



Mezitli Wastewater Treatment Plant Project

Revised Stakeholder Engagement Plan (SEP)

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1. Introduction

Mersin Metropolitan Municipality was established with Decree Law No. 504 on September 09, 1993. After that, Mersin Water and Sewerage Administration (MESKİ) was established with Council of Minister's Decision No. 95/6750 on May 04, 1995 in order to provide water and sewerage services for Mersin Metropolitan Municipality, to establish all facilities required for the purpose, take over the established facilities and consolidated management of all facilities. MESKİ also conducts activities related with protection of water resources.

MESKİ planned to construct a Wastewater Treatment Plant in western side of the province for the use of Mezitli, Davultepe and Tece Districts.

The Project includes the construction of a WWTP including mechanical, biological and tertiary treatment (nitrogen and phosphorus removal) and sludge treatment (stabilization, dewatering and drying), the construction of pressure lines in the serviced areas between the Mezitli-Viranşehir Pumping Station to the Mezitli WWTP and the construction of a discharge line from the Mezitli WWTP to be connected to the existing deep sea outfall constructed by the Bank of Provinces in 2004-2005 in Viranşehir District. The purpose of the Project is to provide the wastewater treatment plant for the inhabitants in the western part of Mersin metropolitan area, and to prevent polluting the Mediterranean Sea.

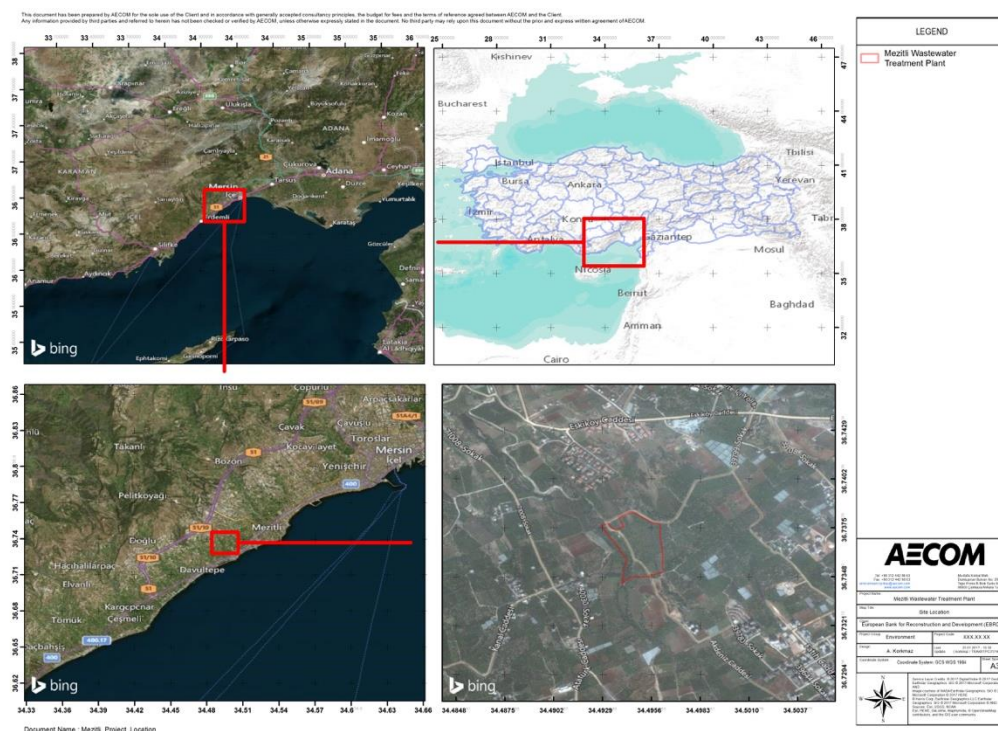


Figure 1-1 Geographic Location of the Project Area

The construction of the Project has been significantly delayed due to some procurement issues. During this time period, the project capacity was increased to 384,000 p.e. for Phase I and 556,000 p.e. for Phase II.

As the revised Project significantly exceeds the initially planned 150,000 p.e. capacity threshold for WWTPs, the EBRD has reassigned it as Category A, which means that a comprehensive Environmental and Social Impact Assessment (ESIA) and review of associated documents must be carried out, followed by their public disclosure. A national Environmental Impact Assessment (EIA) has been prepared for this Project, and has been approved by local environmental authorities.

This document presents the Stakeholder Engagement Plan (SEP) developed for guiding MESKI toward implementing a structured stakeholder consultation and engagement process for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help MESKI develop and maintain over time a constructive relationship with its stakeholders throughout the Project life time. The SEP is comprised of analysis

of stakeholders, planned engagement activities, disclosure plan and grievance mechanism for stakeholders to raise their concerns about the Project.

The SEP has been produced in accordance with the international standards required by the European Bank for Reconstruction and Development (EBRD).

The SEP is a living document and it will be regularly monitored, reviewed and updated by MESKİ throughout all stages of Project implementation.

2. Project Information

2.1. Project Location

Mezitli WWTP is under construction on a 76,600 m² area located within the Mezitli district of Mersin Province, approximately 1.5 km north of the Mediterranean. The pressure and discharge lines are planned to be laid along the existing roads and streets of Mezitli district.

The Project land is owned by Mersin Metropolitan Municipality and a small fraction has been transferred from General Directorate of Highways.

Currently, there are residential properties under construction which are at a distance of approximately 14 meters to the east of the project site.

The location of the proposed Mezitli WWTP, the pressure lines and the discharge line connected to the deep sea discharge in Viranşehir are shown below in Figure 2-1 below.

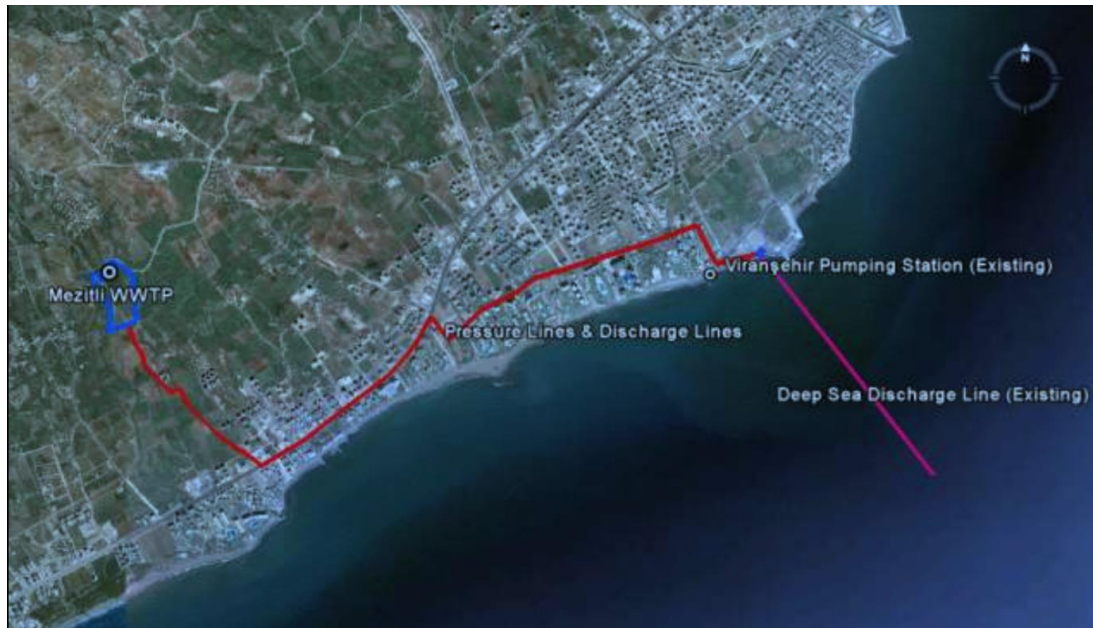


Figure 2-1 Satellite Image of the Project Site Location

2.2. Need for the Project

Direct discharge of urban wastewater into the sea environment is a significant source of pollution in the Mediterranean. Along with rapid urbanization in the coastal zones, coastal municipalities have an important role in preventing land-based pollution of the sea, while providing inhabitants with access to sanitary services.

Mersin is one of the biggest cities on the Mediterranean coast of Turkey. It has the longest seaside and has an estimated 2016 population of about 1.7 Million. Thereby, it is a significant challenge to manage the wastewater collection and treatment services in the provinces.

MESKİ, as a legal entity outside the organization of metropolitan municipality, is the water and sewerage administration of Mersin. With the Law No. 6360 that entered into force in 2014, MESKİ is responsible for providing sanitary services to the whole provincial population, including villages that transformed into neighborhoods as a result of the new metropolitan law.

The Project holds particular importance for MESKİ to increase coverage of sanitary infrastructure and related services, which will eventually contribute to protection of the marine and coastal environment of the Mediterranean.

2.3. Summary of Environmental and Social Impacts of the Project

The Project may pose certain adverse impacts on the environment and communities in its impact zone throughout the construction and operation phases.

Potential socio-economic impacts of the project are; decreased land values, nuisance from noise and dust generation during construction; labor rights, occupational health and safety, nuisance from odor and community issues safety during operation.

The WWTP project site is located on a Treasury owned land which is used for agriculture by the local people. The pressure and discharge lines will pass along the existing streets. Therefore there will be no expropriation needed within the Project. Since WWTP site is owned by the Treasury, the land will be acquired from the General Directorate of National Estate for a fee. Moreover, the compensation of the crops (fruit trees) will also be paid to the local people using these areas for agriculture.

However, a specific concern is related with the new housing zones established with residential buildings constructed and inhabited at a very close distance to the WWTP area. These buildings appeared in the vicinity of the WWTP construction area after the Project construction had started. In other words, the Project was planned for the situation with no housing development. Apparently, the land-owners were not informed formerly about the WWTP when they purchased land and property on adjacent parcels.

As for potential environmental impacts; dust and noise impacts during construction stage will be temporary. Operation stage will be mainly related with odor, chemicals storage, discharge of treated effluent and risks associated with failure of operation such as overflow of sewage. With the implementation of the developed mitigation measures these impacts are not expected to be significant.

2.4. Purpose of this Stakeholder Engagement Plan

The main goal of this 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. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders,
- generate a good understanding of the Project among those that will be affected,
- identify issues early in the project cycle that may pose risks 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.

The SEP also aims to:

- define a consultation approach for stakeholders in relation to construction and operation of the Project,
- identify resources and responsibilities for implementation and monitoring of the consultation program,
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The ultimate purpose of this SEP is to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's

environmental and social impacts. MESKİ is fully committed to undertaking necessary engagement activities related to the Project in a manner that is consistent with international good practice as outlined in next sections.

2.5. Structure of the SEP

Contents of this SEP include the following:

- Project description and key environmental and social issues
- Identification of stakeholders and other affected parties
- Overview of previous stakeholder engagement activities
- Stakeholder engagement plan and methods of engagement
- Grievance mechanism
- Reporting

3. Legal Framework

3.1. Turkish Legislation

The national legal frame for public participation the EIA Regulation which requires public participation for its Annex-I that stands for a list of types of projects with possible significant impacts.

The Project was initially planned in 2005 for a population of 150,000 p.e. for which an EIA Report was not required by the former EIA Regulation (Official Gazette No. 26939, date July 17, 2008). Based on increased population, the planned capacity has been revised to serve a population equivalent of 384,000 for the year 2035.

The amended EIA Regulation of November 2014 requires that an EIA Report is prepared for wastewater treatment plants with capacity over 150,000. Article 9 of the EIA Regulation which requires that a public participation meeting is held for disclosing the project to local stakeholders and for creating the means for communities to express their opinions and ask questions related with the Project's possible impacts and corresponding measures. The EIA Report was disclosed as a requirement of the EIA Regulation and a public participation meeting was organized, however with a low level of participation of citizens and other stakeholders.

3.2. EBRD Requirements

Performance Requirement (PR) 10 of EBRD recognizes the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and, where appropriate, other stakeholders as an essential element of good international practice (GIP) and corporate citizenship. Such engagement is also a way of improving the environmental and social sustainability of projects. In particular, effective community engagement, appropriate to the nature and scale of the project, promotes sound and sustainable environmental and social performance, and can lead to improved financial, social and environmental outcomes, together with enhanced community benefits. Stakeholder engagement is central to building strong, constructive and responsive relationships which are essential for the successful management of a project's environmental and social impacts and issues.

This PR identifies GIP relating to ongoing stakeholder engagement as an ongoing process which involves public disclosure of appropriate information; meaningful consultation with stakeholders; and an effective procedure or mechanism by which people can make comments or raise grievances.

This PR applies to all projects that are likely to have adverse environmental and social impacts and issues on the environment, workers or the local communities directly affected by the project. The clients are expected to identify and engage with stakeholders as an integral part of their overall environmental and social management system (ESMS) and (ESMP) as outlined in PR 1.

4. Previous Stakeholder Engagement

A “Public Participation Meeting” was organized on September 3rd, 2013 in the premise of Mezitli Municipality, within the scope of EIA process. MESKİ presented the Project and potential environmental and social impacts and mitigations to the participants. Major issues discussed with participants included collection and discharge systems and land-use permits related with the project. Despite that the meeting was approved by MoEU; the level of community participation was too low to account for an efficient stakeholder engagement and information disclosure process. Among the 11 participants, 6 people were representatives of State Hydraulic Works, and others represented Mezitli Municipality, Chamber of Environmental Engineers, Mersin Branch of All Headmen’s Association and Mersin Chamber of Commerce and Industry.

Future stakeholder engagement according to the EBRD requirements is described in the following parts.

5. Stakeholder Identification

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. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. Stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

Stakeholders that may potentially be impacted due to the Mezitli WWTP are considered to include primarily the following:

Neighboring Residents

The nearest settlements were initially Esenbağlar Quarter, Eskiköy Quarter and Akdeniz Quarter at the time of the EIA process. The site selection was justified for its isolation from settlements. However, new residential buildings emerged at nearly 14 m distance during the course of project revision of the WWTP. It is highly possible that the new residents were not informed about the Project and its potential impacts. Hence, it is of primary concern to disclose project impacts, mitigation measures and the grievance mechanism to the new population that is at immediate vicinity of the WWTP.

These neighborhoods will be affected most from the Project’s potential impacts during the construction phase. Among the potential impacts, dust, noise, traffic and visual impacts could be listed.

Land Owners and Property Owners

Construction and implementation of the WWTP is also directly impacting the finances of homeowners. Neighborhoods closest to the facility property prices will possibly fall in property values.

Real Estate Companies

WWTP poses a potential challenge for marketing of new residential buildings. Real estate companies are significant for their role in guiding potential residents in their purchase or rental of new apartments which are at very close vicinity to the WWTP. Their role is significant in dissemination of the use of the project grievance system and to cooperate with MESKİ to find ways and means that compensate the falling property prices.

Mezitli Municipality and the City Council

Mezitli Municipality is responsible for providing its residents a series of social services. Mezitli Municipality is particularly working efficiently with the support of its participatory platform: the City Council. Regular meetings are organized by the City Council in order to discuss and solve problems of women, elderly, youth, and people with disabilities, etc. The City Council provides an efficient ground for participatory events that bring local stakeholders together.

Other stakeholder groups include:

- Governorship of Mersin and affiliated provincial directorates (i.e. Directorate of Environment and Urbanization; Directorate of Health; Directorate of Planning, etc.)
- NGOs that advocate rights and claims of communities;
- Research organizations, universities, consultants;
- Local Media (Local Newsletters, local TV channels, etc.)
- Professional Organizations (Chamber of Environmental Engineers, Chamber of Architects, etc.)

Role of environmental NGOs and advocacy NGOs is important as they have the power to organize their members and support them speak for their rights.

Research organizations, universities and consultants can be called in for advice where current level of measures may remain insufficient in responding odor impacts and possible health impacts associated with the Project.

The local media is particularly important for providing correct information that communities can rely on.

Professional organizations are particularly important in organizing participatory events toward solutions of significant problems. Hence they are to be kept informed and involved in need of mediatory interventions.

An elaboration of the relationships between stakeholders gives clues as to designate methods of engagement such as disclosure of information, coordination, cooperation, financial support, technical support.

6. Stakeholder Engagement Plan

Project related information will be disclosed on a dedicated page of MESKI from 24.11.2017. The local EIA Report, Non-technical Summary, this Stakeholder Engagement Plan, Environmental and Social Action Plan and related technical supplementary information will be available in English and Turkish and accessed through the following webpages:

In English: <http://meski.gov.tr/Tesislerimiz/10/mezitli-wastewater-treatment.html>

In Turkish: <http://meski.gov.tr/Tesislerimiz/9/mezitli-atiksu-aritma-tesisi.html>

Information will also be publicized to affected communities through contextually appropriate avenues including distribution of leaflets and on the mass-media (newsletters, TV channels)

Further information on the Project, as well as copies of environmental and social impact assessment studies can be found by contacting MESKI. Full ESIA documentation is available locally at Mezitli Municipality (in hard copy), at MESKI and field office.

MESKI will hold a public consultation meeting with key stakeholders in the region after disclosure of the documents for the wastewater treatment plant project. The meeting will be held in Mezitli in 2018. The details on the meeting will be shared with the stakeholders in due course.

MESKI plans to undertake the following disclosure and stakeholder engagement activities:

- Brief information about the Project published in local newspapers;
- ESAP and ESMP published on the official website of MESKI in both Turkish and in English;
- ESAP and ESMP displayed at the entrance of the Site Office in Turkish; and in local newsletters;
- Meeting held with local stakeholders to disclose the ESIA findings;
- Project-based grievance mechanism established and encouraged for the use of public;
- Coordination of grievance mechanism with the hotline "Alo 185" or corporate grievance procedure;
- Project-specific grievance mechanism made accessible at all times for review of grievance received, recorded, resolved and tracked as related with the Project. Monthly monitoring report on grievances and resolutions, submitted to the Lenders (i.e. EBRD).

- Establishment of a participatory monitoring mechanism
- Quarterly or bi-annual meeting with the Participatory Monitoring Committee
- Sharing of the information on ES issues/monitoring results with the community members, representatives to avoid future complaints from the residents in future.

MESKİ will perform various methods of stakeholder engagement throughout construction and operation stages, as stated in table below:

Table 6-1 Stakeholder Engagement Plan

Stakeholder	Engagement Method
Neighboring Residents	Information disclosed to residents through quarterly or bi-annual community meetings, broadcasting on TV and local newspapers, etc. Including community members in decision-making for the landscaping works. Grievance mechanism
Land and Property Owners	Meetings with land owners and property owners Monitoring odour and disclosure of monitoring reports on regular basis
Real Estate Companies	Continuous disclosure of project information Cooperate for the use of the grievance mechanism Involve in quarterly or bi-annual participatory project meetings
Mezitli Municipality	Regular meetings for evaluating grievances Monthly monitoring reports on grievances and resolutions Informing the City Council on project details, potential impacts, mitigation and monitoring plan, grievance mechanism
NGOs	Continuous disclosure of project information (project description, possible impacts, mitigation measures, monitoring plan, grievance mechanism)
Administrative Authorities	Official correspondence and meetings, project progress updates and reports inclusive of grievances, monitoring of health indicators (diseases, pests, etc.)
Local media	Continuous disclosure of project information on potential impacts and mitigation measures, monitoring results
Professional Organizations	Continuous disclosure of project information (project description, possible impacts, mitigation measures, monitoring plan, grievance mechanism) Quarterly or bi-annual meeting for keeping informed on monitoring results, grievances, results of stakeholder engagement events

Hard and electronic copies of the disclosure material will be available for public review at the following address:

General Directorate of Mersin Water and Sewerage Administration

MESKİ Technical Services Departments Building:

Address: Mahmudiye Mh. Zeytinlibahçe Cd. No: 99 Akdeniz – Mersin

Phone: +90-324 337 08 41 - 45

Fax: +90-324 336 02 77

7. Grievance Mechanism

MESKİ has constructed engagement and grievance systems which are effectively used by local people. The “Grievance Management Procedure” that is accessible from MESKİ’s website where responsibilities, responsible authorities, assessment, monitoring and reporting processes are explained in detail. Sample form is provided in Annex-1. Grievances are responded in 5 days preferably and 10 working days at the latest. The complainant is informed on the decision of the grievance in 3 working days after the decision is given by the responsible authority. Information tools that are used are mail, electronic mail, SMS, telephone and face-to-face interviews. There is also a hotline “185” which is accessible 24/7 for any emergencies and grievances.

MESKI will disclose its grievance procedure through the Media, Publications and Public Relations Department to the Site Manager. In this respect; MESKI and the project staff are responsible for receiving grievances. It is required that a written record of grievance is kept and verbally communicated with Media, Publications and Public Relations Department of MESKI at contact details:

General Directorate of Mersin Water and Sewerage Administration

Media, Publications and Public Relations Department

Phone: +90 324 337 08 41 - 45

Fax: +90 324 336 02 77

Address: Mahmudiye Mh. Zeytinlibahçe Cd. No:99 Akdeniz – Mersin

web page: www.meski.gov.tr


e-mail: halklailiskiler@meski.gov.tr

8. Resources and Responsibilities

The implementation of this SEP will be conducted and monitored by MESKI Sewerage Department. MESKI will assume an overall responsibility for undertaking and supervising engagement with all stakeholders in relation to the Project and will use available resources to ensure that the relevant activities (such as disclosure of Project information, public consultation activities and the management of the Project specific grievances are conducted effectively and to the appropriate standard.

The construction contractors will be monitored closely in order to comply with the requirements of this SEP. They will report to MESKI on regular basis with regards to engagement activities and grievances submitted to them directly.

Appendix A MESKİ Grievance Form

	FORMLAR				
	Doküman Adı: Şikayet Başvuru Formu				
	Doküman Kodu: KYS.FR.KYM.24	İlk Yayın Tarihi: 11.07.2016	Revizyon No:0	Revizyon Tarihi: 11.07.2016	Sayfa 1 / 1

İLETİŞİM BİLGİLERİ

Kurumu	
Birimi	
Adı	
Soyadı	
E-mail	
Telefon	
Cep Tel.	
Dahili Numara	

BİLDİRİM DETAY

İşlem Tarihi	
Hizmet Kategorisi	
Hizmet	
Hizmet Detay	
Öncelik Seviyesi	
Bildirim Türü	
Konu	
Açıklama	

Bu dokümanın güncelliği, elektronik ortamda MESKİ Doküman Yönetim Sisteminden takip edilmelidir.

