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MINISTRY OF ENVIRONMENT, URBANIZATION AND CLIMATE
CHANGE
GENERAL DIRECTORATE OF LAND REGISTRY AND CADASTRE



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**LAND MANAGEMENT INFRASTRUCTURE PROJECT FOR
GREEN AND SUSTAINABLE DEVELOPMENT**

(P179217)

Negotiated Final
STAKEHOLDER ENGAGEMENT PLAN (SEP)

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List of Abbreviations

| | |
|--------|--|
| CIMER | Presidency Communications Center |
| E&S | Environmental and Social |
| ESCP | The Environmental and Social Commitment Plan |
| ESF | Environmental and Social Framework |
| ESSs | Environmental and Social Standards |
| MoEUCC | MINISTRY OF ENVIRONMENT, URBANIZATION AND CLIMATE CHANGE |
| GBV | Gender-Based Violence |
| GD | General Directorate |
| GRM | Grievance Redress Mechanism |
| GRS | Grievance Redress Service |
| M&E | Monitoring and evaluation |
| OIP | Other Involved Parties |
| PCU | Project Coordination Unit |
| PIU | Project Implementation Unit |
| SEA/SH | Sexual Exploitation and Abuse / Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| TKGM | General Directorate of Land Registry and Cadastre |
| TKMP | Land Registry and Cadastre Modernization Project |
| ToR | Terms of Reference |
| WB | The World Bank |

Terms

Grievance Mechanism is an accessible and inclusive system, process or procedure that receives and acts on grievances and suggestions for improvement on time and facilitates the redressal of grievances and concerns arising regarding a project.

Implementing Agency refers to General Directorate of Land Registry and Cadastre which takes on the overall responsibility of the project.

Project refers to Land Management Infrastructure Project for Green and Sustainable Development.

Project Coordination Unit (PCU) refers to Land Management Infrastructure for Green and Sustainable Development Project (TKGM) staff responsible for the overall coordination of the Project including monitoring and reporting to the World Bank.

Project Implementation Unit refers to the staff of the PIU responsible for project implementation, including the preparation and implementation of ESF tools.

Provincial Organization refers to the provincial organization of the General Directorates including (i) the Directorates of Land Registry and Cadastre directly affiliated to the General Directorate of Land Registry and Cadastre.

Stakeholder refers to the: (a) parties that are either affected or potentially affected (parties affected by the project) and (b) individuals or parties that may be relevant (other relevant parties).

Stakeholder Engagement is a continuous process exercised by the project in order to arouse a sense of ownership, accessing the acknowledged outcomes and incorporating stakeholders regarding a specific purpose. Throughout the project, identification and analysis of stakeholders include several engagements and activities such as stakeholder consultation, negotiations and partnerships, grievance management, engagement of stakeholders in project monitoring, reporting to stakeholders and management functions. It includes both governmental and non-governmental actors.

Stakeholder Engagement Plan (SEP) is a tool regarding the management of communication with project stakeholders at sub-project or activity level. SEP shall define the methods and timing of engagements with stakeholders throughout the project's life cycle, as determined between the Bank and the Borrower, through distinguishing between project affected parties and other relevant parties. Furthermore, alongside clarifying the extent and timing of the information to be transferred, to the project affected parties and other relevant parties, SEP shall also disclose the type of the required information as well. SEP may initially be prepared as a framework tool in cases where a project is composed of a programme and/or a range of sub-projects and where stakeholder(s) engagement programme could not be comprehensively defined until the details of a programme/sub-project are determined.

Executive Summary

The Stakeholder Engagement Plan (SEP), has been developed regarding the "Land Management Infrastructure for Green and Sustainable Development Project" which shall be implemented by General Directorate of Land Registry and Cadastrate (TKGM), on behalf of Turkish Government, and financed by the World Bank (WB). The SEP, has been prepared in line with *WB's Environmental and Social Standards (ESS) 10: Stakeholder Engagement and Environmental and Social Framework's (ESF) Information Disclosure*.

Project Development Goal is to increase the presence, accuracy and accessibility of land management information alongside with solidifying geographical knowledge infrastructure of Türkiye for data sharing and analysis.

Project Components. This project shall be implemented over three components:

- Component A: Generating City Models and Updating Cadastral Data
- Component B: Real Estate Appraisal
- Component C: Institutional Capacity Building and Project Management

SEP's purpose. Stakeholder engagement is a comprehensive process that shall be conducted throughout the project life cycle. When properly designed and implemented, it fosters the development of strong, constructive, and responsive working relationships, which are crucial for the effective management of the project's environmental and social impacts and risks. SEP shall assist managing stakeholder expectations alongside with bolstering the risk management, thus it shall minimize potential conflicts and delays by providing frequent and clear communication throughout the project life cycle.

Identified stakeholders and their types regarding this project are mentioned below:

- **Project affected parties** refers to the individuals or groups that are either affected or likely to be affected by the project due to the actual or potential impacts on their physical entourage, health, safety, cultural exercises, well-being or income sources.
- **Other relevant parties** refers to individuals or groups that are related to the project based upon the matters regarding either public interest or location, characteristics and impacts of the project. For instance, these parties may include legislators, government officials, the private sector, the scientific community, academics, trade unions, women's organizations, other non-governmental organizations and cultural groups.
- **Vulnerable/Disadvantaged Parties** refers to individuals or groups who are more likely to be adversely affected by project impacts due to their special conditions and/or whose ability to exploit the benefits of the project is limited compared to others. Such an individual/group is more likely to be excluded from the mainstream consultation process and therefore may require special measures and/or assistance.

During the **Stakeholder Engagement** special importance shall be attached to below mentioned principles:

- It shall include two-way communication,
- It shall avoid manipulation and oppression
- It shall provide equitable representation for stakeholders in terms of gender, age, socioeconomic level and education.

The scope of SEP SEP shall commence with an introduction that comprises the purposes and

goals of SEP. Project components are highlighted within chapter two. Effective national legislation regarding stakeholder engagement and requirements of World Bank's Environmental and Social Standards (ESSs) are presented within chapter three. Stakeholder identification and analysis are presented within chapter four. Implementation arrangements are given under chapter five and Grievance Redress Mechanism (GRM) is presented in detail within chapter six. Finally, requirements related to the monitoring and reporting of stakeholder engagement process are described under chapter seven.

Turkish and English versions of the ESF tools (SEP and ESCP) prepared for the proposed Project shall be published on the Project website (<https://www.tkgm.gov.tr/projeler/yesil-ve-surdurulebilir-kalkinma-icin-3b-arazi-yonetim-altyapisi-projesi>) in April 2023.

Due to the COVID-19 restrictions, consultations with the stakeholders shall be conducted virtually in April 2023. The participants shall be invited by TKGM via e-mail. Participant list and meeting screenshots shall be attached to the plan.

1. Introduction

This document is a Stakeholder Engagement Plan (SEP) describing the stakeholder consultation and engagement process that shall be planned and implemented for the Land Management Infrastructure for Green and Sustainable Development Project (Project) implemented by the General Directorate of Land Registry and Cadastre (TKGM) and financed by the World Bank (WB).

The SEP, has been prepared in line with WB's *Environmental and Social Standards (ESS) 10: Stakeholder Engagement* and Environmental and Social Framework's (ESF) Information Disclosure.

The project is expected to strengthen Türkiye's geographic information infrastructure to improve the availability, accuracy and accessibility of land management, and for the sharing and analysis of data.

Stakeholder engagement is a comprehensive process that shall be conducted throughout the project life cycle. When properly designed and implemented, it fosters the development of strong, constructive, and responsive working relationships, which are crucial for the effective management of the project's environmental and social impacts and risks. SEP shall assist managing stakeholder expectations alongside with bolstering the risk management, thus it shall minimize potential conflicts and delays by providing frequent and clear communication throughout the project life cycle.

Additionally, SEP helps to achieve below-mentioned goals: (i) establishing a systematic approach regarding stakeholder engagement, which is the main objective of SEP, (ii) evaluating stakeholder interest, impact and support for the project and ensure that stakeholder views are taken into account in project design and environmental and social performance, (iii) ensuring the timely share of technically and culturally appropriate project information on environmental and social risks, in an understandable and accessible manner, (iv) organizing specific communication, outreach and engagement activities to identify disadvantaged and vulnerable individuals/groups and ensure their participation in the project and (v) providing an accessible and inclusive mechanism for the communication of suggestions and grievances to project-affected persons (PAPs) and for implementing agencies to respond to and manage them in a timely manner.

The SEP presents the strategy of the PIU, which aims to communicate with stakeholders who may be affected by the project or who shall be involved during the project. Moreover, it describes both PIU's approaches regarding suggestions and grievances, evaluation, responding and decision making together with grievance redress mechanism (GRM) to be established for stakeholders to transfer their suggestions and grievances to PIU. It is possible to update SEP document whenever necessary including any revision on project design and feedbacks from stakeholders.

The draft SEP will be disclosed and consulted on the official website of TKGM in both Turkish and English. This SEP will be updated in line with feedback and suggestions received from project beneficiaries and stakeholders during the consultations and evaluation period.

2. Project Background

2.1. Project Development Goal

Türkiye has made great progress for establishing a modernized land registry cadastre system over the last two decades. Cadastral database has been significantly improved by means of a renovation and digitalisation programme regarding the cadastre. A number of further improvements are needed to achieve the goal of a fully upgraded digital cadastre system. General Directorate of Land Registry and Cadastre (TKGM) has employed private mapping companies in order to carry out a study of this scale and has been successful. Alongside increasing the sectoral capacity, which otherwise would not be adequate to achieve the goals regarding the developments regarding cadastre, this also enabled the revitalization of private sector.

The ratio of urban population increased from 25% in 1960 to 65% in 2015 and 75% in 2015. Today, Türkiye's population reached up to more than 80 million people, 75% of which are living in urban areas where the annual growth rate is 2%. Rapid migration and urban growth have caused numerous economic, social, political and cultural challenges in cities. Rapid urbanization has led to the construction of informal housing and buildings. Despite a series of amnesties to register these informal buildings, the problem remains that land registries do not provide policy makers with accurate information on land use.

The most important goal of the project is to focus on the sustainability and durableness of cities. The project shall enhance existing land and building data and generate new ones, together with integrated spatial data management systems, which are key elements in developing a more efficient property appraisal system and more integrated spatial planning; making Türkiye better prepared to respond to natural disasters, helping to generate additional sources of revenue and supporting Türkiye's determined climate policies. One of the goals within the scope of Türkiye's 2019-2023 National Development Plan (NDP) is to establish "habitable cities and sustainable environment". Through this project; (i) sustainable urban transformation through improved land policies, (ii) completion of cadastral modernization, (iii) update of geographic information systems, (iv) production of multidimensional cadastral data and maps, and (v) development of a real estate appraisal system shall be supported. The project also contributes to the implementation of the National Geographic Information Strategy and Action Plan, which promotes the development of an integrated geographic information production and sharing infrastructure that provides quality, up-to-date and dynamic geographic information transferred to all sectors benefiting from the geographic data infrastructure. This shall build on Türkiye's Climate Change Action Plan (2011-2023), which identifies a number of actions in order to establish an integrated information management system to enhance information flow and exchange within national climate change initiatives.

The project development goal is to strengthen Türkiye's geographic information infrastructure to improve the availability, accuracy and accessibility of land management, and for the sharing and analysis of data.

2.2. Project Components

The project shall be implemented over three components.

The project shall be implemented through four below-mentioned components by General Directorate of Land Registry and Cadastre (TKGM).

Component A: Generating 3D City Models and Updating Cadastral Data This component shall support: (i) generation of 3D City Models based on the work carried out under the Amasya

pilot scheme and (ii) completion of the update and verification of cadastral data for the remaining 6 million parcels. The project shall cover an area of 40.000 km² (including residential, commercial and industrial properties) in designated metropolitan across all 81 provinces in Türkiye. TKGM shall form a chart describing all the key activities to funded within the scope of this component, estimated costs and their prioritisation together with targeted municipalities and provinces for each activity group. This component requires a multi-institutional/multi-partner initiative involving the Cadastre Department, Land Registry Department, Mapping Department and Information Technologies Department of TKGM as well as municipalities, Ministry of Finance, Ministry of Interior General Directorate of Civil Registration and Nationality (MAKS address system) and Ministry of Environment, Urbanization and Climate Change General Directorate of GIS. Sustainability and maintenance of 3D City Models shall also be clearly addressed. TKGM has developed a system for managing the 3D City Models that are currently in the final testing and deployment phase. Furthermore the project shall also attach great importance to strengthening of municipal capacities about both retaining and sharing crucial data.

Component B: Real Estate Appraisal Project, based on the experiences gained in mass appraisal pilot projects (financed by the Bank and carried out within the scope of TKMP), shall support the establishment of a mass appraisal system in Türkiye through (i) establishing a value information center for real estates; (ii) determination of the collective valuation model of real estates; (iii) establishment of an appeal system; and (iv) preparation of objection system, policy and legal infrastructure. TKGM has been tasked by the Government of Türkiye to develop a mass appraisal system; this component shall help realize an important aspect of Turkey's National Development Plan. Component B shall establish a system to produce market values of individual property units, primarily by using a mass appraisal system. Appraisals can be used for many purposes and are one of the fundamental data sets in an NSDI. They are primarily used for taxation. The primary tax is the annual recurrent property tax, but appraisals should also be used for other property-based taxes, including real estate transfer taxes, title deed fees, inheritance taxes and capital gains taxes. Other practices include identifying sensitive uses for disaster prevention and recovery plans, improving disaster risk financing and insurance, and updating the value of collateral received by the banking sector for asset-backed loans. As the appraisals are valid for the day they are carried out, a mass appraisal system ideally should be able to update market values annually and at intervals not exceeding three years.

The focus shall be placed on the collection of necessary information and data for mass appraisal; the design and implementation of the system for archiving, management, transfer and dissemination of data; and the hardware and software update investments thereto. It is thought that important preliminary studies need to be carried out to determine the hardware and software requirements and matters pertaining to procurement. There is also a need to work on improving information flows from those who have access to transaction prices and information on the characteristics of buildings to TKGM and on data quality management. In order for a mass appraisal to be carried out, information on the specifications of the buildings and their location is required. However, some of this data, including detailed zoning and settlement plans for all properties and the specifications of individual units, is not currently available. Although systems improving the information flow to TKGM on new buildings, a series of data need to be collected on existing buildings, including unregistered buildings, for a mass appraisal to be carried out. Municipalities shall be an important source of important data (zoning plans, zoning restrictions and architectural drawings). Smaller provinces and towns may lack technical staff and

financement to manage a system which would provide information on new buildings and fill the information gaps on data of existing buildings. Therefore, capacity building activities shall be included to enable municipalities to provide reliable data in the format (digitized/vectorized) which shall be shared/uploaded to the TKGM system (TAKBIS) and other systems as needed. There is currently no reliable database recording transaction prices. In many past instances, buyers and sellers have been known to declare a lower price as the purchase price than the actual price. As a result, a need to develop database of representative price data encompassing the data from mortgage valuations, auctions and listing agencies shall emerge.

Component C: Institutional Capacity Building and Project Management This component shall support capacity building and training of TKGM staff as well as other key stakeholders who are producers and/or users of geographic data (e.g. municipalities, Ministry of Interior DG of Civil Registration and Citizenship Affairs and other relevant parties). The component shall also finance consultancy services for data exchange/system interoperability, UKVA, IT system assessments, system and software design and software development as well as policy analysis and proposed legislative revisions that may be required as a result of project implementation. The project could also support the development of an automated M&E system that allows data entry by multiple stakeholders (TKGM Departments, municipalities, DG GIS, as well as DG Civil Registration and Citizenship Affairs); however, the workload may challenge TKGM's capacity in this regard. Activities under this component shall provide support to all functions of project management.

3. National Legislation and ESS Requirements

The national legislation and World Bank Environmental and Social Standards (ESS) requirements that apply to stakeholder engagement shall be reviewed in this section.

3.1. National Legislation for Stakeholder Engagement

Constitution of the Republic of Türkiye

Stakeholder engagement is guaranteed by the Constitution of the Republic of Turkey. The Constitution contains provisions to ensure that people can freely express their views. Article 25 of the Constitution of the Republic of Türkiye is the article on 'Freedom of thought and opinion'. According to this article, 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. As stressed in 'Freedom of Expression and Dissemination of Thought (Article 26 of the Constitution of the Republic of Türkiye)', 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. According to Article 74 of Constitution of the Republic of Türkiye, everyone has 'Right of Petition'. Citizens and foreigners resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and grievances concerning themselves or the public.

Presidency's Communication Center (CİMER) is an official government tool used to receive requests, grievances and applications from the public. CİMER's communication channels are as follows:

Website <https://www.cimer.gov.tr> <https://giris.turkiye.gov.tr/>

| | |
|---------------------|--|
| Help line | 150 |
| Mail address | TC Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara |
| Tel | +90 312 590 2000 |
| Fax | +90 312 473 6494 |

Public institutions provide requested information in 15 business days. If the requested information or document is to be obtained from another unit within the relevant institution, or if the opinion of another institution is required, or if the content of the application concerns more than one institution; access shall be provided within 30 working days. In such cases, the applicant is notified in writing of the extension and the reasons within 15 business days (Article 11).

Law on the Right to Obtain Information (No. 4982): The object of this law is to regulate 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. According to Article 5 of the Law on the Obligation to Provide Information, the institutions are required to apply administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access information promptly, effectively and correctly.

Law No. 3071 on the Exercise of the Right to Petition: Pursuant to Article 3 of the "Law on the Exercise of the Right to Petition" (Official Gazette No. 3071 dated 01.11.1984), citizens of the Republic of Turkey may submit their grievances to the Turkish Grand National Assembly by written petition. Foreigners residing in Turkey may benefit from this right, subject to reciprocity and the use of Turkish in their petitions.

Environmental Impact Assessment Regulation (25.11.2014/29186):

The Environmental Impact Assessment (EIA) Regulation (Official Gazette No. 29186 dated 25.11.2014) prepared under Article 10 of the Environmental Law (1983) requires a project to hold a public information meeting. According to this Regulation, the main purpose of the public information meeting is to inform and consult the public about the project. The Regulation requires the meeting to be held at the project site in a manner accessible to relevant persons; the date and location of the meeting must be approved in advance by the Governor and announced in a local and national newspaper at least 10 days before the meeting. Similar announcements shall be made by the Governorate staff to the surrounding neighborhoods and districts.

Such proceedings should be recorded by representatives of Ministry of Environment, Urbanisation and Climate Change. These written comments and recommendations should be reviewed throughout the life cycle of the project.

3.2. International Legislation for Stakeholder Engagement

Human rights

The Universal Declaration of Human Rights is a declaration that defines and guarantees the fundamental rights and freedoms of women, men and children. The Declaration also provides general definitions of economic, social and cultural rights, as well as civil and political rights. Article 1 of the Declaration states that "All human beings are born free and equal in dignity and

rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood." and all articles address the fundamental, cultural, economic, political and social rights of people all over the world. The Declaration, together with the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the Optional Protocols, constitute International Human Rights Law.

World Bank Requirements

Environmental and Social Standard (ESS) 10 of the WB's Environmental and Social Framework (ESF) recognizes 'the importance of open and transparent engagement between the borrower and project stakeholders as an essential element of good international practice'. The general requirements set by the ESS are summarized below;

- "Borrowers shall engage with stakeholders throughout the project life cycle by initiating engagement as early as possible in the project development process and within a timeframe that allows for meaningful consultation with stakeholders on project design. The nature, scope and frequency of stakeholder engagement shall be proportionate to the nature and scale of the project and its potential risks and impacts."
- "The borrowers shall engage in meaningful consultations with all stakeholders. The Borrowers shall provide stakeholders with timely, relevant, understandable and accessible information and consult with them in a culturally appropriate manner, free from manipulation, interference, coercion, discrimination and intimidation."
- "The stakeholder engagement process shall, as set out in more detail in this ESS, include the following: (i) stakeholder identification and analysis; (ii) planning how engagement with stakeholders shall take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) handling and responding to grievances; and (vi) reporting to stakeholders."
- "As part of the environmental and social assessment, the borrower shall maintain and disclose a documented record of stakeholder engagement, including a description of stakeholders consulted, a summary of feedback received, and a brief explanation of how the feedback was taken into account or why it was not (World Bank, 2017: 98)".

According to ESS10, the Borrower should propose and implement a grievance redress mechanism (GRM) to receive and resolve in a timely manner the concerns and grievances of project affected parties regarding the environmental and social performance of the project. The scope, scale and type of the GRM shall be proportionate to the nature and scale of the potential risks and impacts of the project.

The GRM may include: (i) enabling grievances and concerns to be raised in person, by telephone, email and/or website; (ii) a log where grievances are recorded in writing and maintained as a database; (iii) publicly disclosed procedures setting out the time users can expect to wait for their grievances to be acknowledged, responded to and resolved; (iv) transparency about the grievances procedure, management structure and decision-makers; (v) where a grievance is not resolved, an appeals process (including national jurisdiction) to which unsatisfied grievances can be referred.

4. Stakeholder Engagement Process

4.1. Identification of Stakeholders

Stakeholder identification is an important step in managing the overall stakeholder engagement process and reduces the risk of a particular stakeholder group dominating the consultation process. It should take place as early as possible in the project life cycle and also take into account the dynamics between stakeholders and the risks and opportunities of their involvement in the Project. Stakeholder identification is based on the interest of stakeholders and the degree of their interaction with the project. In ESS 10, project stakeholders are classified into three groups:

- **Project affected parties** refers to the individuals or groups that are either affected or likely to be affected by the project due to the actual or potential impacts on their physical entourage, health, safety, cultural exercises, well-being or income sources.
- **Other relevant parties (ORP)** refers to individuals or groups that are related to the project based upon the matters regarding either public interest or location, characteristics and impacts of the project. For instance, these parties may include legislators, government officials, the private sector, the scientific community, academics, trade unions, women's organizations, other non-governmental organizations and cultural groups.
- **Vulnerable/Disadvantaged Persons/Groups** refers to persons, individuals or groups who, due to their special circumstances, are more likely to be adversely affected by project impacts and/or whose ability to benefit from the project is more limited than others. Such an individual/group is also more likely to be excluded from the mainstream consultation process and therefore may require special measures and/or assistance to do so.

The frequency and appropriate engagement methods/tools for different stakeholder groups are determined based on the following three criteria;

- The extent of the project's impact on the stakeholder group,
- The extent of stakeholder group's impact on the project, and
- Culturally acceptable methods of participation and dissemination of information.

In general, engagement is directly proportional to the level of interest and impact, and the greater the scope of a project's impact on a stakeholder group, or the greater the scope of a particular stakeholder's impact on a project increment, the greater the need to engage with that stakeholder group. Engagement with such stakeholder groups should be deepened in terms of the frequency and intensity of the engagement method used.

In addition, citizens who are already using unregistered buildings and residences within the scope of the project shall not be directly or indirectly affected by the project. However, it is thought that they may be affected as a result of the actions that can be taken by the central and local governments according to the project outputs.

The stakeholder list given is given in Table 1 in indicative form. In order to ensure a smooth and timely functioning of this mechanism, a Grievance Redress Mechanism (GRM) contact person shall be appointed as part of the PIU to oversee the entire process. The GRM focal point shall also be responsible for reporting on the grievance redress process of the project for monitoring purposes. This person shall also be responsible for coordinating the grievance redress mechanism to ensure its smooth functioning within the project and provide channels for

project stakeholders to provide feedback and/or raise concerns about project activities.

All information about the project will be made available on the official websites of the General Directorate of Land Registry and Cadastre and the World Bank, via SMS and through the social media accounts of TKGM, which shall serve as a media tool/channel for communication with stakeholders. Within the scope of the project, brochures, booklets, booklets and/or posters shall also be prepared to inform stakeholders about project activities.

PIU shall be responsible for the sharing, delivery and dissemination of project/sub-project documents, communication materials and GRM.

Table 1. Stakeholder Groups for Project

| Components | Stakeholder Category | Stakeholders | Level of Interest | Level of Impact |
|---|---|--|-------------------|-----------------|
| Component A: Generating 3D City Models and Updating Cadastral Data Subcomponent 1: Creating 3D City Models | Project-Affected Parties | Immovable owner Citizens, Immovable owner Public Institutions and Organizations, Immovable owner Private Organizations | Low | Moderate |
| | Other Involved Parties | Financial Institutions (Banks), Private survey engineering offices (Licensed Surveying and Cadastre Engineers and Offices (LĪHKAB) and Freelance Engineering Offices), Courts and Lawyers owing to project outputs, Investor Public Institutions and Organizations, Universities, Municipalities, Neighborhood Representatives | Low | Moderate |
| | Vulnerable/Disadvantaged Persons/Groups | People with disabilities, pregnant women, women with young children and elderly individuals | Low | Moderate |
| Component A: Generating 3D City Models and Updating Cadastral Data Subcomponent 2: Updating Cadastral Data | Project-Affected Parties | Immovable owner Citizens, Immovable owner Public Institutions and Organizations, Immovable owner Private Organizations, Municipalities | High | High |
| | Other Involved Parties | Financial Institutions (Banks), Private construction offices, Private architecture offices, Private survey engineering offices (LĪHKAB and Freelance Engineering Offices), Courts and Lawyers owing to project outputs, Investor Public Institutions and Organizations, Universities, Neighborhood Representatives | High | High |
| | Vulnerable/Disadvantaged Persons/Groups | People with disabilities, pregnant women, women with young children and elderly individuals | Moderate | Moderate |
| Component B: Real Estate Appraisal | Project-Affected Parties | Immovable owner Citizens, Public Institutions and Organizations, Immovable owner Private Organizations | Moderate | Moderate |
| | Other Involved Parties | Financial Institutions (Banks), Relevant Ministries and Institutions, Municipalities, CMB, GABIM, TDUB, NGOs and private sector representatives, Neighborhood Representatives | Moderate | Moderate |
| | Vulnerable/Disadvantaged Persons/Groups | People with disabilities, pregnant women, women with young children and elderly individuals | Moderate | Moderate |

| Components | Stakeholder Category | Stakeholders | Level of Interest | Level of Impact |
|--|---|---|-------------------|-----------------|
| Component C: Institutional Capacity Building and Project Management | Project-Affected Parties | Immovable owner Citizens, Public Institutions and Organizations, Immovable owner Private Organizations | Moderate | Moderate |
| | Other Involved Parties | Financial Institutions (Banks), Relevant Ministries and Institutions, Municipalities, CMB, GABIM, TDUB, NGOs and private sector representatives | Moderate | Moderate |
| | Vulnerable/Disadvantaged Persons/Groups | People with disabilities, pregnant women, women with young children and elderly individuals | Moderate | Moderate |

Meetings or other consultations shall be held at least 15 days prior to the meetings; and the location of the meetings shall be arranged taking into account the convenience and accessibility of all stakeholders and shall be clearly stated in the announcements to be made on the TKGM website, official letters, SMS, social media accounts, national/local television channels, etc.

4.1.1. An Overview of Stakeholder Engagement Programme

Some of the stakeholder engagement methods to be used during the implementation phase of the project, which aim to ensure that project stakeholders maintain their engagement with the project and increase the positive social impact of the project, are described below.

Owing to the current situation regarding Covid-19, it is not possible or feasible to organize large-scale face-to-face meetings. If this does not yield sufficient positive outcomes for the duration of the stakeholder meetings, TKGM shall prepare presentations about the project and share them with stakeholders via online meetings. During the online meetings, participants shall be given the opportunity to share their opinions/problems and ask questions. Following the meetings, presentations and any other material used during the meeting shall be shared on the official website of TKGM.

Depending on the situation regarding Covid-19, TKGM shall organize face-to-face meetings with stakeholders.

- **Official Meetings:** Official meetings shall consist of internal meetings to be held within TKGM and meetings with different governmental institutions, relevant NGOs, and organizations that will participate in the preparation and implementation phases of the project. Most of these meetings shall be conducted through digital platforms in line with preventive measures regarding Covid-19 .

- **Opening and Closing Meetings:** Multi-stakeholder meetings shall be organized at both the beginning and end of the project lifecycle to announce and disseminate project activities and results. If the Covid-19 related health risk is still ongoing at the time of the meetings, these meetings shall be held on digital platforms.

- **Disclosure Meetings:** Disclosure meetings shall be organized to share with stakeholders the ESF documents developed for the Project (SEP, Environmental and Social Commitment Plan (ESCP) and other relevant implementation documents). Most of these meetings shall be conducted via digital platforms, in line with the Covid-19 measures recommended by the government. Announcements of these meetings shall be made via emails, official websites of the relevant government authorities, social media, and newspapers. Feedback on shared documents shall be collected through official correspondence, online feedback forms and email to enhance the effectiveness of the digital meetings. TKGM documents shall be prepared specifically for the project and updated accordingly if there are any changes in the project or sub-projects.

- **Consultation Meetings:** Consultation meetings shall be organized to inform project stakeholders about the scope and timeline of sub-project activities. These meetings shall be organized in coordination with TKGM. Consultation meetings should include representatives of building management, Non-governmental Organizations (NGOs) for individuals with disabilities, charitable institutions, relevant provincial representations of ministries or any other stakeholders identified for the duration of the Project. In addition, the meetings shall be carried out to inform building residents, local population (including vulnerable individuals), representatives of the local administration (e.g. neighborhood representatives), etc. Minutes of

the meeting and a list of participants shall be recorded.

- **Digital Communication Tools:** TKGM's website, social media accounts, national/local television channels and radio stations shall be used to inform stakeholders about important developments related to the Project. Press releases shall also be shared with the press. These tools shall be used effectively in line with preventive measures regarding Covid-19 to reduce the need for face-to-face meetings.

- **Grievance Redress Mechanism:** According to the World Bank's ESS10 requirements, an appropriate grievance redress mechanism (GRM) shall be established and implemented for the Project. Chapter 6 of this document describes the mechanism in detail. In order for this mechanism to function properly and in a timely manner, a GRM contact person shall be assigned as part of the project team of TKGM to manage the whole process. This contact person shall also be responsible for reporting on the grievance redressing process of the project for monitoring purposes. He/she shall also be responsible for coordinating the grievance mechanism, ensuring its smooth functioning within the project and providing channels for project stakeholders to provide feedback and/or raise concerns regarding project activities.

All information on the project shall be made available on the websites of TKGM and WB and through TKGM social media accounts that will serve as a media tool/channel for communication with stakeholders. Within the scope of the project, brochures, booklets and/or posters to inform stakeholders about project activities shall be prepared.

The PIU shall be responsible for the sharing, delivery and announcement of project/sub-project documents, communication materials, and GRM.

Table 2. An Overview of Stakeholder Programme

| Project stage | Subject of Consultation /Message to be delivered | List of information to be disclosed | Method used | Target Stakeholder | Frequency | Responsible party |
|----------------------------|--|--|--|---|---|---|
| Preparation | <ul style="list-style-type: none"> • Informing stakeholders about the scope and the needs of the project <ul style="list-style-type: none"> • Consulting stakeholders on the following matters <ul style="list-style-type: none"> ○ project design, ○ environmental and social risks and impacts, ○ recommended mitigation measures, • GRMs • Requesting feedback | <ul style="list-style-type: none"> • Project concept, E&S principles and obligations • ESF documents (ESCP, SEP) | <ul style="list-style-type: none"> • Opening meeting • Public announcements • Non-technical project abstracts/presentations • Electronic publications • Social media • Printed media • Consultation meetings (online/face-to-face) • Digital communication tools • Grievance Redress Mechanism • Posters, brochures, leaflets, etc. • SMS | <ul style="list-style-type: none"> • Project-Affected Parties • Other Involved Parties • Disadvantaged/Vulnerable Groups/Individuals | <p>Before the start of component activities</p> <p>For the duration of the project</p> | <ul style="list-style-type: none"> • PCU • PIU |
| Implementation & Structure | <ul style="list-style-type: none"> • Informing stakeholders on the scope of the project and ongoing activities • ESF documents (ESMF, ESMPs, SEPs, etc.) • GRMs • Requesting feedback | <ul style="list-style-type: none"> • SEPs • GRM procedure • Regular updates on project development | <ul style="list-style-type: none"> • Public announcements • Non-technical project abstracts/presentations • Electronic publications • Social media • Printed media • Consultation meetings (online/face-to-face) • Digital communication tools • Grievance Redress Mechanism • Posters, brochures, leaflets, etc. • SMS | <ul style="list-style-type: none"> • Project-Affected Parties • Other Involved Parties • Disadvantaged/Vulnerable Groups/Individuals | <p>Before the start of the project implementation and as needed for the duration of the project</p> | <ul style="list-style-type: none"> • PCU • PIU • Provincial Organizations • Audit Advisor |
| Operation | <ul style="list-style-type: none"> • GRMs • Receiving feedback | <ul style="list-style-type: none"> • Project outputs • Grievance redressal | <ul style="list-style-type: none"> • Closing meeting • Consultation meetings • Informative meetings • Digital Communication Tools/Social media • Posters, brochures, leaflets, etc. • SMS | <ul style="list-style-type: none"> • Project-Affected Parties • Other Involved Parties • Disadvantaged/Vulnerable Groups and Individuals | <p>After the project activities are completed</p> | <ul style="list-style-type: none"> • PCU • PIU |

4.2. Proposed Strategy for integrating the opinions of vulnerable groups

Understanding whether the project disproportionately affects disadvantaged/vulnerable individuals or groups who often lack the means to voice their concerns or understand the impacts of a project is of particular importance. Awareness raising and stakeholder engagement activities should be implemented taking into account the specific constraints and cultural sensitivities of these groups and individuals to fully understand project activities and benefits. Engagement with vulnerable groups and individuals often requires special measures and assistance to ensure that their awareness of and contribution to the overall process is in balance with that of other stakeholders, with a focus on establishing their participation.

Within the scope of this Project, disadvantaged or vulnerable individuals and groups include individuals with disabilities, pregnant women and women with young children, and elderly individuals. They experience specific disadvantages in accessing public services and are likely to be directly affected by the subprojects.

Table 3 summarizes the identification of disadvantaged/vulnerable individuals/groups conducted for the Project, as well as the stakeholder engagement methods proposed for each disadvantaged/vulnerable individual/group.

Table 3. Identified Vulnerable Groups and Proposed Stakeholder Engagement Method

| Project Component | Disadvantaged/Vulnerable Groups and Individuals | Features/Needs | Preferred method for information sharing and consultation | Additional Funding Support |
|-------------------|--|---|---|--|
| All Components | Individuals with physical disabilities (mobility, hearing, eye impairment, etc.) | Funding for accessibility and lack of knowledge and education to assist individuals with special needs | Special educational needs such as audio devices, accessible platforms, etc. | Special education coordinators, sign language interpreters/translators |
| All Components | Pregnant women and women with young children | Accessibility, lack of knowledge | Methods of communication in accessible areas | Not necessary |
| All Components | Elderly individuals | Lack of knowledge and experience about accessibility, online tools, services and communication channels | Methods of communication in accessible areas | Not necessary |

In order to integrate the opinions of vulnerable groups,

- exchanges shall be made with regional organizations and NGOs representing the rights of individuals with disabilities,
- consultations shall also be carried out for pregnant women and women with young children, elderly individuals and individuals with disabilities in targeted provinces in easy access areas, as well as other disadvantaged/vulnerable groups that may be identified during the course of the project.
- information on the project shall be provided face-to-face or by any other appropriate method specific to vulnerable groups, which are specified or will be specified (Braille, sign language, etc.),
- consultations shall be carried out in areas that disadvantaged/vulnerable groups have access to, and any written or printed resource regarding the project to be distributed in project site known and accessible by the disadvantaged/vulnerable groups shall be

prepared using a culturally appropriate and easily understandable (not technical) language.

4.3. Implementation of SEP and Evaluating Stakeholder Feedback

The duration of the consultation shall be determined depending on the stakeholder category and the purpose/objective of the consultation. All stakeholders shall be given at least 15 days to submit their questions/feedback. During the consultation meetings, a

- Participant List containing the participant's name, location, contact details, and preferred mode of communication, etc. shall be kept. However, it shall be clearly stated that participants have the right not to share their names and that their contact details should remain anonymous,
- Any engagement shall be documented (date/location, summary of main points and feedback/questions raised and answers given by participants, summary/full version of information shared during the meeting, etc.) and
- A feedback form shall be handed out during the meeting and collected after the meeting so that participants can share their views/questions in case they do not want to express their views in public.

The continuous feedback and comments received from stakeholders during the project implementation shall be reviewed and, if deemed necessary, corrective actions shall be taken by the PIU's Social Expert to ensure smooth project implementation. Participants shall be informed about all the different communication channels created for the project (GRM, social media accounts, official web pages, e-mail addresses, official letters, etc.) at each consultation meeting.

In addition, the Project's GRM shall be used to receive any issues/feedback and grievances from internal and external stakeholders for the duration of the project . The project shall also include citizen engagement activities such as feedback on services received (or not received).

Evaluation of the Suggestions Received

Suggestions received from stakeholders on updating the stakeholder analysis/identification have been reflected in this SEP. Comments and feedback received from participants during the consultations shall be taken into account during the design and implementation of the sub-projects and shall be incorporated into the sub-project specific ESF tools to be prepared. The Project shall organize consultation meetings continuously for the duration of the project. For the duration of the project, the gender, ethnic and cultural diversity of the citizens shall be taken into account, especially for their participation in the project and for meetings/stakeholder engagement/consultation.

The following actions shall be taken prior to any engagement event;

- Determining the individual stakeholders to be involved,
- Determining the methods of information sharing (scope, organization, language and timing)
- Determining the location and timing of the engagement event (avoiding peak hours, which may be seasonal, and days/times that may cause ethnic and cultural problems)
- Determining and implementing decision-making mechanisms and
- Feedback mechanisms to be used to ensure stakeholder presence at the engagement event.

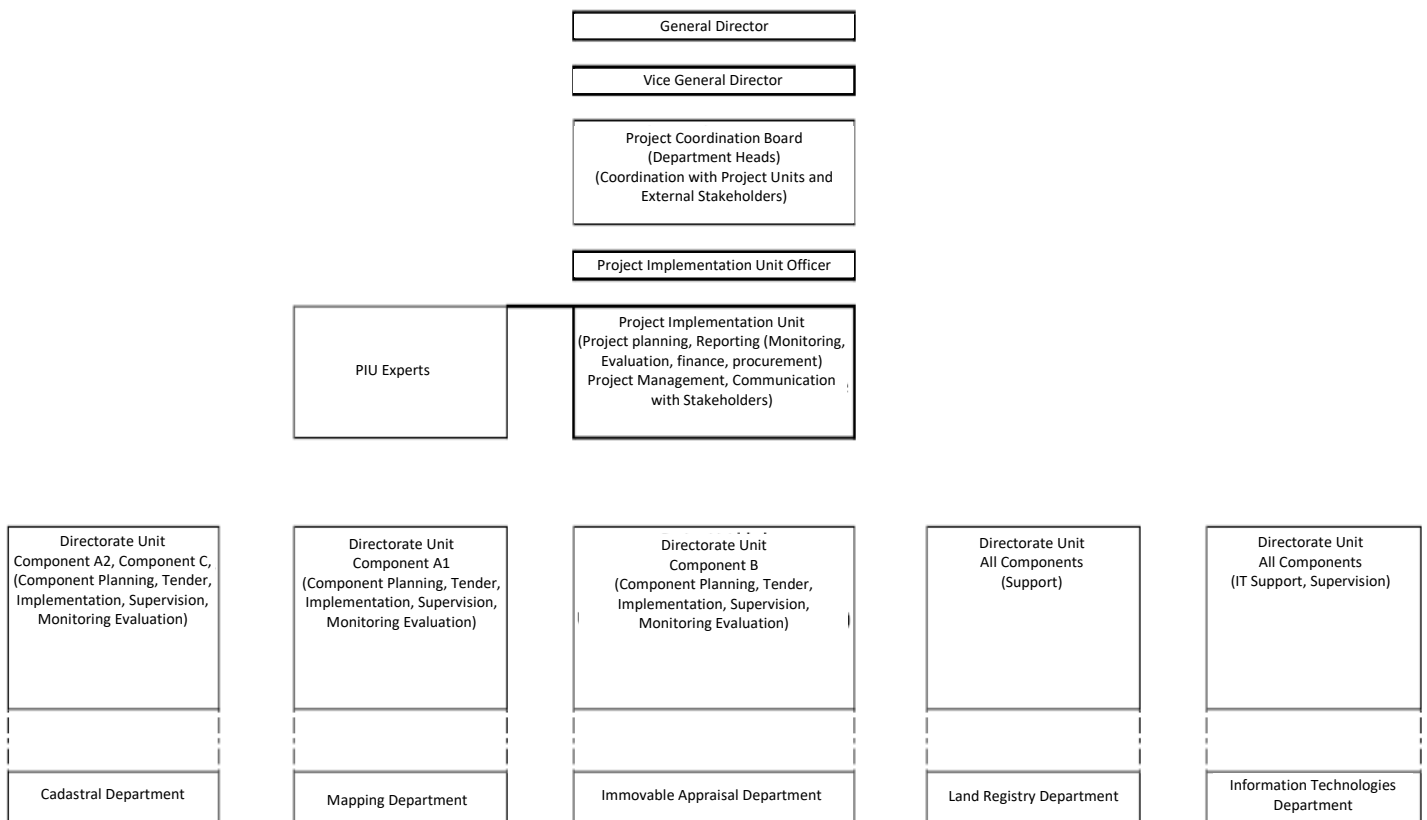
Finally, the project GRM shall be used to receive any issues/feedback and grievance from internal and external stakeholders for the duration of the project.

5. Institutional Arrangements

This chapter describes the organizational arrangements for the SEP aspects of full project management and implementation.

The existing PIU in TKGM shall be responsible for the overall implementation of the Project, including the implementation of the SEP. TKGM has qualified technical staff with experience in cadastral renewal, 3D city model production, 3D cadastre, valuation and digitalization. The management plan for the new project is as shown in Figure 1.

Figure 1. Main ESF responsibilities in PIU and PCU



The Environmental&Social specialist within the PIU shall be the responsible party for the implementation of Stakeholder Engagement Plans (SEP) and communication with communities throughout the project.

Stakeholder engagement activities at provincial level shall be managed by the provincial organization under the General Directorate of Land Registry and Cadastre and PIU. GRM requirements shall be determined in tender documents and contracts signed with contractors. The Environmental&Social Expert to be assigned under the Project shall also act as the contact person for Grievance Redress Mechanism. Communication with communities shall be maintained throughout the Project. The responsibilities and actors under the SEP are as in Table 4.

Table 4. Responsibilities of key actors during the implementation of SEP

| Responsible Party | Responsibilities |
|--|---|
| PIU | <ul style="list-style-type: none"> • Including all stakeholder engagement activities in overall environmental and social management systems • Establishing an internal system for conveying the progress and results of stakeholder engagement to senior management and employees • Accelerating, monitoring and tracking the establishment of the PIU for the proper implementation of the grievance redress mechanism and processes related to stakeholder engagement issues • Coordinating with the parties for the correct implementation of the processes related to the grievance redress mechanism and stakeholder engagement issues • Consultations on specific SEP activities |
| Environmental&Social Expert (PIU) | <ul style="list-style-type: none"> • Planning and implementation of SEP • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders • Directing stakeholder engagement activities with specific stakeholders • Organizing/managing Stakeholder Engagement/Consultation Meetings and related events concerning public information sharing • Supporting other PIU staff interacting with stakeholders • Coordinating liaison and reporting with the World Bank on the implementation of SEPs • Updating SEPs periodically and during major Project changes • Monitoring the progress of the Project • Ensuring safe delivery of all stated documents • Enhanced reporting on overall SEP activities and project progress • Implementation of social and environmental monitoring • Monitoring and reporting to the PIU and management whether the social and environmental issues identified in the relevant documents are implemented throughout the Project • Recording and following up grievances about the Project • Managing and coordinating the resolution process of grievances related to the Project • Filing grievance to raise relevant non-compliance issues or recurring issues related to stakeholder engagement and other Project activities |

6. Grievance Redress Mechanism

Grievance Mechanism (GRM) is a mechanism that provides channels for stakeholders to provide feedback and raise grievances about project activities and ensures that issues affecting the project are identified and resolved. By increasing transparency and accountability, GRM aims to reduce the risk of project impact on citizens/beneficiaries and acts as an important feedback and learning mechanism to improve project impact.

The project shall be managed by the PIU, similar to the Land Registry and Cadastre Modernization Project (TKMP) currently financed by the World Bank. The Project shall use the same communication channels and grievance mechanism as the TKMP, ensuring transparency and accountability and meeting the requirements of ESS-10 and WB ESF. GRM shall also serve the project staff, including the PIU.

6.1. GRM on Project Level

TKGM already has a call center that can be accessed both by phone and internet. This call center is used for all on-site issues dealt with by TKGM. TKGM has a website where all relevant information for the Project is shared for consultation and information. In addition, TKGM is able to collect project-specific concerns and grievances through this website and an e-mail address. Within the scope of the GRM, stakeholders shall be provided with the right to make suggestions and share grievances anonymously in accordance with the principle of confidentiality. Information on the communication channels of the Project is given below:

| | |
|-----------------------------|---|
| Website | https://www.tkgm.gov.tr/kadastro-db/ayap |
| Support Hotline | Alo 181 |
| E-mail | ayap@tkgm.gov.tr |
| Grievance Submission | https://www.tkgm.gov.tr/kadastro-db/ayap#sikayet |
| Mail address | Dikmen cad. No: 14 Bakanlıklar/Ankara |
| Tel | +90 312 413 60 00 |
| Fax | +90 312 413 61 13 |

The GRM shall be accessible to a wide range of project stakeholders who are likely to be directly or indirectly affected by the project. The GRM to be established in this project can be used to communicate grievances, feedback, questions, suggestions or satisfaction with the overall management and implementation of the project, as well as issues related to the sub-projects funded and supported by the project.

- Mismanagement, misuse of project loans or corrupt practices,
- Violation of project policies, guidelines or procedures, including child labor, health and safety of community/contract workers, sexual exploitation and abuse (SEA) and sexual harassment (SH), and environmental issues
- Grievances that may arise from stakeholders and other interested parties who are dissatisfied with the implementation of project activities or the actual implementation

- of the project; and
- Overall feedback, questions, suggestions, compliments.

In addition, TKGM has an objection/grievance mechanism regarding cadastral renovation activities. This grievance mechanism is carried out in accordance with the legislation and shall also be used within the scope of the project. The appeal mechanism for the TKMP is shown in Table 5.

Table 5. Objection Processes in Cadastrate Renovations

| Status of Objection in the Cadastral Renovation Phase | When to appeal? (Anticipated time) | Where/whom to appeal? |
|---|------------------------------------|--|
| From the beginning of the renovation works until the announcement | Whenever | Cadastral team If the problem cannot be solved by the Cadastral Team, the aggrieved should wait for the 1st IPO and then apply to the Cadastral Commission. |
| 1st announcement | Within the 15-day viewing period | Cadastral Commission |
| 2nd announcement | Within the 30-day viewing period | Local or nearest Cadastral Court |
| After the 2nd announcement is completed | Within 10 years after registration | Competent court of first instance |

All stakeholders shall also be able to submit their feedbacks/grievances to the Provincial and District Directorates of the General Directorate of Land Registry and Cadastre. The personnel in these directorates shall be informed and trained on GRM and shall guide stakeholders to submit their feedback/grievances through the right channels. For this reason, TKGM shall send posters, brochures, etc. to the Provincial and District Directorates of the General Directorate of Land Registry and Cadastre and these communication tools shall be displayed in public places in order to direct stakeholders (especially grant beneficiaries) to the GRM.

All grievances received from national or Project-level GRMs shall be registered in the same online system. The grievance recording system shall include, but not be limited to, the following information:

- The dates feedbacks were received/redressed
- Name and contact information of the aggrieved
- Description of the aggrieved (individual, PAP, NGO, institution, worker, etc.)
- The unit/institution responsible for the grievance and the date of application,
- Relevant project activity,
- Subject,
- Detailed description of feedback/grievance,
- Details on the measures taken for redress and
- Details on the feedback provided to the aggrieved.

The GRM shall also allow the submission of anonymous feedback, but the aggrieved shall be informed that the lack of full name/contact information may lead to delays or problems during the project evaluation and resolution. The aggrieved shall also be informed that their personal information (including name/surname, contact information) will not be shared or disclosed by third parties. The information received from the aggrieved shall only be used for the evaluation and resolution of the feedback/grievance received.

Some groups (such as the elderly, persons with disabilities, women, illiterate people, etc.) may have difficulty accessing or not be able to access GRM. The following measures shall be taken due to this:

- It should be possible to submit an anonymous grievance,
- The GRM should be advertised by displaying announcements in public spaces in settlements,
- Communication tools to be used for GRM and announcements should include more than one language when necessary, e.g. Arabic (or any other language) for seasonal agricultural workers, including migrants;
- The GRM should also be advertised on local radio and television channels (especially to inform the illiterate population).

A systematic and integrated GRM requires specific human resources;

- A responsible staff member shall be appointed to manage the grievance redress mechanism at the PIU full-time,
- The assigned responsible staff shall be trained on the rationale, implementation and monitoring before and during the establishment of the GRM,
- Other stakeholder institutions and organizations shall also be informed about this mechanism with an official letter.

6.2. Current GRMs

6.2.1. GRM on a National Level

The Law No. 3071 on the Right to Petition (1984) and Law No. 4982 on the Right to Information (2003) constitute the foundation of CİMER (Presidency Communications Center), which is the national-level grievance mechanism. Operating under the Communication Presidency under the Presidency of the Republic, CİMER serves as an official state tool for receiving requests, grievances, satisfaction and information from the public. Applicants may submit their requests (such as suggestions, grievances, satisfaction, requests for information or notifications) to the Presidency through the following communication channels.

| | |
|---------------------|--|
| Website | https://www.cimer.gov.tr https://giris.turkiye.gov.tr/ |
| Help line | Alo 150 |
| Mail address | TC Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara |
| Tel | +90 312 590 2000 |
| Fax | +90 312 473 6494 |

Through CİMER, applicants can submit their requests directly to the relevant authorities. If applicants do not know to which authority to submit their request, they can submit a request to CİMER, and the authorized CİMER personnel makes a preliminary assessment and directs the request to the relevant government institution.

CİMER only allows anonymous submissions if the request is a notification. An applicant can submit only one request per day. Requests submitted to CİMER are resolved within 30 days. If

applicants do not receive feedback within this period, they can resubmit their grievance to CİMER or forward it to the Ombudsman Institution (www.ombudsman.gov.tr). CİMER only allows applications in Turkish and has a detailed user manual in Turkish for its users ([available at https://cimer.gov.tr/50sorudacimer.pdf](https://cimer.gov.tr/50sorudacimer.pdf)).

6.2.2. GRM on Ministerial Level

In addition to CİMER, the Ministry of Environment, Urbanization and Climate Change, superior authority of TKGM, has its own communication center, which also addresses land registry and cadastre activities. Applicants can submit their requests (suggestions, grievances, satisfaction, information requests or notifications and questions related to environment, urban planning, land registry, cadastre and housing). Communication channels are provided below.

| | |
|---------------------|---|
| Website | https://181.csb.gov.tr/ www.turkiye.gov.tr |
| Help line | 181 |
| Mail address | MINISTRY OF ENVIRONMENT, URBANIZATION AND CLIMATE CHANGE Mustafa Kemal Mahallesi, Eskişehir Devlet Yolu (Dumlupınar Bulvarı) 9. km. (Next to Tepe Prime) No: 278 Çankaya/ANKARA |

6.3. Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

While the risk from project activities and in the context of Türkiye is low, the grievance redress mechanism for workers shall include addressing disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway shall be established and updated in line with the country's existing procedures. The GRM for project staff shall also be used to address SEA/SH related issues and shall have mechanisms in place for safe and ethical documentation of SEA/SH issues and confidential reporting. In addition, the GRM shall have processes in place to promptly inform both the PIU and the World Bank of any SEA/SH grievance with the consent of the aggrieved.

6.4. World Bank Grievance Redress System

Communities and individuals who believe they have been adversely affected by a World Bank (WB)-supported project can submit their grievances to existing project-level grievance mechanisms or to the World Bank's Grievance Redress Service (GRS). The GRS ensures that grievances received are promptly reviewed to address concerns about the project. Project-affected communities and persons may submit grievances to the independent Inspection Panel of WB, which determines whether damage has occurred or may occur as a result of the WB's failure to comply with its policies and procedures. Grievances may be submitted at any time after concerns have been brought directly to the attention of the World Bank and Bank Management has been given an opportunity to respond. For information on how to submit grievances to the World Bank's institutional Grievance Redress Service (GRS), please visit (<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>).

Project-affected communities or individuals can also submit their grievances to the World Bank's Independent Inspection Panel (IIP). This panel determines whether the individuals or communities submitting the grievance have suffered damages as a result of violations of one or more of the World Bank's performance criteria. The Panel can communicate its concerns about the grievances received directly to the World Bank. At this stage, the World Bank shall have the opportunity to respond to grievances.

7. Monitoring and Reporting

Stakeholder engagement activities shall be monitored periodically and reported on twice per year within project progress reports.

The documentation on stakeholder participation activities shall be kept within TKGM archives. Information on consultation activities shall be reported to the Bank within the scope of Project Progress Reports including the following elements.

- Numbers, type of consultation,
- Number of participants, type of participants
- Critical issues on the agenda discussed during the meetings,
- Number of grievances received (disaggregated data: gender, province, grievance category, status [closed, pending, resolved etc.])

8. Stakeholder Consultation Meeting

As part of the studies on the "Land Management Infrastructure Project for Green and Sustainable Development" to be implemented by the Government of the Republic of Turkey, General Directorate of Land Registry and Cadastre (TKGM) and financed by the World Bank (WB), a stakeholder consultation meeting was held as a video conference on Thursday, April 13, 2023 at 14:00 with the participation of stakeholders. 89 representatives attended the consultation meeting from 28 public institutions, universities and non-governmental organizations. The list of participants is given in Annex-1.

In the meeting, TKGM informed the participants about the Development Goal, Components and Stakeholder Engagement Plan (SEP) of the Project. Following the briefing, the participants emphasized the importance of completing the planned Project implementations in accordance with the objectives, and has requested that the SEP, which was prepared in accordance with the principles of the World Bank Environmental and Social Standards, be updated according to the experiences to be gained during the process.

In addition, it is stated that it is necessary to establish a timely and continuous dialogue with the participation of all stakeholders during the Project process. In this context, it was decided to repeat the Project consultation meetings in order to enable the stakeholders to express their opinions and concerns during the Project implementation process.



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sağlanmıştır veri Entegrasyonu

Caner Coşkun Prof. Dr. Ebru GÖLAK MİP TOPLANTI ODASI Prof. Dr. Tekin BÜŞAN Prof. Dr. Volkan YILDIRIM İBRAHİM ÇANKURT

Sürdürülebilirlik

Mekansal Adres Kayıt Sistemi Numarası 234 19

Mekansal Adres Kayıt Sistemi Numarası 230 18

Mimari Proje Üzerinde Bağımsız Bölüm Numarası 19

Mimari Proje Üzerinde Bağımsız Bölüm Numarası 18

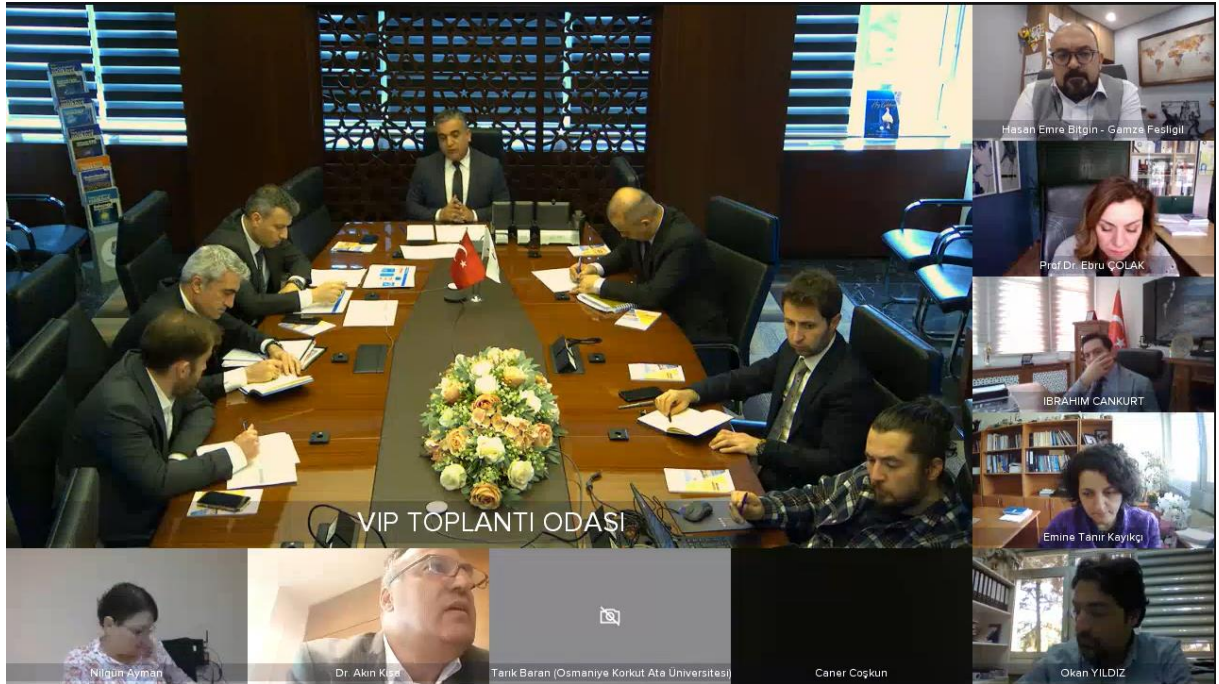
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Tapu ve Kadastro

- Binaların %15 - %30 luk kısmı Tapu Sicilinde tescilli.
- Bina ve Bağımsız Bölümler Düşey Mülkiyetin çok büyük kısmını oluşturuyor.
- Kat İrtifakı - Kat Mülkiyeti geçişleri tamamlanamayan binalar mevcut.
- Tescilsiz Binaların İmar Kanunu 32.Madde kapsamında sicil belirtmelerinin yapılması Vatandaşların taşınmazları ile ilgili daha fazla bilgiye ulaşmasını sağlayacaktır.
- Çok Boyutlu Kadastro için Düşey Mimari ana bileşendir.

Hüsnü Ayman Prof. Dr. Ebru GÖLAK MİP TOPLANTI ODASI Prof. Dr. Tekin BÜŞAN Caner Coşkun İBRAHİM ÇANKURT



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2. 2018. "Guidance Note for Borrowers: ESS10: Stakeholder Engagement and Information Disclosure"
3. <https://www.cimer.gov.tr/50sorudacimer.pdf>

ANNEX 1. Consultation Meeting

Participant List 14/03/2023, 14.00-16.00

| No | Name | Agency |
|----|------------------------|--|
| 1 | Seher AYDOĞ GÜRBÜZ | Turkish Statistical Institute |
| 2 | Yeşim GÜL | Turkish Statistical Institute |
| 3 | Levent ALPAR | Turkish Statistical Institute |
| 4 | Yusuf Ziya YILMAZ | Turkish Statistical Institute |
| 5 | Ercan ÇELİK | Turkish Statistical Institute |
| 6 | Elif Özlem PAKSOY | Turkish Statistical Institute |
| 7 | Mert Kubilay Uludağ | Turkish Statistical Institute |
| 8 | Tahir Baysal | Turkish Statistical Institute |
| 9 | Mustafa Aydoğan | Turkish Statistical Institute |
| 10 | Ahmet Osmanlı | Turkish Statistical Institute |
| 11 | Mehmet Can Akman | Turkish Statistical Institute |
| 12 | Bilal Kurban | Turkish Statistical Institute |
| 13 | Nilgün Ören ZEYREK | Zonguldak Karaelmas University |
| 14 | Nilgün AYMAN ÖZ | Çanakkale 18 Mart University |
| 15 | Özgün AKÇAY | Çanakkale 18 Mart University |
| 16 | Mustafa ULUKAVAK | Harran University |
| 17 | Halil İbrahim ŞENOL | Harran University |
| 18 | İlgin ÖZEMİR | Gaziantep Metropolitan Municipality |
| 19 | Beyza CİĞERLİ | Gaziantep Metropolitan Municipality |
| 20 | Meral Gizem Afat Kılıç | Gaziantep Metropolitan Municipality |
| 21 | İbrahim Deniz Keser | Gaziantep Metropolitan Municipality |
| 22 | Gamze Fesligil | Gaziantep Metropolitan Municipality |
| 23 | Hasan Emre Bitgin | Gaziantep Metropolitan Municipality |
| 24 | Recep Burak SAPAN | Sincan Municipality |
| 25 | Veli Karakaya | National Real Estate General Directorate |
| 26 | Nurdan BALABAN | National Real Estate General Directorate |
| 27 | Zeynel Abidin POLAT | İzmir Katip Çelebi University |
| 28 | Osman Sami KIRTILOĞLU | İzmir Katip Çelebi University |
| 29 | Tarık Baran | Osmaniye Korkut Ata University |

| | | |
|----|-----------------------|---|
| 30 | Doğuş Güler | İstanbul Technical University |
| 31 | Tayfun Atay | İstanbul Technical University |
| 32 | Esra Tunç Görmüş | İstanbul Technical University |
| 33 | Muhammed Oğuzhan Mete | İstanbul Technical University |
| 34 | Hakan Ufuk | Türkiye Valuation Experts Union |
| 35 | Caner COŞKUN | Türkiye Valuation Experts Union |
| 36 | İbrahim Halil Kalkan | Housing Development Administration of the Republic of Türkiye |
| 37 | Hakan DEMİRCİ | Housing Development Administration of the Republic of Türkiye |
| 38 | Mert Özdağ | The Union of Survey and Cadaster Engineers |
| 39 | Tahsin Yomralıoğlu | İstanbul Technical University |
| 40 | Hakan Güven | Directorate General of Geographic Information Systems |
| 41 | HAKAN GÜNGÖR | Directorate General of Geographic Information Systems |
| 42 | Hilal Yılmaz | Directorate General of Geographic Information Systems |
| 43 | Eda Soylu | Directorate General of Geographic Information Systems |
| 44 | Harun Badem | Directorate General of Geographic Information Systems |
| 45 | Yasin Tutak | Directorate General of Geographic Information Systems |
| 46 | BUKET GÜLŞEN | Directorate General of Geographic Information Systems |
| 47 | HAKAN GÜVEN | Directorate General of Geographic Information Systems |
| 48 | EDA SOYLU SENGÖR | Directorate General of Geographic Information Systems |
| 49 | YASEMİN KOÇ | Directorate General of Geographic Information Systems |
| 50 | NURULLAH GÜLTEKİN | Directorate General of Geographic Information Systems |
| 51 | Melih Altinel | Directorate General of Geographic Information Systems |
| 52 | Bestami Kara | Directorate General of Geographic Information Systems |
| 53 | Yasemin Kılıç | Directorate General of Geographic Information Systems |
| 54 | Tekin Susam | Tokat Gaziosmanpaşa University |
| 56 | Halil Kalkan | Tokat Gaziosmanpaşa University |
| 57 | Murat Yakar | Mersin University |
| 58 | Simge Çetinkaya | |
| 59 | Ahmet Osmanlı | Turkish Statistical Institute |
| 60 | Ceyhan Yücel | Erciyes University |
| 61 | Nihat Alaattinoğlu | |
| 62 | Mehtap Güzel | |

| | | |
|----|----------------------------|--|
| 63 | Caner ořkun | |
| 64 | Tayfun ay | Konya Technical University |
| 65 | Seluk Sayın | Konya Technical University |
| 66 | Melih Kurnalı | Konya Technical University |
| 67 | Muzaffer Ali Arat | Konya Technical University |
| 68 | Fevzi KARSLI | Karadeniz Technical University |
| 69 | Faruk YILDIRIM | Karadeniz Technical University |
| 70 | Glten KARA | Karadeniz Technical University |
| 71 | Deniztan ULUTAŐ KARAKOL | Karadeniz Technical University |
| 72 | Mustafa DİHKAN | Karadeniz Technical University |
| 73 | Bayram Uzun | Karadeniz Technical University |
| 74 | Yakup Emre oruhlu | Karadeniz Technical University |
| 75 | Ebru olak | Karadeniz Technical University |
| 76 | Okan Yıldız | Karadeniz Technical University |
| 77 | Volkan Yıldırım | Karadeniz Technical University |
| 78 | Deniz elik | Ministry of Environment, Urbanization and Climate Change |
| 79 | Seil meroęlu | Ministry of Environment, Urbanization and Climate Change |
| 80 | Sleyman SavaŐ DURDURAN | Necmettin Erbakan University |
| 81 | Mehtap KUMDAKCI CAN | General Directorate of Construction |
| 82 | Faik Ahmet SESLİ | Ondokuz Mayıs University |
| 83 | Volkan AęDAŐ | Yıldız Technical University |
| 84 | Mehtap GL | General Directorate of State Hydraulic Works |
| 85 | Berat ezik | General Directorate of State Hydraulic Works |
| 86 | Aynur Talaka Akın | General Directorate of State Hydraulic Works |
| 87 | Arif aędaŐ AYDINOęLU | Gebze Technical University |
| 88 | Mehmet Arif TAŐDEMİR | Gaziantep Őahinbey Municipality |
| 89 | Group Participation | Survey Engineers and Businessmen Union |

ANNEX 2. Grievance Register Form

| GRIEVANCE REGISTER FORM | | | |
|--|--|-----------------|--|
| Reference No <i>(to be filled in by the institution)</i> | | | |
| <p>Personal information</p> <p><i>Although it is not mandatory to provide name and address, it should be noted that some problems may arise due to lack of information during the feedback process regarding the grievance.</i></p> <p><i>Your personal information shall be used to determine whether there are special circumstances related to your grievance and shall be stored and processed in accordance with the Law No. 6698 on the Protection of Personal Data. You may choose whether or not to partially fill.</i></p> | | | |
| Name and Surname | | | |
| Province | | Vicinity | |
| Neighborhood/Village | | Locality | |
| Preferred mode of communication , (Specify your contact information: mail address, e-mail address, phone number, etc. when you want to be informed about the solution process, the actions to be taken) | | | |
| Grievance | | | |
| | | | |
| Your proposed solution (if any) | | | |
| | | | |
| Signature | | Date | |

ANNEX 3. Grievance Closeout Form

| GRIEVANCE CLOSEOUT FORM | |
|---|--|
| Grievance Closure No: | |
| Grievance Reference No: | |
| Define the immediate action required: | |
| Define the required long-term action (if necessary): | |
| Is Compensation Necessary? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| RESOLUTION PROCESS AND DECISION REVIEW | |
| Stages of Solution Action | Final Deadline and Responsible Organizations |
| 1. | |
| 2. | |
| 3. | |
| 4. | |
| 5. | |

COMPENSATION AND FINAL STEPS

This section is to be completed and signed by the aggrieved after they have received the compensation fees and/or their grievance has been resolved.

| | |
|------|-----------|
| Name | Signature |
| Date | |
| | |

The aggrieved:

| | |
|------|-----------|
| Name | Signature |
| Date | |
| | |