



## **STAKEHOLDER ENGAGEMENT PLAN (SEP)**

# *Mersin Port Phase II Extension, Turkey*

FINAL

JULY 14, 2023

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## Abbreviations

AID	Areas of Direct Influence
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMH	East Med Hub
ESIA	Environmental and Social Impact Assessment
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
IFC	International Finance Corporation
MIP	Mersin International Port Management Inc.
MMM	Mersin Metropolitan Municipality
NGO	Non-Governmental Organization
PR	Performance Requirement
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SIP	Supplementary Information Package
TCDD	Turkish State Railways



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## 1.0 Introduction

This Stakeholder Engagement Plan (“SEP”) is prepared for Mersin International Port (“MIP”) for East Med Hub 2 (EMH2) (“Project”) construction and operation phases in line with European Bank for Reconstruction and Development’s (EBRD) and International Finance Corporation’s (IFC) Environmental and Social Policy, and more specifically EBRD Performance Requirement 10 (“PR10”) and IFC Performance Standard 1 (“PS1”). This SEP identifies target groups and defines the types of engagement activities for each group during the pre-construction, construction and operation phases.

This SEP will be reviewed by MIP at a minimum on an annual basis to meet the needs of local communities and other relevant stakeholders as listed in this SEP and to determine whether any changes or updates are required to SEP unless a more frequent update is required to reflect the Project phase activities, changing Project design, legislative and/or Environmental and Social Management System requirements. The operation phase SEP will be reviewed upon completion of the Project to include any additional requirements.

## 2.0 Project Description

The EBRD and the IFC are considering providing financing to MIP for the extension of existing terminal of Mersin International Port.

Mersin International Port (MIP) was established in the 1950s by Turkish State Railways (TCDD) and rented in 2007 for 36 years to MIP, a joint company initially established by Akfen Holding and PSA International. In 2017, the Australian Infrastructure Fund IFM joined as a shareholder. The land on which MIP is established is owned by TCDD and the Treasury. Having acquired the right to operate the port, MIP has made investments to improve its capacity to provide services in land and marine areas.

The current shareholder structure is as follows:

- 51% - PSA International
- 39% - IFM Investors
- 10% - Akfen Holding

In 2019, MIP decided to expand the port capacity with additional investment within the scope of Mersin Port Extension Project Phase II (EMH2), in order to use the docks inside the port more effectively, to increase port activities, and to service more large-volume ships from the port services of Mersin Port. Mersin International Cruise and Container Port is reported to have the potential to be the most important port to meet the demands of international logistics companies in the Eastern Mediterranean region. Mersin Port will increase its service capacity in the Eastern Mediterranean and will make a significant contribution to the increase in Turkey’s maritime trade.

Mersin International Port is regarded as one of the leading ports not only in Turkey but also in the Eastern Mediterranean, due to its geographical location, capacity, wide hinterland as well as the advantages provided by the convenience of multi-mode connection to domestic and international ports. Mersin Port has 21 docks over a total port area of 112 hectares. It can provide loading and unloading services to nearly 30 ships at the same time depending on their sizes.



**Figure Error! No text of specified style in document.-1: Project Location and Activities**

EMH2 involves activities grouped under four main headings<sup>1</sup>:

#### **I. Additional Fill Area:**

The additional fill area will be an extension of the existing berth and yard. It is an area of approximately 164,490 m<sup>2</sup>. It is planned to fill the front and west of the dock no. 1, in front of the docks no. 2 and no. 3, and the area in front of the previously filled area of 27,912 m<sup>2</sup>.

#### **II. New Cruise Port Fill Area**

Mersin Port will lose the ability to accommodate cruise ships due to the new additional filling area. For this reason, a new cruise port will be constructed by filling an area of 11,845 m<sup>2</sup> right next to the existing cruise port (80 m to the west). The total of this area with the filling area mentioned above is 176,335 m<sup>2</sup>. In other words, **a total area of 176,335 m<sup>2</sup> will be filled in the project.**

#### **III. Dredging Operations**

The purpose of the dredging is to deepen the harbor and access routes, which have filled in due to sedimentation and organic sediments in the sea, and to provide the depth required for large draft vessels. Within the scope of the project, a total of 3,297,000 m<sup>3</sup> dredging in a total area of 2,094,705 m<sup>2</sup>.

MIP has also launched Kapi Project (The Gate) in Mersin in parallel to EMH2. The Gate project is a multistakeholder project to resolve traffic impact of port operations. "Kapi Projesi - Gate Project" will be implemented concurrently with the extension project. With this project, the port traffic will be separated from the city traffic and the waiting times for the trucks will be shortened. For the project, MIP cooperates with other project stakeholders (Mersin Governorship, TCDD, General Directorate of Highways, State Hydraulic Works,

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<sup>1</sup> Non-technical Summary

Mersin Metropolitan Municipality, Akdeniz Municipality, Naval Forces Command, National Real Estate, Veterinary Medicine, Coast Guard, and other stakeholders).

### **Shortening of the main breakwater by 100 m**

The main breakwater was shortened by 100 m in 2020 so that ships can dock and maneuver easily. This component of the Project is not in the scope of the loan by EBRD and IFC, therefore, not assessed in the part of supplementary studies.

### **Project Location**

The EMH2 Project is located in the Akdeniz district of Mersin Province. Currently, there is an operating port in the Project Area.

Atatürk Park and Congress Hall, commercial areas and Mersin Marina are located to the west of the Project Area; there are other berthing areas related to Mersin Port in the east of the Project; Akdeniz District Center, residential areas, and state institutions in the north and the Mediterranean Sea in the south. In the east of the Project area, there is a free zone, a fuel terminal and a park. There is also a fishing port in the port and a military port nearby.

The Project schedule is given below.

- EMH2 Construction: 10.2023 – 02.2026 (approximately 28 months)
- Dredging Work: 10.2023 – 04.2024 (approximately 6 months)
- New Dining Hall Construction: 10.2023 – 10.2024 (approximately 12 months)

Detailed breakdown of the construction works will be defined by the contractors.

## **3.0 Requirements on Stakeholder Engagement**

All activities and implementations, within the scope of projects and operations of MIP shall comply with relevant standards. These are as follows;

- Commitments made to and requirements of, in accordance with relevant laws and regulations, relevant subsidiaries and institutions of Ministries of Turkish Republic
- International Standards (EBRD and IFC Environmental and Social Policy, and more specifically EBRD PR10 and IFC PS1, ISO 9001, ISO 14001, OHSAS 18001 and others); and
- All policies and standard operation procedures of MIP Management Systems.

### **3.1 Applicable National Law**

There are several laws and regulations in force that define terms and conditions to inform and consult public while conducting certain activities. The ones that would apply to the project are as follows;

#### **Constitution of the Republic of Turkey (Articles 25, 26, 74 and 148)**

Constitution of Republic of Turkey is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion (Art. 25). No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities (Art. 26). In addition, Turkish citizens and foreigners residing in Turkey, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public (Art. 74). Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights within the scope of the European Convention on Human Rights which are granted by the Constitution has been violated by public authorities provided that ordinary remedies are exhausted (Art. 148).

### **Law on the Right to Information (No. 4982)**

Law on the Right to Information regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

### **The Law on Use of the Right to Petition**

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

### **Regulation on Environmental Impact Assessment**

The requirement to perform a public information meeting at the beginning of the national EIA process in Turkey is defined by the Turkish Regulation on Environmental Impact Assessment ("EIA"). This Regulation was prepared in the context of the Article 10 of the Environmental Law. It aims to prevent the potential destructive environmental impacts of the projects and decrease or alleviate the existing environmental impacts of these projects.

Regulation on Environmental Impact Assessment requires Projects in Annex-1 of the Regulation to conduct a public consultation meeting. According to this Regulation, the primary objective of the public consultation meeting is to inform and consult the public on the Project. The regulation requires the meeting to be conducted in the Project site, accessible for the interested people; and the date and venue of the meeting need to be approved previously by the Governor and announced on a local and a national newspaper, at least 10 days prior to the meeting.

The Project's EIA meeting with the public was conducted on 12 July 2018 and positive decision was made on 17 April 2020.

## **3.2 International Requirements**

### **EBRD and IFC Requirements<sup>2</sup>**

According to the EBRD Environmental and Social Policy, 2019, and IFC process of environmental and social categorization, the Project is categorized as a Category 'A' project. This means that;

According to EBRD Policy: Project could result in potentially significant, adverse, future environmental and/or social impacts which cannot readily be identified or assessed and will require the Client to carry out a comprehensive Environmental and Social Impact Assessment (ESIA), including disclosure thereof.

According to IFC Policy: Business activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented.

The key requirements with respect to stakeholder engagement are laid out in the EBRD PR10, as described below, and IFC PS1.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD [Environmental and Social Policy](#) which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organizations about EBRD financed projects among Project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

For investment projects, IFC discloses a Summary of Investment Information (SII) and, if relevant, an Environmental and Social Review Summary (ESRS), depending on the E&S risk categorization. For all Category

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<sup>2</sup> <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

All investments, disclosure occurs 60 days prior to consideration by IFC's Board of Directors. For all other investments, disclosure occurs 30 days prior to Board discussion. IFC also has the Independent Accountability Mechanism (CAO) process. The new Policy for the Compliance Advisor Ombudsman (CAO), the independent accountability mechanism of the International Finance Corporation (IFC) and the Multilateral Investment Guarantee Agency (MIGA) was approved by the Boards of IFC ([https://www.ifc.org/wps/wcm/connect/corp\\_ext\\_content/ifc\\_external\\_corporate\\_site/cao-policy-consultation](https://www.ifc.org/wps/wcm/connect/corp_ext_content/ifc_external_corporate_site/cao-policy-consultation))

The EBRD's and IFC's requirements and standards concerning the stakeholder engagement process can be briefly summarized as follows:

- The EBRD's and IFC's policies view stakeholder engagement as central to building strong, constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts.
- Stakeholder engagement is an inclusive and on-going process which is most effective when initiated at an early stage of the project and is an integral part of the assessment, management and monitoring of environmental and social risks and impacts of the Project.
- Stakeholder engagement involves the following elements:
  - Stakeholder identification and analysis,
  - Stakeholder engagement planning,
  - Disclosure of information,
  - Meaningful consultation,
  - Implementation of a grievance mechanism, and
  - Ongoing reporting to relevant stakeholders.
- Stakeholder engagement should be conducted to provide stakeholders with access to timely, relevant, understandable and accessible information, in a meaningful, effective, inclusive and culturally appropriate manner and free from manipulation, interference, coercion, intimidation and retaliation.
- Stakeholder engagement will begin as early as possible in the project development and will continue throughout the project life cycle. The nature and frequency of stakeholder engagement at all phases of the project development will be proportionate to the nature and scale of the project, its potential adverse environmental or social risks and impacts and the level of stakeholder interest.
- The Project should identify and document the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties), or (ii) may have an interest in the project (other interested parties).
- The Project should define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.
- A mandatory requirement is the establishment of an effective grievance mechanism to facilitate prevention and/or timely resolution of conflicts that may arise.

Considering the social impacts of the Project, Project needs to establish in-depth consultation process which transparent engagement means and effective grievance mechanism.

Project will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.

Effective consultation is a two-way process that should: (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise; (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities; (iii) focus inclusive engagement on those directly affected as opposed to those not directly affected; (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and (vi) be documented. The Project will tailor its consultation

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process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement.

### 3.3 MIP Environmental and Social Management System (“ESMS”)

This SEP is a part of set of Management Plans developed for the Project and interrelates with Environmental and Social Policy of the Project to be developed.

The MIP has ISO 14001 – Environmental Management System, ISO 45001 – Occupational Health and Safety Management System and ISO 9001 – Quality Management Systems standards, policies and procedures. In addition, there are environmental and social management system documentation of PSA to be implemented by MIP. A risk assessment matrix of PSA is used in the port.

### 3.4 Project’s Social Management Plan (“SMP”)

A social impact assessment has been conducted and as a result of this assessment, a Social Management Plan has been prepared including Livelihood Restoration Plan.

## 4.0 Objective and Application of SEP

This SEP applies to the entire Project including construction and operation phases. SEP as a living document will be revised and updated during project life to incorporate additional phases of the Project as the engagement plan is easily adaptable.

Objective of SEP is to identify all stakeholders and their potential interest in the Project and define principles to be applied during engagement with the stakeholders of the Project.

This SEP is prepared for EMH2 project phases (pre-construction, construction). During operation phase this SEP and EMH1 operation SEP will be consolidated.

This plan ultimately aims to:

- Identify all stakeholders (directly, indirectly impacted and other interested parties), degree of Projects impacts they will experience and their potential interest in the Project
- Describe the effective engagement methods and activities by defining their purpose and frequency
- Provide means for effective and inclusive engagement with project affected parties to that will inform project design and implementation
- Define roles and responsibilities for the implementation of this Plan
- Describe the effective engagement methods
- Establish long term relations between MIP and local communities on the basis of mutual trust and transparency
- Make sure that stakeholders have access to relevant information on the Project
- Define a grievance mechanism for the Project
- Define monitoring and reporting requirements for the effective implementation of the SEP.

### 4.1 MIP’s Communication Strategy for 2023

- MIP has behaved in a way that respects the law, is prudent, and pays attention to the opinions of the public throughout the lawsuit process. From this point on, our corporate understanding won't deviate from this understanding.
- As MIP, we carried out projects that would contribute to the society in the recent years. We supported many NGOs with our sponsorships. So, for 2023, our strategy will be to get the returns of the support we provided in previous years.

#### 2023 Priorities

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- Engaging with the key stakeholders. Encouraging 3<sup>rd</sup> parties for proactive endorsement/advocacy of MIP.
- Engaging with local communities. Emphasizing MIP's contribution to society, the environment.
- Proactive positioning of MIP as a value generator. Telling MIP's narrative to the people of Mersin. Value creation through operations of MIP.

## 5.0 Stakeholder Identification and Analysis

Stakeholders of the Project are classified into internal (working at the Project or for its key contractors, directly involved in and benefitting from the Project) and external (not working at the Project and not involved in the Project).

External stakeholders are classified into: The community members (such as the inhabitants of project impact area) and other stakeholders (governmental and non-governmental organizations, employees and communities not affected/partially affected by the Project).

The categories of stakeholders are presented below.

### 5.1 Communities (Area of Direct Influence)

The Project will be constructed in the Mersin Province inside the municipal boundaries of Akdeniz District.

Neighborhoods around the area where the Project will be directly affected by possible visual (during construction and operation), noise (mainly construction), livelihood and traffic impacts (during construction and operation) of the Project according to SIA are presented below and presented in Figure 2.

Directly Impacted Project Neighboring Land Users by Traffic, Livelihood, Noise and Visual Impacts:

- Atatürk Park users from across Mersin
- Street vendors and café owners in Atatürk Park
- Tour Boat operators, fishers, fishers' boat restaurants operating in the port area
- Agency boats operating in the port area

Neighborhoods potentially impacted by Traffic:

- Üçocuk Neighborhood
- Yeni Neighborhood
- Cami Şerif Neighborhood
- Çankaya Neighborhood
- Kültür Neighborhood
- Hamidiye Neighborhood
- Hal Neighborhood



Figure 2: 7 neighborhoods in the Akdeniz district of Mersin

## 5.2 Other Stakeholders (Area of Indirect Influence)

Other stakeholders are represented below.

### a. State agencies and relevant authorities

#### i. Local State agencies and relevant authorities

- Mersin Governorship
- Akdeniz Governorship
- Mersin Metropolitan Municipality
- Akdeniz Municipality
- Mersin Provincial Directorate of Environment and Urbanization
- Mersin Provincial Directorate of Agriculture and Forestry
- Mersin Provincial Directorate of Culture and Tourism
- Mukhtars

#### b. Non-governmental Organizations, Non-civil Organizations and Individuals

- Mersin Chamber of Commerce and Industry
- Mersin Chamber of Shipping
- Chamber of Merchants and Craftsmen
- Chamber of Environmental Engineers
- Coordination Council of Union of Chambers of Turkish Engineers and Architects
- Mersin Bar Association
- Businessmen Associations (MESIAD, MUSIAD and other relevant professional associations)
- Refugees Associations (such as The Association for Solidarity with Asylum Seekers and Migrants – Mersin Branch)
- Disabled Associations (such as Turkey Disabled Association - Mersin Branch)
- Women Associations (such as Mimoza Women Association)
- Environment Associations (such as Mersin Environment and Nature Association)
- Mersin City Council
- Academics / Intellectuals (Members of Mersin University and METU Erdemli Marine Science Institute)

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**c. Media and Press**

National and local media and press (print, audio-visual and internet media)

**d. Employees**

- MIP workers
- Contractor and sub-contractor workers

**e. Local Business**

- Logistic Companies
- Tourism Agencies

**f. Worker Unions**

- Port Workers' Union

Other unions will/may be identified during the construction.

**g. Vulnerable People**

Project is not expected to trigger Project induced vulnerabilities. However, there may be vulnerable people amongst boats' employees, low-income groups, young, elderly, disabled and migrants. Project will not aggravate their vulnerability. The Project will not induce livelihood impact. Therefore, there are no livelihood provisions targeted.

From a gender perspective, there are two female employees on agency boats but their office is located outside the port, so they will not be impacted by the Project. There are also 2 female Employees on tour boats. As no changes to tour boat routes are envisioned, there will not be adverse impacts on livelihoods of women employees of tour boats.

On 12 June 2020, the Mersin Metropolitan Municipality filed a lawsuit (along with the Stay of Execution Demand for the transaction subject to the lawsuit) against the Ministry of Environment and Urbanization (the for the Cancellation of the Transaction and Execution of the 1/5000 scale Additional Revision Master Plan as well as 1/1000 Scale Additional and Revisional Implementation Plan which were prepared for the capacity increase of Mersin Port and approved by the Ministry. The details of this legal process are given in Social Impact Assessment of the Project.

## 6.0 Stakeholder Engagement to Date

Previous stakeholder engagement activities conducted by MIP for the EMH2 are given below.

### 6.1 EIA Permitting Phase Engagements

The details of the engagement activities conducted during the EIA permitting phase can be found in the table below.

**Table 1: Stakeholder Engagement up to date**

Engagement activity	Method of disclosure and information dissemination	Location	Date	Key issues discussed and key concerns raised
Mediterranean Economic Forum	Media	Mersin	2018	EMH II project was informed to the participants during MIP GM's speech
Environmental Impact Assessment**	Newspaper, website of the MoEU, public notice was hanged on the information	Mersin Congress and Exhibition Center	2018	EMH II project and its environmental impacts

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Engagement activity	Method of disclosure and information dissemination	Location	Date	Key issues discussed and key concerns raised
	board in Municipalities and Mukhtars			
Meeting with Mersin MM Mayor	Social media accounts, MIP Panorama Magazine, local & international media	MIP	2019	Projects of MIP, alternatives on how to support the city more as MIP, general city problems, possible mutual corporation opportunities for city and city people
Meeting with Mersin Chamber of Commerce & Industry (MTSO)	Social media accounts, MIP Panorama Magazine, local media	Mersin	2019	Chamber was informed about the company projects including EMH II project in detailed
Presidency of the Republic of Turkey Investment Office visit	Social media accounts, MIP Panorama Magazine, local & international media	MIP	2019	President of the Investment Office was informed about the company projects including EMH II project in detailed.
Singapore Ambassador visit	Social media accounts, MIP Panorama Magazine, local & international media	MIP	2019	Ambassador was informed about the company and EMH II project

\*\*The Project's EIA meeting with the public was conducted on **12 July 2018** and positive decision for the EIA report was made on **17 April 2020**. Total of 17 people including mukhtars, local government representatives, and local people attended this meeting.

- One of the questions asked was whether gypsum waste from manure could be used in the filling area. It has been stated that work with the Ministry of Environment and Urbanization (MoEU) on this issue was continuing.
- Information was asked about the method of disposal of wastes from ships. It was stated that the wastes from the ships were taken to the waste receiving facility in the port and then the wastes were sealed and sent to licensed companies for disposal.
- It was asked whether there was enough area in the dump area for the wastes from the bottom dredging and also why the port needed to be enlarged. It was stated that studies were carried out regarding the dumping areas and the area was sufficient. It was also stated that the port was planned to be expanded in order to increase its commercial volume.

## 6.2 Engagements during SIA Preparation and Supplementary Studies

In addition to the stakeholder engagement presented in table above, many stakeholder interviews have been conducted within the scope of Social Impact Assessment and MIP representatives also attended these interviews between March 2021 and April 2021.

**Table 2: Stakeholder Interviewed for Social Impact Assessment**

No	Name of Stakeholder	Category
1	Mersin Metropolitan Municipality	Municipality
2	Akdeniz Municipality	Municipality
3	Governorship	Public
4	Provincial Directorate of Environment and Urbanization	Public

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No	Name of Stakeholder	Category
5	Provincial Directorate of Culture and Tourism and Tourism Agencies	Public
6	Çukurova Development Agency	Public
7	Port Authority	Public
8	The Cruise Port Management	Public
9	Logistic Companies (2)	Business
10	Security Authorities	Public
11	Çamlıbel Fishing Port	Business
12	Businesses in Atatürk Park including tour boats, street vendors etc.	Business
13	Users of Atatürk Park	Public
14	Mersin Regional Directorate for Traffic	Public
15	Local Media and NGO Representatives	Media – NGO
16	Mukhtars (3)	Mukhtarship
17	Residents in affected area	Public
18	Academics/Intellectuals/Think-Thanks	NGO
19	Coordination Council of Union of Chambers of Turkish engineers and architects	NGO
20	Mersin Chamber of Industry and Commerce	NGO
21	Chamber of Shipping	NGO
22	Turkish Exporters Assembly	NGO
23	Chamber of Merchants and Craftsmen	NGO
24	Representatives of the Mersin Environment Platform	NGO
25	Mersin Bar Association	NGO
26	Workers/Internal Stakeholder at MIP	Business
27	Provincial Directorate of Agriculture	Public
28	Turkish Radio Television Institution (TRT)	Public

During the preparation of the SIA study, a grievance tool was integrated into the MIP website. (See <https://www.mersinport.com.tr/tr/hakimizda/detay/mersin-limani-genisleme-projesi-emh-2/589/2329/0>)

### 6.2.1 Stakeholder Engagement and Disclosure Activities Between 2021-May 2023

MIP conducted 40 meetings with 33 stakeholders between February 2021 - January 2022; including Mersin Governor, 2 experts from Mersin Metropolitan Municipality, Mayor and Deputy Mayor of Akdeniz Municipality and Mayor of Mezitli Municipality, 4 public institutions, 10 NGOs, 4 embassy, 2 political parties, 5 business enterprises, 1 journalist from press, 2 sports club and 2 courtesy visits to Mersin Metropolitan Municipality Press and Public Relations Department and Ankara CHP. MIP also held 9 stakeholder engagement activities. Disclosure brochures on EMH 2 Project were distributed 4 mukhtars of Üç Ocak, Cami Şerif, Kültür and Yenimahalle Neighbourhoods on September 9th, 2021.

In 2022, MIP communicated with 62 external stakeholders and took part in a total of 24 events. Activities included organizing music festivals, street festivals, beach clean-ups, attending award nights, visits to mukhtars' offices, and information activities about project activities.

Activities were carried out with 11 different business enterprises, 10 different embassies, 5 public institutions (Governorship, Port Authority, etc.), 8 NGOs (Lisev, Kızılay, Turmepa, etc.), 1 NGO/Association (Mersin Chamber of Commerce and Industry), 7 universities (Mersin, Atılım, Çağ, Tarsus, Niğde, Gaziantep). Activities were carried out 5 times with district municipalities (Akdeniz and Mezitli), 2 times with tour boat owners, 2 times with international organizations (UN, EBRD, IFC), 1 time with metropolitan municipality (Adana), 9 times with NGO/Associations (MUSIAD, ÇUGIDER, TURKONFED, TUSIAD, etc.). Details are given in Appendix 4.

By the end of May 2023, 24 external stakeholders were communicated with and a total of 6 events were organized. The events included the promotion of The Gate Project, support for earthquake relief ships, etc.

Meetings were held with 3 business enterprises, 1 district municipality (Mezitli), 1 embassy (Egypt), 1 impacted community group (boat owners), 2 ministers (Energy and Foreign Affairs), mukhtars (Camişerif, Kültür and 3 Ocak), 5 NGO/Association (MUSIAD, TUSIAD, etc), 5 NGO/Chamber (MTSO members), 1 political party, 1 public institution (governorship) and 1 university (Mersin). Details are given in Appendix 4.

The tables containing the details of these meetings can be found in Appendix 4.

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## 6.2.2 CORPORATE SOCIAL RESPONSIBILITY ACTIVITIES IN 2023

### MIP Sponsorships

MIP had continued to support local communities in 2023. The first big CSR projects that will be initiated in the first half of 2023 are:

- **School sponsorship** (24-classroom capacity w/ 720 students)
- **Aziz Sancar Sports Complex sponsorship**

Communication activities (press release, social media posts) can be created around these projects throughout the year.

### MIP's Earthquake Response

During the Turkey Kahramanmaraş earthquake, MIP proactively engaged in corporate social responsibility initiatives, offering support and aid to the affected communities. Below are some of the significant contributions during this challenging time:

- In the first days of the earthquake, Mersin Metropolitan Municipality and other district municipalities worked with great devotion. During this period, MIP met with Deputy Mayor Gülcan Kış and committed to provide all the necessary support.
- 3000 blankets, 2000 towels, 16.000 clothes, 14.500 hygiene products were delivered to Mezitli Municipality for earthquake survivors.
- Yenişehir Municipality requested 11 \* 20 DC and 1 \* 40 DC containers for the neighborhood cultural park, which they plan to establish for the sociocultural rehabilitation of the earthquake victims who came to our city after the Kahramanmaraş earthquake and as a gathering and emergency need point in future disasters.
- 1500 food aid boxes was delivered to Akdeniz Municipality to be distributed during Ramadan.
- Material aid sent to the survivors:
  - Over 27,000 canned and packaged food boxes
  - 153 tents, 3 living and office containers
  - Over 800,000 bottles of water
  - Over 3,500 blankets
  - Over 38,420 pieces of clothing
  - Over 34,088 hygiene products
- MIP collaborated with the **Mersin International Music Festival** to organize a charity concert to support the earthquake victims with the proceeds. Some of the kids was **earthquake survivors** came from the earthquake region. Concert income were given to 32 earthquake survivor students.

### Food Support in Ramadan

MIP has donated 560K TL shopping cards to the city people in Akdeniz district. Those who are in need had been specified by the mukhtars of each neighbourhood: Yeni Mahalle, Camişerif, 3 Ocak, Kültür and Akdeniz Municipality.

## 6.3 Stakeholder Engagement during LRP Preparation

### 7.3.1. Scoping

The scoping field work took place on December 21-22, 2021. The aim of the scoping field work was:

- to visit the port area to assess baseline conditions
- to discuss the impacts of the previous expansion projects on livelihoods
- to understand Project potential impacts on Project Affected Persons (PAPs) livelihoods,
- to discuss potential Project livelihood impacts with key stakeholders
- to identify potential PAPs.

A kick off meeting was held with MIP Project Director and Project Manager. In line with the TOR, consultations with stakeholders were kept at “high level” (relatively general) during this scoping phase. All stakeholders contacted for scoping meetings agreed to meet and discuss the Project. Upon consultations with stakeholders, a close out meeting was held with the Project Director and Project Manager.

Below is the list of stakeholders consulted during scoping visit:

**Table 3. Stakeholders Consulted during the Scoping**

Stakeholder	Title	Meeting Attended by
<b>Provincial Directorate of Agriculture</b>	Fishing and Marine Products Deputy Director	SRM
<b>Çamlıbel Amateur Fishermen’s Associations</b>	President and co-chairs	SRM and MIP
<b>Mersin Provincial Directorate of Environment and Urbanization</b>	Director	SRM and MIP
<b>Mersin Port Authority</b>	Director	SRM and MIP
<b>Mersin Provincial Tourism and Culture Directorate</b>	Director and vice-Director	SRM
<b>Akdeniz Municipality</b>	Vice-mayor	SRM and MIP
<b>Mersin Chamber of Maritime Commerce</b>	Board members	SRM
<b>Mersin Hotel</b>	Manager	SRM

### 7.3.3 Impact Identification Field Work

The field work was carried out between February 1-4, 2022 by 4 consultants from SRM Consulting. The field work started with a face-to face meeting with MIP team; and upon completion of field studies, an online closing meeting was conducted to reflect the field findings. The field work focused on consultations with identified PAPs, businesses and one-on-one meetings with key stakeholders.

During the field study, all stakeholder groups targeted for impact assessment were consulted. Within the scope of the study, 41 PAPs from 27 different institutional stakeholders were interviewed. 16 of these stakeholders are directly affected by the Project and their livelihoods are likely to be affected.

Interviews were held with mukhtars of Kültür and Çankaya Neighborhood where Atatürk Park is located, the Metropolitan Municipality, Akdeniz Municipality, public institutions, and NGOs including Union of Chambers of Turkish Engineers and Architects, Chamber of City Planners that oppose the Project. The list of interviewed stakeholders is shown in the table below.

**Table 4. Stakeholders Consulted during the LRP Field Work**

Institution No	Person No	Institution	Title	Stakeholder Type
1	1	MIP	Project Director	MIP Project owner
1	2	MIP	Corporate Communications Manager	MIP Project owner
2	3	Akdeniz Municipality	Deputy Mayor	Municipality
3	7	Mersin Metropolitan Municipality	Head of Department of Financial Affairs	Metropolitan Municipality
3	4	Mersin Metropolitan Municipality	Atatürk Park Maintenance and Repair Specialist	Metropolitan Municipality

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Institution No	Person No	Institution	Title	Stakeholder Type
3	6	Mersin Metropolitan Municipality	Assistant Secretary General	Metropolitan Municipality
3	5	Mersin Metropolitan Municipality	Assistant Secretary General	Metropolitan Municipality
4	8	Mersin Port Authority	Port Director	Public Institution
5	9	Mersin Provincial Directorate of Environment, Urbanization and Climate Change, Department of National Estate	Director of Akdeniz Real Estate Directorate	Public Institution
6	10	Akdeniz Region Coast Guard Command	Commander	Public Institution
7	11	Mersin Culture and Tourism Provincial Directorate	Director	Public Institution
8	12	Mersin Governorship	Governor	Public Institution
9	13	Customs Directorate	Boat Personnel	Public Institution
10	15	Mersin Provincial Agriculture and Forestry Directorate	Deputy Director	Public Institution
10	14	Mersin Provincial Agriculture and Forestry Directorate	Director	Public Institution
10	16	Mersin Veterinary Border Control Directorate	Director	Public Institution
11	17	TRT Çukurova Directorate	Director	Public Institution
12	18	Kültür Neighborhood Mukhtar	Mukhtar	Mukhtar
13	19	Çankaya Neighborhood Mukhtar	Mukhtar	Mukhtar
14	20	Çamlıbel Solidarity Association	President	NGO – Association
14	21	Çamlıbel Solidarity Association	Member	NGO – Association
15	22	Union of Chambers of Turkish Engineers and Architects, Chamber of City Planners	Provincial Representative	NGO – Chamber
16	23	Mersin Chamber of Shipping	President	NGO – Chamber
16	24	Mersin Chamber of Shipping	Secretary General	NGO – Chamber
17	25	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative President and Company Director	Business – Agency boat
17	28	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
17	27	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
17	31	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
17	26	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat

**Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information**

Institution No	Person No	Institution	Title	Stakeholder Type
17	30	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
17	29	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
18	32	Park Café	Business Owner	Business – Park
19	33	Mobile Vendor	Mobile Vendor	Business – Mobile Vendor
20	34	Mobile Vendor	Mobile Vendor	Business – Mobile Vendor
21	35	Mobile Vendor	Mobile Vendor	Business – Mobile Vendor
22	36	Mobile Vendor	Mobile Vendor	Business – Mobile Vendor
23	37	Captain Adnan VIP Tour Boats	Tour boat owner	Business – Tour boat
24	38	Troys Tour Boat	Tour boat owner	Business – Tour boat
25	39	Baba Ahmad Tour Boat	Tour boat owner	Business – Tour boat
26	40	Seyhan 2 Tour Boat	Tour boat owner	Business – Tour boat
27	41	Tour Boat Captain	Captain	Business – Tour boat

In addition, MIP prepared a Project Presentation (<https://www.mersinport.com.tr/tr/hakimizda/detay/mersin-limani-genisleme-projesi-emh-2/589/2329/0>) and shared it on its website, and also prepared a video about the Project and shared it on YouTube (<https://youtu.be/9XpuykbFHNU>).

#### 7.3.4. Stakeholder Feedback during the LRP Consultations

During the LRP field consultations, all consulted stakeholders except for the Mersin Metropolitan Municipality (MMM) and Mersin Chamber of City Planners (CCP) had positive view of the Project. As MMM and CCP have a court case against the Project, they have voiced their overall concern regarding the Project. Due to the court case, there has been no official engagement between MIP and these stakeholders.

Main feedbacks received from PAPs and stakeholders during the LRP field work are as follows.

- i. Tour boats: Interviews were held with 4 out of 6 tour boats which work in Ataturk Park. Interviewees are both the owner and the employees of tour boats. According to tour boat operators, they have a limited relationship with MIP.<sup>3</sup> Only one tour operator was contacted and informed by MIP about the Project (MIP stated that he was visited two times on 11<sup>th</sup> September 2021 and 23<sup>rd</sup> December 2021). They have no information or have misinformation about the details of the Project (construction area, project schedule etc.), grievance mechanism, responsible parties, contact numbers etc.
- ii. Agency boats: Agency boats which operate in the port are managed as a company and a cooperative on behalf of the owners of these boats. The Cooperative has seven members, each representing a company. According to the meeting with the Cooperative members, there were two separate meetings held by MIP with agency boat operators. 6 months ago, MIP conducted an interview with them and informed them about the Project. Agency boats were informed about the Project once again at a meeting held two months ago by MIP Naval Operations Manager. Thus, they have detailed information about the Project but they stated they need an answer about their relocation during the Project construction period. Upon this request, MIP held a meeting with agency boat representatives on 3rd March 2022 as also taking a corrective action

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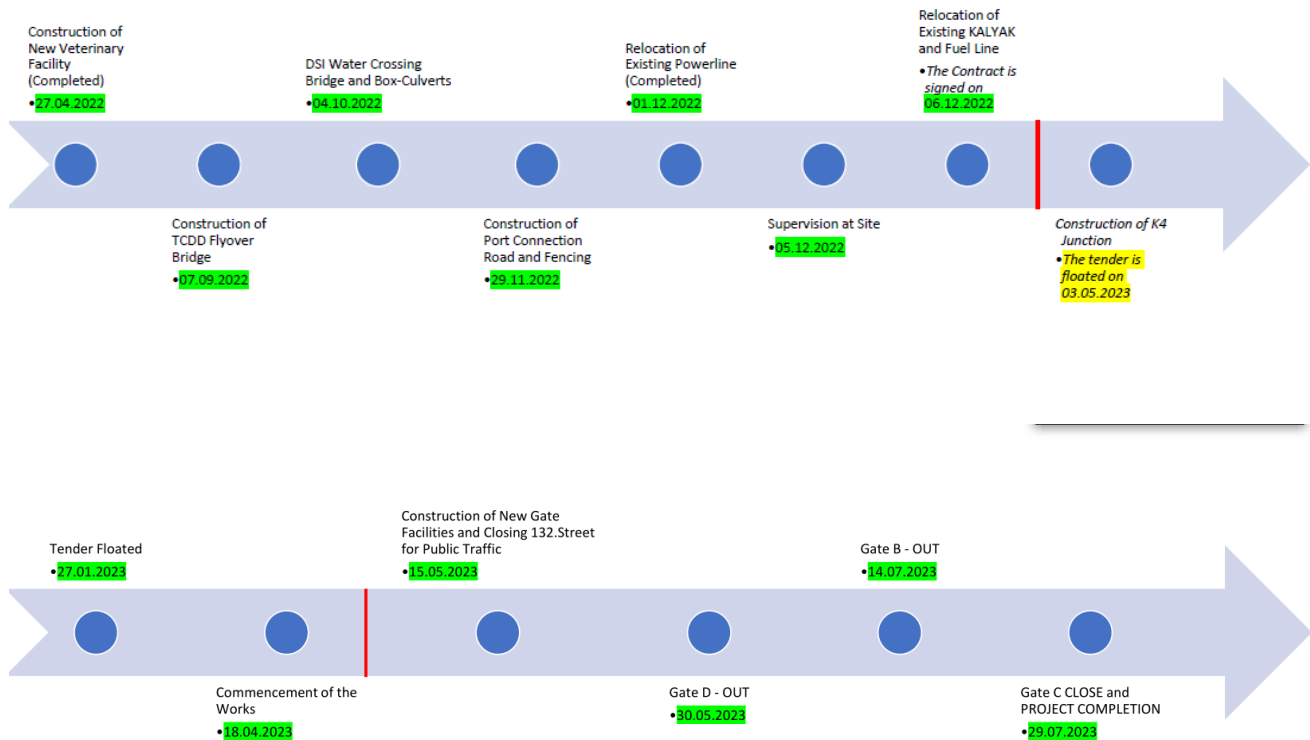
<sup>3</sup> MIP stated that they have not received such feedback from tour boat owners before.

specified in LRP report. Participants of the meeting agreed that MIP will provide location for agency boats in the western side of the to-be-build EMH2 berth. According to the meeting minutes signed by both sides, the advantage of this locations that it allows closer proximity to the port entrance and vessels. Also, it was decided that the Association will file an official a request to the Customs and Harbor Master to complete the official process for this new location.

- iii. Mobile vendors and café owner in Ataturk Park: There are 19 mobile vendors in Ataturk Park. Four mobile vendors that are located closest to MIP and the owner of the only café in Ataturk Park were interviewed during the field visit. It was observed that mobile vendors were not informed or contacted by MIP about the Project. Three of four vendors have misinformation that there will be construction works in Ataturk Park.

## 6.4 The Gate Project

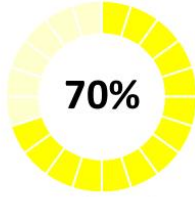
The Gate Project was started on 27.04.2022. The construction process is ongoing. Target completion date for the Gate C close is 29.07.2023. Total Project including Highway connection through K-4 Roundabout is to be established in 2024.



## Progress



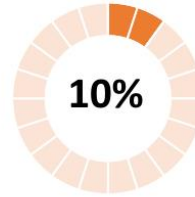
New Veterinary Building



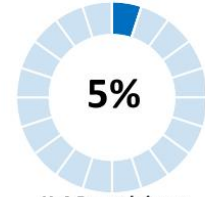
TCDD Flyover & Water Crossings



New Connection Road & Fencing



New Gate Facilities



K-4 Roundabout Highway Connection



In 2022, a total of 2 meetings were held with the following institutions in relation to the project. These meetings were carried out as field and office visits.

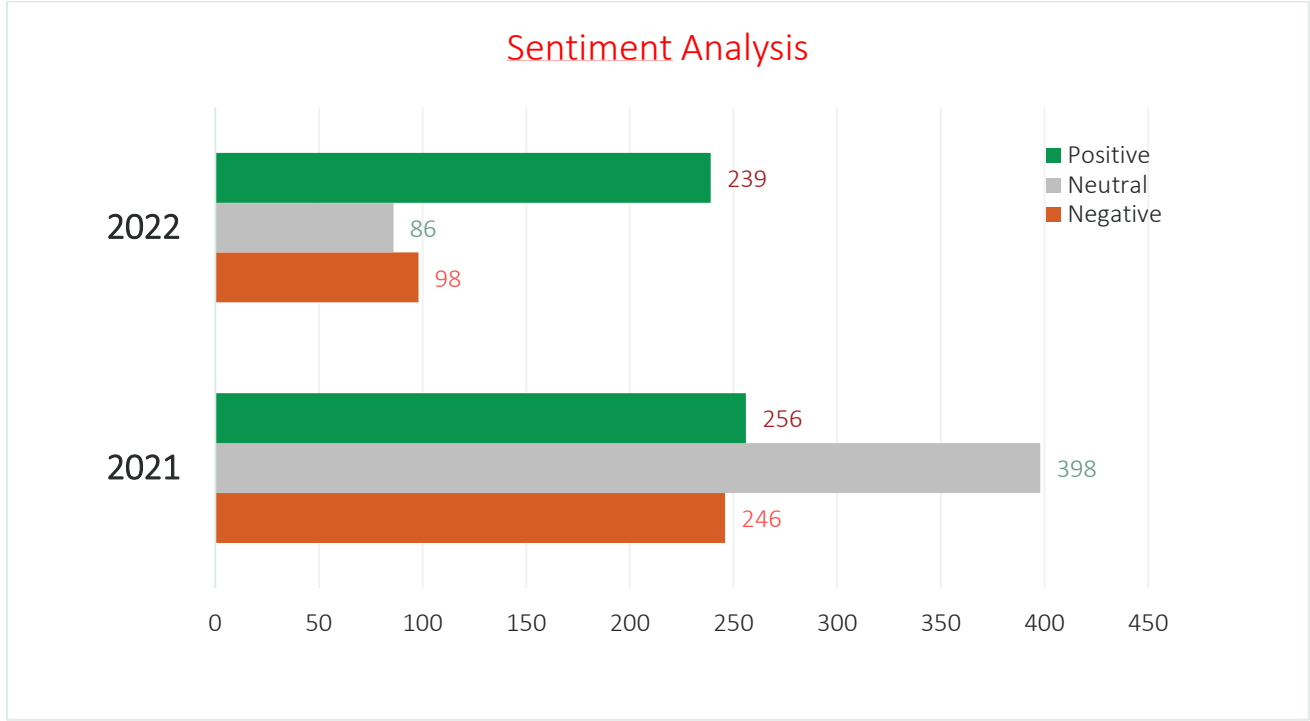
- Embassy of Belgium
- MUSIAD

In 2023, a total of 5 meetings were held with the following institutions in relation to the project. These meetings were carried out as field and office visits.

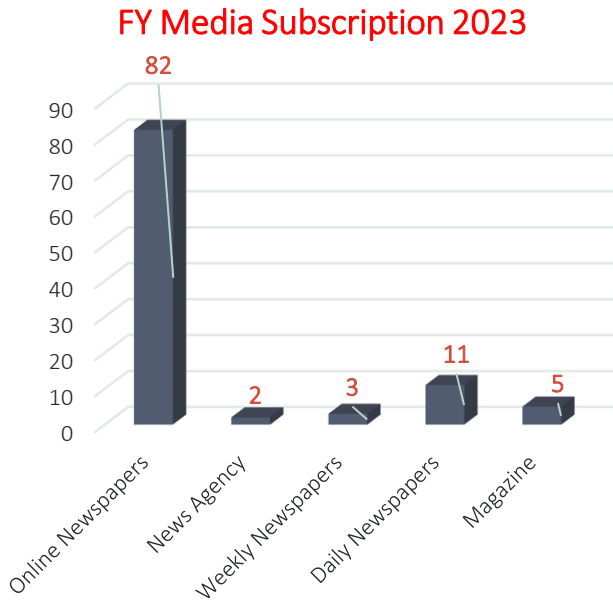
- Mersin Municipality
- Mersin Municipality Transportation Planning Dept.
- Mersin Municipality Transportation Coordination Committee
- Traffic Supervision Bureau

### 6.5 Media Analysis Summary

There is a 60.2% decrease in negative captions about MIP in 2022 compared to the previous year. In 2022, there has been a decline in news headlines about MIP. It may seem that there is no increase in positive news compared to previous years, but it has a significant impact compared to other sentiment news in 2022.



4



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<sup>4</sup> Positive represents the direct news items were mentioned positive about MIP. Neutral represents the direct negative news items which includes MIP in a neutral approach. Negative represents the direct news items were mentioned negative about MIP.

## 7.0 Stakeholder Engagement Methods and Programme

### 7.1 Stakeholder Identification and Engagement Methods

The identified stakeholders with potential interest and concerns in relation to the Project are summarized below. MIP will employ various stakeholder engagement vehicles and methodologies for an effective stakeholder engagement. Key methods and tools which will be primarily used to engage with different stakeholder groups are also shown in the following table.

**Table 5: The identified stakeholders with potential interest area and engagement methods**

Stakeholder group	Interest Area	Engagement and information disclosure methods
Local communities, Community Members	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments.	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, information kiosks in Atatürk Park
Businesses in the Atatürk Park (tour boats, café owners)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts of the project, livelihood impacts	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, in-depth consultation, face to face interviews, and information kiosks in Atatürk Park
Agency boats operating in the port area	General Project Information, Schedule (especially construction period), Economic Impact	Dialogue and disclosure meetings, face-to-face interview, in-depth consultation
Fish Restaurants at Çamlıbel Fishery	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts of the project, livelihood impacts.	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, in-depth consultation, face to face interview
Fishermen (Amateur and Commercials)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, livelihood impacts, restriction zones that may be imposed during construction and operation	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, regular meetings, in-depth consultation, face to face interview
Project workforce/ Contractors/Worker Unions	Working conditions	Face to face interview, Trainings, Employee Grievance Mechanism
Local/ Regional Authorities (Governors, Mayors, Mukhtars, Provincial Directors)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments, any impacts on Atatürk Park, traffic impacts.	Official meetings, Dialogue and engagement meetings, worksite visits

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Stakeholder group	Interest Area	Engagement and information disclosure methods
Business Sector representatives in Mersin (i.e., Logistics)	Collaboration potentials, economic impacts of the Project, schedule, capacity increase	Thematic / sectoral roundtable meetings
NGOs and academics/experts	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments.	Dialogue and engagement meetings, Regular reports through website, Posters/Leaflets/Drone footages published on the website, Media & Press statements, Grievance Mechanism on the website
Business and Industry Chambers, Unions & Associations	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments.	Close one to one engagement, Thematic / sectoral roundtable meetings
Opposition Platform	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, livelihood impacts, restriction zones that may be imposed during construction and operation, visual impacts, impacts on the use of Atatürk Park and Congress Hall.	Official meetings, in-depth consultation, Face to face interview
Atatürk Park users Congress Hall users	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts, noise impacts, impacts on the use of Atatürk Park	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, in-depth consultation, face to face interview, the recording of visitor baselines and monitoring activities
Media and Press	Interviews, press releases, web site	Interviews, press releases, web site
Vulnerable Groups (women, children, disabled persons, minorities and migrants using Atatürk Park)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts, noise impacts, impacts on the use of Atatürk Park.	Dialogue and engagement meetings with the organizations owned by vulnerable groups, advocate and protective organizations, mukhtars in Mersin.

### Information Disclosure Methods

#### Internet/Web Site

MIP will keep updated project information regularly on the Project website. Grievance mechanism will also be disclosed on the web site with grievance form, description of grievance mechanism and timely feedback will be ensured.

#### Public Media

Project information will be supplied to public media through appropriate means such as interviews, press releases and website/social media updates. These activities will be coordinated with Communication Department at the MIP.

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### Publications for people

MIP will give full and timely responses to comments, complaints and questions of local communities and civil society organizations following grievance management procedure. The comments, complaints and questions will be logged, processed / distributed to relevant departments, and response/feedback will be sent back to the applicant timely. For less digitally savvy community members a call center or written application via information desks/ kiosks will be enabled.

MIP will generally make the necessary information shares through the materials such as booklets, leaflets, posters, and similar materials providing information about different stages of the Project.

## 7.2 Information Disclosure

Reliable and complete Project information will be presented to stakeholders in a manner that takes account of specific local conditions, cultural and language preferences of local communities.

To effectively communicate relevant information to different stakeholder groups, the following documents will be disclosed at the MIP website and in the MIP Office in paper copy:

- Non-technical summary (in Turkish and English)
- This Stakeholder Engagement Plan (in Turkish and English)
- Livelihood Restoration Plan
- Project Local Environmental Impact Assessment
- Supplementary Information Package (including Construction Environmental and Social Management Plan, Social Impact Assessment)
- Environmental and Social Action Plan
- Posters, Booklets, Leaflet and similar materials (in Turkish and English)

The international community will be also able to have access to the English versions of these documents at the Company website.

## 7.3 Gender

Gender equality will be considered in the implementation of the SEP, which has a participatory and inclusive approach. MIP will take the following measures in line with gender equality principle:

- Disaggregating all data obtained and recorded during the Project lifecycle based on gender
- Gender impact monitoring during the Project construction and operation periods (local employment, local businesses -woman café owner in the Ataturk Park, mobile vendors etc.)
- Internal grievance mechanism accessible and confidential for female employees of MIP and its contractors in the Project to prevent gender-based violence and harassment
- Keeping internal and external grievance records by gender
- Analyzing and monitoring the effectiveness of stakeholder engagement methods in terms of the participation of women stakeholders

## 7.4 Stakeholder Analysis and Engagement Programme

The stakeholder analysis presented in this Plan is based on publicly available information sources. The information on stakeholders should be amended and updated as the Plan progresses.

The key stakeholders identified as a result of the analysis are listed below together with a summary analysis of their potential interest on the Project. Mersin has a vibrant civil society life. It is important to engage with the components of the Mersin City Council and Environment and Women's Platforms and branches of national civil society organization and to make calls without making a distinction and to mobilize voluntary participation. As emphasized in SIA study, polarization in the social and political sphere is a key factor in social conflicts and tension around the debates for EMH 2 project. On the other hand, it is a great advantage that the culture of democracy in Mersin is well-rooted with many diverse actors and cultures.

Stakeholder engagement is an ongoing activity throughout construction and operations. The following programme summarizes key planned stakeholder engagement during the construction and operation phases

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and will be reviewed periodically during construction, and annually during operations, to ensure that it remains valid and meets the needs of MIP, communities and other relevant stakeholders as identified in this SEP.

In accordance with the pandemic constraints, the methods given below can be shaped and changed according to the circumstances. For example, certain meetings can be carried out online. MIP is in line with IFC interim covid 19 guideline

([https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_tipsheet\\_covid-19\\_supportingworkers](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_tipsheet_covid-19_supportingworkers))

**Table 6: External Stakeholder Engagement during Pre-construction<sup>5</sup>, Construction, Operation Phases of the Project<sup>6</sup>**

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
All stakeholders	Project Information on design, schedule, environmental and social impacts of the project construction, commissioning and operation, recruitment and procurement strategies of Project Grievance Mechanism Management of environmental and social risks of the Project Strategic Communication Plan Local Hiring Plan Community Investment Plan Livelihood Restoration Plan	<b>Pre-Construction/ Construction</b>	Posters Brochures Annual reports Information Desk Public Consultation Meeting before commencement of construction Community meetings Company website Grievance tool on the website / call center / written application mechanism Media (press, tv and social media)	Before construction starts, during construction, Continuously /When Needed/When Requested
All stakeholders	Project Information on design, schedule, environmental and social impacts of the project construction, commissioning and operation, recruitment and procurement strategies of Project Grievance Mechanism Management of environmental and social risks of the Project Strategic Communication Plan Local Hiring Plan Community Investment Plan Livelihood Restoration Plan	<b>Operation</b>	Posters Brochures Annual reports Information Desk Community meetings Company website Grievance tool on the website / call center / written application mechanism Media (press, tv and social media) Media	During Operation, Continuously/When Needed/When Requested
Related Public Institutions All employees and contractors All ship operators	Bio-Diversity Management and Action Plan Staff training and awareness, Engagement activities Implementation of the mitigations	<b>Pre- Construction/Construction/Operation</b>	Posters Brochures Annual reports Company website Meetings Grievance tool on the website /	Continuously/When Needed/When Requested

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<sup>5</sup> The period between the disclosure and start of construction.

<sup>6</sup> Any formal meetings (included in ESIA disclosure period) will be advertised at least 10 days in advance and held at times convenient for stakeholders to attend.

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
			call center / written application mechanism	
Local communities and businesses in the neighborhoods	Constraints on sea view and Park usage by construction and operation activities Social projects Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	<b>Pre-Construction/ Construction</b>	Grievance tool on the website / call center / written application mechanism Thematic focus group meeting on 'landscape impacts` with participation of relevant urban planning experts, project representatives, architects, environmental engineers	Quarterly meeting Continuously/When Needed/When Requested
	Constraints on sea view and Park usage by construction and operation activities Social projects Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	<b>Operation</b>	Grievance tool on the website / call center / written application mechanism Thematic focus group meeting	Annual meeting Continuously /When Needed/When Requested
Tour Boats	The reduction of the promenade areas Visual impacts Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan Traffic safety and trainings	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
	The reduction of the promenade areas Visual impacts Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan Traffic safety and trainings	<b>Operation</b>		Six monthly meetings Continuously /When Needed/When Requested

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
Agency Boats	Schedule of the Project Construction period works and impacts Regular information sharing regarding port traffic Dredging works Livelihood Restoration Plan	<b>Pre-Construction Construction</b>	Face-to-face meetings In-depth interviews Grievance mechanism	When Needed/When Requested
Fisher men (amateur and commercial) at Çamlıbel Fishery	Access restrictions because of construction works Visual impacts Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Strategic Communication Plan MIP has already committed to restoring their breakwater should AFA attain necessary permits. MIP will continue monitoring situation and assessing alternative measures.	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
	Strategic Communication Plan Traffic safety and trainings	<b>Operation</b>		Six monthly meetings Continuously/When Needed/When Requested
Restaurant boats	Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Visual impacts Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
		<b>Operation</b>		Six monthly meetings Continuously/When Needed/When Requested
Atatürk Park users	Nuisance caused by construction activities (noise, dust, traffic, access to the Park)	<b>Pre-Construction/ Construction</b>	In-depth interviews	Monthly meetings Continuously /When

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
	Nuisance caused by operation activities (noise, traffic, access to the Park) Visual impacts Community Investment Plan Strategic Communication Plan	<b>Operation</b>	Grievance tool on the website / call center / written application mechanism the recording of visitor baselines and monitoring activities	Needed/When Requested Six monthly meetings Continuously /When Needed/When Requested
Event organizers at Atatürk Park and Congress Hall	Constraints on sea view and Park usage by construction and operation activities Exchange of information on schedules of specific noise and nuisance creating project activities Grievance tool on the website / call center / written application mechanism Sharing of noise baseline and modeling, Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
		<b>Operation</b>		Six monthly meetings Continuously /When Needed/When Requested
Atatürk Park businesses	Nuisance caused by construction activities (noise, dust, traffic, access to the Park, potential decrease in number of customers) Nuisance caused by operation activities (noise, traffic, access to the Park) Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism, the recording of visitor baselines and monitoring activities	Monthly meetings Continuously/When Needed/When Requested
		<b>Operation</b>		Six monthly meetings Continuously /When Needed/When Requested
Wider communities in Mersin in districts with vulnerable populations,	Environmental, urban and social impact Social projects Community Investment Plan	<b>Pre-Construction/ Construction</b>	In-depth interviews Dialogue and engagement meetings	Quarterly meetings Continuously/When Needed/When Requested

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
the village / civil society and local stakeholders	Strategic Communication Plan	<b>Operation</b>	Grievance tool on the website / call center / written application mechanism	Annual meetings Continuously /When Needed/When Requested
Community in settlement where quarry will be selected and other stakeholders	Environmental and social impact, traffic Social projects EPC contract Meetings with the EPC contractor and subs Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	In-depth interviews Dialogue and engagement meetings Grievance tool on the website / call center / written application mechanism	Monthly Meetings When Needed/When Requested
Business and Industry Unions (may have an interest in the project (other interested parties))	Procurement strategies of Project Business collaborations Strategic Communication Plan Local Hiring Plan	<b>Pre-Construction/ Construction</b>	Chambers of commerce meetings, industrial activities, specific meetings, supplier development programs	Semiannual meetings When Needed/When Requested During Construction
	Procurement strategies of Project Business collaborations Strategic Communication Plan Local Hiring Plan	<b>Operation</b>	Chambers of commerce meetings, industrial activities, specific meetings, supplier development programs	Before the operation starts Once in a year during the operation When Needed/When Requested During Operation
Non-governmental organizations (“NGOs”) in Mersin (may have an interest in the project (other interested parties))	Environmental Protection Urban Protection Preservation of the Cultural Heritage Negative perceptions regarding the management of potential issues, unexpected and emergent needs	<b>Pre-Construction/ Construction</b>	Dialogue and engagement meetings with interest groups/ NGOs Regular E&S progress update reports through website Leaflets, Digital information Posters	Before the construction starts Quarterly meetings When required/ When demanded

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
	during Project 's construction and operations Community Investment Plan Strategic Communication Plan Community Investment Plan Strategic Communication Plan	<b>Operation</b>	Media  Dialogue and engagement meetings with interest groups/ NGOs Regular E&S progress update reports through website Posters, Leaflets, Digital information Media	Before the operation starts Once in a year during the operation When required/ When demanded
Municipalities and Mukhtar offices (may have an interest in the project (other interested parties))	Management of environmental and social risks of the Project; and relations with the vulnerable groups Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Planned Meetings Brochures, Workshops	Minimum six monthly When required/ When demanded
		<b>Operation</b>	Planned Meetings Brochures, Workshops	Minimum six monthly When required/ When demanded
Local and National State agencies and relevant authorities (may have an interest in the project (other interested parties))	Project activities and schedule Management of environmental and social risks by the Project, permitting Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Meeting with governmental institutions MIP worksite visits	Continuously and When required
		<b>Operation</b>	Meeting with governmental institutions MIP worksite visits	Minimum six monthly When required
Communities & NGOs, Emergency services, police, fire station, health and gendarmerie (may have an interest in the project (other interested parties))	Incident, Accident and Emergency Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Meetings Posters Public meetings Grievance tool on the website / call center / written application mechanism	Continuously and When required
		<b>Operation</b>	Meetings Posters	Continuously and When required

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
			Public meetings Grievance tool on the website / call center / written application mechanism	
Media (may have an interest in the project (other interested parties))	Project activities Management of environmental and social risks by the Project Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Press conferences, Press releases, Media follow-up	Continuously and When required
		<b>Operation</b>	Press conferences, Press releases, Media follow-up	Continuously and When required
Unions (may have an interest in the project (other interested parties))	Labour Working Conditions Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Oversight meetings	Weekly scheduled Any time if needed
		<b>Operation</b>	Oversight meetings	Weekly scheduled Any time if needed
Vulnerable Groups (are affected or likely to be affected (directly or indirectly) by the project (affected parties))	Project activities near / around the Park Management of environmental and social risks by the Project Grievance mechanism Employment Any other interest of vulnerable groups Social Projects Community Investment Plan Strategic Communication Plan	<b>Pre-Construction/ Construction</b>	Thematic meetings with women and disabled users of the Park Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call center / written application mechanism	Meetings: six monthly during construction When required
		<b>Operation</b>	Thematic meetings with women and disabled users of the Park Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call center / written application mechanism	Meetings: Annual during operation When required
MIP and contractor/subcontractor employees	Employee welfare (i.e., health and safety) Community Investment Plan	<b>Pre-Construction/ Construction</b>	Face to face interview OHS Committee Trainings	Weekly, When required and With the grievance



Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
(directly or indirectly) by the project (affected parties))	Strategic Communication Plan Subcontractor Management Procedure Community Investment Plan Strategic Communication Plan		Company social events for employees Employee Grievance Mechanism MIP worksite visits	
		<b>Operation</b>	Face to face interview OHS Committee Trainings Company social events for employees Employee Grievance Mechanism	Monthly, When required and With the grievance

## 7.5 Consultation Process in the Pre-Construction (Disclosure) Stage

As seen in the SIA studies conducted within the scope of the project, public concerns and doubts are often due to lack of information on the Project. In addition, since there is a group that is against the Project, the stakeholder engagement activities to be done before starting the construction gain more importance. Prior to start of operations there should be again an intensive consultation process to update stakeholders regarding the Project's operational impacts and management plans.

According to stakeholder interviews and media research, the following activities are planned for the pre-construction/disclosure period:

- Thematic focus group meetings regarding the visual and livelihood impacts. Before the focus group meeting, carefully plan the group's composition and the discussion, create a non-threatening environment, ensure that participations feel free to discuss and offer their inputs.
  - Define the focus group clearly (tour boats, agency boats, restaurant boats, users of Atatürk Park etc.)
  - Prepare the plan (timeline, place, preparatory activities, material, invitation etc.)
  - Conduct the meeting
  - Prepare a brief report about the conclusion, findings etc. and provide feedback to stakeholders on questions/issues raised which were not responded in the meeting or require further explanation
- Round table meetings with opposition platform by an independent facilitator, conflict resolution professional.
- Public consultation meetings
  - In case with Covid-19 limitations: Meetings to be held using communication channels such as YouTube or Zoom that can be broadcast live and allow participants to ask questions and express opinions. It is recommended to have 5 days in a week to be selected before starting the construction. A certain number of participants can attend each meeting. Meeting dates and registration form should be published on MIP's website.
  - In case without Covid-19 limitations: Open-air meetings that the public can easily attend. Again, meeting dates should be published on MIP's website.
- Once the quarry is identified, focus group meetings and interviews with the affected community.

Previous table summarizes the stakeholder engagement activities for pre-construction/disclosure period.

## 8.0 Roles and Responsibilities

The roles and responsibilities in relation to the implementation of this plan are presented in the following table.

**Table 7: Roles and Responsibilities**

Roles of MIP Team	Responsibilities
General Manager	<ul style="list-style-type: none"> <li>▪ To approve this plan and allocation of the required resources</li> <li>▪ To assign required number of personnel and resources required for implementation</li> <li>▪ To take appropriate actions to address major Non-Conformities, based on audit and monitoring reports</li> <li>▪ To ensure that the complaint-request portal is monitored regularly once it has been implemented (it is currently under development), to track the number of grievances received, and to track the number of unresolved grievances</li> <li>▪ To keep track of unresolved grievances that escalate to other formal channels                             <ul style="list-style-type: none"> <li>▪ To monitor progress in terms of KPI implementation</li> <li>▪ To monitor the number of meetings organized and number of meetings planned</li> </ul> </li> </ul>
Corporate Communication Department	<ul style="list-style-type: none"> <li>▪ To support and coordinate critical enterprise communications to assure information released on time to all stakeholders</li> <li>▪ To write and edit materials for interacting with employees, media and varied key audiences pertinent to news and issues management</li> <li>▪ To ensure to present required sustainability and corporate reputation</li> <li>▪ To take the main responsibility for annual report and to support the preparation of sustainability report</li> <li>▪ To manage, write plus edit all employee communications inclusive of newsletter articles, video scripts, news updates, company collateral materials, speeches as well as varied communications.</li> <li>▪ To prepare website content, draft or review website content of company along with Digital Strategies and Social Media</li> <li>▪ To ensure the periodic measure communication delivery methods value to assure processes are effective as well as cost efficient.</li> <li>▪ To support top management in collaborating with business leaders to streamline, coordinate and improve communication with all employees</li> <li>▪ To develop integrated communications campaigns</li> <li>▪ To create informative and interesting press releases, press kits, newsletters, and related marketing materials</li> <li>▪ To prepare detailed media activity reports</li> <li>▪ To plan and manage the design, content, and production of all marketing materials</li> <li>▪ To work with different marketing departments to generate new ideas and strategies</li> <li>▪ To plan public relations, regional, national and global media activities</li> <li>▪ To support reviewing and preparing media Q&amp;A documents for the Company</li> <li>▪ To develop overarching company storylines for media</li> <li>▪ Social media management</li> <li>▪ Corporate Social Responsibility management</li> <li>▪ Involvement all the process of external events and organizations of the company.</li> <li>▪ Crisis communications planning and management</li> </ul>

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Roles of MIP Team	Responsibilities
	<ul style="list-style-type: none"> <li>▪ Strategically leading crisis communications efforts</li> <li>▪ To conduct media training for spokesperson and/or senior management as needed</li> <li>▪ To record all external stakeholder consultations and meetings<sup>7</sup></li> <li>▪ To record all internal and external grievances / requests (by whom, date, status, open, pending, closed etc.) in the Grievance Log/Database<sup>8</sup></li> <li>▪ To communicate with Department Head of Environmental Control and Protection, Legal Department and other relevant departments for evaluation of the grievances/requests</li> <li>▪ To provide feedback to stakeholders in max. 30 days after receiving grievance/request</li> <li>▪ To coordinate Media Relations to ensure transparent communication with local and national press and other media institutions through appropriate means as such press statements, meetings</li> <li>▪ To prepare annual communication strategy</li> <li>▪ To ensure that this Management Plan is implemented effectively by employees of MIP, construction constructor and sub-contractors</li> </ul>
Community Liaison Officer	<ul style="list-style-type: none"> <li>▪ To ensure that SEP is up to date and appropriate to the nature and scale of the Project</li> <li>▪ To communicate with Corporate Communication Department for evaluation of the complaints / suggestions</li> <li>▪ To make SEP available to all stakeholders, employees of MIP, construction constructor and sub-contractors</li> <li>▪ To ensure that SEP meets requirements of applicable legal requirements, commitments and standards</li> <li>▪ To act as a community liaison officer as the focal point for community concerns and will be conducting reach out activities</li> <li>▪ To ensure that action/measures related to stakeholder engagement directly under MIP responsibilities are carried out timely and adequately</li> <li>▪ To control effectiveness of SEP and performance of the construction constructor and sub-contractors through monitoring activities and external audits at the construction site</li> <li>▪ To collect, organize and review monitoring data and performance monitoring reports provided by the construction constructor and sub-contractors</li> <li>▪ To report all non-compliances and accidents/incidents related to SEP and implementation of approved corrective actions</li> <li>▪ To ensure grievance mechanism trainings is provided by HSE department to the construction constructor and sub-contractors, collect training record provided by the construction constructor and sub-contractors and review them</li> <li>▪ To present the progress in terms of KPIs to General Manager along with monthly reports</li> <li>▪ To monitor the EPC contractor and subcontractors to ensure their proper use of the grievance mechanism</li> <li>▪ Community insight</li> </ul>

<sup>7</sup> See Appendix 1

<sup>8</sup> See Appendix 2

Roles of MIP Team	Responsibilities
	<ul style="list-style-type: none"><li>▪ Community stakeholder mapping</li><li>▪ Information sharing</li><li>▪ Community engagement</li><li>▪ Community consultation</li><li>▪ Community grievance and dispute management</li><li>▪ Crisis management</li><li>▪ Reporting and documentation</li><li>▪ Implementing standards and managing scrutiny</li><li>▪ Baseline data gathering</li><li>▪ Monitoring</li><li>▪ Negotiation</li><li>▪ Land claims and resettlement</li><li>▪ Community issues management in conflict situations</li><li>▪ Local hiring</li><li>▪ Worker welfare</li><li>▪ Social investment</li></ul>
The EPC contractor and subcontractors	<ul style="list-style-type: none"><li>▪ They are not allowed to implement engagement activities directly but have to collaborate with MIP within the Plan and liaise regularly with Communication Officer to discuss status of activities and on emerging issues that should be included in engagement activities.</li><li>▪ If they receive complaints related to the EMH2 construction or operations they should let the Corporate Communications Department know so complaints can be added to the log and investigated in a timely manner.</li></ul>

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## 9.0 Grievance Mechanism

In order to prevent and/or resolve any grievances in a timely and effective manner, EBRD PR10 and IFC PS1 require establishing and maintaining a permanent mechanism for receiving and handling citizens' grievances, concerns and requests. Main principles of the Grievance Mechanism are:

- MIP will encourage the use of grievance mechanism by making the diverse grievance mechanisms (by website form, e-mail phone, WhatsApp, and written form) visible in different platforms such as social media, billboards, etc. to ensure an open-communication policy.
- Any grievance or request can be submitted verbally (face-to-face or by telephone) or in writing by post or e-mail or by filling in a grievance form<sup>9</sup> by any external or internal stakeholders. Grievance forms will also be placed where external stakeholders can access them such as in front of the administrative building or kiosks, information desks to be installed elsewhere.
- Stakeholders can raise their grievances and requests during any stakeholder engagement activity. All grievances will be recorded in the grievance log<sup>10</sup>.
- The stakeholders will be informed on the grievance mechanism during the stakeholder engagement activities.
- If the person filing a grievance would like to receive a written reply, the reliable contact details should be provided by that person.
- Both signed and anonymous grievances will be accepted. In both cases, any information on the grievance owner's personal details will not be shared with third parties and will be kept as strictly confidential.
- An investigation will be performed for each grievance and results will be recorded in grievance register. The issuer of the grievance will be informed on the findings of the assessment; whether the grievance is classified as appropriate or inappropriate.
- All project related grievances will be forwarded to Corporate Communication Department for preparing a reply and identifying mitigation measures, if appropriate. The registration of complaints will be completed within 7 days and the applicant will be informed along with the complaint registration number (SMS, written notification, WhatsApp, etc.). The proposed mitigation measures will be discussed in advance with the complainant as far as practical. The maximum period of grievance processing is 30 days. The prepared reply will be approved by the MIP and sent to the grievance owner in 30 days after the receipt of the grievance.
- If the grievance holder has contact information, he/she will be notified when the grievance is received, answered and resolved. If it is necessary to contact the contractors/subcontractors for problem resolution or mitigation measures, MIP and contractors act together.
- A register of grievances will be kept by Corporate Communication Department. This register will include grievance status detail.
- Same process above will be in place for the applications received from The Presidency's Communication Center (CİMER).
- The news in press and social media will also be followed and recorded in a media news log. Negative news and concerns raised through media channels/platforms will be analyzed by Corporate Communication Department and will be processed through the grievance mechanism.
- Court cases and protests will be followed through grievance mechanism by including them into the grievance log. Corporate Communication department will be working with Legal Affairs and

<sup>9</sup> See Appendix 3

<sup>10</sup> See Appendix 2



Security departments to include previous court cases and protests into the grievance mechanism.

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**The grievances to the MIP on the Project and Project activities can be forwarded through the following means:**

By MIP Telephone: +90 324 241 29 00

By MIP website: <https://www.mersinport.com.tr/iletisim/iletisim-formu/EMH-II-Projesi/583/6071/0>

**By Direct Line for grievance:**

By MIP E-Mail: [info@mersinport.com.tr](mailto:info@mersinport.com.tr)

By WhatsApp: +90 537 2243285

**There will be hard copies of grievance form at:**

- MIP Entrance Gate/Office
- Information Desk at Atatürk Park
- Çamlıbel Fishery
- Mersin Port Authority
- Akdeniz Municipality
- Chamber of Environmental Engineers Office
- Other locations defined by the PR company.

These forms can be addressed to

MIP CLO Tuğçe Kurnaz ([tkurnaz@mersinport.com.tr](mailto:tkurnaz@mersinport.com.tr))

Mersin Uluslararası Liman İşletmeciliği A.Ş.

Yenimahalle 101. Cad 5307. Sok. No:5 33100 Mersin - Turkey

Stakeholders can submit individual complaints to the EBRD's grievance mechanism IPAM: <https://www.ebrd.com/ipam>.

They can also contact the relevant offices of the IFC regarding their complaints and requests:

[https://www.ifc.org/wps/wcm/connect/REGION\\_\\_EXT\\_Content/IFC\\_External\\_Corporate\\_Site/Europe+and+Central+Asia/Contacts/](https://www.ifc.org/wps/wcm/connect/REGION__EXT_Content/IFC_External_Corporate_Site/Europe+and+Central+Asia/Contacts/)

IFC CAO Policy responds to recommendations from an independent external review and reflects feedback from extensive public consultations with complainant communities, civil society, IFC/MIGA clients, development finance institutions and other stakeholders. <https://www.worldbank.org/en/about/leadership/brief/external-review-of-ifc-miga-es-accountability>

## 10.0 Monitoring

MIP will monitor the implementation and effectiveness of the stakeholder engagement process by analysing the feedback received from dialogue and engagement activities. Monitoring results will be reported to the senior management through internal monthly reports, to the external stakeholders through sustainability disclosure, annual report, external monitoring reports, and to the Lenders through internal and external monitoring reports.

**Table 8: Key Monitoring Measures**

ID	Measure	Methods	Responsible Parties	Frequency
SEP-MON-01	Community and Employee Grievances	<i>separately for internal and external complaints;</i> <ul style="list-style-type: none"><li>▪ number of open complaints and grievances in the month</li><li>▪ number of complaints and grievances recorded in the</li></ul>	Corporate Communication Officer	Continuously

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ID	Measure	Methods	Responsible Parties	Frequency
		<ul style="list-style-type: none"> <li>month and from Project start</li> <li>▪ number of complaints and grievances resolved in the month</li> <li>▪ type of grievances</li> <li>▪ repeated grievances</li> </ul>		
SEP-MON-02	Community engagement activities	Records of formal and informal engagements with stakeholders.	Corporate Communication Officer	Every 3 months during construction, Every 6 months during operation
SEP-MON-03	Disclosure materials disseminated	Records of the types and numbers of engagement material such as leaflets, brochures, newsletters prepared and distributed.	Corporate Communication Officer	Every 3 months during construction, Every 6 months during operation
SEP -MON-04	Training	Records of trainings	Human Resources Department	Continuous
SEP-MON-05	Media Monitoring	Any media output that makes reference to MIP	Corporate Communication Department	Weekly during construction, Monthly during operation

## 10.1 Key Performance Indicators

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

**Table 9: Key Performance Indicators**

ID	KPI	Target	Monitoring Measure	Reporting
SEP-PER-01	Number of community and employee grievances separately	Total number reduced each reporting period	Complaints Log	Monthly reporting to management
	Number of grievances resolved/responded /closed in 30 days	Target of 100%		
SEP-PER-02	Stakeholder engagement activities performed No. responses issued to stakeholders within 30 days of any questions or comments raised	Target of 100% in accordance with the programme	Stakeholder engagement records	Monthly reporting to management

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SEP- PER- 03	Efficient use of disclosure materials	Use of disclosure materials at all engagement activities Number of people reached Number of shareholder groups reached	Stakeholder engagement records	Monthly reporting to management
SEP - PER- 04	% of visitors who have received relevant and adequate grievance mechanism training	100% compliance with training plan	Training records	Monthly reporting to management

A KPI report (or an excel format) will be prepared allowing the General Manager to quickly and easily review and analyze KPIs and thereby know how their organization is performing against SEP targets. This report will be submitted to the General Manager by the Corporate Communication Officer along with the monthly reports. This report will show the changes of each determined KPI. If the General Manager sees a problem with the objectives, he/she will contact Corporate Communication Officer in order to eliminate each problem.

## 11.0 Audit and Reporting

### 11.1 Internal Auditing

The correct implementation of this Plan is verified through internal Management System audits. The internal audit about grievance mechanism will be conducted by construction constructor and subcontractors weekly and by Corporate Communication Officer monthly. Preventive/Corrective actions will be identified after each audit. Top management review audit results and the Preventive/Corrective actions and defines additional measures if necessary.

### 11.2 External Auditing

Conformance with this plan will be subject to periodic assessment by MIP corporate audit and separately by EBRD and IFC.

### 11.1 Record Keeping

The following records will be kept in accordance with MIP procedures;

- Trainings records
- Community meetings records and material (e.g., leaflets, brochures) with gender disaggregated as committed, including minutes and list of participants
- Stakeholder engagement activities date, type and location
- Internal and external grievances and associated records (for sample template, please refer to Annex – 1).
- Opinions/suggestions provided by community members during stakeholder engagement activities
- Press releases and interviews
- Media surveys
- Audit results
- Routine ESMS performance reports

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## 11.2 Internal and External Reporting

1. Internal Reporting: MIP will prepare internal monthly reports on SEP activities, internal and external grievances, requests, CSR and LRP activities.
2. External Reporting: MIP will include the following as a minimum to the annual Environmental and Social Performance report to be produced quarterly during construction and annually during operation:
  - Summary of grievances
  - Summary of consultation and engagement activities together with the raised concerns regarding SEP

An annual review and summary of SEP reporting will be disclosed in the website.

## 12.0 Training

All relevant employees of MIP, construction contractor and subcontractors will have a stakeholder engagement and grievance mechanism training as part of site induction programme. All staff personnel will receive as part of their worksite induction information on the grievance mechanism and how to access it, including the need to direct complaints from third parties to the mechanism.

A training on SEP will be provided to construction contractor and subcontractors by ESMS Officer at the beginning of the construction works. The trained staff will be able to provide grievance mechanism trainings to their own workforce.

The training subjects at least includes:

- Requirements of SEP
- Legal requirements
- Grievance mechanism



## **APPENDICES**

**Appendix 1: Template for Stakeholder Consultation Log**

**Appendix 2: Template for Grievance Log**

**Appendix 3: Template for Grievance Form**

**Appendix 4: Stakeholder Engagements and Events**

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Knowledge to build with.*





## APPENDIX 3

# Template for Grievance Form

A – General Information		
Received by:		
Registration Form No:		
Registration Date:		
Registration Location:	<input type="checkbox"/> Field	<input type="checkbox"/> Office
Registry Type:	<input type="checkbox"/> Grievance	<input type="checkbox"/> Request
B- Received Through		
<input type="checkbox"/> Phone <input type="checkbox"/> Petition <b>(Copy of the petition must be added to this form)</b>	<input type="checkbox"/> Face-to-face <input type="checkbox"/> Meeting or focus group (halkı bilgilendirme toplantılar vs) <input type="checkbox"/> E-mail	<input type="checkbox"/> Other (CİMER etc.....)
C.1- About Grievance Holder		C.2- Stakeholder Category
Name Surname	Anonymous (when requested)	<input type="checkbox"/> Public Institution/Local Government <input type="checkbox"/> Local community (Individual) <input type="checkbox"/> Local community (Community) (number of community members.....) <input type="checkbox"/> Private sector <input type="checkbox"/> NGO <input type="checkbox"/> Contractor firm <input type="checkbox"/> Subcontractor firm <input type="checkbox"/> MIP employee <input type="checkbox"/> Contractor/subcontractor employee <input type="checkbox"/> Media
Contact Information	Tel: E-mail:	
Address		
Province/District		
Signature of the Grievance Holder <i>Only for grievances/requests received face-to-face, during meetings or office visits</i>		

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<b>D.1- About Grievance/Request</b>	<b>D.2- Grievance/Request Type</b>
<i>Detailed description of the grievance/request</i>	<input type="checkbox"/> Damage to building/land/structure <input type="checkbox"/> Environmental impact (pollution, dust, noise etc.) <input type="checkbox"/> Expropriation <input type="checkbox"/> Traffic risks <input type="checkbox"/> Request for employment <input type="checkbox"/> Working conditions <input type="checkbox"/> Dismissal <input type="checkbox"/> Payments of employee wages <input type="checkbox"/> Request for donation (individual) <input type="checkbox"/> Request for support/sponsorship (institutions) <input type="checkbox"/> Request for local community
<b>E- Actions to be Taken</b>	

## APPENDIX 4

# Stakeholder Engagements And Events

*Stakeholders Engaged by MIP in 2021 (sorted by date)*

No	Stakeholder Group	Institution	Date
1	Public Institution	Mersin Governorship (Governor Ali İhsan Su)	01.02.21

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2	Embassy	Denmark Embassy (Ambassador)	11.02.21
3	NGO/Chamber	Mersin Chamber of Shipping and Commerce (MDTO)	02.03.21
4	NGO/Chamber	Mersin Chamber of Commerce & Industry (MTSO)	03.03.21
5	NGO/Union	Union of Mediterranean Exporters (AKİB)	12.03.21
6	NGO/Association	Mersin Industrialists and Businesspeople Association (MESIAD)	20.04.21
	Embassy	The Ambassador of Netherland	21.04.21
7	Business Enterprise	Turkish and Arab Businessmen Association (TURAB)	22.04.21
8	Municipality	Akdeniz Municipality (Mayor)	28.05.21
9	Sports Club	Çukurova Women Basketball Club	25.06.21
10	Business Enterprise	Fisherman Restaurant Visit	29.06.21
11	Business Enterprise	COSCO	16.06.21
12	Municipality	Mezitli Municipality (Mayor)	06.07.21
13	NGO/Federation	Turkish Journalists Federation	02.08.21
14	Political Party	Azerbaycan Yükseliş Party	13.08.21
15	NGO/Think Tank	Member of Embassy and NOVUSENS	13.08.21
16	Political Party	IYI Party Mersin Deputy Zeki Hakan Sıdalı	23.08.21
17	Press	Sözcü Journalist Çiğdem Toker	27.08.21
18	Municipality	Akdeniz Municipality (Deputy Mayor)	01.09.21
19	Metropolitan Municipality	Mersin Metropolitan Municipality Press and Public Relations Department Head (courtesy visits)	01.09.21
20	Political Party	Ankara CHP (courtesy visits)	03.09.21

21	Municipality	Mersin Metropolitan Municipality Press and Public Relations Department Head Visit From MIP	07.09.21
22	Metropolitan Municipality	Mersin Metropolitan Municipality Principal Clerk	09.09.21
23	Municipality	Mersin University Sports Club	10.09.21
24	Public Institution/Education	Mersin International Port Primary School	21.09.21
25	Municipality	Mezitli Municipality (Mayor)	22.09.21
26	NGO/Association	Çamlıbel Amateur Fishermen's Association (Members of the Board of Directors)	22.09.21
27	NGO/Association	Mersin Çamlıbel Association	01.10.21
28	NGO/Union	Union of Mediterranean Exporters (AKİB)	07.10.21
29	Public Institution	Western Black Sea Development Agency & Çukurova Development Agency Delegation	08.10.21
30	NGO	Çamlıbel Amateur Fishermen's Association	29.10.21
31	Business Enterprise	Tour Boat Owner	09.11.21
32	Embassy	British Embassy Ankara	10.11.21
33	Embassy	US Ankara Embassy Consular	18.11.21
34	NGO/Association	Çamlıbel Amateur Fishermen's Association (Members of the Board of Directors)	25.11.21
35	NGO/Association	Association of International Forwarding and Logistics Service Providers (UTIKAD)	01.12.21
36	Public Institution/Education	İçel İdman Yurdu	03.12.21
37	Public Institution/Education	Toros University	22.12.21
38	Business Enterprise	Tour Boat Owners	23.12.21
39	Political Party	Member of CHP parliament Cengiz Gökçel	24.12.21
40	Municipality Project	Mersin Logistics Training Center (Akdeniz Municipality Project-Visit by Akdeniz Municipality)	18.01.22



		Mayor, MIP GM, Mersin Chamber of Commerce Chairman)	
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*2022 Stakeholder Meetings And Events*

<i>Global</i>	No	Stakeholder Group	Instution	Date
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*Infrastructure Consultants*

**Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information**

1	Business Enterprise	IHDS Committee	29.03.2022
2	Business Enterprise	TURKLIM HSE Workshop	13.05.2022
3	Business Enterprise	ARKAS Visit	1.06.2022
4	Business Enterprise	Visit to Dervişoğlu Bakliyat	1.06.2022
5	Business Enterprise	CNR Group Visit	3.08.2022
6	Business Enterprise	IFM Board Members Visit	22.08.2022
7	Business Enterprise	U.S. Grains Council Visit	10.09.2022
8	Business Enterprise	PRO Gtos Representatives Visit	14.09.2022
9	Business Enterprise	ROTA PR Agency Visit	20.12.2022
10	Business Enterprise	Simernet	21.12.2022
11	Business Enterprise	BN Hotel Courtesy Visit	17.08.2022
12	District Municipality	Visit to Akdeniz Municipality Logistics Training Center	18.01.2022
13	District Municipality	Visit to Mersin Mezitli Municipality	18.04.2022
14	District Municipality	Akdeniz Municipality Logistics Vocational Training Center Trainees Visit	15.06.2022
15	District Municipality	Akdeniz Municipality Mayor	3.08.2022
16	District Municipality	Mezitli Municipality Mayor	20.12.2022
17	Embassy	Minister Counsellor Mr. Angel Gutierrez Hidalgo, Head of Economic and Social Development at the EU Delegation to Turkey	28.02.2022
18	Embassy	Ambassador of Belgium Visit	21.03.2022
19	Embassy	Ambassador of Sri Lanka - Combo Visit	26.03.2022
20	Embassy	Guatemala Ankara Ambassador Visit	6.04.2022
21	Embassy	Republic of Kongo Delegation Visit	13.05.2022
22	Embassy	Ambassador of Australia Visit	20.05.2022
23	Embassy	Ambassador of France Visit	8.06.2022
24	Embassy	The Ambassador of Lithuania's visit	23.09.2022
48	Embassy	Sweden Embassy Visit	2.12.2022
50	Impacted Community	Tour Boat Owners Visit	7.03.2022
51	Impacted Community	Visit to Tour Boat Owners	22.06.2022
52	International Media	Lemonde Visit	11.10.2022

53	International Organisation	EBRD & IFC Visit to MIP	21.06.2022
54	International Organisation	United Nations Help Commission	13.10.2022
55	Metropolitan Municipality	Adana Metropolitan Municipality Mayor Zeydan Karalar Visit	20.12.2022
56	NGO	Mersin Journalists' Association	10.01.2022
57	NGO	LOSEV Visit	31.03.2022
58	NGO	29 October Republican Women's Association Visit to MIP	24.06.2022
59	NGO	TURMEPA Blue Ambassadors Project Team Visit to MIP	29.06.2022
60	NGO	TURMEPA Visit	29.09.2022
61	NGO	Mersin KIZILAY Region Presidency Visit	12.10.2022
62	NGO	DARGEZ Visit	24.11.2022
63	NGO	Mersin Goodness and Charity Foundation Visit	30.11.2022
64	NGO/Association	BAGIAD Visit	18.03.2022
65	NGO/Association	ÇUGİDER Visit	22.03.2022
66	NGO/Association	MUSIAD Seminar	20.05.2022
67	NGO/Association	Çukurova SİFED Visit	6.10.2022
68	NGO/Association	Çukurova SİFED Visit	4.11.2022
69	NGO/Association	MESIAD Visit	18.11.2022
70	NGO/Association	TURKONFED Gala Dinner	2.12.2022
71	NGO/Association	President of TİSİAD Visit	12.12.2022
72	NGO/Association	ÇUGİDER Butterfly Disease Gala Dinner	16.12.2022
73	NGO/Chamber	MTSO Chairman Visit	20.06.2022
74	Public Institution	Transportation Vocational and Technical Anatolian High School Visit	26.01.2022
75	Public Institution	Adana Gülbahçesi Highschool Visit	19.04.2022
76	Public Institution	Visit to Turkey Customs General Manager	24.05.2022
77	Public Institution	Mersin Governor Visit	15.06.2022
78	Public Institution	Mersin Governor	14.11.2022
79	University	Gaziantep University Naci Topçuoğlu Vocational School Visit	21.03.2022
80	University	Mersin University Maritime Faculty Visit	11.05.2022

81	University	Mersin University Faculty of Architecture Students and Faculty Members Visit	18.10.2022
82	University	Çağ and Tarsus University Lecturers	20.10.2022
83	University	Atılım University Visit	28.11.2022
84	University	Mersin University Maritime Department Visit	7.12.2022
85	University	Niğde Ömer Halisdemir University Visit	21.12.2022

### Stakeholder Meetings And Activities By The End Of May 2023

No	Stakeholder Group	Instution	Date
1	Business Enterprise	Aksun Tarım	6.01.2023
2	Business Enterprise	Uğur Private School	17.01.2023
3	Business Enterprise	Hill International	18.05.2023
4	District Municipality	Mezitli Mayor	4.04.2023
5	Embassy	Egypt Foreign Minister Sameh Shoukry	28.02.2023
12	Impacted Community	Boat Owners Association Visit	24.05.2023
13	Minister	Türkiye Foreign Minister Mevlüt Çavuşoğlu	28.02.2023
14	Minister	Türkiye Minister of Treasury and Finance Nureddin Nebati	3.05.2023
15	Muhtars	Camiserif, Kültür and 3 Ocak Neighbourhood Mukhtars	5.01.2023
16	NGO/Association	Mersin Transportation Association	3.01.2023
17	NGO/Association	TİSİAD	5.04.2023
18	NGO/Association	Mersin Customs Brokers Association Board Members	11.04.2023
19	NGO/Association	MÜSİAD	12.04.2023
20	NGO/Association	Meeting with The President and BMs of the Transporters	27.04.2023
21	NGO/Chamber	MTSO Chairman	13.01.2023
22	NGO/Chamber	MTSO Chairman Assembly Hamit İzol	13.01.2023
23	NGO/Chamber	MTSO Board Member	18.01.2023

24	NGO/Chamber	Mezitli Transportation Services Vocational and Technical High School	26.01.2023
25	NGO/Chamber	MTSO Board Member	7.04.2023
26	Political Party	IYI Party Deputy Candidates	11.05.2023
27	Public Institution	Mersin Governor	27.01.2023
28	Public Institution	Visit to Governor	27.03.2023
29	University	Mersin University Visit	26.05.2023