Printed brochures with larger fonts • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. Immigrants and Refugees • Interpreter support at face-to-face meetings • Social media announcements for easy access • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. People with Chronic Illnesses or in Need of Special Care • Website updates for remote access • Flyers and posters at key locations • Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed. Female Heads of Households • Announcements via social media		
--	--	--	--	--	--

			- Flyers and posters in community centers - Participation in meetings can be facilitated through accessible transportation or municipal vehicles if needed.		
Construction	Monthly	Updates on construction activities, potential disruptions, and grievance mechanism	Website, social media, announcements, meetings	PAPs OIPs	Sultangazi Municipality Supervision Consultant Contractor
	Monthly after construction begins	Monitoring and addressing specific needs of vulnerable groups	- Grievance Mechanism (complaint/feedback system) - Face-to-face consultations if needed - Telephone support for accessibility (including sign language support if required) - Website updates for relevant information	Vulnerable/disadvantaged groups	Sultangazi Municipality Supervision Consultant Contractor
	Monthly	Occupational health and safety training and updates on working conditions	Information brochures, grievance mechanism, toolbox trainings	Sub-project workers	Sultangazi Municipality Supervision Consultant Contractor
	Monthly	Updates on project progress and compliance with regulations	Face-to-face meetings, correspondence	National and provincial public institutions	Sultangazi Municipality Supervision Consultant Contractor
Operation	Yearly	General subproject updates and long-term monitoring	Website, social media, flyers, posters	All residents in Sultangazi	Sultangazi Municipality
	Yearly	Ensuring continued accessibility	Website, social media, flyers, posters	Vulnerable groups in Sultangazi	Sultangazi Municipality

		and inclusion of vulnerable groups			
	Yearly	Compliance updates and coordination	Correspondence	National, provincial, and district-level public institutions, district municipalities, mukhtars of indirectly affected neighborhoods	Sultangazi Municipality
	Yearly	Media engagement and public communication	Face-to-face meetings, telephone, press releases, interviews	Press agencies, local newspapers	Sultangazi Municipality

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Resources

Sultangazi Municipality will mobilize human and material resources to implement the SEP and manage the Grievance Mechanism (GM). Sultangazi Municipality will be primarily responsible for coordinating stakeholder engagement activities with the Contractors as outlined in this SEP. The collection of grievances, questions and feedback will be the direct responsibility of the Social Affairs Manager of the Sultangazi Municipality and the Contractors' E&S Specialist.

The material resources that Sultangazi Municipality will mobilize are:

- Sub-Project specific page on Sultangazi Municipality's and Battalgazi Municipality's website;
- Electronic grievance database;
- Stakeholder engagement register;
- Printed documents (manuals, brochures, posters, etc.) to be used in accordance with SEP requirements.

5.2. Management and Functions and Responsibilities

Sultangazi Municipality PIU is the main responsible party for the implementation of the SEP. PIU will have designated staff responsible for SEP and GM.

The roles and responsibilities of these stakeholders are summarized in below Table 4.

Table 4. Roles and Responsibilities of Key Actors/Stakeholders in SEP Implementation

Institution	Roles and Responsibilities
Sultangazi Municipality Grievance Mechanism Contact Person	• Planning and implementation of the SEP; • Leading stakeholder engagement activities in close collaboration with the ILBANK PMU; • Management and resolution of grievances; • Consultation on specific SEP activities; • Announcing the important construction activities (such as road closures and service interruptions); • Reporting on implementation of SEP activities to ILBANK PMU; • Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status.
ILBANK	• Monitor and control whether Sultangazi Municipality fulfills its responsibilities; • Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues; • Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues

Institution	Roles and Responsibilities
E&S Consultant	• E&S Consultant is responsible for preparing the Environmental and Social Assessment Study Reports, i.e. ESMP and SEP, for the approval of ILBANK and WB; • Taking a part in organizing the ESMP introduction meeting to be held for the public and NGOs as part of the Sub-project; and • Finalizing the reports as per the concerns/opinions of the stakeholders.
Contractors/sub-contractors	• Inform Sultangazi Municipality on any issues related to engagement with stakeholders; • Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by Sultangazi Municipality • Inform ILBANK PMU and Sultangazi Municipality on important construction activities (such as road closures and service interruptions) and of any issues related to their engagement with stakeholders; • Maintaining contact with the Sultangazi Municipality GM Focal Point for the follow up of the grievances, • Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing, • Informing local communities of any environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.), • Developing and implementing a grievance mechanism both for the E&S performance of the sub-project and for their workforce including sub-contractors, prior to the start of works in compliance with Sultangazi Municipality's GM requirements.

6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of the public grievance mechanism and the workers grievance mechanism is to provide access to a grievance resolution procedure for Subproject affected people, including communities and Subproject workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between SubProject worker's, local communities, and other stakeholders.

In the Sub-Project Level Grievance Mechanism, Public Grievance Mechanism and Worker Grievance Mechanism, grievances will be submitted in Turkish through Turkish forms. In addition, if a stakeholder who does not speak Turkish but have grievances about the environmental and social performance of the subproject or, necessary language support will be immediately provided by Sultangazi Municipality.

The structured GM will ensure that grievances associated with the Sub-Project are addressed through a transparent and impartial process. The public will be informed about the GM through the disclosure and consultation of the SEP and through the stakeholder engagement activities to be conducted throughout the life of the subproject.

6.1. Grievance Mechanism at National Level

The intake channels for the existing national level GMs are provided below:

Presidency's Communication Centre (CIMER): The Presidency's Communication Centre (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **CIMER Website:** www.cimer.gov.tr
- **CIMER Call Centre:** 150
- **CIMER Phone number:** +90 312 525 55 55
- **CIMER Fax number:** +90 0312 473 64 94

- **Address for Official Letter:** Republic of Türkiye, Directorate of Communications Kızılırmak Mah. Mevlana Bulvarı No:144 Çankaya/Ankara
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the community relations desks** at governorates, ministries and district governorates

The Foreigners Communication Centre (YIMER): The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **YIMER Website:** www.yimer.gov.tr
- **YIMER Call Centre:** 157
- **YIMER Phone number:** +90 312 5157 11 22
- **YIMER Fax number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No:4 Yenimahalle/Ankara
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

ILBANK Grievance Mechanism: ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Sub-project. Complainants may - if they wish - submit their grievances to ILBANK as a higher authority through the following communication channels:

- **ILBANK Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **ILBANK E-mail:** bilguidb@ilbank.gov.tr and etikuidb@ilbank.gov.tr
- **ILBANK Phone number:** +90 312-508 79 79
- **ILBANK Address for Petition Service:** ILBANK Department of International Relations, GM Team (letters must be marked as personal or confidential) Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the sub-project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

6.2. Project Level Grievance Mechanism

Sultangazi Municipality handles public grievances and views through its website and complaint hotlines. This municipal GM system was established to receive grievances and requests from local citizens and intended to produce possible solutions within Sultangazi Municipality for reported concerns. Sultangazi Municipality's communication channels are provided below in Table 5.

Table 5. Contact Details of Sultangazi Municipality

Web page	Phone	Address for Official Letter	E-mail
https://www.sultangazi.bel.tr/	Call Center 444 23 32	Uğur Mumcu, Atatürk Blv No:54, 34265 Sultangazi/İstanbul	cagri@sultangazi.bel.tr

Sultangazi Municipality actively uses the website <https://ulakbel.sultangazi.bel.tr/WebBasvuru/istekvesikayet-web#/> for managing complaints, suggestions, and requests from the public in a more efficient digital manner. Through this platform, users can submit their complaints and suggestions, facilitating faster communication with the municipality. Please see Figure 7.

Figure 7. Screenshot from Sultangazi Municipality Website for Receiving Grievances

İstek ve Öneri Başvurusu

Kimlik No *

Doğum Tarihi *

Ad *

Soyad *

Cep Telefonu *

Kişi Bilgilerini Gizle ☐ HAYIR

Email

Mahalle *

Başvuru Metni *

Dosya

5 m2 p 5

Apart from the ILBANK Grievance Mechanism and in addition to all existing GMs at national level, a grievance mechanism will be established by Sultangazi Municipality in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities as sub-project level. Grievance Mechanism (GM) as per WB will be implemented by Sultangazi Municipality throughout the lifetime of the sub-project including pre-construction, construction, and operation phases. Sultangazi Municipality PIU and construction contractor will be accessible for the stakeholders and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team. The personnel to be appointed by Sultangazi Municipality will record the grievances and requests coming from different channels in a single established system and will provide solutions within the time and application framework determined in as described above, within the scope of this subproject, there will be different levels of GMs to be operationalized by different institutions and subproject parties. All GMs to be utilized in this subproject will follow the process flow. The Sultangazi Municipality personnel will record all grievances received through different GM channels presented in this SEP (including all verbal and written grievances even through the grievance boxes installed in the municipal building and any stakeholder engagement event/meeting) in their GM log.

Sultangazi Municipality personnel to be assigned (Sultangazi Municipality GM Focal Point) will constantly be in contact with other Sultangazi Municipality experts, contractors, and personnel who will be involved in the operational phase. Additionally, the job description of

Sultangazi Municipality personnel to be assigned will include the introduction of grievance mechanisms, which are publicly available and will be set up separately for employees, to relevant stakeholders.

Any grievances received by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to Sultangazi Municipality's call center and Sultangazi Municipality's subproject level grievance mechanism.

Samples of grievance form and grievance closure and consultation form prepared for use within the scope of the Sub-Project are given in Annex E and Annex F.

There will be different levels of GMs to be operationalized by different institutions and project parties. All GMs to be utilized in this Sub-Project will follow the process flow given in Table 6.

In addition to the central grievance channels of Sultangazi Municipality (call center, website, email), local access points will be established in Malatya to ensure the accessibility of the mechanism for affected communities. These will include grievance boxes and information boards at the mukhtar offices of Yaygın, Tokluca, and Beydağı Neighborhoods. Community members will also be informed about the grievance mechanism during public meetings and through the distribution of brochures and posters in Malatya. This will ensure that residents who may have limited access to online tools are also able to submit grievances. Since the implementing institution is based in Istanbul, special emphasis will be placed on ensuring that the grievance mechanism is directly accessible to Malatya residents. For this purpose, complaints submitted through local channels will be regularly collected and transferred to Sultangazi Municipality's PIU for resolution. All grievances received through local access points in Malatya will be logged, monitored, and reported in the same manner as those received via Sultangazi Municipality's central system, in compliance with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response).

Table 6. Grievance Mechanism Flow Chart

Grievance Process	Requirement / Action
Submission of a complaint	Receiving the grievance by any communication channel explained above. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2days after receiving of the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the Sub-project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”)
Registration of complaint	Registering/recording through making an entry in the sample grievance register table. All the complaints will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously, and the request will be met.
Forwarding of complaint	The complaint is forwarded to relevant people (site manager on construction sites and experts of the PIU) responsible for handling the complaint in not later than three working days upon receiving the complaint (except for any emergent complaint, which would be handled as appropriate).
Evaluation of a complaint	Evaluating the complaints within 10 working days and determining whether the complaint meets the admissibility criteria.
Response for a complaint	If the complaint is valid, identify and taking corrective measures for resolving the complaint in not later than 15 working days upon receiving. If resolving the complaint took longer, a partial response could be provided to the complainant and fill the Grievance Closeout Form All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. At this point, it should be noted that the action taken, and the result of this anonymously recorded grievance should be shared on the Sultangazi Municipality website, so that anonymous complainants is informed about their complaint and the results.
Recording the result of a complaint	Recording the result of the complaint on the register table.
Right to Appeal	If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follows: • Civil Courts of First Instance • Administrative Courts • Commercial Courts of First Instance • Labor Courts, and • Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

The officer appointed by Sultangazi Municipality for the Public Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form (Annex E). Moreover, on the basis of their contents, by Sultangazi Municipality PIU and that the corrective/regulatory action to be taken is acceptable to Grievance Mechanism Contact Person (GMCP) of Sultangazi Municipality PIU. Such responses to the grievances would be satisfactory for both parties and activities would be followed and the complainants would be informed on the outcomes of the corrective activities. Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Annex F). Thus, all activities carried out under the grievance mechanism will be recorded and care will be taken to establish a transparent relationship between the public and Sultangazi Municipality.

In case the grievance is raised anonymously, a summary of the grievance and resolution will be posted on the Sultangazi Municipality's website and on notice boards located around the Sub-Project Administrative Building in construction area as well as in the headman's offices in the settlements that are anticipated to be affected.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Sub-Project 's lifespan. All stakeholders initiating grievance will have an opportunity to claim their case in a confidential manner. Sultangazi Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

Management of Sexual Exploitation and Abuse/Sexual Harassment issues

Since there are special procedures/principles for handling sensitive content grievances (i.e. sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in Sub-Project areas), these grievances will be handled centrally at ILBANK, not at the Sultangazi Municipality or Contractor level¹.

¹https://www.ilbank.gov.tr/storage/uploads/pagefiles/rev3_esmf_tefwer_draft_ilbank_25052023_clean_1685431185.pdf

ILBANK's GM procedure has been prepared in accordance with WB ESF/ESS10 and it also complies with the World Bank's environmental and social standards². In case a sensitive complaint is received³ by the Contractor or Sultangazi Municipality, they will be responsible for conveying the issue directly to the ILBANK GM focal point. However, Contractor and Sultangazi Municipality should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases.

Sultangazi Municipality official who will manage the GM will be knowledgeable about the guidelines prepared by the WB to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in negative reactions from the community. It is highly important that the victims raising grievances involving these issues can do so anonymously. In addition, the authorities handling grievances should address such issues within confidentiality and with an unbiased approach and to ensure such grievances should be handled through a separate procedure. All stakeholders who have lodged a grievance may request that their applications be assessed in confidentiality. Sultangazi Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

6.3. Grievance Mechanism for Workers

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

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

² WB's ESSs: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

³

https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_uluslararası_projeler_sikayet_mekanizmasi_proseduru_1646748134.pdf

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

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

Sultangazi Municipality communication tools, the following communication channels can be used to convey complaints from workers:

- Grievance boxes will be placed at designated points within the construction sites, ensuring accessibility and confidentiality for workers to submit their grievances anonymously.
- Direct contact with site managers at construction sites will remain available for workers to voice their concerns. Site managers will be responsible for documenting and forwarding grievances to the relevant authorities.
- Meetings and formal/informal consultations will be conducted regularly to allow workers to express their grievances. These sessions will be structured to ensure confidentiality and prevent any potential reprisal against workers raising concerns.

The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms that will be placed in the containers. The responsible staff of Contractor will record all grievances that received at the construction site and convey to the sub-project GM officer for further action and resolution. It is important to note that sub-project employees will retain their right to access the public grievance mechanism for non-employment-related matters.

If any worker is not satisfied with the solutions offered by the E&S Team in Sultangazi Municipality PIU or requires further clarification at a higher level, they can submit their grievances or requests through the contact addresses provided below. Workers can confidentially submit grievances to their supervisor, the HR Department, or the E&S representative without fear of retaliation. All grievances will be handled with confidentiality and impartiality, ensuring fair and transparent resolution processes.

The detailed procedure of the labour grievance mechanism will be described in the Project specific LMP.

The officer appointed by Sultangazi Municipality for the Worker Grievance Mechanism will receive suggestions and complaints in writing with the Sample Grievance Form Annex E). Then, the actions taken, and the solution provided regarding the reported grievance will be recorded together with the Grievance Closure Form (Annex F). Thus, all activities carried out under the grievance mechanism will be recorded and care will be taken to establish a transparent relationship between workers and Sultangazi Municipality.

7. MONITORING AND REPORTING

7.1.Summary of how SEP implementation will be monitored and reported

Sultangazi Municipality will implement the monitoring activities throughout the lifetime of the subproject. This SEP will be updated upon receipt of feedback from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedback. In addition, SEP will be updated in case of major changes that may arise in the scope of the Sub-Project that may affect the stakeholder engagement activities. Apart from these, a summary of the implementation of the Grievance Mechanism (GM) will be published annually on the Sultangazi Municipality's website⁴ after removing the identity information of the persons to protect their identity. Monthly summaries of complaints, queries and related incidents, together with the status of implementation of corrective/preventive actions, shall be prepared by the Contractor during the construction phase and by Sultangazi Municipality during the operation phase. These summaries shall be included in the monthly ESMRs to be prepared by the Contractor during the construction phase of the subproject for submission to the Sultangazi Municipality. Furthermore, the Contractor shall promptly forward the complaints to the Subproject Owner in addition to summarizing them in the monthly ESMRs. The monthly summaries/reports shall be a means of assessing both the number and nature of complaints (if any) and the ability of Sultangazi Municipality and the Contractor(s) to address the complaints in a timely and effective manner. As for incidents, the Contractor shall be responsible for promptly reporting to the Subproject Owner any unexpected events such as

<https://www.sultangazi.bel.tr/>

environmental, social and labor issues or accidents, incidents or loss of time and maintaining an incident log on site throughout the life of the subproject.

Monthly ESMRs will be prepared by the Contractor for submission to Sultangazi Municipality. Quarterly ESMRs and six-monthly sub-project Progress reports will be prepared by Sultangazi Municipality and submitted to ILBANK together with the Complaint Register. Six-monthly ESMRs and sub-project Progress reports will be prepared by ILBANK for submission to WB. These reports will include a summary of the sub-project's performance in health, safety, environmental and social issues management, grievance mechanism and stakeholder engagement activities conducted within the specified period. All efforts for effective implementation of the GM will be documented using forms and records in the sub-project specific SEP and will be evaluated and reported against the specified KPI targets. It should also be noted that the personal information of the complainant using the GM will remain confidential and will never be shared in these reports.

The reporting process requirements and distribution of roles given in the Table 7.

Table 7. Reporting Process Requirements and Distribution of Roles

Responsible Party	Roles & Responsibility
PIU	- Oversee overall project implementation and compliance with national and WB standards. - Coordinate with stakeholders and ensure effective communication. - Review and approve reports submitted by the Construction Supervision Consultant and Contractor. - Conduct regular monitoring and evaluation of project activities.
Construction Supervision Consultant	- Monitor construction activities and ensure adherence to project specifications and standards. - Prepare and submit regular progress reports to the PIU. - Conduct site inspections and document findings. - Identify and report any deviations from the project plan or standards to the PIU.
Contractor	- Implement project activities according to the approved plan and schedule. - Maintain records of construction activities, materials used, and labor employed. - Submit daily/weekly progress reports to the Construction Supervision Consultant. - Address any issues or concerns raised by the Construction Supervision Consultant promptly.

7.1. Reporting back to stakeholder groups

During the Sub-project's development and construction phases, the construction contractors will prepare brief monthly reports on environmental and social performance for Sultangazi Municipality Management which will include an update on implementation of the stakeholder engagement plan and include indicators in this section. The monthly reports will be shared with ILBANK which will report quarterly to World Bank.

Sultangazi Municipality's Social Affairs Manager will report back to stakeholder groups, primarily through public meetings in sub-project affected municipalities and/or Neighborhoods. Minutes of meetings will be shared with the participants during subsequent public meetings. The summary will be published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data. Feedback received through the GM will be responded to in writing and verbally. Key sub-project updates will be posted on Sultangazi Municipality's website.

ANNEXES

Hata! Başvuru kaynağı bulunamadı.

Annex B- Photographs of Illegal Users in the Parcel

Annex D- Letter of Sultangazi Municipality Regarding the Structures Remaining in the Project Parcel

Annex E- Sample Grievance Submission Form

Annex F- Sample Grievance Closure Form

Hata! Başvuru kaynağı bulunamadı.

Hata! Başvuru kaynağı bulunamadı.

Annex A- Site Photographs







Annex B- Photographs of Illegal Users in the Parcel





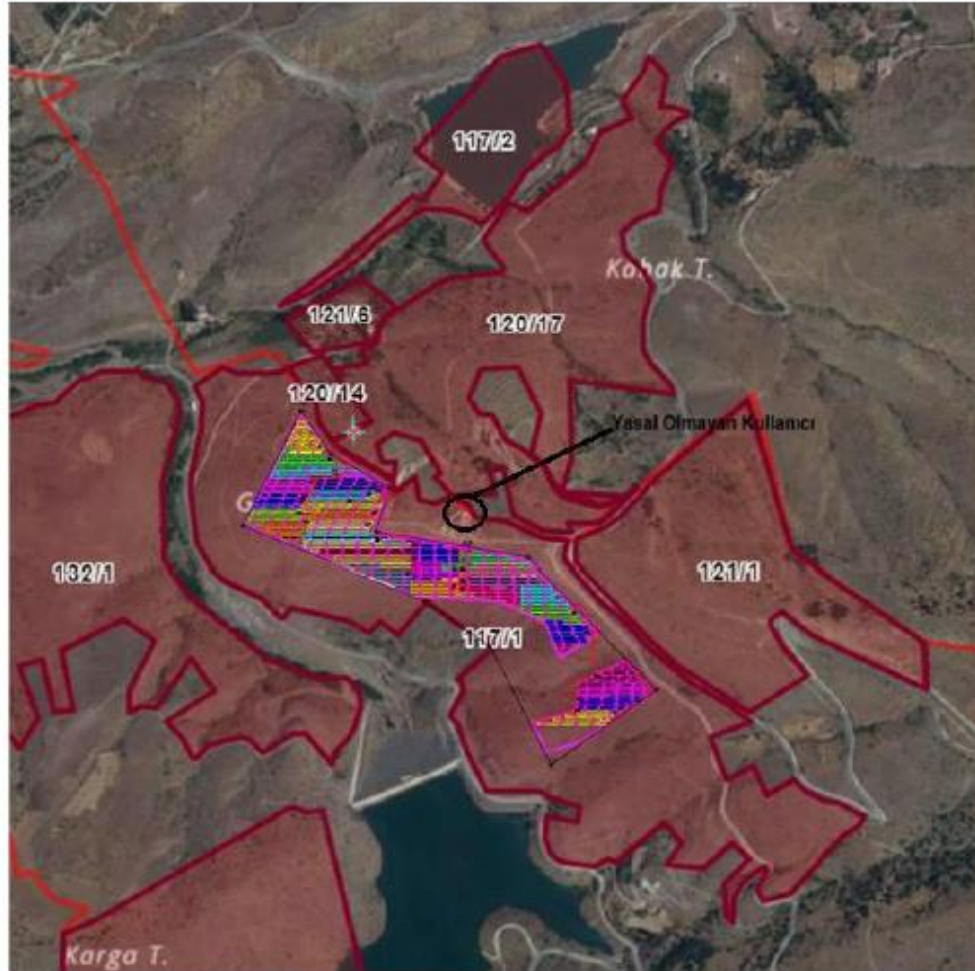
Annex C- Site Visit and Community Level Questionnaire Photographs



Annex D- Letter of Sultangazi Municipality Regarding the Structures Remaining in the Project Parcel

Malatya ili, Battalgazi ilçesi, Yaygın Mahallesi, 117 ada 1 parsel üzerinde Türkiye Kamu ve Belediye Yenilenebilir Enerji Projesi (PUMREP) kapsamında sağlanması planlanan finansman ile Sultangazi Belediyesi tarafından inşa edilecek Sultangazi Belediyesi Güneş Enerjisi Santrali (Alt Proje) ile ilgili yapılan çevresel ve sosyal değerlendirmelerde, söz konusu parsel üzerinde yasal olmayan kullanıcılar tarafından inşa edilmiş bir adet evin bulunduğu belirlenmiştir. Söz konusu parselin bu konutların sahiplerinin geçim kaynağı üzerinde herhangi bir etkisi bulunmamaktadır. Parsel içinde yaşayanların geçim kaynağının inşaat işiyle alakalı olduğu kendisinin bölgede herhangi bir tarımsal faaliyet veya hayvansal faaliyet göstermediği, bilinmektedir. Aynı şekilde, GES alanını herhangi bir faaliyet için kullanmadıkları taraflarından beyan edilmiştir. Ayrıca, bu konutlar alt proje kapsamında yıkılmayacak olup, istendiği takdirde mevcut sahipleri tarafından kullanılmaya devam edecektir. Şekil 1'de gösterildiği üzere güneş enerjisi panellerinin yerleştirileceği alan yasal olmayan kullanıcılar tarafından inşa edilmiş olan konutların kullanılmasına da engel olmamaktadır.

Şekil 1:



Sınıflandırma: Tasnif Dışı

Şekil 2 :



İnşa edilmesi planlanan güneş enerji santralinin gelecekte herhangi bir şekilde genişletilmesi planlanmamaktadır. Çizimlerde de açıkça gösterildiği üzere, santral alanında herhangi bir genişleme öngörülmemekte olup, bu durum alanda bulunan ve yasal olmayan kullanıcılar tarafından inşa edilmiş konutların kullanımını da engellememektedir. Bununla birlikte, Sultangazi Belediyesi, alt projenin bu konutları etkileyecek şekilde genişletilmesi ya da bu alt proje ile ilişkili başka bir tesisin yapılması durumunda — ve söz konusu tesisin “ilişkili tesis” olarak tanımlanması halinde — eğer bu yapıların zarar görmesi ya da yıkılması söz konusu olursa, inşaat çalışmalarına başlamadan önce Dünya Bankası’nın Çevresel ve Sosyal Çerçevesi (ESF) kapsamında yer alan ESS5 – Arazi Edinimi, Arazi Kullanım Kısıtlamaları ve Gönülsüz Yeniden Yerleşim standardına uygun bir Yeniden Yerleşim Planı hazırlanacağını ve bu Plan İller Bankası Proje Yönetim Birimi tarafından onaylandıktan sonra bu onaylanmış plana uygun olarak hareket edeceğini taahhüt eder.

Annex E- Sample Grievance Submission Form

Grievance Form

Turkish Version will be used at the SPP Site

Reference No	
Name – Surname <i>The complainant shall hold the right to remain anonymous. Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information</i>	
Please mark how you wish to be contacted	Please provide details for your preferred communication
E-mail	
Telephone	
Mail	
Other	
Province/Town/Settlement	
Date	
Category of the Grievance	
On assets/properties impacted by the Sub-project	
On infrastructure damages (roads , sewage system or water resources etc.)	
On decrease or complete loss of sources of income	
On environmental issues	
On employment process	
On traffic, transportation and other risks	
On Inappropriate behavior	
Other (Please specify):	

Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?
What would you like to see happen to resolve the problem?

Signature:

Date:

Annex F- Sample Grievance Closure Form

Grievance Close Out Form

Grievance closeout number:		
Define immediate action required:		
Define long term action required (if necessary):		
Compensation Required?	[] YES [] NO	
CONTROL OF THE REMEDIATE ACTION AND THE DECISION		
Stages of the Remediate Action	Deadline	and Responsible Institutions

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature of the Complainant

Title-Name-Surname and Signature of the
Representative of the Responsible
Institution/Company

Date..../..../....

Annex G Sample Grievance Log Form

No	Grievance Register Number	How Grievance is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Municipality/Utility Level, Regional)	Date of Grievance Received	Location of Grievance Received	Name of Person Receiving Grievance	Land Parcel # (If grievance is related to land)	Complainant Information					Project Component Related to Grievance	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Grievance Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
								Name/Surname	ID Number	Telephone/email	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken	
1																					

Annex H- Minutes of Public Participation Meeting

TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP)

SULTANGAZİ MUNICIPALITY
SOLAR POWER PLANT PROJECT
MINUTES OF THE PUBLIC PARTICIPATION MEETING

Revision :	REV.00
Meeting Date :	09.12.2025 – 14.00
Meeting Location :	Battalgazi Municipality Yaygın Neighborhood Cultural Center

These Minutes of the Public Participation Meeting have been prepared by Ardea Energy Technologies Ltd. Co. on behalf of İLBANK Inc. Under the PUMREP (Public and Municipal Renewable Energy Project), financed by the World Bank (WB) they may not be printed, photocopied, reproduced, and/or published by any means without the permission of İLBANK Inc. and Ardea Energy Technologies Ltd. Co.; nor may they be used for purposes other than those for which they were produced without prior authorization.

1. PUBLIC PARTICIPATION MEETING

The Sultangazi Municipality SPP Project constitutes a sub-project implemented under the financing of the Public and Municipal Renewable Energy Project (PUMREP), which aims to support sustainable development in cities across Türkiye. PUMREP, financed by the World Bank and implemented through İLBANK, represents a significant step toward developing sustainable energy solutions within the public sector and enhancing energy security. The Environmental and Social Management Plans (ESMP) prepared under the sub-project have been developed in accordance with the World Bank Environmental and Social Standards, Safeguard Policies, the World Bank General EHS Guidelines, Industry Sector Guidelines, and İLBANK's ESMP, as well as the applicable Turkish environmental and social legislation. In addition to these studies, a Public Participation Meeting was held on 09 December 2025 at 14:00 following the completion of the ESMP. Announcements regarding the meeting were published on the official website and in national and local newspapers; furthermore, brochures were posted in neighborhood mukhtar offices, on public notice boards, and in local mosques, coffeehouses, kiosks, and bakeries to ensure that residents were informed. On the day of the meeting, the Yaygın Neighborhood mukhtar was personally contacted and invited to attend; however, he stated that he was outside the neighborhood and therefore unable to participate.

1.1 Summary of Meeting

Within the scope of the Public Participation Meeting, representatives of Sultangazi Municipality and the consultant firm provided information regarding the sub-project. The meeting commenced with an opening speech during which general information on the sub-project was shared with the public. Subsequently, the social specialist of the Ardea Energy Technologies Team emphasized the importance of the sub-project and noted that it is being implemented under PUMREP with financing from the World Bank. It was stated that, in terms of renewable energy and combating climate change, this sub-project represents an important step for Sultangazi. It was explained that, through the Solar Power Plant (SPP) project, a significant portion of Sultangazi's energy costs will be met using clean energy. The planned timeline of the sub-project was also communicated, indicating that the project is expected to be completed within 12 months. Following the presentation delivered by the social specialist of the Ardea Project Consultancy Team, the sub-project was introduced and information regarding the Environmental and Social Management Plan (ESMP) was provided. The purpose and importance of the Public Participation Meeting were explained to the attendees. Information was given on Solar Power Plants, and it was stated that as no sufficiently large, publicly owned, and technically suitable land was available within İstanbul for the installation of an SPP, a public land parcel in Malatya Battalgazi, allocated by the General Directorate of National Real Estate, was selected for the project. The location of the sub-project site and the technical details of the installation were clarified. Within the scope of the ESMP, the environmental and social risks of the sub-project were assessed, and analyses of the current conditions including land geography, climate characteristics, vegetation, natural and cultural assets, as well as risks related to natural disasters such as floods and earthquakes were shared with the public. Possible environmental and social impacts that may occur within the project area and its surroundings, along with the mitigation measures to be taken, were explained. It was emphasized that by utilizing renewable energy sources, the sub-project will contribute to combating climate change and may offer future opportunities

3



for local residents. It was also noted that the construction and operation phases may create opportunities for local employment and that the sub-project represents an important step toward enhancing the renewable energy potential of the region.

It was also stated that the grievance mechanism will be given due importance during both the construction and operation phases of the sub-project, and that this mechanism will be operated effectively. Information was provided regarding the purpose and functioning of the grievance mechanism, as well as the protocol established between Sultangazi Municipality and Battalgazi Municipality. The grievance channels and the procedures for submitting a complaint were explained to the participants in a transparent manner.

1.2 Question & Answer Session

In this subsection, the questions, requests, and comments raised by participants during the Public Participation Meeting, along with the corresponding responses, are presented. The details are as follows:

1. Resident, Yaygın Neighborhood:

Will any road improvements be carried out under the project?

Response of the Consultant Company Representative:

The main access roads of Yaygın Neighborhood are paved and in good condition; however, if deemed necessary during the construction phase, internal road improvement works within the project area will be carried out by the municipality.

2. Resident, Yaygın Neighborhood:

What will happen to the panels and the project site after 30 years?

Response of the Consultant Company Representative:

The panels, inverters, and other technical equipment on the site will be dismantled in accordance with environmental standards, and recyclable components will be sent for recycling. As no substantial concrete works are planned within the project site, significant land degradation is not expected. It is anticipated that, following the dismantling works, the land will naturally regenerate and may be reused.

3. Resident, Yaygın Neighborhood:

There used to be a spring water source within the project area; can this spring water be diverted elsewhere?

Response of the Municipality Representative:

No spring water source was identified within the area during the conducted surveys; however, should such a situation be encountered during the construction phase, the necessary measures will be taken.

4



1.3 Meeting Outcome

The Public Participation Meeting held within the scope of the project carried out in cooperation with Sultangazi Municipality was attended by the Deputy Mayor of Sultangazi Municipality, representatives of Battalgazi Municipality, the consultant representative, and local residents, with a total of 12 participants, and lasted 45 minutes. During the meeting, the purpose of the sub-project, its technical details, its environmental and social impacts, and the benefits it will provide to the public were explained in detail, with particular emphasis on the mitigation measures to be implemented during the construction and operation phases. Questions raised by the participants were answered by the project team, and the suggestions and opinions of the public were carefully listened to and recorded. At the end of the meeting, information was provided regarding the subsequent stages of the sub-project, and the communication channels available to the public throughout the process were shared.

5



2. Participation List

Picture 1: Participant Signature List

PAYDAŞ KATILIM TOPLANTISI KATILIMCI LİSTESİ

Toplantı Konusu: Kamu ve Belediye Yenilenebilir Enerji Projesi (KABYEP) Sultangazi Belediyesi GES Projesi Paydaş Katılım Toplantısı

Toplantı Yeri / Tarihi: Battalgazi Belediyesi Yıygın Mahallesi Kültür Merkezi 09.12.2025 - 14:00

Katılımcılar:

Sıra No	İsim	Muslek	Temsil Ettigi Kurum / Yürürlük	Telefon	İmza
1	Yeter Arzu Bulut		Yeter Arzu Bulut		
2	Çiftçi		Yeter Arzu Bulut		
3	Yeter Arzu Bulut		Yeter Arzu Bulut		
4	Yeter Arzu Bulut		Yeter Arzu Bulut		
5	Yeter Arzu Bulut		Yeter Arzu Bulut		
6	Yeter Arzu Bulut		Yeter Arzu Bulut		
7	Yeter Arzu Bulut		Yeter Arzu Bulut		
8	Yeter Arzu Bulut		Yeter Arzu Bulut		
9	Yeter Arzu Bulut		Yeter Arzu Bulut		
10	Yeter Arzu Bulut		Yeter Arzu Bulut		
11	Yeter Arzu Bulut		Yeter Arzu Bulut		
12	Yeter Arzu Bulut		Yeter Arzu Bulut		
13	Yeter Arzu Bulut		Yeter Arzu Bulut		
14	Yeter Arzu Bulut		Yeter Arzu Bulut		
15	Yeter Arzu Bulut		Yeter Arzu Bulut		
16	Yeter Arzu Bulut		Yeter Arzu Bulut		
17	Yeter Arzu Bulut		Yeter Arzu Bulut		



3. Annexes

Annex 1: Pictures of Public Participation Meeting

Picture 2: Pictures of Meeting



7



¹ Due to a power outage in Yaygın Neighborhood on the day of the meeting, the presentation could not be projected; however, the necessary sections were shown to the participants directly from the computer.

8





9



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE
İKLİM DEĞİŞİKLİĞİ BAKANLIĞI



İLBANK



SULTANGAZI



ARDEA
ENERGY TECHNOLOGIES INC. CO.

Annex 2: Newspaper Announcements

Picture 3: PPM Published in Hürriyet Newspaper



10



Picture 4: PPM Invitation Published in Malatya Son Mersin Newspaper



11



Picture 5: PPM Invitation Published in Milliyet Newspaper's Website

İLNO234681 numaralı ilan INT-000184-www.milliyet.com.tr yayınında 30.11.2025 tarihinde yayınlanmıştır.



12



Annex 3: Documents and Announcements Related to the ESMP Published on the Official Websites of Sultangazi Municipality and Battalgazi Municipality

Picture 6: ESMP Documents Published on the Official Website of Sultangazi Municipality

The screenshot shows the official website of Sultangazi Municipality. The header includes the municipality's name, logo, and contact information. The main content area features a public notice titled "TÜRKİYE KAMU VE BELEDİYE YENİLENEBİLİR ENERJİ PROJESİ" (Turkey Public and Municipal Renewable Energy Project). The notice is dated 26 Kasım (November 26) and is a public participation meeting ("Halkın Katılımı Toplantısı"). The meeting is organized by the Ministry of Environment, Urbanization and Climate Change, in cooperation with the Ministry of Energy. The project is a public and municipal renewable energy project (PUMREP) in the Sultangazi district of Malatya. The notice provides information about the project's goals, the role of the municipality, and the public participation process. It also includes contact information for the project owner (Sultangazi Municipality) and the ESMP consultant (ARDEA). The footer of the website displays logos of the World Bank, the Ministry of Environment, Urbanization and Climate Change, the Ministry of Energy, and ARDEA.

DUYURULAR
ANA SAYFA > DUYURULAR

GÜNCEL

- HABERLER
- ETKİNLİKLER
- DUYURULAR
- İHALE DUYURULARI

26 KASIM TÜRKİYE KAMU VE BELEDİYE YENİLENEBİLİR ENERJİ PROJESİ

Halkın Katılımı Toplantısı

Dünya Bankası tarafından finanse edilerek İller Bankası A.Ş.(İLBANK) aracılığıyla yürütülen "Türkiye Kamu ve Belediye Yenilenebilir Enerji Projesi" kapsamında, Sultangazi Belediyesi tarafından "Sultangazi Belediyesi Güneş Enerji Santrali Projesinin", yapılması ve işletilmesi planlanmaktadır. Söz konusu altproje için aşağıda belirtilen tarih ve saatte faaliyetle ilgili halkı bilgilendirmek, görüş ve önerilerini almak için "Halkın Katılımı Toplantısı" yapılacaktır.

Altproje kapsamında çevresel ve sosyal etkiler oluşabileceğinden, bu etkilerin yönetimi amacıyla Alt Proje'ye özel Çevresel ve Sosyal Yönetim Planı (ÇSYP) ile Paydaş Katılım Planı (PKP) hazırlanmıştır. Söz konusu planlar, Sultangazi Belediyesi'nin ile altprojenin uygulanacağı yer olan Battalgazi Belediyesi'nin resmi internet sitelerinde kamuoyunun erişimine açılmıştır.

Toplantı Bilgileri:

- **Toplantı Yeri:** Battalgazi Belediyesi Yaygın Mahallesi Kültür Merkezi
- **Toplantı Yerinin Adresi:** Yaygın Mahallesi Güven Sokak No: 15 – Battalgazi / MALATYA
- **Toplantı Tarihi ve Saati:** 09/12/2025 -- Saat: 14:00

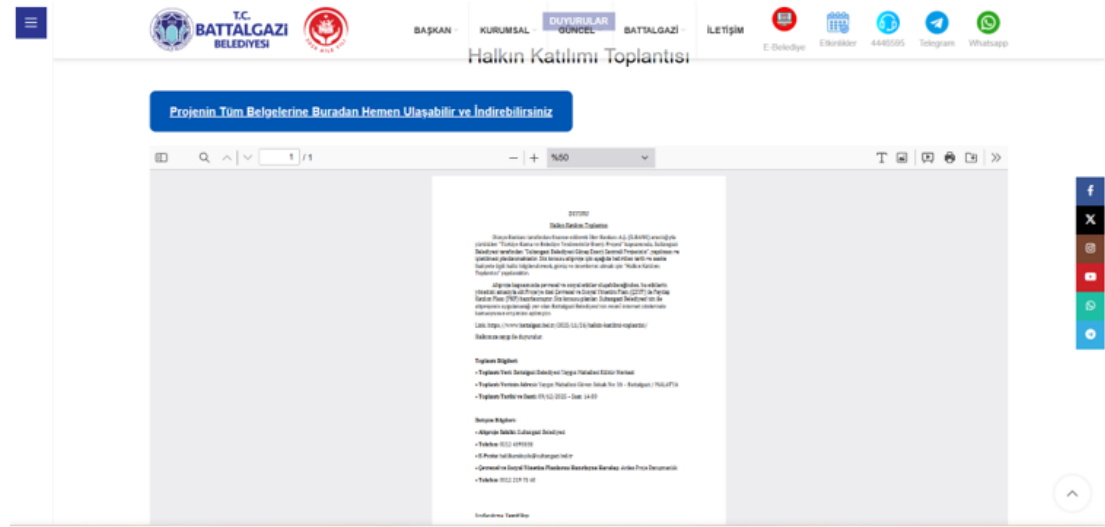
İletişim Bilgileri:

- **Altproje Sahibi:** Sultangazi Belediyesi
- **Telefon:** 0212 4593535
- **E-Posta:** halilkarakuslu@sultangazi.bel.tr
- **Çevresel ve Sosyal Yönetim Planlarını Hazırlayan Kuruluş:** Ardea Proje Danışmanlık
- **Telefon:** 0312 219 75 40

GES DUYURU METNİ İLBANK içeriğine buradan ulaşabilirsiniz
TÜRKİYE KAMU VE BELEDİYE YENİLENEBİLİR ENERJİ PROJESİ (PUMREP) içeriğine buradan ulaşabilirsiniz
You can access the TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP) content here
TÜRKİYE KAMU VE BELEDİYE YENİLENEBİLİR ENERJİ PROJESİ (PUMREP) içeriğine buradan ulaşabilirsiniz
You can access the You can access the TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP) content here content here
Sultangazi Belediyesi GES Brosür içeriğine buradan ulaşabilirsiniz
You can access the Sultangazi Municipality SSP Brochure content here

İLGİLİ BİRİM Destek Hizmetleri Müdürlüğü

Picture 7: ESMP Documents Published on the Official Website of Battalgazi Municipality



Annex 4: Sultangazi Municipality SPP Public Participation Meeting Brochure

15



Ayrıca ÇSYF potansiyel proje etkilerinin yönetimi için geliştirilen önlem ve kontrolleri tanımlamakta, bu etki azaltma önlemlerinin uygulanma takvimini belirlemekte, ÇSYF'nin uygulanmasında rol ve sorumlulukları ile Dünya Bankası gerekliliklerine uygun olarak raporlama ve izleme gerekliliklerini tanımlamaktadır.

İzleme gereklilikleri de ÇSYF kapsamındaki izleme tablolarında tanımlanarak sunulacaktır. Buna göre projenin inşaat aşamasında, toz emisyonları, hava kirliliği, inşaat sırasında ve geçici trafik yükünden oluşacak gürültü, atık üretimi, iş sağlığı ve güvenliği, işletme aşamasında ise kimyasalların depolanması ve kullanımı, santralin yanısıra ve parlama etkisi, geçim kaynakları, şikâyetler, topluluk çatışmaları, paydaş katılımı, iş sağlığı ve güvenliği ve ilgili parametreleri ÇSYF'de ve PKP'de belirlenen şartlara uygun izlenecektir.

Alt projenin Etki Alanı; Yaygın, Tokluca ve Beydağ Mahallelerini içerecek şekilde belirlenmiştir. Etki alanının belirlenmesi hem çevresel hem de sosyal risklerin kapsamlı şekilde değerlendirilmesini ve tüm potansiyel etkilerin topluluklar ile çevresel aktörler için uygun önleme ve izleme planlarının tasarlanmasını sağlamaktadır. Projenin bilgilendirilmesi ve duyurulması aşamasında Sultangazi Belediyesi'nin resmi iletişim kanallarına ek olarak, Malatya'da yerel olarak erişilebilir araçlar kullanılacaktır. Battalgazi Belediyesi resmi web sitesinde de alt-proje dokümanları paylaşılabilecektir.

Çevresel ve Sosyal Yönetim Planı (ÇSYF) ve Paydaş Katılım Planı (PKP)'nin uygulanmasında sorumlu ana kurum, Alt-projenin inşaatından ve işletme aşamalarından da sorumlu olan Sultangazi Belediyesi'dir. Alt-projenin farklı aşamalarında çeşitli taraflar (Yükleniciler, Müşavir firma, Proje Uygulama Birimi, İLBANK vb.) ÇSYF ve PKP kapsamında çeşitli konularda sorumluluk alacaklardır. Sözü edilen tüm çalışmalar Sultangazi Belediyesi tarafından koordine edilecektir. Alt-proje dokümanları Sultangazi Belediyesi ve Battalgazi Belediyesi'nin internet sitesi üzerinden yayınlanacak ve talep edilmesi halinde bu dokümanlar Sultangazi Belediyesi tarafından paylaşılacaktır.

Sultangazi Belediyesi, Alt-projeyle ilişkin bilgi paylaşımı için Paydaş Katılım Planı hazırlamış, halkın görüş, öneri ve şikâyetlerini iletebileceği bir Şikâyet Mekanizması kurmuştur.

ŞİKAYET MEKANİZMASI

Alt proje özelinde kurulacak Şikâyet Mekanizması'nın İletişim kanalları aşağıda yer almaktadır. Sultangazi Belediyesi'nin İletişim kanalları haricinde, vatandaşlardan ve alt proje çalışanlarından gelecek şikâyetler, İLBANK'ın İletişim kanallarından veya CİMER ile YİMER üzerinden de iletebilir.

Sultangazi Belediyesi Şikâyet Mekanizması

Telefon: 444 23 32

E-mail: cagri@sultangazi.bel.tr

İLBANK Şikâyet Mekanizması

Web Sitesi/Uluslararası İlişkiler Bilgi Edinme Başvuru Formu: www.ilbank.gov.tr/form/bilgiedinmeuluslararası

E-posta: uydubdei@ilbank.gov.tr

uydubdei@ilbank.gov.tr

Tel: +90 312 508 79 79 /

CİMER

- Web sitesi: www.cimer.gov.tr
- Çağrı merkezi: 150
- Telefon numarası: 0312 590 20 00

YİMER

- Web Sitesi: www.yimer.gov.tr
- Çağrı Hattı: 157
- Telefon: +90 312 515 71 22

TÜRKİYE KAMU ve BELEDİYE YENİLENERİLİR ENERJİ PROJESİ

Sultangazi Belediyesi Güneş Enerjisi Santrali Projesi

Halkın Katılımı Toplantısı Bilgilendirme Broşürü

Tarih: 9 Aralık 2025

Saat: 14.00

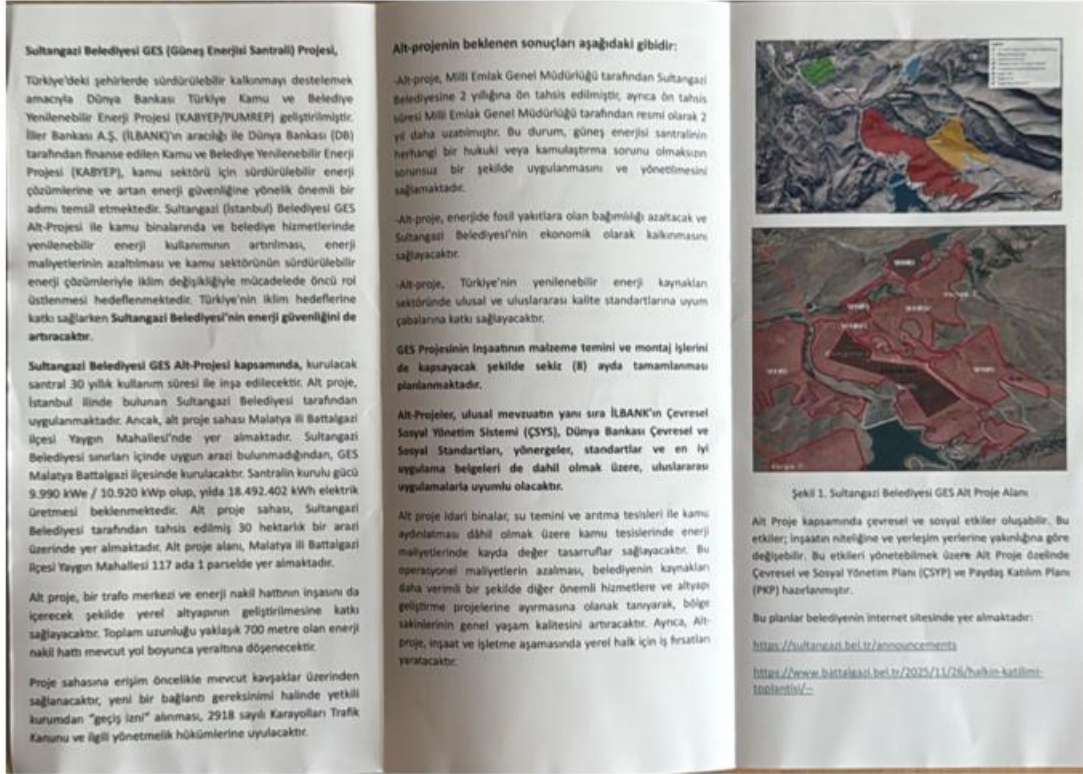
Yer: Battalgazi Belediyesi Yaygın Mahallesi Kültür Merkezi

(Yaygın Mahallesi Güven Sokak No: 15 – Battalgazi / MALATYA)

THE WORLD BANK, T.C. ÇEVRE, ŞEHİRCİLİK VE KLİM BAKANLIĞI, İLBANK, SULTANGAZI BELEDİYESİ, ARDEA ENERGY TECHNOLOGIES INC. CO.

16





17

Annex 5: Presentation Delivered to the Public During the Public Participation Meeting

Türkiye Kamu ve Belediye Yenilenebilir Enerji Projesi (KABYEP)/(PUMREP)

Sultangazi Belediyesi
10,92 MWp / 9,9 Mwe KAPASİTELİ GÜNEŞ ENERJİSİ SANTRALİ
HALKIN KATILIM TOPLANTISI

Proje Yürütücüsü



Proje Uygulayıcısı



Proje Finansörü

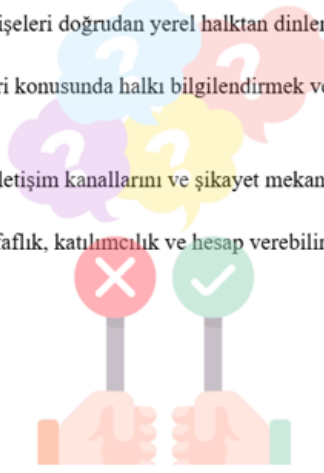


18



Halkın Katılım Toplantısının Amacı

- Alt projenin amacı, kapsamı ve uygulanacağı alan hakkında halkı doğru ve açık şekilde bilgilendirmek.
- Proje ile ilgili görüş, öneri ve endişeleri doğrudan yerel **halktan** dinlemek ve kayıt altına almak.
- Projenin sosyal ve çevresel etkileri konusunda halkı bilgilendirmek ve olası etkileri en aza indirmek için alınacak önlemleri paylaşmak.
- Proje süresince halkın haklarını, iletişim kanallarını ve **şikayet** mekanizmasını tanıtmak.
- Belediyenin ve proje ekibinin şeffaflık, **katılımcılık** ve **hesap** verebilirlik yaklaşımını vurgulamak.



19



THE WORLD BANK



Güneş Enerjisi Santralleri

- GES, güneş ışığını elektriğe çeviren temiz ve sessiz bir enerji üretim sistemidir.
- Toprağa, suya, havaya zarar vermez; kimyasal atık üretmez.
- Gürültü oluşturmaz, koku yaymaz.
- İnsan sağlığına veya hayvanlara olumsuz bir etkisi yoktur.
- Paneller yerden yüksektir; çevreye radyasyon yaymaz.
- Proje alanı sadece panel kurulu alanla sınırlıdır; çevrede hayvancılık ve günlük yaşam normal şekilde devam eder.



20



THE WORLD BANK



Proje Sahası ve Detayları



Konum:
Malatya / Battalgazi
Yaygın Mahallesi

117 Ada / 1 Parsel

Parsel Büyüklüğü
447.399,72 m²

Proje Alanı
300.000 m²

Proje Alanı ve Parsel Sınırları



22



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE
İKLİM DEĞİŞİKLİĞİ BAKANLIĞI



İLBANK



SULTANGAZİ
ELEKTRİK



ARDEA
ENERGY TECHNOLOGIES INC. CO.

GES Proje Alanı

Projenin Sahibi Sultangazi Belediyesi

- Bu GES projesi, Türkiye çapında belediyelerin temiz enerji üretmelerini destekleyen bir Dünya Bankası programının parçasıdır.
- Program gereği her belediye kendi enerji ihtiyacını karşılamak, enerji giderlerini azaltmak ve çevresel sürdürülebilirliğe katkı sağlamak için GES yatırımı yapabilir.

Neden GES Malatya’da Yapılıyor?

- İstanbul’da uygun büyüklükte, kamuya ait ve teknik olarak GES kurulmaya elverişli boş arazi bulunmadığından, proje için Milli Emlak tarafından tahsis edilen Malatya Battalgazi’deki kamu arazisi seçilmiştir.
- Yani arazi devlet tarafından resmî olarak Sultangazi Belediyesi’ne tahsis edilmiştir.



GES Proje Alanı

Projenin Bölgeye Sağlayacağı Kamu Yararı

- GES, tamamen yenilenebilir ve temiz enerji üretir.
- Fosil yakıt kullanılmadığı için hava kirliliği oluşturmaz, gürültü ve koku yaymaz.
- Bölgedeki çevresel yükü artırmaz, yaşam kalitesini olumsuz etkilemez
- İnşaat ve işletme aşamalarında yerel işgücüne öncelik verilecektir.
- Güvenlik, bakım-onarım, temizlik, nakliye gibi hizmetlerde bölgedeki firmalara iş imkânı sağlanacaktır.
- Bu projeye bölgede yenilenebilir enerji yatırımlarına yönelik uzmanlık, tecrübe ve yeni iş alanları oluşacaktır.
- Proje, Battalgazi için yenilenebilir enerji potansiyelinin değerlendirilmesi açısından bir başlangıçtır.
- Altyapı gelişimi, ulaşım yollarının iyileştirilmesi ve bölgenin tanınırlığı artacaktır.
- Bu sayede gelecekte bölgeye daha fazla temiz enerji ve kalkınma projesi gelebilir.

GES Proje Özeti

Kapasite

Fotovoltaik Panel
Kurulu Güç: 10.920 kWp
Bağlantı gücü: 9.990 kWe
Yıllık elektrik üretimi:
18.492.402 kWh

Uygulama Programı

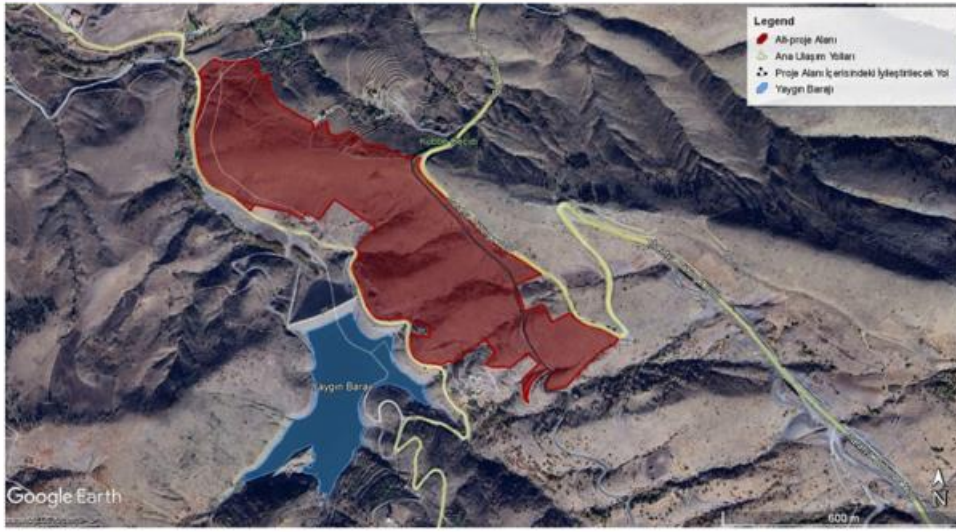
Projenin inşaat süresinin 12 ay olması planlanmaktadır.
Projenin işletme süresi 30 yıl olacaktır.

İş Gücü Gereksinimleri

Aşama	İşçi Sayısı (yüklenici ve alt yükleniciler dâhil)	Planlanan Konaklama Düzenlemesi
İnşaat İşçileri (zirve dönemi)	30	Saha içi geçici konaklama (işçiler için prefabrik kamp veya geçici tesisler)
İşletme İşçileri (zirve dönemi)	4	Saha dışı konaklama (sahada kalıcı konut yok, işçiler ihtiyaç halinde gidip gelecektir)



GES Proje Alanı Eriřim Yolu



26



THE WORLD BANK



T.C. EVRE,   N  L  K VE
İKLİM DEĞİŐ KL  K BAKANLIĐI



iLBANK



SULTANGAZİ
BELEDİYESİ



ARDEA
ENERGY TECHNOLOGIES INC. CO.

Alt-proje Etki Alanı

- Alt-proje etki alanı, güneş enerji santralının doğrudan veya dolaylı olarak etkileyebileceği alanları ifade eder.
- Bu etkiler inşaat sırasında oluşabilecek gürültü, trafik hareketliliği, toz, arazi kullanım değişiklikleri gibi unsurlardan kaynaklanabilir.

Etki Alanı İçerisindeki Mahalleler

Mahalle	Proje Alanına Uzaklık	Potansiyel Etki	Değerlendirme Sonucu
Yaygın Mahallesi	700 m	En yakın yerleşim	Doğrudan etkiler kontrol altında; gürültü & toz limitlerin uyulacak.
Tolkuca Mahallesi	1,35 – 2 km	Gürültü, toz, trafik	Etki düşük
Beydağı Mahallesi	2,35 km	Sosyo-ekonomik & ulaşım	Etki düşük
Yaygın Göleti & Barajı	Yakın konum	Su kaynakları	Proje suyu doğrudan kullanmıyor; kirlilik riski yok

Alt-proje Etki Alanı



28



Çevresel ve Sosyal Etkiler / Önlemler

1. Gürültü

Alınacak Önlemler:

- Çalışmalar mesai saatleri arasında yapılacaktır.
- Proje parseli içerisindeki gayriresmi kullanıcı dikkate alınarak çalışmalar sırasında gürültü sınırlarına uyulacaktır.

3. Toprak ve Arazi Kullanımı

Önlemler:

- Sadece GES kurulacak alan çevrili olacak olup, proje parseli içerisindeki diğer alalar kullanılabilir.
- Arazide kalıcı bir bozulma olmayacaktır.

2. Toz ve Hava Kalitesi

Alınacak Önlemler:

- Şantiye yolları düzenli sulanacaktır.
- Rüzgarlı havalarda toz kontrolü arttırılacaktır.

4. Su Kaynakları (Yaygın Göleti & Yaygın Barajı)

Önlemler:

- Kimyasallar sızdırmaz, kapalı depolarda tutulacaktır.
- Proje, su kaynaklarıyla fiziksel temas kurmamaktadır.
- Atık sular yönetmeliklere uygun şekilde bertaraf edilecektir.



Çevresel ve Sosyal Etkiler / Önlemler

5. Biyoçeşitlilik ve Doğal Yaşam Önlemler:

- Proje alanı, önemli bir bitki örtüsünün veya doğal habitatın bulunduğu bir bölgede yer almamaktadır; bu nedenle Alt Proje faaliyetlerinden kaynaklanacak etkilerin düşük olması beklenmektedir

6. Trafik ve Ulaşım Önlemler:

- Şoförlere güvenli sürüş eğitimi verilecektir.
- Trafiğin yoğun olduğu saatlerde nakliye yapılmayacaktır.
- Toz azaltımı için yollar sulanacaktır.

7. Şikayet Mekanizması Önlemler:

- Sultangazi Belediyesi, Battalgazi Belediyesi, İLBANK, CİMER ve YİMER kanalları aktif olarak kullanılacaktır.
- Şikayetler 7-15 gün içinde değerlendirilecektir.
- Süreç tamamen şeffaf ve izlenebilir olacaktır.

30



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE İKLİM DEĞİŞİKLİĞİ BAKANLIĞI



İLBANK



SULTANGAZI BELEDİYESİ



ARDEA
ENERGY TECHNOLOGIES INC. CO.

Şikayet Mekanizması

1. Ne işe yarıyor?

- Proje ile ilgili şikâyet - talep - öneri - görüş bildirmek isteyen herkes için ücretsiz ve erişilebilir bir sistemdir.
- Amaç: Sorunları hızlı çözmek, halkı bilgilendirmek ve projenin her aşamasında güveni artırmak.
- Türkçe bilmeyen ya da okuma-yazma bilmeyen kişiler de yardım alarak başvuru yapabilir.

2. Kimler başvuru yapabilir?

- Mahalle sakinleri
- Arıcılar, hayvancılıkla uğraşanlar
- Proje çalışanları
- Etkilenen tüm topluluklar
- İsteyen herkes adıyla veya isimsiz (anonim) başvuru yapabilir.

3. Nasıl şikâyet / başvuru yapabilirim?

- Sultangazi Belediyesi Çözüm Merkezi: 444 23 32 / Battalgazi Belediyesi Çözüm Merkezi: 4446595
- İLBANK: +90 312 508 79 79
- CİMER: 150
- YİMER (yabancılar için): 157

31



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE İKLİM DEĞİŞİKLİĞİ BAKANLIĞI



İLBANK



SULTANGAZI BELEDİYESİ



ARDEA
ENERGY TECHNOLOGIES INC. CO.

Şikayet Mekanizması

3. Nasıl şikâyet / başvuru yapabilirim?

İnternet Üzerinden

- Sultangazi Belediyesi Şikâyet Sistemi:

(<https://butce.sultangazi.bel.tr/WebBasvuru/istekvesikayet-web/>)

- Battalgazi Belediyesi Şikâyet Sistemi

(<https://vatandas.battalgazi.bel.tr/>)

- CİMER: www.cimer.gov.tr

- YİMER: www.yimer.gov.tr

- İLBANK: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararası>

4. Yazılı Başvuru

- Dilekçe bırakarak
- Muhtarlar aracılığıyla
- Toplantılarda sözlü olarak
- Kurulacak şikâyet kutuları ile





Katılımınız ve İlginiz İçin Teşekkür Ederiz.



34



Annex 6: PPM Announcements



35



36





37



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE
İKLİM DÜŞÜKLÜĞÜ BAKANLIĞI



İLBANK





38



39





40



THE WORLD BANK



T.C. ÇEVRE, ŞEHİRCİLİK VE
İKLİM DÜŞÜNLÜĞÜ BAKANLIĞI



İLBANK



SULTANGAZI
BELEDİYESİ



ARDEA
ENERGY TECHNOLOGIES INC. CO.