



Stakeholder Engagement Plan

Adana Integrated Health Campus Project

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A Company of



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ANNEX A – Comment/Complaint Form

ANNEX B – Complaint Action Form

1.0 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Adana Integrated Health Campus Project (IHC or Project). The Project will be developed by ADN PPP Sağlık Yatırım A.Ş. (ADN PPP A.Ş.) who will be responsible for the design, construction, equipping and maintenance of the IHC within a project period of 28 years, under a Public Private Partnership Agreement with Ministry of Health (MoH). The IHC will involve a Main Hospital (MH), a Physical Therapy and Rehabilitation Hospital (RH) and a High Security Criminal Psychiatric Hospital (FRH), with a total capacity of 1,550 beds.

The SEP is a public document, which presents plans for stakeholder engagement, consultation and disclosure, and is to be updated for each phase of the project. The main goal of the SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts and mitigation measures. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders
- generate a good understanding of the project amongst those that will be affected
- identify issues early in the project cycle that may pose a risk to the project or its stakeholders
- ensure that mitigation measures are appropriate (implementable, effective, and efficient)
- establish a system for long-term communication between the project and communities that is of benefit to all parties.

This version of the SEP is related with the consultation and disclosure activities of Environmental and Social Impact Assessment (ESIA) study prepared for the Project. SEP also summarizes consultation that has been undertaken during the preparation of the ESIA Report and briefly outlines engagement activities related to the construction and operation phases of the Project. SEP is being published at the same time as the Final Draft ESIA Report in order to provide an opportunity for people to comment on the plans related to engagement as well as on the Project. The SEP is the responsibility of ADN PPP A.Ş. and ADN PPP A.Ş. is fully committed to undertaking necessary engagement activities in a manner that is consistent with international good practice as outlined in next sections.

1.1 Project Information

The healthcare system in Turkey is being developed under the Health Transformation Program which was initiated in 2003. The purpose of this program is to increase the quality and efficiency of the healthcare system and enhance access to healthcare facilities with the introduction of a number of reforms. Within the scope of the Health Transformation Program, Ministry of Health has planned to develop 30 Health Campuses in 22 provinces with different sizes and bed capacities to serve 29 health regions among Turkey, which were determined based on the need for health services, geographical structure, patient flow, accessibility and socioeconomic conditions. Until now, 20 Health Campus projects have been introduced which are currently at different stages of planning. Adana Integrated Health Campus Project is one of these 20 projects, which has been proposed by the MoH as part of the public private partnership projects to serve to the 13th health region that covers Adana, Hatay and Osmaniye provinces.

A bid was tendered by the MoH for the Construction Works and the Provision of Products and Services for Adana Integrated Health Campus, and awarded to a joint venture whose pilot members built the current partnership structure in time and established a Special Purpose Vehicle named ADN PPP A.Ş. which is comprised of six companies including Rönesans Holding A.Ş., Rönesans Medikal Yatırımları A.Ş, Meridiam Eastern Europe S.a.r.l., Sila Danışmanlık Bilişim Eğitim İnşaat Taahhüt Ticaret ve Sağlık Hizmetleri Ltd. Şti., TTT Sağlık Hizmetleri Eğitim İnşaat Sanayi Ticaret A.Ş., Şam Yapı Sanayi ve Ticaret Ltd. Şti. The Project's agreement has been signed between MoH and ADN PPP A.Ş. on June 27th, 2013.

Under the terms of the agreement with MoH, ADN PPP A.Ş. will be responsible for the detailed design, construction, equipping, financing, operation and maintenance of the IHC during the 28-year project period. This period covers a 3 year construction period and a 25 year operation period). The provision of medical services will be under the responsibility of the MoH. At the end of 28-year project period, the IHC will be transferred to the MoH.

The Project is located at the south of Turkey in the boundaries of Yüreğir District in Adana Province. The Project will be developed on a 328,820 m² area at the location shown in Figure 1-1.



Figure 1-1. Project Location (yellow shaded area and yellow lines indicate the boundaries of the Project site)

The Project comprises of an integrated health campus with a total capacity of 1,550 beds consisting of three hospitals. These are the 1,300-bed Main Hospital (MH), 150-bed Physical Therapy and Rehabilitation Hospital (RH) and 100-bed High Security Forensic Psychiatric Hospital (FRH). The MH will include the following hospitals:

- 182-bed Oncology Hospital and 185-bed Cardiology and Cardiovascular Hospital
- 349-bed Women/Maternity and Pediatrics Hospital
- 285-bed General Hospital

- 299-bed General Hospital and
- the hospitals' common "Diagnostic and Treatment Center".

In addition to the hospitals, there will be a commercial area to include health support facilities such as pharmacies, doctor's offices, ophthalmic hospital, day chemotherapy and a medical hotel; technical unit building that will house a trigeneration plant and a helipad. The layout of the hospitals is shown in Figure 1-2.

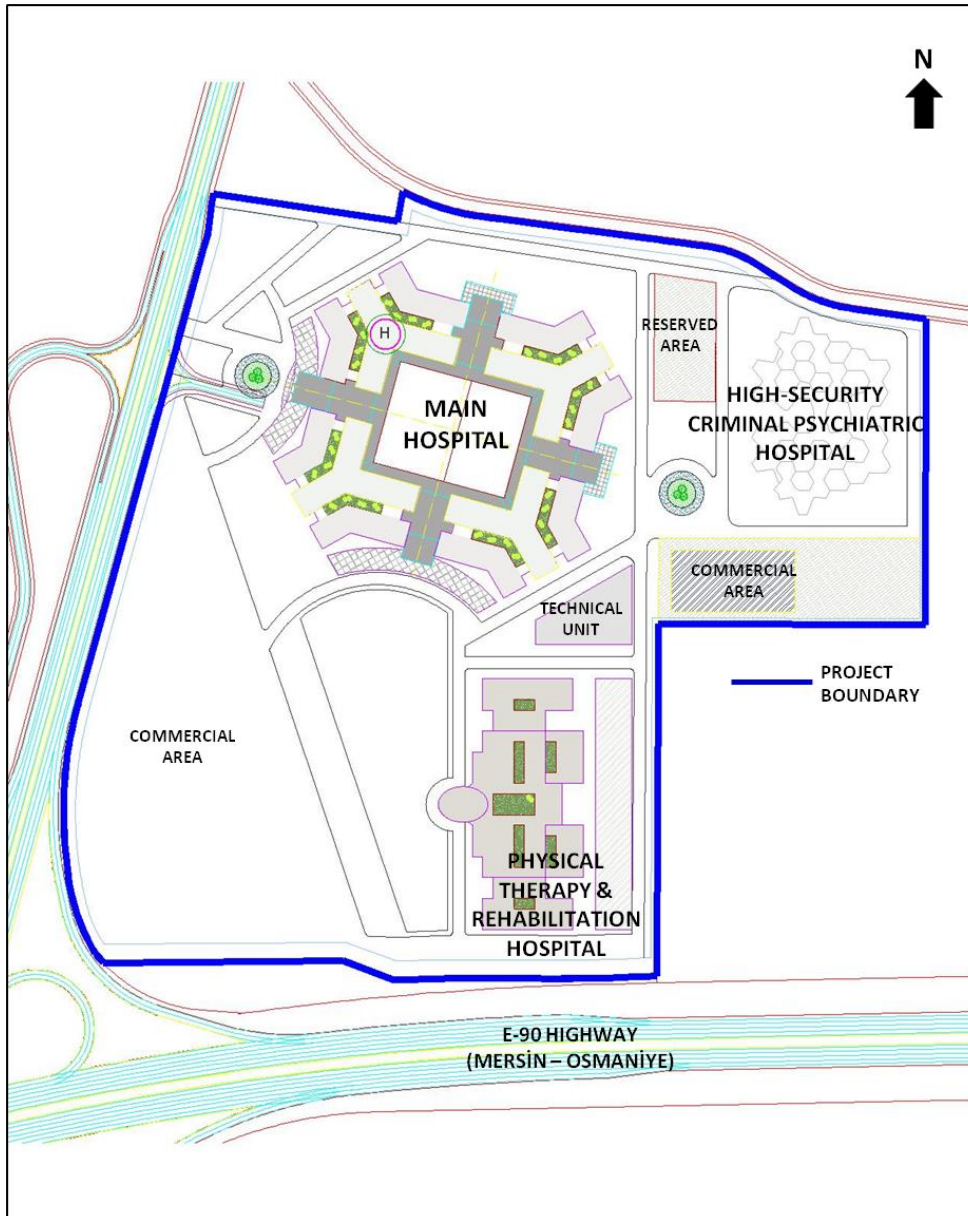


Figure 1-2. Layout of the hospitals

1.2 Project Program

ADN PPP A.Ş. has approached multinational financial institutions (FIs) to fund the development of the Project that include European Bank for Reconstruction and Development (EBRD) and International Finance Corporation (IFC). One of the requirements of these FIs for granting loans is the preparation

of an ESIA Report for identifying potential environmental and social impacts and risks of the Project and developing mitigation measures appropriate to the nature and scale of the Project. An ESIA Report has been prepared to comply with the requirements of IFC Performance Standards (PSs) on Social and Environmental Sustainability (dated 1 January 2012) and European Bank for Reconstruction and Development's (EBRD) Performance Requirements (PRs) (dated May 2008). The ESIA Report is accompanied by an Environmental and Social Management Plan that identifies how significant impacts will be mitigated, managed and monitored during the construction and operation phases of the Project. The ESIA process for the project has started in August 2013 and is planned to be completed by January 2014.

The construction of the Project is estimated to start in the last quarter of 2014 and take up to 36 months. The tentative construction schedule is given in Table 1-1.

Table 1-1. Tentative construction schedule

Works to be undertaken	1 st year				2 nd year				3 rd Year			
	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter
Infrastructure and Mobilization												
Preparation of Implementation projects and their approval												
Construction of Main Hospital												
Construction of Physical Therapy and Rehabilitation Hospital												
Construction of High Security Forensic Psychiatric Hospital												
Construction of Technical Unit												
Infrastructure Works												
Automation and Furnishing Works												
Landscaping and Reclamation												
Testing and Commissioning												
General Cleaning and Disinfection												

2.0 NATIONAL REGULATORY AND INTERNATIONAL REQUIREMENTS

Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette date and number: 03.10.2013/28784) includes provisions for public consultation and disclosure of project information for projects listed in Annex-1 of the regulation. Considering the Adana IHC Project, no EIA procedure has been implemented to date as hospital projects were scoped out of 2008 Turkish EIA Regulation (Official Gazette date/number: 17.7.2008/26939) and therefore no stakeholder engagement was officially needed. The Project also received an official EIA exemption letter from Ministry of Environment and Urban Planning. In addition, there will be a trigeneration plant (maximum 8.6 MW thermal power) inside the IHC which will not be subject to the EIA Regulation due to the fact that the capacity of the trigeneration system is lower than the threshold value that triggers application of the EIA Regulation. As a result, no stakeholder engagement is not required according to the Turkish EIA Regulation for the trigeneration plant as well.

As EBRD and IFC will be potential lenders for the Project, the Project needs to comply with the requirements of EBRD Environmental and Social Policy (May 2008), EBRD PR 10 (May 2008) and IFC PS 1 (dated 1 January 2012). The Project has been categorized as Category B by EBRD. Regardless of the category, EBRD and IFC are committed to stakeholder engagement that is free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

EBRD PR10 (Information Disclosure and Stakeholder Engagement) and IFC PS1 (Assessment and describe stakeholder engagement as an on-going process and in summary require the following:

- (i) identification of stakeholders that are or could be affected by the project, as well as other parties that may have an interest in the project (affected people, communities, businesses and relevant governmental bodies, general public);
- (ii) ensuring that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.
- (iii) maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

In summary, stakeholder engagement should start at an early stage of the ESIA process and continue during project implementation. A grievance mechanism needs to be established as well to facilitate resolution of stakeholder's concerns and grievances about the client's environmental and social performance.

According to best practice and the EBRD/IFC requirements, ADN PPP A.Ş. is now offering consultation opportunities for stakeholders as described in the following sections.

3.0 STAKEHOLDER IDENTIFICATION

3.1 Introduction

For the purposes of this plan, a stakeholder is defined as any individual, organization or group who is potentially affected by the Project or who has an interest in the Project and its impacts. The purpose of stakeholder identification is to identify and prioritize project stakeholders for consultation who may be affected (either directly or indirectly in positive or negative way) by the project or who have an interest in the Project but are not necessarily directly impacted by the project. It is important to note that stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the project.

The key primary stakeholder group will be the local communities within the Project area (particularly related to impacts during construction) and the general public. Other important stakeholders include authorities at national, regional and district level, and non-governmental organizations (NGOs). A number of different stakeholders (as outlined in sections 3.2 to 3.6) have been identified for the Project with responsibilities and interests relevant to the Project and its impacts. A stakeholder database has been established including the name of the representatives and contact details of each stakeholder identified. This database will be reviewed and updated as the project proceeds.

3.2 Surrounding Communities and Facilities

The closest settlements to the Project area are the shanty houses located adjacent to the south border of the Project site. The adjacent land at the east of the Project Site belongs to the State Hydraulic Works (DSI). There are residential buildings (of Housing Development Administration of Turkey (TOKİ)) and Köprülü Elementary School located next to the DSI land, at an approximate distance of 500 m to the Project site. To the west, Adana Riding Center is located which is separated by a road from the Project site. To the north, Chamber of Commerce Anatolian High School is located at a distance of approximately 200 m that is separated by a road from the Project site. These are considered as important stakeholders particularly related to impacts during construction phase such as noise and air quality impacts, and potential traffic increase during construction and operation phases.

To the northwest of the Project site, Seyhan Dam Pond and Hydroelectrical Powerplant is located approximately at a distance of 500 m, which is an important stakeholder related to understanding risks and emergency response plans in case of a dam failure which may affect the Project.

3.3 Neighborhoods

Surrounding neighborhoods (Kisla, Koprulu, PTT, Karacaoglan, Kazim Karabekir, Serinevler, Beyazevler and Ziyapasa neighborhoods) and neighborhoods at a wider distance (approximately within 10 km diameter considering the potential for traffic impacts to be felt up to this distance) were considered that include 62 neighborhoods located in 4 districts (Yuregir, Saricam, Seyhan and Cukurova districts) as given below:

- *Yuregir District*: Selahattin Eyyubi, Yavuzlar, Dadaloglu, Tahsilli, Akıncılar, Kiremithane, Sehit Erkut Akbay, Sarıçam, Atakent, Ulubatlı Hasan, Mutlu, Sinanpasa, Ozgur, Çamlıbel, Dedekorkut, Cumhuriyet, Basak, Yamaçlı, Anadolu
- *Sarıçam District* : Remzi Oguz Arık, Mehmet Akif Ersoy, Yıldırım Beyazıt, Çınarlı
- *Seyhan District* : Yenibaraj, Doseme, Gazipasa, Cemalpaşa, Yesilyurt, Kurtulus, Resatbey, Namık Kemal, Mithatpaşa, Kayalıbağ, Tellidere, Çınarlı, Tepebağ, Ulucamii, Fatih, Kurukopru, Hanedan, Denizli, Hurmalı, Karasoku, Ahmet Remzi Yuregir, Sarıyakup, Turkocagi, Istiklal, Pınar, Alidede, Sakarya, Yesilyuva, Narlica, Sucuzade, Besocak, Emek, Ismetpaşa, Bahcelievler
- *Cukurova District*: Mahfesimaz, Guzelyali, Toros, Karslılar, Huzurevleri

3.4 Hospitals

It is not clear at this stage whether any state hospital will be closed related to the Adana IHC Project. There are 11 public, 13 private, 2 university and 1 military hospital in Adana which have been identified and included in the stakeholder register.

3.5 Governmental Organizations

Governmental organizations can be grouped as national, provincial, district and neighbourhood/village levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. A list of governmental agencies relevant to the Project has also been prepared as given below:

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Ministry of Health (MoH), General Directorate of Health Investments	The Project has been proposed by MoH. MoH will be responsible for the provision of medical services during operation phase of the Project.
	MoH, General Directorate of Management Services	
	MoH, Public Hospitals Institution	
	MoH, General Directorate of Health Services	
	MoH, General Directorate of Emergency Health Services	
	MoH, Public Health Agency of Turkey	
	Ministry of Environment and Urban Planning (MEUP), General Directorate of EIA, Permit and Audit	MEUP has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting.
	MEUP, General Directorate of Environmental Management	
	MEUP, General Directorate of Spatial Planning	
	MEUP, General Directorate of Protection of Natural Assets	
	Ministry of Forestry and Water Affairs (MoWA), General Directorate of State Hydraulics Works (DSI)	These organizations may have specific views on protected sites, lakes and dams close to the Project site (The Project site is located close to Seyhan Dam, Seyhan River and DSI channel).
	MoWA, General Directorate for Nature Protection and National Parks	
	Ministry of Labor and Social Security (MoLSS), General Directorate of Labor	MoLSS may have specific views on labor and working conditions, and health and safety of healthcare personal.
	MoLSS, General Directorate of Occupational Health and Safety	
	MoLSS, Social Security Institution	

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
Regional	Adana 6 th Regional Directorate of State Hydraulic Works	The Project site is located next to an area that belongs to DSI. The Project site is located close to Seyhan Dam and DSI channel.
	Adana 7 th Regional Directorate of Ministry of Forestry and Water Affairs	There are trees within the site, some of which needs to be fell down.
	Adana Regional Directorate of Labor and Social Security	Specific views may be given related to regional healthcare labor.
	5 th Regional Directorate of General Directorate of Highways	The organization may be involved in works related to the planned cloverleaf junction next to the Project site.
	TEİAŞ 18 th Group Directorate of Transmission, Facility and Operation	An energy transmission line is passing through the Project site, which is planned to be displaced.
Provincial	The Governorship of Adana	The governorship is the highest authority in the province representing national government.
	The Metropolitan Municipality of Adana	The municipality and its relevant departments will have responsibilities relevant to the Project.
	The Metropolitan Municipality of Adana, Department of Transport Coordination	The organization may have specific views on management of traffic related to Project and the planned cloverleaf junction next to the Project site.
	Adana Governorship Provincial Directorate of Health	These organizations are relevant in terms of provision of health services and healthcare labor in the province.
	Adana Governorship Provincial Directorate of Public Health	
	Adana Province General Secretariat of Public Hospitals	
	Adana Provincial Directorate of Social Security Institution	
	Adana Provincial Directorates of Environment and Urbanization (PDEUP)	PDEUP has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting.
	Adana Provincial Directorate of Food, Agriculture and Livestock	This organization may have views related to the presence of fish production pools inside the Project site, which were previously used and currently empty.
	Adana Provincial Command of Gendarmerie	This organization has a function to provide security of the High Security Criminal Psychiatric Hospital.
	Adana Disaster and Emergency Management Directorate	This organization has a function to manage and respond to emergency cases.
	Adana Provincial Directorates of Culture and Tourism	This organization may provide a specific view related to archaeological potential of the Project site.

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
District	The Local Governorship of Yüreğir, The Municipality of Yüreğir	The Project site is located in Yüreğir District, and both the Local Governorship and the Municipality of Yüreğir are stakeholders regarding obtaining relevant permits, approvals and consents during planning, construction and operation of the Project. The other local governorships and municipalities are relevant as the Project covers several hospitals which are important for all the other districts as well.
	The Local Governorship of Çukurova, The Municipality of Çukurova	
	The Local Governorship of Sarıçam, The Municipality of Sarıçam	
	The Local Governorship of Seyhan, The Municipality of Seyhan	
	The Local Governorship of Ceyhan, The Municipality of Ceyhan	
	The Local Governorship of Karataş, The Municipality of Karataş	
	The Local Governorship of Yumurtalık, The Municipality of Yumurtalık	
	The Local Governorship of İmamoğlu, The Municipality of İmamoğlu	
	The Local Governorship of Karaisalı, The Municipality of Karaisalı	
	The Local Governorship of Kozan, The Municipality of Kozan	
	The Local Governorship of Aladağ, The Municipality of Aladağ	
	The Local Governorship of Pozantı, The Municipality of Pozantı	
	The Local Governorship of Feke, The Municipality of Feke	
	The Local Governorship of Saimbeyli, The Municipality of Saimbeyli	
	The Local Governorship of Tufanbeyli, The Municipality of Tufanbeyli	

3.6 Non-Governmental Organizations

A list of key NGOs that may have interest in environmental and social aspects of the Project is also prepared as given below:

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Turkish Medical Association	Turkish Medical Association has previously filed a lawsuit for other three hospitals that are planned to be built through a public-private partnership (PPP) model and in general to the PPP model. It is important to engage with this association to understand their concerns.
	Trade Union of Public Employees in Health and Social Services	These associations together with the Turkish Medical Association has published a notice on negatives aspects of PPPs.
	Trade Union of Revolutionary Health Workers	
	Association of Social Service Specialists	
	Association of All Technicians of Radiology	
	Turkish Dental Association	
	Turkey Trade Union of Health Workers	Trade unions are important stakeholders representing the labor rights of health sector personnel.
	Trade Union of Employees of Health and Social Services	
	Trade Union of All Employees of Health and Social Services	
	White Coat Trade Union of Health and Social Services	
	Trade Union of Medical Workers	
	Trade Union of Health and Social Services' Employees Rights	
	Trade Union of Public Employees in Health and Social Service Branch in Turkey	

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Trade Union of Anatolian Health	Trade unions are important stakeholders representing the labor rights of health sector personnel.
	Trade Union of Active Health	
	Independent Trade Union of Public Workers in Health and Social Services	
	Trade Union of Democratic Employees of Health and Social Services	
	United Trade Union of Public Workers in Health and Social Services	
	Turkish Red Crescent	These associations are relevant social organizations working on different aspects of healthcare sector and may provide specific views on their areas of specialization.
	Turkish Nurses Association	
	Pediatric Nurse Association	
	Oncologic Nurse Association	
	Urology Nurse Association	
	Obstetricians and Nurses Association	
	Turkish Intensive Care Nurses Association	
	Doctors' Rights Association	
	Doctors Association	
	Contemporary Pharmacist's Association	
	Association of Patient's and Patients' Relatives' Rights	
	Association of Health Employees	
	The Health Foundation of Turkey	
	Foundation of Hope in Health	
	Health Tourism Association of Turkey	
	Turkey Confederation of Disabled	Views of these associations are important to understand their expectations.
	Turkey Handicapped Association	
Provincial	Turkish Medical Association Adana-Osmaniye Chamber of Medical Doctors	These organizations are representatives of similar national organizations and may provide specific views related to the issues in the province.
	Trade Union of Employees of Health and Social Services Adana Office	
	Trade Union of Health Workers Adana Office	
	Trade Union of Public Employees in Health and Social Services Adana Office	
	Trade Union for Service of Health and Social Services' Employees	
	Trade Union of Public Employees in Health and Social Service Branch in Turkey Adana Office	
	Turkey Handicapped Association Adana Office	These chambers may provide provincial-specific and or site-specific views related to the project.
	Turkish Red Crescent Adana Office	
	Chamber of Environmental Engineers (Adana Regional Representative Office)	
	Chamber of Urban Planners (Adana Office)	
	Chamber of Civil Engineers (Adana Office)	
	Chamber of Forest Engineers (East Mediterranean Office)	
	Chamber of Architects (Adana Office)	
	Chamber of Geophysics Engineers (Adana Office)	
	Chamber of Geology Engineers (Adana Office)	

4.0 STAKEHOLDER ENGAGEMENT APPROACH

This section provides an overview of the stakeholder engagement approach for different phases of the Project as described below:

- Phase 1: ESIA Study Consultations (completed)
- Phase 2: Final Draft ESIA Disclosure (current phase)
- Phase 3: Construction (future consultations)
- Phase 4: Operation (future consultations)

Phase 1 is already completed and the results of stakeholder engagement activities in this phase are explained in Section 5. Engagement activities for Phase 2 and Phase 3/Phase 4 are provided in Section 6 and Section 7, respectively.

ADN PPP A.Ş. have used/will use different consultation approaches and methods for different phases of the Project activities and for different stakeholder groups. The main communication methods and mechanisms that have been and/or will be used to consult with key stakeholders in each phase are summarized in Table 4-1.

Table 4-1. Project phases and proposed engagement approach

Project Phase	Engagement Approach
Phase 1: ESIA Study Consultations	• Face-to-face meetings with selected governmental authorities • Face-to-face meetings with headmen of the surrounding neighborhoods in appropriate languages • Face-to-face meetings with the surrounding facilities • Sending out Project Information Documents to selected governmental and non-governmental organizations • Sending out Project Information Document and Project Information Leaflets to selected neighborhoods • Newspaper advertisements • Public consultation meeting • Establishing a Project specific email address to collect views • Disclosure of information in the Project website
Phase 2: Final Draft ESIA Disclosure	• Disclosure of Draft Final ESIA Report, ESMP, ESAP and SEP in the Project website • Distribution of hard copies of Draft ESIA Report to district heads of Adana • Newspaper announcements • Public consultation meeting
Phase 3: Construction	• Project website to disclose Project information and Project updates • Newspaper announcements, if needed • On-going communications with relevant regulatory stakeholders and public, as necessary • Implementation of the Grievance Mechanism
Phase 4: Operation	

5.0 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities for the Project have started during the scoping stage of the ESIA and continued during the preparation of the ESIA report. A Project Information Document and Project Information Leaflet was produced in English and Turkish and were sent to identified stakeholders (as provided in Section 3) as explained below:

- Identified governmental authorities (62 agencies) and NGOs (50 agencies) were sent a Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.
- A project information pack (including 5 Project Information Documents, 25 Project Information Leaflets and 25 Comment/Complaint Form) were sent together with a cover letter to headmen of 70 neighborhoods (including surrounding neighborhoods and neighborhoods at a wider distance within 10 km diameter) to provide information on the planned Project and related impacts, ongoing environmental and social impact assessment and to provide opportunity to express views and concerns about the project, and to inform how views/concerns can be submitted. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered. Prior to sending the information, the headmen were contacted by phone to inform them about the aim of the project information pack and they were requested to distribute the leaflets in their neighborhoods.
- A Public Consultation Meeting was held on 8th November 2013 in Yuregir District. 50 people participated the meeting. The meeting was announced via advertisements in one national and two local newspapers thirteen days in advance on 26th October 2013 and the advertisement was repeated at the same newspapers on 1st November 2013. The meeting was opened by the Provincial Health Director followed by a presentation by a representative of the ESIA team. A representative from ADN PPP A.Ş. was also available during the meeting.
- A Project specific email address to be used during the ESIA study was established to collect opinions via email.
- A Project specific website (<http://pppadanahastanesi.com/>) was established where the Project Information Document, Project Information Leaflet and Comment/Complaint Form are made available to the public.

In addition to the abovementioned consultation activities, face-to-face meetings were held with the following governmental authorities.

- Ministry of Health, Department of Public Private Partnership
- Adana Metropolitan Municipality
- Adana Metropolitan Municipality, Department of Adana Transport Coordination
- Adana Provincial Directorate of Health
- 6th Regional Directorate of State Hydraulic Works

Furthermore, a social survey was conducted in the eight nearby neighborhoods (Kisla, Koprulu, PTT, Serinevler, Karacaoglan, Beyazevler, Kazim Karabekir, Ziyapasa), the two settlements (TOKI Houses and shanty houses, both of the settlement fall within the Kisla Neighborhood boundaries), the two

sport clubs (Adana Riding Center and Adana Ozden Amateur Sports Club) and one high school (Adana Chamber of Commerce High School). The survey was conducted between 26th-28th May 2014 with the headmen of the neighborhoods, residents of the two settlements and managers of the sport clubs.

Due to the fact that it was not clear during the ESIA studies whether any hospital will be closed related to the Project, consultation was not made with the hospitals.

The key issues that were raised during the face-to-face meetings with governmental authorities, headmen and facilities and key issues that were mentioned in the official response letters and during the public consultation meeting are summarized below.

Face-to-face meetings with governmental authorities

- Need for clarification of the issue whether a Turkish EIA will be needed for the Project
- Alternative sites considered for the Project location
- Planned light rail system which will have a close stop near the Project
- Need for health campuses so that every party (the MoH and Special Purpose Vehicle) can focus on what they know best which will result in higher quality services

Face-to-face meetings with headmen

- Dust and noise emissions during construction
- Increase in traffic load during construction and operation phases
- Request for further information on FRH
- Necessity of accommodation facilities for patients' relatives
- Positive impacts including job opportunities, easy access to health services and increase in land prices and rents

Face-to-face meetings with facilities

- Dust and noise emissions during construction
- Increase in traffic load during construction and operation phases

Response letters from governmental authorities

- Documentation of the completion of the project bidding process so that the Project is scoped out from the Turkish EIA Regulation
- Waste management and disposal practices
- Waste transportation inside the health campus
- Compliance with Occupational, Health and Safety (OHS) Law and relevant OHS regulations
- Suggestions to have specific units (such as unit related to drug addiction) inside the health campus and specific treatment methods (such as use of sedation methods to small children during dental treatment)
- Inclusion of an oral and dental health center, buildings and services such as accommodation, places of worship, medical supply centers in the health campus

Response letter from Non-Governmental organization

- Need to establish infrastructure for blood supply
- Good location of the Project so that immediate medical response can be provided in the event of disasters
- Employment opportunities

Public

- Access difficulties and increase in traffic load by the Project
- Financing of the project and hospital charges during operation
- Potential hospital closures

6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING FINAL DRAFT ESIA DISCLOSURE

This is the current phase of the stakeholder engagement activities. The disclosure period for the Final Draft ESIA Report will start on 20th June 2014 for a period of 30 days. The objective of the 30-day disclosure period is to inform the stakeholders about the Project activities, impacts, proposed mitigation measures and monitoring.

The following Project documents will be disclosed in English and Turkish languages in the Project website (<http://pppadanahastanesi.com/>):

- **Final Draft ESIA Report** – consisting of main text and supplementary annexes that includes ESMP
- **Non-Technical Summary (NTS)** of the Final Draft ESIA Report
- This **Stakeholder Engagement Plan**
- **Environmental and Social Action Plan (ESAP)**

In addition to the disclosure of documents in the Project website, the following activities will be conducted:

- The hardcopies of the Final Draft ESIA Report will be distributed to district heads of Adana.
- Newspaper advertisements will be placed within the first week of the disclosure period announcing the publication of the Final Draft ESIA Report and the commencement of the consultation phase.
- Within the 30-day disclosure period, a public consultation meeting will be held in Yuregir District to explain the outcomes of the ESIA study and to address questions raised. The public consultation will be announced in the same way as was done during the ESIA studies.

With the start of the disclosure period, comments can be submitted via email or in writing to:

ADN PPP Sağlık Yatırım A.Ş.

Refik Belendir Sok. No: 110/2 Yukarı Ayrancı - ANKARA

E-mail: info@rsy.com.tr

Telephone: 0 312 441 31 41

Fax: 0312 442 59 48

On completion of the disclosure period, the ESIA Report will be finalized by reflecting the comments received during the disclosure period where required. The Final ESIA Report will then be published on the Project website.

7.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING CONSTRUCTION AND OPERATION PHASES

Stakeholder engagement activities will continue during 36-month construction period which will then be followed by engagement activities during 25-year operation period. Consultation activities during construction and operation phases are important in order to maintain constructive relationships both with the local communities and other stakeholders. There will be a Liaison Officer during construction and operation phases who will be the main contact person to handle comments and grievances. Although not finalized yet, planned engagement activities are briefly outlined below. The main engagement methods for different types of stakeholders are also summarized in Table 7-1.

Construction Phase

- Project information will be disclosed from the Project website which will be updated as deemed necessary.
- Ongoing meetings, as deemed necessary with national and local authorities will continue during construction phase related to permitting and other issues.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- Any activities likely to cause particular disturbance (such as noisy activities etc.) to the nearby neighbourhoods will be announced through handouts to be distributed to local people via headmen offices. This information will also be provided in the Project website.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 8.
- The security staff at the construction site will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.

Operation Phase

- The Project website will be updated to include information on operation activities and any changes in environmental policy, plans and procedures that are followed.
- Ongoing meetings, as deemed necessary will be conducted with the national and local communities to inform them of any changes in project activities and related to permitting.
- Ongoing meetings with the Ministry of Health will be conducted as necessary.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 8.
- The security staff at the hospital will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.

Table 7-1. Engagement methods during construction and operation phases

Project Phase	Stakeholder Type	Engagement Approach	Responsibility
Construction	Surrounding communities and facilities	• Project website for Project updates • Implementation of grievance mechanism • Making comment/complaint forms available at the construction site office • Face-to-face meetings with local residents/headman/nearby facilities upon a grievance or if needed • Newspaper advertisements if needed	ADN PPP A.Ş. and Contractor of ADN PPP A.Ş.
	Governmental authorities	• Face-to-face meetings with MoH as needed and other authorities related to permitting issues • Official written correspondence with authorities	
	Construction workers	• Implementation of grievance mechanism • Training on environmental, health and safety aspects • Consultation related to implementation of relevant management plans (i.e. Construction Camp Management Plan)	Contractor of ADN PPP A.Ş.
Operation	Surrounding communities and facilities	• Making comment/complaint forms available at the security gates	Service Provider of ADN PPP A.Ş. or MoH – depending on the subject of comment/complaint
	Employees of ADN PPP A.Ş.	• Project website to disclose Project information and Project updates • Newspaper announcements, if needed • On-going communications with relevant regulatory stakeholders and public, as necessary • Implementation of the Grievance Mechanism	ADN PPP A.Ş. and Service Provider of ADN PPP A.Ş.
	MoH staff	• On-going meetings with the administrative staff of MoH	
	MoH staff	• Implementation of grievance mechanism	MoH
	Patients and Patients' visitors	• Establishment of a Patient Communication Unit inside the IHC in line with Patient Rights Regulation	

8.0 SCHEDULE FOR ESTABLISHMENT OF THE PROJECT

The schedule for disclosure and consultation activities and the proposed tentative timeline for future activities of the Project are provided below:

Milestone	Schedule
Final Draft ESIA Report disclosure	Starts on 20 th June 2014 for a period of 30 days
Public consultation meeting	Between 20 th June - 20 th July 2014
Finalization of ESIA Report	Within third quarter of 2014
Start of construction activities	Last quarter of 2014 for a period of 3 years
Start of operation activities	Last quarter of 2017 for a period of 25 years

9.0 GRIEVANCE MECHANISM

A grievance mechanism will be established in order to ensure that all comments, suggestions and objections received from the project stakeholders especially from the nearby surrounding communities and facilities are dealt with appropriately and in a timely manner. It is important to note that there will also be a separate grievance mechanism for workers during construction and operation phases, and for patients.

Local communities will be informed about the grievance mechanism during the consultation and disclosure activities. All grievances will be recorded, responded and resolved in a defined timeframe. A Comment/Grievance Form is presented in Annex A. Comments and grievances can be sent to ADN PPP A.Ş. via mail or e-mail during the construction and operation stages as well as through the Project website.

The procedure to handle grievances is described below:

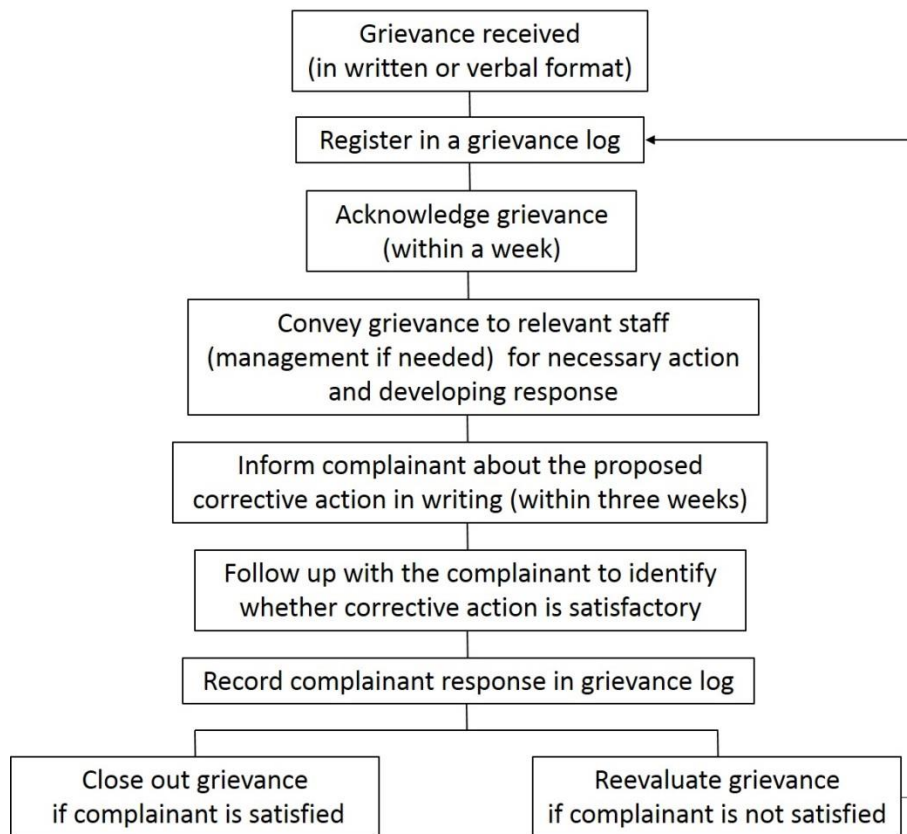
1. All grievances submitted by the stakeholders in verbal and written will be considered. Verbal grievances will be written on grievance forms by the responsible person (i.e. liaison officer).
2. All grievances will be reflected in a grievance log to ensure that each grievance is assigned an individual number and that consistent tracking and corrective actions are carried out. The grievance log will contain:
 - Date of submission of the grievance
 - Reference number
 - Contact details of the complainant
 - Content of the grievance
 - Identification of parties responsible for the resolution
 - Dates when the investigation was initiated and completed
 - Findings of the investigation
 - Proposed corrective action
 - Date of response sent to the complainant (unless it is anonymous)
 - Statement of satisfaction of the complainant
 - Date of closing out the grievance
 - Any outstanding actions for non-closed grievances
3. The grievance will be formally acknowledged within a week after submission. If the grievance is not well understood or if additional information is required, complainant will be contacted for clarification.
4. The grievance will first be evaluated by the liaison officer and then conveyed to the relevant staff and management, if necessary to identify what actions need to be taken, and an appropriate response will be developed. The complaint action form will be filled in as presented in Annex A.
5. The complainant will be informed about the proposed corrective action in writing three weeks after the grievance is acknowledged and the date of response to the complainant will be recorded in the grievance log.
6. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log,

7. The grievance will be closed out and the close out date will be recorded, if the complainant is satisfied with the action taken. If not, further assessment is needed and reevaluation of the grievance is required.
8. It is envisaged that the grievances will be resolved within one month after receipt. If this is not possible, the complainant will be informed about the progress on a regular basis.
9. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.

In addition to grievances, comments will be reviewed once a week to identify if they require a response. In case the comment requires a response, an appropriate response will be developed by the Project team in a month after the submission date of the comment. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

A flowchart for processing grievances is given below.

Flowchart for Processing Grievances



The contact details for submitting grievances are provided below:

ADN PPP Sağlık Yatırım A.Ş.

Refik Belendir Sok. No: 110/2 Yukarı Ayrancı - ANKARA

E-mail: info@rsy.com.tr

Telephone: 0 312 441 31 41

Fax: 0312 442 59 48

10.0 RESOURCES AND RESPONSIBILITIES

The implementation of this SEP will be conducted and monitored by ADN PPP A.Ş. ADN PPP A.Ş. is represented by the following contacts:

Korkut Ersözoğlu

Address: Portakal Çiçeği Sokak No: 33 Yukarı Ayrancı/Ankara

Phone: +90 312 441 31 41

korkut.ersozoglu@ronesans.com

11.0 REPORTING

All comments and grievances received will be recorded in a comment log and grievance log, respectively. SEP monitoring and evaluation reports will be disclosed to stakeholders periodically by ADN PPP A.Ş.

ANNEX A

Comment/Complaint Form

ADANA INTEGRATED HEALTH CAMPUS PROJECT- COMMENT/COMPLAINT FORM		
INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by ADN PPP A.Ş.)		
Full Name:		
Date:		
Contact Information: (Please provide necessary information based on how you wish to be contacted) By mail By phone By e-mail.....		
Indicate your purpose: ☐ Comment ☐ Complaint Recorded by: ☐ Person submitting comment/complaint ☐ Other (please specify who)	Signature confirming receipt of completed Comment/Complaint Form copy	
YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)		
INFORMATION ABOUT YOUR COMPLAINT		
Describe the Complaint (Continue on the back of the sheet if required)		
Date of Incident Regarding Complaint ☐ One time incident/grievance (Date) ☐ Happened more than once (how many times?) ☐ On-going (currently experiencing problem)		
What would you propose to resolve the problem? (Continue on the back of the sheet if required)		
This section will be filled by ADN PPP A.Ş.		
STATUS OF COMMENT		
Comment Logged (Y/N)	Date of submission:	Logged by:
Response Required (Y/N)	Date of response sent:	
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature:

ADN PPP Sağlık Yatırım A.Ş.
 Refik Belendir Sok. No: 110/2 Yukarı Ayrancı - ANKARA
 E-mail: info@rsy.com.tr
 Tel: 0 312 441 31 41
 Fax: 0312 442 59 48

ANNEX B

Complaint Action Form

(to be used by ADN PPP A.Ş.)

COMPLAINT ACTION FORM

Information about the complainant		
The reference number of the complaint (taken from the grievance		
Date of grievance submission		
Describe all the details relevant to the complaint		
Describe apparent cause of incident		
Immediate action required		
Identify preventative action (if required)		
<i>Continue on seperate sheets as required.</i>		
Desicion of the measures to be taken by HSE responsible	Name	Signature and date
Person responsible for corrective action	Name	Signature and date
Completion by	Name	Signature and date
Verification by	Name	Signature and date