



FIRAT

FIRAT PLASTIC RUBBER INDUSTRY AND TRADE INC.

FIRAT Plastic Roof SPP Investment Project

Stakeholder Engagement Plan

(Plan No: FRT-PLN-SOC-SEP-001)

November 2022



Project Information

Project	Details
Name	FIRAT Plastic Roof SPP Investment Project Stakeholder Engagement Plan (SEP)
Submitted to	Development and Investment Bank of Turkey
Issued to	Firat Plastic Rubber Industry and Trade Inc. / Fırat Plastik Kauçuk San. ve Tic. A.Ş. (FIRAT)
Prepared by	MGS Project Consultancy Engineering Trade Limited Co. / MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. (MGS)

Record of Issue

Company	Client Contact	Version	Date Issued	Method of Delivery
Development and Investment Bank of Turkey	Erhan ÇALIŞKAN	Rev01	25.11.2022	e-mail: PDF
Firat Plastic Rubber Industry and Trade Inc. (FIRAT)	Mutlu SUNER	Rev01	25.11.2022	e-mail: PDF

Prepared by

MGS Project Consultancy Engineering Trade Ltd. Co. (MGS)

Pelin Deniz YOĞURTÇU	Project Manager / International Projects Coordinator
İsmail ÇETİNASLAN	H&S Expert / Environmental Engineer
Ekin EKİCİ GÜL	Sociologist
Furkan AKSU	Sociologist
Kübra ÖZSOY	Project Engineer / Environmental Engineer
Erkan AKSOY	Project Engineer / Environmental Engineer
Yavuz TORUN	Project Engineer / Environmental Engineer
Hilal AYDIN	Project Engineer / Environmental Engineer
Ebruhan HÜNERLİ	Project Engineer / Environmental Engineer



Table of Contents

- List of Tables ii**
- List of Figures..... ii**
- List of Abbreviations..... i**
- 1 INTRODUCTION.....2**
 - 1.1 Background2
 - 1.1.1 Project Location and Area of Influence4
 - 1.2 Purpose.....5
 - 1.3 Scope.....6
 - 1.4 Definitions7
- 2 KEY ROLES AND RESPONSIBILITIES8**
- 3 PROJECT STANDARDS10**
 - 3.1 Applicable National Standards.....10
 - 3.2 Environmental and Social Policy of TKYB13
 - 3.3 Applicable International Standards, Legislations and Guidelines14
 - 3.3.1 IFC Performance Standards.....15
 - 3.3.2 AFD Requirements.....16
 - 3.4 Project Standards.....16
- 4 STAKEHOLDER ENGAGEMENT ACTIVITIES16**
 - 4.1 Early Engagement.....16
 - 4.2 Stakeholder Identification34
 - 4.3 Stakeholder Engagement Program35
 - 4.4 Tools & Methods for Information Disclosure39
 - 4.4.1 Internal / Website39
 - 4.4.2 Information Sheets40
 - 4.4.3 Responding to Stakeholders40
 - 4.4.4 Disclosure Activities41
- 5 MANAGEMENT OF GRIEVANCES42**
 - 5.1 Grievance and Feedback Procedure42
 - 5.1.1 Collection, Registration and Evaluation of Grievances42
 - 5.1.2 Feedback to the Stakeholders.....43
 - 5.2 Grievance Mechanism Communication44
 - 5.3 Contact Details.....44
 - 5.4 Customer Grievances.....44

5.5	Other Grievance Redress Mechanisms	44
6	MONITORING	46
6.1	Review and Revision of this Plan	46
6.2	Key Performance Indicators (KPIs).....	46
6.3	Key Monitoring Activities	47
7	TRAININGS	48
7.1	Induction Training.....	48
7.2	Job Specific and Other Training Requirements	49
8	AUDITING AND REPORTING	49
8.1	Internal and External Auditing.....	49
8.2	Record Keeping and Reporting	49
	APPENDICES	50
	Appendix A: Complaint Register Form	51
	Appendix B: Consultation Form.....	52
	Appendix C: EIA Exemption Letters of Firat Plastic.....	53
	Appendix D: Grievance Database	58
	Appendix E: Grievance Closure Form	59

List of Tables

Table 1-1.	Information on Closest Settlements within the Aol	4
Table 2-1.	Key Roles and Responsibilities.....	8
Table 4-1.	Summary of the Early Engagement Activities	18
Table 4-2.	Stakeholder Groups.....	34
Table 4-3.	Stakeholder Engagement Program.....	36
Table 5-1.	Contact Details of the Project	44
Table 6-1.	Key Performance Indicators (KPIs).....	46
Table 6-2.	Key Monitoring Activities.....	47

List of Figures

Figure 1.1	General Layout plan of FIRAT	3
Figure 1.2	Proposed Roof SPP Project	4
Figure 1.3.	Location of the Project area.....	5
Figure 1.4.	Area of Influence (Aol).....	5
Figure 3.1.	Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement	15
Figure 4.1.	Contact form of Firat Plastic	39
Figure 4.2.	Contact Information of Firat Plastic.....	40

List of Abbreviations

AFD	Agence Française De Développement
Aoi	Area of Influence
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESMS	Environmental and Social Management System
ESF	Environmental and Social Framework
ESP	Environmental and Social Policy
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
ICP	Informed Consultation Participation
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
Project Company	Firat Plastic Rubber Industry and Trade Inc.
PAP	Project Affected People
PS	Performance Standard
SAS	Social Affairs Staff
SEP	Stakeholder Engagement Plan
The Project	FIRAT Plastic Roof SPP Investment Project
TKYB	Development and Investment Bank of Turkey

1 INTRODUCTION

This Stakeholder Engagement Plan (“SEP”) is prepared for “FIRAT Plastic Roof SPP Investment Project” (“Project”) for the roofs of 13 buildings within Fırat Plastic.

This SEP, which identifies target groups and the specific engagement activities required for each group, has been conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project as per the national legislation, Development and Investment Bank of Turkey (“TKYB”) Environmental and Social Policy, International Finance Corporation (“IFC”) Performance Standards (PSs) and Agence Française de Development (“AFD”) Environmental and Social Framework (“ESFs”). The reference number of this Plan is FRT-PLN-SOC-SEP-001.

This is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

1.1 Background

Fırat Plastic Rubber Industry and Trade Inc. (hereinafter called as FIRAT) was established in 1972 in Büyükçekmece District of Istanbul Province. Production has been carried out in Istanbul Büyükçekmece complex since 1991. Büyükçekmece complex is located on an area of 574,000 m², in a closed area of 274,000 m².

FIRAT produces plastic-based products for various sectors such as construction, agriculture, medical and white goods. PVC Window and Door Profiles, PVC Rain Gutters, PVC Wastewater Pipes and fittings, PVC Deep Well Pipes, PVC Hose Groups, Rubber and PE Based Hoses, PPRC Indoor Installation Pipes and fittings, PP Composite Pipe and fittings, HDPE Pipe and its fittings, LDPE Pipe and fittings, Electrofusion fittings, PE fittings, PE-80 Natural Gas Pipes, PVC and PE Drainage Pipes, Double Walled Cable Casing Pipes, EPDM Gasket Production, TPE Gasket Production, Metal Injection Production (hinge and thousands of FIRAT products such as window fasteners), PEX Mobile System and Floor Heating Pipes, Pex-Alpex Pipes, Geothermal Hot Water Pipe and PP PE Sheet are used in many parts of Turkey and the world. FIRAT products are available in more than 90 countries.

FIRAT has a product range of more than 5000. FIRAT products are produced as integrated systems so that the buyers can get the highest benefit and satisfaction from these products. FIRAT is the only company in the world plastics industry that produces all of the elements that make up PVC Window and Door Systems, excluding glass and screws. Since PVC Window and Door systems can be 100% compatible with each other, it is possible to produce them under the same roof; Fırat manufactures all of the PVC Profile, EPDM Gasket, TPE Gasket,

Support Sheet and Metal Accessories integratedly in its own facilities. Firat products, for which all quality control tests have been carried out, are offered to the market with the Firat Quality Assurance Approval. FIRAT also serves the PVC Window industry with the brands Firatpen, Winhouse and Gedizpen.

Within the scope of the project, it is planned to produce electricity by placing solar panels on the roofs of 13 buildings, including buildings larger than 6000 m² with suitable roofs and 3 masterbatch buildings. With the project to be made, it is planned to produce 15,525,215.57 kWh of electricity annually with a power of 12,000 kWp. The general layout plan of FIRAT is given in Figure 1.1, and the buildings where solar panels are planned to be placed are given in Figure 1.2

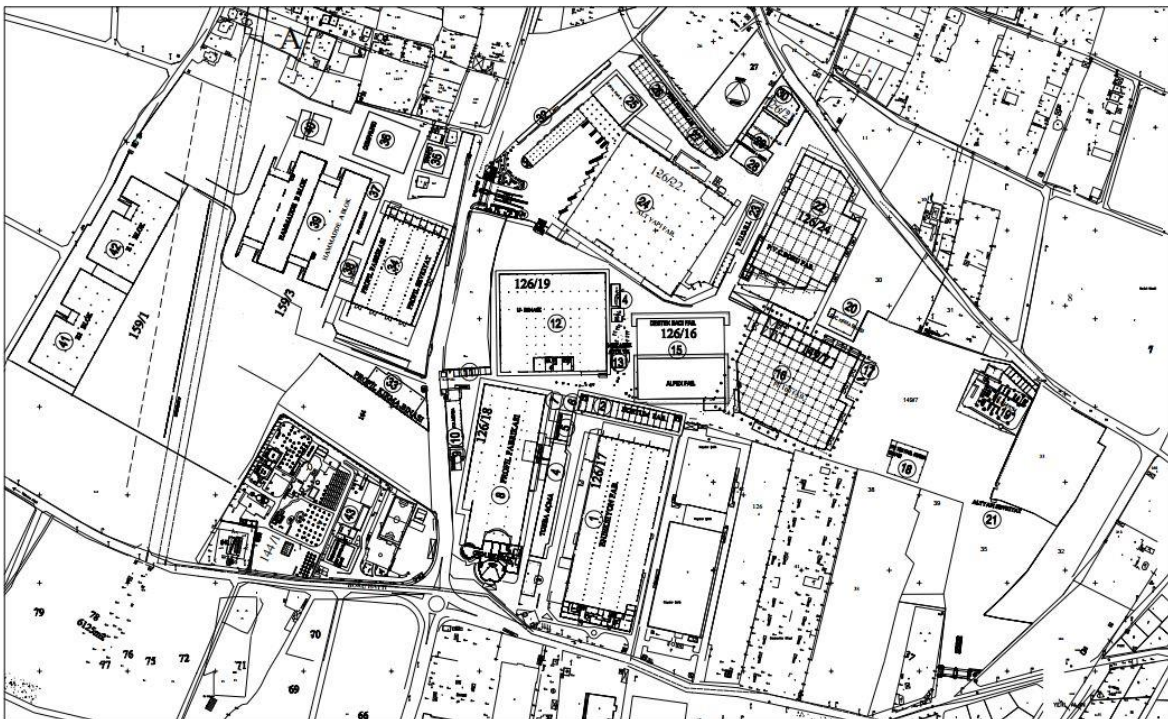


Figure 1.1 General Layout plan of FIRAT



Figure 1.2 Proposed Roof SPP Project

1.1.1 Project Location and Area of Influence

The location of the Project Area is in administrative border of Büyükçekmece District of İstanbul. There are industrial facilities in the region that carry out different activities from different sectors. Firat Plastic's facilities cover a large area in its region. The Project area is considered as an area of influence (AoI) with a radius of 1 km. Area of Influence; Access roads will be evaluated taking into account environmental and social impacts, including existing buildings and infrastructures. Figure 1.3 and Figure 1.4 below show the locations and impact areas of the Project Area.

Table 1-1. Information on Closest Settlements within the AoI

Settlement District and Province	Distance to the Project Area (m)	Direction	Population		
			Total	Male	Female
Türkoba Neighborhood Büyükçekmece / İstanbul	<1km	Northwest	14.755	7.499	7.256
Güzelce Neighborhood Büyükçekmece / İstanbul	<1km	Southwest	8.447	4.264	4.183
Muratçeşme Neighborhood Büyükçekmece / İstanbul	<1km	Southeast	18.183	9.209	8.974
Hürriyet Neighborhood Büyükçekmece / İstanbul	<1km	Northeast	22.263	11.419	10.844



Figure 1.3. Location of the Project area

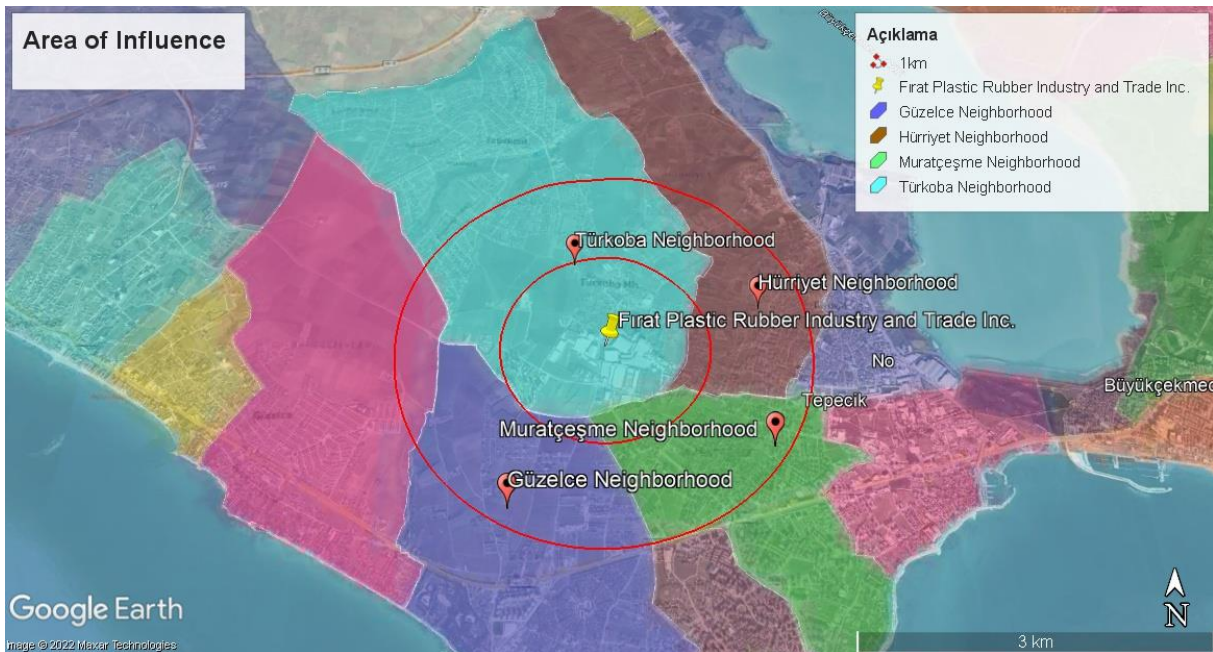


Figure 1.4. Area of Influence (AoI)

1.2 Purpose

The goal of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to create an effective communication and improve engagement with the stakeholders. The purpose of this SEP is to:

- identify stakeholders and their interest to the Project,
- set out applicable management interfaces,

- define roles and responsibilities,
- outline the applicable project standards relevant to this Plan,
- define Project commitments, operational procedures and guidance relevant to this Plan,
- define monitoring and reporting procedures, including the key performance indicators (KPIs) of stakeholder engagement activities,
- define training requirements,
- set out references for supporting materials and information,
- outline communication tools.

This Plan also aims to create long-term relations between the Project and local communities based on mutual trust and transparency. By implementation of this SEP, stakeholders will be able to access to the information about the Project, its investments, installation works and operation activities in a timely manner. Data will be fully understandable for the targeted groups and access to consultation locations is available for all.

This SEP aims to ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and, to ensure that all relevant parties have been engaged and no group has been excluded. In this content, this SEP aims to be a useful tool for management of communication between the Project and its stakeholders.

Another goal of this SEP is to describe the most effective methods by:

- keeping the management of installation and operation fully informed on the issues related to external affairs and concerns,
- establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
- understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.

1.3 Scope

This Stakeholder Engagement Plan covers all Project activities including associated facilities and contractors' activities during the operational phase of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan.

This Stakeholder Engagement Plan consists of a formal management system to establish and maintain a reliable communication with stakeholders of the Project during the lifetime of the Project. It should be updated periodically as stakeholder communication needs change.

This Plan is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:

- Grievance Mechanism Procedure (Internal and External) (FRT-PRC-SOC-GMP-001),
- Gender Equivalent Action Plan (FRT-PLN-SOC-GEAP-003),
- Emergency Response Action Plan (FRT-PLN-HSE-ERP-002),
- Occupational Health and Safety Management Plan (FRT-PLN-HSE-OHSMP-003),
- Contractor Management Plan (FRT-PLN-SOC-CMP-002)
- Waste Management Plan (FRT-PLN-HSE-WMP-001),
- Carbon Footprint Report.

1.4 Definitions

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally Appropriate	A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors
Project Affected People (PAP)	Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
Vulnerable People	People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section. Key roles and responsibilities for the implementation of this Plan are outlined in Table 2-1.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> • Determining the policies and targets regarding the social communication and stakeholder engagement, • Approval of this Plan, • Approval of the social budget of the Project determined and submitted by HR Unit.
Technical Deputy General Manager	<ul style="list-style-type: none"> • Conveying the issues related to the factory management to the general manager, • Providing support to the factory manager on related issues.
Factory Manager	<ul style="list-style-type: none"> • Approval of and resources required for implementation determined and submitted by Human Resources (HR) Unit Manager, , • Ensuring this plan is implemented properly during the lifetime of the Project, • Conveying the developments regarding the implementation of this Plan to the Technical Deputy General Manager.
Human Resources (HR) Unit Manager	<ul style="list-style-type: none"> • Making the final decision concerning internal and external grievances (if needed) in terms social issues in the light of the assessments of the Social Affairs Staff (SAS), • Having overall responsibility for the implementation of this SEP by fulfilling the Project requirements together with SAS, • Determining the social budget of the Project and reporting it to the Top Management.
Social Affairs Staff (SAS)	<ul style="list-style-type: none"> • Implementing SEP and GMP, • Ensuring the Project's compliance with the national and international standards and requirements set out in this Plan, • Coordinating the relevant parties for the proper implementation of this Plan, • Reporting to the HR Unit Manager about the system performance, • Ensuring national and international legislation/guidelines which are applicable to the Project activities are identified and tracked,

Roles	Responsibilities
	<ul style="list-style-type: none"> • Recording all formal and informal engagement activities with local communities in DCC, • Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports, • Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement reports, • Forming relationships with the Project stakeholders, • Organizing stakeholder meetings to collect the grievances, concerns and/or requests actively as required, • Providing regular reporting back to the community on the management related to community grievances, • Determining and providing the necessary training materials for all employees, • Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.), • Searching the causes of the grievances and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities, • Monitoring all complaints and ensuring that all complaints are resolved and closed properly in a timely manner, • Following the results of complaint and reporting on a weekly, monthly and annual basis, • Recording and reporting general and local employment rates and complaints which are received verbally or observed visually, • Fills out the “Complaint Register Form” & “Consultation Form” (see <i>Appendices A and B</i>), • Giving the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 days that the grievance solution process has started and after the grievance closed).
<p style="text-align: center;">Quality Manager</p>	<ul style="list-style-type: none"> • Making the final decision concerning internal and external grievances (if needed) in terms of OHS and environmental issues in the light of the assessments of the Social Affairs Staff (SAS), HSE Manager and HSE Staff, • Having overall responsibility for the implementation of this SEP by fulfilling the Project requirements together with HR Unit, • Determining necessary resources for proper implementation of this SEP and reporting them to the Factory Manager.
<p>Health, Safety and Environment (HSE) Manager</p>	<ul style="list-style-type: none"> • Determining the environmental impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Ensuring that all provisions in the Contractor engagements regarding environmental requirements as per the Project Standards during the

Roles	Responsibilities
	<p>operation phase and auditing the performance of the Contractors on those requirements,</p> <ul style="list-style-type: none"> Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding environmental issues.
Health, Safety and Environment (HSE) Staff	<ul style="list-style-type: none"> Determining the OHS and environmental hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, Ensuring that all provisions in the Contractor engagements regarding HS and environmental requirements as per the Project Standards during the operation phase and auditing the performance of the Contractors on those requirements, Supporting SAS to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding health and safety issues.
Contractor Representatives / Project Responsible	<ul style="list-style-type: none"> Ensuring that all requirements in this SEP are complied with.
Contractors / Subcontractors / Suppliers & Employees	<ul style="list-style-type: none"> Not making any commitment in their interactions with the stakeholders beyond their competence, Complying with the requirements of this SEP and other relevant Management System documentation of the Project.

3 PROJECT STANDARDS

This SEP is prepared based on national and international requirements and standards. During the lifetime of the Project, “Project Standards” will be followed which consist of:

- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- Environmental and Social Policy of TKYB,
- AFD Environmental and Social Framework,
- other applicable international standards and guidelines,
- interim advice on “Safe Stakeholder Engagement in the context of COVID-19” by IFC.

3.1 Applicable National Standards

The Constitution of The Republic of Turkey

The main document of the national requirements and standards is “The Constitution of The Republic of Turkey” which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

I. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

III. Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

IV. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

V. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labor Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.

The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development.

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are

workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 29 July 2022, no 31907) is defined which includes a limited public disclosure process. The purpose of the environment law is to protect and improve the environment which is the common asset of all citizens; make better use of, and preserve land and natural resources in rural and urban areas; prevent water, land and air pollution; by preserving the country's vegetative and livestock assets and natural and historical richness, organize all arrangements and precautions for improving and securing health, civilization and life conditions of present and future generations in conformity with economic and social development objectives, and based on certain legal and technical principles.

When it comes to the public consultation requirements, it is mandatory to hold at least one public participation meeting for the Projects which is under the Annex-I of the EIA Regulation, while no requirement is needed for the projects under the Annex-II of the same regulation.

Similarly, according to the EIA Regulation, which entered into force with the Official Gazette dated 29.07.2022 and numbered 31907, a 'Stakeholder Engagement Plan' should be added to the EIA Application File. Whereas, SEP is not required to be added to the 'Project Introduction Files', which are prepared for the projects under the Annex-II list of the EIA Regulation.

3.2 Environmental and Social Policy of TKYB

Within this scope, the TKYB closely follows and implements national legislation, laws and regulations to manage its environmental and social impact while fulfilling its legal obligations. It consistently follows national and international developments within the industry and best practices in environmental and social issues. The Bank supports and joins all kinds of environmentally friendly activities and volunteering efforts particularly concerning education and the environment, along with all public and civil society organizations as well as other shareholders who enhance social prosperity and development.

While reducing its negative impact stemming from operational activities, the Bank supports positive environmental movements with its efforts to increase energy and resource efficiency. To this end, the Bank regularly monitors energy, water and paper use, air emissions, waste generation and greenhouse gas emissions and aims to improve its reduction performance.

The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,
- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system, Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO 14001 Environmental Management System Standards.

3.3 Applicable International Standards, Legislations and Guidelines

International standards to be applicable by the Project is AFD ESFs. Basic objectives of the ESFs are as follows:

- Operates in a transparent and accountable manner, requiring that relevant information, including related to E&S issues, is made available to the affected and potentially affected communities at projects level, and, as well to external stakeholders of AFD in general,
- To publish information of projects financed by AFD on the AFD "Open Data" Internet portal, on the "International Aid Transparency Initiative" website, and on the open data platform of the French public data,
- To ensure efficiency, effectiveness and sustainability of projects, AFD involves and develops partnership and/or consultation with civil society at all stages of project life cycle, including project design, implementation, and evaluation,
- AFD ensures through contractual commitments and technical assistance that the project owner consults and engages all project stakeholders and local communities in particular. Interests and concerns of stakeholders are also taken into account in project evaluation,
- To ensure the effective engagement of communities, vulnerable populations, groups and individuals, indigenous peoples, local communities and other marginalized groups of people and individuals that are affected or potentially affected by Program activities.

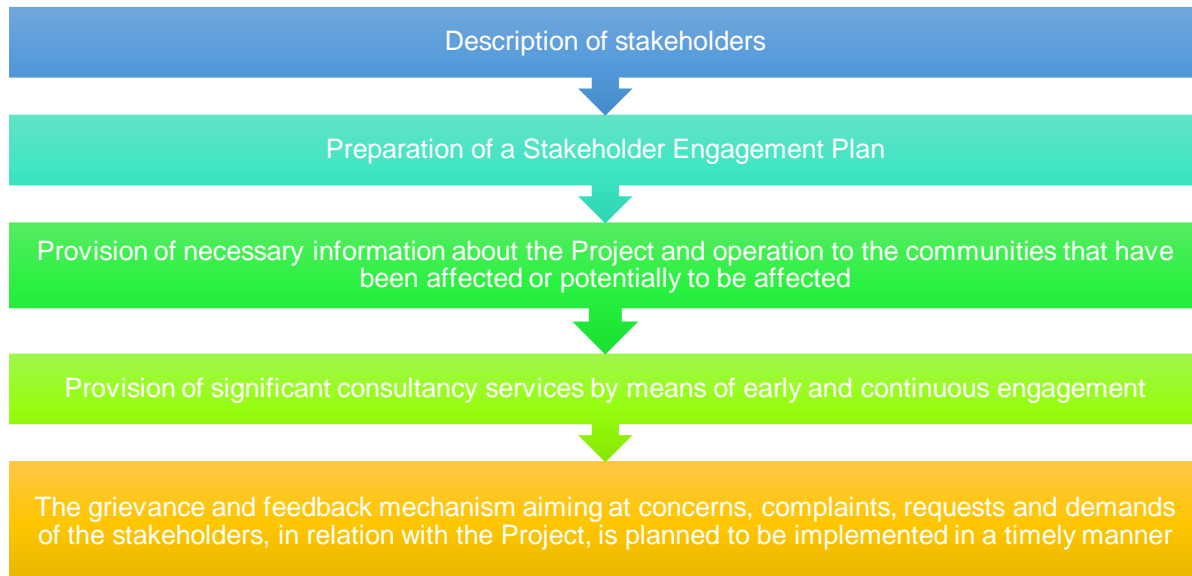


Figure 3.1. Main Requirements of International Standards and Guidelines regarding Stakeholder Engagement

3.3.1 IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

- An Environmental and Social Management System (ESMS) should be prepared and implemented, and the element of stakeholder engagement should be included,
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.
- When applicable this SEP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature, and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation is to be conducted.

IFC has defined “Key Concepts and Principles of Stakeholder Engagement” in its A Good Practice Handbook. The building blocks of stakeholder engagement are listed below:

- Stakeholder Identification and Analysis

- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders

3.3.2 AFD Requirements

In Environmental and Social Framework set out by AFD describe the stakeholder engagement as follows:

“Stakeholder consultation has been carried out during Program appraisal phase at country level. Stakeholders to be involved in the Program at country level are very country-specific, and cover governmental and non-governmental organizations, representatives of the private sector and civil society and financial institutions. At Subprojects level, stakeholders concerned by a Subproject are more likely to be local communities, local individuals, and their representatives. During stakeholder consultation, it has been noted that stakeholders are required to be kept in the loop of Program implementation and consulted as much as necessary. The approach to stakeholder engagement for the Program has been designed to answer such expectation. In the framework of the Program and in line with GCF approach to stakeholder engagement, AFD requires LFPs to ensure the effective engagement of communities, vulnerable populations, groups and individuals, indigenous peoples, local communities and other marginalized groups of people and individuals that are affected or potentially affected by Program activities. Information related to E&S issues on activities financed in the framework of the Program is made available in compliance with GCF Information Disclosure Policy and shall be disclosed on AFD’s website.”

3.4 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

4 STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Early Engagement

The Project located in Büyükçekmece İstanbul, has been evaluated in accordance with the Annex-1 and Annex-2 lists within the national EIA legislation. As a result of the evaluation, the facility was found out of the scope of both lists and the "Out of Scope" letter was given (see Appendix C) was given by Former İstanbul Provincial Directorate of Environment and Forestry


(İstanbul Provincial Directorate of Environment, Urbanization and Climate Change) in 2002. In addition in 2012, due to the power transmission line project, it was evaluated by the same regulation and exempted from the EIA requirements with the "Out of Scope" letter dated 09.03.2012. Then, as a result of the applications made in 2013, 2014 and 2015, an "Out of Scope" letter was received in these years. Out of Scope letters are given in the Appendix C: EIA Exemption Letters of Fırat Plastic. These documents have been taken according to the Turkish EIA Regulation, which has been repealed. The Roof SPP Project, which is within the scope of the loan, is also exempted from the national EIA, but no application has been obtained for the Project yet. For this reason, stakeholder participation meetings of the previous period were not held.

In the scope of the Environmental and Social studies performed by MGS, interviews and/or face-to-face meetings have been performed with employees of the project and Mukhtars of nearest settlements to the project area on 15th of November 2022. The aim of those meetings was to obtain information about the Project activities and stakeholder engagements conducted up to now and to obtain information on the socio-economic structure of the region through specifically prepared surveys.


Moreover, a call interview held with the mukhtar of Muratçeşme Neighborhood for ensuring the same objectives.


A summary and consultation photos of this studies are provided in Table 4-1.


Table 4-1. Summary of the Early Engagement Activities

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
Local Community	Mukhtar of Türkoba Neighborhood	15.11.2022 Mukhtar's Office	<ul style="list-style-type: none"> • The population of the neighborhood is officially 17 thousand, and there is an increase in the population due to urban transformation. • The majority of the population consists of young people. • Although the number of schools is sufficient, the facilities of the schools are insufficient. • The people of the neighborhood mostly earn their living by working in the factories in the region. • Job opportunities have increased in the last 5 years. There are also residents of the neighborhood working at Firat Plastik. • Communication with Firat Plastik is at a good level. Meetings are held for the purpose of information flow and assistance. • Information about the project was given. Expectation from the project is positive. Since it is a workers' zone, this project will also provide employment. • Communication is mostly done face-to-face or via WhatsApp. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
Local Community	Mukhtar of Muratçeşme Neighborhood	24.11.2022 On the Phone	<ul style="list-style-type: none"> • Mukhtar previously worked for Firat Plastic. • The age group of the residents is mostly middle-aged. • There is no school in the neighborhood but there is a project on this subject. • The education level of the residents of the neighborhood is high school graduate and university graduate. • It has been stated that there are job opportunities in the neighborhood, but there are no employees to work. • He has no information about the project. • Although Firat Plastic was previously contacted for the needs of the poor neighborhood residents, these negotiations did not reach a conclusion. • Among the residents of the neighborhood, there are employees working in Firat Plastic. • There are deficiencies in the neighborhood such as a park, rain drain, library and kindergarten. 	Due to the fact that the interview was conducted via telephone, no photo could be taken with the mukhtar.


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> Mukhtar suggested that Firat Plastic can be contacted through a face-to-face meeting. 	
Local Community	Mukhtar of Hürriyet Neighborhood	15.11.2022 Mukhtar's Office	<ul style="list-style-type: none"> The population of the neighborhood is 22 thousand. There is an increase in population due to urban transformation. The age group of the people living in the neighborhood is mostly middle-aged. There is one primary school in the neighborhood, but the school is insufficient due to the arrival of students from other neighborhoods. There are people from every province of Anatolia in the neighborhood. Job opportunities are high, but there are no personnel to work. Among the residents of the neighborhood, there are employees in Firat Plastic. However, the working conditions are heavy, they work for 12 hours. He has no information about the project. No adverse effects are expected during the realization of the project. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
Local Community	Mukhtar of Güzelce Neighborhood	15.11.2022 Mukhtar's Office	<ul style="list-style-type: none"> • The neighborhood consists mostly of residences that people use as summer houses. The population increases in the summer and decreases in the winter. With the pandemic, the neighborhood population has increased. • The most observed age group in the neighborhood is between 30-50 years old. • The education level of the neighborhood is mostly university graduates. • There are families without children and these families support the construction of a school in the neighborhood. • There is a zoning problem in the neighborhood, so there are no tradesmen and job opportunities are limited. • Horizontal growth is supported, so the population of the neighborhood is low. • No information has been given about the project. • Face-to-face or telephone contact is expected. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • It was stated that no response was received regarding communication. • The project will be positive in terms of energy resources. • Since the neighborhood is close to Firat Plastic, employment can be provided here. Job postings can be shared with the locals. • There is a shortage of schools and gyms in the neighborhood. 	
Employee of the Project	Administrative Affairs Staff	15.11.2022 Human Resources Office of Firat Plastic	<ul style="list-style-type: none"> • She has been working for Firat Plastic for 6 years. • Working hours are between 08:00-18:30. There is also a shift between 08:00-13:00 on Saturdays. • Transportation to the workplace is provided by service. • The service stop is close to the employee's home and the employee is satisfied with this service. • Meals are eaten in the workplace cafeteria; the employee pays attention to what she eats due to her pregnancy. • No food-related discomfort was experienced. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • Annual permits can be used in the desired length at any time. • Recruitment training, rules and training on labor law were received. • Trainings on health and OHS have also been received. • The employee finds the salary ideal and can receive it regularly. • Apart from the salary, there are also fringe benefits such as bonuses, monthly food allowance, gold gifts for newlyweds and those with a baby. • When there was a problem in the workplace, it was resolved by directly contacting whoever was involved in the problem. Complaint boxes are also available, but one-to-one communication is preferred. • OHS measures in the workplace are sufficient, and they are working in a unit that has no risk in this regard. • Since she is pregnant, she is flexible in using her break times. She can move around easily when she needs to move. She 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<p>can meet her own needs such as water, food and a sink, and she is free during these times.</p> <ul style="list-style-type: none"> • The employee is in the 15th week of her pregnancy. She does not have any problems with pregnancy while working. She can go home or to the doctor when she needs it. She can easily meet her need for rest. Nausea is too much. In such cases, there is no problem when she states that she will come to work late. • She wants to continue working until the legally recognized period (4 months) for pregnant women. This permit will be paid during the period. Later, she will quit her job because she wants to raise her baby herself. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
Employee of the Project	Accounting Manager	15.11.2022 Human Resources Office of Firat Plastic	<ul style="list-style-type: none"> • Working here for 15 years. • Working hours are between 08:00-18:30. There is also a shift between 08:00-13:00 on Saturdays. • Transportation to the workplace is provided by company vehicle. The vehicle is used individually. Fuel and maintenance are covered by the company. • Meals are eaten in the workplace cafeteria. Working with one of the good companies. There were no problems with the meals. • There is no problem in using annual leave. • Trainings are given to employees related to production. Trainings such as fire and first aid were given. • Salaries may be insufficient due to inflation, but an interim increase of 35% has been made, salaries are sufficient for now. Salaries are paid regularly. • Apart from the salary, there are fringe benefits such as telephone, vehicle, fuel, half salary bonus once in 3 months and monthly food allowance. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • When there is a problem in the workplace, the relevant units are contacted. Complaint boxes are available. Direct contact is preferred more often. • OHS measures are sufficient. The company has an ambulance and fire department. Appropriate clothing is provided and supervised by the company. • Break times are flexible. Lunch break is 1 hour. Regionally, there is no chance to go anywhere during the breaks. 	
Employee of the Project	Injection, Electric, Machine Worker	15.11.2022 Human Resources Office of Firat Plastic	<ul style="list-style-type: none"> • Working here for 20 years. • Working in shifts. There are two shifts as 07:00-19:00 and 19:00-07:00. • Transportation to the workplace is provided by a service and is satisfied with this service. The service stop is close to the house. • Meals are eaten in the workplace cafeteria and the conditions of the meals are quite good. There were no problems with the meals. • There is no problem in using annual leave. • Forklift driver's license trainings were received at the workplace. 	


Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • Appropriate salary is given. Health insurance is paid high. Salaries are paid on time. • Bonuses are given outside of the salary. Social events are organized. Monthly food aid is provided. Gold is given to newlyweds. • In case of a complaint at the workplace, he communicates with his superior. It is known that there are complaint boxes and that these boxes are followed. • OHS measures are sufficient; all kinds of opportunities are provided. • Break times are spent efficiently. Morning tea is brought to the department, in the afternoon, tea is served in the cafeteria., there are areas in the corridors for break times. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
Employee of the Project	Injection Department Employee	15.11.2022 Human Resources Office of Firat Plastic	<ul style="list-style-type: none"> • Working here for more than 1 year. • Working in shifts. • Transportation to the workplace is provided by service. • The service stop is close to the employee's home and the employee is satisfied with this service. • Meals are eaten in the workplace cafeteria. There were no problems with the meals. • Annual leave has not been used yet. • In these economic conditions, salaries may be insufficient, but salaries are paid on time. • In addition to salaries, monthly supplies and bonuses are provided. • If there is any problem in the workplace, it is reported to the chief. • OHS measures are sufficient. • Break times are spent efficiently. • The employee suffered a cerebral hemorrhage in 1996. While living in Van, he applied to İŞKUR and joined Firat Plastic from the disabled staff. Here, he is treated 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<p>sensitively about health. It is not subject to any discrimination.</p>	
Employee of the Project	Specialist Assistant	<p>15.11.2022 Human Resources Office of Firat Plastic</p>	<ul style="list-style-type: none"> • Working here for 10 months. • Working hours are between 08:00-18:30. There is also a shift between 08:00-13:00 on Saturdays. • Transportation to the workplace is provided by service. The service stop is close to the employee's home and the employee is satisfied with this service. • Meals are eaten in the workplace cafeteria. There were no problems with the meals. • There is no problem in terms of annual leave, those who want can use it. She has not used it yet. • OHS and first aid trainings are provided. These trainings are given according to a certain calendar. • The salary is sufficient and is taken regularly. • In addition to the salary, monthly supplies and bonuses are given. Gold is given to newlyweds. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • In case of any problems in the workplace, the manager is contacted. • OHS measures are sufficient. • Break times are flexible and they can take a break if needed. 	
Employee of the Project	Security Chef	15.11.2022 Meeting Room of Firat Plastic	<ul style="list-style-type: none"> • He has been working here for 20 years as a part of Çetin Security Company. • It works in two shifts, between 07:00-19:00 and 19:00-07:00. • Transportation to the workplace is provided by service. The service stop is close to the employee's home and the employee is satisfied with this service. • Meals are eaten in the workplace cafeteria. There were no problems with the meals. • Annual permits can be obtained in line with a plan. • First aid, safety and fire trainings were received. • The salary is sufficient and is taken regularly. • In addition to the salary, there are bonuses and food aid. • When there is a complaint at the workplace, HR is contacted, or 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<p>they are trying to solve it among themselves.</p> <ul style="list-style-type: none"> • OHS measures are sufficient. • Break times are flexible as no heavy work is done. 	
Employee of the Project	Chef	15.11.2022 Meeting Room of Firat Plastic	<ul style="list-style-type: none"> • He has been working here for 24 years as a part of Sofra Catering Company. • Working hours are between 07:00 and 16:00. He works 24 hours once a week. • Transportation to the workplace is provided by service. The service stop is close to the employee's home and the employee is satisfied with this service. • There is no problem in using annual leave. • Environment, OHS, hygiene and fire trainings were received at the workplace. • The salary is sufficient and is taken regularly. • The company to which the employee is affiliated does not offer fringe benefits other than salary. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • When he has a problem at work, he solves it himself or reports it to his superiors. • OHS measures are sufficient. • Break times can be spent efficiently. 	
Employee of the Project	Occupational Physician	15.11.2022 Infirmary of Firat Plastic	<ul style="list-style-type: none"> • He has been working here as an occupational physician for 11 months. • Working full time. He also works on Saturdays twice a month. • Transportation to the workplace is provided by the company vehicle. The vehicle is used individually. He is satisfied with the vehicle. • Meals are eaten in the workplace cafeteria. The employee is satisfied with the food. It has been reported that the meals were prepared and inspected in the workplace cafeteria. • Annual leave has not been used yet, but there is no administrative problem. • It was stated that no training was received in the workplace. • The salary is sufficient and is taken regularly. 	

Stakeholder	Interviewee / Title	Consultation Date and Place	Remarks from the Consultation	Consultation Photos
			<ul style="list-style-type: none"> • Bonuses are taken in addition to the salary. • In case of any problem in the workplace, it is applied to the higher authority. • OHS measures are sufficient. • Employees often come because of seasonal diseases. 3 tests (Flu, Influenza and Covid) are performed in each incoming case. There are no serious work accidents. Minor cases such as cuts, burns, sprains were encountered. Here, a lot of importance is given to the infirmary. In cases of work accidents, state hospitals are not visited for diagnosis and treatment, the patient is sent to private hospitals for treatment. 	

4.2 Stakeholder Identification

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening a wide array of potential stakeholders, including institutions, associations, NGOs and other informal groups, that should be involved in the engagement process.

The stakeholders were classified according to their type and status. The identified stakeholders are presented in Table 4-2.

Table 4-2. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<i>External Stakeholders</i>		
Local Communities (Settlements in the Aol)		
Mukhtars and residents of the following neighborhoods <ul style="list-style-type: none"> Türkoba Neighborhood (Büyükçekmece / İstanbul) Güzelce Neighborhood (Büyükçekmece / İstanbul) Hürriyet Neighborhood (Büyükçekmece / İstanbul) Muratçeşme Neighborhood (Büyükçekmece / İstanbul) 	✓	
Government		
<ul style="list-style-type: none"> İstanbul Provincial Directorate of Environment, Urbanization and Climate Change İstanbul Provincial Directorate of Agriculture and Forestry İstanbul Provincial Directorate of Culture and Tourism İstanbul Provincial Directorate of Health İstanbul Provincial Directorate of Family, Labor and Social Services Governorship of İstanbul Sub-Governorship of Büyükçekmece District 		✓
Municipality		
<ul style="list-style-type: none"> İstanbul Municipality Büyükçekmece Municipality 	✓	✓
NGOs		
<ul style="list-style-type: none"> İstanbul Chamber of Commerce and Industry 		✓
Universities and Schools		
<ul style="list-style-type: none"> Arel University 	✓	✓
<i>Internal Stakeholders</i>		
<ul style="list-style-type: none"> Firat Plastic Employees Contractors/Subcontractors/Suppliers 	✓	✓

4.3 Stakeholder Engagement Program

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the Project activities, including Project performance, Project development and investment plans and their implementation.

The methods of communication to be utilized are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan and Environmental and Social Action Plan,
- Meetings with regulatory bodies,
- Public meetings,
- Published on local municipalities' website (if available) and/or on a dedicated Project website,
- Announcements through mukhtars and locals,
- Provision of general information on noticeboards at key public locations.

The following summarizes the stakeholder engagement program in terms of:

- Stakeholder groups to be consulted,
- Engagement topics,
- Type of information disclosed / engagement methods,
- Frequency and responsible.

Table 4-3. Stakeholder Engagement Program

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>Information Disclosure</u></p> <ol style="list-style-type: none"> 1. Purpose, start date, duration, and nature of operations activities, 2. Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts, 3. Impacts on local communities, 4. Grievance mechanism disclosure, 5. Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results, 6. Continue disclosing information via the Project company website. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SAS HR Unit
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>External Grievance Mechanism</u></p> <ol style="list-style-type: none"> 1. Disclosure of grievance mechanism to communities, 2. Disclosure of grievances received and resolved to communities. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation	SAS
Local business and industries All affected settlements and mukhtars Project Workers	<p><u>Employment and Procurement Strategies</u></p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Procurement of supplies and services. 	Dependent on stakeholder classification	Implementation and review for updates every 2 years during the operation and as required	SAS
All affected settlements and Interested parties Local communities Local government Local businesses and industries	<p><u>Use of Emergency Response and Preparedness</u></p> <ol style="list-style-type: none"> 1. Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders, 2. Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders. 	Drills Workshops Community meetings	Annual drill programs or as required	HSE Manager HSE Staff SAS

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
NGOs	<p><u>Social progress, economic and social development, and environmental protection</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> Mitigation measures against potential environmental and social risks, Sustainability criteria, Social responsibility projects, implementation principles. 	<p>Focus group meetings</p> <p>Workshops</p> <p>Company website</p>	As required / As requested	SAS
<p>Local industries</p> <p>All affected settlements and mukhtars</p> <p>Büyükçekmece Municipality</p>	<p><u>Road Transportation and Traffic Safety</u></p> <ol style="list-style-type: none"> Road safety awareness, including on safe crossing of the bypass and access roads, Types, number, and frequency of vehicles that can be anticipated through different phases of the Project, Collaboration with local communities and responsible authorities to improve signage, visibility, and overall safety of roads, particularly along stretches located near schools or other locations where children are present, Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns), Communication of traffic measures and Project road usage with mukhtars and other industries. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	As requested, / as needed for others	<p>SAS</p> <p>HSE Staff</p>
<p>All affected settlements and mukhtars</p> <p>Büyükçekmece Municipality</p>	<p><u>Management of environmental and social risks of the Project</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> Environmental and social monitoring program Environmental and social monitoring results Overall information about progress of the Project 	<p>Meetings with Mukhtars</p> <p>Brochures</p> <p>Workshops</p>	As required / As requested	<p>SAS</p> <p>HSE Staff</p> <p>HSE Manager</p>

Target Group	Purpose of Engagement and Engagement Topics	Method of Engagement	Frequency	Responsible
Vulnerable Groups	<p><u>Employment and any other interest of vulnerable groups</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Recruitment of employees, 2. Training of staff, 3. Use of roads, water, and other infrastructure, increase in traffic density, 4. Local employment, 5. Important commercial opportunities, 6. Environmental impacts. 	<p>Meetings targeting any identified vulnerable groups</p> <p>Women meetings and focus group discussions</p>	<p>Meetings during the operation</p> <p>As requested / as required for other meetings</p>	<p>SAS</p> <p>HR Unit</p>
<p>Workforce</p> <p>All affected settlements and mukhtars</p> <p>Local industries</p> <p>Local government</p> <p>Büyükçekmece Municipality</p>	<p><u>Community Health</u></p> <ol style="list-style-type: none"> 1. Provide training on Company policies (employees and contractors) on respectful and appropriate behavior with communities, 2. As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. 	<p>Face to face meetings</p> <p>Dependent on stakeholder classification</p>	<p>At least annually face to face meetings</p> <p>As requested / as needed for others</p>	<p>SAS</p>
<p>Employees of the Project</p> <p>Project Contactor employees</p>	<p><u>Employee welfare</u></p> <p>Provision of information on:</p> <ol style="list-style-type: none"> 1. Employee Grievance Mechanism, 2. Labor rights, 3. OHS procedures, 4. Contractor management. 	<p>Face to face interview</p> <p>OHS Board</p> <p>Labor audits</p>	<p>Monthly or when required due to the results of grievance mechanism</p>	<p>SAS</p> <p>HSE Staff</p>

4.4 Tools & Methods for Information Disclosure

The Project will provide transparent informative material to the affected communities and the stakeholders in a consistent and timely manner. The manner in which this material will be disclosed as discussed in the sections below.

4.4.1 Internal / Website

Project specific web site (<https://www.firat.com/>) will keep information on the operations updated on an assigned webpage in Turkish, English, Russian and Arabic.

On the Project website, there is contact form for receiving the complaints or suggestions (Figure 4.1).

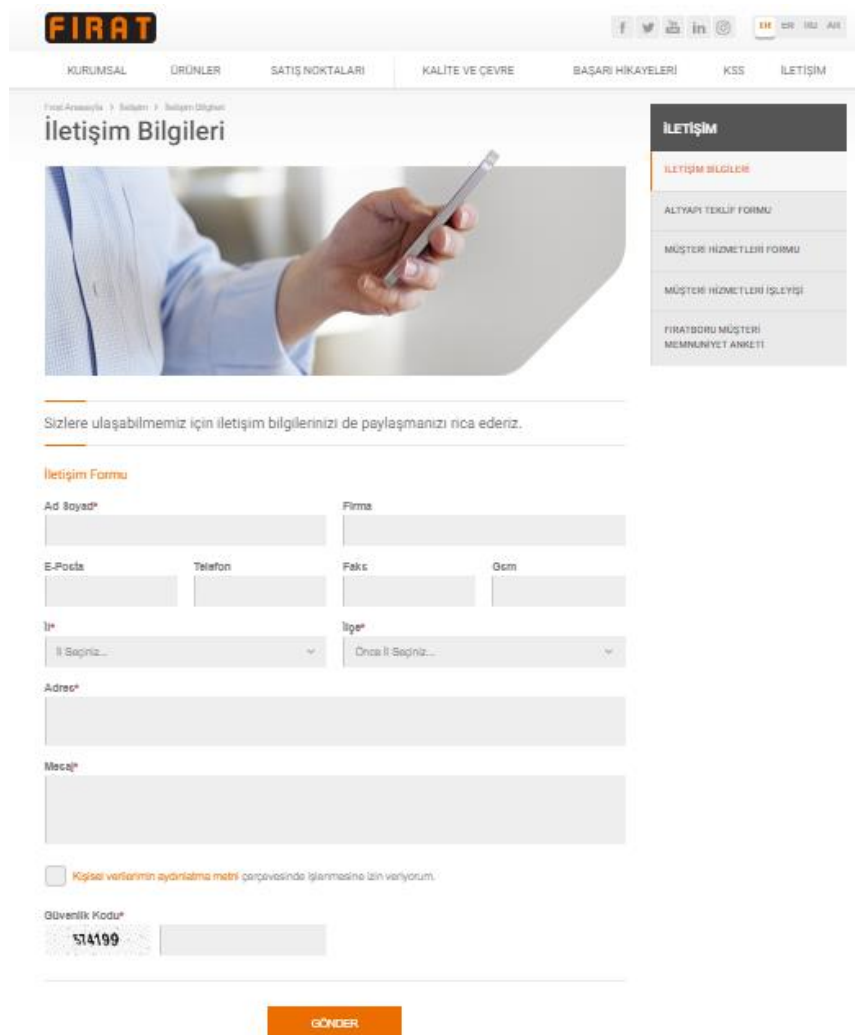


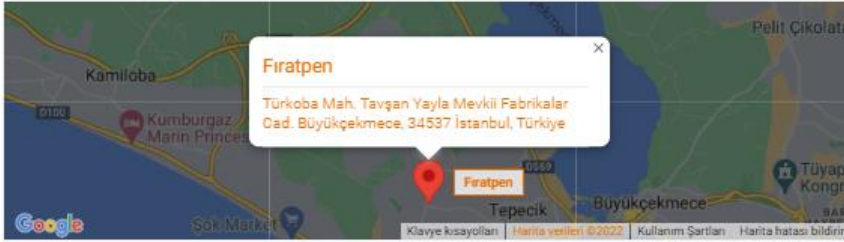
Figure 4.1. Contact form of Firat Plastic

The physical address, telephone number, fax number and e-mail address of the Project owner are given, and the factories located in other provinces and countries are also included. The physical address and other contact information of the mentioned showrooms shall be given on the website (see Figure 4.2) below.

Moreover, informative brochures, Grievance Mechanism Procedure and Stakeholder Engagement Plan shall be disclosed on this assigned website for the Project.

Firat Plastik Kauçuk San. ve Tic. A.Ş.

📍 Türkoba Mahallesi Firat Plastik Caddesi No: 23 34537 Büyükçekmece İstanbul, Türkiye
 📞 90 (212) 866 41 41 - 90 (212) 866 42 42
 📠 90 (212) 859 04 00 - 90 (212) 859 05 00
 ✉️ export@firat.com - info@firat.com - musterihizmetleri@firat.com



Ankara

📍 Organize Sanayi Bölgesi Avrupa Hun Bulvarı No:8 06935 Sincan Ankara, Türkiye
 📞 90 (312) 267 08 71 - 90 (312) 267 08 72
 📠 90 (312) 267 08 75
 ✉️ firat@firat.com



Figure 4.2. Contact Information of Firat Plastic

4.4.2 Information Sheets

Information sheets including a non-technical summary of the activities in the facility, key project issues and details regarding Project's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the assigned website and at the Project offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

4.4.3 Responding to Stakeholders

Authorities of the Project will give full and timely responses to requests, comments, and questions of local communities in addition to implementing the grievance mechanism procedure in the case of complaints. All requests shall be treated respectfully. In the event that it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

On the Project website, material providing information about the Project will be available, and stakeholders will be kept posted. When needed, matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local

communities based on impact assessment surveys carried out by the Project. As long as it is appropriate, relevant Project information will be disclosed to the public.

4.4.4 Disclosure Activities

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities should be widely and proactively publicized, especially among Project affected parties, at least 1 (one) week prior to any meeting via website announcements, through mukhtars and posted information banner in mukhtars' offices,
- The location and timing of any meetings will be designed to maximize accessibility to Project affected stakeholders, if needed transportation arrangement will be made by the Project to increase participation in meetings,
- The information presented (via presentations, leaflets, website publications etc.) will be clear and non-technical and will be presented in the local language understood by those in the communities,
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and the Project will encourage the stakeholders to raise their concerns/complaints and suggestions, and
- Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up on (see Appendix B: Consultation Form), the person who raised the issue will be informed after the meeting when the issues resolved.

Project related information communication meetings will be open to the entire public and will be announced through local mukhtars. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed and/or requested, separate meetings can be organized at venues frequently visited by women for women-only meetings.

The Project will inform the public via meetings, media and other similar means, about how people can access Project related documents (such as this SEP and Grievance Mechanism Procedure) and how they can submit comments, complaints and suggestions.

In case of unexpected pandemic situations like COVID-19, it is required to develop safe and effective stakeholder engagement and grievance management for maintaining a proactive communication process and providing communities with information in a timely manner. The alternative communication methods such as online platforms should be produced and provided

by the Project. Based on the principles of stakeholder engagement and grievance mechanism, alternative communication tools and methods can be as follows:

- Digital platforms, social media and messaging platforms,
- Secure grievance portal and announcements through the Project website,
- Online stakeholder engagement workshops by using live web streaming,
- Multiple communication options such as closed captioning for video/conference calls.

5 MANAGEMENT OF GRIEVANCES

5.1 Grievance and Feedback Procedure

Grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (PAP).

Grievance procedures will be coordinated through the appointed Social Affairs Staff (SAS) with the help of HSE Staff and HSE Manager who are the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. The SAS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project SAS, if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of the Project.

The details of the Grievance Mechanism of the Project are given in Grievance Mechanism Procedure (FRT-PRC-SOC-GMP-001).

5.1.1 Collection, Registration and Evaluation of Grievances

Handling of grievances (collection, registration and evaluation) will follow these steps:

- Initiate the grievance procedure by filling up a Complaint Register Form (*see Appendix A: Complaint Register Form*), mainly by the SAS,

- SAS registers the grievance/comment in the grievance database (see *Appendix D: Grievance Database*);
- The SAS investigates the grievance and makes the first evaluation with the help relevant Departments' Chief / Managers;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 working days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 calendar days after the grievance is received);
- The grievance is officially closed after related documentation (see Appendix E: Grievance Closure Form) is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated among the related departments; however, handling and tracking should be ensured to be done mutually.

A complaint register form is prepared for official notification of complaints about the Project. "Open door policy" shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

5.1.2 Feedback to the Stakeholders

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the Project builds a more meaningful relationship with stakeholders. This is essential in maintaining a 'social license to operate', which refers to the ongoing acceptance of a company or industry's standard business practices and operating procedures by its employees, stakeholders, and the general public.

The SEP will be reviewed and revised (if needed) annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated, if necessary.

5.2 Grievance Mechanism Communication

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places.

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of the Project). These two mechanisms will be run by the Project SAS, HSE Staff and/or HSE Manager. During the resolution of the internal or external grievances, different departments can be collaborated such as Quality Insurance, HSE Manager and HR Unit, etc.

The details on how the grievances are collected and issued are given in Grievance Mechanism Procedure (FRT-PRC-SOC-GMP-001), for more detail please refer to the mentioned procedure.

5.3 Contact Details

The existing contact details of the Project is given below. The contact information regarding the assigned SAS (name and contact number/e-mail address) should be included when this Plan is updated.

Table 5-1. Contact Details of the Project

Firat Plastic Rubber Industry and Trade Inc..	Contact Person on the Project Site
<p>Website: https://www.firat.com/ Project Site Address: Türkoba Mah. Fırat Plastik Cad. No: 23 34537 Büyükçekmece / İstanbul, Phone: + 90 (212) 866 41 41</p>	<p>Contact Persons: Serhat ATAMER Social Affairs Staff / Corporate Communications Manager E-Mail: s.atamer@firat.com Phone: To be determined.</p> <p>Serdar SARIKAYA HSE Manager E-mail: s.sarikaya@firat.com Phone: To be determined.</p>

5.4 Customer Grievances

For the customer grievances Fırat Plastic has a specific procedure of the Project. The procedure explains the responsible personnel, the steps to be followed when a customer complaint is received, relevant forms and other documents to be filled up and kept in DCC.

5.5 Other Grievance Redress Mechanisms

In addition to Fırat Plastic's grievance mechanism, the residents and/or Project stakeholders can apply to TKYB's existing grievance mechanism and national-level grievance mechanisms such as CİMER and YİMER.

TKYB's Environmental Complaint Mechanism: Any parties directly and/or significantly affected by environmental impacts arising from the TKYB's operational or financial activities can submit a complaint to the TKYB. Complaints are systematically archived and promptly handled. The online form available on the contact webpage of TKYB (can be filled. Also, the phone number and physical address of the general directorate of TKYB is given as:

- www.kalkinma.com.tr
- Online complaint/suggestion form: <https://kalkinma.com.tr/en/contact-us/contact-information>
- Phone number: +90 216 636 87 00
- Fax number: +90 216 636 89 28
- E-mail address: haberlesme@kalkinma.com.tr
- Physical address: Saray mahallesi. Dr. Adnan Büyükdeniz caddesi. No:10 34768 Ümraniye/İstanbul/Türkiye

Presidency's Communication Center: The Presidency's Communication Centre (CİMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

- www.cimer.gov.tr
- Call Centre: 150
- Phone number: +90 312 525 55 55
- Fax number: +90 0312 473 64 94
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates.

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

- www.yimer.gov.tr
- Call Centre: 157
- Phone number: +90 312 5157 11 22
- Fax number: +90 0312 920 06 09
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the Republic of Turkey General Directorate of Migration Management

6 MONITORING

6.1 Review and Revision of this Plan

This SEP will be reviewed annually during operation. During steady state operations, this Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances or operational needs of the Project. Revision of this Plan will be the responsibility of SAS in coordination with the HR Unit.

If the circumstances change, this Plan may be updated on an “as required” basis.

Any revisions to this Plan will be uploaded to the Document Control Center (DCC) and the Project website to ensure that all internal and external stakeholders have access to the latest version of this SEP.

6.2 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the stakeholder engagement performance.

Table 6-1. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database
% of visitors that are received Visitor Training/Instructions on general site rules, especially OHS issues	100% of the visitors are received Visitor Training/Instructions	Visitors Registers
Auditing Grievance Procedure to ensure that it is being implemented and grievance are being adequately addressed	Annual audit complete target of 100% of grievances close out to satisfaction of complainants within 30 working days	Audit Report
% item of Social Responsibility activities that implemented	Target of 80%	Annual Reports

6.3 Key Monitoring Activities

The Project will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health and safety (labor rights) and social performance of the Project mainly through:

- Revision, improvement or extension of the monitoring activities, parameters, locations and frequency; and
- Reviews and revisions of the management plans and procedures.

The Project will monitor the effectiveness of the engagement processes by analyzing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and
- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

The key monitoring activities will focus on ensuring compliance with the requirements set out in this Plan using the key performance indicators.

Table 6-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	<p>The Project will review Grievance Log / Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include:</p> <ul style="list-style-type: none"> • number of outstanding complaints and grievances opened in the month, 	Grievance Database	Monthly	Project office

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
	<ul style="list-style-type: none"> number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), number of complaints grievances closed in the month; and type of grievance. 			
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Project office
Community Engagement Activities	The SAS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Project office
Disclosure Materials and Feedback to Communities	SAS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SAS will monitor feedback to local communities	Community Info System on the Website	Quarterly	Project office
Social Responsibility Program	SAS will monitor and record the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement reports.	Annual reports	Annually	Project office

7 TRAININGS

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of this SEP will be followed by the Social Affairs Staff and other personnel and supervisors of the Project Contractors are also involved in or overseeing the stakeholder engagement activities and grievance mechanism procedure.

7.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e. workers of contractors and/or subcontractors). The trainings

will be given in the first “Induction Training” session. All employees of the Project and contractors are required to participate in community relations and human rights training.

7.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if there any) for key personnel involved in the community, then it will be provided to those and employees for grievance management. Specific training on the application of the Stakeholder Engagement Plan and Grievance Management is also provided to the Social Affairs Staff and other personnel with supervisors of the Project.

8 AUDITING AND REPORTING

8.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Affairs Staff during the operational phase to ensure the assessment of the social responsibility program and overall stakeholder engagement. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this SEP.

The conformance with this SEP will be subject to periodic assessment as part of the Firat Plastic audit program and separately by Project Lenders.

8.2 Record Keeping and Reporting

Record keeping will be done by SAS during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations and incidents which will be managed according to the Project procedures.

On monthly basis, an overview of the grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out and engagement activities as completed/ongoing will be recorded periodically. The SAS will evaluate and conclude this overview with project management in the monthly management progress meetings.

APPENDICES

Appendix A: Complaint Register Form

Appendix B: Consultation Form

Appendix C: EIA Exemption Letters of Firat Plastic

Appendix D: Grievance Database

Appendix E: Grievance Closure Form

Appendix A: Complaint Register Form

Complaint Register Form		
Reference No:		
Full Name <i>Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.</i>	Name & Surname: _____ <input type="checkbox"/> wish to raise my grievance anonymously <input type="checkbox"/> request not to disclose my identity without my consent	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted	
Details Related to Grievance:		
Description of Incident or Grievance: _____ What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:		
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (Date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (Provide details)	
What would you like to see happen to resolve the problem? _____ _____		
Only for internal usage: Status of complaint		
	Date:	Signature:
The complaint is closed by:		
Actions taken (Provide details): _____ _____		

Appendix B: Consultation Form

Consultation Form									
Reference No:									
Person Filling the Form:			Date:						
Interview Agenda:			Reference No:						
Information on Consultation									
Interviewee Institution:			Communication Type						
Name-Surname of the Interviewee:			Phone/Free Line	<input type="checkbox"/>					
Phone:			Face to face interview	<input type="checkbox"/>					
Address:			Web-site/ E-Mail	<input type="checkbox"/>					
E-Mail:			Other (Explain)	<input type="checkbox"/>					
Stakeholder Type									
Public Institution	<input type="checkbox"/>	Project Affected People	<input type="checkbox"/>	Private Enterprise	<input type="checkbox"/>	Trade Association	<input type="checkbox"/>	NGO	<input type="checkbox"/>
Interest Groups	<input type="checkbox"/>	Industry Associations	<input type="checkbox"/>	Workers' Union	<input type="checkbox"/>	Media	<input type="checkbox"/>	University	<input type="checkbox"/>
Detailed Information on Consultation									
Questions related to Project									
Concerns/feedbacks related to Project									
Responses to the views expressed above:									

Appendix C: EIA Exemption Letters of Fırat Plastic



T.C.
İSTANBUL VALİLİĞİ
İl Çevre Müdürlüğü

Sayı : B.19.4.İÇM.4.34.00.02/
Konu : ÇED Yönetmeliği

2506

11 EKİM 2002

FIRAT PLASTİK KAUÇUK SAN. VE TİC. A.Ş.
(Türkoba köyü Tavşan Yayla Mevkii Tepecik)
Büyükdere/İSTANBUL

İlgi : Bİla tarih ve sayılı dilekçeniz.

İlgi yazınız ile İstanbul İl, Büyükdere İlçesi, Türkoba köyü Tavşan Yayla Mevkii Tepecik adresinde faaliyet gösteren şirketinizin, faaliyet konusu itibarıyla Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği kapsamında olup olmadığı hususunda Valiliğinizin İl Çevre Müdürlüğü tarafından değerlendirilmesi istenmiştir.

Müdürlüğümüz Teknik Elemanlarımızın 09.08.2002 tarihinde yerinde yaptıkları inceleme sonucunda, tesisinizde çeşitli ebatlarda plastik boru, hortum ve fittings üretimi yapıldığı tutanakla tespit ve beyan edilmiştir.

Müdürlüğümüz ÇED Komisyonu tarafından yapılan inceleme ve değerlendirme neticesinde, 04.09.2002 tarih ve 2002 / 30 sayılı karar ile, faaliyetiniz, 06.06.2002 gün ve 24777 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği" EKI ve EK II listelerinde bulunmadığından dolayı, anılan Yönetmelik kapsamı dışında değerlendirilmiştir.

Ancak, çevre değerlerinin korunması açısından 2872 Sayılı Çevre Kanununa istinaden yürürlüğe giren;

- 02.11.1986 tarih ve 19269 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Hava Kalitesinin Korunması Yönetmeliği" nin,
- 04.09.1988 tarih ve 19919 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Su Kirliliği Kontrolü Yönetmeliği" nin,
- 11.12.1986 tarih ve 19308 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Gürültü Kontrolü Yönetmeliği" nin,
- 14.03.1991 tarih ve 20814 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Katı Atıkların Kontrolü Yönetmeliği" nin,
- 11.07.1993 tarih ve 21634 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Tehlikeli Kimyasallar Yönetmeliği" nin,
- 27.08.1995 tarih ve 22387 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Tehlikeli Atıkların Kontrolü Yönetmeliği" nin,
- 05.01.2002 tarih ve 24631 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Çevre Denetim Yönetmeliği" nin,
- 10.12.2001 tarih ve 24609 sayılı Resmî Gazete' de yayımlanarak yürürlüğe giren "Toprak Kirliliğinin Kontrolü Yönetmeliği" nin,

İlgili hükümlerine, çevre ve insan sağlığının korunması ve geliştirilmesine yönelik önlemlere uyulması, yürürlükteki mevzuat çerçevesinde ilgili kurums-kuruluşlardan gerekli izinlerin alınması zorunludur.

Herhangi bir proses değişikliği, kapasite artırımı, alan genişlemesi halinde Valiliğiniz İl Çevre Müdürlüğüne başvuruda bulunulması gerekmektedir.

Sunulan, görüş yazısı olup izin yerine geçmemektedir.

Bilgilerinizi rica ederim.

Yasuz ÇENGEL
Vali



T.C.
İSTANBUL VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü



Sayı : B.09.4.İLM.0.34.07.00/
Konu : ÇED / Görüş.

FIRAT PLASTİK KAUÇUK SAN. Ve TİC. A.Ş.
Türkoba Köyü P.K. 12
BÜYÜKÇEKMECE/İSTANBUL

İlgi: 09.03.2012 tarih ve 13457 sayılı kayıtlı başvuru yazımız.

İlgi yazınız ile; İstanbul İl, Büyükçekmece İlçesi, Türkoba Köyü mevkiinde planlanan Enerji Nakil Hattı faaliyetinin konusu itibarıyla Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği kapsamında Valiliğimiz Çevre ve Şehircilik İl Müdürlüğü tarafından değerlendirilmesi istenmiştir.

Müdürlüğümüz Teknik Elemanlarımız dosyasında yaptıkları inceleme sonucunda; "FIRAT PLASTİK KAUÇUK SAN. Ve TİC. A.Ş. ile TEİAŞ arasında imzalanan 05.05.2011 tarih ve S.02.04 sayılı bağlantı anlaşması ile Türkoba Köyü mevkiinde dört direkli 800 m. uzunluğunda 154 Kv. Mülkiyeti TEİAŞ'a ait olan Enerji nakil hattı yapılacağı" hususları beyan edilmiştir.

Bu bağlamda söz konusu faaliyet, Müdürlüğümüz Teknik Elemanları tarafından yapılan inceleme ve değerlendirme neticesinde, 17.07.2008 gün ve 26939 sayılı (Değişik 30.06.2011-27980) Resmî Gazete' de yayımlanarak yürürlüğe giren "Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği" EK-II Madde 38 – "154 kV üzeri gerilimdeki enerji iletim tesisleri (5 Km ve üzeri)." kapsamında olup; enerji iletim hattının 154 kV- 5 km üzerinden (154 kv.-800 m.) az olması nedeniyle ÇED Yönetmeliği hükümleri uygulanmasına gerek görülmemektedir.

Ancak, bahse konu faaliyet ile ilgili olarak çevre değerlerinin korunması açısından 2872 Sayılı Çevre Kanunu (Değişik 26/4/2006-5491) ve bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve mer'î mevzuat uyarınca ilgili kurum-kuruluşlardan gerekli izinlerin alınması yasal bir zorunluluk olup, faaliyet ile ilgili herhangi bir proses değişikliği, kapasite artırımı, alan genişlemesi halinde Valiliğimiz Çevre ve Şehircilik İl Müdürlüğüne başvuruda bulunulması gerekmektedir. İş bu yazı, görüş yazısı olup izin yerine geçmemektedir.

Bilgi ve gereğini rica ederim.

Prof. Dr. Mehmet Emin BİRPINAR
Vali a.
İl Müdürü



T.C.
İSTANBUL VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü



Sayı : 71280893/220.03
Konu : ÇED / Görüş.

FIRAT PLASTİK KAÇUK SAN. VE TİC. A.Ş.
Türksaba Köyü Tavşan Yayla Mevkii Tepecik
BÜYÜKÇEKMECE/İSTANBUL

İlgi: 18.03.2013 tarih ve 25032 sayılı kayıtlı başvuru yazınız.

İlgi yazınız ile; İstanbul İl, Büyükçekmece İlçesi, Türksaba Köyü, Tavşan Yayla Mevkii, Tepecik adresinde faaliyet gösteren tesisiniz faaliyetlerinin Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği kapsamında olup olmadığı hususunda Valiliğimiz Çevre ve Şehircilik İl Müdürlüğü tarafından değerlendirilmesi istenmiştir.

Müdürlüğümüz Teknik Elemanların 28.03.2013 tarihinde ve dosyasında yaptıkları inceleme sonucunda; "testite sert PVC profil ve boru, yumuşak PVC örgülü ve örgülsüz hortum, PVC kapı pencere doğrama, polietilen, polipropilen düz ve folyolu boru, pex boru, triplex boru, sarmal boru, alpeç boru, ekleme parçaları, film masterbatch, PVC, polietilen ve polipropilen bağlama parçaları, metal enjeksiyon üniteleri, galvaniz sac, profil, pt. ii conta, ve kauçuk fitil üretimini yapıldığı, boru, hortum, fitting plastik enjeksiyon üretimine ait, 11.09.2002 tarih ve 2506 sayılı ÇED görüş yazısının olduğu, kauçuk fitil, conta üretimine ait 17.11.2006 tarih ve 2006/04-78-1589 karar no.lu ÇED Gerekli Değildir Belgesinin verildiği, 2007 yılında üretime başlayan metal enjeksiyon ünitesinde zımbak kılıç kullanıldığı, 871 ton/yıl kapasitesinde olduğu, metal insert pres hattının 2012 yılında faaliyete alındığı, hazır gelen pürne çubukların kesim, pres ve kumlama yapıldığı, tesis 2006 ve 2010 tarihli kapasite raporları incelendiğinde kapasite artışı olmadığı" hususları tespit beyan edilmiştir.

Bu bağlamda söz konusu faaliyet, Müdürlüğümüz teknik elemanlar tarafından yapılan inceleme ve değerlendirme neticesinde, 17.07.2008 gün ve 26939 sayılı (Değişik 30.06.2011-27980) Resmî Gazete'de yayımlanarak yürürlüğe giren "Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği" EK-II Listesi Madde 3. kapsamında olan kauçuk bölümünde kapasite artışı olmadığından 17.11.2006 tarih ve 2006/04-78-1589 karar no.lu ÇED Gerekli Değildir Belgesinin geçerliliği, metal enjeksiyon ünitesi Ek-II Listesi Madde 8.a. kapsamında olmakla birlikte üretim kapasitesinin 1000 ton/yıl dan (871 ton/yıl) az olması nedeniyle anılan Yönetmelik hükümlerinin uygulanmasına gerek olmadığı, plastik enjeksiyon ve metal insert pres üretimine ÇED) Yönetmeliği" EK-I ve EK-II Listelerinde bulunmadığından dolayı, anılan Yönetmelik kapsamı dışında değerlendirilmiştir.

Anacak, bahse konu faaliyet ile ilgili olarak çevre değerlerinin korunması açısından 2872 sayılı Çevre Kanunu (Değişik 26/4/2006-5491) ve bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve mer'î mevzuat uyarınca ilgili kurum-kuruluşlardan gerekli izinlerin alınması yasal bir zorunluluk olup, faaliyet ile ilgili herhangi bir proses değişikliği, kapasite artırımı, alan genişlemesi halinde Valiliğimize Çevre ve Şehircilik İl Müdürlüğüne başvuruda bulunulması gerekmektedir. İş bu yazı, görüş yazısı olup izin yerine geçmemektedir.

Bilgilerinizi ve gereğini rica ederim.


Ahmet AYTAÇ
Vali a.
İl Müdürü

Bahariye Bulvarı No: 137 - 34049 - Sarıyer / İstanbul - İSTANBUL
Telefon : (0 212) 318 41 00 (pbx) - Faks : (0 212) 318 41 49
Elektronik Posta : istanbul@cevresehirclik.gov.tr
Elektronik Adres : istanbul@cevresehirclik.gov.tr

Ayrıntılı bilgi için lütfen : Zih. F. İMİN - İnceleme YÖRÜKÇEYER - Telefon: (0 212) 318 41 00/4481
Bu konuda ilâhî yardımcı olan ângelilerle birlikte pazul olan Sivas Ni ve K7 (hayat) nerli/dinin Allah'a şükranıyla değerlendirildi. Teşekkür.



T.C.
İSTANBUL VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü

Sayı : 71280893 E-2014/471

11.08.2014

Konu : Firat plastik kauçuk san. Ve Tic. A.Ş.

FIRAT PLASTİK KAUÇUK SAN. VE TİC. A.Ş.
(Türkoba Mah. Firat Plastik Cad. No:23 Büyükdere İstanbul)

İlgili :07.08.2014 tarih ve 13366 Referans No'lu Beynuru


İlgi yazınız ile; İstanbul İli, Büyükdere İlçesi, Türkoba Mah. Firat Plastik Cad. No:23 adresinde faaliyet göstermekte olan tesisiniz için, Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği kapsamında olup olmadığı hususunda Valiliğimiz Çevre ve Şehircilik İl Müdürlüğü tarafından değerlendirilmesi istenmiştir

Müdürlüğümüz Teknik Elemanlarımız dosyasında yaptıkları inceleme sonucunda; "tesiste sert PVC Profil ve boru, yumuşak PVC örgülü ve örgüsüz hortum, PVC kapı pencere doğrama, polietilen ve polipropilen dız ve folyolu boru, pax boru, triplex boru, sarmal boru, alplex boru, ekleme parçaları, film masterbatch, PVC polietilen ve polipropilen bağlantı parçaları, metal enjeksiyon ürünleri, galvaniz sac, profil conta ve kauçuk fitil üretiminin yapıldığı, boru, hortum ve fitting plastik enjeksiyon üretimlerine ait 11.09.2002 tarih ve 2506 sayılı ÇED görüş yazısı olduğu, kauçuk fitil conta üretimine ait 17.11.2006 tarih ve 2006-04-78-1589 karar nolu ÇED Gerekli Değildir Belgesinin bulunduğu, 2007 yılında üretime başlayan metal enjeksiyon ünitesinde 871 ton/yıl kapasite ile zımsak kılıfodan muhafif parça üretiminin yapıldığı, metal insert pres hattının 2012 yılında faaliyete alındığı, tesise ait 06.04.2013 tarih ve 18908 sayılı kapsam dışı görüşü yenilene yazısının olduğu ayrıca tesise ham madde ve profil depolama ve laminasyon kaplama işlemi, polietilen boru üretimi ve jectermal sıcak su borusu üretiminin yapılmaya başlandığı, tesise ait 13.06.2011 tarih ve 2011-1519 sayılı ve 15.10.2010 tarih ve 2010-2261 sayılı kapasite raporlarının sunulduğu" hususları beyan ve tasdiht edilmiştir.

Bu bağlamda söz konusu faaliyet, Müdürlüğümüz teknik elemanları tarafından yapılan inceleme ve değerlendirme neticesinde, söz konusu proses 03.10.2013 gün ve 28784 sayılı Resmi Gazete'de yayımlanarak yürürlüğe giren "Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği" EK-II listesi Madde 3 kapsamında olan kauçuk hazırlama bölümünde kapasite artışı olmadığından 17.11.2006 tarih ve 2006-04-78-1589 karar nolu ÇED Gerekli Değildir Belgesinin geçerliliği, Ek II listesi Madde 3-a kapsamında olan zımsak enjeksiyon kısmının kapasitesinde bir değişiklik olmadığından anılan yönetmelik hükümlerinin uygulanmasına gerek olmadığı, plastik enjeksiyon, metal insert pres, ham madde ve profil depolama ve laminasyon kaplama işlemi, polietilen boru üretimi ve jectermal sıcak su borusu üretiminin ÇED Yönetmeliği Ek I ve Ek II listelerinde bulunmadığından dolayı anılan Yönetmelik kapsamı dışında değerlendirilmiştir.

Ancak, planlanan yatırım ile ilgili olarak, 2872 sayılı Çevre Kanunu ile 5491 sayılı Çevre Kanununda Değişiklik Yapılmasına Dair Kanuna istinaden çıkarılan Yönetmeliklerde ilgili hükümlerine uyulması ve diğer mer'î mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengeyi bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi gerekmektedir.

Bilgilerinizi ve gereğini rica ederim.


 Biran ÇAKMAK
 İl Müdürü a.
 İl Müdür Yardımcısı V.



T.C.
İSTANBUL VALİLİĞİ
Çevre ve Şehircilik İl Müdürlüğü

Sayı : 71280893 E-20151047

04.05.2015

Konu : Fırat Plastik Kauçuk San. Ve Tic. A.Ş.

FIRAT PLASTİK KAUÇUK SAN. VE TİC. A.Ş.
(Türkoba Mah. Fırat Plastik Cad. No:23 Büyükçekmece İstanbul)

İlgi :04.05.2015 tarih ve 31620 Referans No'lu Bağvuru

İlgi yazınız ile; İstanbul İli, Büyükçekmece İlçesi, Türkoba Mah. Fırat Plastik Cad. No:23 adresinde faaliyet göstermekte olan tesisiniz için, Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği kapsamında olup olmadığı hususunda Valiliğimiz Çevre ve Şehircilik İl Müdürlüğü tarafından değerlendirilmesi istenmiştir

Müdürlüğümüz Teknik Elemanlarımızın dosyasında yaptıkları inceleme sonucunda; "tesise sert PVC Profil ve boru, yumuşak PVC ögüllü ve ögüsüz hortum, PVC kapı pencere doğrama, polietilen ve polipropilen düt ve folyolu boru, pek boru, triplex boru, sarmal boru, alpex boru, ekleme parçaları, film masterbatch, PVC polietilen ve polipropilen bağlantı parçaları, metal enjeksiyon ürünleri, galvaniz sac, profil conta ve kauçuk fitil üretiminin yapıldığı, boru, hortum ve fitting plastik enjeksiyon üretimlerine ait 11.09.2002 tarih ve 2506 sayılı ÇED görüş yazısı olduğu, kauçuk fitil conta üretimine ait 17.11.2006 tarih ve 2006 04-78-1589 karar nolu ÇED Gerekli Değildir Belgesinin bulunduğu, tesise PE, PP VE PVC granül üretiminin ilave edilmesinin planlandığı" hususları beyan ve taahhüt edilmiştir.

Bu bağlamda söz konusu faaliyet, Müdürlüğümüz teknik elemanları tarafından yapılan inceleme ve değerlendirme neticesinde, tesise ilave edilecek PE, PP VE PVC granül üretimi prosesi 25.11.2014 tarih ve 29186 sayılı Resmî Gazete'de yayımlanarak yürürlüğe giren "Çevresel Etki Değerlendirmesi (ÇED) Yönetmeliği" Ek-I ve EK-II listelerinde bulunmadığından 17.11.2006 tarih ve 2006-04-78-1589 karar nolu ÇED Gerekli Değildir Belgesinin geçerliliği, ilave proses için devam etmektedir.

Ancak, planlanan yatırım ile ilgili olarak, 2872 sayılı Çevre Kanunu ile 5491 sayılı Çevre Kanununda Değişiklik Yapılmasına Dair Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer mer'î mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine önelik tedbirlere riayet edilmesi gerekmektedir.

Bilgilerinizi ve gereğini rica ederim.

Aysen KÖMÜRÇÜ
İl Müdürü
İl Müdür Yardımcısı V.

Appendix D: Grievance Database

Grievance Database									
Reporting Period									
Name/Contact Details of Complainant	Internal/ External	Grievance Received by	Date Received	Details of Compliant/ Comment	Responsibility (Related Department)	Communication with complainant*	Actions taken	Date Resolved	Communication with complainant**
* Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 5 days that the grievance solution process has started.									
** Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.									

Appendix E: Grievance Closure Form

Grievance Closure Form	
Reference No:	
Determination of Corrective Action(s)	
1	
2	
3	
4	
5	
Responsible Departments	
Close Out the Grievance	
<i>This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.</i>	
Date: /...../.....	Name Surname / Signature of the Person Closing the Complaint
	Name, Surname / Signature of Complainant



Şehit Cevdet Özdemir Mah. Öveçler 4. Cad.,

1351. Sok., No:1/6-7, Çankaya/ANKARA

Tel: 0.312.479 84 00 (pbx), Faks: 0.312.479 84 99

www.mgsmuhendislik.com