

MINISTRY OF ENERGY AND NATURAL RESOURCES

STAKEHOLDER ENGAGEMENT PLAN (SEP)

FOR

EUROPEAN UNION / INSTRUMENT FOR PRE-ACCESSION ASSISTANCE 2019 ENERGY SECTOR PROGRAM – PHASE 4 PROJECT (P179235)

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1. EXECUTIVE SUMMARY

The purpose of this Stakeholder Engagement Plan (SEP) is to identify the project stakeholders and their influence and interest levels throughout the project. It also serves for the development of a communication strategy between all the relevant stakeholders, for their effective and inclusive engagement throughout the project cycle and providing them full information about the project, hearing out their concerns and views on potential risks and impacts of the project.

The main stakeholder of the project is the Directorate General of Energy Affairs (DGEA) of the Ministry of Energy and Natural Resources (MENR) as the beneficiary institution. DGEA is responsible for conducting measurements for the determination and evaluation of all energy resources, primarily renewable energy resources, and preparing feasibility and sample application projects and therefore is identified as the only direct affected party. In addition, marine users, private sector representatives and relevant NGOs are considered as direct affected parties as their daily activities may be influenced by the project activities. The indirect affected parties are Petroleum Pipeline Corporation (BOTAŞ), Turkish Petroleum Corporation (TPAO), Energy Market Regulatory Authority (EMRA) and Turkish Electricity Transmission Corporation (TEİAŞ) whose activities will be affected during the implementation of the downstream investments to be decided according to the outcome of the project.

The SEP has been published on MENR's website both in English and Turkish between 8-17 March 2023 to inform the stakeholders about the Project activities and the stakeholder engagement process. An online meeting was organized on 16 March 2023 with the participation of nearly 70 people from relevant governmental institutions, NGOs, universities and private sector. The participants were informed about the potential risks and impacts of the project and also about the SEP. All the stakeholders expressed their intentions to be involved in the stakeholder engagement activities and they want to be consulted on related critical issues during the project implementation stage.

The stakeholder engagement will rely more on online channels. Where possible and appropriate, online platforms and dedicated discussion groups will be created appropriate for this purpose, depending on the type and category of stakeholders. Traditional communication channels (like TV, newspapers, radio, public announcements, and mail) will be used when stakeholders do not have access to online channels. Materials like project documents, presentations, questionnaires, and discussion topics will be distributed online to participants.

The Project implementation unit (PIU) of MENR will be responsible for the successful implementation of the SEP and will be monitoring the progress as well as the reporting of feedbacks and grievances received.

2. INTRODUCTION

Türkiye's 11th Development Plan for 2019-2023 sets out the longer-term structural reforms to be pursued in order to address Türkiye's development challenges, such as improving productivity and tackling energy supply security to ensure sustained growth and building the skills of its population to reap the benefits of greater global integration. The Plan aims to provide roots for a more sustainable and green energy transition through (i) increasing the share of renewables in generation to 38.8% in 2023 from 32% in 2018; (ii) development of measures to reduce carbon emissions, with additional measures such as energy efficiency (EE) gains and increase in forest assets; (iii) increasing electricity production from renewable energy (RE) sources and necessary planning for integration of RE generation into the grid; (iv) incorporating energy storage systems, including pumped-hydro, which will be installed in order to eliminate the constraints of increasing RE on the grid; (v) increasing the number of buildings that are more efficient and that can generate their own energy; and (vi) incentivizing EE in existing buildings.

Demand for energy and natural resources has been increasing due to the economic and population growth in Türkiye. It has posted the fastest growth in the OECD, with an annual growth rate of 5.5 percent since 2002. Since then, Türkiye's primary energy supply has increased from 78.4 Mtoe to 147 Mtoe, almost a two-fold increase within 19 years. Türkiye's growing economic performance has also been reflected on the country's electricity generation infrastructure given the dramatic rise in the total installed capacity from 31.8 GW to 103.8 GW at the end of 2022, and in the electricity consumption from 132.6 TWh to 328.7 TWh as of end-2022. According to MENR's reference scenario, electricity consumption is expected to rise by 4.8% annually and reach to 375.8 TWh in 2023. To satisfy the increasing needs of the country, the current capacity is expected to reach 110 GW by 2023 through further investments to be commissioned by the private sector as underlined in the 11th Development Plan for 2019-2023.

Türkiye's policy and strategy for the renewable energy sector until 2023 are outlined in the National Renewable Energy Action Plan (NREAP). According to the Plan, by 2023, 30% of Türkiye's electricity needs will be provided by RE technologies, increasing the total renewable installed capacity to about 60 GW. If the trajectory of the electricity generation mix up until 2030 confirms NREAP's estimates of 50% RE and 14% local lignite, the amount of electricity supplied from imported fuels would decline to 1.6 TWh per year, pointing to a total saving on energy imports of 0.6 TWh per year. Following the recent developments in the Turkish renewable energy sector and as a follow up to the targets set forth in NREAP, it is necessary to use the untapped potential of other renewable resources such as offshore wind energy.

Moreover, Türkiye announced the National Energy Plan in 2022 which aims to both support economic growth and take the country's green energy transformation to the next level in order to meet the net zero targets until 2053. Accordingly, Türkiye will reach a total of 187.7 GW of installed capacity by 2035 and 74% of which will consist of renewables. The Plan also includes the target to install a total of 5 GW offshore wind capacity by 2035. Therefore, Türkiye is expected to significantly increase its investments in renewable energy in the upcoming period.

Within this framework, Türkiye plans to tap the offshore wind energy potential by virtue of determination of eligible sites and launch of auctions/tenders/competitions for offshore wind energy generation. Accordingly, Türkiye already launched a tender for a 1.2 GW offshore wind project in June 2018. However, no application was received because of the lack of on-site

measurement data. To attract investors' interest in offshore wind in 2018, the MENR's Directorate General of Energy Affairs (DGEA) decided to focus on de-risking and increasing transparency for potential investors while initiating a new competitive tender in the future. To this end, the institutional capacity of DGEA requires assistance for conducting preparatory technical studies including geological and geotechnical surveys, meteorological and oceanographic analysis and measurements, techno-economic pre-feasibility studies, environmental/social constraints analysis and other technical reports. These will set the scene for site selection and announcement of competitions. Based on the outputs of this Project, should any site prove to be feasible, a new competition is planned to be prepared and announced consecutively.

2.1. Project Description

The Project will contribute substantially to Türkiye's plans to tap the offshore wind energy potential by virtue of determination of eligible sites and launch of auctions/tenders/competitions for offshore wind energy generation. It will contribute to de-risking and increasing transparency for potential bidders for competitions. Geological and geotechnical surveys, meteorological and oceanographic analysis and measurements, techno-economic pre-feasibility studies, environmental/social constraints analysis and other technical studies will be conducted under the Project which will set the scene for site selection and announcement of competitions.

On the other hand, the institutional capacity of DGEA will be enhanced by delivering trainings on preparatory technical studies including techno-economic pre-feasibility studies, environmental/social constraints analysis and other technical reports. As regards overall sustainability, the Project will provide valuable input for enhancement of institutional capacity of DGEA for offshore wind energy generation site selection and auction/tender/competition preparation and thereby improvement of investment potential for offshore wind energy generation in Türkiye.

2.2. Objective of the Stakeholder Engagement Plan

The overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the public institutions, private companies and non-governmental organizations are essential to the successful completion of the project by ensuring smooth collaboration among all stakeholders in order to minimize and mitigate environmental and social risks related to the proposed project activities.

Specific objectives of the SEP are detailed below:

- to identify direct and indirect stakeholders, and other interested parties and to develop and maintain a timely, continuous, accurate and transparent communication strategy and maintain a constructive relationship with all stakeholders through a well-organized approach, throughout the Project,
- to identify the nature of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social (E&S) mitigation measures,

- to promote and provide means for effective and inclusive engagement with stakeholders and other interested parties throughout the project life cycle on issues that could potentially create an impact,
- to provide stakeholders with full information of the project and potential E&S risks and impacts in a timely, understandable, accessible format
- to set out the structure of an accessible and inclusive grievance mechanism (GM) for the stakeholder and the public and allow MENR to respond to and resolve such grievances and issues raised.

3. REGULATIONS AND REQUIREMENTS

3.1. National Legislation for Stakeholder Engagement

Right to information is the right of the individuals to access the information included in the records of the public institutions and agencies. Turkish legislative framework on the right to information is composed of:

- Constitution of Republic of Türkiye
- Law No. 4982 on the Right to Information
- Law on Use of the Right to Petition

Everybody has the right to apply to the public institutions and agencies for requesting information and accordingly the administrations are required to take necessary administrative and technical measures to provide every kind of information and document to the applicants.

3.1.1. Constitution of Republic of Türkiye

Constitution of Republic of Türkiye is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion (Art. 25). No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities (Art. 26). In addition, Turkish citizens and foreigners residing in Türkiye, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public (Art. 74). Accordingly, the principle of reciprocity citizens and foreigners residing in Turkey on condition that observance, on their own or with the wishes and complaints about public authorities and Turkey has the right to appeal in writing to the National Assembly.

The Communication Center of the Presidency (CIMER) is an official government tool that enables fast and effective communication between citizens and public institutions and agencies for application of any information request and submission of suggestions and complaints. The details on the intake channels of CİMER is available at Section 7 of this SEP.

Public institutions and agencies shall provide the requested information within 15 working days. If the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the content of the application pertains to more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days (Article 11).

3.1.2. Law No. 4982 on the Right to Information

Law on the Right to Information defines the process concerning the right to information. It regulates this right in line with the principles of equality, impartiality, and transparency, which are the prerequisites of democratic and transparent administration. According to the obligation

to provide information (Article5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively, and correctly.

3.1.3. Law No. 3071 on Use of the Right to Petition

Citizens of the Republic of Türkiye are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

3.2. World Bank Requirements for Stakeholder Engagement

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

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

A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts needs to be developed by the Borrower. It has to be disclosed as early as possible, and before project appraisal, and the Borrower needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP.

According to ESS10, the Borrower should also propose and implement a grievance mechanism (GM) to receive and facilitate the resolution of concerns and grievances of project-affected

parties related to the environmental and social performance of the project in a timely manner. The scope, scale and type of the required GM will be proportionate to the nature and scale of the potential risks and impacts of the project. The GM may include: (i) enable submission of grievance and concerns in person, by phone, e-mail and/or website; (ii) a log where grievances are registered in writing and maintained as a database; (iii) publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances; (iv) transparency about the grievance procedure, governing structure and decision makers; (v) an appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder identification is an important step in managing the overall stakeholder engagement process and reduces the risk of a particular stakeholder group becoming dominant in the consultation process. It should be performed as early as possible in the project life cycle, taking into account the dynamics between stakeholders and the risks and opportunities of their involvement in the Project. Stakeholder identification is based on the level of interest of the stakeholders and their interaction with the project. According to ESS 10, the project stakeholders are categorized under three groups:

- **Project Affected Parties** persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures,
- Other Interested Parties (OIPs)— individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project due to its location, characteristics, impacts, or matters related to public interest and/or who could affect the project and the process of its implementation in some way, and
- Vulnerable/Disadvantaged Groups/Individuals refer to individuals or groups who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so.

4.1. Key Principles of Stakeholder Engagement

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

Openness and life-cycle approach: Public consultations for the project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation.

Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns,

Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project is inclusive. All stakeholders at all times will be encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.

4.2. Stakeholder Categories for the Project

4.2.1. Project Affected Parties

Project Affected Parties (PAPs) include persons, groups and other entities within the Project Area of Influence (PAI) and other parties that may be subject to direct impacts from the Project and may directly influence the project implementation. The stakeholder groups identified and categorized as PAPs are listed below and in **Hata! Başvuru kaynağı bulunamadı.**

MENR's DG Energy Affairs (DGEA) is the direct affected party and beneficiary of the project given that DGEA is responsible for conducting measurements for the determination and evaluation of all energy resources, primarily wind, hydraulic, geothermal, solar, biomass and other renewable energy resources, and preparing feasibility and sample application projects. Moreover, DGEA is also responsible for developing pilot systems carrying out promotional and consultancy activities in cooperation with research institutions, local governments and non-governmental organizations. In addition, marine users, private sector representatives and relevant NGOs are considered as direct affected parties as their daily activities may be influenced by the project activities.

The indirect affected parties of the project are identified by considering the potential impacts of the downstream investments to be decided according to the outcome of the TA activities to be carried out within the scope of this project.

- BOTAŞ is the indirect affected party of the project since it is responsible for both national and international oil and natural gas transportation projects, LNG/FSRU terminal operations and port services.
- TPAO is another indirect affected party as it carries out hydrocarbon exploration and drillings both in land and seas.
- TEİAŞ as the national electricity transmission corporation is the indirect affected party of this project.
- EMRA as the regulatory authority in the energy sector is the other party which will indirectly be affected by this project

4.2.2. Other Interested Parties

Other Interested Parties – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way, and specifically, the following identified individuals and groups per component fall within this category:

- Presidency of the Republic of Türkiye National Intelligence Organization in terms of the effects on the intelligence and radar systems,
- Ministry of Environment, Urbanization and Climate Change to consult on special protected areas and biodiversity
- Ministry of Defence to obtain information on radars on land, navigation at sea and hydrographic and oceanographic data for national security

- Ministry of Agriculture and Forestry / DG of Fisheries and Aquaculture for the effects on fishing activities and natural habitat
- Ministry of Interior / Turkish Coast Guard Command for national security purposes
- Ministry of Transport and Infrastructure / DG of Maritime Affairs for the effects on marine trafficking and ports
- Mineral Research and Exploration General Directorate (MTA) to consult on the determination of geological and geophysical properties of soils
- Ministry of Culture and Tourism to mitigate the effects on tourism activities and touristic areas
- Kandilli Observatory for researches on earthquakes and tsunamis

Table 1 Stakeholder Groups for the Project

Stakeholder Group	Nature of interest in the project	Interest	Influence
Project Affected Parties	• •		
DGEA	Direct affected party	High	High
BOTAŞ (Natural Gas Transmission System Operator)	Indirect affected party	Low	Medium
TEİAŞ (Electricity Transmission System Operator)	Indirect affected party	Low	Medium
TPAO	Indirect affected party	Low	Medium
EMRA	Indirect affected party	Low	Medium
Marine Users (Fishermen and their cooperatives, marinas, municipalities (due to ferry services), industrialists (due to maritime commerce)	Direct affected party Fishermen and their cooperatives, marinas, municipalities (due to ferry services), industrialists (due to maritime commerce).	Low	Medium
Private sector representatives	Direct affected party	Low	Medium
NGOs	Direct stakeholders engaged in relevant areas like environmental studies, biodiversity etc.	Low	Medium
Other Interested Parties (OIPs)	-		
National Intelligence Organization	Intelligence and radar systems	Low	Medium
Ministry of Environment, Urbanization and Climate Change	Special protected areas, biodiversity	Low	High
Ministry of Defence	Radars on land, navigation at sea and hydrographic and oceanographic data	Low	Medium
Ministry of Agriculture and Forestry	Fishing activities, natural habitat	Low	High
Turkish Coast Guard Command	National security	Low	High
Ministry of Transport and Infrastructure (DG of Maritime Affairs)	Marine trafficking and ports	Low	High
Mineral Research and Exploration General Directorate (MTA)	Geological and geophysical properties of soils	Low	High
Ministry of Culture and Tourism	Tourism activities and protection of touristic areas	Low	High
Kandilli Observatory	Researches on earthquakes and tsunamis	Low	High
Universities/Research Institutions	Engaged in relevant areas like environmental studies, biodiversity etc.	Low	Medium

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1. Summary of Stakeholder Engagement Done During Project Preparation

Project Implementation Unit (PIU) of MENR has conducted a mapping study for needs and problems to be addressed under IPA II assistance with MENR's central administrative units, attached, related and affiliated institutions. Following several meetings and liaison activities, Directorate General of Energy Affairs (DGEA) of MENR was identified as main stakeholders for implementation of the activities programmed under Phase 4 Project. The other affected and interested stakeholders are identified through this document.

The SEP has been published on MENR's website both in English and Turkish between 8-17 March 2023 to inform the stakeholders about the Project activities and the stakeholder engagement process. An online meeting was organized on 16 March 2023 with the participation of nearly 70 people from relevant governmental institutions, NGOs, universities and private sector. The participants were informed about the potential risks and impacts of the project and were requested to share their views on the SEP. All the stakeholders expressed their intentions to be involved in the stakeholder engagement activities and they want to be consulted on related critical issues during the project implementation stage.

5.2. Methods for Stakeholder Engagement

Different engagement methods are proposed and cover different needs of the stakeholders. Various methods of engagement will be used as part of the project's interaction with the stakeholders, to ensure that different stakeholder groups are successfully reached and are involved in the process of consultation, decision-making and the development of impact management solutions.

The stakeholder engagement will rely more on online channels. Where possible and appropriate, online platforms and dedicated discussion groups will be created appropriate for this purpose, depending on the type and category of stakeholders. Traditional communication channels (like TV, newspapers, radio, public announcements and mail) will be used when stakeholders do not have access to online channels. Materials like project documents, presentations, questionnaires and discussion topics will be distributed online to participants.

The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Table 2 Engagement Methods to be Employed under the Project

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	 Information sharing (in particular technical) on project requirements and impacts Invitations to meetings and key events during project implementation Arrangements for obtaining permits, licenses Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organizations/agencies

Engagement Method	Application/Purpose of the Method	Target Stakeholder
One-on-one meetings - Information collection on an individual basis allowing stakeholders to voice their concerns/opinions about sensitive issues - Establishing personal connections with		Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organizations/agencies, contractors and consultants
Formal meetings - Receiving comments, feedback, views and perception of project from a group of public institutions - Establishing relations with public		Different national and local government authorities and officials, NGOs, academia, and organizations/agencies, national and local media
(including the fishermen and their cooperatives, marine members, etc.) about the scope and timeline of the Project. - Receiving comments, feedback, views and perception of project from a group of stakeholders		Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organizations/agencies, etc.
Digital communication tools social media (Facebook, Twitter, Instagram accounts, WhatsApp groups), national/local television channels, radio Digital communication - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents related with the Project		Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organizations/agencies
Project information brochures/leaflets - Sharing brief project information to provide regular update - Informing the stakeholders on certain issues such as project implementation schedule, scope of project activities, etc.		Any stakeholder group identified throughout the project including PAPs, businesses and organizations/agencies
- Information sharing on a specific topic to a group of people including vulnerable groups - Receiving comments, feedback, views and perception regarding the project from a certain group - Collecting grievances, concerns and feedback related to the project from a group - Monitoring project activities' environmental and social impacts and risks on a group - Establishing relations with stakeholders		Any stakeholder group identified throughout the project, including project affected people, vulnerable groups, etc.

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Grievance Mechanism (GM)	- Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders	Any stakeholder group identified throughout the project

MENR will assign a full-time designated expert within PIU for the management and monitoring of stakeholder activities including the monitoring of grievance related actions taken. PIU will utilize its existing online communication channels and facilities for disclosure of written/print/visual materials. Project updates will be posted on PIU's website (www.enerjiprojeleri.eu). Where applicable and preferred by the stakeholders, PIU will also communicate project information and updates through other means such as social media, distributed printed material, one to one interviews and consultation meetings as appropriate.

Table 3 The Overview of the Stakeholder Engagement Program

Project stage	Target stakeholders	List of information to be disclosed	Methods to be used	Frequency	Responsible party
Design and Preparation	 Beneficiary institutions Public institutions and authorities Private sector Transmission System Operators Marine users 	 Action Document Project document Financing Agreement Grant Agreement SEP, Environmental and Social Commitment Plan (ESCP) GM 	 Public announcements Non-technical project summaries/presentations Electronic publications Social media Press releases Formal letters E-mails Consultation meetings (virtual, face-to-face) Information on website Poster, brochure, leaflet, etc. 	Before the commencement of project activities Throughout the project lifecycle	MENR PIU
Implementation	Beneficiary institutions Marine users	 Project Appraisal Document Procurement Guidelines Specific Procurement Notices GM reports Regular project update/information 	 Formal letters E-mails Consultation meetings (virtual, face-to-face) Poster, brochure, leaflet, etc. Electronic publications Social media Press releases 	Prior to start of implementation of the project Quarterly (during the project lifecycle)	MENR PIU
Implementation	 Public institutions and authorities Private sector Transmission System Operators Marine users 	 Project progress reports Project deliverables GM, GM procedure 	 Consultation meetings (virtual, face-to-face) Radio, TV, newspaper and social media, press release, announcements Project related announcements on websites and social media accounts of PIU GM, GM procedure 	Prior to start of implementation of the project, Quarterly (during the project lifecycle)	MENR PIU Beneficiary Institutions

Closing	 Beneficiary institutions Public institutions and authorities Private sector Transmission System Operators Marine users 	 Project progress and evaluation reports Project Outcomes 	 Closing Meeting Consultation meetings Disclosure meetings, Press Releases Website and social media announcements Poster, brochure, leaflet, etc. SMS 	After completion of project activities (Upon the closure of the contracts)	MENR PIU
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5.3. Future Phases of the Project

Timely organization and execution of stakeholder engagement activities that will be conducted throughout the life of the Project, will be critical in supporting the Project's risk and impact management process. This is especially the case during the early identification and management of potential adverse and positive impacts and risks which will allow for a cost-effective project design.

During the project implementation, stakeholders will be kept informed as the project develops by reporting on implementation of both individual contracts, Stakeholder Engagement Plan and the grievance mechanism, mainly on virtual communication channels.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1. Resources

MENR PIU will be in charge of stakeholder engagement activities. The budget required for implementing the stakeholder engagement plan over project duration will be allocated from MENR's budget and used for conducting the above specified activities with different stakeholders and for communication and visibility activities. Since all of the activities will be carried out by MENR's own staff and all of the meetings will be organized either online or in MENR premises, the costs to be incurred throughout the implementation of SEP will be considerably low. The indicative amount of budget required is up to €10,000.

6.2. Management Functions and Responsibilities

MENR will implement the program within its existing organizational structure. MENR PIU will be responsible for the overall implementation of the project activities and this SEP. PIU will work in close collaboration with beneficiary institution for the implementation of the project.

PIU staff will include experts in project management as well as monitoring and evaluation. Besides, the PIU will also assign one environmental and social specialist as a focal point to support the management of environmental, social, health and safety (ESHS) risks and impacts of the Project.

The stakeholder engagement activities will be monitored by the assigned expert within the PIU staff who will track the progress of the SEP as well as the feedback and grievances received. All records related with the SEP activities at the contract level will be reported to PIU by the beneficiary institution regularly with other project progress information. Individual beneficiary institution will not be required to prepare their own SEPs, however they will be obligated to participate in stakeholder engagement activities to ensure satisfactory implementation of this SEP.

All project engagement records including GM specific information will be kept by PIU. The PIU will also update project website regularly (at least on a quarterly basis) with key project updates and reports on the project's engagement events. Project GM will be in place prior to project effectiveness and will be maintained during the entire lifetime of the project to receive any concerns from stakeholders. Stakeholder engagement activities will be documented and shared with the World Bank on regular basis together with the project progress report.

The other project implementation arrangements are as follows: Ongoing feedbacks and comments received from stakeholders throughout the implementation of the project will be reviewed and necessary restorative actions, if needed, will be undertaken by PIU with relevant stakeholders to ensure smooth implementation of the project.

The PIU will conduct a midterm stakeholder engagement survey to seek feedback from beneficiary institutions on their satisfaction with the project. The PIU will discuss the survey results with beneficiary institutions and will inform WB on the matter.

7. GRIEVANCE MECHANISM

The main objective of a Grievance Mechanism (GM) is assisting to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:

- Provides affected people venue for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

7.1.GM at National Level

Presidential Communication Center (CİMER)

In addition to the project specific GM, the national grievance mechanism will be one of the tools that the project GM will feed from. MENR and/or beneficiary institutions may receive formal requests and grievances through the Presidential Communication Center (CIMER) on different types of complaints related to the project.

In practice, CIMER is only available to Turkish citizens. Project related grievances received through CIMER will also be recorded by PIU and processed similarly with project GM. CIMER will complement project GM throughout project life.

• Website: https://www.cimer.gov.tr

• Hotline: 150

• Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara

Phone: +90 312 590 2000Fax: +90 312 473 6494

• Individual applications at the community relations desks at governorates, ministries and district governorates.

Foreigners Communication Center (YİMER)

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

• Website: www.yimer.gov.tr

• Call Centre: 157

• Phone number: +90 312 5157 11 22

• 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

7.2.GM at Ministerial Level

MENR has online communication and project GM in place and approved policy documents to regulate and address grievances of all project stakeholders. In line with the requirements of ESS10, the project specific grievance mechanisms will be open to the use of all stakeholders and it will be used to deliver any possible message, resolve any complaint and/or suggestion by any stakeholder or affected people. In the context of the Project, it is expected to receive any kind of feedbacks from all stakeholders.

The project GM for all project stakeholders is accessible via MENR PIU's official website (www.enerjiprojeleri.eu) and aims to collect and address grievances of all stakeholders. The responsible body governing this grievance process is the PIU itself. All inquiries/grievances received are directed to the relevant responsible staff/department to be responded maximum within 15 days unless any other time period is required legally. The GM Forms are available both in Turkish and English:

Turkish link: https://enerjiprojeleri.eu/tr/6/iletisim

English link: https://enerjiprojeleri.eu/en/21/contact-us

Project stakeholders can also submit their complaints to the addresses below:

• Address: Türk Ocağı Cad. No:2 06100 Çankaya/Ankara/Türkiye

Phone Number: +90 (312) 546 46 46
Fax Number: +90 (312) 222 57 60

Project GM will be used to submit complaints related to the overall management and implementation of the project, including violation of project policies, guidelines, or procedures, including those related to child labor, health and safety of workers, workplace harassment (mobbing, sexual exploitation and abuse and sexual harassment (SEA/SH), etc.).

The GM will also allow submission of anonymous grievances. The anonymous grievances will be considered and assessed as others however feedback may not be provided to the complainant due to lack of name, contact information etc. All complaints/suggestions received from all related stakeholders regarding this Project will be documented either using the sample Grievance Mechanism Form provided in the Annex or the GM forms available at the above mentioned MENR PIU's official website. All grievances will be acknowledged and responded within 15 days.

7.3. Workers' GM

GM for project workers is provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The main objective of Project Workers GM is to provide project workers with accessible means to raise workplace concerns. Within the context of this SEP, the term 'project worker' refers to:

- a. People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers),
- b. People employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers).

The Project Workers GM utilizes existing GM which is readily accessible to all direct workers who are the civil servants under By-Law on Civil Servants' Grievances and Appeals (Official Gazette dated 12.01.1983 and numbered 17926). Civil Servants Code and its relevant regulation provide for the grievance procedure for civil servants. Pursuant to Article 21 of Law No. 657 (Civil Servants Law); civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition, etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible. The complaint must be concluded within 30 days, from date of receipt of the first disciplinary supervisor authorized to decide. Civil servants who exercise their right to complain cannot be fined for their complaints. However, the grievance mechanism available to civil servants will not be utilized for the other direct workers (i.e. consultants and contracted workers'), but the GM to be established for the project will be accessible to all project workers.

Project workers can raise concerns regarding unsafe and unhealthy work situations to their superiors starting from immediate one and by skipping the responsible one. The grievances can be submitted in written form or verbally. The responsible body governing this grievance process is first disciplinary superior of the complainant. The response to the grievances will be given within 15 days upon receipt. The complainant and the complainee have the right to object to the decision given by the first disciplinary superior within 10 days upon receipt of the decision.

MENR and consultant firm will inform direct and contracted workers, respectively, about the available GM and how it works. The relevant information will be made available throughout project duration in a manner that is clear, understandable, and accessible to workers by including it in workers' handbooks, on notice boards, or through similar communication mechanisms.

The project specific GMs will not impede access to other judicial or administrative remedies available under the national law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

7.4. Appeal Mechanism

Applicants, whose complaints could not be resolved through existing GM or whose complaints contains sensitive issues can always apply to the relevant legal institutions. Such institutions can be summarized as follow:

- Civil Courts of First Instance,
- Administrative Court.
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

Relevant legal process will be monitored through GM.

For the cases relevant to sexual exploitation and abuse/sexual harassment (SEA/SH) and GBV (Gender Based Violation) at workplace or any potential child abuse in the project sites, the complaint will be directed by the GM focal point of the MENR to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office through considering confidentiality.

Information about the project's GM will be publicized as part of the initial feedback consultations in the project and information about the GM will also be posted online on the project website.

7.5. The World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

Project affected communities and individuals may submit their complaint to the Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's corporate Grievance Redress Service (GRS), please visit: http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

8. MONITORING AND REPORTING

The PIU will monitor the implementation of the SEP on an ongoing basis during the life of the Project, including reviewing the functioning of the GM and types of grievances recorded. This will work as a feedback loop on the project and facilitate adjustments/improvements to be made during engagement. At completion of SEP activities, a review of outputs will be conducted in order to evaluate the effectiveness of the SEP as implemented. The project SEP will be monitored based on the following indicators:

- i. Number of quarterly grievances received and how they have been addressed in the reporting period and total number of grievances since the beginning of the project,
- ii. Number of stakeholders involved in consultations and other project SEP related activities,
- iii. Percentage of resolved grievances within quarterly periods,
- iv. Percentage of resolved grievances within in the reporting period,
- v. Percentage of pending and resolved grievances cumulative since the beginning of the project,
- vi. Number and percentage of grievances by subjects/categories
- vii. Assigning one environmental and social focal point to ensure successful implementation of the SEP
- viii. Number of stakeholder engagement activities (inclusive of all groups including women and vulnerable groups) to disseminate information about the Project

PIU will maintain a simple database and activity file detailing all public consultation, disclosure information and grievances collected throughout the project. PIU will ensure that records of all stakeholder engagement activities (conducted either by PIU or beneficiaries) are kept in the database which will include dates, venues, attendees, objectives, issues discussed and outcomes of the meetings. For each consultation meetings, attendance lists will be prepared and signed, and where possible, photographs will be taken and recorded.

Stakeholder engagement activities will be quarterly evaluated by the PIU. The PIU will ensure that all consultation and disclosure activities are recorded with adequate details indicated above. SEP implementation and relevant grievances will be reported in semi-annual project progress reports under a separate section. The reports will include all stakeholder engagement and consultations made (together with their details), details on the grievance mechanism, etc. and resolutions.

8.1. Involvement of Stakeholders in Monitoring Activities

MENR PIU will be seeking feedback from beneficiary institutions and other relevant stakeholders throughout the project and discuss the results of the progress reports with relevant stakeholders as needed. A midterm survey on "Stakeholder Engagement" will be conducted by the PIU to seek feedback from the beneficiaries on their satisfaction with the Project. The PIU will analyze the results which will inform the project implementation as appropriate.

The PIU will take into account the inputs and comments received from stakeholders through the GM. In case of any inquiries about a specific contract financed through the project or any other monitoring inquiry, the feedback will be evaluated by the PIU and appropriate response will be provided to the related stakeholder.

Reporting Back to Stakeholder Groups

The SEP will be periodically reviewed, updated and disclosed as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development.

Any major changes to the project related activities and to its schedule will be duly reflected in the SEP which will be updated and redisclosed. Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- i. Publication of a standalone annual report on project's interaction with the stakeholders,
- ii. A number of Key Performance Indicators (KPIs)2 will also be monitored by the project on a regular basis.

² Examples include: number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually); frequency of public engagement activities; number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline; number of press materials published/broadcasted in the local, regional, and national media.

ANNEX 1. SAMPLE GRIEVANCE FORM

	GRIEVANCE FORM	
Name of the Staff Receiving the Grievance		Date
Title		
Stakel	nolder Information (Optional)	Grievance Receipt Method
Name-Surname		Phone
Phone		Website
E-mail		Office Visit
Address		E-mail
Signature		Other
	Details of Grievance	

ANNEX 2. LIST OF PARTICIPANTS OF THE CONSULTATION MEETING

	Name	Institution
1	Engin Bostancı	MENR / DGFR
2	Merve Şenol Öney	MENR / DGFR
3	Gözde Ertemir	MENR / DGFR
4	Mustafa Erkeç	MENR / DGEA
5	Murat Kaplaner	MENR / DGEA
6	Mehmet Aşker	MENR / DGEA
7	Turgut Ölemez	MENR / DGEA
8	Ümit Aykar	MENR / DGEA
9	Mahmut Burak Tarakçıoğlu	MENR / DGEA
10	Serpil Durak	MoEUCC
11	Fatih Kargın	MoEUCC
12	Sedat Koçak	MoEUCC
13	Serap Yıldız	MoEUCC
14	Gönül Su	MoEUCC
15	Vildan Bölükbaşı Atay	MoEUCC
16	Aslı Topalak	MoEUCC
17	Kerem Noyan	MoEUCC
18	Bahar Özöğüt	MoEUCC
19	Rabia Zafer	MoEUCC
20	Ülkü Aybuğa	MoEUCC
21	Hasan Murat Tüzün	MoEUCC
22	Gamze Kılınç Demirvuran	MoEUCC
23	Özge Çakır	MoEUCC
24	Dr. Dilek Tezel	MoEUCC
25	Gözde Reşber	MoEUCC
26	Dilek Deliçay	MoEUCC
27	Tülay Çalışkan	MoEUCC
28	Zeynep Fikran Yenice	Ministry of Tourism and Culture
29	Hayrettin Beyhan	MoTI
30	Bülent Sönmez	MoTI
31	Yakup Kocaman	MoTI
32	Gonca Gül Yalçın Kalmaz	MoD - Land Forces Command
33	Emrah Bulat	Turkish Coast Guard Command
34	Aycan Oğuzalp	Turkish Coast Guard Command
35	Koray Eryetgin	Turkish Coast Guard Command
36	Nuri Dağlı	Turkish Coast Guard Command
37	Cansu Akdeniz Kani	Turkish Coast Guard Command
38	Ozan Emre Işıklı	Turkish Coast Guard Command
39	Adnan Aras	Turkish Coast Guard Command
40	Vuslat Öztürk	BOTAS

41	Erkan Söylemez	BOTAS
42	H. Selcen Köse	TPAO
43	D. Tayfun Beşevli	TPAO
44	Ümit Çetinkaya	TEIAS
45	Kazım Şenocak	TEIAS
46	Şehri Nur Güler	TEIAS
47	Zeynep Köroğlu Erdoğan	EMRA
48	İsmail Bahtiyar	EMRA
49	Özgür Türkmen	MTA
50	Murat Durak	Düred
51	Dolunay Güçlüer Küpeli	Düred
52	Ahmet Saklıca	Montfort
53	Metin Güven Şahin	Akademi Şehir Planlama Mim. Müh.
54	Cahit Coskun	Habas
55	Fatih Torpi	Habas
56	Melihat Madran	Res-group
57	Batuhan Türkmen	Res-group
58	Hilal Bakkaloğlu	Res-group
59	Ali Pınar	Bogazici University
60	Mustafa Özyalvaç	Denar
61	Özkan Bayezıt	

ANNEX 3. PRESENTATION DELIVERED DURING THE CONSULTATION MEETING







AVRUPA BİRLİĞİ / KATILIM ÖNCESİ MALİ YARDIM ARACI (IPA) — IPA 2019 ENERJİ SEKTÖR PROGRAMI — FAZ 4 PROJESİ (P179235)

Paydaş Etkileşim Planı

1



Proje Kapsamı

Marmara Denizi'nde belirlenen sahalarda;

- Meteorolojik ve oşinografik ölçümler
- Jeolojik ve jeoteknik ölçümler
- Ekonomik ve finansal ön fizibilite çalışmaları
- Çevresel ve sosyal kısıt analizi

Kapasite Geliştirme Faaliyetleri:

- Eğitimler
- Saha ziyaretleri
- Çalışma ziyaretleri





2



Paydaş Etkileşim Planının Amaçları

- Proje kapsamındaki doğrudan ve dolaylı paydaşların ve diğer ilgili tarafların belirlenmesi ve tüm paydaşlarla etkin, doğru ve şeffaf bir iletişimin kurulması,
- Paydaşların projeye olan ilgisinin ve desteğinin belirlenmesi ve proje dizaynında ve çevresel ve sosyal risklerin azaltılmasına yönelik alınacak önlemlerde görüşlerinin alınması,
- Potansiyel olarak etki yaratabilecek konularda proje süresince paydaşlarla ve diğer ilgili taraflarla etkili ve kapsayıcı bir ilişkinin kurulması,
- Paydaşlara; proje ve olası çevresel ve sosyal riskler ve bunların etkileri hakkında tam bilginin zamanında, anlaşılabilir ve erişilebilir bir formatta sağlanması,
- Paydaşlar ve kamu için erişilebilir ve kapsayıcı bir şikayet mekanizması yapısının belirlenmesi.





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Paydaş Grupları

Projeden Etkilenen Taraflar	Diğer İlgili Taraflar
EIGM (faydalanıcı kurum)	İlgili kurum ve kuruluşlar (ÇŞİDB, MSB, Sahil Güvenlik Komutanlığı, MTA, Kandilli Rasathanesi)
BOTAŞ	Üniversiteler / Araştırma Kuruluşları
TEIAŞ	STK'lar
TPAO	
EPDK	
Denizlerde faaliyet gösterenler (bakkçılar, belediyeler, sanayiciler vs.)	
Özel sektör temsilcileri	





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Paydaş Etkileşim Yöntemleri

- Yazışmalar (resmi yazılar, telefon, e-posta vs.)
- · Resmi ve birebir toplantılar
- İstişare toplantıları, çevrimiçi toplantılar
- · Dijital iletişim araçları (sosyal medya, TV, radyo vs.)
- · Proje bilgi broşürleri ve kitapçıklar
- Şikayet Mekanizması





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Paydaş Etkileşim Planı Yönetim Fonksiyonları

ETKB Proje Uygulama Birimi;

- · Proje faaliyetlerinin uygulanması ve izlenmesi
- · PEP'in uygulanması ve izlenmesi
- · Geri bildirim ve şikayetlerin alınması ve yanıtlanması
- Proje ilerlemesine ve paydaş etkileşimi faaliyetlerine ilişkin kayıtların muhafaza edilmesinden sorumludur.







Şikayet Mekanizması

\$M'nin amacı;

- Etkilenen kişilerin şikayette bulunmaları veya projelerin uygulanması sırasında ortaya çıkabilecek herhangi bir anlaşmazlığı çözmeleri için imkan yaratmak,
- Uygun ve karşılıklı olarak kabul edilebilir çözüm eylemlerinin belirlenmesini ve onların şikayetçileri memnun edecek şekilde uygulanmasını sağlamak,
- Adli kovuşturmaya başvurma ihtiyacını ortadan kaldırmaktır.





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Şikayet Mekanizmasına Başvurular

- · Ulusal düzeyde ŞM (CİMER, YİMER)
- Bakanlık düzeyinde ŞM (www.enerjiprojeleri.eu internet adresi veya Bakanlığımıza posta yoluyla)
- İtiraz Mekanizması (Asliye Hukuk Mahkemeleri, İdare Mahkemesi, Asliye Ticaret Mahkemeleri, İş Mahkemeleri, Ombudsman)
- Dünya Bankası ŞM (Şikayet çözüm servisi):
 «http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service», teftiş paneli: www.inspectionpanel.org





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