TÜRKIYE

MERSIN WASTEWATER II PROJECT FEASIBILITY STUDY

EBRD Contract No.54894

Stakeholder Engagement Plan

October 2024

SWECO in cooperation with Alter and BDO

ACRONYMS AND ABBREVIATIONS

EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
IFC	International Finance Corporation (member of the World Bank Group)
MESKI	Mersin Water and Sewerage Administration
PIP	Priority Investment Programme
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan

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1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the proposed Mersin Wastewater II Project, which is to be implemented in Mersin Province in Türkiye (referred to as the 'Project' in the following). The Project is planned by Mersin Water and Sewerage Administration (MESKI). The Project is expected to receive loan financing from the European Bank for Reconstruction and Development (EBRD) and the International Finance Corporation (IFC).

The objectives of the SEP[1] are to:

- Outline a systematic approach to stakeholder engagement that will help MESKI build and maintain a constructive relationship with their stakeholders.
- Provide means for effective and inclusive engagement with Project stakeholders throughout the Project cycle.
- Ensure that appropriate environmental and social information is disclosed, and meaningful consultation is held with the Project's stakeholders and, where appropriate, feedback provided through the consultation is taken into consideration.
- Ensure that grievances from stakeholders are responded to and managed appropriately.

The SEP covers the following phases of the Project:

- The pre-construction and construction phase of the Project, with construction expected to take place in 2026-2028. Construction of some of the Project components may be completed in 2027.
- The operation phase of the Project after completion of construction in 2027-2028.

The SEP will be publicly available in Turkish and English languages at the MESKI website and as printed copies at the MESKI head office and at its district offices in the project areas. Contact information, including addresses, are included in chapter 11 below.

The SEP will be subject to regular updates as the Project progresses in its implementation.

2 DESCRIPTION AND CONTEXT OF PROPOSED PROJECT

MESKI plans to build up additional wastewater treatment capacity in Mersin Province, which has experienced an unprecedented population growth during recent years. According to official population data from the Turkish Statistical Institute (TURKSTAT), the population increased with on average 1.3% per year during the year 2014-2023. In addition, MESKI estimates, based on the increase in the total water consumption, that approximately 880,000 persons not included in the official population data live in Mersin. They include Syrian refugees, survivors of earthquakes in Türkiye in 2023, as well as Ukrainian and Russian immigrants. In addition, around 966,300 tourists visited Mersin in 2023. This figure does not include the number of visitors who stay in the many summerhouses within the province.

A Feasibility Study was carried out in March-June 2024 and resulted in a Priority Investment Programme (PIP). A proposed Long-Term Investment Strategy has also been developed.

This Stakeholder Engagement Plan relates to the construction activities in connection with the proposed EBRD- and IFC-supported PIP, which will be implemented from 2026-2028, and the subsequent operations. The PIP is summarized in the table below and with further details on each investment in Annex 1.

[1] The objectives are from EBRD's Environmental and Social Policy, Performance Requirement 10: https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html

Investment	Brief description	Location (district)
Extension of the Silifke WWTP	Extension of existing WWTP from current 15,836 m3/day (57,000 PE) capacity to 39,176 m3/day (141,100 PE) capacity.	Silifke District
Extension of the Tarsus WWTP	Extension of existing WWTP from current 54,787m^3/day (378,943 PE) capacity to 66,176 m3/day (457,717 PE) capacity.	Tarsus District
Extension of the Karaduvar WWTP	Extension of existing WWTP from current 200,000 m3/day (1,000,000 PE) capacity to approx. 254,000 m3/day (1,270,000 PE) capacity. EBRD investment is expected to lead to an increase in WWTP capacity of approx. 270,000 PE (54,000 m3/day).	Akdeniz District
Construction of the new Yenice WWTP	Green field project. Construction of a new WWTP. The future WWTP capacity is expected to be: 1728 m3/day (10,000 PE).	Tarsus District
Construction of the new Yesilovacik WWTP	Greenfield project. Construction of a new WWTP. The future WWTP capacity is expected to be: 2,265 m^3/day (9,000 PE).	Silifke District
Extension of the Atakent-Atayurt-Arkum WWTP	New brownfield project, extension of existing WWTP from current 6,310 m3/day (38,600 PE) to approx. 21,287 m3/day. (130,200 PE) capacity. Please note, the existing WWTP will be abandoned and a new WWTP will be located adjacent to the existing WWTP.	Silifke District
Construction of Atakent-Atayurt-Arkum Deep-Sea Discharge for treated wastewater	Construction of a deep-sea pipeline for discharging effluents from the Atakent-Atayurt-Arkum WWTP (see separate project above) to sea. Length of pipeline: On land: 652 meters. On seabed: 1462 meters. Pipe dimension: 630 mm. The depth of the DSD outlet will be 40m below sea level.	Silifke District
Construction of Cesmeli and Kargipinari Deep-Sea Discharge for treated wastewater	Construction of a deep-sea pipeline for discharging effluents. Length of pipeline: On land: 559 meters. On seabed: 1630 meters. Pipe dimension: 500 mm.	Erdemli District
Construction of Kizkalesi Deep-Sea Discharge for treated wastewater	Construction of a deep-sea pipeline for discharging effluents to sea. Length of pipeline: On land: 966 meters. On seabed: 675 meters. Pipe dimension: 315 mm.	Erdemli and Silifke Districts
Construction of Bozyasi Deep-Sea Discharge for treated wastewater	Construction of a deep-sea pipeline for discharging effluents. Length of pipeline: On land: 565 meters. On seabed: 1987 meters. Pipe dimension: 315 mm.	Bozyasi District

The map below shows the 13 districts of Mersin Province and the location of the project components within these districts.

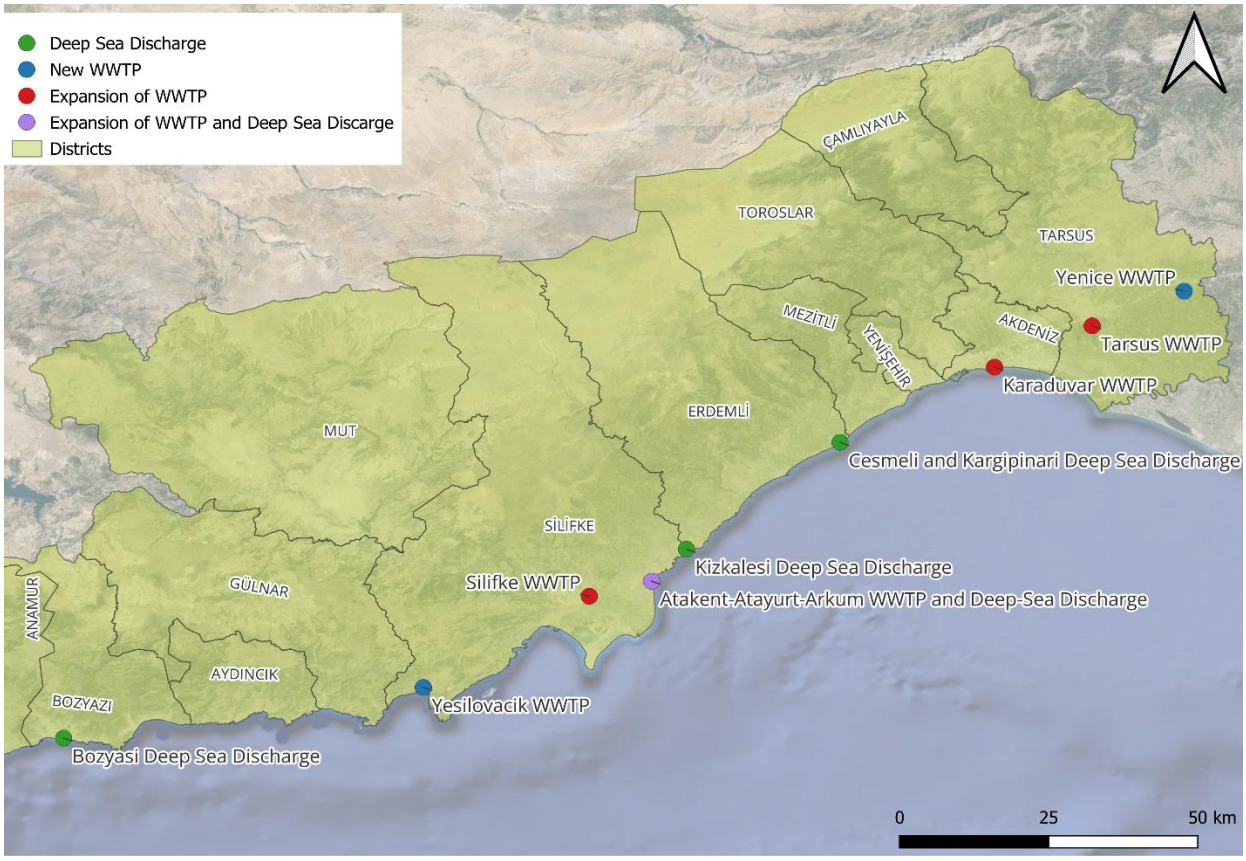


Figure 2-1: The location of project components within the districts of Mersin

The tentative timelines for the Project phases are:

- The construction phase of the Project is expected to take place in 2026-2028. Construction of some of the Project components may be completed in 2027.
- The operation phase of the Project, subsequent to completion of construction, includes a defects notification period of 12 months.

3 RESPONSIBILITY FOR IMPLEMENTATION OF THIS SEP

The PIU under MESKI is responsible for implementing the investments included in the PIP, while other departments in MESKI are responsible for the subsequent operation and management. In line with this, the PIU is responsible for the implementation of stakeholder engagement and communication activities during the construction phase, while MESKI's Customer Affairs and Public Relations departments are responsible for these activities during the subsequent operations.

4 REGULATORY REQUIREMENTS

The Constitution of Republic of Türkiye is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities. In addition, citizens and foreigners resident in Türkiye have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public.

Procedures for consultations with the public, disclosure of information and grievances relevant for this Project are covered under the existing Turkish legislation, particularly the law on Access to Information (Law No. 4982, Official Gazette dated 24.10.2003 and numbered 25269). The purpose of this law is to regulate the principles and procedures for people to exercise their right to information in accordance with the principles of equality, impartiality and openness, which are requirements of democratic and transparent management. The law is applied in relation to activities of public institutions, including organisations that are considered public institutions, such as MESKI. The law regulates the procedures for responding to requests and grievances.

Law No. 3071 on the Exercise of the Right to Petition, dated 01/11/1984, is also of relevance for requests, complaints and notices to public institutions.

Institutions and organisations are to provide access to the requested information or document within 15 working days. This period may be extended to 30 working days for inquiries subject to the right of petition (request, complaint, notice). In this case, the extension and the justification for this are to be notified to the applicant/complainant in writing before the end of the 15-day period. If the complaint or request is rejected, the applicant/complainant is to be informed about the justification for this decision and the ways in which potential objections may be submitted.

Türkiye has not ratified the Convention on the Right to Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), from 1998. However, it is mandatory in Türkiye to hold public participation meeting for all so-called Annex-1 projects as described in the national Environmental Impact Assessment (EIA) regulation from 2022. The regulation requires the meeting to be conducted in the project site, be accessible for interested people; and the date and venue of the meeting need to be approved previously by the Governor and announced in a local and a national newspaper, at least 10 days prior to the meeting. Similar announcements will also be posted to the neighbouring quarters, institutions / organizations granted competence by the Ministry of Environment Urbanization and Climate Change (MEUCC). Annex-1 projects are subject to an environmental impact assessment process, which includes the preparation of a stakeholder engagement plan.

For the current Project, MESKI is required to put a summary of environmental and social information in the public domain.

5 OTHER REQUIREMENTS

EBRD's Performance Requirement on Information Disclosure and Stakeholder Engagement (PR 10) is to be fulfilled, and the current SEP is formulated in accordance with this. The objectives of this SEP, which are included in chapter 1 above, are thus from EBRD's PR10.

Further details on PR10 are included in EBRD's Environmental and Social Policy, which can be found on: https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html.

The PIU will maintain records of stakeholder engagement and communication activities before and during the construction phase, while MESKI's Customer Affairs and Public Relations departments will do this during operations. These records will include lists of main stakeholder groups, key incoming communication (i.e. general questions, complaints, etc.) and the response to these. A stakeholder engagement log will also be updated with activities undertaken before and during the construction phase of the Project and during the subsequent operation phase, see also Appendix 2 below.

Stakeholder engagement activities conducted by contractors and grievances received by the contractors will also be recorded and reported to the PIU on a daily basis and will be included into their records.

6 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In accordance with the national EIA regulation from 2022, stakeholder meetings were held in 2023 in relation to the planned extension of the existing WWTPs in Silifke, Tarsus, and Karaduvar. The views and suggestions from these meetings are summarised in section 6.1 below, while an overview of MESKI's general stakeholder engagement activities and grievance mechanism is presented in section 6.2 and 6.3.

The Project-specific stakeholder engagement activities included in this SEP build on previous activities as summarised in this chapter.

6.1 Previous Project-specific stakeholder engagement activities

6.1.1 Stakeholder meeting in Silifke

A stakeholder meeting for the Silifke WWTP project was held on 19 October 2023, as part of the national EIA process. Two weeks before the meeting, the time, place, and agenda of the meeting were published on the websites of MESKI and the Provincial Directorate of Environment, Urbanization and Climate Change, in regional and national newspapers and announced on local loudspeakers.

Four community members attended the meeting, in addition to representatives from MESKI, the Provincial Directorate of Environment, Urbanization and Climate Change, and the company conducting the EIA.

Presentations were made during the meeting of the planned expansion of the Silifke WWTP. According to the minutes from the meeting, the four community members participating in the meeting did not have any opinions or suggestions in the relation to the project.

6.1.2 Stakeholder meeting in Tarsus

A stakeholder meeting for the Tarsus WWTP project was held on 26 September 2023, as part of the national EIA process. Two weeks before the meeting, the time, place, and agenda of the meeting were published on the websites of MESKI and the Provincial Directorate of Environment, Urbanization and Climate Change, in regional and national newspapers and announced on local loudspeakers.

10 community members attended the meeting, in addition to representatives from MESKI, the Provincial Directorate of Environment, Urbanization and Climate Change, and the company conducting the EIA.

Presentations were made during the meeting of the planned expansion of the Tarsus WWTP. According to the minutes from the meeting, the possible positive and negative social and environmental impacts of the project on the neighbourhood were explained in response to questions from community members participating in the meeting. The neighbourhood headman (mukhtar) stated that there were negative opinions about the project because of concerns that it would cause odour.

6.1.3 Stakeholder meeting in Karaduvar

A stakeholder meeting for the Karaduvar WWTP project was held on 29 November 2023, as part of the national EIA process. Two weeks before the meeting, the time, place, and agenda of the meeting were

published on the websites of MESKI and the Provincial Directorate of Environment, Urbanization and Climate Change, in regional and national newspapers and announced on local loudspeakers.

Eight community members attended the meeting, in addition to representatives from MESKI, the Provincial Directorate of Environment, Urbanization and Climate Change, and the company conducting the EIA.

Presentations were made during the meeting of the planned expansion of the Karaduvar WWTP. According to the minutes from the meeting, community members participating in the meeting expressed the following concerns about the Karaduvar WWTP project:

- Many tourists visit the area and the Deliçay stream should therefore be rehabilitated.
- Wastewater is discharged directly into the sea during periods of heavy rain, which seems problematic.
- There is an odour from the WWTP due to the spread of sewage sludge on the WWTP site, and the sludge dewatering tanks must be covered.
- There is a problem with flies. MESKI should therefore frequently spray for flies, and the area around the WWTP should be afforested.

The above comments have been considered in the environmental and social assessment conducted as part of the Project, and relevant mitigation measures were identified. More detailed information can be found in the Non-technical Summary document. It is noted that there seems to be no relation between the stream and the Karaduvar WWTP, which currently uses a deep-sea discharge pipeline for its treated wastewater and will continue to do so in the future.

6.2 MESKI's general communication activities

MESKI's Press and Public Relations Department is responsible for MESKI's communication activities.

The following are the main topics on which MESKI provides information:

- Interruptions of the water and wastewater services and scheduled repairs.
- Tariff increases.
- Status of activities and plans of MESKI, including planned investments.
- Water quality.
- Awareness campaigns on various topics.
- Special events.

MESKI disseminates information through various channels:

- Primarily through MESKI's web page, https://www.meski.gov.tr/pages/Iletisim.xhtml.
- Mass media (television, radio, and newspapers): This is mainly on its ongoing rehabilitation works, its project plans and events.
- Different social media: Facebook, X, and Instagram. Social media is used to both receive opinions and complaints from the public and to announce news regarding MESKI's activities.
- Public meetings, which MESKI arranges in connection with new projects, including in connection with the start of construction activities. Public meetings as part of the EIA process are arranged by the EIA consultants.
- Visits by MESKI staff to different parts of its service area. This involves, among others, a social expert who visits and holds meetings in different neighbourhoods 3 days a week, compiles complaints and demands, prepares reports, and forwards these to the relevant departments.
- MESKI's ordinary general assembly meetings and tender sessions are broadcast live on social media. Thus, the people of Mersin can be instantly informed about the decisions taken (assignments,

tariffs, new investments, budget, etc.). People can express their opinions interactively during the broadcast.

Customers can use MESKI's subscriber management system application to do all procedures related to subscription, information update, debt inquiry and payment, read & pay, invoices and receipt viewing, invoice objection, notification of service disruptions, leakages etc., automatic payment order inquiry, appointment transactions etc.

6.3 MESKI's general grievance mechanism

Customers can use MESKI's subscriber management system application to submit grievances.

Other channels for customers and other stakeholders to raise their grievances include:

- Through the Desk at Mersin Metropolitan Municipality
- Through the Complaints Resolution Desk at MESKI
- The MESKI website: https://www.meski.gov.tr/pages/Iletisim.xhtml, using the Request & Suggestion button.
- Through the Presidential Communication Centre.
- Governorate open door Project: https://www.acikkapi.gov.tr/Basvuru/BasvuruGiris.
- Social Media: https://www.facebook.com/meski.gov.tr/?locale=tr_TR, https://www.instagram.com/meskigm/, https://x.com/MeskiGM
- 185 hotline, which is operated 24/7 by MESKI staff. Since the phone numbers of the headmen (Mukhtars) are defined as "priority" in the system, the headmen who call 185 can communicate without waiting.
- The 153 hotline in Mersin Metropolitan Municipality. If the call is related to MESKI's area of responsibility, then the issue is sent directly to MESKI Public Relations Department.
- Written complaints, which are sent to the General Document Office and from there to the relevant department.
- Blue boxes at MESKI building (used by both customers and MESKI personnel).

All grievances, requests, and inquiries are registered in MESKI's subscriber system. MESKI attempts to solve all complaints within the same day or within a few days.

7 IDENTIFICATION OF STAKEHOLDERS AND COMMUNICATION METHODS

The table below lists the key stakeholders identified during the Feasibility Study and their interests regarding the Project. As mentioned in chapter 1, the SEP will be subject to regular updates, as needed. This will include the addition of new stakeholders identified later.

Table 7.1: Key Stakeholders and their Interests

Key Stakeholders	Specific Interests in / Relevance for Project
National Governmental Organisations	
• General Directorate of Infrastructure investments • Ministry of Environment Urbanization and Climate Change • Ministry of Culture and – Tourism • 5th Regional Directorate of Highways	• National and regional development • Policy formulation and Planning • Permitting • Updating and sharing the legislations
Mersin Metropolitan Municipality	
• Mayor • The Municipal Council, Press and Public Relations Department • City Council • Various Departments	• The benefits of the Project for residents in Mersin Province. • Dissemination of information on the Project. • Cooperation on regulation of traffic during construction phase. • Compliance with legislation, e.g., on approvals.
Local Governmental Organisations	
• Governorship of Mersin • Provincial Directorate of Environment Urbanization and Climate Change • Provincial Directorate of Culture and Tourism • Adana Cultural Heritage Preservation Regional Board Directorate • Mersin Provincial Directorate of Agriculture and Forestry • Toroslar Electricity Distribution Company (EDAŞ) • Silifke Municipality • Tarsus Municipality • Akdeniz Municipality • Erdemli Municipality • Bozyazı Municipality	• Social and economic development • Environmental protection • Management of environmental impacts (e.g. wastes, wastewater) • Emergency planning and intervention • Environmental and social impact • Cooperation on regulation of traffic during construction phase. • Compliance with legislation, e.g., on approvals. • Permitting • Auditing and reporting
Non-Governmental Organisations	
• Mersin Union of Chambers of Turkish Engineers and Architects (TMMOB) • Mersin Chamber of Environmental Engineers • Mersin Chamber of Civil Engineers • Mersin Bar Association (including Environmental Commission)	• Environmental and social impacts • Cumulative impacts • Economic development • Inclusivity and accessibility • Security impacts
Mukhtars/Local Communities/Residents	
Residents (women and men), businesses and organisations in the Project areas	• Improved wastewater services, including reduced odour from some WWTPs. • Employment opportunities. • Concerns that they may be negatively affected during the construction phase (traffic, noise, community health and safety, livelihood effects, gender-based violence and harassment).
Neighbourhood headmen (mukhtars)	• Improved wastewater services, including reduced odour from some WWTPs. • Potential negative impacts for residents during the construction phase. • Important role in dissemination of information about the Project.
MESKI employees	• The influence of the Project on their work. • The benefits of the Project for MESKI and its customers. • Opportunities for professional development. • Dissemination of information on the Project.
Media (local and national)	

Key Stakeholders	Specific Interests in / Relevance for Project
Yeşil Gündem Newspaper Güney Newspaper Mersin Haberci Newspaper Mersin İmece Newspper Çukurova Newspaper Güney TV Mersin TV Kanal 2000 Kanal 33 İçel FM Mersin Radyo Mersin FM Tarsus Yaren FM Social media, X, linked-in, facebook, Instagram of Municipality and MESKI	• Providing regular information about the Project. • Bringing Project announcements at the request of MESKI and its PIU.

The main stakeholders as target groups for information disclosure activities are indicated in chapter 8 below.

The communication methods to be used for this Project will be based on those currently used by MESKI, possibly supplemented by other methods. The main communication methods will thus be:

- MESKI's web page, https://www.meski.gov.tr/pages/Iletisim.xhtml.
- Different social media, such as Facebook, X, and Instagram.
- Through neighbourhood headmen (mukhtars).
- Through MESKI staff, including social experts/community liaison officers.
- Television, radio and/or newspapers.
- Brochures and posters.
- Public consultation meetings.

Other communication channels may be identified. Particular efforts will be made to ensure that both women and men from different population groups, including from vulnerable groups, receive information about the project, the benefits of it, the grievance mechanism, and how they may potentially be negatively affected during the construction phase.

A large vulnerable group of Syrian refugees have been identified close to the Tarsus WWTP extension project. They live in an informal tent camp mainly used by Syrian refugees. MESKI is to establish good communication with the inhabitants of this tent camp before and during the construction phase, with a focus on traffic and other health and safety aspects. Information should also be provided generally on the Project and the construction activities, including the duration of these. Information is to be provided in the most appropriate language, which is likely to be Arabic. Illustrations/pictures should be widely used in written information materials.

There is also tent camp approx. 500m west of the new Yenice WWTP site. No significant adverse impact is expected for the inhabitants of this camp, but they should be informed about the project and the construction activities, including the duration of these. Information should be provided in the most appropriate language. It should be considered to use illustrations/pictures in written information materials.

The PIU will work closely with local leaders to identify other vulnerable groups in each of the project areas to ensure that Project information reach these groups.

MESKI is to inform inhabitants of the tent camp approx. 500m from the new Yenice WWTP site about the Project and the construction activities, including the duration of these. Information should be provided in the most appropriate language. It should be considered to use illustrations/pictures in written information materials.

The following chapters on disclosure of information, the stakeholder engagement programme, and the public grievance mechanism contain more specific details on the communication methods that will be used.

8 DISCLOSURE OF INFORMATION DURING PRE-CONSTRUCTION AND CONSTRUCTION PHASE

Before the construction works starts, the PIU and MESKI's Customer Affairs and Public Relations departments will provide information to the stakeholders mentioned above. The main contents of this information is outlined in the table below.

Information will be disseminated in all areas of Mersin Province, with particular focus on the areas that will be most affected by construction activities (see also the Project description in chapter 2 above).

The initial information will be distributed through press releases and brochures (the latter mainly in the areas that will be most affected by construction activities) with contents similar to those outlined in the table below. Information on the Project, the time schedule, and opportunities for public comments, and the grievance mechanism will also be posted in local newspapers in Turkish. In addition, information will be available upon request.

The Stakeholder Engagement Plan and the Non-Technical Summary of the Environmental and Social Assessment Report will be made publicly available at the website of MESKI in Turkish and English and also made available in hard copy at the premises of MESKI and the district municipality offices.

The following table includes an outline of the contents of the information to be provided about the Project during the pre-construction and construction phase. As mentioned at the end of the table, local and site-specific information will be distributed through MESKI's district offices and neighbourhood headmen (mukhtars). The district offices and neighbourhood headmen can contact the PIU for local and site-specific information.

Table 8.1: Outline Contents of Project Information during the Pre-construction and Construction phase

Headings	Outline content
Main organisations	MESKI is responsible for Project construction activities and for the subsequent operations. MESKI will engage Contractors to do the actual construction work. MESKI's responsibilities include stakeholder engagement and communication activities before and during construction and during subsequent operations.
Main project components	The PIP includes the following improvements: • Extension of the Silifke WWTP, Silifke District • Extension of the Tarsus WWTP, Tarsus District • Extension of the Karaduvar WWTP, Akdeniz District • Construction of the new Yenice WWTP, Tarsus District • Construction of the new Yesilovacik WWTP, Silifke District • Extension of the Atakent-Atayurt-Arkum WWTP, Silifke District

Headings	Outline content
	• Construction of Atakent-Atayurt-Arkum Deep-Sea Discharge for treated wastewater, Silifke District • Construction of Cesmeli and Kargipinari Deep-Sea Discharge for treated wastewater, Erdemli District • Construction of Kizkalesi Deep-Sea Discharge for treated wastewater, Erdemli and Silifke Districts • Construction of Bozyasi Deep-Sea Discharge for treated wastewater, Bozyasi District
Time frames	Tentative timelines for Project phases: • Construction is expected to take place in the period 2026-2028. Construction of some of the Project components may be completed in 2027. • The Project operation phase, which starts after completion of construction in 2027-2028, includes a defects notification period of 12 months. Information will be provided about the specific construction period in the individual project area, when this has been decided.
Areas to benefit / be affected	The districts of Silifke, Tarsus, Akdeniz, Erdemli, and Bozyasi in Mersin Province.
Opportunities and benefits, mainly when construction is complete	The main benefits are: • Continued high-quality treatment of wastewater and sludge in the light of increased future population and wastewater loads. • Treatment of higher volumes of wastewater compared to the current situation, reducing the risk of release of untreated wastewater into the recipient water. • Avoiding discharge of effluents to more sensitive surface waters (i.e. local streams or rivers) while obtaining a high level of dilution of the already treated effluents with the objective to ensure bathing water quality along the coast. • Substantial reduction in greenhouse gas emissions compared to an alternative scenario based on collection of wastewater in septic tanks • Some reduction in water and sanitation related diseases. • Employment opportunities during the construction phase.
Impacts during construction as a consequence of Project activities and expected notification of key mitigation actions to be applied	Increased noise levels and air pollution from the operation of large machinery which may affect health and safety of workers and/or be a cause of nuisance for local residents: • Continuous maintenance of machinery and equipment • Provide workers with adequate protection gear (incl. hearing protection) • Consideration of location and distance to the nearest residents as well as prevailing wind directions; adjust arrangements such as to minimize nuisance for residents. Dust from excavated materials which may be of nuisance to both workers and local residents: • Cover lorries transporting spoil materials. • As and when appropriate, sprinkle roads to reduce dust generation. • In dry and windy conditions cover excavations temporarily stored on site. Risk of road / pedestrian accidents due to construction activities and temporary restrictions in access to various facilities: • Contractors to prepare and implement a site-specific Traffic Management Plan, including timely provision of site-specific information to local residents about exact location and time of construction activities as well as temporary traffic arrangements. • Cordon-off any works in public areas to prevent accidents. • Inform local residents about community health and safety risks in connection with trench work, especially when laying the deep sea discharge pipelines. Workers' accidents and/or injuries:

Headings	Outline content
	• Contractors to prepare and implement a site-specific Occupational Health and Safety Management Plan • Training of all workers on the workplace risks and appropriate mitigation measures. Furthermore, description of stakeholder engagement activities and the community grievance mechanism to be publicly available.
Announcement of planned public meetings	Announcement about public meetings should be published in Turkish in advance of the meetings, including place and time of the public meetings, see also section 9.1 below.
General grievance procedure during construction	• Description of the grievance procedure • Organisation to contact (see chapter 11 below)
Local and site-specific information	Local and site-specific information will be distributed through MESKI's district offices and neighbourhood headmen (mukhtars). The district offices and neighbourhood headmen can contact the PIU for local and site-specific information.

The table below shows how information will be disclosed, the institution responsible, the target groups, and the overall timeline.

Table 8.2: Means of Disclosing Information

Institution Responsible	Means of Information Disclosure	Target groups	Timeline
MESKI's PIU	• Brochure with contents as described in the previous table • Stakeholder Engagement Plan • Non-Technical Summary • Announcement in local newspapers, in Turkish with the same overall contents as in the brochure • MESKI's website • Social media	All stakeholders	Prior to construction
MESKI's PIU in cooperation with district offices, and neighbourhood headmen (mukhtars)	• Distribution of brochure in public places in the Project areas, including for example at apartment buildings, shops, and schools • Information through public consultation meetings • Social media messages • Response to local inquiries	Local residents (women and men), businesses and organisations in areas most affected by construction activities	Prior to construction Response to local inquiries will be an ongoing activity during the construction phase
MESKI's PIU, in cooperation with contractors and through relevant provincial/district departments	Notification of streets (e.g. through posters and meetings) in the neighbourhood at the beginning of construction works: • Reminder of traffic changes and parking restrictions in streets where works will commence and the time schedule for the works • For emergencies or grievances, contact telephone number for MESKI's PIU and the relevant district office to be posted close to works sites.	Local residents (women and men), businesses and organisations in areas most affected by construction activities	Prior to construction

Institution Responsible	Means of Information Disclosure	Target groups	Timeline
MESKI's PIU	• Overall contact point for information during implementation of the Project and on request distributor of information on progress of work, as described in approved reports and minutes of meetings. • During construction responsible for structured responses to grievances (see section on grievance procedures).	All stakeholders	Prior to construction Grievance procedure will be an ongoing activity during the construction phase

9 STAKEHOLDER ENGAGEMENT PROGRAMME

9.1 Public Meetings prior to and during Construction

Several public meetings will be held to inform about the Project and the start of construction activities. These will include at least one public meeting in each of the 9 project areas listed in chapter 2 above.

The meetings will be held at locations that are accessible to, and encourage the participation of different stakeholders. As mentioned in chapter 7, particular efforts will be made to ensure that both women and men from different population groups, including from potential vulnerable groups, receive information about the project, the benefits of it, the grievance mechanism, and how they may potentially be negatively affected during the construction phase. Participants will be encouraged to ask questions and provide comments during the meetings. The specific dates and places for the public meetings will be decided when the approximate start of construction activities is known. The conclusions of the public meetings will be agreed during the meetings and recorded.

Priority will be given to holding a public meeting in the Karaduvar WWTP project area as soon as the design for the large WWTP extension is confirmed. The identified impacts and mitigation measures will be presented. Participants will be encouraged to ask questions and provide comments during the meeting and/or through a contact person in the district municipality.

Information about the Project will also be available on request.

The activities, specifications, means of communication and outputs of the stakeholder engagement process are shown in the table below.

Table 9.1: Public meetings and outputs

Required Activities	Specifications	Means of Communication and Outputs
Announcement of the public meetings	• Location, date and time will be announced well in advance of the public meetings.	• Announcement in local newspapers in Turkish. Most relevant newspapers at time of announcement to be identified by the PIU. • Notices at boards at the relevant district administration and neighbourhood headmen (mukhtars).

Required Activities	Specifications	Means of Communication and Outputs
Holding several public meetings at locations to inform about the Project and the start of construction activities. These will include at least one public meeting in each of the 9 project areas listed in chapter 2 above. Encouraging participants to ask questions and provide comments during the meetings.	• Meetings and discussions are arranged. • Leaflets or other hand-outs may be distributed during the meetings.	• Conclusions from public meetings are agreed at the end of the meetings and recorded.
Preparation and distribution of minutes with conclusions from the public meetings.	• The PIU prepares minutes of public meetings	• Minutes of public meetings are available on MESKI's website and also at the offices of the relevant district administration and of the relevant neighbourhood headman (mukhtar).

9.2 Stakeholder Engagement and Communication during the Operations Phase

During the operations phase, MESKI will continue providing information on a large variety of topics related to the operations of their water supply and wastewater services, including among others:

- The operations and benefits of the new wastewater infrastructure constructed as part of the Project.
- Planned interruptions of the water and wastewater services and scheduled repairs.
- Tariff increases.
- Status of activities and plans of MESKI, including planned investments.
- Results of water quality monitoring.
- Grievance mechanism and contact information.

Similar communication methods will be used in the operations phase as during construction, as presented in chapter 7 above.

10 PUBLIC GRIEVANCE MECHANISM

10.1 Public Grievance Mechanism during Construction Phase

MESKI has a well functional grievance mechanism within its Quality Management System. This existing grievance mechanism, which operates is in accordance with the stipulations of the Law No. 3071 on the Exercise of the Right of Petition, Article 74 of the Constitution of Turkey and the Law No. 4982 on the Right to Information, as well as the requirements of EBRD. MESKI's existing grievance mechanism will be used for Project related grievances. MESKI's community liaison officers will ensure that all project-related grievances are registered in MESKI's grievance system in such a way that overviews of project-related grievances can be extracted from the system for monitoring by the PIU.

The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded to within a predetermined timeline and on the basis of their contents, by the PIU's responsible staff and that the corrective/regulatory action to be taken is acceptable to both parties. The complainants should be informed on the outcomes of the corrective activities. Additionally, the mechanism should be designed to allow anonymous grievances to be received and addressed. The existence of a grievance mechanism does not affect a complainant's access at any point to judicial or administrative remedies. Reprisals resulting from reporting a complaint will not be tolerated, and suspicions of retaliation will be thoroughly investigated.

During the construction phase, all communication on grievances from the public will be channelled through the PIU, which will handle all grievances that may arise during the construction works such as potential noise, dust, traffic problems, and gender-based violence and harassment.

Project-related grievances can be submitted through the channels mentioned in section 6.3 above and can also be conveyed through contractor's representatives, MESKI's community liaison officers, and mukhtars. MESKI will ensure that all stakeholders are well aware of the project's grievance mechanism. The grievance mechanism will be disclosed in individual and public meetings and contact information will be provided.

Complainants will be informed about the proposed corrective action within 15 days of submitting their complaint. As per national legislation, if extra time is required, the deadline may be extended to up to in total 30 days.

The PIU will require contractors to provide a grievance mechanism for their workers, enabling them to report any grievances they may have at their workplace. However, the grievance mechanism operated by the PIU will also be open for the contractors' workers to use, e.g., in situations where grievances have not been attended to by the contractors or where the workers might fear retaliations if they were to complain to the contractor as their employer. At the start of the different contractors' work, the PIU will inform the contractors' workers about the grievance mechanism operated by the PIU and provide the name and contact details of the contact person. The PIU will ensure that it is easy for workers to submit their possible grievances through its contact person, who will ensure transparent feedback without any retribution. If the workers wish so, their grievances will remain anonymous. Workers will be encouraged to submit grievances in writing, but they can also be submitted orally to the contact person of the PIU.

The external grievance mechanism is to be applied as described in the figure below. All grievances will be registered, along with the status of the investigation into the problem and its resolution, as appropriate. Keeping the timeframes for response to complainants, as shown in the figure, will be the criteria used to assess whether the grievance mechanism is implemented successfully.

It is important to ensure that data obtained in connection with grievances are managed carefully, observing the following principles:

- Personal data should only be retained as long as necessary; for grievances, this would be until resolution has been agreed and actions implemented. Personal data should then be either deleted, redacted or archived.
- The type of data collected and the way they are stored should consider ethical and privacy concerns, as well as confidentiality and the protection of personal data.
- The channels to receive and record stakeholder views and grievances should consider the management of personal data.

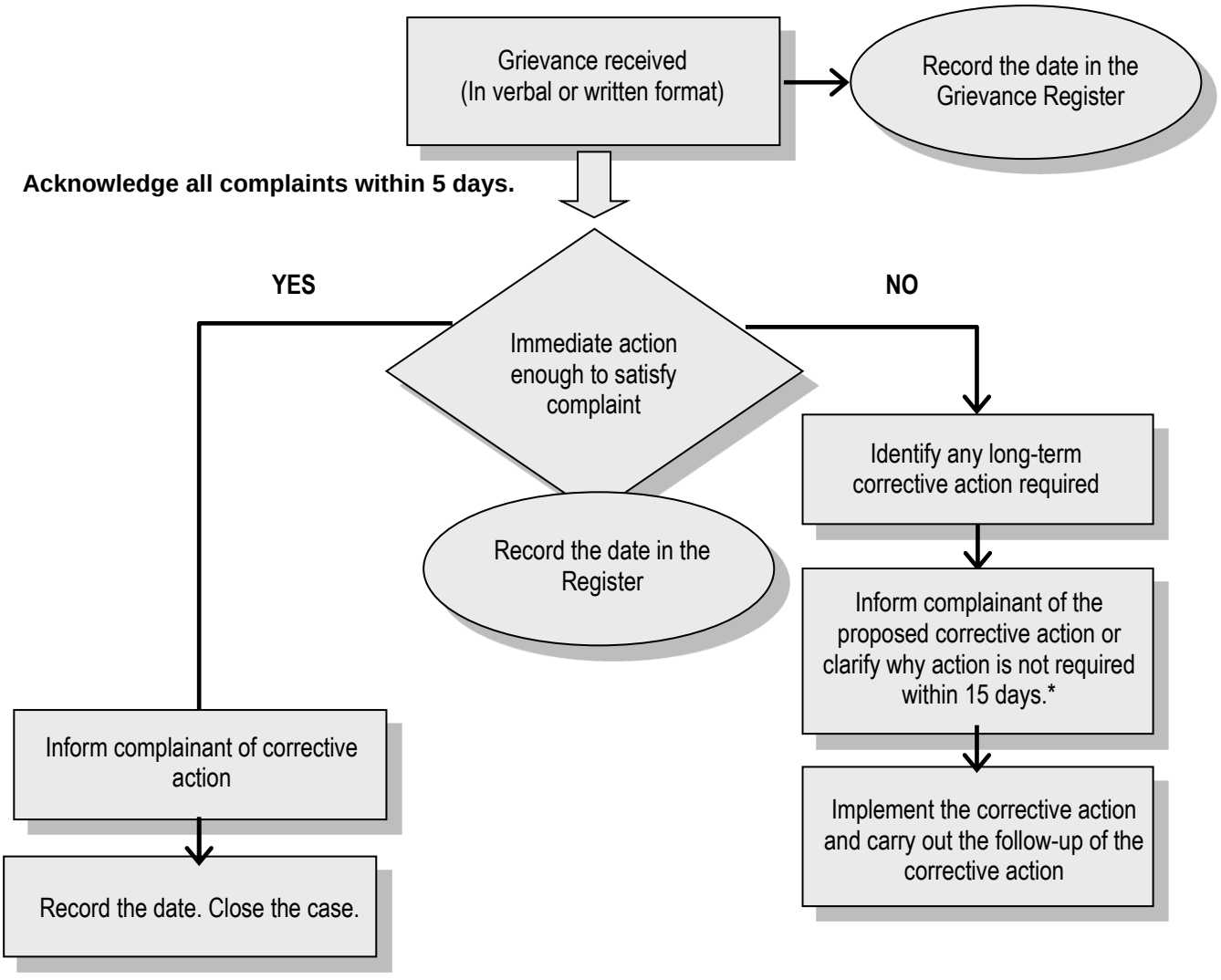
10.2 Public Grievance and Complaint Mechanism during Operation Phase

MESKI will continue using its existing grievance mechanism during the operation phase but may adjust it to include potential lessons learnt from the handling of grievances during the Project construction phase.

10.3 EBRD's Independent Project Accountability Mechanism

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-impacted people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the EBRD has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

Flowchart for Processing Grievances



** Depending on the type of grievance, this deadline might be extended to up to a total of 30 days.*

Figure 10.1: The Grievance Procedure

For each case of grievance, a record sheet shall be filled in either by the complainant in cases where the complainant appears personally at the MESKI office or when receiving a complaint by phone, e-mail, post or through the MESKI website. The PIU will review and may adjust the public grievance form included below before the start of the Project.

Public Grievance Form
It is possible to submit an anonymous grievance. If you wish to submit an anonymous grievance, you should not submit your contact information. Submitting an anonymous grievance means you will receive no response to your grievance.

Reference No:	
Full Name	
Contact Information **Please mark how you wish to be contacted (mail, telephone, e-mail).**	☐ **By Post: Please provide mailing address:** _____ _____ _____ _____ ☐ **By Telephone:** _____ ☐ **By E-mail** _____
Preferred Language for communication	☐ **Turkish** ☐ **Arabic**

Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of Incident/Grievance	
	☐ **One time incident/grievance (date _____)** ☐ **Happened more than once (how many times? _____)** ☐ **On-going (currently experiencing problem)**

What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:
MESKI
General Directorate
Address: Çankaya Silifke Caddesi No: 55 -33070 Akdeniz-Mersin
Email: halklailiskiler@meski.gov.tr

11 CONTACT INFORMATION

MESKI is responsible for stakeholder engagement during the construction phase and the subsequent operations. The following is the contact information:

MESKI
General Directorate
Address: Çankaya Silifke Caddesi No. 55, 33070 Akdeniz-Mersin
Telephone: (0324) 337 08 41-45
Email: halklailiskiler@meski.gov.tr
Website: https://www.meski.gov.tr

APPENDIX 1: DETAILED PROJECT DESCRIPTIONS

Table 0-1: Summary of key PIP infrastructure components for Silifke

Item (PIP)	Activities and footprint	Brief description & rationale
Silifke wastewater infrastructure		
Extension of existing WWTP from current 15,836 m3/day (57,000 PE) capacity to 39,176 m3/day (141,100 PE) capacity.	The extension project takes place within the existing 30 ha WWTP site. Key PIP components are as follows: • Two anaerobic zones (in racetrack format) • Two aeration tanks (Oxidation Ditches in racetrack format). • Three final settling tanks. Note that one of the new final settling tanks will replace the existing two final settling tanks (too small) which will be demolished. • Return Sludge Pump Station • Effluent disinfection and transfer to the river. • Blower building. The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge.	**Need for project** The extension will enable the plant to maintain high effluent standards into the future with increased wastewater capacity.
Dismantling of parts of existing WWTP line	Parts of the existing treatment line will be demolished once a new line has been constructed. Construction strategy: A new treatment line will be constructed first, then demolition of the existing works, and then new construction of a final settling tank at the location of the old line.	

Table 0-2 Summary of key PIP infrastructure components for Tarsus WWTP

Item (PIP)	Activities and footprint	Brief description & rationale
Tarsus wastewater infrastructure		
Extension of existing WWTP from current 54,787m^3/day (378,943 PE) capacity to 66,176 m3/day (457,717 PE) capacity.	The extension project takes place within the existing 17.6 ha WWTP site. Key PIP components are as follows: • Two anaerobic zones for biological phosphorus removal (in racetrack format). • Two aeration basins (Oxidation Ditches in racetrack format). • One additional final settling tank. • Return Sludge Pump Station and Waste Sludge Pump Station. The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge from the WWTP.	**Need for project** The extension will enable the plant to maintain high effluent standards into the future with increased wastewater capacity.
Dismantling of parts of existing WWTP line.	No dismantling activities are expected to take place as part of the PIP.	

Table 0-3 Summary of key PIP infrastructure components for Karaduvar WWTP

Item (PIP)	Activities and footprint	Brief description & rationale
Karaduvar wastewater infrastructure		
Extension of existing WWTP from current 200,000 m3/day (1,000,000 PE) capacity to approx. 254,000 m3/day (1,270,000 PE) capacity. EBRD investment is expected to lead to an increase in WWTP capacity of approx. 270,000 PE (54,000 m3/day).	The extension project takes place within the existing 22.7 ha WWTP site. Key PIP components are as follows: • Aerated grit chambers (additional 50% capacity). • One additional primary sedimentation tank (additional 20% capacity) • Four Oxidation ditches in racetrack configuration with diffused air (additional 50% capacity). • One additional final settling tank (additional 12½% capacity). • One additional anaerobic digester and one additional gas storage balloon. • Two additional gravity sludge thickeners (additional 50% capacity). • Relocation of solar drying facility The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge.	**Need for project** The extension will enable the plant to maintain high effluent standards into the future with increased wastewater capacity. In order to minimise the transport of sludge for incineration at cement kilns, the sludge will be dried on-site.
Dismantling of parts of existing WWTP line	No dismantling activities are expected to take place as part of the PIP.	

Table 0-4: Summary of key PIP infrastructure components for Yenice WWTP

Item (PIP)	Activities and footprint	Brief description & rationale
Yenice wastewater infrastructure		
Green field project. Construction of a new WWTP. The future WWTP capacity is expected to be: 1728 m3/day (10,000 PE).	The construction of the new WWTP will take place on a green field site. Key PIP components are as follows: • Inlet works, including screens and grit removal. • Two integrated Aeration Tanks and Settling Tanks. Aeration system is via fine bubble diffusers. • Sludge thickening and dewatering unit. The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge.	**Need for project** The construction of the new WWTP will enable to treat wastewater to high effluent standards.
Dismantling of parts of existing WWTP line.	Not applicable. Greenfield project.	

Table 0-5 Summary of key PIP infrastructure components for Yesilovacik WWTP

Item (PIP)	Activities and footprint	Brief description & rationale
Yesilovacik wastewater infrastructure		
Greenfield project. Construction of a new WWTP. The future WWTP capacity is expected to be: 2,265 m^3/day (9,000 PE).	The construction of the new WWTP will take place on a greenfield site. Key PIP components are as follows: • Inlet works, including screens and grit removal. • Two integrated Aeration Tanks and Settling Tanks. Aeration system is via fine bubble diffusers. • Sludge thickening and dewatering unit. The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge.	**Need for project** The construction of the new WWTP will enable treatment of wastewater to high effluent standards.
Dismantling of parts of existing WWTP line	Not applicable. Greenfield project.	

Table 0-6 Summary of key PIP infrastructure components for Atakent-Atayurt-Arkum WWTP

Item (PIP)	Activities and footprint	Brief description & rationale
Atakent-Atayurt-Arkum wastewater infrastructure		
New brownfield project, extension of existing WWTP from current 6,310 m3/day (38,600 PE) to approx. 21,287 m3/day. (130,200 PE) capacity. Please note, the existing WWTP will be abandoned and a new WWTP will be located adjacent to the existing WWTP.	The extension project takes place within the existing WWTP site. Key PIP components are as follows: • Inlet screens • Grit chambers • Three Aeration Tanks (in racetrack configuration). • Three Final Settling Tanks • Gravity sludge thickeners. • Beltfilter Press for sludge dewatering. • Blower station. The WWTP is designed for nitrogen and phosphorus removal. Effluents will meet sensitive water standards at point of discharge.	**Need for project** The extension will enable the plant to maintain high effluent standards into the future with increased wastewater capacity.
Dismantling of parts of existing WWTP line	The existing works are to be demolished. In order to avoid immediate demolition of the existing WWTP (and hence maintain treatment), it is recommended to commence construction of the new Oxidation Ditches adjacent to the existing plant boundary.	

Table 0-7 Summary of key PIP infrastructure components for Atakent-Atayurt-Arkum DSD

Item (PIP)	Activities and footprint	Brief description & rationale
Atakent-Atayurt-Arkum DSD infrastructure		
Construction of a deep-sea pipeline for discharging effluents from the Atakent-Atayurt-Arkum WWTP (see separate project above) to sea. Length of pipeline: On land: 652 meters. On seabed: 1462 meters. Pipe dimension: 630 mm. The depth of the DSD outlet will be 40m below sea level.	The construction of the DSD will involve the following key activities: **Onshore:** • Stripping of topsoil along the entire route of the DSD. Temporary storage until use for backfilling. • Excavation of the pipeline trench and temporary storage and/or disposal of excess material in a designated area. • Bedding of the trench with sand. • Laying of the pipe, surrounding the pipe with gravel and backfilling. • Restoral of the surface to original condition. **Offshore:** • Transportation of the pipe to the seaside. • Assembly of the pipe sections; welding and attaching concrete blocks, and hydraulic testing. • Offshore trench digging using pumps mounted on barges. • Placement of pipeline sections on seabed via floating, towing and immersion. • Backfilling of trench using the same barge pump and placement of gabions to anchor the pipeline.	**Need for project** The DSD enables avoiding discharge to more sensitive surface waters (i.e. local streams or rivers) while obtaining a high level of dilution of the already treated effluents. Note that prior to discharge effluents have been treated to sensitive water standards, including nitrogen and phosphorus removal.

Table 0-8 Summary of key PIP infrastructure components for Cesmeli DSD

Item (PIP)	Activities and footprint	Brief description & rationale
Cesmeli DSD infrastructure		
Construction of a deep-sea pipeline for discharging effluents. Length of pipeline: On land: 559 meters. On seabed: 1630 meters. Pipe dimension: 500 mm.	The construction of the DSD will involve the following key activities: **Onshore:** • Stripping of topsoil along the entire route of the DSD. Temporary storage until use for backfilling. • Excavation of the pipeline trench and temporary storage and/or disposal of excess material in a designated area. • Bedding of the trench with sand. • Laying of the pipe, surrounding the pipe with gravel and backfilling. • Restoral of the surface to original condition. **Offshore:** • Transportation of the pipe to the seaside. • Assembly of the pipe sections; welding and attaching concrete blocks, and hydraulic testing. • Offshore trench digging using pumps mounted on barges. • Placement of pipeline sections on seabed via floating, towing and immersion. • Backfilling of trench using the same barge pump and placement of gabions to anchor the pipeline.	**Need for project** The DSD enables avoiding discharge to more sensitive surface waters (i.e. local streams or rivers) while obtaining a high level of dilution of the already treated effluents. Note that prior to discharge effluents undergo preliminary treatment. The DSD will ensure sufficient dilution of the effluents to meet required standards.

Table 0-9 Summary of key PIP infrastructure components for Kizkalesi DSD

Item (PIP)	Activities and footprint	Brief description & rationale
Kizkalesi DSD infrastructure		
Construction of a deep-sea pipeline for discharging effluents to sea. Length of pipeline: On land: 966 meters. On seabed: 675 meters. Pipe dimension: 315 mm.	The construction of the DSD will involve the following key activities: **Onshore:** • Stripping of topsoil along the entire route of the DSD. Temporary storage until use for backfilling. • Excavation of the pipeline trench and temporary storage and/or disposal of excess material in a designated area. • Bedding of the trench with sand. • Laying of the pipe, surrounding the pipe with gravel and backfilling. • Restoral of the surface to original condition. **Offshore:** • Transportation of the pipe to the seaside. • Assembly of the pipe sections; welding and attaching concrete blocks, and hydraulic testing. • Offshore trench digging using pumps mounted on barges. • Placement of pipeline sections on seabed via floating, towing and immersion. • Backfilling of trench using the same barge pump and placement of gabions to anchor the pipeline.	**Need for project** The DSD enables avoiding discharge to more sensitive surface waters (i.e. local streams or rivers) while obtaining a high level of dilution of the already treated effluents. Note that prior to discharge effluents have been treated to sensitive water standards, including nitrogen and phosphorus removal.

Table 0-10 Summary of key PIP infrastructure components for Bozyasi DSD

Item (PIP)	Activities and footprint	Brief description & rationale
Bozyazi DSD infrastructure		
Construction of a deep-sea pipeline for discharging effluents. Length of pipeline: On land: 565 meters. On seabed: 1987 meters. Pipe dimension: 315 mm.	The construction of the DSD will involve the following key activities: **Onshore:** • Stripping of topsoil along the entire route of the DSD. Temporary storage until use for backfilling. • Excavation of the pipeline trench and temporary storage and/or disposal of excess material in a designated area. • Bedding of the trench with sand. • Laying of the pipe, surrounding the pipe with gravel and backfilling. • Restoral of the surface to original condition. **Offshore:** • Transportation of the pipe to the seaside. • Assembly of the pipe sections; welding and attaching concrete blocks, and hydraulic testing. • Offshore trench digging using pumps mounted on barges. • Placement of pipeline sections on seabed via floating, towing and immersion. • Backfilling of trench using the same barge pump and placement of gabions to anchor the pipeline.	**Need for project** The DSD enables avoiding discharge to more sensitive surface waters (i.e. local streams or rivers) while obtaining a high level of dilution of the already treated effluents. Note that prior to discharge effluents have been treated to sensitive water standards, including nitrogen and phosphorus removal.

APPENDIX 2: STAKEHOLDER ENGAGEMENT LOG

MESKI will be responsible for updating the stakeholder engagement log with all activities undertaken before and during the construction phase of the Project and during the subsequent operation phase.

Date	Involved stakeholders	Purpose of engagement	Means of engagement	Concerns raised by stakeholders, if any