

# Bebek Bezleri

Daha emici ve daha rahat



Report

## Paksiel Kimya Sanayi ve Ticaret A.Ş.

Capacity Extension Investment

Stakeholder Engagement Plan (SEP)

October 2021

## Report

# Proje Adı: Capacity Extension Investment Stakeholder Engagement Plan (SEP)

October 2021

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## Abbreviations

CACCF	Corrective Action and Complaint Closure Form
ÇOIZ	Çerkezköy Organized Industrial Zone
CRF	Complaint Record Form
DoEU	Directorate of Environment and Urbanization
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
GRM	Grievance Redress Mechanism
HR	Human Resources
IFC	International Finance Corporation
MoEU	Ministry of Environment and Urbanization
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OIZ	Organized Industrial Zone
Paksiel Kimya	Paksiel Kimya Sanayi ve Ticaret A.Ş..
Project	Paksiel Capacity Extension Investment
SEP	Stakeholder Engagement Plan
TKYB	Investment and Development Bank of Turkey



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## 1.0 INTRODUCTION

Ensuring healthy, trust-based and transparent stakeholder engagement plays a key role in the successful management of the social and environmental impacts of projects. Therefore, a functional Stakeholder Engagement Plan (SEP) should be developed and implemented effectively, ensuring the participation of all stakeholders who are directly or indirectly affected by the project and/or who are interested in the project results. Based on this requirement, SEP document has been developed to manage the stakeholder engagement process in line with the background and objectives of the Project.

### 1.1 Project Background

Paksi Kimya will carry out the project aiming to increase capacity in diaper production in Çerkezköy Organized Industrial Zone (ÇOIZ), which is established within the borders of Tekirdağ Province, Çerkezköy and Kapaklı Districts.

Paksi Kimya Sanayi ve Ticaret A.Ş., which also includes the Project Area, Çerkezköy Organized Industrial Zone Karaağaç Mah. Atatürk Cad. 7.Sk. No: 9-11 Kapaklı / Tekirdağ.

On the ÇOIZ Settlement Map below, the location of the Paksi Kimya factory, where the Paksi Capacity Extension Investment site is located, is shown together with the companies in the ÇOIZ settlement. There are industrial facilities located within the boundaries of ÇOSB around the project area.





**ÇERKEZKÖY ORGANİZE  
SANAYİ BÖLGESİ**

## YERLEŞİM PLANI

TARİH : 30.03.2021  
REVİZYON NO : 08-2021

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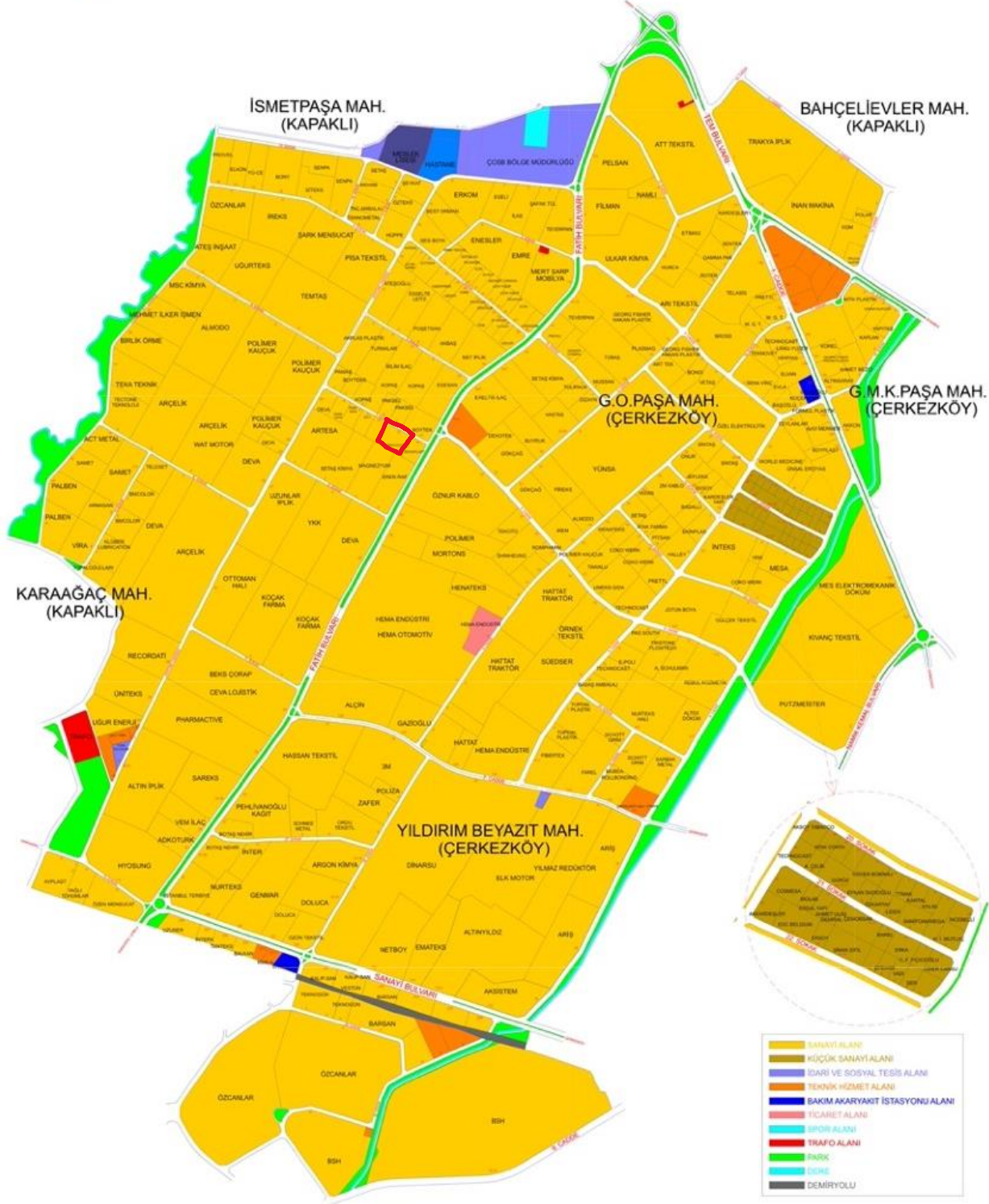


Figure 1-1: ÇOIZ Settlement Plan and Project Location





Settlements, educational institutions, schools and transportation routes, highways around the Project area are shown on the map below.

The closest settlements to the Project area are Karaağaç and İsmet Paşa Neighborhood located within the borders of Kapaklı District, Gazi Osman Paşa (G.O.P.) and Yıldırım Beyazıt Neighborhood within the borders of Çerkezköy District.

There are many settlements around the ÇOIZ. In addition, there are many educational institutions and schools in the north and west of the Project Area. The locations of the schools are shown on the map below.

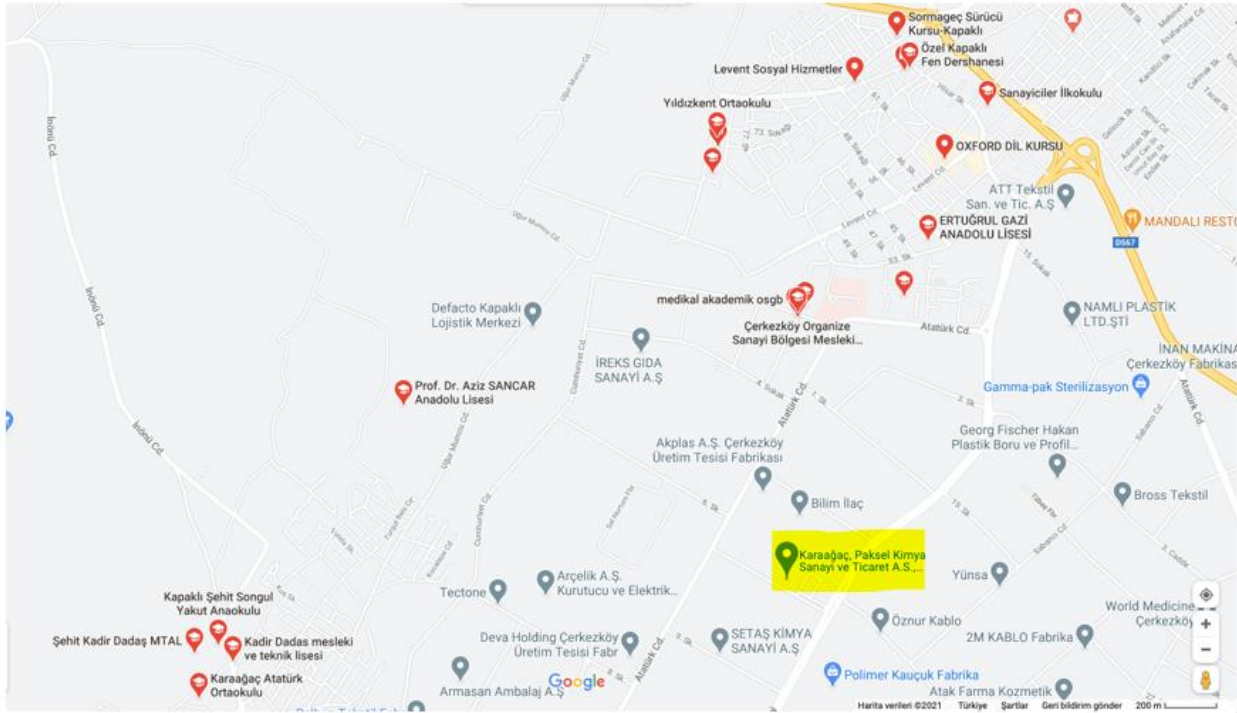


Figure 1-2: Project Area

The parcel where the project is located has a total area of 12,371 m<sup>2</sup> according to the title deeds. The facility has a closed area of approximately 8.700 m<sup>2</sup>.

The property of the mentioned area belongs to Paksel Kimya. Apart from these structures, on the opposite side of the road in front of the facility, there is a raw material warehouse with a closed area of approximately 2,500 m<sup>2</sup> leased by Paksel Kimya.

The existing facility includes one sanitary napkin production line, three diaper production lines, one tie-back diapers and underpad production line (AT250) and one tie-on diaper production line (AT200). Of the three diaper production lines, one has new technology (BT650) and two has older technology (BT600, AB500).

There is no building construction activity within the scope of the project. Within the scope of the project, only the existing diaper production line with BT600 number will be removed and a new line with more advanced technology will be installed. In addition, the other existing diaper production line with BT650 number will be maintained and renewed. Therefore, the Project consists of two phases, installation and production. Paksel Kimya Industry and Trade Inc. Within the scope of the Diaper Production Capacity Extension Investment, the existing machine line in production will be removed and a new machine line with more capacity will be installed to produce the same product.

Before the installation phase, there is a process of manufacturing, testing and preparing the machine line in Italy. In this process, the dismantling of the existing machine line, which is still in production, and its



transportation from the factory will be carried out. The dismantling and removal of the existing machine line from the factory will be done by potential buyers. It is expected that the existing machine line will be dismantled in 3 weeks.

After the upgrade installation of machinery and production lines in Italy and the tests are completed, the new machine line with about 12 trucks from Italy to Turkey shipment will be made. Machine parts will be delivered to the Project area within Paksel Kimya via Çerkezköy Customs. Following the shipment and delivery of the parts of the machine line, an expert team from Italy will set up the machine line in 3 weeks.

The flow chart of the diaper production to be produced within the scope of the project is given below.

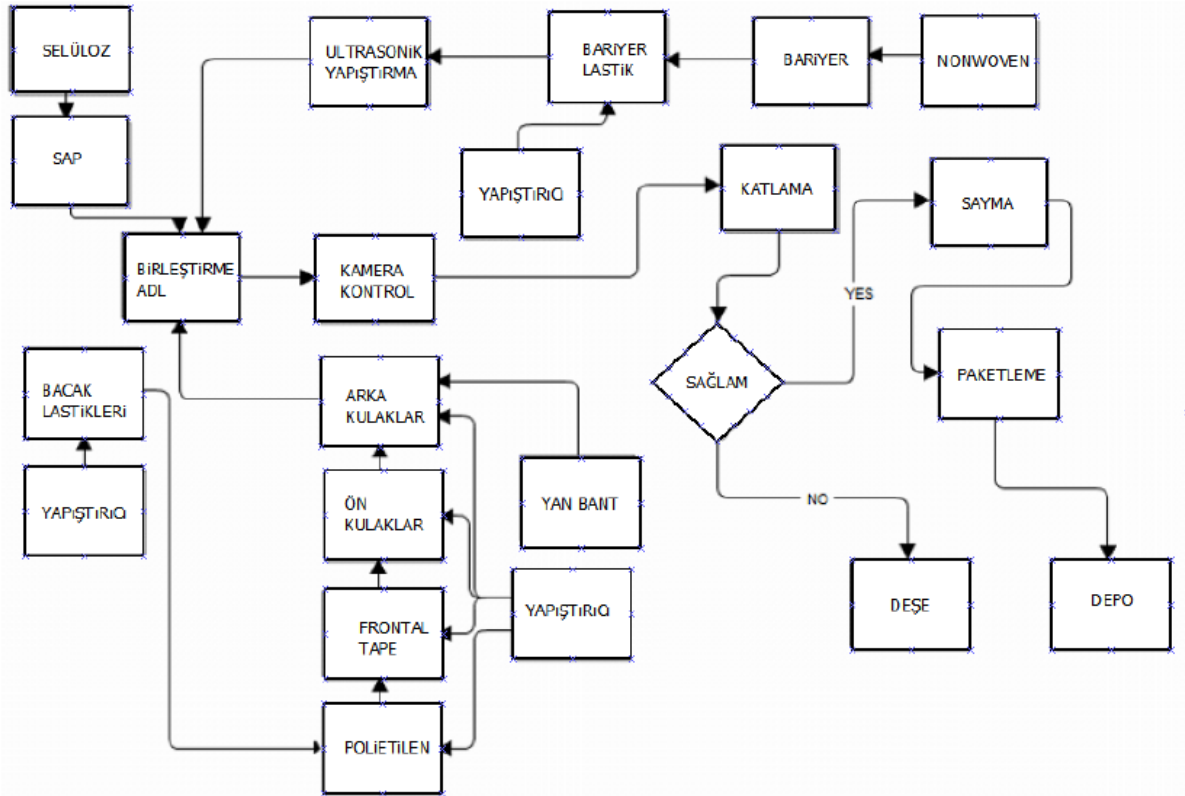


Figure 1-3: Workflow of the Project

The process flow chart for the production of diapers is shown in Figure 1-3 and explained in detail below.

- Cellulose, which is given raw to manufacturing, is subjected to crushing process.
- After the cellulose is broken, it is blended with absorbent and turned into pulp by vacuuming.
- Polyethylene, which forms the bottom layer of Diapers, is manufactured.
- In the opening and closing process of Diapers, frontal tape, which acts as a holder, is manufactured and the back side is hotmelt and joined to join with polyethylene.
- The elastic bands that prevent leakage in the leg gaps are glued (hotmelt) and combined with polyethylene.
- After the above-mentioned processes are carried out, the inner surface of the polyethylene is glued (hotmelt) and combined with the absorbent cellulose pulp.
- The wing barriers that prevent leakage are put into production and the barriers are divided into two equal widths to add to both sides of the pad.

- 
- The tires that provide the tension of the barrier are glued (hotmelt) and the parts divided into two are joined together one by one.
  - Nonwoven is mounted between the rubber barriers divided into two.
  - The acquisition layer is taken for manufacturing, and it is mounted to the center of the barrier nonwoven.
  - Front parts are put into production.
  - Rear parts are put into production.
  - All the above-mentioned elements come together at this point of the production line and are subjected to a joining process. Thus, the main structure of diapers occurs.
  - The holding sidebands of Diapers that perform the closing process are manufactured and added to the diapers.
  - At this stage, the function of all raw materials related to production has been realized, and all controls are made with a quality control camera. Defective product photo is automatically saved in the computer system. Defective products are automatically disposed of by the machine.
  - After the length cutting process, diapers that are cut are separated one by one and given to the folding unit.
  - The product is first folded lengthwise. After this process is over, it is doubled in the middle.
  - The product comprising the package is counted.
  - All of the counted packages are compressed and put into the bag.
  - In this way, the packaged product is formed, and the product is packaged and shipped to the warehouse after being collected in relevant quantities.

With the project, diaper production capacity will increase from 500 diapers / min to 600 diapers / min. With the capacity increase in the project and the use of the new machine line in production, it is expected that the amount of cellulose used in baby diaper production will decrease by approximately 40%.

There are approximately 5 employees in the current line of Paksel Kimya. As a result of the capacity increase realized with the project, it has been determined that the optimum number of workers for the production process will be 5 or 6 in the new machine line that will start production. From this point of view, 5 or 6 workers are planned to work in the new machine line, as in the existing production system.



## 1.2 Purpose and Scope

Stakeholder engagement is the process in which a project involves people who may be affected by its decisions, activities, results or who can influence the project implementation. Maintaining the communication and relations established with the project stakeholders in a constructive, open and trust-based manner is one of the success indicators of the project. For this reason, stakeholders should be defined correctly, effective and functional methods should be used, and stakeholder participation should be maintained effectively throughout the project. Therefore, developing and explaining the Grievance Redress Mechanism (GRM) is one of the main purposes of the SEP.

Stakeholder Engagement Plan ensures the successful management of environmental and social impacts throughout the project cycle. SEP is one of the basic and important tools of the project by defining the method and approach of the process of communicating with stakeholders, involving the relevant stakeholders in line with the project objectives.

The Stakeholder Engagement Plan (SEP) has been prepared to define the stakeholder groups, to determine the most appropriate and efficient method and approach for the project's characteristics and needs. The aims of the SEP;

- Identifying and defining all current and potential stakeholders for the installation and operation phases of the project,
- To establish the stakeholder engagement strategy and approach of the project,
- To design stakeholder engagement tools and methods according to the cultural, social and economic characteristics of the stakeholders,
- Identifying the roles and responsibilities of key stakeholders in implementing and managing the stakeholder engagement plan;
- To establish an information, communication and consultation framework that will ensure that stakeholders can access information on project activities in a timely and understandable manner,
- Identifying disadvantaged groups affected by the project and ensuring that these groups are included in stakeholder engagement processes,
- To define the structure of the Grievance Redress Mechanism, which is one of the important tools of the stakeholder engagement process, where the opinions, complaints and suggestions from the stakeholders are received and assessed,
- To improve monitoring and reporting procedures.

SEP of the Project was developed as a component of the Environmental and Social Management Plan (ESMP) and is in a structure that overlaps with other management plans; together with these plans. The Paksel Kimya Capacity Extension Investment SEP document has been prepared to meet to the standards and requirements for stakeholder engagement which defined in the national legislation, Turkey Development and Investment Bank (TKYB) and the International Finance Corporation (IFC).

## 1.3 Content of the Plan

Stakeholder Engagement Plan structure is as follows:

Chapter 1 Introduction

Chapter 2 National And International Standards And Requirements

Chapter 3 Identification Of Stakeholders

Chapter 4 Tools And Methods For Stakeholder Engagement

Chapter 5 Stakeholder Engagement Plan

Chapter 6 Grievance Redress Mechanism Procedure



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## 2.0 NATIONAL AND INTERNATIONAL STANDARDS AND REQUIREMENTS

There are two main headings that form the framework of the stakeholder consultation and disclosure. This SEP prepared within the scope of the ESMP and developed in line with the other plans of the Project will comply with the following national legal framework and international standards.

### 2.1 National Legislation

The main source of legal framework Stakeholder Engagement Plan is primarily the Constitution of the Republic of Turkey. Constitutional articles regarding stakeholder engagement form the basis of the Stakeholder Engagement Plan.

Equality before the law, Freedom of thought and opinion, Freedom to express and disseminate thoughts, Right to rectification and reply, Health, environment and housing, Health services and protection of the environment, Protection of historical, cultural and natural assets, Petition, right to information and appeal to the ombudsman (government auditor) are the articles that determine the legal framework for the Stakeholder Engagement Plan.

SEP has been prepared in accordance with the right to have information and the obligation to give information included in the Law No 4982 on the Right to Information, published in the Official Gazette No 25269 on 24/10/2003, the petition right included in the Law on the Use of Petition Right No 3071 and Environmental Law No. 2872 published in the Official Gazette on 11/8/1983.

The Ministry of Environment and Urbanization (MoEU) is the competent authority responsible for the publication and implementation of policies and legislation on environmental protection, as well as the sustainable development and management of natural resources, in addition to policies and legislation regarding urban planning.

The "Environmental Impact Assessment Regulation" which regulates the administrative and technical procedures and principles to be followed in the Environmental Impact Assessment (EIA) which published in the Official Gazette on 25/11/2014, defines the legal responsibilities of the EIA process and the framework of the entire process.

### 2.2 TKYB Standards and Principles

TKYB has set its standards with principles and policies focused on development, environmental and social benefits.

TKYB has revealed its potential negative impacts on environmental and social activities, its approach to reducing and managing risks with its Environmental and Social Policy and announced it to its stakeholders.

TKYB acquired the TSE EN ISO 14001 Environmental Management System Standard in 2010. The Environmental Management system aims at the following principles:

- To reduce the use of resources and the waste produced without reducing the service quality while performing activities and services,
- To create positive environmental impact and awareness within the scope of banking services and activities,
- To minimize the adverse impacts on human health and the environment,
- To ensure the sustainability and regular improvement of the system created,
- To support the environmentally sensitive studies and all kinds of voluntary activities,
- To have an internationally management system that meets the requirements specified in the TS-EN-ISO 14001 Environmental Management System Standard.



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In the light of these principles, TKYB complies with national legislation, laws and regulations in order to manage environmental and social impacts and fulfill legal obligations, and also follows national and international best practices.

The Project Stakeholder Engagement Plan has been organized in accordance with these principles and policies and in line with the standards of national and international good practices.



## 2.3 IFC Performance Standards Requirements

The project will be carried out in accordance with the performance standards set by IFC.

IFC has determined 8 standards covering all social and environmental components and issues. Performance standards are given below:

IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

IFC Performance Standard 2: Labor and Working Conditions

IFC Performance Standard 3: Resource Efficiency and Pollution Prevention

IFC Performance Standard 4: Community Health, Safety, and Security

IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement

IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

IFC Performance Standard 7: Indigenous Peoples

IFC Performance Standard 8: Cultural Heritage

IFC Performance Standard 1 outlines the SEP. Therefore, the SEP will be prepared according to the basic framework defined by IFC PS 1 and will be developed in a way to include the management of stakeholder engagement activities included in other performance standards.

The importance of including the stakeholders in the environmental and social performance management process has been emphasized within the purpose and scope of Performance Standard 1. "An effective Environmental and Social Management System is a dynamic and continuous process implemented and supported by the company management and includes the participation of the client, the employee, the local community directly affected by the project (Affected Communities) and, if any, other relevant stakeholders<sup>1</sup>.

The following requirements for stakeholder engagement are set out in IFC Performance Standard 1:

"Performance Standard 1 means developing a comprehensive assessment to identify the environmental and social impacts, risks and opportunities of projects, (ii) engage effectively by publicizing project-related information and consulting with them on issues that directly affect local communities, (iii) the client's environmental and social reveals the importance of managing its performance"<sup>2</sup>.

- Stakeholder engagement according to IFC standards, ensures the basis for the Project Owner to establish strong, constructive and sensitive relationships with stakeholders.
- The stakeholder engagement process should be initiated at the earliest stage of the Project lifecycle, in land acquisition, economic and physical displacement and should continue throughout the life of the project.
- An effective stakeholder engagement mechanism ensures that affected communities and other relevant people and organizations are fully informed and meaningfully participate in monitoring the process.
- Stakeholder engagement facilitates provide the identification of avoidance, minimization, mitigation and remediation measures that are appropriate and sustainable.

<sup>1</sup><https://www.ifc.org/wps/wcm/connect/2ee7f9f1-77a3-4739-a9a4-146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jlApldX>

<sup>2</sup><https://www.ifc.org/wps/wcm/connect/2ee7f9f1-77a3-4739-a9a4-146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jlApldX>





Within the scope of IFC Standards, stakeholder engagement of the Project has been developed in line with the principles and strategies set out and explained below.

- a) Information Sharing:** The information sharing studies carried out in the stakeholder engagement process of the project should ensure that the following components are understood by the stakeholders:
- i. The purpose and scale of the project,
  - ii. Duration of the project activities,
  - iii. Risks, potential impacts and related mitigation measures on affected communities defined in the Stakeholder Engagement Plan,
  - iv. Tools and methods of the stakeholder engagement process,
  - v. Access to information on the Grievance Redress Mechanism should be clearly explained.
- b) Consultation:** For an effective stakeholder engagement, the consultation process should comply with the following principles.
- i. Consultations will take place early in the process of identifying environmental and social impacts and risks and will continue as risks and impacts occur.
  - ii. Consultations will be based on transparent, objective, meaningful, accessible information in culturally appropriate narration and in a format that the affected communities can understand.
  - iii. Inclusive participation should focus on directly affected people, before the indirectly affected.
  - iv. There should be no external guidance, intervention or coercion.
  - v. Consultation processes to be carried out should be recorded.
- c) Informed Consultation and Participation:** An informed consultation and engagement process based on the steps in the consultation process stated above will take place when projects have significant impacts on Affected Communities. In this consultation process;
- i. If needed, opinions of both men and women will be obtained through separate meeting or participation methods, and the different concerns and priorities of men and women regarding project impacts, mitigation mechanisms, benefits of the project will be learned.
  - ii. Measures to prevent or reduce negative impacts and risks will be recorded and information will be provided on how the concerns of the affected people are taken into account<sup>3</sup>.
- d)** A procedure will be prepared and implemented within the scope of IFC standards and recommendations on communication and complaint mechanism, which is one of the most important elements of stakeholder relations and stakeholder consultation process.

This procedure should include below items, in accordance with IFC standards clause PS1;

- i. To answer and record external feedback from the public,
- ii. To prioritize and evaluate the issues raised, to determine how to respond,
- iii. To respond, follow and document the answers given,
- iv. To develop the methods required to properly update the stakeholder management program.

<sup>3</sup><https://www.ifc.org/wps/wcm/connect/2ee7f9f1-77a3-4739-a9a4-146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jlApldX>,



Along with the above requirements, in the Performance Standard 1 Evaluation and Management of Environmental and Social Risks and Impacts document published in January 2012 by IFC, "Where there are Affected Communities, the client will establish a Grievance Redress Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance".

According to IFC standards, the Grievance Redress Mechanism should aim to address concerns urgently, using a culturally appropriate, accessible, understandable and transparent consultation process. The party that raises a concern or complaint should not face any price or sanction. The complaint mechanism should not be an obstacle to resorting to legal or administrative remedies.

## 2.4 Stakeholder Engagement in the Covid-19 Process

Covid-19 has changed the working conditions, working culture and habits all over the world. Stakeholder engagement processes were also affected by this case, and institutions revised their stakeholder engagement processes by taking Covid-19 measures into account.

Stakeholder engagement activities of the Project will be carried out both in accordance with the measures taken nationally and according to the international suggestions and updates.

The IFC published its recommendations on health-safe stakeholder engagement activities in COVID-19 conditions on 15 May 2020 (IFC, 2020). IFC stated that in the COVID-19 process, it is necessary to take measures that will also affect stakeholder engagement methods and forms of relationships.

In the document, it was stated that in the Covid-19 period, companies changed the working environment and the business model. Therefore, new risks and opportunities for stakeholders should be evaluated. In the IFC document, it is also stated that companies should provide information about the changes made in this process, new working environment and business models, strategic goals and management of sustainability issues.

Based on the requirements of these current conditions, while preparing the stakeholder engagement plan of the project and planning the stakeholder processes, IFC's "Disclosure and Transparency Framework During COVID-19" (Covid-19 Process Information and Transparency Framework) and "Interim Advice for IFC Clients On" Safe Stakeholder Engagement In The Context Of Covid-1" (Intermediate Recommendation on Safe Stakeholder Engagement in the Context of Covid-19) documents have been taken as a guide.

In the Covid-19 process, the main elements to be taken into account in order to develop safe and effective stakeholder engagement and complaint management, to maintain the proactive communication process and to provide timely information to communities are explained in the Interim Recommendation on Safe Stakeholder Engagement in the Context of Covid-19. The elements in the document are as follows:

- A clear protocol should be defined for external communications and contact points should be determined according to the company's current protocol and communication emergency planning.
- Any stakeholder engagement activity should comply with national and local regulations, as well as advice and guidance from national and international health authorities, and health-related recommendations and guidelines should be followed closely.
- Given the dynamic nature of the COVID-19 situation, companies must be able to adapt their approaches to cope with new or changing needs.
- Critical environmental and social risks that may be exacerbated by the COVID 19 outbreak need to be identified and mitigation measures developed to address these risks need to be communicated to stakeholders.
- Identify critical stakeholder engagement activities planned or ongoing before COVID-19. Decisions to continue planned activities or initiate new ones should be based on a full understanding of potential risks.



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- Multiple alternative channels / tools should be designed or adapted for access to the Grievance Redress Mechanism and external communication, taking into account the local context (urban or rural), current situation and different project activities. Examples include radio announcements, cell phones, bulletin boards, and methods that can be used to provide certain information and disseminate the various communication channels available.
  - Established national / regional / local platforms that are being used as communication forums and tools during the COVID-19 process can be used.
  - Identify existing channels and social structures (eg. community leaders, community-based organizations and women's co-operatives) in communities with limited connectivity and access to technology, or affected groups, or where there are literacy issues.
  - When evaluating the options available for stakeholder engagement in the COVID-19 process, methods should also be developed to ensure the participation of vulnerable and/or marginalized groups. For example, where women, persons with disabilities have limited access, a social support approach that supports access and participation should be designed.
  - An understanding of operational difficulties in communicating key messages such as connectivity, information technology literacy, distance, breach of privacy, fear of retaliation, trust issues, surveillance concerns, and reluctance to rely on proposed alternatives is required.
  - Stakeholder engagement approaches should be reviewed and adjusted to reflect the applicable national and local regulations regarding changing conditions from COVID-19. Approaches should be adapted to better meet the objectives of the project, engagement process, and complaints management, and flexibility should be maintained to adapt to these changes.



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## 2.5 Pre-Performed Stakeholder Engagement

For the Project, during the preparation phase, a petition will be written by Paksel Kimya to the Environmental Directorate and the Organized Regional Directorate regarding the project.

Since the project is not covered by the EIA Regulation, public participation meetings and stakeholder information activities, which are defined within the scope of the EIA and required to be held during the EIA process, have not been carried out.



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## 3.0 DEFINING THE STAKEHOLDERS

Stakeholder analysis is the first step of the stakeholder engagement process. Project stakeholders are defined as individuals or groups who may be positively or negatively affected by the project, directly or indirectly, or who are related to the results of the project, even if they are not in the affected status, or who can affect these processes, and want to express their opinions. In the stakeholder determination process, a broad approach has been adopted that includes all stakeholders related to the Project. A comprehensive approach that will include all of the project stakeholders will also allow the Project to be evaluated and managed properly in all aspects.

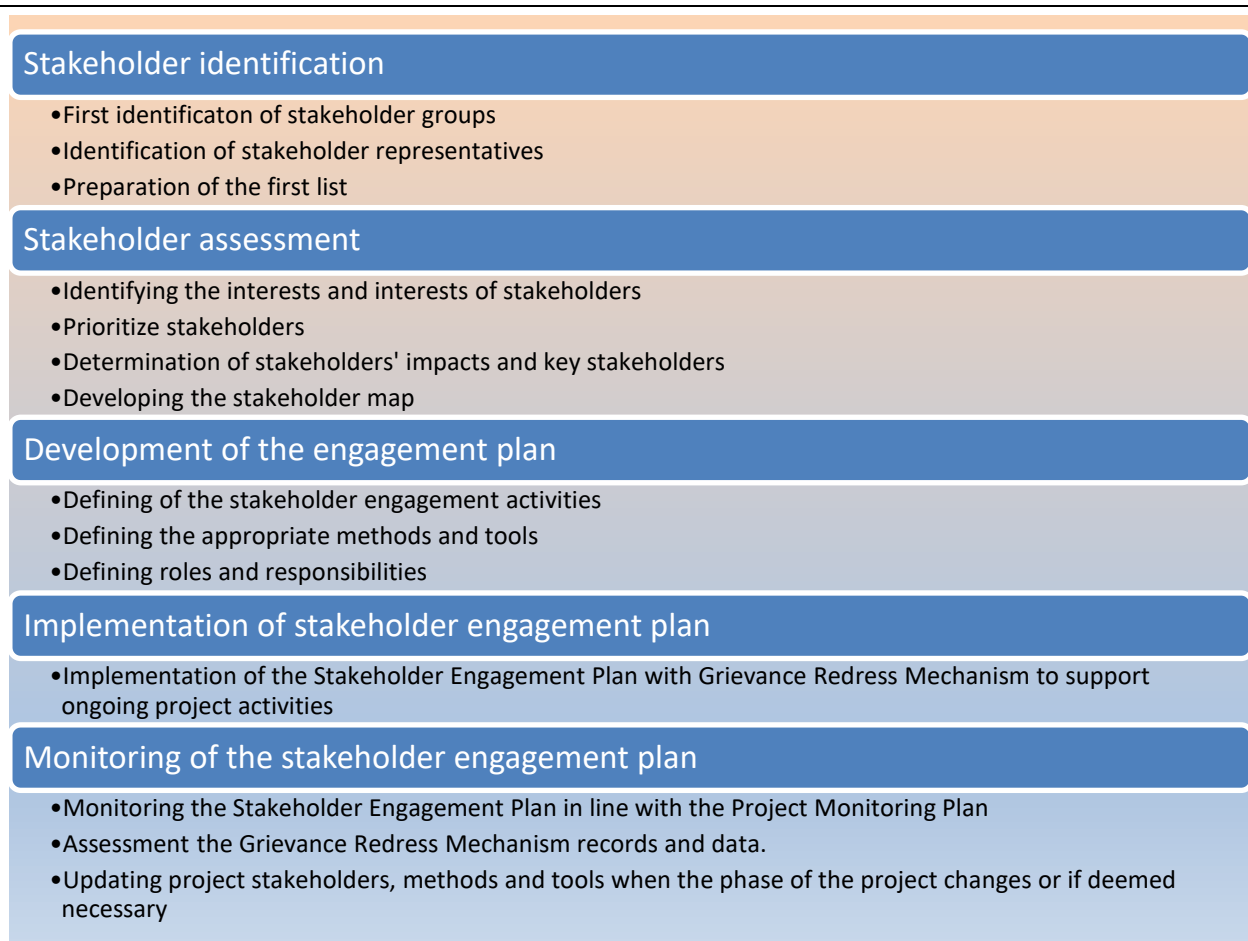
### 3.1 Stakeholder Identification Approach

Stakeholder analysis should be considered as the basis of stakeholder engagement management. Stakeholder identification is not only a work done at the beginning of the SEP process. When reaching to different phases of the project or when activities change, it's necessary to include new stakeholders affected by the project in the Project process. Therefore, while the Stakeholder Engagement Plan is implemented, monitoring and evaluation activities play a very important role in the process of updating stakeholders and tools.

The strategic approach will be followed for the Stakeholder Engagement Plan is shown in the diagram below. This approach reveals that stakeholder identification and updating the studies will take place in all stages of SEP. In this sense, defining the stakeholders is not considered as a completed stage at the beginning of the Stakeholder Engagement Plan, but as a process that is followed up and monitored throughout the Project lifecycle.

A stakeholder-oriented approach is adopted in all stages of the preparation, execution and monitoring of the stakeholder engagement plan.





*Figure 3-1: Strategy of the Stakeholder Engagement*

The strategy and approach defined above has been applied to the development of the Stakeholder Engagement Plan of the Paksel Kimya Capacity Extension Investment as follows:

### 1. Step: Identification of the Stakeholders

According to the phases of the Project, the stakeholders in the following categories have been identified as the stakeholders directly affected / indirectly affected by the Project or interested in the project results.

- International or national organizations,
- National / regional / local governmental agencies or authorities,
- Local governments,
- People affected directly or indirectly and public living in close settlements,
- Management of ÇOIZ and other Industrial Plants in ÇOIZ and around,
- National or local NGOs operating in the field of activity of the Project or in environmental-social areas,
- Professional chambers, trade / industry / agriculture chambers, cooperatives, sectoral organizations, labor associations or unions,
- Local and/or national media,
- Vulnerable groups: the elderly, the disabled, female-headed households, landless-poor households and/or persons, ethnic minorities, immigrants, refugees, etc.
- Suppliers, service providers,
- Project employees.

Stakeholders defined under these categories are assessed according to their impacted status and the first stakeholder list is developed. Stakeholder representatives have been identified in this process.



Within the scope of the project, status of the stakeholder affected by the project is assessed not only physically but also socially, environmentally and economically. The broader definition and detailed explanations of these impacts are given in the Environmental and Social Management Plan (ESMP)<sup>4</sup> of which this SEP is a part.

## **2. Step: Assessment of the Stakeholders**

The identified stakeholders were reviewed by Project experts, managers and consultants. At this stage, the geographical impact area of the project has been determined according to the project phases. At this stage, not only the working area of the Project but also,

- All institutions and facilities within the ÇOIZ,
- Persons or organizations that carry out agricultural or animal activities, farms, workshops, handicrafts, crafts, trade activities outside the ÇOIZ,
- Other users of the roads used by the Project vehicles and heavy vehicles included in the Project activities: These users are the people live in the surrounding settlements, students and personnel of the schools, workers of surrounding workplaces and livelihood facilities.

Considering the phases of the project, the impact of the stakeholders on the project and their level of impacts and interests have been determined.

The phases of the project are as follows:

- Project Development Phase (completed)
- Disassembly / Installation Phase: (ongoing)
- Operation / Production Phase (September 2021)

Stakeholders will be assessed and updated throughout the project period.

## **3. Step: Developing the engagement plan**

The SEP has been developed according to the project phases and activities. Methods and tools suitable for the project's content, needs and the social, economic and cultural conditions of the identified stakeholders were determined.

The roles and responsibilities within the project are planned according to the human resources structure and workflow of the Paksel Kimya in order to carry out the stakeholder engagement plan together with the Grievance Redress Mechanism to support ongoing project activities.

## **4. Step: Implementation of the SEP**

Stakeholder engagement plan will be implemented to support the project activities. During the project activities, information meetings, consultations for stakeholders will be implemented through the tools of the stakeholder engagement plan and in accordance with the schedule.

All complaints, opinions and suggestions of stakeholders will be recorded, evaluated and finalized in accordance with the Grievance Redress Mechanism procedure.

## **5. Step: Monitoring the SEP**

The monitoring of the SEP and GRM will be carried out both by Paksel Kimya and the Consultant as assigned for monitoring the ESMP and SEP of the Project as defined in the ESMP.

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<sup>4</sup> Paksel Kimya Capacity Extension Investment ESMP, March 2021



## 3.2 Stakeholders

The classification and definition of the stakeholders has been determined according to the approach and steps described above. Stakeholders are given in the table below.

Table 3-1: Stakeholders

	Stakeholders	Impact Status		Interested
		Directly	Indirectly	
	<b>İç Paydaşlar</b>			
Financial Institutions	TKYB	X		X
	Project staff and managers	X		X
	Paksel Kimya Employees	X		X
	Subcontractors	X		X
	Consultant (Stantec)	X		X
	<b>Dış Paydaşlar</b>			
Government agencies	- Tekirdağ Governorship			X
	- Kapaklı District Governorship			X
	- Çerkezköy District Governorship			X
	- Ministry of Environment and Urbanization Tekirdağ Provincial Directorate			X
Çerkezköy Organized Industrial Zone (ÇOIZ)	- ÇOIZ Directorate	X		X
	- Factories and companies in the immediate vicinity and/or neighboring parcels in ÇOIZ	X		X
	- Institutions and organizations in ÇOIZ	X		X
Local Governments	- Kapaklı Municipality			X
	- Çerkezköy Municipality			X
Chambers / Unions	- Çerkezköy Chamber of Industry and Commerce			X
Settlements Mukhtars	- Karaağaç Neighborhood	X		
	- İsmet Paşa Neighborhood	X		
	- G.O.P. Neighborhood	X		
	- Yıldırım Beyazıt Neighborhood	X		
Muhtarlıklar	- Karaağaç Neighborhood	X		
	- İsmet Paşa Neighborhood	X		
	- G.O.P. Neighborhood	X		
	- Yıldırım Beyazıt Neighborhood	X		
Local Media				X
Universities / Institutes	- Tekirdağ University			
Local NGOs				X
Local Stakeholders	- Kapaklı local suppliers / service providers	X		X
	- Çerkezköy local suppliers / service providers	X		X
Potential Stakeholders	- Surrounding primary and secondary schools, high schools			
	- Buyers / customers / traders in the business phase			
	- Raw material providers			
	- Vulnerable Groups: Project-affected persons with disabilities, female-headed households, landless-poor households / persons, ethnic minorities, migrants, refugees, etc. in all project affected settlements and groups..			

### 3.2.1 Key Stakeholders

Key stakeholders are significantly affected by the project and have a direct and significant impact on the project. Key Stakeholders can consist of both internal and external stakeholders. Identifying key stakeholders is one of the important stages in the stakeholder analysis process. It is important to clearly identify key stakeholders for the success of the social, environmental management and stakeholder engagement process.

In the briefing and consultation meetings with key stakeholders, the issues, concerns and questions related to the Project, as well as the recording, feedback and consultation activities will be carried out. The diagram below shows the key stakeholders of the Project.

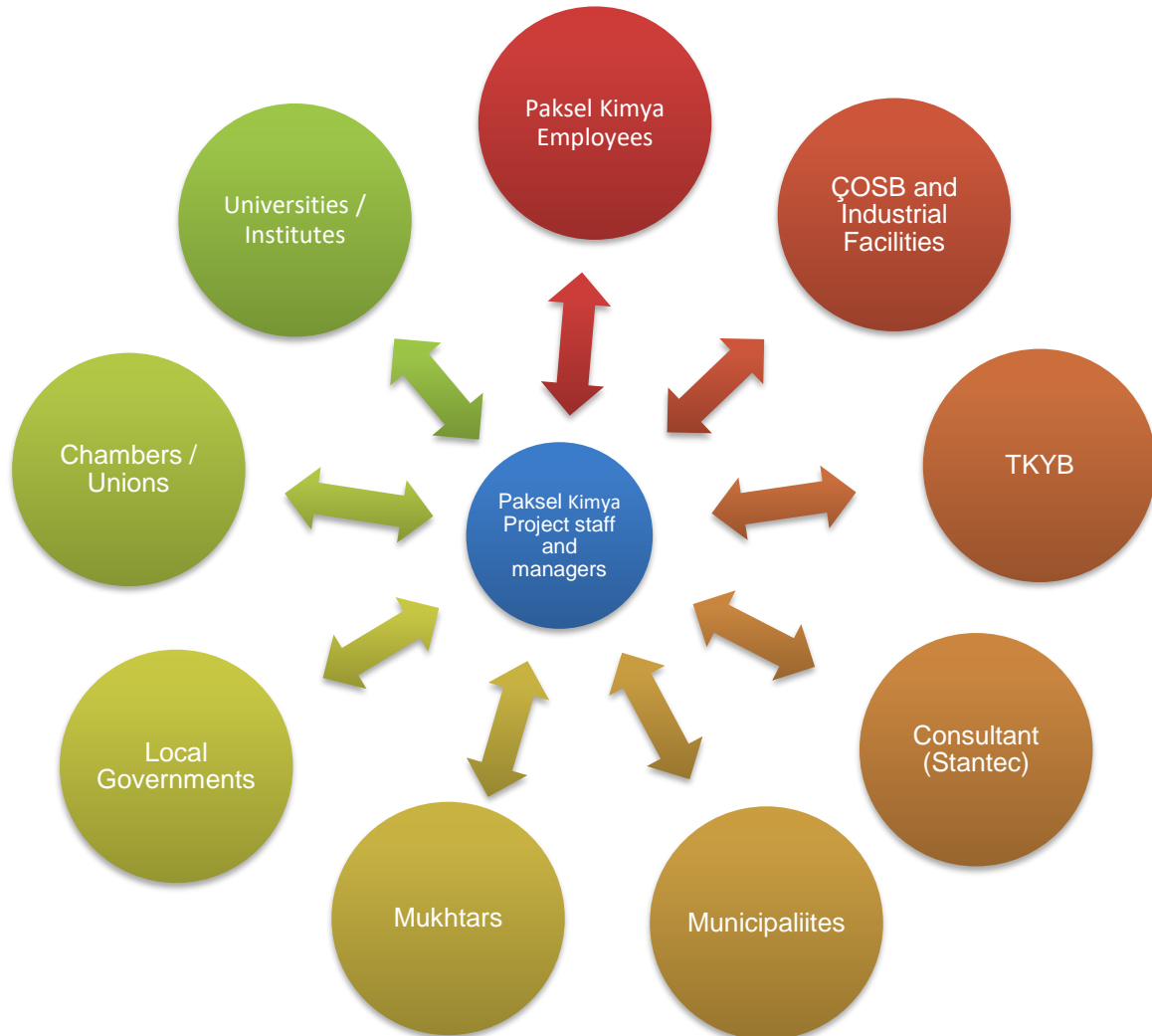


Figure 3-2: Key Stakeholders

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### 3.3 Roles and Responsibilities

The units and persons responsible for the execution of the Paksel Kimya Sanayi ve Ticaret A.Ş..Capacity Extension Investment Stakeholder Engagement Plan and the operation of the Project Grievance Management Mechanism and their roles and responsibilities are defined in detail in the table below. The Project Unit, which will carry out both Stakeholder Engagement activities and the management of the grievance mechanism and in line with the plans developed for social and environmental issues, will serve under the coordination of the person designated as the Project Coordinator and report to the Factory Manage.



Table 3-2: Roles and Responsibilities

ROLE	RESPONSIBILITIES
Factory Manager	<ul style="list-style-type: none"> <li>• To provide the necessary resources for the approval and implementation of this Plan.</li> <li>• To follow up the performance of the Plan by making the necessary assignments.</li> </ul>
Project Coordinator	<ul style="list-style-type: none"> <li>• Coordinating the project's activities related to this Plan,</li> <li>• Managing the Project's Stakeholder Engagement process.</li> <li>• Checking and approving the subcontractors' compliance with the management plan and supervising their implementation performance,</li> <li>• To follow up in order to develop and improve this Plan and to provide feedback to the relevant units about the identified deficiencies and improvement suggestions</li> <li>• Ensuring the operation of the Grievance Mechanism Procedure (GRM) and reporting to the general manager by monitoring.</li> <li>• To ensure healthy communication with all stakeholders within the framework of the plan,</li> <li>• To monitor this Plan in order to develop and improve it, to make relevant audits and revisions</li> </ul>
Stakeholder Engagement Activities Planning and Implementation Officer	<ul style="list-style-type: none"> <li>• To plan stakeholder engagement activities, to ensure that they are implemented according to the SEP and schedule,</li> <li>• To inform the employees / sub-employers about this Plan,</li> <li>• Identifying the deficiencies / errors of the subcontractors in the implementation of the Plan, then communicating the situation to the subcontractor firm in writing, providing the necessary technical support to make the relevant measures / regulations,</li> <li>• Conducting field studies.</li> <li>• Coordinating communication with local people in emergencies</li> </ul>
GRM Officer	<ul style="list-style-type: none"> <li>• Implementing the Grievance Mechanism</li> <li>• To record complaints, to give actions, to follow the complaint closure process, to fulfill the complaint evaluation process as defined in GRM.</li> <li>• Evaluating the corrective actions of the relevant units, consulting with the stakeholder and ensuring its implementation, closing the complaint</li> <li>• Telephone, mail, written and verbal ways, web page, mail, etc. to record the complaints received by vehicles in the complaint mechanism and to operate the complaint mechanism</li> <li>• To carry out the process by recording the complaints and notifications received from the stakeholders in the field in the complaint mechanism,</li> <li>• In the Grievance Mechanism, to examine and evaluate, plan corrective actions, consult with stakeholders and close the complaint as defined in GRM</li> <li>• Monitoring the results of corrective actions in the Grievance Mechanism and reporting to the relevant person</li> </ul>
Health and Safety Specialist	<ul style="list-style-type: none"> <li>• To ensure that the activities carried out within the factory are carried out in accordance with the Plan</li> <li>• To evaluate the performance of this Plan and to inform the relevant people about the deficiencies detected and improvement suggestions in order to ensure continuous improvement.</li> <li>• Informing the relevant person by recording the complaints received from the employees.</li> <li>• When complaints about Occupational Health and Safety (OHS) are received, follow-up according to the action taken and to do the necessary work, to plan corrective actions on OHS issues.</li> <li>• To carry out the review and evaluation of the actions taken in the Grievance Mechanism as defined in the GRM to plan corrective actions, to consult with the stakeholder and to close the complaint.</li> </ul>

During the project, the organizational structure of the "Project Unit", which will fulfill and manage the requirements of the Stakeholder Engagement Plan and the Grievance Mechanism Management Procedure, has been designed as follows:



*Figure 3-3: Project Unit Organization Chart*



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## 4.0 Tools and Methods for Stakeholder Engagement

Tools and methods defined for stakeholder engagement; It has been diversified and expanded in order to enable all stakeholders to access the Project with the vehicles they prefer and are most easily accessible to.

Covid-19, which started in the first months of 2020 and whose effects are still ongoing, required a planning that prioritizes safety and health in the stakeholder engagement process. For this reason, stakeholder engagement activities will be carried out using appropriate methods in line with Covid-19 measures and restrictions.

The tools and methods defined for stakeholder engagement have been diversified and expanded in order to ensure that all Stakeholders access the Project with the tools they prefer and are most easily accessible to.

Covid-19, which started in the first months of 2020 and whose effects are still continuing, required a planning where safety and health are priorities in the stakeholder engagement process. For this reason, stakeholder engagement activities will be carried out in line with Covid-19 measures and restrictions, using appropriate methods.

While the tools and methods are defined, internal and external complaint management tools currently used by Paksel Chemistry are included as part of the SEP's tools.

**Project Website:** The project website will be one of the tools that are active in the stakeholder engagement process during the operational period. The project website will contain announcements, documents, reports, contact addresses (phone, e-mail) of the relevant persons who can be reached on the Project related issues and project e-mail address during the operational period, and there will also be a section containing the explanation of the functioning of the grievance mechanism.

**E-mail addressed to external stakeholders a:** Stakeholders can be reached via e-mail by the Project authorized persons on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested. The project's contact e-mail address will be notified to the employees through the SEP meeting and the leaflet. The feedback will be recorded in the grievance mechanism and the process will be operated.

**Project Hotline:** A telephone line will be defined so that the project stakeholders can reach the Project and convey their complaints, opinions and suggestions. This phone number is especially planned to ensure more active participation of stakeholders who have problems in accessing the internet in the participation process. The phone number will be posted on stakeholder institutions such as provincial directorates, municipalities, the mukhtars of the affected surrounding settlements, and public spaces shared by them.

**Online meetings:** In the Covid-19 process, consultation and information meetings will be held especially with Key Stakeholders using online meeting tools. In these meetings, if deemed necessary and with the consent of all stakeholders, registration can be made. Online interviews can also be used to apply research techniques such as in-depth interviews, surveys, focus group meetings to monitor and evaluate, obtain information, and collect data, if needed.

**Grievance Redress Mechanism:** The GRM is an important stakeholder engagement management tool and method to be used throughout the project, which will include the operation of the process where the notifications, feedback, information and complaints of the stakeholders will be kept. The complaints will be evaluated and monitored, and the results will be consulted to the stakeholders with feedback.

**ALTERNATIVE TOOLS:** It is planned to use the following tools and methods simultaneously to ensure stakeholder participation of disadvantaged groups, illiterate groups, disabled people and refugee groups with language problems, who do not have access to the Internet, smartphones, social media or e-mail.

**Letter / post:** Project brochures, advertisements, reports or announcements can be sent via cargo or letter when necessary, so that disadvantaged stakeholder groups or individuals who do not have access to the



Internet, smartphones, social media or e-mail can access Project information and become part of the Stakeholder engagement process effectively.

**Including general information on billboards in public places or public areas:** It will be ensured that the announcements and information posters of the communication channels related to the Project will be posted on the boards in common public areas in the surrounding settlements, mukhtars, municipalities, provincial directorates, stakeholder professional chambers.

**Poster / Brochures / flyers:** Brochures / flyers with communication channels, announcements and information about the Project will be left in common public areas in surrounding settlements.

**Publishing announcements / advertisements in the local press:** Announcements and announcements will be made in the written and visual media at the stages and situations required by the Project.

**Project grievance boxes for external stakeholders:** Complaint boxes, including simple-to-use forms where stakeholders can convey their complaints, suggestions and opinions, will be placed at points accessible to particularly disadvantaged stakeholder groups and vulnerable groups affected by the Project.

**Wish, complaint and suggestion boxes for employees:** In order for Paksel Kimya employees to share their wishes, complaints and suggestions with the management, complaint boxes will be placed in common areas where employees can easily reach; Complaints or suggestions submitted through this tool will be recorded and evaluated within the Project grievance mechanism like all other complaints / suggestions and notifications.

**Survey form / feedback forms:** The questionnaire and feedback forms will be available online on the project website, shared as a link in social media accounts or e-mail environment, and they will be available in printed form at the points where the complaint boxes are located at stakeholder institutions. It will be prepared / updated regarding the subjects to be collected and to receive feedback within the scope of the phase or activities of the Project

**Survey:** Survey studies will be used when data collection is required in project phases / processes, and it is planned to be carried out online in the Covid-19 process via online tools.

**Stakeholder visits:** In the Covid-19 period, it was suggested that stakeholder visits should not be made unless absolutely necessary. It will be planned as required by social distance and hygiene rules in cases where project materials need to be delivered in printed form or when direct meeting with headmen is important for stakeholder engagement.

**In-depth Interviews:** In-depth interviews will mainly be used as a method of meeting with stakeholders in monitoring processes. However, instead of face-to-face in-depth interviews, in-depth interviews can also be conducted online via online tools in order to reduce the risk in the Covid-19 process.

**Focus Group Meetings:** Focus group meetings can be held whenever there is a need for data collection and qualitative fieldwork during the monitoring process. Focus group work in the form of face-to-face meetings can be carried out online during the Covid-19 process, or can be done face-to-face if the conditions allow after the new normalization process.

**Consultation meetings:** Consultation meetings will be held when needed during the project process. Consultation meetings will be held when needed on issues or periods that require consultation with stakeholders by the Project and will be held in places that will facilitate stakeholder participation to ensure wide participation.



## 5.0 STAKEHOLDER ENGAGEMENT PROGRAMME

Paksel Kimya Sanayi ve Ticaret A.Ş..Capacity Extension Investment Stakeholder Engagement Plan, It has been developed based on the Project impacts defined in the impact assessment study made within the scope of the Project's ESMP. The ESMP has examined the current and potential impacts of the project through the affected communities or individuals. Measures have been developed to eliminate or mitigate the project impacts according to the socio-economic and cultural conditions of the communities affected by the project. Therefore, one of the main objectives of the Stakeholder Engagement Plan, as a component of the ESMP, ensures the management of stakeholder engagement and management of environmental and social impacts.

Stakeholder engagement program table showing the operation of the stakeholder engagement plan of the project is given below. SEP activities, the tool and method of the activity, the location and date of the activity, the responsible person / unit and relevant stakeholder groups are explained. The stakeholder engagement activities of the project are planned separately for the Disassembly / Installing and operation / production phases.

*Table 5-1 : Stakeholder Engagement Program*

Project Phase	Stakeholder Engagement Activity	Tools	Location	Date	Responsibility	Related Stakeholders
<b>DISASSEMBLY / INSTALLING PHASE</b>						
Disassembly / installation phase	Internal stakeholders project evaluation meeting	Online meetings In-depth interviews (online)	Online environment	April 2021	Project Unit, Consultant	Internal stakeholders
Disassembly / installation phase	Internal stakeholders SEP implementation capacity building	Online meetings Email In-depth interviews (online)	Online environment	April 2021	Project Unit,	Internal stakeholders
Disassembly / installation phase	Vulnerable group / disadvantaged group identification interviews for close settlements	Stakeholder (Field) Visit Online meetings In-depth interviews (online)	Online environment Close settlements	April 2021	Project Unit	Headmen of the schools in the close neighborhoods.
Disassembly / installation phase	Traffic density / heavy vehicle traffic information	Stakeholder (Field) Visit Online meetings E-mail Poster / brochure / flyer	Online environment Close settlements	With the start of the dismantling process, 1 week and 1 day before any	Project Unit	Headmen of the schools in the close neighborhoods.



				situation that will cause traffic density / heavy vehicle traffic		companies in the Management companies in the Mukhtars
Disassembly / installation phase	Grievance mechanism and preparation of stakeholder participation information meeting - Getting the contact information of the representatives of the stakeholders - Preparation of announcement and invitation texts - Preparation of SEP and GRM information presentation, - Inviting stakeholders to meetings	Online interview or meetings / face-to-face meetings  Stakeholder visit  In-depth interviews (online)  Local media  Poster / brochure / flyer  Bulletin boards in public places or public areas Letter / post	Online environment Desktop studies	April 2021	Project Unit	All stakeholders
Disassembly / installation phase	SEP and Grievance Redress Mechanism Consultation Meeting	Online interview or meetings / face-to-face meetings	Online environment Face to face	April 2021	Project Unit,	All stakeholders
Disassembly / installation phase	Grievance Redress mechanism, stakeholder information	Online interview or meetings / face-to-face meetings  Stakeholder visit  In-depth interviews (online)  Local media  Poster / brochure / flyer  Bulletin boards in public places or public areas Letter / post	Online environment  Face to face meeting  Site visit	In case of need in Disassembly / installation phase and operation phases	Project Unit,	All stakeholders



Disassembly / installation phase	Informing vulnerable groups (if any) living in the surrounding settlements of the Project site that cannot attend the meeting or have difficult access to the Project grievance mechanism	Site visit Telephone	Online environment Close settlements	April 2021	Project Unit,	Affected vulnerable stakeholders
Disassembly / installation phase	The schools in the close neighborhoods.	Stakeholder Site Visit Online meetings In-depth interviews (online)	Online environment Close settlements	April 2021	Project Unit,	Headmen of the schools in the close neighborhoods.
Disassembly / installation phase	Project process evaluation consultations with key stakeholders	Online interviews / meetings	Online environment	When needed	Project Unit,	Key stakeholders
Disassembly / installation phase	End of the Disassembly / installation phase job / Informing the termination procedures	Online meetings Email In-depth interviews (online) Workplace meetings Face to face meetings	Online environment Factory / workplace	End of the Disassembly / installation phase	Project Unit,	Subcontractor employees, Project employees / workers
Disassembly / installation phase	In case the grievance mechanism is revised during operation / production period, SEP and Grievance Redress Mechanism revised introduction meeting	Online meeting Face to face meeting Email Telephone	Online environment Factory	When revised / changed / added / corrected in disassembly / installation and operation phases	Project Unit,	All stakeholders
Disassembly / installation phase	Operation period recruitment procedures notifications	Online meetings Email Web page Guidance / information for close settlements through the headman	Online environment Close settlements	With the start of the operation phase recruitment studies	Project Unit,	Paksi Kimya employees / workers Relevant Universities and Vocational High Schools Professional chambers



						Neighborhood village Mukhtars
<b>OPERATION / PRODUCTION PHASE</b>						
Operation / Production Phase	Operation period recruitment procedures notifications	Online meetings Email Web page Guidance / information for close settlements through the headman	Online environment Face to face meeting Site visit	September 2021	Project Unit,	Paksi Kimya employees / workers Relevant Universities and Vocational High Schools Professional chambers Neighborhood village Mukhtars
Operation /	SEP and Grievance Redress Mechanism Consultation Meeting	Online meetings Email Bulletin boards in public places or public areas Letter / post	Online environment Face to face information meeting Site visits (to stakeholders who cannot communicate properly online)	The first month of the operation phase	Project Unit,	New stakeholders in the operation phase
Production Phase	Internal stakeholders SEP implementation capacity building	Online meetings Email In-depth interviews (online)	Online environment	The first month of the operation phase	Project Unit,	Internal stakeholders
Operation /	Traffic density / heavy vehicle traffic depending on the shipment	Stakeholder (Field) Visit Online meetings E-mail Poster / brochure / flyer	Online environment Close settlements	With the start of the operation process, 1 week and 1 day before any situation that will cause traffic density / heavy vehicle traffic	Project Unit,	Headmen of the schools in the close neighborhoods. companies in the Management companies in the Mukhtars



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## 6.0 GRIEVANCE REDRESS MECHANISM PROCEDURE

### 6.1 Purpose and Scope

The Grievance Redress Mechanism (GRM) Procedure is one of the basic elements of stakeholder engagement management. It is one of the most important tools of the stakeholder engagement management process that enables stakeholders to convey their problems, complaints and concerns about the project to the relevant units of the project, and to resolve the complaints submitted with the right methods and in a healthy communication.

The Grievance Redress Mechanism Procedure aims to ensure that problems, complaints, or concerns conveyed by stakeholders are dealt with effectively without delay, and to maintain healthy stakeholder engagement based on trust. The Grievance Redress Mechanism Procedure also aims to manage the Grievance Redress Mechanism, which is defined as an important requirement of stakeholder engagement management in TKYB, IFC and international standards, in accordance with the standards.

The Grievance Redress Mechanism Procedure covers all internal and external Project stakeholders and all employees within the Paksel Kimya.

### 6.2 Procedure

The Grievance Redress Mechanism Procedure describes the implementation of the Grievance Redress Mechanism, the grievance management steps, tools, management of the system, and access tools to the Grievance Redress Mechanism.

GRM sets standards and principles to establish safe and constructive and effective stakeholder communication. GRM will be applied throughout the entire duration of the Paksel Kimya Capacity Extension Investment.

The GRM which developed in this context is designed as a completely free, accessible and secure system where stakeholder contact information, complaints from stakeholders, examination and finalization stages are registered and no information is shared with third parties as an adverse manner and data.

The GRM will also be planned and implemented to function as a database for the Project's monitoring and evaluation studies and reporting studies.

### 6.3 Responsibilities

The Project Unit is defined as a unit responsible for the management of the grievance mechanism, which continues its work under the coordination of the Project Unit and reports to the Factory Manager.

Plant Manager, Project Unit Coordinator, Stakeholder Engagement Activities Planning and Implementation Officer, Grievance Mechanism Officer, OHS Officer were determined as authorized employees of the unit.



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## 6.4 Integration of the Grievance Redress Mechanism

The complaint management plans and procedures developed and currently implemented by Paksel Kimya and the tools and methods of these procedures will continue to be used within the Capacity Building Project Grievance Redress Mechanism. Complaints, suggestions and opinions received through these tools will be evaluated and finalized according to the Grievance Redress Mechanism management process described in this Grievance Redress Mechanism Procedure.

Opinions or complaints received by the ÇOIZ Management, one of the key stakeholders of the Project, will continue to be followed up. Each written or verbal complaint or suggestion submitted by the ÇOIZ will be recorded with the contact information of the stakeholder, if any, and will be evaluated within the workflow of the grievance mechanism.

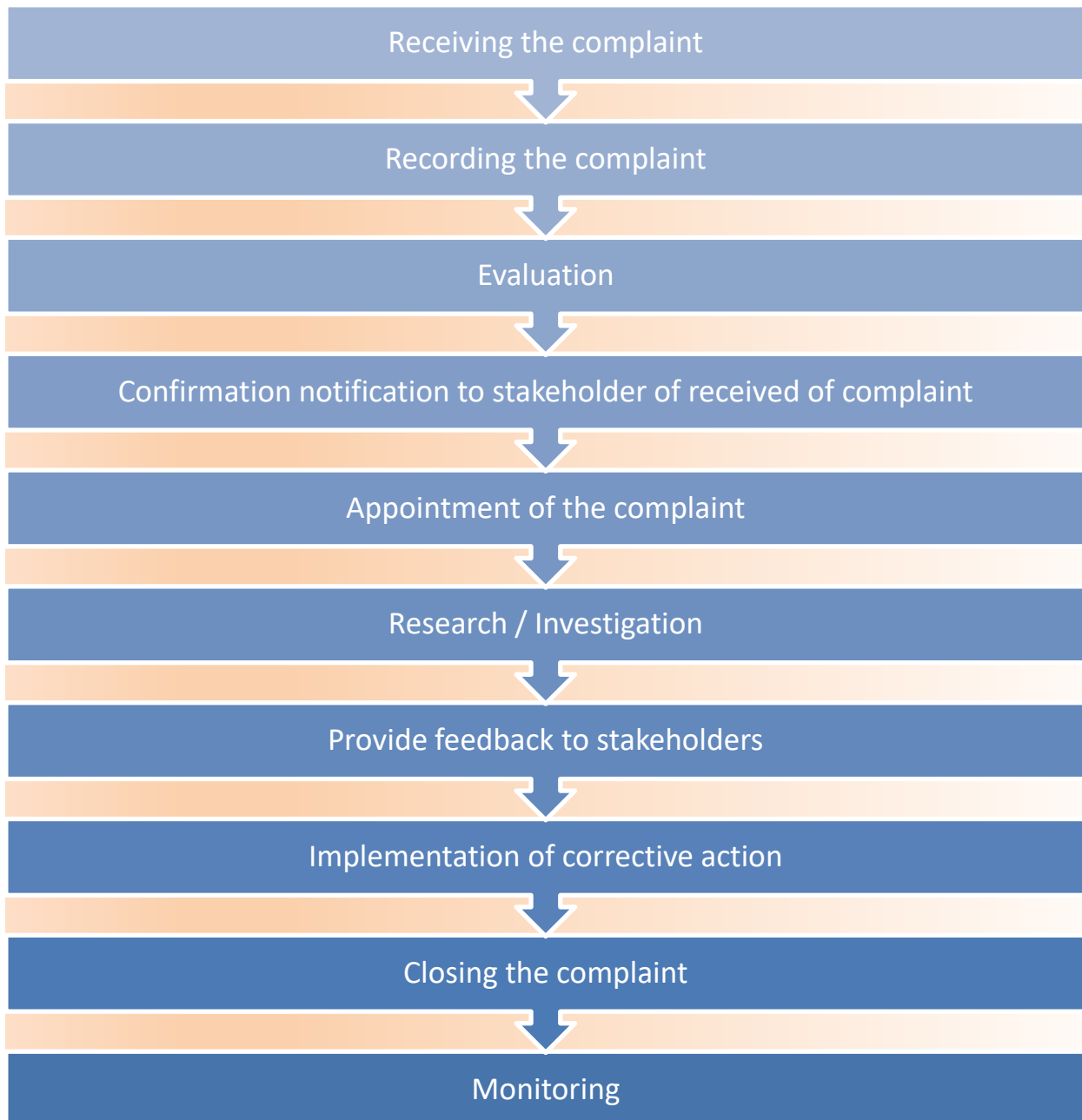
Feedback and result notification for complaints received through this channel will be made to both the ÇOIZ and the relevant stakeholder





## 6.5 Workflow Chart

The functioning of the grievance redress mechanism is shown in the diagram below.



*Figure 6-1: Grievance Redress Mechanism Workflow Chart*

One of the standards required for the successful implementation of the grievance redress mechanism is the completion of the workflow within the defined deadlines.

The main purpose of GRM is not to respond quickly to the complaint or to resolve the complaint quickly. However, complaints that are resolved late or not responded in time may cause new problems. The issue of the complaint may cause more unsolvable issues or the trust problems with the stakeholders.

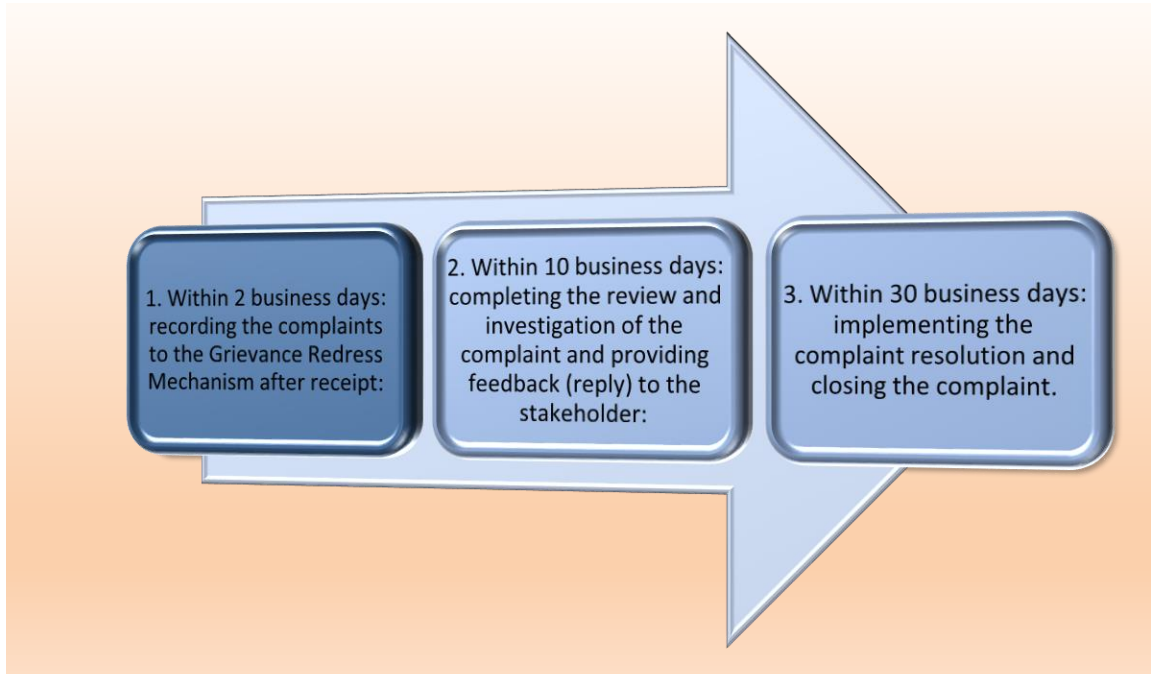
The principles and standards to be followed are detailed in the Principles and Standards table below.

Table 6-1 : Principles and Standards

Workflow Steps		Principles and Standards
Receiving the complaint		Accessible tools to all stakeholders will be used to receive complaints: The stakeholder can submit their complaints through the tools of their choice in line with their own means and preferences. Complaints can be submitted through various contact points such as project web page, Paksel Kimya head office, OSB information line, mail / letter, complaint and wish boxes, email address.
Recording the complaint		Complaints will be recorded within 2 days at the latest by filling out the Complaint Registration Form attached to the SEP: In order to resolve the complaints submitted by the stakeholders in a timely manner, to prevent possible disputes and new problems that may arise from the complaint issue, recording the complaints submitted to the project. duration is determined as 2 days at the latest
Evaluation		The initial assessment will include the nature of the complaint, which unit it is related to, how it will be handled and to whom activation should be given.
Confirmation notification to stakeholder of received complaint		After the assessment, feedback will be given to the stakeholder that the complaint has been received.
Research Investigation	/	At this stage, investigations on complaints will be completed within 10 days with relevant experts. The responsible person examines the source and reasons of the complaint together with the relevant project units. It will register the solution proposal in the system and communicate with the stakeholder.
Provide feedback to stakeholders	to	<p>Remedy feedback should be made within 10 days of the complaint registration. Stakeholder will be informed of corrective action by telephone, SMS, email, online interview tools etc. to respond to the stakeholder. If deemed necessary, social distance and hygiene measures can be taken and face-to-face meetings can be made.</p> <p>The feedback submitted in response is consulted with the stakeholder. In this process, online or face-to-face interviews made using the Consultation form for interviews that are not in written format are recorded.</p>
Implementation of corrective action	corrective action	In order to close the complaint, the solution method that is consulted and agreed with the stakeholder is applied.
Closing the complaint	the	The period for closing the complaint is determined as 30 days The Regulatory Action and Closing Form is shared with the stakeholder by email or face-to-face meeting After the declaration of the acceptance of the stakeholder, the closure form is filled and recorded to the system. Thereby, the complaint is closed and procedure is completed.
Monitoring		Grievance mechanism records will also be monitored during the internal and external monitoring process. In addition, the Project Unit is responsible for monitoring the results of regulatory actions.

One of the standards required for the successful implementation of the grievance redress mechanism is the completion of the workflow within the defined deadlines.

The main purpose of GRM is not to respond quickly to the complaint or to resolve the complaint quickly. However, complaints that are resolved late or not responded in time may cause new problems. The issue of the complaint may cause more unsolvable issues or the trust problems with the stakeholders.



*Figure 6-2: Deadlines of Workflow Steps*

The Project Unit monitors the actions and steps taken to ensure that the investigation is completed within 10 days and closed within 30 days, and when necessary, notifies the person responsible for the follow-up of the complaint.

**Receiving and assessment of anonymous complaints:** When both external and internal stakeholders experience problems, concerns, or difficulties in providing their contact information, identification information, complaints submitted by stakeholders will be initially evaluated and recorded as anonymous complaints or anonymous suggestions.

Stakeholders can send all their wishes and complaints, without specifying their names, to the wish /complaint boxes placed at specific points of the Paksel Kimya, or for external stakeholders they can send all their wishes and complaints, via telephone hotline.

Grievances are received anonymously and assessed by applying the steps defined in the workflow. Within the scope of the complaint, it will be evaluated through investigation / examination processes and each stage will be recorded in the complaint mechanism system. Third parties will not be informed about complaints that need to be kept confidential.

When the complaint is concluded, although there will be no formal feedback on the solution to be implemented, if it is an issue that needs to be informed by the public and if deemed necessary, it can be announced to the stakeholders through common boards/ public and general communication tools.

## 7.0 Appendix

Forms to be used in SEP and GRM

### 1. ŞİKAYET KAYIT FORMU (REGISTRATION FORM)

<b>Talep Kayıt Tarihi:</b> <i>Registration date:</i>				
<b>Talep Türü</b> <i>Type of the registration:</i> <input type="checkbox"/> Şikâyet/ Complaint <input type="checkbox"/> Dilek/ Request				
<b>Talebin ilgili olduğu konu başlığı/</b> <i>Subject heading of the the request</i> <input type="checkbox"/> Çevresel etki /Environmental impact ( <b>ÇE</b> ) <input type="checkbox"/> Sosyal etki geçim kaynakları /Social impact Livelihood ( <b>SEG</b> ) <input type="checkbox"/> Sosyal etki arazilerin zarar görmesi/ Social impact Land Use ( <b>SEA</b> ) <input type="checkbox"/> Sosyal etki hassas gruplar/ Social impact Vulnerable groups ( <b>SEH</b> ) <input type="checkbox"/> Sosyal etki iletişim/ bilgilendirme eksikliği/ Social impact consultation ( <b>SEİ</b> ) <input type="checkbox"/> İSG sorunu/ HS ( <b>ISG</b> ) <input type="checkbox"/> İşçi/ çalışan şikâyeti/ employer complaint ( <b>İÇ</b> ) <input type="checkbox"/> Alt Yüklenici ile ilgili sorun/ contractor ( <b>AY</b> ) <input type="checkbox"/> Trafik ve Ulaşım/ Traffic and Road safety ( <b>TU</b> ) <input type="checkbox"/> Satın alma/ hizmet alımı şikâyetleri / Procurement ( <b>SAH</b> )				
<b>Talebin İletildiği Personel/</b> <i>Personnel receiving the request:</i> <b>Birimi Görevi/</b> Unit/ duty: _				
<b>Talep</b>	<b>Bildiren</b>	<b>Bilgisi/</b>	<b>Stakeholder</b>	<b>information</b>
<b>* Bu alan talep sahibi tarafından tercihinine bağlı olarak doldurulur/</b> <i>This section is filled by the preference of the Stakeholder.</i>				
Talep Sahibi Adı Soyadı/ <i>Name and Surname of the Stakeholder.</i> _ Cinsiyeti/ <i>Gender.</i> Kişinin mesleği kurumu/ <i>Profession institution:</i> Paksel çalışanı ise birimi/ Unit (if stakeholder is an Paksel employee): _ <b>İletişim Bilgileri</b> Telefon Numarası/ <i>Phone number:</i> Email Adresi/ <i>Email:</i> Adres/ <i>Address:</i> <input type="checkbox"/> <b>Kişisel bilgilerimi vermek istemiyorum, kayıtlara bu şekilde geçmesini talep ediyorum/</b> <i>I do not prefer to give my personal information, I request my complaint/ request/ reccommendation is to be recorded in anonymus..</i>				
<b>Talebin/ Şikayetin İlk Ortaya Çıktığı Tarih/</b> <i>Date of the Request /Complaint Occured:</i>				
<b>Talebin Konusu ve Tanımı/</b> <i>Identification of the of the Request /Complaint</i>				
<b>Talebin/şikayetin Ortadan Kalkması İçin Talep Sahibinin Öneri veya Beklentileri/</b> <i>Suggestions or Expectations of the Stakeholder on the Registered Request /Complaint:</i>				
<b>İlettiğiniz konu hakkında size hangi yöntemle geri bildirimde bulunmamamızı tercih edersiniz? Tercihinizi işaretleyiniz. Birden çok seçim yapılabilir/</b> <i>Communication preferences.</i>				

Yüz yüze görüşme ile / *face-to-face consultation*

Telefon ile / *via the telephone*

Lütfen telefon numaranızı yazınız/ *Telephone number of the Stakeholder:*

Email ile / *via the Email:*

Lütfen email adresinizi yazınız/ *Email of the Stakeholder:*

Mektupposta ile / *via post/ letter*

Lütfen size ulaşabileceğimiz adresi yazınız / *Address of the Stakeholder:*

Diğer bir araç veya yöntem ile / *via other communication way*

Size nasıl ulaşabileceğimizi lütfen açıklayınız/ *Please explain the most appropriate way to provide feedback to you:*

Kişisel bilgilerimi ve iletişim bilgilerimi vermek istemiyorum, geri bildirim istemiyorum/ *I do not prefer to give my personal information and I do not to prefer to receive feedback.*

#### **Talep Değerlendirme Bilgisi/ Evaluation information**

**\*Bu alan PAKSEL tarafından doldurulacaktır.**

#### **Kayıt Numarası Oluşturma / Creating a Registration Number**

**Kayıt No/ Registration Number:**

**Bildirim tarihi/ Feedback date:**

**Bildirim aracı/ Feedback tool:**

Telefon/ Phone

Email/ Email

Diğer/ Other

**Talep Değerlendirme Tarihi/ Date of the Evaluation of the Registration:**

**Talebi Değerlendiren Birim Personel/ Unit Personnel Evaluated the Request:**

**Talep Değerlendirme Sonucu/ Evaluation result:**

Kabul / Accepted

Ret / Rejected

#### **Kabul Edilen Talep Bilgisi / Accepted Request/Complaint Information**

**Alınacak Aksiyon/ Action to be taken:**

**Sorumlu Birim Personel/ Responsible Unit Personnel:**

**Termin Tarihi / Date:**



## 2. DÜZENLEYİCİ EYLEM VE ŞİKÂYET KAPATMA FORMU

### (REGULATORY ACTION AND GRIEVANCE CLOSURE FORM) (DE/ŞKF-PKP-Form2)

DÜZENLEYİCİ EYLEM VE ŞİKÂYET KAPATMA FORMU			
REGULATORY ACTION AND GRIEVANCE CLOSURE FORM		DE/ŞKF-PKP-Form2	
Şikayet Kayıt No (Complaint Record Number)		GRM/____/____/____	
<b>1. BÖLÜM: ŞİKAYET İNCELEME SONUCU VE DÜZENLEYİCİ EYLEMLER (inceleme/ değerlendirme sonucu)</b>			
<b>PART 1: RESULT OF THE COMPLAINT EXAMINATION AND REGULATORY ACTIONS (review / evaluation result)</b>			
<input type="checkbox"/> Açık şikayet -Open complaint-		<input type="checkbox"/> Anonim şikayet - Anonymous complaint-	
Şikayet inceleme değerlendirmesini yapan Proje çalışanı: (Project employee conducting the complaint investigation assessment)		Şikayet inceleme değerlendirmesini yapan Proje çalışanı: (Project employee conducting the complaint investigation assessment)	
Proje tarafından yapılan inceleme/ değerlendirme sonucu: (The result of the review / evaluation made by the Project)		Proje tarafından yapılan inceleme/ değerlendirme sonucu: (The result of the review / evaluation made by the Project)	
Planlanan düzeltici eylem(ler)- Planned corrective action (s)	Uygulama tarihi ve süre - Application date and duration:	Planlanan düzeltici eylem(ler)- Planned corrective action (s)	Uygulama tarihi ve süre - Application date and duration:
1.	1.	1.	1.
2.	2.	2.	2.
3.	3.	3.	3.
<b>2. BÖLÜM: AÇIK ŞİKAYET GERİ BİLDİRİM/ İSTİŞARE NOTLARI (Paydaş istişare kaydı)</b>			
<b>SECTION 2: OPEN COMPLAINTS FEEDBACK / CONSULTATION NOTES (Stakeholder consultation record)</b>			
Geri bildirimde bulunulan paydaşın adı soyadı -Name and surname of the stakeholder to whom feedback is given- _____		<b>ANONİM ŞİKAYETLER İÇİN BU BÖLÜM KAPALIDIR!</b> THIS SECTION IS CLOSED FOR ANONYMOUS COMPLAINTS!	
Kişinin mesleği/ kurumu (Paksel çalışanı ise birimi) -Occupation / institution of the person (unit if Paksel employee): _____			
Geri bildirim aracı/ yöntemi- Feedback tool / method:- _____			
Planlanan düzeltici eylem(ler) konusunda paydaşın görüşleri- Stakeholder views on planned corrective action (s):- 1. 2. 3.			
Varsa, paydaşın ek düzenleyici eylem önerileri- Additional stakeholder recommendations for regulatory action, if any:- 1. 2. 3.			
İstişare sonucu düzenleyici eylemlerin nihai hali:- Final state of regulatory actions as a result of consultation- 1. 2. 3.			
Değişiklik olduysa, yeni uygulama tarihleri ve süreleri- New implementation dates and durations, if there has been a change:- 1. 2. 3.			
<b>3. BÖLÜM: DÜZENLEYİCİ EYLEM SONUCU VE ŞİKAYET KAPATMA</b>			
<b>SECTION 3: THE RESULT OF REGULATORY ACTION AND GRIEVANCE CLOSURE</b>			
<input type="checkbox"/> Açık şikayet		<input type="checkbox"/> Anonim şikayet	
Uygulanan düzenleyici eylemlerin sonuçları- Results of the regulatory actions implemented:- 1. 2. 3.		Uygulanan düzenleyici eylemlerin sonuçları- Results of the regulatory actions implemented:- 1. 2. 3.	
Şikayetin ortadan kalkma durumuna ilişkin paydaş görüşü- Stakeholder opinion on the resolution of the complaint:-		<b>Şikayetin ortadan kalkma durumu- Status of the complaint being resolved-</b>	
Paydaşla yapılan görüşme tarihi -Date of meeting with the stakeholder:-		<b>ANONİM ŞİKAYETLER İÇİN BU BÖLÜM KAPALIDIR!</b>	
Paydaşla yapılan görüşme aracı/ yöntemi-Stakeholder interview tool / method:-			



<p><b>Şikayet kapatma paydaş onayı ve onay yöntemi- Grievance closure, stakeholder approval and approval method:</b></p> <ol style="list-style-type: none"><li>1. Sözlü onay</li><li>2. Yazılı onay</li><li>3. İmzalı onay</li><li>4. E-mail/ posta ile onay</li><li>5. Çekimser onay (tutanak veya belgeler forma eklenerek, şikayetin kapatılma koşulları ve nedenleri açıklanacaktır:</li></ol> <ol style="list-style-type: none"><li>1. Verbal consent</li><li>2. Written consent</li><li>3. Signed consent</li><li>4. Confirmation by e-mail / mail</li><li>5. Abstaining consent (minutes or documents will be attached to the form, and the conditions and reasons for the closure of the complaint will be explained:</li></ol>	<p>THIS SECTION IS CLOSED FOR ANONYMOUS COMPLAINTS!</p>
<p>(Eğer varsa) paydaş imzası-Stakeholder signature (if applicable):</p>	<p>Şikayeti kapatan proje uzmanı imzası- Signature of the project expert closing the complaint::</p>

### 3. PAYDAŞ İSTİŞARE FORMU -STAKEHOLDER CONSULTATION FORM (İF-PKP-Form3)

Paydaş İstişare Formu, paydaş görüşmelerinin kaydı, paydaşlarla etkileşim, ziyaret kaydı, paydaşların öneri ve görüşlerinin Şikayet Mekanizmasına kayıt formu aracı olarak kullanılacaktır.

Stakeholder Consultation Form will be used as a tool to record stakeholder interviews, interaction with stakeholders, record visits, and record form of stakeholders' suggestions and opinions to the Grievance Mechanism.

<b>PAYDAŞ İSTİŞARE FORMU-STAKEHOLDER CONSULTATION FORM</b> <b>İF-PKP-Form3</b>				
<b>Paydaş istişare tarihi-Date:-</b> ...../...../202.....				
<b>Kayıt Numarası Oluşturma- Registration Number Creation</b>		<b>GRMİ/ Ay<sup>5</sup>..... /Saat<sup>6</sup>.....</b>		
	<b>Kayıt No- Registration number:-</b>	GM/___/___		
	<b>İstişare aracı/ yöntemi- Consultation tool / method:</b>			
	<b>İstişare nedeni- Consultation reason- Project staff (s) carrying out the consultation:</b>			
	<b>İstişareyi gerçekleştiren Proje personel(leri)- Project staff (s) carrying out the consultation:</b>			
	<b>İstişareye katılan Paydaş(lar)- Stakeholder (s) participating in the consultation:</b>			
	<b>İstişare yeri veya adresi- Place or address for consultation:</b>			
	<b>İstişare konuları- Consultation topics:</b>			
	<b>Paydaşların görüş, öneri veya bildirimleri- Stakeholder opinions, suggestions or statements:</b>	:		
	<b>İstişare özeti ve öne çıkan konular- Consultation summary and highlights:</b>			
	<b>Katılımcı imzaları- Participant signatures:</b>			

<sup>5</sup> Current month (in number)

<sup>6</sup> Complaint recording time (hhmm) in 24 hours



**Stantec Office**

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