



Stakeholder Engagement Plan for the Eurasia Tunnel Project Istanbul, Turkey

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ERM Group, Germany and UK
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Stakeholder Engagement Plan for the Eurasia Tunnel Project, Istanbul, Turkey.

March 2011

For and on behalf of
Environmental Resources Management

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1 INTRODUCTION

1.1 BACKGROUND TO THE DOCUMENT

This document is the Stakeholder Engagement Plan (SEP) for the Eurasia Tunnel Project. The Project is being developed by ATAS (Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.), who have been selected by the Turkish Ministry of Transport General Directorate of Railways, Harbours and Airport Construction (DLH) to design, build and operate a new road tunnel beneath the Bosphorus linking the European and Asian sides of Istanbul.

The Project will be developed under a Built-Operate-Transfer (BOT) Contract between ATAS and DLH which was formally signed February 2011. Following this a process of informing and consulting the public about the Project commenced on 1 March 2011. This is being carried out in accordance with stringent international standards for stakeholder engagement set by the international financial institutions who will be providing funds for construction of the Project.

The goal is to ensure that adequate and timely information is provided to project-affected people and other stakeholders so that they have an opportunity to voice their opinions and concerns and these concerns can influence project decisions. The Plan aims to define a consistent, comprehensive, coordinated and culturally appropriate approach to stakeholder engagement throughout the development of the Project. ATAS is committed to undertaking this engagement in a manner which is consistent with international good practice, a summary of which is presented at the end of this section.

1.2 OVERVIEW OF THE SEP

This current version (March 2011) of the SEP concentrates on consultation and disclosure activities relating to the Environmental and Social Impact Assessment (ESIA) which is being undertaken to inform investment and design decisions. It also summarises consultations which have been undertaken at earlier stages and outlines engagement activities that will be undertaken by ATAS as part of the later stages of detailed design, construction and operation of the Project. The SEP is being published at the same time as the Draft ESIA Report in order to provide an opportunity for people to comment on the plans for future engagement as well as on the Project.

The SEP is a “living document” that will be updated and adjusted as the Project evolves through the various stages of planning and design, into construction and long term operation.

The rest of the document is organised as follows:

- *Section 2* provides a brief description of the Project as background to the plan;
- *Section 3* introduces the different types of stakeholders who it is considered may be affected by or interested in the Project;
- *Section 4* introduces the various phases within the overall strategy and reviews what has been done to date and what is planned at later stages;
- *Section 5* sets out the detailed plan for the current phase of engagement;
- *Section 6* describes how comments about the Project will be managed and addressed (Comment Management);
- *Section 7* provides details of the procedure that will be followed if anyone has a complaint about the Project or the process of engagement (Grievance Management);
- *Section 8* explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

Overall the plan is targeted at ensuring that all affected and interested parties are:

- provided with information which enables them to understand the Project and how it is likely to affect the environment and society; and
- offered opportunities to express their views as to how adverse impacts could be mitigated and managed and benefits optimised at a time when they can still have an influence on how the Project is designed and implemented.

The SEP is the responsibility of ATAS and ATAS is fully committed to transparency and accountability in its implementation. Some information will be kept confidential (e.g. market sensitive information, information relating to personal affairs of individuals) but the overall objective will be to operate a transparent and fair engagement strategy for the Project.

Standards for international best practice on Public Consultation can be established by reference to various documents published by lenders who may be involved with the Project including:

- EBRD's *Environmental and Social Policy*, 2008 ⁽¹⁾ ;
- EBRD's *Performance Requirement 10 on Information Disclosure and Stakeholder Engagement*; and
- EBRD's *Stakeholder Engagement Plan Draft Guidance Note*, January 2009;
- EIB's *Statement on Environmental and Social Principles and Standards* 2009;
- IFC Performance Standard 1, 2006;
- *The Equator Principles: A financial industry benchmark for determining, assessing and managing social & environmental risk in project financing*, 2006 ⁽²⁾.

EBRD, EIB and the Equator Principles Financial Institutions are all committed to community engagement that ensures the free, prior, and informed consultation of affected communities, that is free of manipulation, interference, coercion, and intimidation, and that is conducted on the basis of timely, relevant, understandable and accessible information, provided in a culturally appropriate format.

In summary international standards require:

- the *identification of people or communities* that are affected by the project, as well as other interested parties;
- *meaningful consultation* with project-affected or other interested parties on environmental and social issues that could potentially affect them;
- disclosure of appropriate information and appropriate notification about this disclosure at a time when stakeholder *views can still influence the development of the project*;
- stakeholder consultation during *all project stages*, and starting *as early as possible* during Project planning and preparation;
- operation of procedures by which people can *submit comments and complaints*; and
- maintenance of a *constructive relationship* with stakeholders on an ongoing basis through meaningful engagement during project implementation.

In Turkey, consultation regarding projects of the type proposed here is usually governed by the Republic of Turkey's Environmental Impact Assessment Regulations of 17.07.2008; Official Gazette No. 26939. It must, however, be noted that in 2007 the Ministry of the Environment and Forests concluded that the Eurasia Tunnel Project was excluded from the requirement for EIA under the 2003 Regulations applying at that time. There has therefore been no statutory requirement for consultation under Turkish law. In developing the, SEP consideration has nevertheless been given to the requirements that would have to have been met had the Project been subject to the 2008 EIA public consultation requirements in Turkey.

(1) www.ebrd.com/pages/about/principles/sustainability/standards.shtml

(2) <http://www.equator-principles.com/principles.shtml>

The Project will involve the construction of a 5.4 km twin deck tunnel beneath the Bosphorus running from Cankurtaran Coast on the European side to D100 Eyup Aksoy Junction on the Asian side, together with widening of approach roads to the tunnel along Kennedy Caddesi and the D100 Istanbul-Ankara State Highway. *Figure 2.1* below illustrates the location of the Project in Istanbul. The route will cover a total distance of 14.6 km.

Figure 2.1 *Location of the Eurasia Tunnel Project*



Once widening is complete the approach roads will be transferred to and operated by the Municipality. ATAS will then continue to operate the tunnel as a tolled crossing for approximately 26 years under contract with the Ministry of Transport. A fuller description of the Project can be found in *Chapter 2* of the ESIA Report (available on the Project website: www.avrasyatuneli.com).

The current design of the Project was initially developed by DLH and then by ATAS. With formal appointment of ATAS as the BOT Contractor for the Project, ATAS will now develop the design to a detailed level with a view to starting construction during 2011. The tunnel is expected to open in 2015.

3.1 INTRODUCTION

For the purposes of this plan, a stakeholder is defined as any individual, organisation or group who is potentially affected by the Project or who has an interest in the Project and its impacts ⁽¹⁾. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“affected parties”), or have an interest in the Project (“other interested parties”).

As part of this a particular effort must be made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the project or who may have difficulty participating in the process.

Stakeholder identification is also an ongoing process, and will require regular review and updating as the SEP proceeds.

3.2 STAKEHOLDER IDENTIFICATION FOR THE EURASIA TUNNEL PROJECT

Table 3.1 identifies a number of different groups of stakeholders who are considered likely to be affected by or interested in the Eurasia Tunnel Project. These have been identified through the baseline studies and impact predictions undertaken as part of the ESIA for the Project and also through a search for governmental and non-governmental organisations with responsibilities and interests relevant to the Project and its impacts.

A list of the organisations and individuals identified to date in each group is presented in *Annex A*. This list will be kept up to date if new stakeholders are identified during the course of the programme. Contact details of individual stakeholders have also been compiled by the ESIA Team to enable the project to readily communicate with each stakeholder. This information will be retained, but will not be shared with any third party.

(1) This is considered to be equivalent to the definition of "the public concerned" as discussed in the 2000 Implementation Guide to the Aarhus Convention (UN/ECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (see <http://www.unep.org/env/pp/acig.pdf>))

Table 3.1 Identification of Stakeholder Groups

Stakeholder Group	Description of stakeholder group
1. Owners of land and buildings within the project footprint	This group of stakeholders includes all those who own land or other assets that will be permanently acquired for development of the Project either by voluntary acquisition or involuntary expropriation, and those whose land is temporarily occupied during construction. Based on the current design, this group could include a small numbers of owners of private commercial and mixed residential/commercial property, sports facilities and mosques whose land may be affected, the Municipality of Istanbul, and other state organisations. Final details of who will be directly affected will be determined during detailed design phase. The aim in detailed design will be to avoid displacement of people and businesses as much as possible.
2. Tenants and other occupiers of land and buildings within the project footprint	Residential and commercial tenants and other occupiers of land/buildings that may be acquired or temporarily used for the Project. This group could include tenants with formal leases, those who occupy premises on a more informal basis and are therefore potentially more vulnerable, and possibly marginalised groups such as illegal squatters and homeless people using land and buildings along the route. Final details of who will be directly affected will be determined during detailed design phase.
3. Owners, occupiers and users of buildings near the project and businesses operating in the neighbouring areas	This group includes occupiers of residential, business and other buildings and other businesses (e.g. tourist operators, market stall operators) near the approach roads who could be adversely affected by disturbance during construction or by increased traffic during operation. Affected buildings include homes and business premises with both formal and informal occupiers, but also potentially more vulnerable locations such as hospitals, schools, places of worship, shelters, etc. Based on the assessment of impacts the corridor within which people could be affected by the project extends to between 50 and 100 metres from the road so all premises within 50 metres and vulnerable premises within 100 metres are considered to fall within this group.
4. Users of land and facilities within and adjacent to the project footprint	This group includes people who use the land within and near the project for access and/or recreation whose activities may be disrupted by construction and/or operation of the project. It includes users of the coastal park (walkers, joggers, parents with small children using the playgrounds, leisure boat users, people using the sports facilities, fishermen, and the general population who enjoy the park), people accessing Yenikapi ferry terminal across Kennedy Caddesi, other people crossing the approach roads and people using public transport along the roads on both European and Asian sides. People with disabilities and parents with young children (e.g. in prams and pushchairs) may be affected differently from the general public.
5. Road users and ferry passenger	This group includes car travellers, truck drivers, other users of the approach road routes and ferry passengers whose travel may be disrupted or who may benefit from introduction of the new crossing of the Bosphorus.
6. The general public and business community	Residents throughout Istanbul and further afield could have views about the environmental and social impacts of the Project on the city. Interests may relate to travel benefits, loss of green space, environmental, social or economic impacts, or business or professional interests.

Stakeholder Group	Description of stakeholder group
7. Disadvantaged and marginalised people	Within all the groups above there may be people who may have particular difficulty participating in the engagement process because of language, literacy, mobility, economic or other barriers. These groups are being identified by contact with the community leaders in each neighbourhood along the route (see below).
8. Community leaders	Each neighbourhood (or quarter) in Istanbul is represented by an elected Muhtar who deals with local administrative matters and can represent and provide a link into the local community. Muhtars have been approached to assist in identifying vulnerable and disadvantaged groups in the local population who may not be able to access the stakeholder engagement process by conventional means. Other key figures in the community can include Imams and school teachers. The 25 neighbourhoods located along the route are identified in <i>Table 5.1</i> .
9. Transport providers	This includes bus and minibus operators who currently have stop and interchange facilities at Yenikapi and elsewhere along the route that could be disrupted during construction. Minibus operators may also benefit from being able to use the tunnel. It also includes ferry operators providing cross-Bosphorus services that could be affected by opening of the tunnel and ferry operators who may experience disruption at Yenikapi during construction. They will be contacted via the municipal ferry operations departments and relevant associations of minibus operators.
10. National Government Organisations.	National government organisations (ministries, agencies, services) with regulatory functions relating to the Project (permitting or supervision) or providing infrastructure and services relevant to the project. A list of relevant departments is provided in <i>Table 5.1</i> .
11. Provincial Government Organisations.	The Provincial governor and functional departments within the provincial administration with responsibilities delegated from national government, relevant to the Project. A list of relevant departments is provided in <i>Table 5.1</i> .
12. Municipal and District Government.	The Mayor and departments of the municipal government in Istanbul and district governors and administrations within the city with responsibilities relevant to the Project. A list of relevant departments is provided in <i>Table 5.1</i> .
13. Local, National and International environmental and sustainability NGOs.	Organisations with interests in the environmental and sustainability aspects of the project (pollution, waste, resources, biodiversity, birds etc) and cultural heritage issues, who aim to represent the views and interests of their members and/or the general public. A list of relevant organisations identified to date is provided in <i>Table 5.1</i> . Others will be added if they are identified from their response to the public engagement activities.
14. Local, national and international social NGOs.	Organisations with interests in the social, community, labour health and safety or other similar aspects of the Project who aim to represent the views and interests of their members and/or the general public. Social NGOs will include those representing the interests of vulnerable groups (e.g. disabled people, women, homeless etc.). A list of relevant organisations identified to date is provided in <i>Table 5.1</i> . Others will be added if they are identified from their response to the public engagement activities.

Stakeholder Group	Description of stakeholder group
15. Business and professional associations.	Business and professional organisations with an interest in the project and its impacts who aim to represent the views and interests of their members. Also includes research and educational organisations with academic/professional interests in issues raised by the Project. A list of relevant organisations identified to date is provided in <i>Table 5.1</i> . Others will be added if they are identified from their response to the public engagement activities.
16. International financial institutions.	Multilateral, bilateral and private sector financial institutions providing project finance for construction of the Project. Engagement activities will be directed to all members of the lender group.
17. National and local press, TV and radio	Various national and local (where relevant) media outlets and organisations.

4.1**INTRODUCTION**

This section provides an overview of the main phases of the overall approach to stakeholder engagement for the Project. This is described in five main Phases.

- *Phase 1: Pre-ESIA Consultations*
- *Phase 2: ESIA Study Consultations*
- *Phase 3: Draft ESIA Disclosure*
- *Phase 4: Detailed Design and Construction*
- *Phase 5: Operation.*

The approach to each of these phases is discussed in this section and the results of the first two phases which are complete are summarised.

4.2**PHASE 1: PRE-ESIA CONSULTATION (MARCH - APRIL 2009)**

In Phase 1, engagement was undertaken by DLH and ATAŞ following selection of ATAŞ as the preferred bidder for the BOT Contract and prior to appointment of the ESIA Team. The objective at this stage was to introduce the Project to key national and local government agencies and to initiate discussions about its key environmental and social impacts.

Contact was made with national, municipal and local authorities including the Ministry of Public Works and Settlement, the Ministry of Transportation General Directorate of Highways, the Ministry of Transportation Istanbul Regional Transportation Directorate, and the Ministry of Culture and Tourism General Directorate of Cultural Heritage and Museums, together with the Mayor and various Directorates of the Istanbul Municipality, municipal districts in the vicinity of the Project, and the four Protective Councils with responsibilities for cultural heritage assets in Istanbul.

This was followed-up with a meeting and presentation to which these organisations were invited. The results of these meetings were not formally recorded, but the key concerns raised by local government departments at city and district levels and by the Protective Councils, were about:

- the potential adverse impacts of traffic and vibration from the Project on sites of archaeological and historic importance; and
- the effect of the Project on the setting of the old city and its skyline.

4.3

PHASE 2: ESIA CONSULTATIONS (OCTOBER 2009 - JANUARY 2011)

After appointment of the ESIA team in September 2009 further consultations were initiated with government organisations and international project finance institutions who might be involved in lending to the Project to assist in scoping the ESIA and providing information during the course of the assessment studies.

To provide information to the government agencies consulted at the start of the assessment, a short Project Information Document (PID) was produced in Turkish and English and sent in November 2009, to all the authorities contacted in Phase 1 plus further agencies with potential interest in the Project identified once the ESIA process commenced. These included additional national ministries and departments within Istanbul Metropolitan Municipality (Health and Social Services, Seafood Wholesale Market, Environmental Protection and Control, Physical Development Planning). The full list of organisations contacted is provided in Annex G of the Draft ESIA Report.

The PID was accompanied by a letter requesting comment on the Project, its potential impacts and the scope and approach to the ESIA, and requesting information relevant to the ESIA. The aim was to generate feedback on the proposed scope, approach and key issues to be addressed in the ESIA and on recommendations on mitigation and monitoring. The letter requested responses by December 2009 but in fact responses continued to be received until the summer of 2010 and all were taken into account in drafting the ESIA which is being disclosed at the same time as this version of the SEP. Following the submission of the PID, various requests for further information and clarification were also received and addressed.

In parallel with this, a Scoping Report was prepared at the end of October 2009 describing the Project, outlining the proposed scope of the ESIA, identifying likely impacts and potential mitigation measures, and proposing an approach to further consultation. This Scoping Report was provided to known potential Lenders at this time and comments were received on the identification of likely significant impacts and the proposed approach and methods for the assessment.

The comments raised in Phase 2 are detailed in the Annex G of the Draft ESIA Report and mainly focussed on:

- the potential for archaeological impacts and damage to historic structures;
- protecting the historic skyline of Istanbul;
- impacts on traffic;
- management of air emissions, wastewaters, and waste including excavated spoil;
- protection of designated areas and other sensitive sites including the marine environment;
- management of emergencies in the tunnel; and
- impacts on existing land uses and users.

A particular focus for engagement in the second half of 2010 was the four Protective Councils responsible for cultural heritage along the Project route and the Ministry of Culture and Tourism, whose opinion was required prior to signature of the BOT Contract. The Protective Councils have a statutory role in the protection of various aspects of the cultural heritage of Istanbul. The Protective Councils and the Ministry received information on the Project and extracts from the draft ESIA findings, including proposals for mitigation measures to minimise impacts on the various historic and archaeological interests of Istanbul. Positive opinions were received from the Protective Councils in September/ October 2010. Further details can be found in Chapter 11 of the Draft ESIA Report.

In preparation for the current phase of disclosure of the Final Draft ESIA Report (Phase 3), meetings were held with the Muhtars (neighbourhood leaders) representing 25 neighbourhoods along the route. The objective was to ensure that they were aware of the Project in advance of the formal disclosure, to check that the ESIA had covered the main issues expected to be of concern in their neighbourhood, to seek their assistance in the disclosure programme, and to ask for their help in identifying any particular issues and any groups within their community who might require special attention to ensure they can participate effectively in the disclosure and comment process. These meetings included a presentation providing information on the Project, its background, key ESIA findings and the forthcoming public consultation process. This was then followed with questions on their initial opinions of the Project, the public consultation programme and any other issues which are of interest to them and the local community.

The 25 neighbourhoods are spread across four districts of Istanbul, shown below in *Figure 4.1*.

Figure 4.1 Four districts of Istanbul containing the Project



The neighborhoods within each of the four districts are listed in *Annex A*.

The main points which emerged from the consultations with Muhtars are summarized below:

- they proposed various locations within their neighbourhoods for making public consultation information available (e.g. posters and leaflets). They are also willing to assist the consultation through their offices;
- there are approximately 250 “apartment buildings” within 50 metres of the Project route, according to Muhtars. Almost 75% of these are within the Fatih neighbourhood on the European Side;
- they did request that follow-up meetings be provided to Muhtars as the Project progresses;
- regarding vulnerable groups they identified a small population of homeless people in the Fatih district on the European Side;
- they recommended locations for the public reading rooms and exhibitions and suggested various locations where advertisements for the public consultation programme could be placed which have been taken into account in planning the activities described in *Section 5*;
- they noted that the internet would be a useful medium for consultation but that paper copies of material was also important (especially on the European Side).

4.4 *PHASE 3: DRAFT ESIA DISCLOSURE*

This is the current phase of the Stakeholder Engagement Strategy and is focussed on bringing affected and interested parties outside government into the process. This phase will last a minimum of 2 months. The aim is to ensure all stakeholders have an opportunity to express their views and for these views to be taken into account in decisions on financing for the project and in the detailed design work and construction planning which will commence once financing is secured.

The stakeholders who will be consulted are identified in *Section 5* and a detailed action plan explaining how each group will be engaged is presented. The procedure that will operate to ensure comments are fed into the design and decision-making about the Project is described in *Section 6* and separate process focussed specifically on any grievances that may arise is detailed in *Section 7*. The grievance process will be open to people, organisations, authorities and, in due course, people working on the Project, who wish to make a formal complaint regarding any aspect of the Project.

On completion of the disclosure and comment period the ESIA Report will be updated to reflect the results of consultation and comments will be fed into the future work on detailed design and construction of the Project. The Final ESIA and the Environmental and Social Management Plan will then be published on the Project Website (www.avrasyatuneli.com).

4.5 *PHASES 4 AND 5: DETAILED DESIGN, CONSTRUCTION AND OPERATION*

The final phases of stakeholder engagement will commence once financing for the Project is approved and will continue through approximately 40 months of detailed design and construction (Phase 4) and then into operation over the 26 year lifetime of the BOT contract (Phase 5).

Engagement after disclosure of the ESIA will be taken forward by ATAŞ as a fundamental part of success in project implementation. Stakeholder feedback will be a key component in monitoring the success of mitigation measures.

The format and engagement techniques for these future phases of engagement are not yet finalised, but at a minimum, will include:

- disclosure of the Final ESIA and Environmental and Social Management Plan on the Project website for the duration of the Project , highlighting changes in the Project and plans for environmental and social mitigation and monitoring made in response to comments on the draft documents;
- further consultation with people affected directly by the occupation and acquisition of land and property for the Project (DLH will have responsibility for land acquisition but ATAS will work with DLH to ensure appropriate consultation with affected people in accordance with the Project Resettlement Policy Framework);
- quarterly Project updates and progress information for the local community. These project updates will be made widely available in the community via Muhtars' offices and other public places and on the Project website;
- announcements and information for the local community on construction activities including any activities likely to cause particular disturbance (such as temporary road closures, particularly noisy activities etc.). These announcements will be made through press releases to local media, a community newsletter distribute through Muhtars' offices and other public places, information provided directly to affected households and businesses, and updates on the Project website; and
- Ongoing maintenance and availability of the Comment Process (*Section 6*) and Grievance Procedure (*Section 7*).

5 *DRAFT ESIA DISCLOSURE*

5.1 *INTRODUCTION*

This section provides information on Phase 3 of the Stakeholder Engagement Strategy – public disclosure of the Draft ESIA Report and this SEP. Any individual or group wishing to make comments on the various documents is invited to do so as part of the current disclosure process. There are multiple ways in which to engage with the stakeholder process and these are discussed in this section.

5.2 *DRAFT ESIA DISCLOSURE*

The principal aim in Phase 3 is to provide an opportunity for all affected and interested parties to comment on the project and the draft findings of the Environmental and Social Impact Assessment before decisions are made about the funding and final design of the Project. Phase 3 is designed to comply with national and international good practice for the formal public disclosure of the draft ESIA findings as part of the ESIA process. The engagement process in this phase will aim to reach all the different types of potentially affected and interested parties with the objectives of:

- informing all potentially affected and interested parties about the Project and the draft findings of the ESIA;
- offering a meaningful opportunity to comment on and influence the Project so as to mitigate its adverse impacts and maximise its benefits;
- informing the public about how they can comment and what will be done with their comments; and
- informing the public about the availability of a grievance mechanism for the Project and explaining how this will operate and how it can be accessed.

The draft ESIA disclosure period will start on 1 March 2011 and consultation will last for 2 months, ending on 2 May 2011. The programme of actions to be undertaken during this 2 month period is set out in *Table 5.1* and this identifies the stakeholder groups which are to be targeted by each action. The key activities are briefly described below.

- A free Project leaflet will be distributed to every household, place of work and other building within 50 metres of the boundaries of the Project, and to sensitive buildings (schools, hospitals, residential care homes, place of worship, etc) within 100 metres and homeless people living near the route. In public buildings (hospital etc.) multiple copies of Project leaflets will be made available.
- There will be wide publicity for the Project in the media through two newspaper notices to be issued on two different days and ongoing media briefings. Project posters will be placed in public locations along the route including in all Muhtar offices, coffee shops, various community centres and post offices.
- Two permanent reading rooms will be available on the European and Asian sides for the duration of the consultation period. Here, people can look at hard copies of all the draft ESIA documents and other consultation materials and leave comments. These will be open 6 days a week, during normal business/working hours on Monday – Friday (9am to 5pm), with an extension on Friday evenings to 8pm, and on Saturday from 10am to 4pm.
- Shorter public exhibitions will also be held at locations on the European and Asian sides at which visitors can also look at information about the Project, ask questions and leave comments.
- A Project telephone hotline will be available which will be staffed during normal working hours and will take messages outside working hours.
- Information will also be available on a dedicated Project website (www.avrasyatuneli.com) and this will be widely advertised in the leaflets, public posters, newspapers and in Muhtars offices.

Neighbourhood Muhtars have been fully briefed on the range of consultation and communication approaches to be used so that they can inform and raise public awareness of the consultation process and advise the public where to go for further information.

An overall programme for the various events and activities during the 2 month consultation period is provided in *Figure 5.1* and the specific timings and venues for events are presented in *Annex B*.

Table 5.1

Stakeholder Engagement matrix for Draft ESIA Report Disclosure

Activity/Element	Description	Stakeholder groups																
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
1. On line publication of all documents on the Project website	<p>The Draft ESIA Report, Non-Technical Summary (NTS) and other public information documents (Project Summary brochure, leaflets, posters etc) will be available in digital format (as pdf files) on the Project website (www.avrasyatuneli.com).</p> <p>The Project website will provide an email address (esia@avrasyatuneli.com) where written submissions can be emailed and a postal address for written submissions:</p> <p><i>Eurasia Tunnel Project ESIA Consultation Kutadgu Consultancy Caferağa Mahallesi, Safa Sokak, No:6, Kadıköy, Istanbul</i></p> <p>The comment and grievance mechanisms (see Sections 6 and 7) will be explained and the Project website will give details of the procedure for handling comments and grievances.</p>	All stakeholder groups																
2. Reading Rooms	The Draft ESIA Report, NTS and other public information documents will be available in hard copy for public inspection at two public locations (Reading Rooms). In both locations, a Comment Book and Comment Forms will be provided for people to register their views. Locations and opening hours (see Annex B) will be detailed in all public consultation materials (including newspaper notices, public leaflets and posters: see below).	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
3. Distribution of Documents	<p>Hard copies of the NTS and other materials will be available on request free of charge from the ETP Consultation Team. Copies of the full ESIA Report will be available to purchase at the cost of printing (100TL) plus postage or free on CD on request.</p> <p>All these various materials can be obtained on the website, by calling the hotline (see below), by emailing 'esia@avrasyatuneli.com' or by writing to the address provided in #1 above.</p>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
4. Project information 'hotline'	A project information hotline (0 216 700 14 14) will be in operation for the duration of the 2 month consultation period. It will be manned during normal business hours in Istanbul, and outside of these an answer phone facility will be available so callers can leave a message and if needed can be	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	

	<p>The leaflet and poster will provide a link to the Project website, give details of the reading rooms and exhibitions, invite interested parties to make a written submission if they wish, and provide contact details for further information.</p> <p>The grievance mechanism for the Project will be advertised in the leaflet. Digital versions of the leaflet and poster will be available on the Project website.</p>																		
8. Public Information Exhibitions	<p>A staffed exhibition displaying maps, posters, Project video and copies of Project ESIA & NTS, plus free copies of NTS, Project Summary and leaflets will be held at 2 locations on the European and 1 location on the Asian Side. The locations and opening hours for the exhibitions are set out in <i>Annex B</i>. Locations have been selected as being easily accessible and free to enter. A Comment Book and Comment Forms will be available for people to leave their views and all comments conveyed in discussions with staff will be noted by the project staff.</p> <p>The exhibitions will be advertised within the formal newspaper notices and public leaflets and posters and on the project website</p>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
9. Special actions	<p>Muhtar consultations revealed that there are some homeless people living in the Fatih district of Istanbul (European side). To ensure that this vulnerable stakeholder group is consulted, leaflets (See #7 above) will be specifically provided to these people as part of the overall distribution of leaflets to all dwellings and businesses within 50 m of the Project.</p> <p>If other stakeholders identify additional special and vulnerable groups within the community who will require particular measures to engage them in the process during the consultation process, the team will identify an appropriate means of making contact, explaining the Project and understanding their views.</p> <p>Vulnerable locations such as hospitals, places of worship, schools etc located near the route will receive copies of the leaflet (see #7).</p>																		
10. Comment Form	<p>A pre-printed Comment Form (see <i>Section 6</i> and <i>Annex C</i>) will be made widely available at all consultation venues and on the website which stakeholders can use to submit their comments. Comments can also be provided orally, by email or by telephone and will be logged by the consultation team. Comments from individuals can be provided anonymously if wished.</p> <p>A separate Grievance Form will be used if a stakeholder wishes to record a complaint about the project or the process (see <i>Section 7</i> and <i>Annex D</i>).</p>	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

Figure 5.1 Phase 3 (Draft ESIA Disclosure) programme

	Activity	Pre-start	Day 1-10	Day 11-20	Day 21-30	Day 31--40	Day 41-50	Day 51-63	Later
0	Pre-meetings with Muhtars to brief on process								
1	Online publication of ESIA and consultation materials								
2	CD ESIA, NTS and Project Summary available on request								
3	Reading Rooms open and hard copy availability to purchase								
4	Availability of copies of documents								
5	Project information 'hotline'								
6	Formal newspaper notices		•	•					
7	Leaflet distribution and posters in public places								
8	Issues of letters and Project Brief to government agencies and NGOs								
9	Follow up meetings as requested								
10	Special measures for vulnerable/marginalised groups if needed								
11	Public Information Exhibitions								
12	Maintain stakeholder register and provide responses as required								
13	Discuss comments with ATAS/DLH and agree responses								
14	Revise and issue Final ESIA and ESMP								

6.1

OVERVIEW

It is essential that all comments, suggestions, concerns and submissions received during stakeholder engagement are considered and addressed in a transparent and fair manner that is consistent with good practice. To ensure this, a Comment Management Process has been developed detailing how comments will be managed and addressed as part of the overall stakeholder engagement process and this will be implemented during this and later phases of the strategy.

The object of the Comment Management Process is to ensure that all comments and suggestions received are given due consideration and, where appropriate, a timely response is provided to the stakeholder explaining how the Project proposes to address the comment. The comment process will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner.

6.2

RECORDING AND TRACKING OF COMMENTS

The Comment Form presented in *Annex C* will be made widely available for people and organisations to submit comments during Phase 3 and afterwards. Comments made by any other means (phone, email, letter, in person) will also be logged on comment forms by the person receiving the comment. People making comments will be asked to give their name and contact details to facilitate contact with them later in the Project, but they will also be able to remain anonymous if wished. A register of those visiting reading rooms and exhibitions, and those requesting information, will also be kept although they will also be allowed to remain anonymous if wished.

A confidential Comment Log will be kept of all contacts with the Project, recording comments made and how these have been addressed. This will be added to the Stakeholder Register already established during Phase 2.

If any stakeholder raises a complaint or has a grievance about the Project or the process this will be addressed through the grievance process described in *Section 7* which will also continue during Phase 4 (detailed design and construction) and Phase 5 (operation).

During Phase 3 the Comment Management process will be operated by the ESIA Team and will run as follows.

1. **Receipt of comment** through personal communication with the ESIA team, phone, letter, comment form, during meeting, or any other means.
2. **Comment is formally logged in the Comment Log** by a member of the ESIA team. If the comment is not well understood or if additional information is required, clarification should be sought during this step.
3. **The comment is reviewed by the Project team** at a weekly review involving ATAS and the ESIA consultants. All comments received the previous week will be reviewed. Where very similar or identical comments are received, they will be collated and treated as a single issue to be considered although each stakeholder raising the comment will be identified.
4. **An appropriate response is developed** by the Project team. Potential actions could include revising the ESIA text, providing further baseline or assessment data, developing additional mitigation or monitoring measures, or revising the design of the Project. Where the Project is unable to take up a suggestion, the reasons for this will be explained in the Stakeholder Register which will be included in the Final ESIA Report and if appropriate a personal response will be provided.
5. **Required actions are implemented** to deal with the issue, and completion of these is recorded on the comment log.
6. **The response is signed-off and closed** by a member of the ESIA team. The sign-off may be a signature on the comment log or in correspondence which should be filed with the comment and referenced in the comment log.

After the end of the ESIA Process the Project Environmental and Complaints Handling Manager will take on responsibility for the Comment Management Process.

The Comment Form is presented in *Annex C*.

7.1

OVERVIEW

A Grievance Management process has been established for the Eurasia Tunnel Project which provides a formal and ongoing avenue for stakeholders who consider their rights or interests have been adversely affected to engage with the Project. A grievance is considered to be any complaint about the way the project is being implemented ⁽¹⁾. It may take the form of specific complaint about impacts, damages or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments have been addressed, concerns about Project activities during construction or operation, or perceived incidents or impacts.

Best practice requires that a grievance management process should receive and facilitate resolution of affected communities' concerns and grievances. Mechanisms should be appropriate to the scale of impacts and risks presented by a project. The grievance management process should address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all sections of the affected community, at no cost and without retribution. The process must not impede access to other judicial or administrative remedies. Affected communities must be informed about the grievance process in the course of community engagement activities, and the Project must report regularly to the public on its implementation whilst protecting the privacy of individuals.

The management of grievances is therefore a vital component of stakeholder engagement and an important aspect of risk management for a project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders.

Monitoring of grievances will signal any recurrent issues, or escalating conflicts and disputes.

(1) They may be distinguished from comments in that they relate to some adverse consequence which the aggrieved party considers he/she has suffered as a consequence of the Project. Comments which do not constitute grievances will all be reviewed, logged, considered by the Project team and if necessary responded to as discussed in *Section 5*.

The grievance process will follow the following key steps:

1. **Identification of grievance** through personal communication with the ESIA team, phone, letter, grievance form, during meeting, or any other route.

Grievance is recorded on the Grievance Form (see *Annex D*) and in the 'Grievance Log' by the Environment and Complaints Manager ⁽¹⁾ employed by ATAS. The Grievance Log will be held at ATAS's office.

Complaints submitted directly to DLH or the Municipality will be re-directed to ATAS and the normal grievance procedure will then begin.

2. **Grievance is formally acknowledged** through a personal meeting, phone call, or letter as appropriate, within 5 working days of submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.
3. **The Environment and Complaints Manager will inform Senior Management, as appropriate and where required.** The Environment and Complaints Manager will support the Project team in deciding who should deal with the grievance, and determine whether additional support is necessary.
4. **The Environment and Complaints Manager formally delegates grievance** in writing to the relevant department(s)/personnel /contractor for development of an appropriate response.
5. **A response is developed** by the delegated team and Environment and Complaints Manager with input from the Senior Management and others, as necessary. Should the need arise, the Project will consider the establishment of a conflict resolution "committee" for the management of complex grievance issues.
6. **Required actions are implemented** to deal with the issue, and completion of these is recorded on the grievance log.

(1) During the ESIA Disclosure phase if any grievances are raised about the process these will be managed by the ESIA Team in consultation with ATAS management as ATAS's Environment and Complaints Handling Manager has yet to be appointed.

7. **The response is signed-off** by the appropriate manager. This sign-off may be a signature on the grievance log or in correspondence which should be filed with the grievance to indicate agreement, and referenced in the grievance log.
8. **The response is communicated to the affected party;** the Environment and Complaints Manager ensures that a suitable approach to communicating the response to the affected party is agreed and implemented.
9. **The response of the complainant is recorded** to help assess whether the grievance is closed or whether further action is needed. The Environment and Complaints Manager will use appropriate communication channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood and is satisfied with the response. The complainant's response will be recorded in the grievance log.
10. **The grievance is closed** with sign-off from the Environment and Complaints Manager, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required the Environment and Complaints Manager will return to Step 3 to re-assess the grievance and then take appropriate action. ATAŞ will seek to resolve grievances within one month. If this is not possible the complainant will be kept advised of progress on a regular basis.

At all times, the complainant will be able to seek other legal remedies available to them in accordance with the laws and regulations of the Republic of Turkey.

The Grievance Procedure will be free, open and accessible to all and comments and grievances will be addressed in a fair and transparent manner. Information about the procedures, who to contact and how, will be made available on the Project website and in other materials. In particular all workers will be informed of the Grievance Process and new workers will be informed when they join the Project. Information on Contact Points will be posted on staff information boards and on site information boards.

The Environment and Complaints Manager will have overall responsibility for the Grievance Procedure throughout the life of the project, and will ensure that external stakeholders and workers are aware of the procedures and that all contacts are handled promptly and responded to in an appropriate and timely manner. Contact details will be widely advertised prior to start of construction. A report will be provided to the Environment and Complaints Committee once

each month and the Committee will review progress with resolution and take action where this is not achieved in accordance with the deadline for responses. The Committee will report quarterly to the Board on operation of the procedures.

Construction contractors and sub-contractors will be required to operate the same system and address grievances in the same manner and according to the same standards. They will be required to provide a report to the Environment and Complaints Committee on a monthly basis reporting all contacts and how they have been addressed.

A summary of the operation of the Comment and Grievance Procedures will be reported annually on the Project Website. This will maintain the confidentiality of individual persons/organisations involved.

The ETP Grievance Form is presented in *Annex D*.

8.1 INTRODUCTION

This section presents an overview of how SEP activities will be monitored and reported.

8.2 STAKEHOLDER REGISTER

All issues raised during ESIA consultation and later stages will be recorded in a logical and systematic way so that they can be tracked through to appropriate resolution and closure. Issues that have been raised during the consultation process to date have been logged in the Stakeholder Register presented in *Annex G* in the ESIA Report and this will be continued during Phase 3 and afterwards and will be developed as a database for managing the issues raised. The register will record:

- a reference number for the stakeholder;
- name and contact details (unless requesting anonymity);
- date of contact(s);
- details of Contact(s);
- issue(s) raised (comment, suggestion, question, complaint, etc);
- proposed response and actions to be taken;
- status (recorded, active, closed).

Where many stakeholders raise similar issues these will be grouped as “issues” and responses to them will be tracked together in a separate section of the register. An appropriate cross-reference will be made in the response column in the main register.

8.3 REPORTING

The current stakeholder, register developed during Phase 2, is published in *Annex G* of the Final Draft ESIA Report.

The full stakeholder, register will not be made public in order to maintain the confidentiality of stakeholders and individuals but ATAS will publish a summary of comments received during the Final Draft ESIA Disclosure period

(Phase 3) and will provide regular updates on engagement activities and outcomes on the Project website during later phases of the Project.

8.4

EVALUATION OF EFFECTIVENESS

The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the SEP. This evaluation will examine the extent to which activities were implemented in accordance with the Plan and the extent to which they achieved the aims defined here. The results and any lessons learned will then be incorporated into further updates of the SEP as the Project evolves and is implemented.

The SEP evaluation will be formalised through using a set of Key Performance Indicators (KPIs) for Stakeholder engagement and the Grievance Process.

1. SEP in place, up to date and available to the public for comment on the ATAS Project website and elsewhere.
2. All planned actions implemented as scheduled.
3. Local residents and other stakeholders are aware of the Project and in particular the planned schedule of activities most likely to affect them (e.g. local construction dates) – as evidenced by spot-check interviews.
4. Information on Comment and Grievance Procedure disseminated and operating as planned.
5. Contractors and Sub-contractors are adopting the same systems.
6. All Contacts receive an appropriate response within 5 working days and all grievances are either resolved within one month or the complainant is informed of the programme for dealing with their complaint; and
7. An Annual Report is posted on the Project website on implementation of the SEP and operation of the Grievance Process.

ANNEX A: STAKEHOLDER LIST (JANUARY 2011)

Stakeholder Group/classification	Details of stakeholders identified to date
1. Owners of land and buildings within the project footprint	Will not be identified individually until design is finalised and land required has been identified. For the current phase potentially affected land owners and occupiers will be contacted with Group 3.
2. Tenants and other occupiers of land and buildings within the project footprint	See Group 1
3. Owners, occupiers and users of buildings near the project and businesses operating in the neighbouring areas	Includes all residential, business premises and community buildings and facilities within 50 metres of the project boundary and all sensitive premises within 100 metres (hospitals, schools, colleges, nurseries, mosques, churches, care homes, shelters, etc). NB includes traders running businesses in the Kumkapi fish market and the wholesale fish market and operators of sports facilities, cafes and market stalls at various locations
4. Users of land and facilities within and adjacent to the project footprint	Includes people using the park (walkers, joggers, sports users, parents with young children, fishermen, marina users), other sports facilities, businesses, cafes, markets, mosques, churches, public transport facilities and pedestrian crossings in the vicinity of the project, and includes residents and visitors to the area.
5. Road users and ferry passenger	People using bus, minibus and ferry services along the approach roads, ferries at Yenikapi and other Bosphorus crossings. Car users along Kennedy Caddesi, the D100 and other main routes connecting with these approach roads.
6. The general public and business community	Any interested member of the general public in Istanbul or further afield
7. Disadvantaged and marginalised people	A small population of homeless people has been identified living near the city sea walls in Fatih District on the European side. A number of potentially vulnerable land uses (hospitals, places of worship and schools) are also located along the route.
8. Community leaders	Muhtars in 25 neighbourhoods along the route: Üsküdar District: Selimiye, Acıbadem, Barbaros, and Ünalın. Fatih District: Cankurtaran, Küçük Ayasofya, Sultanahmet, Nişanca, Şehsuvar Bey, Katip Kasım, Muhsine Hatun, Cerrahpaşa, Aksaray, Kocamustafa Paşa, and Yedikule. Zeytinburnu District: Kazlıçeşme Kadıköy District: Koşuyolu, Acıbadem, Hasanpaşa, Merdivenköy, Dumlupınar, Sahrayıcedid, 19 Mayıs, Kozyatağı, and Bostancı. Imams, other religious leaders, school and college heads and other leaders within the community in these areas will be identified through contact in the community during Phase 3 and will be offered opportunities to engage with the Project if requested.
9. Transport providers	Operators of municipal ferry and bus services (municipal departments IDO, SHAS, IETT) and the association of minibus operators (Istanbul Minibus Operators Trade Corporation). There are many individual private small boat operators offering services across the Bosphorus but at these are mainly targeted at foot passengers and tourists they are not expected to be affected by the Project and will not be contacted other than as members of the local community and general public. There is no association of private boat operators. Notices regarding the Project will be sent to the municipal ferry and bus services and the association of minibus operators for their

Stakeholder Group/classification	Details of stakeholders identified to date
	information.
10. National Government Organisations.	Ministry of Public Work and Settlement Ministry of Transportation Ministry of Transportation, General Directorate of Highways Ministry of Transportation, Istanbul Regional Transportation Directorate Ministry of Environment and Forestry, General Directorate of Environmental Impact Assessment and Planning Ministry of Environment and Forestry, General Directorate of Nature Protection and National Parks Ministry of Labour and Social Security Ministry of Labour and Social Security – Istanbul Branch Ministry of Culture and Tourism, Cultural and Natural Assets Protection High Council Ministry of Culture and Tourism, General Directorate of Cultural Heritage and Museums General Directorate of Social Assistance and Solidarity Fund.
11. Provincial Government Organisations and 12. Municipal and District Government Organisations	Protective Council No 4 Protective Council No 5 Protective Council No 6 Renovation Council Fatih District Municipality Maltepe District Municipality Kartal District Municipality Üsküdar District Municipality Zeytinburnu District Municipality Kadıköy District Municipality Istanbul Governorship Fatih District Governorship State Hydraulic Works, Istanbul 14th Regional Directorate Istanbul Archaeological Museums Istanbul Metropolitan Municipality Istanbul Metropolitan Municipality, Department of Housing and Urban Development, Directorate of Conservation, Implementation and Control Istanbul Metropolitan Municipality, Department of Housing and Urban Development, Directorate of Planning Istanbul Metropolitan Municipality, Department of Environmental Protection and Control, Directorate of Waste Management Istanbul Istanbul Metropolitan Municipality, Department of Health and Social Services, Directorate of Seafood Wholesale Market Istanbul Metropolitan Municipality, Department of Survey and Projects, Directorate of Urban Design

Stakeholder Group/classification	Details of stakeholders identified to date
	<p>Istanbul Metropolitan Municipality, Department of Transportation Directorate of Transportation Planning Istanbul Metropolitan Municipality, Directorate of Environmental Protection and Control Istanbul Metropolitan Municipality, Directorate of Environmental Protection and Control, Directorate of Sea Services Istanbul Metropolitan Municipality, Department of Science Affairs, Directorate of Infrastructure Services Istanbul Metropolitan Municipality Physical Development Planning Directorate of Bosphorus Istanbul Protection Sites Site Management Directorate Istanbul City Special Administration</p>
<p>13. Local, National and International environmental and sustainability organisations and NGOs</p>	<p>UNESCO Turkey National Committee WWF Turkey International Union for Conservation of Nature (IUCN) Nature Association of Turkey BirdLife International Society of Bird Investigations (Kuş Araştırmaları Derneği) Türkiye Anıt Çevre Turizm Değerlerini Koruma Vakfı (Turkey's Monuments, Environment and Tourism Assets' Protection Foundation) TEMA (The Turkish Foundation for Combating Soil Erosion, for Reforestation and the Protection for Natural Habitats) Turmepa (Turkish Marine Environment Protection Association) TÜDAV (Turkish Sea Research Foundation) Istanbul Heritage Committee Archaeologist Association – Istanbul Branch ÇEKÜL (Protection and Presentation Foundation of Environmental and Cultural Values) EMBARQ (The WRI Centre for Sustainable Transportation) History Foundation Istanbul Cultural Heritage Platform İKSV (Istanbul Culture and Art Foundation) Istanbul SOS Europanostr Foundation for the Preservation and Improvement of Fishery Samatya Protection and Beautification Association Yenikapi Yali District Preservation Association Fatih Development and Environmental Association Zeytinburnu Environment and Culture Association Zeytinburnu Environmental Volunteers Association</p>
<p>14. Local, national and international social NGOs</p>	<p>Şefkat-Der (Compassion Society: focusing protects the rights of orphans, weak, homeless, hungry, and poor)</p>

Stakeholder Group/classification	Details of stakeholders identified to date
	<p>Türkiye Yardım Sevenler Derneği (Turkish Charity Society) BEDD (Solidarity Association for the Physical Disabled) Six Dots Foundation for The Blinds KAGIDER (Women Entrepreneurs Association of Turkey) IMECE (Society's Urbanism Movement) IYD (Human Settlements Association)</p>
15. Business and professional associations	<p>TUROB (Touristic Hotels and Investors Association Turkey) IDO Association of Minibus Operators (Istanbul Minibus Operators Trade Corporation) Istanbul Fishermen's Association Kumkapi Touristic Restaurant Owners' Association Historical Peninsula Businessmen's and Managers' Association Zeytinburnu Businessmen's Association Eminonu and Sirkeci Businessmen's Association Chamber of Architects and Chamber of Architects' Istanbul Branch Chamber of Civil Engineers - Istanbul Branch Chamber of Environmental Engineers - Istanbul Branch Chambers of City Planners - Istanbul Branch</p>
16. International financial institutions	All members of the Lenders Group
17. National and local press, TV and radio	Formal advertising of the public consultation events will be placed in national and local papers in circulating on the Europe and Asian sides of the Project. Press releases regarding the Project will be issued to all media.

ANNEX B: DETAILS OF ESIA DISCLOSURE EVENTS

1. Public Reading Rooms:

European side: Org. Nafiz Gürman Cad. No. 217/1A Kocamustafapaşa Mahallesi (Samatya) Fatih İstanbul

Asian side: İETT Bağlarbaşı Ulaşım Müzesi ve Kültür Merkezi – 8 No’lu Oda Gazi Cad. No.22 Selamiali Mah. (Eski Bağlarbaşı İETT Garajı) Üsküdar İstanbul.

These public reading rooms will be open from 9am to 5pm Monday – Thursday, 9am to 8pm on Friday and 10am to 4pm on Saturday during the period from 7 March 2011 to 8 May 2011.

2. Public Exhibitions:

European side: 18 & 19 March and 3 & 4 April 2011 at:

Eminönü Halk Eğitim Merkezi (Public Education Center) – Bab-ı Ali Cad. No.37 Cağaloğlu, Fatih İstanbul

Asian side: 25 & 26 March 2011 at:

İETT Bağlarbaşı Ulaşım Müzesi ve Kültür Merkezi – Mimar Sinan Salonu Gazi Cad. No.22 Selamiali Mah. (Eski Bağlarbaşı İETT Garajı), Üsküdar İstanbul (this is the same location as the Asian Reading Room)

Exhibitions will start at 10am and conclude at 8pm. These locations are illustrated on the maps below.

3. **Project website:** www.avrasyatuneli.com (for obtaining and requesting further information)
4. **Project email address:** esia@avrasyatuneli.com (for making comments and requesting further information)
5. **Project hotline:** 0 216 700 14 14 (for obtaining and requesting further information and for making a comment)
6. **Newspapers where public notices will be placed:**

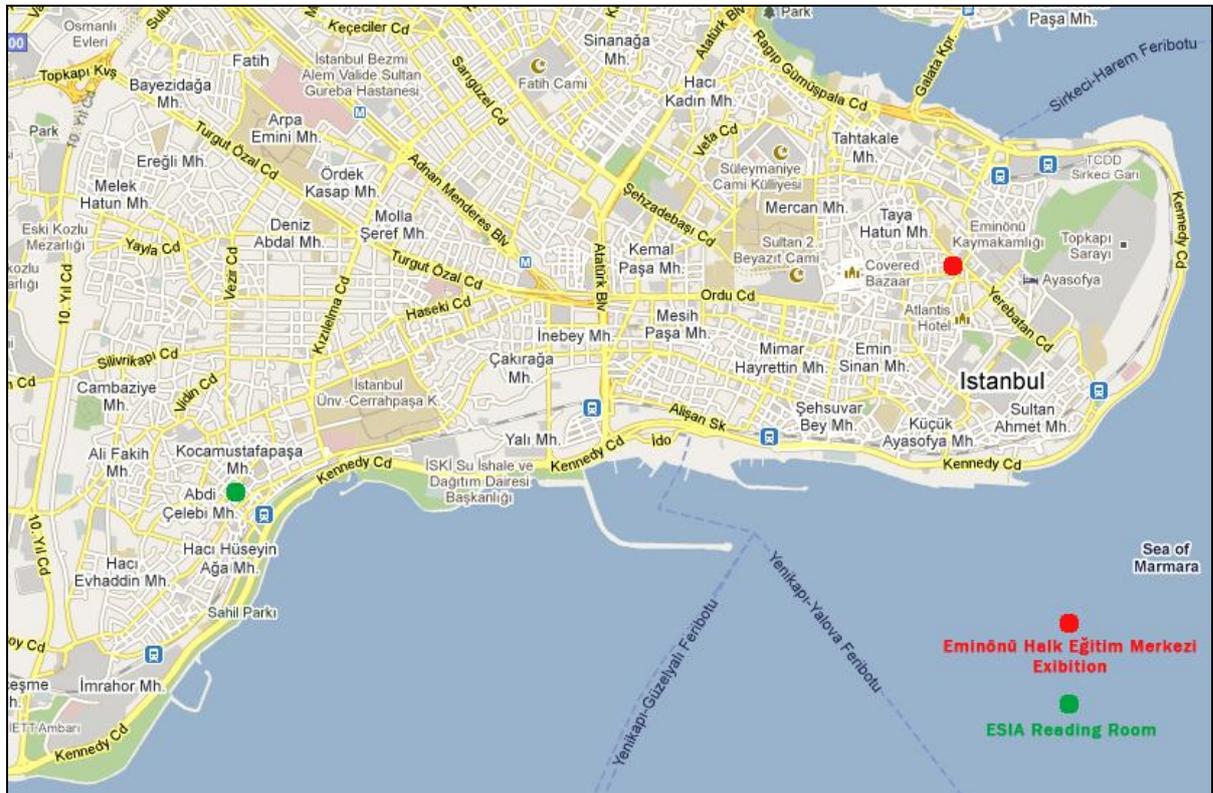
Hürriyet and *Zaman* (these have the greatest circulation and readership along the Project route).

7. **Postal address:** (for requesting further information, making a written comment or purchasing a copy of the ESIA Report):

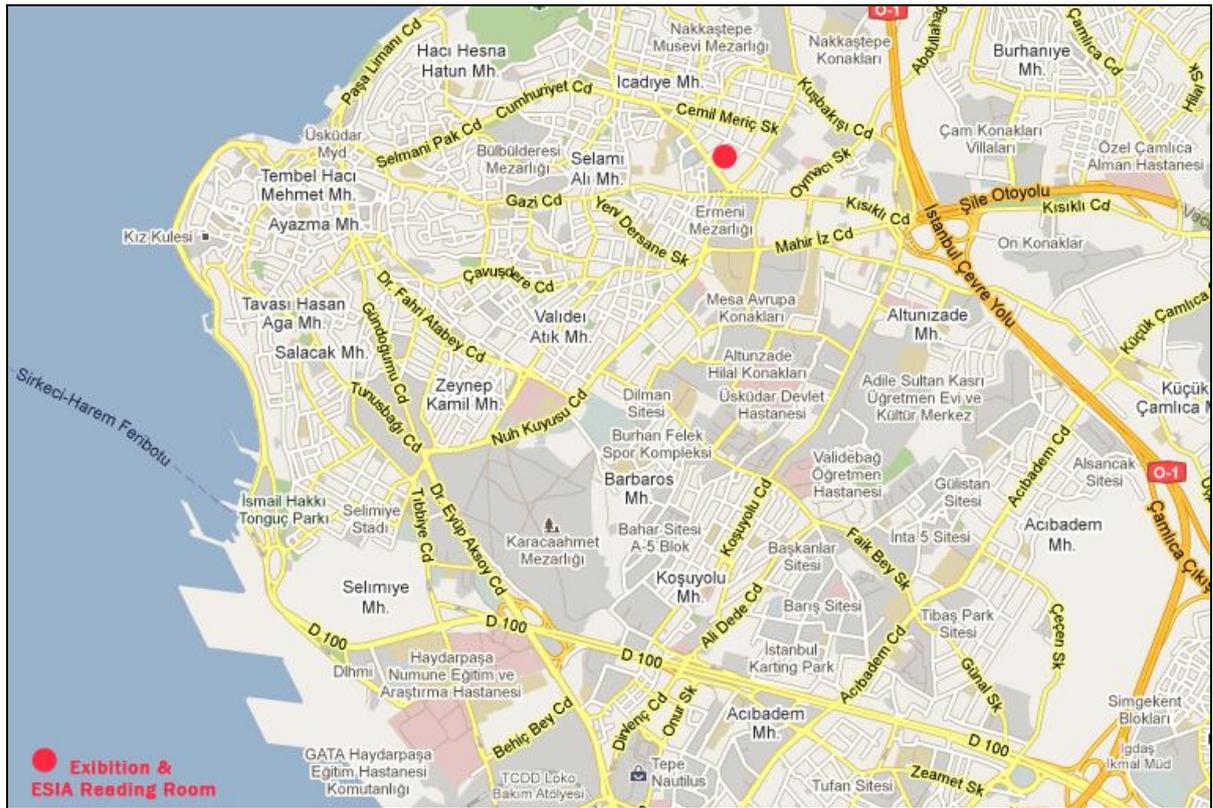
Eurasia Tunnel Project ESIA Consultation
Kutadgu Consultancy
Caferağa Mahallesi,
Safa Sokak,
No:6,
Kadıköy,
Istanbul

Contact details for the grievance procedure will be provided once the ESIA public consultation/disclosure phase has been completed and will be available on the Project website.

European side locations:



Asian side locations:



ANNEX C: COMMENT FORM

Eurasia Tunnel Project: COMMENT FORM			
INFORMATION ABOUT THE PERSON SUBMITTING THE COMMENT			
We would like you to provide your name, address and email if possible, so we can keep you informed about future developments with the Project. However, if you wish to remain anonymous this is not a problem - please just enter ANONYMOUS in the box below - your comments will still be considered by ATAS.			
Name:	Internal use only: how was the comment lodged: <input type="checkbox"/> In person <input type="checkbox"/> By Phone <input type="checkbox"/> At reading room <input type="checkbox"/> By Mail <input type="checkbox"/> By email <input type="checkbox"/> Other (please describe)		
Date lodged:			
Address:			
Email address:			
District/Community:			
YOUR COMMENTS ON THE PROJECT			
INTERNAL USE ONLY: STATUS OF COMMENT			
Comment logged (Y/N):	Date:	Comment number:	Logged by:
Response required	Yes/No	Person responsible for preparing response:	
Response sent (date):		Response logged (date):	

ANNEX D:GRIEVANCE FORM

Eurasia Tunnel Project: RECORD OF GRIEVANCE		
INFORMATION ABOUT THE PERSON SUBMITTING THE GRIEVANCE		
Name:	<i>Internal use only: how was the grievance lodged:</i> <input type="checkbox"/> In person <input type="checkbox"/> By Phone <input type="checkbox"/> At reading room <input type="checkbox"/> By Mail <input type="checkbox"/> By email <input type="checkbox"/> Other (please describe)	
Date lodged:		
Recorded by: <input type="checkbox"/> Person submitting grievance <input type="checkbox"/> Other (please specify who)		
Address:		
Email address:	Do you wish to be kept informed of Project developments? <input type="checkbox"/> Yes <input type="checkbox"/> No	
District/Community:	<i>Internal use only: Confirm that the Grievance has been acknowledged and a copy of this form provided to the complainant?</i> <input type="checkbox"/> Yes. Date:	
Signature of Complainant confirming receipt of completed Grievance Form copy:		
INFORMATION ABOUT GRIEVANCE		
Describe the Grievance:		
INTERNAL USE ONLY: RECORDING AND RESPONSE		
Grievance Reference Number:	Date logged in Grievance Log by Environment and Complaints Manager:	
Name of staff member recording the grievance:	Department and Manager responsible for action to address grievance:	Copies provided to: <input type="checkbox"/> Environment and Complaints Manager (Original) <input type="checkbox"/> Person lodging grievance/ Complainant (Copy 1) <input type="checkbox"/> Person responsible for resolving complaint (Copy 2) <input type="checkbox"/> Senior Management [<i>where necessary</i>] (Copy 3)
Action required (to be updated as needed as the grievance is progressed):		
Deadline for reporting back to Environment and Complaints Manager on progress (to be updated as necessary): Date:	Deadline for reporting back to Complainant on progress (to be updated as necessary): Date:	
INTERNAL USE ONLY: STATUS OF GRIEVANCE		
Date:	Status of Grievance (add further rows as needed):	
Grievance Closed:	Date:	Environment and Complaints Manager Signed off:

ERM has offices across the following countries worldwide

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Chile	Puerto Rico
China	Romania
Colombia	Russia
Ecuador	Singapore
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Germany	South Korea
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