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GEMLİK GÜBRE FERTILIZER INDUSTRY INC.

STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE REDRESS MECHANISM



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GEMLİK GÜBRE FERTILIZER INDUSTRY INC.

STAKEHOLDER ENGAGEMENT PLAN & GRIEVANCE REDRESS MECHANISM

PROJECT NO:

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ABBREVIATIONS

BUSEB	: Bursa Free Trade Zone
CLO	: Community Liaison Officer
CIMER	: Presidential Communication Center
DOKAY	: DOKAY-EIA Environmental Engineering
DSİ	: State Hydraulic Works
EIA	: Environmental Impact Assessment
GRM	: Grievance Redress Mechanism
HSE	: Health, Safety and Environment
IFC	: International Finance Corporation
MoEU	: Ministry of Environment, Urbanization and Climate Change
NGO	: Non-governmental Organization
OHS	: Occupational Health and Safety
OIZ	: Organized Industrial Zone
PDoEU	: Provincial Directorate of Environment and Urbanization
PIR	: Project Information Report
PS	: Performance Standards
QMS	: Quality Management System
SEP	: Stakeholder Engagement Plan
TKYB	: Development and Investment Bank of Turkey
WWTP	: Wastewater Treatment Plant

1 OBJECTIVE AND SCOPE

This Stakeholder Engagement Plan and Grievance Redress Mechanism (“SEP+GRM”) was prepared for the “Gemlik Gübre Fertilizer Inc.” (“Project Owner”) for operational activities of the fertilizer facility (“Project”).

TKYB requires the implementation of its own norms and some international standards along with the national environmental legislation during the construction and operation phases of the supported investments, and in this context; certain conditions must be fulfilled.

In this framework, TKYB has prepared an Environmental and Social Action Plan (“ESAP”) regarding the Project that is mentioned above. In accordance with the ESAP, the following reports will be prepared by DOKAY-EIA Environmental Engineering Co. (“DOKAY”).

- Air Quality and Greenhouse Gas Management Plan (“AQGMP”),
- Environmental and Social Monitoring Reports (“ESMR”)
- Hazardous Material Management Plan (“HMMP”),
- Occupational Health and Safety Management Plan (“OHSMP”) and Emergency Response Plan (“ERP”),
- Stakeholder Engagement Plan and Grievance Redress Mechanism (“SEP+GRM”).
- Water and Wastewater Management Plan (“WWMP”),

In this context, SEP+GRM, was prepared by considering the (i) national legislation, (ii) credit standards of Development Investment Bank of Turkey, (iii) International Finance Corporation (“IFC”) Performance Standards (“PSs”) and (iv) World Bank (“WB”) Environmental and Social Standards (“ESSs”).

The scope and main objectives of the SEP+GRM are listed below:

- Identification of the main and strategic stakeholders of the Project.
- Definition of the necessary approaches to ensure effective communication with identified stakeholders.
- Establishing mutual relations between Gemlik Gübre and the local communities and internal stakeholders.
- Ensuring that stakeholders are informed on time about the investments made, operational activities, and the possible environmental and social risks and impacts that may arise at these stages.
- Ensuring that the information and/or documents that are shared with the stakeholders are correct and clear.
- Identifying the methods and programs for consultation processes that will be conducted with the stakeholders and especially with the vulnerable groups during the operation phases.
- Ensuring that all interested parties are involved in the process.

- Helping the stakeholders by recording and resolving the grievances about the Project in case they have any.
- Ensuring that a redress mechanism will be established for helping the stakeholders by recording and resolving the grievances about the Project in case they have any, at a specific time.
- Identifying the roles and responsibilities regarding the implementation and application of SEP+GRM.

A site visit study was held on 19-20 July 2022 by DOKAY. During this site visit study, the project has been assessed in terms of the current stakeholder engagement program and grievance redress management in the Facility. Recordings regarding the grievances of the internal stakeholders have been investigated and meetings with the Project Management representatives have been held during the site visit studies. In addition, meetings with the Mukhtars (as representatives of the external stakeholders) in the region have been held.

Details regarding the stakeholder meetings will be given in the report with the complementary stakeholder engagement techniques and grievance redress mechanism policy.

All the meetings and site visit studies are held under the supervision of a sociologist who is a member of the site study team of DOKAY. Site study team members are given in Table 1-1.

The map that shows the satellite image and access roads of the Project Area which is located in Ata Neighborhood in Gemlik/Bursa is given in Annex-1.

Table 1-1: Site Visit Team of DOKAY

Name and Surname	Title
Deniz Çağlar	Environmental Engineer & OHS Expert (C Class)
Berat Batuhan Kaplangı	Environmental Engineer
Ali Tanrıverdi	Sociologist

2 PROJECT

2.1 Production Capacity and Location

The facility of the Gemlik Gübre Fertilizer Inc. is located in Ata Neighborhood of Gemlik District of Bursa. In accordance with the information obtained from the Capacity Report (approved by Union of Chambers and Commodity Exchanges of Turkey and valid till 12.05.2024) of the existing Fertilizer Facility, the products that are given in Table 2-1 are produced in a year.

Table 2-1: Production Capacity of the Existing Fertilizer Facility

Product	Amount
Calcium Ammonium Nitrate (CAN) N26-N27 Fertilizer	505,200,000 kg/year
Ammonium Nitrate (AN) N33-N34 Fertilizer	152,400,00 kg/year
Nitric Acid 100%	411,180,000 kg/year
Ammonia 99.9%	386,400,000 kg/year

A new Urea and UAN (Urea ammonium nitrate solution) Production Facility has been designed and construction of the new facility is proceeding. The construction phase of this new facility will finish on 15 March 2023. Urea and UAN Production Facility will lay out within the borders of the existing fertilizer facility.

The site location map that shows the existing facility and the construction area of the new facility is given in Figure 2-1.

The manufacturing of the products that are given in Table 2-1 is proceeding in the existing Fertilizer Facility. In addition, urea and UAN production will be accomplished within the borders of the Gemlik Gübre after the start-up of the new facility. During the operation phase of the urea and UAN production facility, 528,000,000 kg of product is planned to be produced in a year.

2.2 Project Milestones

Gemlik Gübre is one of the Yildirim Holding associations and was established in 1973, as a government enterprise. The company was bought by Yildirim Group following by government's decision of privatization and became an entity of Yildirim Holding in 2004. After the Yildirim group's investment, Gemlik Gübre became one of the major fertilizer producers in Turkey.

The existing facility was established before the first publication date of the Environmental Impact Assessment (EIA) Regulation, 07.02.1993, and in this context, it was exempted from the EIA Regulation.

In 2005, three temporary fertilizer storage tanks were built, and the "EIA is not necessary" decision has been made by the Ministry of Environment and Forestry (old name of the Ministry). The new name of the ministry that is the authority for the EIA assessments is the Ministry of Environment, Urbanization and Climate Change). The decision document is given in Annex-2.



Figure 2-1: Site Location Map

In 2018, the Environmental Impact Assessment Report of the new urea and UAN facility was prepared and presented to the Ministry of Environment and Urbanization, and the “EIA Positive” decision was obtained. The decision document is given in Annex-3.

Besides the new urea and UAN production facility, the existing facility is upgraded in accordance with the new technology. These upgrades are made by obtaining the opinions of the Ministry of Environment, Urbanization, and Climate Change. Opinion letter of the Ministry for the modernization works of the existing facility dated 08.06.2022 was obtained. In accordance with this opinion, there is not any additional action needed in terms of the environmental impact assessment.

The construction works of the new urea and UAN facility are proceeding. The construction works were started on 22.11.2020. The construction works within the borders of the Gemlik Gübre will be completed on 15.03.2023 and the operation phase of the new facility is planned to be initiated on 30.05.2023.

The timeline table of the Project is given in Table 2-2.

Table 2-2: Timeline Table

Date	Event
1973	Establishment of Gemlik Gübre
2004	Becoming an entity of Yıldırım Holding
2018	EIA Positive decision for the new Urea and UAN Facility
2023	Initiation of the operation phase of the new Urea and UAN Facility

2.3 Employment

In accordance with the information gathered during the site visit studies on 19-20 July 2022, there are 617 employees working in the existing facility. The statistical information (gender, white collar, blue collar etc.) of the employees are given in Table 2-3.

Table 2-3: Gemlik Gübre Employee Statistics

	White-Collar	Blue-Collar	Grey-Collar	TOTAL
Female	30	0	17	47
Male	81	429	60	570
	TOTAL			617

2.4 Descriptive Information on the Operations of the Project

In this section, explanatory information regarding the processes that are proceeding (and will be proceeded) during the operation phases of the Project will be given. In this regard, the official

“Environmental Impact Assessment (“EIA”) Report” of the Project and “Environmental Health and Safety Guideline for the Nitrogenous Fertilizer Production” which is prepared by IFC were used as references.

2.4.1 General Information

Ammonia-based nitrogenous fertilizers manufacturing activities in Gemlik Gübre include the production of ammonia (NH_3), nitric acid (HNO_3), ammonium nitrate (AN), calcium ammonium nitrate (CAN), urea and mixed nitrogen fertilizers, such as urea compounds; urea ammonium nitrate (UAN) liquid fertilizers.

2.4.2 Ammonia Unit

Natural gas reforming with steam and air is the simplest and most effective method used to produce ammonia synthesis gas and is used by the Gemlik Gübre.

Ammonia production from natural gas includes the following process steps: removal of trace quantities of sulfur in the feedstock; primary and secondary reforming, carbon monoxide shift conversion, removal of carbon dioxide, methanation, compression, ammonia synthesis, and ammonia product refrigeration. Carbon is removed in the form of concentrated CO_2 , which can be used for urea manufacture or other industrial purposes to reduce its release to the atmosphere.

The Ammonia Unit is located on an area of 75,000 m^2 in the Project Area. Natural gas, the main raw material of ammonia production, is provided by BOTAŞ. Raw water is supplied from Lake Iznik and the air is supplied from the atmosphere.

2.4.3 Nitric Acid Unit

The Nitric Acid Unit is located on an area of 2,535 m^2 in the Facility. In this unit, 55% of Nitric Acid production processes are carried out.

Nitric acid is used as an intermediate in the manufacture of ammonium nitrate (NH_4NO_3), which is primarily used in to manufacture fertilizers.

The production stages for nitric acid manufacture include the following: vaporizing liquid ammonia; mixing the vapor with air and burning the mixture over a catalyst; cooling the resulting nitric oxide (NO) and oxidizing it to nitrogen dioxide (NO_2) with residual oxygen; and absorbing the nitrogen dioxide in water in an absorption column to form nitric acid.

2.4.4 Ammonium Nitrate (AN) and Calcium Ammonium Nitrate (CAN)

This unit is located on an area of 38,740 m^2 . In this unit, 26% and 27% Nitrogen Calcium Ammonium Nitrate and 33% and 34% ammonium nitrate production processes are carried out.

Ammonium nitrate (AN) is used extensively as a nitrogenous fertilizer, although it is also used as an explosive. Ammonium nitrate is produced by the reaction between gaseous ammonia and aqueous nitric acid. The production process comprises three main unit operations: neutralization, evaporation, and solidification (prilling and granulation).

Calcium ammonium nitrate or CAN, also known as nitro-limestone or nitrochalk, is a widely used inorganic fertilizer. It is manufactured by mixing molten Ammonium Nitrate and Calcium Carbonate in the mixing tank at high temperature.

2.4.5 Urea and UAN Production

Urea is a source of Nitrogen (N), an essential nutrient crucial for crop growth and development. Urea is the most important nitrogenous fertilizer because of its high N content.

The synthesis of urea involves the combination of ammonia and carbon dioxide at high pressure to form ammonium carbamate, which is subsequently dehydrated by the application of heat to form urea and water.

Urea Ammonium Nitrate (UAN) solution, produced by combining urea, nitric acid, and ammonia, is a liquid fertilizer product with a nitrogen content that typically ranges from 28 percent to 32 percent.

UAN can be applied more uniformly than non-liquid forms of fertilizer. It can be mixed with herbicides, pesticides, and other nutrients, enabling farmers to reduce costs by applying several materials simultaneously rather than making several separate applications.

2.4.6 Contributions of the Facility

As mentioned in “2.4.2 Ammonia Unit”, CO₂ is released during the production of ammonia. With the realization of the project, CO₂ gas will be used as raw material. In this context, an environmental contribution will be provided by recycling carbon dioxide.

Due to the fact that industry and settlement are located in the same place in Gemlik, the storage of ammonia in the tanks creates extra storage efforts and extra risk in terms of the earthquake potential in the region even if all precaution against the earthquake risk has been taken. By the establishment of the new facility, the ammonia produced will be used in urea production, and the storage of the ammonia will be significantly reduced.

It is expected that the use of all ammonia produced for production purposes in the new facility will be more beneficial for Turkish agriculture and farmers, eliminating the high import-based costs and faster access to high-quality fertilizers, thus reducing foreign dependency.

The operation phase of the Project contribute to the employment rate in the region. In 2021, Project management provided "beginning-to-work training" to 125 people regarding "the ammonium nitrate fertilizer manufacturing" profession and contributed to local employment. In this context, the Project Management worked together with the "Bursa Provincial Directorate of Labor and Employment Agency-Gemlik Service Center". In this regard, the informative letter prepared by the General Directorate of the Turkish Employment Agency is shared in Annex-4.

Opinions of the local representatives related to the contribution of the Gemlik Gübre to local employment will be given in the following sections of this report.

General layout plan of the units of the Gemlik Gübre Facility is given in Figure 2-2.

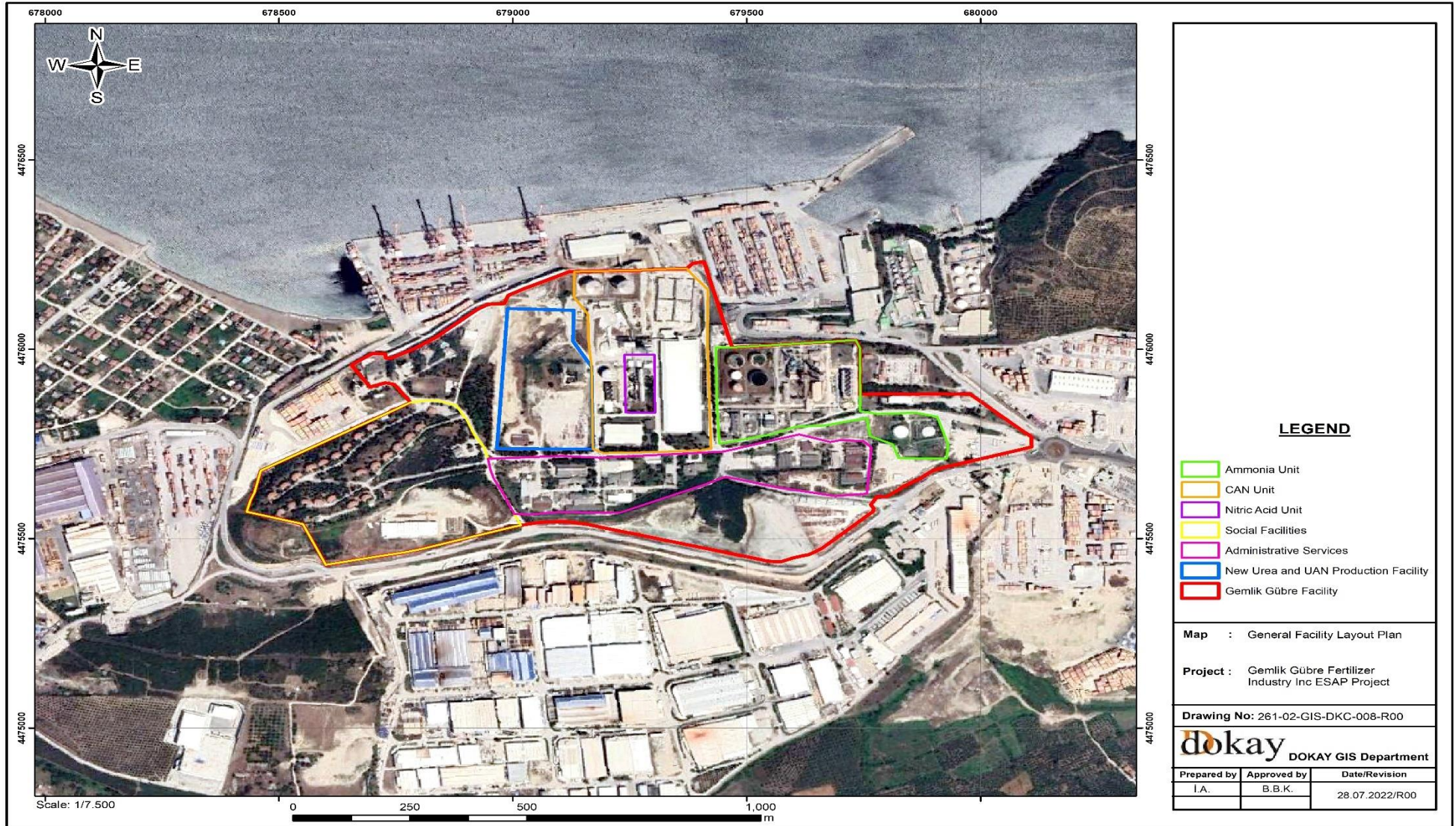


Figure 2-2: General Layout Plan of the Facility

3 LEGAL FRAMEWORK AND INTERNATIONAL STANDARDS

During the stakeholder engagement process of the Project, in addition to the national legislation, Performance Standards (“PS”) established by the International Finance Corporation (“IFC”) and all policies, standards, plans, and procedures created by Gemlik Gübre will be taken into account. Information about the aforementioned national and international legal regulations is given in the following sections as subtitles.

3.1 National Legislation and Official Grievance Channels

3.1.1 The Constitution of the Republic of Turkey

The Constitution of the Republic of Turkey (Law Numbered:2709; Date of Ratification: 07.11.1982), consists of the necessary regulations that should be taken as a basis for the stakeholder engagement components. The Constitutional provisions regarding the stakeholder engagement issues are listed below.

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 disclose their thoughts and opinions; cannot be condemned and accused of their opinions.

Freedom of Explaining and Spreading Thought (Article 26):

Everyone has the right to express and disseminate their thoughts and opinions, either alone or collectively, by word, text, picture, or other means. This freedom includes the freedom to receive or give news or ideas without the interference of official authorities.

Health, Environment and Housing (Article 56):

Everyone has the right to live in a healthy and balanced environment. It is the duty of the state and citizens to improve the environmental quality, protect environmental health and prevent environmental pollution. The state ensures that everyone lives their lives physically and mentally healthy; it regulates the planning and service of health institutions from a single source to realize cooperation by increasing savings and efficiency in human and substance power. The state fulfills this task by utilizing and supervising the health and social institutions in the public and private sectors.

3.1.2 Right to Information Act

The Right to Information Act (Law No: 4982), published in the Official Gazette dated 24.10.2003 and numbered 25269, regulates the principles and procedures regarding the act of the right to information in accordance with the principles of equality, impartiality, and openness required by a democratic and transparent administration. In accordance with Article 4 of Section Two, everyone has the right to get information.

3.1.3 Law on Exercise of the Right to Petition

The Law on the Exercise of the Right to Petition (Law No: 3071) entered into force through the Official Gazette dated 10.11.1984 and numbered 18571. The law aims to regulate the way of

implementing a right of making written applications to the Grand National Assembly of Turkey and competent authorities from Turkish citizens and foreigners residing in Turkey about their wishes and complaints about themselves or the public.

In accordance with Article 3 of the Law on the Exercise of the Right to Petition, Turkish citizens shall have the right to make written applications to the Grand National Assembly of Turkey and competent authorities about the wishes and complaints related to themselves or the public.

3.1.4 Environmental Impact Assessment Regulation

Environmental Impact Assessment Regulation (Official Gazette dated 25.11.2014 and numbered 29186) presents the legal framework about the public participation meetings which are the important constituents of environmental impact assessment ("EIA") process.

The EIA requirements depend on a facility's size, capacity, type, and possible impacts on the environment. Some project owners must directly apply for an "EIA Out of Scope" decision. Some other projects are subject to a selection and elimination criteria based on the technical qualification, use of natural resources, amount of waste, and accident risks of the project, which may result with either an "EIA Not Required" decision or an "EIA Required" decision. Those that obtain an "EIA Required" decision must apply for an "EIA Positive" decision.

During selection and elimination process, project owner prepares a report named "Project Introduction Report (PIR)" and presents it to the Ministry of Environment, Urbanization and Climate Change (Ministry) for determining whether "EIA is Required" for the Project or not. If EIA is required for a project, necessary studies are accomplished to complete the environmental impact assessment of the Project; one of them is the public participation studies.

Public participation meeting is held as a legal requirement before determining the scope and special format for the projects subject to the EIA process. Accordingly, in EIA Regulation Article 9, the provision "to inform the public about the investment and to receive their opinions and suggestions regarding the project; The Public Participation Meeting is organized in a central place that is accessible for the local people which is determined by the governorship, at the date and time determined by the Ministry, with the participation of organizations qualified by the Ministry of Environment, Urbanization and Climate Change and the project owner." takes place.

During the review and assessment meetings, reviews and evaluations are made by the Commission on whether there is a solution to the opinions and suggestions raised by the local people and the society during the public participation meeting and other stages of the process.

The EIA Report, which is reviewed and finalized by the Commission, is opened for publication by the Ministry and/or the governor's office for ten calendar days to receive public opinion and suggestions. In the decision-making process related to the project, Ministry also evaluates the opinions received at this stage.

In this context, if a deficiency is found in the content of the report in line with the opinions of the public, it may be requested to complete these deficiencies, to carry out additional studies, or to re-gather the commission.

Afterward, the "EIA Positive" or "EIA Negative" decision is made about the project and is announced to the public by the Ministry and the relevant Governorship through a written announcement and official website.

The existing facility was established before the first publication date of the Environmental Impact Assessment (EIA) Regulation, 07.02.1993, and in this context, it was exempted from the EIA Regulation.

In 2005, three temporary fertilizer storage tanks were built, and the "EIA is not necessary" decision has been made by the Ministry of Environment and Forestry (old name of the Ministry. The new name of the ministry that is the authority for the EIA assessments is the Ministry of Environment, Urbanization and Climate Change).

In 2018, the Environmental Impact Assessment Report of the new urea and UAN facility was prepared and presented to the Ministry of Environment and Urbanization, and the "EIA Positive" decision was obtained.

3.1.5 Official Grievance Channels

In accordance with the Law on Exercise of Right to Petition, stakeholders can inform their requests, suggestions and grievances related to Project by making application from Presidential Communication Center ("CIMER") which is operating under Presidency of Communication. Stakeholders can submit their applications through the CIMER internet address (<https://www.cimer.gov.tr>) or by calling the Alo 150 Direct Presidency line.

Similarly, grievances and/or suggestions regarding the activities within the scope of the Project can be made by filling the contact forms on the websites of Bursa Municipality and Gemlik Municipality as well as the Provincial Directorate of Environment, Urbanization and Climate Change. Contact information of the relevant governmental institutions and municipalities are presented in Table A3-1 in Annex-5.

3.2 International Standards

World Bank Standards

During the implementation of the stakeholder engagement plan during operation phase of the Project, the following objectives that are identified in the "World Bank Environmental and Social Standard 10 (ESS10)- Stakeholder Engagement and Information Disclosure" will be aimed to be accomplished.

- To establish a systematic approach to stakeholder engagement that will help identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
 - To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.

- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format.

IFC Standards

IFC PS1 sets out the general framework for stakeholder engagement and the establishment of a Grievance Redress Mechanism. According to IFC PS1, stakeholder involvement is essential to establish strong, constructive, and responsive relationships which are necessary to successfully manage the environmental and social impacts of a project.

Stakeholder engagement is a continuous process. Stakeholder engagement consists of analyzing and planning stakeholders, informing the stakeholders, providing consultation and participation, establishing a Grievance Redress Mechanism, and providing continuous information and reports to affected communities, although their degree of impact varies.

Although the types, frequency and level of effort of stakeholder engagement vary considerably, the activities to be carried out in this context should be commensurate with the stage (such as construction, operation) and possible risks and potential negative impacts.

The main requirements for the stakeholder engagement process in accordance with international standards are as follows:

- Identification of stakeholders.
- Sharing the necessary information with the communities affected or likely to be affected by the Project due to the activities during the construction and operation phases of the Project.
- Preparing and implementing a grievance mechanism.

Similarly, “Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Developing Countries” prepared by IFC defines the main components of the stakeholder engagement process as follows:

- Analysis of the stakeholders and planning their participations.
- Information sharing, reporting to stakeholders and consultations.
- Negotiations and partnerships.
- Participation of the stakeholders to the project follow-up.
- Grievance management.
- Other management functions.

4 ROLES AND RESPONSIBILITIES

Gemlik Gübre will take full responsibility, including the organization of the entire process within the scope of stakeholder engagement and grievance redress mechanism, ensuring communication with stakeholders, receiving requests and/or grievances from stakeholders, and responding to these requests and grievances. The general duties and responsibilities determined for the effective implementation of the stakeholder engagement process and the grievance redress mechanism are presented in Table 4-1.

Table 4-1: Roles and Responsibilities within the scope of SEP Applications

Roles	Duties and Responsibilities
Project Management	<ul style="list-style-type: none">• Ensuring that sufficient resources are allocated to effectively implement the SEP and GRM during the operation phase of the Project.• Ensuring that grievances and/or suggestions from external and internal stakeholders are collected, recorded, and responded.• Ensuring effective and regular communication with the stakeholders• Organizing stakeholder engagement meetings and interviews.• Sharing information regarding the Project.• Conducting consultation activities
Community Liaison Officer (CLO)	<ul style="list-style-type: none">• Providing information and/or reporting to the Project Manager about the practices of the SEP and the GRM.• Reviewing the grievance database regularly.• Reviewing grievances from stakeholders and responding to incoming grievances with reasonable timing.• Ensuring the application of SEP by subcontractors.• Ensuring that internal grievances are recorded and responded.• Providing trainings to Gemlik Gübre employees and subcontractors on practices under the SEP and GRM.

In addition to CLO in Gemlik Gübre, environmental engineers and OHS experts shall join the stakeholder engagement programs and grievance redress mechanism in coordination with the community liaison officer.

When a grievance is received, CLO decides the responsible unit for redressing the grievance and act accordingly.

5 IDENTIFICATION OF STAKEHOLDERS

Individuals, groups, and institutions/organizations that are affected by the project activities and performance or can affect these processes or have a legal relationship with the Project are considered stakeholders.

Identifying stakeholders in the early stages of the Project is a key step in the stakeholder engagement process. The main purpose of identifying stakeholders is to give priority to the people, groups, and institutions by defining those people, groups, and institutions that may be directly or indirectly affected by the Project and may be related to the Project. In this framework, individuals and groups that may be affected by the Project have special importance due to their disadvantages and/or vulnerability.

Stakeholders determined within the scope of the Project are presented in Table 5-1. Among these stakeholders, stakeholders except the Company Group are evaluated as External Stakeholders. In addition, within the scope of the Project, Civil Society Organizations, Universities, and Media are defined as indirect stakeholders; while, Local Communities, Government Institutions and Organizations, Local Government Organizations, Neighboring Facilities, Credit Institutions, and Company groups are determined as primary stakeholders (direct stakeholders).

Table 5-1: Stakeholder Groups Determined within the Scope of the Project

Stakeholder Group	Stakeholders	Relation with the Project
Ecosystem	<ul style="list-style-type: none"> • Flora and fauna species in the Project Area and its immediate surroundings 	<ul style="list-style-type: none"> • Protection and monitoring of biodiversity elements in the Project Area and its immediate surroundings during the activities to be carried out during operation phase of the Project.
Government Institutions and Organizations	<ul style="list-style-type: none"> • Ministry of Environment, Urbanization, and Climate Change • Energy and Natural Resources Ministry • Ministry of Agriculture and Forestry • General Directorate of Nature Conservation and National Parks • Ministry of Family, Labor, and Social Services • Ministry of Transportation and Infrastructure • Ministry of Health • Ministry of Culture and Tourism • Ministry of Treasury and Finance • The Union of Chambers of Commodity Exchanges • The Union of Chambers of Turkish Engineers and Architects • State Hydraulic Works (DSİ) • TEİAŞ 	<ul style="list-style-type: none"> • Policy making • Permits and licenses that should be taken within the scope of the project • Protection of the health and safety of employees and their local communities • Protection of the environment • Protection of cultural heritage • Protection of biological diversity • Permits that should be taken regarding the land usage • Obtaining the necessary permissions on issues related to transportation • Operation and maintenance of the Infrastructure Services and Energy Transmission Lines • Prevention of the spread of infectious diseases and protection of public health
Local Government Organizations	<ul style="list-style-type: none"> • Bursa Governorship Provincial Directorate of Environment, Urbanization and Climate Change 	<ul style="list-style-type: none"> • Getting the necessary permissions within the scope of the project

Stakeholder Group	Stakeholders	Relation with the Project
	<ul style="list-style-type: none"> Bursa Governorship Provincial Directorate of Agriculture and Forestry Bursa Cultural Heritage Conservation Regional Board Directorate Bursa Provincial Health Directorate Bursa Municipality Gemlik Municipality Bursa Provincial Gendarmerie Command Ata Neighborhood Mukhtar Office Engürücük Neighborhood Mukhtar Office 100. Primary School Management Gemlik District Directorates of the Ministries 	<ul style="list-style-type: none"> Managing project environmental impacts (such as waste and wastewater) and environmental audits Permits that should be taken regarding the land usage Prevention of the spread of infectious diseases Protection of workers health and public health and safety Protection of the local people health and safety Consultation on the procedures to be done for the protection of cultural assets in case of incidental finding Communication in case of an emergency Safety
Neighboring Facilities	<ul style="list-style-type: none"> BP(Castro) BORUSAN Çimtaş BUSEB Gemport 	<ul style="list-style-type: none"> Co-operation in case of any emergency. Managing the grievances related to the cumulative effects of the neighboring facilities.
University	<ul style="list-style-type: none"> Bursa Technical University Bursa Uludağ University 	<ul style="list-style-type: none"> Getting technical support when it is necessary is optional.
Professional Chambers	<ul style="list-style-type: none"> Chamber of Environmental Engineers Chamber of Chemical Engineers Chamber of Agricultural Engineers 	<ul style="list-style-type: none"> Negotiations and technical support on environmental and social impacts, economic development and employment issues
Credit Institutions	<ul style="list-style-type: none"> International Financial Institutions and Private Banks (TKYB and international resources associated with TKYB) 	<ul style="list-style-type: none"> Project Finance
Media	<ul style="list-style-type: none"> Local and national newspapers (Local newspapers: Gündem, Körfez, Manşet, Haber) Social Media 	<ul style="list-style-type: none"> Information sharing and advertising studies about the Project
Company Group	<ul style="list-style-type: none"> Project employees Subcontractors 	<ul style="list-style-type: none"> Project Environmental and Social Management System applications Employment Workforce and management

Contact information of the primary stakeholders is shared in Table A3-1 and Table A5-1 in Annex-5. Map showing the neighboring facilities is given in Figure A5-1 and another map showing the locations where local people are living, and spent their time mostly (sensitive receptors) are given in Figure A5-2 in Annex-5.

Gemlik Gübre provides all the necessary information related to the stakeholders and defines all the communication ways with the stakeholders in the scope of the stakeholder engagement plan. Gemlik Gübre will maintain the engagement of the identified stakeholders by using the information-sharing methods and grievance redress mechanisms that are mentioned in the following sections.

6 INFORMATION TOOLS AND METHODS

Sharing information regarding the Project helps local communities and other stakeholders understand the opportunities as well as the risks and impacts associated with the project. In this way, stakeholders are ensured to have access to information such as (i) The purpose, feature, and scale of the Project; (ii) duration of the project activities; (iii) risks and potential impacts on the communities and mitigation measures taken against them; (iv) the envisaged stakeholder engagement process; and (v) grievance redress mechanism.

Gemlik Gübre will use communication tools such as media, corporate web site, brochure, information notes, correspondences, announcements, regular meetings, face to face interviews and other informative activities to make consistent and transparent and timely informing to the local communities, company employees and other stakeholders. In this context, Gemlik Gübre shares up-to-date information and documents related to the environmental and social aspects of the Project on its corporate website (see: <https://www.gemligubre.com.tr/Sayfa-65-cevre-ve-sosyal-etki-degerlendirme.html>).

Documents such as Environmental and Social Action Plan, SEP, Grievance Redress Mechanism etc. prepared for the Project will be kept on that website. In addition, Gemlik Gübre website contains materials that provide information about the different stages of the Project, and stakeholders are constantly informed about the Project on the website.

When stakeholders are exposed to risk and negative impacts due to the activities under the Project, a consultation process will be carried out to ensure that stakeholders express their views, and the Project Owner can respond by evaluating these views. The consultation process will be commensurate with the project risks, negative impacts and concerns raised by the stakeholders. The issues listed below will be considered for an effective consultation process:

- The consultation process will be initiated during the operational phase where environmental and social risks and impacts are determined and will be repeated as risks and impacts occur.
- The information shared during the consultation process will be transparent, objective, meaningful and easily accessible in a simplified, appropriate format that local communities can understand.
- The consultation process will focus on the groups that are directly affected by the Project (especially internal stakeholders) rather than indirectly affected stakeholders.
- In order to manage the process well, it will be ensured that there is no external orientation, intervention and compelling.
- Outputs related to this process will be recorded.

In case of any grievances from stakeholders, Gemlik Gübre will respond to the demands, comments, and questions of local communities implicitly and in time by implementation of the grievance redress mechanism. All requests will be treated by having respect. When it is not possible to fulfill a specific request, stakeholders will be given a detailed explanation of why this is not possible, with the help of social plans. Details are given in the next section.

7 GRIEVANCE REDRESS MECHANISM

A Grievance Redress Mechanism will be established within the scope of the Project in order to learn about the concerns and grievances of employees and external stakeholders regarding the environmental and social performance of the Project and to help them eliminate their complaints. In this process, possible risks and possible negative impacts of the Project were taken into consideration.

The Grievance Redress Mechanism aims to promptly address the concerns that stakeholders may have, using a culturally appropriate, transparent, and clear consultation process. The party expressing its concern or grievance will not face any cost or sanction.

The Grievance Redress Mechanism does not constitute an obstacle to resorting to legal or administrative remedies. Stakeholders and affected communities will be informed about the Grievance Redress Mechanism during the stakeholder engagement process.

In order to effectively implement the Grievance Redress Mechanism, the general steps given below should be followed:

- Grievance Redress Mechanism is prepared by taking into consideration the environmental and social risks and possible impacts of the Project.
- The process should be design in a way that it is easily clear, accessible, confidential, and appropriate in cultural manners.
- Employees and external stakeholders will be provided with information about where, to whom and how to deliver their grievances.
- A response time related to incoming grievances will be determined (for example 15 days) and this time will be adhered to.
- By giving feedback to local communities, employees and other stakeholders, the actions taken regarding their concerns and grievances and the results of these actions will be explained.
- Necessary records will be kept regarding all transactions and reported to TKYB during the environmental and social monitoring studies.

Internal and external grievances will be collected, recorded, and, evaluated as the way it is stated below:

- Upon the receipt of the grievances by CLO, the process will be initiated by the Project Management, OHS Expert or Environmental Engineer, depending on the type of grievance.
- Incoming grievances will be recorded in the database and reported to TKYB during the environmental and social monitoring studies.
- The grievance will be directed to the relevant department and a preliminary assessment will be made on the subject.

- Actions and measures necessary for the resolution of the grievance will be determined and implemented.
- If the grievance owner has indicated the name and contact information in the grievance forms and the level of the importance of the grievance is “High” (effects the health and safety of the internal and external stakeholders), he/she will be informed within at most seven workdays after the initiation of the redress process. Otherwise, the person making the grievance will be informed within 15-25 workdays.
- After the grievances are redressed by reaching an agreement with the grievance owner, the grievance will be closed by the CLO.
- If the grievances cannot be redressed within a specified time for a reason, the parties making the grievance will be informed and information about the time extension will be provided.
- SEP+GRM Report should be uploaded to the webpage of Gemlik Gübre.
- Grievance/suggestion form should be placed in the security points at the entrance of the Facility in order for being used by internal stakeholders.
- Information about the locations of the grievance/suggestion boxes and how to convey their grievances will be provided to the stakeholders.
- Grievances form is given in Annex-6. Grievances may be sent to the Project Management via this link as well: <https://www.gemlikgubre.com.tr/Sayfa-34-oneri-sikayet.html>.

In accordance with the subject of the grievance, necessary actions will be taken by the relevant unit or staff of Gemlik Gübre. A grievance may be handled by the environmental engineer, OHS Specialist, Human Resources Expert, or other units related to the subject of the grievance.

Employees and external stakeholders should know who and how to contact in case of suggestions, requests, and grievances. In this context, responsible parties should also have detailed information about the Grievance Redress Mechanism’s operation and related procedures. Notice boards, e-mails, brochures, and recruitment training programs should also include information and sessions on the stakeholder engagement plan and grievance redress mechanism in order to increase awareness regarding this context.

Internal grievances that will possibly come from employees will be received as the way summarized below:

- All Project employee and field workers (including subcontractors) will be informed about the Grievance Redress Mechanism;
- The operation of the Grievance Redress Mechanism and the stakeholder engagement process will be included in the OHS trainings that will be repeated periodically during the operation periods of the Project;

- In order to receive internal grievances, grievance/suggestion boxes will be placed at places of the Project Site where employees can easily reach. In areas where there are grievance/suggestion boxes, no image will be taken with the camera.

The following practices will be implemented in order to receive grievances and/or suggestions from local communities and other external stakeholders:

- Detailed information about the Grievance Redress Mechanism will be given in the stakeholder engagement meetings and interview.
- With the external grievance form, applications through the website can be received (<https://www.gemlikubre.com.tr/Sayfa-34-oneri-sikayet.html>.)
- Information about the locations of the grievance/suggestion forms and how to convey their grievances will be provided to stakeholders during the stakeholder meetings.

The Grievance Redress Mechanism flow chart is shown in Figure 7-1.

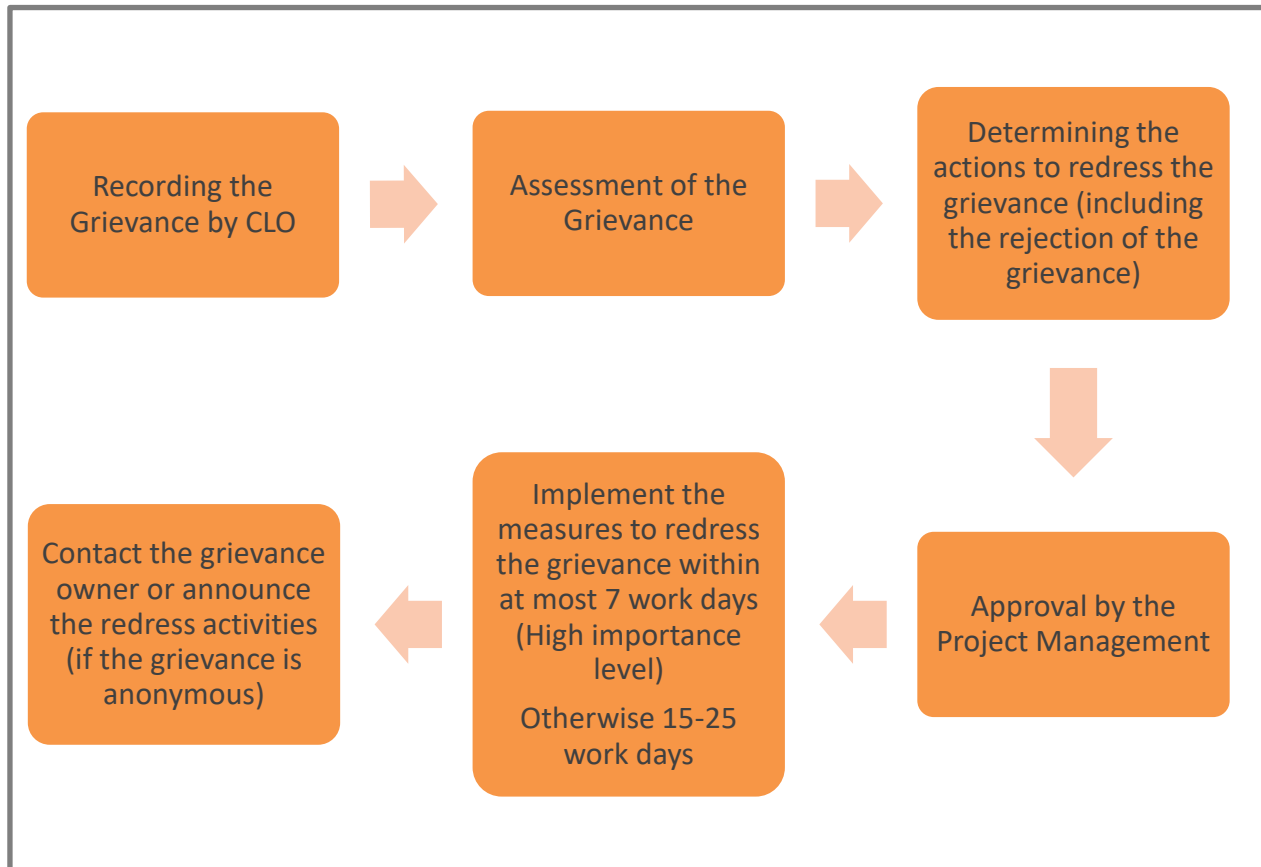


Figure 7-1: Flow Chart of the Grievance Redress Mechanism

8 MONITORING, REPORTING AND TRAINING

The stakeholder engagement process and the grievance redress mechanism will be regularly reviewed by Gemlik Gübre during the Project the operation phase, and practices carried out in this context will be monitored. In addition, the feedback from stakeholders will be evaluated and stakeholders will be involved in the monitoring processes. During the monitoring activities, stakeholders will be questioned about the following items.

- Transparency of the accession process.
- Whether the information about the Project is provided or not.
- Whether grievances are answered in a timely manner.
- The clarity, applicability, and validity of the shared information.

In the process of monitoring the effectiveness of Stakeholder Engagement and Grievance Redress Mechanism, key performance indicators should be determined, and monitoring activities should be based on those indicators.

Performance indicators will be monitored through grievance registrations and reports. In this context, the performance indicators applicable for the Project are listed below:

- A decrease to be seen in the number of grievances coming from the stakeholders.
- Providing regular feedback to stakeholders on the implementation of the Grievance Redress Mechanism and closed cases.
- Number of resolved grievances.
- Conducting regular audits to ensure that the Grievance Redress Mechanism is implemented.

Compliance with the SEP and GRM will be periodically audited by Gemlik Gübre management, TKYB and associated international institutions. Subcontractors will also be regularly audited by Gemlik Gübre in line with Project Standards and SEP+GRM requirements. In this process, regular records will be kept on the issues listed below:

- Consultation meetings.
- Stakeholder interviews.
- Internal and external suggestions/grievances received, and studies carried out in this context.
- Correspondences and informative studies (brochures etc.)
- Audit and monitoring reports.

9 STAKEHOLDER ENGAGEMENT PROGRAM

The purpose of the stakeholder engagement is to ensure continuous communication with the stakeholders for giving information about the activities to be conducted in the operation phase. Information to be shared with the stakeholders during the stakeholder engagement process, communication methods and tools to be used, stakeholder groups, and responsible people are presented in the program in Table 9-1.

A site visit was held on 19-20 July 2022 and information on the internal and external stakeholders are obtained from the Project Management. In this regard, a meeting was held in Gemlik Gübre Facility in order to share information regarding the current stakeholder engagement applications.

During the site visit studies, recordings of the current stakeholder engagement applications of the Project were investigated. Internal and external stakeholder engagement actions and grievance recordings were assessed.

In addition to these, stakeholder interviews were held with the representatives of the external stakeholders. An environment where stakeholders can easily express their concerns was provided at the meetings. Questions from stakeholders were answered and comments specified were recorded.

Remarks related to the internal and external stakeholder engagement will be given in the next section.

Regular consultations and meetings will be held to involve the project employees and subcontractors in the stakeholder engagement process, to inform the employees about the progress of the Project, to transfer the internal grievance mechanism, and to get the opinions of the employees.

The stakeholder engagement program will be reviewed and revised based on the project performance requirements and feedback from stakeholders.

Table 9-1: Stakeholder Engagement Program

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents to be used during the Stakeholder Engagement	Communication Tools and Methods	Responsible
Company Group	• Operation phases	<ul style="list-style-type: none"> Regular meetings which will be conducted monthly periods for evaluating the grievances and suggestions. In case of any grievance and/or suggestion from employee. Yearly interviews with the employees in the scope of environmental and social monitoring. 	<ul style="list-style-type: none"> Environmental and Social Action Plan Stakeholder Engagement Plan Grievance Redress Mechanism and Grievance Forms (Internal Grievances) Awareness raising studies and trainings Training documents OHS procedure and plans Procedure and plans on the management of environmental impacts Project schedule and planning Annual activity reports 	<ul style="list-style-type: none"> Regular meetings Correspondence and phone calls Workforce audits / revision studies OHS meetings Internal Grievance Forms Grievance boxes and information notes in the Project Site 	<ul style="list-style-type: none"> Project Management CLO OHS Specialist Environmental Engineer Contractors and subcontractors
Government Institutions and Organizations / Local Government Organizations	• Operation phases	<ul style="list-style-type: none"> When permission is required from the governmental institutions/organizations within the scope of the Project When it is necessary to apply governmental institutions/organizations within the scope of the Project In case of supervision by governmental institutions/organization In case of grievances and/or suggestions from government institutions/organizations 	<ul style="list-style-type: none"> Project schedule and planning Annual activity reports Documents required within the scope of permits to be obtained 	<ul style="list-style-type: none"> Company web site Correspondence and phone calls 	<ul style="list-style-type: none"> Project Management CLO OHS Specialist Environmental Engineer Contractors and subcontractors

Stakeholder Groups	Project Stage	Communication Frequency	Information/Documents to be used during the Stakeholder Engagement	Communication Tools and Methods	Responsible
Universities	• Operation phases	• When consultancy on technical issues is required within the scope of the Project	• Technical information about the Project	• Correspondences	• Project Management • CLO
Civil Society Organization (CSO)	• Operation phases	• If necessary • In case of grievances and/or suggestions from CSOs	• Environmental and Social Action Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms	• Company web site • Informative notices and brochures • Correspondence and phone calls • Grievance Forms	• Project Management • CLO
Credit Institutions	• Operation phases	• During the annual Monitoring Meetings with credit institutions during the construction and operation periods of the Project • In case of need to share information/documents about the Project	• Environmental and Social Action Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms • Environmental monitoring reports about the Project • Annual activity reports on the environmental and social performance of the Project	• Company web site • Regular meetings • Correspondence and phone calls • Grievance Forms	• Project Management • CLO • OHS Specialist • Environmental Engineer • Contractors and subcontractors
Neighboring Facilities and Local People	• Operation phases	• Regular meetings and interviews • In case of any grievances and/or suggestions from the management of the facilities.	• Environmental and Social Action Plan • Stakeholder Engagement Plan • Grievance Redress Mechanism and Grievance Forms	• Company web site • Informative notices and brochures • Workshops • Correspondence and phone calls • Grievance Forms	• Project Management • CLO • OHS Specialist • Environmental Engineer • Contractors and subcontractors

10 SITE VISIT STUDY

A site visit was held on 19-20 July 2022 in order to prepare the plans and reports that are defined in the environmental and social action plan of the Project. These plans and reports are given below.

- Water and Wastewater Management Plan (“ENMP”),
- Occupational Health and Safety Management Plan (“OHSMP”) and Emergency Response Plan (“ERP”),
- Air Quality and Greenhouse Gas Management Plan (“BMP”),
- Hazardous Material Management Plan (“HMMP”),
- Stakeholder Engagement Plan and Grievance Redress Mechanism (“SEP+GRM”).
- Environmental and Social Monitoring Report (“ESMR”)

On the first day of the site visit, an opening meeting was held with the participation of the Gemlik Gübre Project management representatives. The meeting was held in the Facility. During this meeting, Gemlik Gübre representatives were informed about creating the mentioned plan and reports. In addition to environmental and social subjects, the current situation of the stakeholder engagement and grievance redress mechanism in the Facility was investigated. The participants of the meeting are given in Table 10-1.

Table 10-1: Site Visit Opening Meeting Participants

Participants	
Name & Surname	Position
Ceyda Şener Karadağ	Gemlik Gübre Inc. HSSE Manager
İlker Gürel	Gemlik Gübre Inc. Production Director
Aylin Erkul	Gemlik Gübre Inc. Human Resources Director
Ercüment Ülker	Gemlik Gübre Inc. Financial Affairs Director
Muhittin Aydoğdu	Gemlik Gübre Inc. Chief of Security and Administrative Affairs
Semih Şahin	Gemlik Gübre Inc. HSE Assistant Manager
Recep Balande	Gemlik Gübre Inc. HR Chief
Yakup Topaloğlu	Gemlik Gübre Inc. Fertilizer Production Assistant Manager
Ersin Paksoy	Gemlik Gübre Inc. Ammonia Production Eng.
Mustafa Özkan	Gemlik Gübre Inc. Env. Eng.
İlkay Doğu	Gemlik Gübre Inc. OHS Expert
Ecem Şener	Gemlik Gübre Inc. CLO
Deniz Çağlar	DOKAY- Environmental Engineer and OHS Expert
Ali Tanrıverdi	DOKAY- Sociologist
Berat Batuhan Kaplangı	DOKAY- Environmental Engineer

During the site visit studies, current stakeholder engagement applications in the facility have been identified. Project Management representatives have been reported that the facility was audited in terms of the SA8000:2014 Standards. SA8000 measures social performance in elements important to social accountability in workplaces, anchored by a management system elements that drives continuous improvement in all areas of the Standard. These elements are;

- Child Labor
- Forced or Compulsory Labor
- Health and Safety
- Freedom of Association and Right to Collective Bargaining
- Discrimination
- Disciplinary Practices
- Working Hours
- Remuneration
- Management System

The audit was held on 21-22-23 December 2021 by Inspecco and it was reported in the audit report that all the elements that are controlled during the inspection were graded as satisfactory/appropriate with only one minor non-compliance. This minor non-compliance is identified as “The toilets are far from the work area where the cooling tower is located. In the working area where the 2001 K transformer is located, toilets are insufficient. Toilets, showers, and lockers were insufficient for the workers (64 people) in the maintenance area. A new maintenance area is under construction and some of the employees will be transferred there when the construction is completed.” in the audit report.

In addition to the SA8000 studies, the CLO of the Project manages the internal and external stakeholder engagement plan and grievance redress mechanism in the Facility. It was reported by the CLO of the Project that there are 8 suggestion/comment/complaint boxes within the borders of the facility that staff can reach these boxes and share their comments, suggestions, or complaints regarding the project easily. She mentioned that boxes are placed where any camera does not record any view. All the internal and external grievances are managed and redressed according to the processes given in Section 7 of this report.

During the opening meeting, it was added by the authorities of the project management that, the external stakeholder engagement program of the project management is proceeding with the engagement activities that are held by the identified external stakeholders. It is reported that all the neighboring facilities, official institutions, local people representatives, and local media are visited regularly by the CLO, HSE staff and other relevant department managers (HR, administrative affairs, etc.) of the Project. On 31.05.2022, Gemlik Gübre held an organization for all external stakeholders and invited them to the Project Area for sharing information regarding the project and stakeholder engagement plan, and the grievance redress mechanism of the Project.

On 20 July 2022, the DOKAY site visit team, including a sociologist, visited 100. Primary School, Ata Neighborhood Mukhtar Office, and Engürücük Neighborhood Mukhtar Office. The CLO and HSSE Director were also joined to these interviews. During these visits, mukhtars and school management were informed regarding the stakeholder engagement plan and the grievance redress mechanism of the Project. In addition, all the concerns of these stakeholders were asked, and remarks regarding these interviews are given in Table 10-2.

Table 10-2: Notes from the Stakeholder Interviews

Interviews	
Stakeholder	Notes
The Mukhtar of Ata Neighborhood Mualla Çiğdem	<p>She indicated that she has been informed regarding the stakeholder engagement plan and the grievance redress mechanism of the Project during both the stakeholder visits which have been held by the Project Management and the stakeholder organization that was held on 31 May 2022. She added that Project Management always contacts them.</p> <p>She mentioned that her neighborhood is a place where tourism (especially Gemsaz Region of the neighborhood) and industrial activities are held together. "This situation creates a conflict", she mentioned. She shared the information that those industrial activities in the region had started early before the tourism activities. She indicated that local people Ata Neighborhood have some concerns regarding the industrial activities in the region including the Gemlik Gübre but they all know that these industrial activities are inevitable for the employment and economic growth of the region.</p> <p>During the interview, she mentioned that there are two water tanks, which have a capacity of 20 tons each, in the Project Area and the potable water needs of the Gemsaz Region of Ata Neighborhood are met from these tanks. Water is pumped to those tanks by Gemlik Municipality and then distributed to the Gemsaz Region. However, due to some technical reasons, the pressure level of the water that is distributed to the Gemsaz Region is low and local people have concerns regarding this issue. Mualla Çiğdem mentioned that she had informed the Project Management whether they can do some technical arrangements for those water tanks or not. CLO of the Project indicated that engineers of the Gemlik Gübre are checking for solutions regarding this issue and necessary action will be taken as soon as possible.</p>
The Mukhtar of Engürücük Neighborhood Osman Çelik	<p>He mentioned that Gemlik Gübre is located in the region for a long time and the Project contributes to local employment for a long time as well. He stated that Project Management always contact them and asks whether they have a grievance regarding the Project or not.</p> <p>He added that the local people of Engürücük and he have some concerns regarding the environmental effects of the Project on the region. He indicated that the local people and he think that project activities negatively affect the local agricultural activities in the region. He shared the information that the agricultural production yield decreased this year in comparison with the last year.</p> <p>Project management representatives responded to this concern during the meeting by indicating the fact that there is not any change in the production processes during the last year and this year and there may not any effect of the Gemlik Gübre activities on the local agricultural activities in the last year and this year.</p>
The Assistant Director of 100. Yıl Primary School İbrahim Şahin	<p>He mentioned that there is not any issue regarding the construction and operational activities of the Gemlik Gübre. He indicated that they can always communicate with the Project Management of the Gemlik Gübre. He stated they had been informed regarding the stakeholder engagement plan and grievance redress mechanism of the Project by the Project Management.</p> <p>During the interview, it has been indicated that the basic maintenance works of the school are accomplished by the Project Management when it is necessary. Last month, the school management had asked for the maintenance of the lectern in the school garden, and it was stated during the meeting that Project Management has taken action regarding this issue.</p>

Photographs taken during the site visit studies are shared in Annex-7.

11 CONCLUDING REMARKS

DOKAY held site visit studies Gemlik Gübre Facility on 19-20 July 2022. During the studies, Project has been investigated in environmental and social aspects. In the scope of the Stakeholder Engagement Plan and Grievance Redress Mechanism, current applications of Gemlik Gübre have been identified. All the stakeholders have been defined and interviews have been held with the external stakeholder representatives in order to check the current applications and inform those stakeholders regarding the stakeholder engagement activities, especially the grievance redress mechanism of the Project.

It can be concluded from the information gathered during the meetings with the authorities of the Project and interviews with the stakeholder that, current grievance redress mechanisms and stakeholder engagement activities are known by internal and external stakeholders, and they can share their suggestions and grievances easily.

SA8000:2014 audit result is the main evidence that the Project's internal stakeholder engagement and grievance redress mechanism are satisfactory. In addition, the organization that is held on 31 May 2022 for the external stakeholders and external stakeholder interviews are the main indicators for the success of the external stakeholder engagement and grievance redress mechanism.

Participation of employees in project management increases the motivation of the employees to work. One of the most important tools for ensuring the participation of employees in the management is to receive and evaluate their opinions and suggestions about the project. In this context, employees should be motivated to share their opinions and suggestions. This motivation can be achieved by scoring the opinions and suggestions of the employees according to their content and presenting awards according to their scores. In this context, it was assessed during the field and office studies that the current stakeholder management in Gemlik Gübre has the capacity to implement such innovations.

This plan has been prepared for all stakeholders to have information about the project and to share any questions, suggestions, or complaints they have regarding the project. By means of this report, all the contact tools with the internal and external stakeholders are defined; and a comprehensive stakeholder engagement and grievance redress mechanism have been established. Therefore, cases or grievances can be managed effectively by this SEP+GRM.


In the scope of the environmental and social action plan of the Project, environmental and social monitoring studies will be held. During the phase of the Project, two environmental and social monitoring studies will be accomplished. In this regard, the implementation of SEP+GRM will be monitored during these studies and constructive action will be taken in order to adapt this SEP+GRM to future applications.

ANNEXES

ANNEX-1: Satellite Image and the Access Roads of the Facility



ANNEX-2: “EIA is not necessary” Decision for the Three Fertilizer Temporary Storage Tank

	T.C. BURSA VALİLİĞİ İl Çevre ve Orman Müdürlüğü
Karar Tarihi : 07.06.2005 Karar No : 151	
ÇED GEREKLİ DEĞİLDİR BELGESİ	
<p>16 Aralık 2003 tarih ve 25318 sayılı Resmi Gazete’de yayımlanarak yürürlüğe giren Çevresel Etki Değerlendirmesi Yönetmeliği’nin 17. maddesi gereğince; “Üç Adet Geçici Gübre Deposu Yapımı” Projesine “ÇED Gerekli Değildir Kararı” verilmiştir.</p>	
<p>Faaliyet Sahibi : Gemlik Gübre Sanayi A.Ş</p> <p>Faaliyetin Yeri : Bursa İli, Gemlik İlçesi, Hisar Mahallesi, 59 pafta, 616 ada, 57 nolu parselde yer alan 31.777,81 m²’lik tapulu saha ile Hisar Mahallesi, Büyükçukur Mevkii, 59 pafta, 488 ada, 5 nolu parselde yer alan, 429.600 m²’lik tapulu saha,</p>	
<p>Mustafa AYDIN Vali a. Vali Yardımcısı</p>	

ANNEX-3: "EIA Positive" Decision for the Urea Facility





T.C.
ÇEVRE ve ŞEHİRCİLİK BAKANLIĞI
Çevresel Etki Değerlendirmesi, İzin ve Denetim Genel Müdürlüğü



ÇED OLUMLU BELGESİ

25.11.2014 tarih ve 29186 sayılı Resmi Gazete’de yayımlanarak yürürlüğe giren Çevresel Etki Değerlendirmesi Yönetmeliği’nin 14. maddesi gereğince; **"ÜRE ÜRETİM TESİSİ "** projesi hakkında **"Çevresel Etki Değerlendirmesi Olumlu"** kararı verilmiştir.



Muhammet ECEL
Bakan a.
Genel Müdür

Karar Tarihi : **26.11.2018**
Karar No : **5254**
Proje Sahibi : GEMLİK GÜBRE SANAYİİ A.Ş.
Proje Yeri : Bursa İli, Gemlik İlçesi, Hisar (Ata) Mahallesi (616 Ada 100 Parsel) Gemsaz

ANNEX-4: Informative Letter Prepared by the General Directorate of the Turkish Employment Agency



T.C.
TÜRKİYE İŞ KURUMU GENEL MÜDÜRLÜĞÜ
Bursa Çalışma ve İş Kurumu İl Müdürlüğü
Gemlik Hizmet Merkezi

GEMLİK HİZMET MERKEZİ
Tarih: 26.11.2021 11:05
Sayı: E-78348613-203.01.02.1-00010167879



Sayı : E-78348613-203.01.02.1-00010167879
Konu : İSTİHDAM

26.11.2021

GEMLİK GÜBRE SANAYİİ ANONİM ŞİRKETİ
ATA MAH SANAYİ CAD No:6/0 BURSA/GEMLİK

İlgi :10162387 Sayı ve 25.11.2021 Tarihli Dilekçeniz

Hizmet Merkezimiz ile 22015010100253290160264 SGK numaralı, 61273634511 İşkur numaralı **GEMLİK GÜBRE SANAYİİ ANONİM ŞİRKETİ** firması arasında 2021 yılı içinde "Amonyum Nitratlı Gübre İmal İşçisi" mesleğinde 992108, 1005523, 1029443, 1047457 portal numaralı işbaşı eğitim programları düzenlenmiştir. Düzenlenen işbaşı eğitim programları neticesinde **GEMLİK GÜBRE SANAYİİ ANONİM ŞİRKETİ** tarafından "Amonyum Nitratlı Gübre İmal İşçisi" mesleğinde 125 kursiyerin istihdamını sağlamış olup firma yerel istihdama Hizmet Merkezimiz ile işbirliği içerisinde katkıda bulunmuştur.

Bilgilerinize rica ederiz

Ünver ÜNVER
Şube Müdürü

Bu belge güvenli elektronik imza ile imzalanmıştır.

Belge Doğrulama Adresi: <https://www.turkiye.gov.tr/iskur-ebys>

Belge Doğrulama Kodu: 3113E5F6-74E5-416D-8FD8-A465A5434447

Adres: Hamidiye, Kuşlu Sk. No:3 D:A, 16600 Gemlik/Bursa
Telefon No: 0224 513 13 00 Faks No:
e-Posta: cetin.aydin@iskur.gov.tr İnternet Adresi: www.iskur.gov.tr
KEP Adresi: gemplikcalismaiskurumu@hs01.kep.tr

Ayrıntılı bilgi için: Çetin AYDIN
Büro Personeli
Telefon No: 0224 513 13 00



ANNEX-5: Contact Information of the Stakeholders and Maps Showing the Neighboring Stakeholders

Table A3-1: Contact Information of Governmental Institution and Municipalities

Relevant Institutes	Communication Channels
100. Yıl Primary School	Address: GEMLİK GÜBRE SAN.SİTESİ Gemlik / Bursa Phone: 0 224 519 0295
AFAD	Address: Küçükbalıklı Mh.11 Eylül Blv.No:197/1-2-16250 Osmangazi/BURSA E-mail: bursamdr@afad.gov.tr Phone: 0224 216 00 00 Website: https://bursa.afad.gov.tr/iletisim
Ata Neighborhood Mukhtar Office	Phone: 05533805139-02245141070
Azot Mosque	Address: GEMLİK GÜBRE SAN.SİTESİ Gemlik / Bursa Phone: 0507 681 98 40
Bursa Governorship	Adress: Hocaalızade Mh. 6. Kültür Sok. No: 2 Heykel Osmangazi/BURSA E-mail: bursa@icisleri.gov.tr Phone: 0224 225 19 00 - 0224 222 60 00
Bursa Municipality	Address: Zafer Mh. Ankara Yolu Cd. C Blok No:1 PK:16080 Osmangazi / BURSA Communication Center: 444 16 00 E-mail: beyazmasa@bursa.bel.tr Website: https://www.bursa.bel.tr/iletisim Phone to Report Wishes and Grievances: 153 "Whatsapp" Communication: 0542 423 16 16
Bursa Provincial Directorate of Agriculture and Forestry	Address: Adalet Mahallesi 1.Hürriyet Caddesi Osmangazi/BURSA Phone: 0224 2464230 E-Mail: bursa@tarimorman.gov.tr
Bursa Provincial Directorate of Environment, Urbanization and Climate Change	Address: Çirpan Mah. Stadyum Cad. No: 16 16050 Osmangazi BURSA Phone: 224 2715110-11-12-13-14 E-Mail: bursa@csb.gov.tr Website: https://bursa.csb.gov.tr/iletisim
Bursa Technical University	Address: Mimar Sinan Campus16310 Yıldırım / BURSA Phone: (0224) 3003305 E-Mail: ozelkalem@btu.edu.tr
Bursa Uludağ University	Address: Görükle Kampusu 16059 Nilüfer/BURSA Phone: (0224) 294 00 00 E-Mail: ozelkalem@uludag.edu.tr
Engürücük Neighborhood Mukhtar Office	Phone: 05379331619
Gemlik District Directorate of Health	Address: Dikkaldırım Mah. Hat Caddesi No:4 Osmangazi, BURSA Phone: 0224 295 60 00 - 01-02-03-04 E-Mail: bursa@saglik.gov.tr
Gemlik District Directorate of National Education	Address: Dr. Ziya Kaya Mahallesi Fatih Caddesi No 75 16600 Gemlik / Bursa Phone: 0(224) 513 1174 0(224) 513 1196 0(224)513 4970 Web-Site: https://gemlik.meb.gov.tr/www/iletisim.php
Gemlik Municipality	Address: Hamidiye Mah. Kuvayimillie Bulvarı Sosyal Yaşam Merkezi Binası No:138 GEMLİK / BURSA Phone: 0 224 5134521 - 22 - 23 – 24 E-mail: admin@gemlik.bel.tr

State Hydraulic Works Bursa Directorate	Address: DSI 1. Bölge Müdürlüğü Duaçınarı mah. Ankara Caddesi No:221 Yıldırım / BURSA Phone: 0 224 360 50 00 E-mail: dsi1@dsi.gov.tr
TEİAŞ	Address: Fethiye Mahallesi Bursa Organize Sanayi Bölgesi Sarı Cadde P.K.50 16140 Nilüfer/BURSA Phone: 0 (224) 243 13 30 E-Mail: teias.2bolge@hs01.kep.tr
The Union of Chambers of Commodity Exchanges (Bursa)	Address: Tayakadin Mah. Kiremitçi Caddesi No:28 Osmangazi Phone: 224-4441610 E-Mail: btb@btb.org.tr

Table A5-1: Contact Information of Neighboring Stakeholders

Relevant Institutes	Communication Channels
BP (Castrol)	Address: Ata Mahallesi Liman Cad. No:8 Gemlik/BURSA Phone: 0(224) 524 83 00 / 0(224) 524 83 05 Web: www.bp.com.tr
BORUSAN	Address: Ata Mahallesi 125 Nolu Sokak No:3 Gemlik/BURSA Phone: 0(224) 270 13 00 / 0(224) 519 01 53 Web: www.borusanlimani.com
Çimtaş*	Address: Ata Mah. Sanayi Cad. No: 52 – 16600 Gemlik – Bursa Phone: + 90 224 519 02 50 E-Mail: cimtash_gemlik@cimtas.com
BUSEB (Bursa Free Trade Zone)	Address: Ata Mah. Serbest Bölge Orkide Cad. No: 4/1 Gemlik / BURSA, TÜRKİYE Phone: (224) 524 8689 E-Mail: info@buseb.com
Gemport	Address: Ata Mahallesi Liman Cad. No:12 Gemlik/BURSA Phone: 0(224) 524 88 31 / 0(224) 524 88 30 Web: www.gemport.com.tr
Gemlik Customs Office	Address: Ata Mah. Liman You Koca Çukur Mevkii Serbest Bölge Yanı Gemlik / Bursa Phone: 0224 524 85 86, 0224 524 85 87 E-mail: burgem@ticaret.gov.tr
MKS Port	Address: Ata Mahallesi Sanayi Cad. No:7 16600 Gemlik/BURSA Phone: (224) 519 03 00 Web: www.mksmarmara.com
Roda Port	Address: Ata Mahallesi 146 nolu Sk. No:5 16600 Gemlik/BURSA Phone: 0(224) 519 00 30 Web: www.rodaport.com

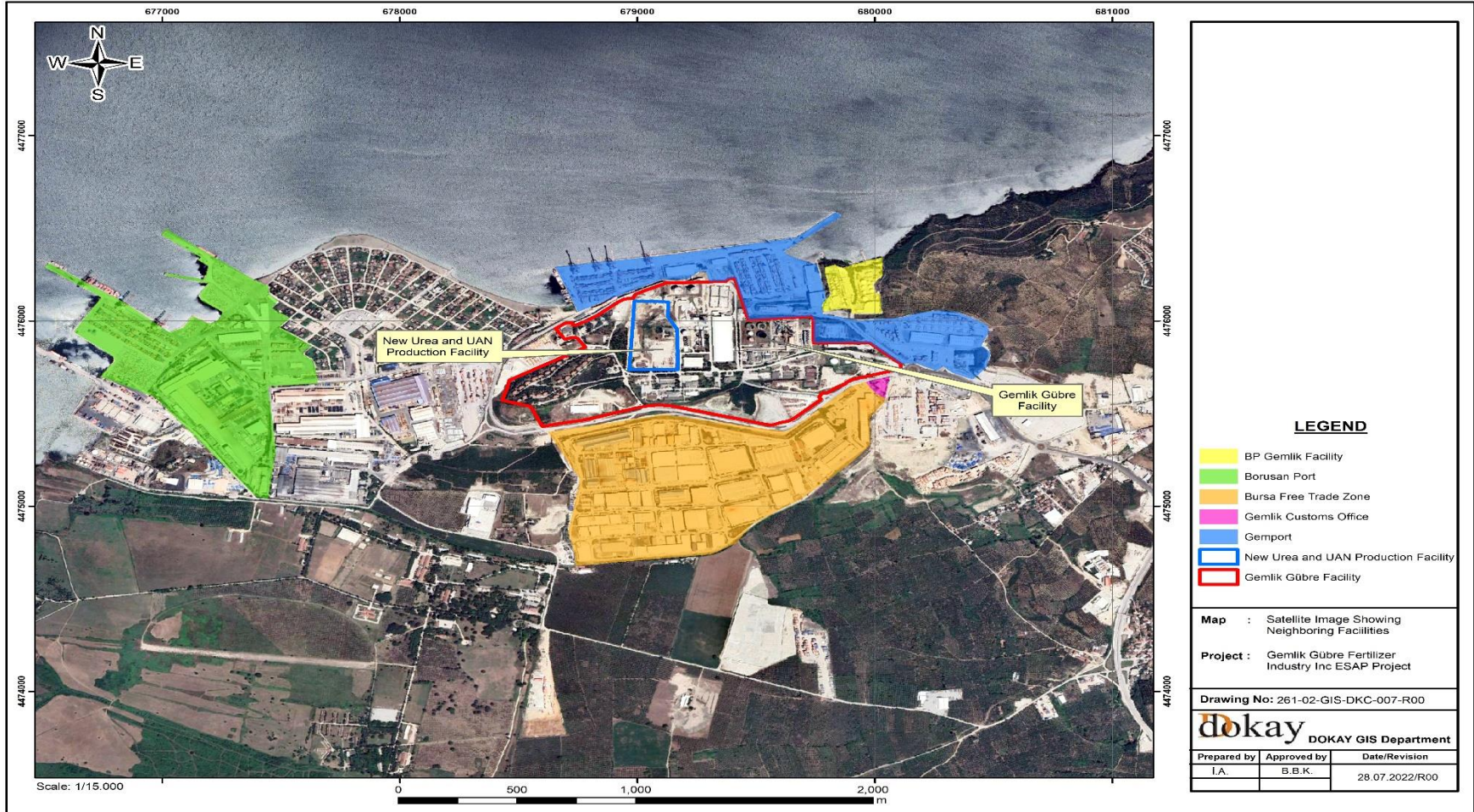



Figure A5-1: Satellite Image of the Main Neighboring Facilities

*" Çimtaş" Steel Fabrication Assembly is located on the west of the Project Area and on the east of the Borusan Port.



Figure A5-2: Satellite Image of the Neighboring Locations

ANNEX-6: Grievance Form

	Comment / Suggestion, Grievance and Communication Form		Doküman No	F045 OR		
			Sürüm Tarihi	26.08.2021		
			Sürüm No	00		
			Sayfa Sayısı	1 / 1		
Registration Number						
Reason of Communication	<input type="checkbox"/> Comment/Suggestion	<input type="checkbox"/> Grievance	<input type="checkbox"/> PSMS	<input type="checkbox"/> Other ()		
Full Name						
	<input type="checkbox"/> I would like to share my grievance / comment / suggestion with anonymously.					
	<input type="checkbox"/> I would like to stay anonymous without my permission.					
<i>Note: If you would not like to share your information with the third party you may stay anonymous.</i>						
Feedback to Communication informations	<input type="checkbox"/>					
	<input type="checkbox"/> With the phone:					
	<input type="checkbox"/> With the e-mail:					
	<input type="checkbox"/> I would not like to get in touch					
Details about communications:			Date ____ / ____ / 20__			
					<input type="checkbox"/> One time situation / grievance (Date ____ / ____ / 20__)	
					<input type="checkbox"/> More than once (How many times?) ()	
					<input type="checkbox"/> Still happening (Please write the details.)	
What would you like / suggest to solve the problem?						
Chapter which will be filled by the responsible						
Explanations / Actions / Respond						
Responsible's Informations	Date	Signature				

ANNEX-7: Photographs that are Taken During the Stakeholder Interviews



Photo #1: Stakeholder Interview with the Mukhtar of Ata Neighborhood



Photo #2: Stakeholder Interview with the Assistant Director of the 100. Yil Primary School



Photo #3: Stakeholder Interview with the Mukhtar of Engürücük Neighborhood



Photo #4: DOKAY Site Survey Team (with orange coats) and Project Management Representatives