



Stakeholder Engagement Plan

Elazığ Integrated Health Campus Project

July 2015

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TABLE OF CONTENTS

- 1.0 INTRODUCTION 1**
 - 1.1 Project Information 1
 - 1.2 Project Program..... 3
- 2.0 NATIONAL REGULATORY REQUIREMENTS AND INTERNATIONAL PRACTICE 5**
- 3.0 STAKEHOLDER IDENTIFICATION 7**
 - 3.1 Introduction..... 7
 - 3.2 Neighbouring Land Users 7
 - 3.3 Local Communities 7
 - 3.4 Hospitals 8
 - 3.5 Governmental Organizations 8
 - 3.6 Non-Governmental Organizations 10
- 4.0 STAKEHOLDER ENGAGEMENT APPROACH 12**
- 5.0 STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN TO DATE 13**
- 6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING FINAL DRAFT ESIA DISCLOSURE 15**
- 7.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING CONSTRUCTION AND OPERATION PHASES . 16**
- 8.0 SCHEDULE FOR ESTABLISHMENT OF THE PROJECT 18**
- 9.0 GRIEVANCE MECHANISM 19**
- 10.0 RESOURCES AND RESPONSIBILITIES 22**
- 11.0 REPORTING..... 22**

ANNEX A – Comment/Complaint Form

ANNEX B – Complaint Action Form

1.0 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Elazığ Integrated Health Campus Project (IHC or Project). The Project will be developed by ELZ Sağlık Yatırım A.Ş. (ELZ A.Ş.) who will be responsible for the design, construction, equipping and maintenance of the IHC within a project period of 28 years, under a Public Private Partnership Agreement with Ministry of Health (MoH). The IHC will involve a Main Hospital and a High Security Forensic Psychiatric Hospital (FRH) with a total capacity of 1,038 beds, and a separate 60-unit Oral and Dental Clinic.

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

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

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

1.1 Project Information

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

MoH as part of the public private partnership projects to serve the 4th health region that covers Elazığ, Malatya, Bingöl, and Tunceli provinces.

A bid was tendered by MoH for the Construction Works and the Provision of Products and Services for Elazığ Integrated Health Campus, and awarded to a joint venture whose pilot members built the current partnership structure in time and established a Special Purpose Vehicle (SPV) named ELZ Sağlık Yatırım A.Ş. (ELZ A.Ş.) which is comprised of four companies including Rönesans Holding A.Ş., Rönesans Sağlık Yatırım A.Ş., Sıla Danışmanlık Sağlık Bilişim İnşaat Ticaret A.Ş. and Şam Yapı Sanayi ve Ticaret Ltd. Şti. Meridiam Eastern Europe Sarl is currently in the process of becoming a shareholder of the SPV. The Project's initial agreement has been signed between MoH and ELZ A.Ş. on 04.06.2013. The signing of the agreement together with its annexes has been finalized on 26.08.2014.

Under the terms of the agreement with MoH, ELZ A.Ş. will be responsible for the detailed design, construction, equipping, financing, maintenance and operation of the IHC for a 28-year project period (covering a construction period of 3 years and operation period of 25 years), while the provision of medical services will be the responsibility of MoH. At the end of the project period, IHC will be transferred to MoH.

The Project is located in the Ulukent (Hüseyinik) neighborhood within the central district of Elazığ province. The Project location is provided in Figure 1-1.



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

The Project comprises of an integrated health campus with a total capacity of 1038 beds consisting of two hospitals and one clinic. These are the 888-bed Main Hospital, 150-bed High Security Criminal Psychiatric Hospital and 60-unit Oral and Dental Clinic. Main hospital will include:

- 493-bed General Hospital
- 299-bed Women/Maternity & Pediatrics Hospital (WMPH)
- 96-bed Psychiatric Hospital

Main Hospital will consist of three patient tower blocks surrounding a common core and will have nine floors, two entrance levels (higher and lower entrance) and three basement floors. The land for the fourth patient block around the common core is reserved for future expansion. In addition to the hospitals, there will be health support facilities, commercial area, technical unit building, a helipad and a trigeneration plant. The layout of the hospitals is shown in Figure 1-2.

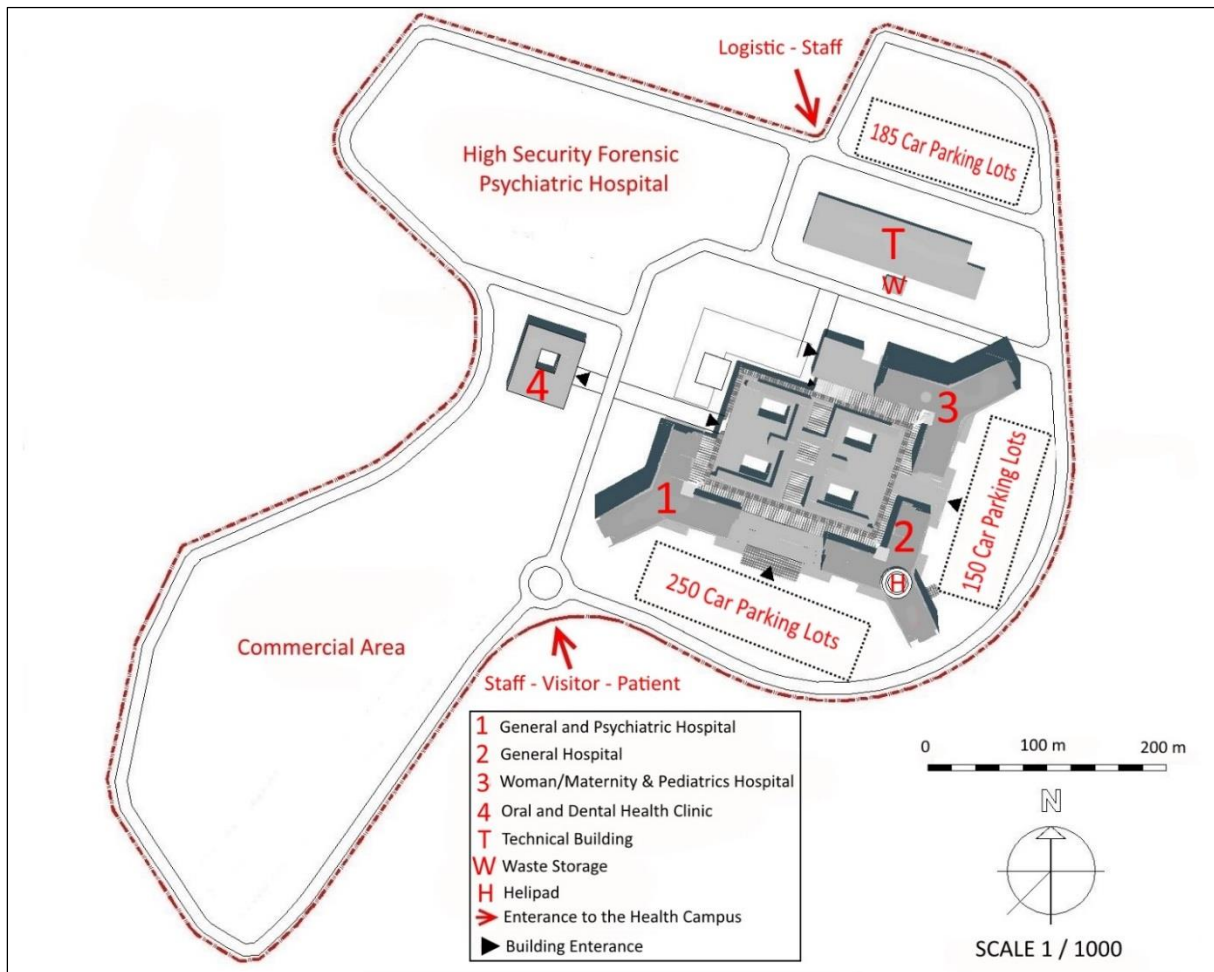


Figure 1-2. Layout of the hospitals

1.2 Project Program

ELZ A.Ş. has approached multinational financial institutions (FIs) to fund the development of the Project. One of the requirements of these FIs for granting loans is the preparation of an ESIA Report for identifying potential environmental and social impacts and risks of the Project and developing mitigation measures appropriate to the nature and scale of the Project. An ESIA Report has been prepared to comply with the requirements of International Finance Corporation's (IFC) Performance Standards (PSs) on Social and Environmental Sustainability (dated January 2012) and European Bank for Reconstruction and Development's (EBRD) Performance Requirements (PRs) (dated May 2008)

for key areas of environmental and social issues. In addition to the IFC PSs and EBRD PRs; IFC Environmental, Health and Safety (EHS) General Guidelines, IFC EHS Guidelines for Healthcare Facilities, EBRD Sub-sectoral Environmental and Social Guidelines for Health Services and Clinical Waste Disposal and other relevant international guidelines were taken into account during the ESIA process.

The ESIA Report is accompanied by an Environmental and Social Management Plan that identifies how significant impacts will be mitigated, managed and monitored during the construction and operation phases of the Project. The ESIA process for the Project started in early October 2014 and is planned to be completed in September 2015.

The construction of the Project will take up to 36 months. The tentative construction schedule is given in Table 1-1.

Table 1-1. Tentative Construction Schedule

Works to be undertaken	1 st year				2 nd year				3 rd Year			
	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter	1 st quarter	2 nd quarter	3 rd quarter	4 th quarter
Contractual Processes												
Design Processes												
Mobilization												
Earth & Infrastructural Works												
Structural Works												
External Site Works (Landscaping)												
Mechanical & Electrical Works												
Automation & Furnishing												
Testing & Commissioning												

2.0 NATIONAL REGULATORY REQUIREMENTS AND INTERNATIONAL PRACTICE

Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette date and number: 25.11.2014/29186) includes provisions for public consultation and disclosure of project information for projects listed in Annex-1 of the regulation. The Turkish EIA Regulation has been subject to several changes in the last two years covering changes in requirements for hospital projects. EIA studies were not required to be undertaken for hospital projects according to the 2008 EIA Regulation (Official Gazette date/number: 17.07.2008/26939) which has been replaced with the 2013 EIA Regulation (Official Gazette date/number: 03.10.2013/28784) that required large hospital projects (defined as 500 beds and above) to undertake an EIA study. 2013 EIA Regulation has recently replaced with 2014 EIA Regulation that again excludes hospital projects. When the ESIA studies started, 2013 EIA Regulation was in force. Correspondence with the Ministry of Environment and Urban Planning (MEUP) conducted by ELZ A.Ş. revealed that the Project is exempt from the 2013 EIA Regulation based on the fact that the bidding process for the Project has been completed before the effective date of the 2013 EIA Regulation. The Project also received an official EIA exemption letter from MEUP. Therefore, no EIA procedure and stakeholder engagement are officially needed for the Project. On the other hand, ELZ A.Ş. has made an application to MEUP and requested to undertake an EIA study as per the article 24 of the 2013 EIA Regulation which states that an EIA study can be undertaken upon request of the project owner if it is found appropriate by MEUP. Accordingly, an EIA study is also being undertaken in addition to the ESIA study. The EIA study covers the hospitals and also the concrete batching plant (with a capacity of 120 m³/h) that will be installed during the construction phase of the Project. In addition, considering the maximum rated thermal capacity of 30 MW of the trigeneration system and the boilers, these will be subject to EIA Regulation requirements according to the 20 MW threshold mentioned in Annex-2 of the EIA Regulation, for which stakeholder engagement is not required.

As ELZ A.Ş. has approached international financial institutions (e.g. EBRD) for the development of the Project, the Project needs to comply with the requirements of EBRD Environmental and Social Policy, EBRD PR 10 and IFC PS 1. The Project has been categorized as Category B by EBRD. On the other hand, it is important to note that Elazığ IHC is a large hospital project considering the number of beds. Regardless of the category, EBRD is committed to stakeholder engagement that is free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

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

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

- (iii) maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.

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

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

3.0 STAKEHOLDER IDENTIFICATION

3.1 Introduction

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

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

3.2 Neighbouring Land Users

The closest settlements to the Project area include individual houses located to the south (at distances of 55 m to 130 m), north (at distances of 130 m) and west (at distances of 110 m). Behind these individual houses, residential areas of Ulukent neighborhood (to the west of the Project area) and Dogukent neighborhood (to the south/southwest of the Project area) exist. In addition to the residential buildings mentioned, the following facilities are identified in the immediate vicinity of the Project area:

- A minibus station (approximately 30 m to the south)
- A dormitory (250 m to the southeast)
- 75. Yıl Anatolian High School and Nahit Ergene Elementary School (350 m to the south), and a high school (320 m to the west)

These are considered as important stakeholders particularly related to impacts during construction phase such as noise and air quality impacts, potential traffic increase during construction and operation phases and security of High-Security Forensic Psychiatric Hospital during operation.

3.3 Local Communities

Neighbourhoods around the Project area and at a wider distance (approximately within 10 km diameter considering the potential for traffic impacts to be felt up to this distance) were considered that include a total of 39 neighborhoods under the jurisdiction of Elazığ central district. These neighborhoods are as follows: Dogukent, Ulukent, Catalcesme, Harput, Kirkklar, Sali Baba,

Karsiyaka Mustafa Pasa, Sanayi, Yildiz Baglari, Hilalkent, Kizilay, Rustem Pasa, Icadiye, Rizaiye, Carsi, Güneycayir Village, Fevzi Cakmak, İzzetpasa, Sarayatik, Aksaray, Akpinar, Nailbey, Yeni, Esentepe, Universite, Kultur, Zafran, Gumus Kavak, Olgunlar, Cumhuriyet, Abdullah Pasa, Atasehir, Sursuru, Sugozu, Ala Yaprak, Caydacira, Gollu Bag, Hicret.

3.4 Hospitals

Based on information obtained from Elazig Provincial Health Director within the scope of ESIA stakeholder consultations, there are plans to close some of the hospitals either in full or partly and/or to make alterations in the existing hospitals in Elazig province, however this is not only related with Elazig IHC Project but rather related to create a more efficient health service in Elazig province. It was stated by the provincial health director that the closure of hospitals is currently in planning phase and has not been officially finalized. Accordingly, it is not clear at this stage which hospitals will be closed and/or rehabilitated and which of these changes are related with Elazig IHC Project. There are 7 public, 1 university, 4 private and 1 military hospitals in Elazig which have been identified and included in the stakeholder register.

3.5 Governmental Organizations

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

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Ministry of Health (MoH), General Directorate of Health Investments	The Project has been proposed by MoH. MoH will be responsible for the provision of medical services during operation phase of the Project.
	MoH, General Directorate of Management Services	
	MoH, Public Hospitals Institution	
	MoH, General Directorate of Health Services	
	MoH, General Directorate of Emergency Health Services	
	MoH, Public Health Agency of Turkey	
	Ministry of Environment and Urban Planning (MEUP), General Directorate of EIA, Permit and Audit	MEUP has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting.
	MEUP, General Directorate of Environmental Management	
	MEUP, General Directorate of Spatial Planning	
	MEUP, General Directorate of Protection of Natural Assets	These organizations may have specific views on protected sites, lakes and dams close to the Project site.
Ministry of Forestry and Water Affairs (MoWA), General Directorate of State Hydraulics Works (DSI)		
MoWA, General Directorate for Nature Protection and National Parks	MoLSS may have specific views on labor and working conditions, and health and safety of the healthcare personnel.	
Ministry of Labor and Social Security (MoLSS), General Directorate of Labor		
MoLSS, General Directorate of Occupational Health and Safety		
MoLSS, Social Security Institution	This organization may have specific views about water courses running close to the Project area.	
Elazig 9 th Regional Directorate of State Hydraulic Works		
Regional	Elazig 15 th Regional Directorate of Ministry of Forestry and Water Affairs	This organization may have specific views on the protected areas close to the Project area.
	Elazig Regional Directorate of Labor and Social Security	Opinion may be provided related to the regional healthcare workforce.

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
Regional	8 th Regional Directorate of General Directorate of Highways	The organization may provide opinion regarding roads and highways related to Project area.
	8 th Army Corps Commandership	This organization may provide opinion on the past use of the Project area. The martyrs' cemetery is under the responsibility of this authority.
	Diyarbakır Regional Board Directorate of Cultural Assets Protection	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project site.
Provincial	Elazığ Governorship	The governorship representing the national government is the highest authority in the province.
	Elazığ Municipality	The municipality and its relevant departments will have responsibilities in relation to the Project.
	Elazığ Municipality, Directorate of Transportation Services	The organization may have specific opinion on the management of traffic related to Project.
	Elazığ Governorship Provincial Directorate of Health	These organizations are involved in the provision of health services and healthcare workforce in the province.
	Elazığ Governorship Provincial Directorate of Public Health	
	Elazığ Province General Secretariat of Public Hospitals	
	Elazığ Provincial Directorate of Social Security Institution	
	Elazığ Provincial Directorate of Environment and Urbanization (PDEUP)	PDEUP has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting.
	15 th Regional Directorate of Ministry of Forestry and Water Affairs Provincial Directorate of Elazığ	This organization may provide specific opinion on the status of trees within the Project area.
	Elazığ Provincial Directorate of Food, Agriculture and Livestock	This organization may provide provincial-specific and or site-specific views on the Project.
	Elazığ Provincial Command of Gendarmerie	This organization provides security services to High Security Forensic Psychiatric Hospital.
Elazığ Disaster and Emergency Management Directorate	This organization has a function to manage and respond to emergency situations.	
Elazığ Provincial Directorate of Culture and Tourism	This organization may provide an opinion related to archaeological potential of the Project site.	
District	The Local Governorship of Agin, The Municipality of Agin	The Project site is located in central district, and both the local governorship and the central municipality are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project. The other local governorships and municipalities are also related to the Project as it will cover several hospitals which are also important for other districts.
	The Local Governorship of Baskil, The Municipality of Baskil	
	The Local Governorship of Karakocan, The Municipality of Karakocan	
	The Local Governorship of Keban, The Municipality of Keban	
	The Local Governorship of Kovancilar, The Municipality of Kovancilar	
	The Local Governorship of Maden, The Municipality of Maden	
	The Local Governorship of Palu, The Municipality of Palu	
	The Local Governorship of Sivrice, The Municipality of Sivrice	
	The Local Governorship of Alacakaya, The Municipality of Alacakaya	
	The Local Governorship of Aricak, The Municipality of Aricak	
	The Municipality of Akcakiraz, The Municipality of Mollakendi, The Municipality of Yazikonak, The Municipality of Yurtbasi	

3.6 Non-Governmental Organizations

A list of key NGOs (including women associations and public education centers) that may have interest in environmental and social aspects of the Project is also prepared as given below:

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Turkish Medical Association	Turkish Medical Association has previously filed a lawsuit for other three hospitals that are planned to be built through a public-private partnership (PPP) model and towards the PPP model, in general. It is important to engage with this association to understand their concerns.
	Trade Union of Public Employees in Health and Social Services	These associations together with the Turkish Medical Association has published a notice on negatives aspects of PPPs.
	Trade Union of Revolutionary Health Workers	
	Association of Social Service Specialists	
	Association of All Technicians of Radiology	
	Turkish Dental Association	
	Turkish Nurses Association	
	Turkey Trade Union of Health Workers	
	Trade Union of Employees of Health and Social Services	
	Trade Union of All Employees of Health and Social Services	
	White Coat Trade Union of Health and Social Services	
	Trade Union of Medical Workers	
	Trade Union of Health and Social Service Employees Rights	
	Trade Union of Turkish Public Employees in Health and Social Service Branch	
	Trade Union of Anatolian Health and Social Service Employees	
National	Trade Union of Active Health	Trade unions are important stakeholders representing the labor rights of health sector personnel.
	Independent Trade Union of Public Workers in Health and Social Services	
	Trade Union of Democratic Employees of Health and Social Services	
	United Trade Union of Public Workers in Health and Social Services	
	Turkish Red Crescent	
	Pediatric Nurse Association	
	Oncologic Nurse Association	
	Urology Nurse Association	
	Obstetricians and Nurses Association	
	Turkish Intensive Care Nurses Association	
	Doctors Rights Association (contact details could not be identified)	
	Doctors Association	
	Contemporary Pharmacists Association	
	Psychiatric Association of Turkey	
	Turkish Society of Anesthesiology and Reanimation	
	Turkey National Pediatric Association	
	Association of Patient and Patient Relatives Rights (contact details could not be identified)	
	Association of Health Employees	
	The Health Foundation of Turkey	
	Foundation of Hope in Health	
	Health Tourism Association of Turkey	
	Turkey Confederation of Disabled	Requesting opinion of these associations is important to understand their expectations.
Turkey Handicapped Association		
Provincial	Turkish Medical Association Elazığ Chamber of Medical Doctors	These organizations are representatives of their national organizations and may provide specific opinion regarding different issues within the province.
	Turkish Red Crescent Elazığ Office	
	Trade Union of Health and Social Service Employees Elazığ Office	
	Trade Union of Turkish Public Employees in Health and Social Service Branch Elazığ Office	
	Trade Union of Public Employees in Health and Social Service Branch in	

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
Provincial	Turkey Elazığ Office	These chambers may provide provincial-specific and or site-specific views related to the Project.
	Association of Solidarity of Health Members, Protection of Public Health and Environment	
	Turkey National Pediatric Association Elazığ Office	
	Psychiatric Association of Turkey - Elazığ Branch Office	
	Turkish Anesthesiology and Reanimation Society Elazığ Office	
	Turkish Pediatric Association Elazığ Office	
	Chamber of Environmental Engineers (Central Office)	
	Chamber of Urban Planners (Ankara Office)	
	Chamber of Civil Engineers (Elazığ Regional Representative Office)	
	Chamber of Forest Engineers (Elazığ Office)	
	Chamber of Architects (Elazığ Office)	
	Chamber of Geophysics Engineers (Elazığ Regional Representative Office)	
	Chamber of Geology Engineers (Elazığ Regional Representative Office)	
	Protection of Mental Health Association	Requesting opinion of these associations is important to understand their expectations.
	Euphrates Tigris Watershed Ear, Nose, Throat and Head and Neck Surgery Society	
	Elazığ Province Improvement of Health Services and Beautification Association	
	Headmen Association	
	Tuberculosis Control Association	
	Elazığ Kidney Patients Help and Solidarity Association	
	Living with Multiple Sclerosis Association	
Turkey Handicapped Association Elazığ Office		
Employment of Elazığ Spinal Cord Paralytics Association		
Elazığ Down's Syndrome Association		

Women Associations and Education Centers		
Level	Organization	Relation to the Project
Women's Associations (Provincial level)	Improvement and Consciousness-raising Association for Eastern Women	Women tend to attend sick family members to visit a hospital and their views on the IHC are important.
	Women's Center Foundation- Elazığ Branch	
	Women's Lifelong Reproductive Health Center	
	Association of Education and Culture Center of Women	
	Entrepreneurship and Personal Development Association of Women	
	Association of Business Women of Elazığ	
	Solidarity Association of Women Healthcare Personnel- Elazığ Branch	
El-aziz Fraternal and Solidarity Association of Women		
Education Centers (District level)	Agin Public Education Center	
	Alacakaya Public Education Center	
	Aricak Public Education Center	
	Baskil Public Education Center	
	Karakocan Public Education Center	
	Keban Public Education Center	
	Kovancilar Public Education Center	
	Maden Public Education Center	
	Elazığ Center Public Education Center	
Palu Public Education Center		
Sivrice Public Education Center		

4.0 STAKEHOLDER ENGAGEMENT APPROACH

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

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

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

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

Table 4-1. Project phases and proposed engagement approach

Project Phase	Engagement Approach
Phase 1: ESIA Study Consultations	<ul style="list-style-type: none"> • Face-to-face meetings with selected governmental authorities • Face-to-face meetings with headmen of the surrounding neighborhoods in appropriate languages • Face-to-face meetings with the surrounding facilities, if needed • Sending out Project Information Documents to selected governmental and non-governmental organizations • Sending out Project Information Document and Project Information Leaflet to selected neighborhoods • Newspaper advertisements • Handouts distributed to public to inform them about public consultation meeting • Phone calls to headmen of selected neighborhoods and women associations to inform them about the Project and invite them to the public consultation meeting • Public consultation meeting • Using an email address to collect views • Disclosure of information in the Project website • Setting up a Grievance Mechanism
Phase 2: Final Draft ESIA Disclosure	<ul style="list-style-type: none"> • Disclosure of Final Draft ESIA Report, ESMP, ESAP and SEP in the Project website • Distribution of hard copies of Final Draft ESIA Report to district heads of Elazig • Newspaper announcements • Phone calls to headmen of selected neighborhoods and women associations to inform them to invite them to the public consultation meeting • Face-to-face meetings with officials of the schools in the vicinity of the Project area • Engagement with vulnerable groups, if any through relevant headmen • Information disclosure to vulnerable groups, if any through headmen
Phase 3: Construction	<ul style="list-style-type: none"> • Project website to disclose Project information and Project updates • Newspaper announcements, if needed
Phase 4: Operation	<ul style="list-style-type: none"> • On-going communications with relevant regulatory stakeholders and public, as necessary • Implementation of a Grievance Mechanism • Operation of a call center during operation

5.0 STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN TO DATE

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

- Identified governmental authorities (58 agencies) and NGOs (88 agencies) were sent a Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.
- A project information pack (including 5 Project Information Documents, 25 Project Information Leaflets and 25 Comment/Complaint Form) were sent together with a cover letter to headmen of 39 neighborhoods (including surrounding neighborhoods and neighborhoods at a wider distance within 10 km diameter) to provide information on the planned Project and related impacts, ongoing environmental and social impact assessment and to provide opportunity to express views and concerns about the project, and to inform how views/concerns can be submitted. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered. Prior to sending the information, the headmen were contacted by phone to inform them about the aim of the project information pack and they were requested to distribute the leaflets in their neighborhoods.
- A Public Consultation Meeting was held on 18th December 2014 in Central District. 52 people attended the meeting. The meeting was announced via advertisements in two national and two local newspapers twelve days in advance on 6th December 2014 and the advertisement was repeated at the same newspapers a week later on 13th December 2014. The meeting was also announced through handouts distributed to public in the most populated parts of the city center. The meeting was opened by the Provincial Health Director followed by the presentations of ELZ A.Ş team and ESIA team. Five representatives from ELZ A.Ş. and four representatives of the ESIA team were available during the meeting.
- In order to collect opinion letters via email, info@rsy.com.tr was/is being used.
- A Project specific website (<http://pppelazighastanesi.com/>) was established where the Project Information Document and Comment/Complaint Form are made available to the public.

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

- Elazığ Municipality, Deputy Mayor
- Elazığ Municipality, Transport Directorate
- Elazığ municipality, Technical Services Directorate
- Elazığ Municipality, Environmental Protection Directorate
- Elazığ Provincial Directorate of Health

Furthermore, a social survey was conducted in 20 neighborhoods which were selected based on the distance of the neighborhood to the Project area and the population density of the neighborhood. The selected neighborhoods are as follows:

- All neighborhoods that are located up to 2 km distance to the Project area. These neighborhoods are Ulukent, Dogukent, Catalcesme, Harput and Kirkklar.
- Neighborhoods that are located 2-5 km away from the Project area. The selected neighborhoods are Sali Baba, Karsiyaka, Mustafa Pasa, Sanayi, Yildizbaglari, Kizilay, Carsi, Aksaray, Nailbey and Yeni.
- Neighborhoods that are located 5-10 km away from the Project area. The selected neighborhoods are Universite, Kultur, Gumuskavak, Sursuru and Cumhuriyet.

The survey was conducted with the headmen of selected neighborhoods between 11th-14th November 2014.

Due to the fact that it is not clear which hospitals will be closed/rehabilitated related with Elazig IHC Project, consultation was not made with the hospitals.

The key issues that were discussed/raised during the face-to-face meetings with governmental authorities and headmen and those that were mentioned during the public consultation meeting are summarized below.

Face-to-face meetings with governmental authorities

- Alternative sites considered for the Project location
- Transport systems in Elazig province
- Capacity of Elazig Municipality to handle wastewater and wastes
- Planning related to hospital closures

Face-to-face meetings with headmen

- Location of the health campus, project site alternatives
- Delay of the project
- Positive impacts including job opportunities and access to high quality health services
- Closure of existing hospitals

Public consultation meeting

- Alternative sites considered for the Project location
- The units within the hospitals
- Difference between the scope of a regional hospital and a city hospital
- Reasons behind the delay of the Project
- The date when the health campus will be fully operational
- The employment opportunities within the Project
- Possibility of becoming a financial partner of the Project
- Construction works during winter months
- Possibilities to develop counter measures to protect youngsters from the dangers of drug addiction

6.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING FINAL DRAFT ESIA DISCLOSURE

This is the current phase of the stakeholder engagement activities. The disclosure period for the Final Draft ESIA Report is expected to start on 15th August 2015 for a period of 30 days. The objective of the disclosure period is to inform the stakeholders about the Project activities, impacts, proposed mitigation measures and monitoring.

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

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

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

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

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

ELZ Sağlık Yatırım A.Ş.

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

E-mail: info@rsy.com.tr

Telephone: 0 312 441 31 41

Fax: 0312 442 59 48

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

7.0 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING CONSTRUCTION AND OPERATION PHASES

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

Construction Phase

- Project information will be disclosed at the Project website which will be updated as deemed necessary.
- Ongoing meetings, as deemed necessary with national and local authorities will continue during construction phase related to permitting and other issues.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- Any activities likely to cause particular disturbance (such as noisy activities etc.) to the nearby neighbourhoods will be announced through handouts to be distributed to local people via headmen offices. This information will also be provided in the Project website.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 9.
- The security staff at the construction site will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.
- In order to ensure maintaining the grievance mechanism, there will be clear and visible information on the Project website and phone numbers for people to submit their grievances. In addition, phone numbers and website information will be posted on the construction site signs.

Operation Phase

- The Project website will be updated to include information on operation activities and any changes in environmental policy, plans and procedures that are followed.
- Ongoing meetings, as deemed necessary will be conducted with the national and local communities to inform them of any changes in project activities and related to permitting.
- Ongoing meetings with the Ministry of Health will be conducted as necessary.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 9.
- The security staff at the hospital will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security person will be able to convey this person to the responsible staff.

- In order to inform people widely about the grievance mechanism, there will be clear and visible information on the Project website. In addition, there will be a call center to manage the grievances.

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

Project Phase	Stakeholder Type	Engagement Approach	Responsibility
Construction	Neighboring land users and local communities	<ul style="list-style-type: none"> • Project website for Project updates • Implementation of grievance mechanism • Making comment/complaint forms available at the construction site office • Face-to-face meetings with local residents/headman/nearby facilities upon a grievance or if needed • Newspaper advertisements if needed 	ELZ A.Ş. and Contractor of ELZ A.Ş.
	Governmental authorities	<ul style="list-style-type: none"> • Face-to-face meetings with MoH as needed and other authorities related to permitting issues • Official written correspondence with authorities 	
	Construction workers	<ul style="list-style-type: none"> • Implementation of grievance mechanism • Training on environmental, health and safety aspects • Consultation related to implementation of relevant management plans (i.e. Construction Camp Management Plan) 	Contractor of ELZ A.Ş.
Operation	Neighboring land users and local communities	<ul style="list-style-type: none"> • Making comment/complaint forms available at the security gates 	Service Provider of ELZ A.Ş. or MoH – depending on the subject of comment/complaint
	Employees of ELZ A.Ş.	<ul style="list-style-type: none"> • Project website to disclose Project information and Project updates • Newspaper announcements, if needed • On-going communications with relevant regulatory stakeholders and public, as necessary • Implementation of the Grievance Mechanism 	ELZ A.Ş. and Service Provider of ELZ A.Ş.
	MoH staff	<ul style="list-style-type: none"> • On-going meetings with the administrative staff of MoH 	
	MoH staff	<ul style="list-style-type: none"> • Implementation of grievance mechanism 	MoH
	Patients and Patients' visitors	<ul style="list-style-type: none"> • Establishment of a Patient Communication Unit inside the IHC in line with Patient Rights Regulation 	

8.0 SCHEDULE FOR ESTABLISHMENT OF THE PROJECT

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

Milestone	Schedule
Development of the Draft ESIA Report	April, 2015
Development of the Final Draft ESIA Report (version for disclosure)	Mid August, 2015
Final Draft ESIA Report disclosure	Mid August 2015 for a period of 30 days
Public consultation meeting	During the disclosure period of Final Draft ESIA Report
Start of main construction activities	Early fourth quarter of 2015 for a period of 3 years
Start of operation activities	Last quarter of 2017 for a period of 25 years

9.0 GRIEVANCE MECHANISM

A grievance mechanism will be established in order to ensure that all comments, suggestions and objections received from the project stakeholders especially from the nearby surrounding communities and facilities are dealt with appropriately and in a timely manner. It is important to note that there will also be a separate grievance mechanism for workers/employees during construction and operation phases, and for patients during operation phase. It is important to mention that ELZ A.S. will only be responsible for the management of grievances related with the services it provides and also grievances of workers that are working at these services. Grievances related with the health services or grievances by the health personnel will be under the responsibility of MoH.

Local communities will be informed about the grievance mechanism during the consultation and disclosure activities. All grievances will be recorded, responded and resolved in a defined timeframe. The planning of the grievance mechanism is currently at a planning stage. It is expected that comments and grievances can be sent to ELZ A.Ş. via mail, e-mail or fax during the construction and operation stages as well as through the Project website and telephone numbers/call center. A Comment/Grievance Form is presented in Annex A.

The anticipated procedure to handle grievances during construction is described below:

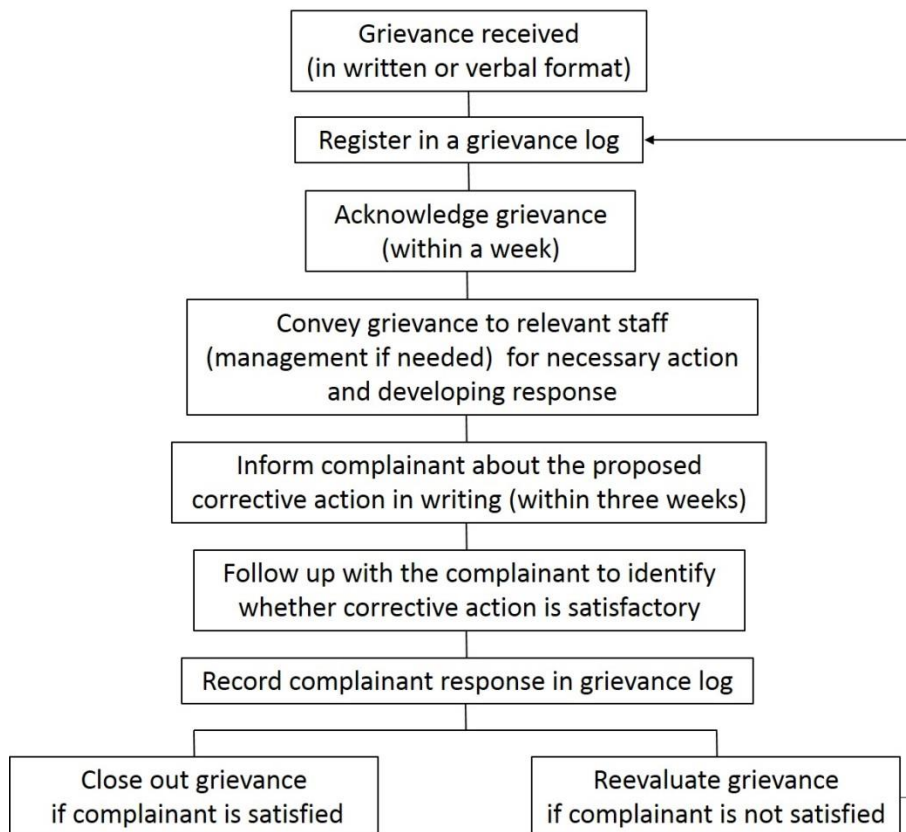
1. All grievances submitted by the stakeholders in verbal and written will be considered. Verbal grievances will be written on grievance forms by the responsible person (i.e. liaison officer).
2. All grievances will be reflected in a grievance log to ensure that each grievance is assigned an individual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

5. The complainant will be informed about the proposed corrective action in writing three weeks after the grievance is acknowledged and the date of response to the complainant will be recorded in the grievance log.
6. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log.
7. The grievance will be closed out and the close out date will be recorded, if the complainant is satisfied with the action taken. If not, further assessment is needed and reevaluation of the grievance is required.
8. It is envisaged that the grievances will be resolved within one month after receipt. If this is not possible, the complainant will be informed about the progress on a regular basis.
9. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.

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

A flowchart for processing grievances is given below.

Flowchart for Processing Grievances



The planning of the grievance management process particularly for operation phase is still ongoing. It is expected that a call center will manage the grievance system of ELZ A.S during operation phase. If any grievance related with health services is obtained, the grievance will be conveyed to MoH and people giving the grievance will be informed about this action accordingly. It is important to note that there is already a hotline (184) known as 'MoH communication center' which is used to submit grievances related with health services all over Turkey. It is expected that this hotline will continue to be used during the operation of Elazig IHC through which MoH can receive grievances.

The contact details for submitting grievances are provided below:

ELZ Sağlık Yatırım A.Ş.

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

E-mail: info@rsy.com.tr

Telephone: 0 312 441 31 41

Fax: 0312 442 59 48

10.0 RESOURCES AND RESPONSIBILITIES

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

M. Gülçin KADIOĞLU ERDOĞAN

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

Phone: +90 312 441 31 41

Email: gulcin.erdogan@ronesans.com

11.0 REPORTING

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

ANNEX A

Comment/Complaint Form

ELAZIG INTEGRATED HEALTH CAMPUS PROJECT- COMMENT/COMPLAINT FORM

INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by ELZ A.Ş.)

Full Name:

Date:

Contact Information: (Please provide necessary information based on how you wish to be contacted)

By mail

By phone

By e-mail.....

Indicate your purpose: Comment Complaint

Recorded by: Person submitting comment/complaint

Other (please specify who)

Signature confirming receipt of completed

Comment/Complaint Form copy

.....

YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)

INFORMATION ABOUT YOUR COMPLAINT

Describe the Complaint (Continue on the back of the sheet if required)

Date of Incident Regarding Complaint

One time incident/grievance (Date

Happened more than once (how many times?

On-going (currently experiencing problem)

What would you propose to resolve the problem? (Continue on the back of the sheet if required)

This section will be filled by ELZ A.Ş.

STATUS OF COMMENT

Comment Logged (Y/N)

Date of submission:

Logged by:

Response Required (Y/N)

Date of response sent:

STATUS OF COMPLAINT

Complaint Logged (Y/N)

Date of submission:

Logged by:

Date of Response sent:

Complaint closed (Y/N):

Close out date and signature:

ANNEX B

Complaint Action Form

(to be used by ELZ A.Ş.)

COMPLAINT ACTION FORM

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