

TÜRKİYE

OSMANIYE WASTEWATER PROJECT FEASIBILITY STUDY

EBRD Contract No. 2024.011366



Stakeholder Engagement Plan

September 2025

ACRONYMS AND ABBREVIATIONS

CLO	Community Liaison Officer
DSI	State Hydraulic Works
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
FGD	Focus Group Discussion
Ilbank	İller Bankası A.Ş.
PIP	Priority Investment Programme
PIU	Project Implementation Unit
RDF	Refuse Derived Fuel
SEP	Stakeholder Engagement Plan
WWTP	Wastewater Treatment Plant

The term “mukhtars” is used below. This is the Turkish term for neighbourhood leaders.

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1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the proposed Osmaniye Wastewater Treatment Plant (WWTP) Project (referred to as the 'Project' in the following). The Project is planned and implemented by Osmaniye Municipality (the 'Municipality') and Iller Bankası A.S. ('İlbank') in Türkiye and is expected to receive loan financing from the European Bank for Reconstruction and Development (EBRD).

The objectives of the SEP¹ are to:

- Outline a systematic approach to stakeholder engagement that will help Osmaniye Municipality 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 parts of the Project components may be completed in 2027.
- The operation phase of the Project, which is subsequent to completion of construction, includes a defects notification period of 12 months.

The SEP will be publicly available in Turkish and English languages at the Municipality's website and as printed copies at the Municipality. 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

The existing WWTP operated by Osmaniye Municipality is currently overloaded, leading to poor effluent quality and several issues, primarily pollution of the receiving water body Ceyhan River. Osmaniye City, to which the Municipality provides water supply and wastewater services, has a registered population of around 243,400 and experienced an average annual population growth of around 1.2% over the last ten years. Additionally, it is estimated that around 47,000 people live in Osmaniye City but are not included in the official population count. These are mainly Syrians under temporary protection and unregistered Syrian refugees as well as students at Osmaniye Korkut Ata University who reside in the City but remain registered elsewhere.

A Feasibility Study was carried out in September 2024 – March 2025 and resulted in a Priority Investment Programme (PIP). A proposed Long-Term Investment Strategy has also been developed.

This SEP relates to construction activities in connection with the proposed EBRD-supported PIP, which will be implemented from 2026-2028, and the subsequent operations. The PIP is summarized in the table below.

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
WWTP	Construction of a new WWTP at the same site as the existing WWTP. The new WWTP will extend the design capacity of the existing WWTP from 50,000 m ³ /day (250,000 PE) to 75,000 m ³ /day (350,000 PE) capacity.
Effluent Discharge Pipeline	Replacement of the existing piped effluent discharge system with a new effluent discharge pipeline with a total length of 6.1km at a diameter of 1200mm. The new discharge pipeline will follow the same route as the existing discharge pipes.

A more detailed Project description is included in Appendix 1.

The two maps below show the location of the Project components.



Figure 2-1 Osmaniye WWTP site outlined in red, with areas planned for construction coloured. Potential residential buildings marked in yellow, residential buildings currently under construction marked in purple, livestock facilities marked in blue, and formal slaughterhouse marked in orange.

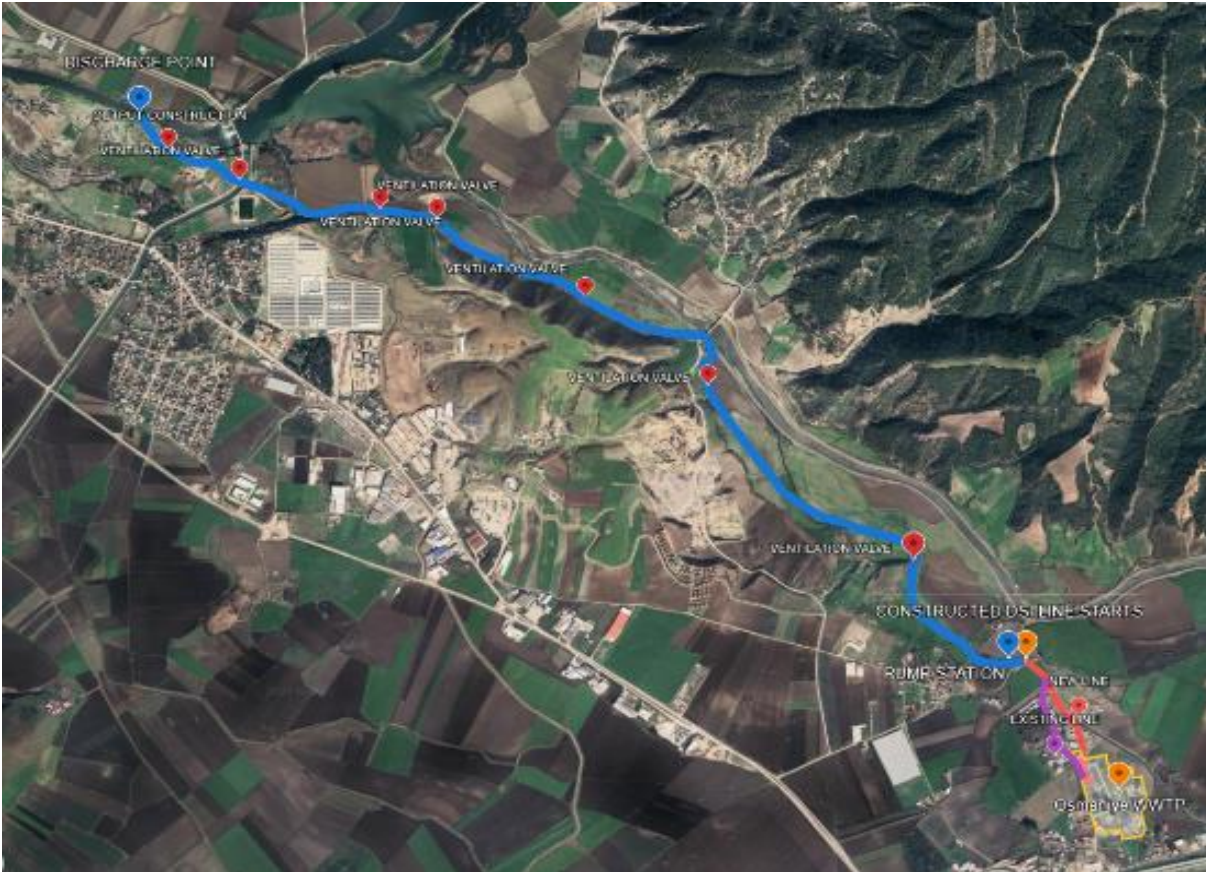


Figure 2-2 Existing effluent discharge pipe (first part marked in pink and the second part in blue)

3 RESPONSIBILITY FOR IMPLEMENTATION OF THIS SEP

The PIU which is to be established by Osmaniye Municipality is responsible for implementing the investments included in the PIP, while the Municipality's Water and Sewerage Directorate supported by other municipal Directorates is 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 Osmaniye Municipality's Press and Public Relations Directorate is responsible for these activities during the subsequent operations.

4 REGULATORY REQUIREMENTS

The Constitution of Republic of Türkiye is the fundamental document which guarantees 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 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 applicable to public institutions, including municipalities, and 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 requested information or documents 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. Despite this, it is mandatory in Türkiye to hold a public participation meeting for all so-called Annex-1 projects as described in the national Environmental Impact Assessment (EIA) regulation from 2022. A stakeholder engagement plan is also to be prepared for so-called Annex-1 projects. The proposed Project has, however, been exempted by the Provincial Directorate of Environment, Urbanization, and Climate Change from the national EIA Bylaw.

For the current Project, Osmaniye Municipality is therefore not required by national legislation 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 form 2019, 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 Osmaniye Municipality's Public Relations Directorate 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 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

An overview of Osmaniye Municipality's water and wastewater related communication activities and grievance mechanism is presented in section 6.1 and 6.2, while focus group participants' views on the Municipality's stakeholder engagement and grievance management are summarised in section 6.3.

The Project-specific stakeholder engagement activities mentioned in this SEP build on previous activities as summarised in this chapter as well as the views of focus group participants.

6.1 Osmaniye Municipality's Water and Wastewater related Communication Activities

The Directorate of Press and Public Relations is overall responsible for communication related to the water and wastewater services of Osmaniye Municipality. The Directorate is also responsible for organising public hearings and meetings in connection with the construction of infrastructure projects.

The following are the main topics related to water supply and wastewater on which information is provided:

- Interruptions of the water and wastewater services and scheduled repairs.
- Status of water and wastewater related activities and plans, including planned investments.
- Results of water quality monitoring.
- Awareness campaigns on various topics, e.g., sustainable water consumption.

The Directorate of Press and Public Relations disseminates information through various channels:

- Osmaniye Municipality's web page, <https://osmaniye-bld.gov.tr/>
- Mass media (radio, newspapers, and online tv-channel)
- Different social media: Facebook, X, Instagram, Telegram and LinkedIn. Social media is used to both receive opinions and complaints from the public and to announce news regarding water and wastewater activities in Osmaniye Municipality.
- Leaflets and brochures.
- A monthly newspaper covering various activities.
- Public meetings, which the Directorate of Press and Public Relations arranges in connection with new infrastructure projects, including in connection with the start of construction activities.

As mentioned above, public meetings in relation to infrastructure projects are arranged and managed by the Directorate of Press and Public Relations. Prior to construction, consultation meetings are conducted with mukhtars (local leaders of neighbourhoods), NGOs, the press, and possibly other stakeholders. Key information is provided to the public at a relatively early stage, while public meetings are held after construction work has been tendered.

At this stage, the Municipality has informed the public and various public institutions that a new WWTP is planned to be constructed at the same site as the existing WWTP. No further details were provided to the public.

6.2 Osmaniye Municipality's Grievance Mechanism

Households and other stakeholders can use the following channels to raise and submit their grievances:

- The Information Desk located at the Municipality's main building which is manned during the normal opening hours.

- Emails sent to the Municipality.
- The Municipality's website, <https://osmaniye-bld.gov.tr/>, using the contact form.
- The social media channels described previously.
- The Municipal Call Centre which is operated 24/7 and can take up to 6 calls at a time. The call centre is normally staffed by around 30 people, but in periods where additional calls are foreseen, the number of staff is increased.
- Using the suggestion/request/grievance box located at the Municipality's main building. The box is used by both employees and customers/stakeholders and is emptied every 10 days.
- Through the Presidential Communication Centre (CIMER).

Once a complaint is submitted through one of the specified channels above, it is forwarded to the appropriate directorate at the Municipality. The timeline for an internal response varies based on the urgency of the complaint. Urgent cases must be addressed within 48 hours, while more complex issues may take up to 15 or sometimes 30 days to resolve. In some situations, if the matter is escalated to court, it may take longer. According to the Directorate of Press and Public Relations this is very rare, and there has been no such case in connection with water or wastewater complaints.

Prior to the Covid-19 pandemic and the earthquake in 2023, the Municipality undertook annual satisfaction surveys among its citizens. The survey results were used for strategic planning, and the surveys included questions on water supply and wastewater services. The surveys were carried out by an external consulting company.

6.3 Views from Focus Groups

Three focus group discussions (FGDs) were held in December 2024 with residents of Yunus Emre, the neighbourhood where the WWTP is located, and farmers from the villages in close proximity to either the WWTP or the discharge point. In total 11 women and 23 men participated in the FGDs.

All groups expressed dissatisfaction with the communication from the Municipality regarding the operations of the existing WWTP. Participants reported a lack of sufficient information about the WWTP's current operation, such as the cleaning schedule for the sludge beds. Moreover, residents in Yunus Emre indicated that they often feel ignored by the Municipality if they raise complaints related to water supply or wastewater issues. Residents often contact their mukhtar, who then contacts the Municipality. However, according to focus group participants, complaints rarely result in any sufficient or worthwhile solutions, which has caused great frustrations among residents.

A strong wish was expressed for improved communication and engagement from the Municipality. Participants were generally open to many different information channels and suggested that information could be disseminated through newsletters, newspapers, and social media. Public information meetings were also highly requested among participants across all three focus groups. Furthermore, local farmers expressed interest in visits to the WWTP and possibly other facilities.

Moving forward, Osmaniye Municipality will appoint a full-time community liaison officer (CLO), who will focus on community-level communication and engagement as well as grievances during the construction phase of the Project as well as the subsequent operations. Training will also be conducted for other staff on stakeholder engagement and grievance management.

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	
<ul style="list-style-type: none"> General Directorate of Infrastructure Investments Ministry of Environment, Urbanization, and Climate Change Ministry of Culture and Tourism Ministry of Interior, General Directorate of Population and Citizenship Affairs State Hydraulic Works (DSİ) General Directorate Ministry of Health 	<ul style="list-style-type: none"> National and regional development Policy formulation and Planning Permitting Protection of cultural and archaeological heritage during construction Administrative coordination, updating of population data in affected areas Water resource management, alignment with existing water infrastructure Public health and sanitation benefits, monitoring potential health risks from wastewater
National-Level Civil Society Organizations	
<ul style="list-style-type: none"> Water Foundation TEMA Foundation Nature Community Union of Historical Towns Wildlife Conservation Association Greenpeace 	<ul style="list-style-type: none"> Protection of water resources, sustainable water use advocacy Environmental sustainability, forest conservation, and mitigation of soil erosion Protection of local biodiversity and ecosystems Preservation of historical sites and cultural heritage near project areas Ensuring wastewater treatment does not harm local wildlife habitats Environmental impact monitoring, climate-related advocacy, and sustainability
Osmaniye Municipality	
<ul style="list-style-type: none"> Mayor The Municipal Council City Council Various Directorates within the Municipality Osmaniye Strategic Research Center (OSAM) 	<ul style="list-style-type: none"> The benefits of the Project for residents in Osmaniye City. Cooperation on regulation of traffic during construction phase. Compliance with legislation, e.g., on approvals. Public engagement, urban development planning Coordination of relevant municipal services Research, local policy alignment, and monitoring project impacts
Local Governmental Organisations	
<ul style="list-style-type: none"> Governorship of Osmaniye Osmaniye Provincial Special Administration Osmaniye Provincial Planning and Coordination Directorate Provincial Directorate of Environment, Urbanization, and Climate Change Provincial Directorate of Culture and Tourism DSİ Regional Directorate Osmaniye Provincial Directorate of Agriculture and Forestry Provincial Health Directorate Osmaniye Provincial Directorate of Population and Citizenship Affairs 	<ul style="list-style-type: none"> Social and economic development Environmental protection Protection of cultural assets and historical sites Management of environmental impacts (e.g. waste, 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 Water resources management and infrastructure integration

Key Stakeholders	Specific Interests in / Relevance for Project
<ul style="list-style-type: none"> Osmaniye Provincial Directorate of Disaster and Emergency Management Provincial Directorate of National Education Osmaniye Regional Directorate of State Highways Toroslar Electricity Distribution Company (EDAŞ) 	<ul style="list-style-type: none"> Protection of agricultural land, water usage in irrigation Public health monitoring and mitigation of disease risks Administrative oversight of population impacts Raising awareness on environmental protection and water conservation Power supply to wastewater treatment facilities
Non-Governmental Organisations in Osmaniye	
<ul style="list-style-type: none"> Union of Chambers of Turkish Engineers and Architects (TMMOB) in Osmaniye Provincial Representation Chamber of Civil Engineers in Osmaniye Provincial Representation Osmaniye Bar Association (Including Environmental and Urban Law Commission) Republic of Turkey Eastern Mediterranean Development Agency (DOGAKA) TEMA Foundation Ceyhan Right Bank Irrigation Union Ceyhan Left Bank Irrigation Union 	<ul style="list-style-type: none"> Environmental and social impacts Cumulative impacts Inclusivity and accessibility Security impacts Technical oversight, engineering, environmental impact assessment and monitoring, sustainability initiatives Infrastructure safety, compliance with engineering standards Legal compliance, advocacy for residents' rights, and environmental justice Economic development, funding opportunities, and regional coordination Ensuring treated water quality for agricultural use Managing irrigation needs and water quality concerns
Mukhtars/Local Communities/Residents	
Residents (women and men), businesses and organisations in the Project areas	<ul style="list-style-type: none"> Improved wastewater services, including reduced odour from the WWTP and effluent discharge Established health protection buffer zone within the WWTP site Employment opportunities Concerns that they may be negatively affected during the construction phase (traffic, noise, community health and safety, livelihood impacts, gender-based violence and harassment)
Landowners who will be affected by the establishment of easement rights in their agricultural land for the new effluent discharge pipeline	<ul style="list-style-type: none"> Improved wastewater services, including reduced odour from the WWTP and effluent discharge Concerns that they may be negatively affected during the construction and maintenance/repairs of the discharge pipeline Concerns that they will not be fairly compensated for the easement rights established in their agricultural land
Neighbourhood headmen (mukhtars)	<ul style="list-style-type: none"> Improved wastewater services, including reduced odour from the WWTP and effluent discharge Potential negative impacts for residents during the construction phase Important role in dissemination of information about the Project
Municipal employees, particularly those involved in the Municipality's water supply and wastewater services	<ul style="list-style-type: none"> The influence of the Project on their work The benefits of the Project for the Municipality and its water supply and wastewater customers Opportunities for professional development Dissemination of information on the Project
Academic Institutions	
Osmaniye Korkut Ata University	<ul style="list-style-type: none"> Research collaboration, environmental and social impact studies, technical expertise
Media (local and national)	
<ul style="list-style-type: none"> Anadolu News Agency İhlas News Agency Demirören News Agency 	<ul style="list-style-type: none"> National-level reporting and public awareness Providing regular information about the Project

Key Stakeholders	Specific Interests in / Relevance for Project
<ul style="list-style-type: none"> • Başak Gazetesi • Medya Gazete • Osmaniye Akdeniz Gazetesi • Haberde Önder Gazetesi • Osmaniye Haber • Radyo 2000FM • Radyo 80 FM • Radyo Gönül FM • Radyo İhsam FM • Radyo Meşale FM • Radyo Yakamoz FM • Radyo Mega • Radyo Akdeniz • Kanal 80 • ORT TV 	<ul style="list-style-type: none"> • Bringing Project announcements at the request of the Municipality and its PIU • Community engagement and media outreach

The communication methods to be used for this Project will be based on those currently used by Osmaniye Municipality, possibly supplemented by other methods. The main communication methods before and during the construction phase will thus be:

- Osmaniye Municipality's web page, <https://osmaniye-bld.gov.tr/>
- Mass media (radio, newspapers, and online tv-channel)
- Different social media: Facebook, X, Instagram, Telegram and LinkedIn.
- Leaflets and brochures.
- A monthly newspaper covering various activities.
- Public 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.

Osmaniye Municipality is to establish good communication with residents living close to the WWTP 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. The Municipality's CLO, who will be a full-time member of the PIU, will play a key role in this connection. Furthermore, contractors will be required to inform and engage with local communities and other stakeholders about the detailed construction activities, the time schedule of these, detailed community health and safety aspects, and the channels for submission of grievances to the contractors. Information is to be provided in Turkish and, if needed, in Arabic. The latter is to be determined after the Municipality/PIU has obtained further details about the residents living close to the WWTP.

The CLO will work closely with local leaders to identify vulnerable groups in the Project areas to ensure that Project information reach these groups and will share such information with relevant contractor(s).

8 STAKEHOLDER ENGAGEMENT PROGRAMME

8.1 Stakeholder Engagement and Communication prior to and during Construction

Before the construction works starts, the PIU and the Municipality's Press and Public Relations Directorate 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 parts of Osmaniye City, with particular focus on the areas that will be most affected by construction activities.

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, opportunities for public comments, and the grievance mechanism will also be posted in local newspapers. 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 Osmaniye Municipality in Turkish and English and also made available in hard copy at the premises of the Municipality.

At least one public meeting will be held to inform about the Project and the start of construction activities. The meeting(s) will be held at a location that is accessible to, and encourage the participation of different stakeholders. Participants in the public meeting will be encouraged to ask questions and provide comments during the meeting(s). The specific date and place for the public meeting(s) will be decided when the approximate start of construction activities is known. The conclusions of the public meeting(s) will be agreed during the meetings and recorded.

Information about the Project will also be available on request.

Local and site-specific information will be distributed through contractors and mukhtars (neighbourhood leaders). Mukhtars can contact the PIU for local and site-specific information.

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.

The table below presents an overview of the stakeholder engagement and communication activities during the construction phase.

Table 8-1: Stakeholder Engagement Programme during Construction

Target Groups	Contents of Information	Means of Communication	Responsible	Timeframe
All stakeholders in Osmaniye	<p><u>Main organisations:</u> The PIU established by Osmaniye Municipality is overseeing Project construction activities, while the Municipality will be responsible for the subsequent operations. Contractors will be engaged to do the actual construction work.</p> <p>The PIU is responsible for stakeholder engagement and communication activities before and during construction, while Osmaniye Municipality is responsible for this during the subsequent operations. The Municipality's CLO, who will be a member of the PIU during construction, will be the main person responsible for coordinating and implementing stakeholder engagement and communication activities before and during construction and also during the subsequent operations. She/he will coordinate closely with contractors who will inform and engage with local communities and other stakeholders about the detailed construction activities.</p> <p>Osmaniye Municipality's PIU will be the 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.</p> <p>The PIU will also be responsible for structured responses to grievances (see section on grievance procedures).</p>	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars	Prior to and during construction
All stakeholders in Osmaniye	<p><u>Main Project components:</u></p> <ul style="list-style-type: none"> Construction of a new WWTP, which will extend the existing WWTP's design capacity of 50,000 m³/day (250,000 PE) to 75,000 m³/day (350,000 PE) capacity. For sludge management, the plant will implement sludge thickening, anaerobic digestion and biogas combustion for electricity production, dewatering and thermal drying. The existing 6.1 km effluent pipe discharge system will be replaced with a larger pipe. The new pipe is to follow the same route as the existing pipes to minimise any potential impacts. 	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars	Prior to and during construction
All stakeholders in Osmaniye	<u>Tentative timelines for Project phases:</u>	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary 		Prior to and during construction

Target Groups	Contents of Information	Means of Communication	Responsible	Timeframe
	<ul style="list-style-type: none"> 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. <p>Information will be provided in the Project areas about the specific construction period when this has been decided.</p>	<ul style="list-style-type: none"> Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars	
All stakeholders in Osmaniye	<p><u>Areas to benefit / be affected</u></p> <p>All parts of Osmaniye City will benefit from the Project, with residents, farmers, businesses, and other organisations in the vicinity of the existing WWTP and the existing effluent discharge pipeline experiencing the most immediate benefits. The latter will, however, also be most affected by disturbances during the construction phase.</p>	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars	Prior to and during construction
All stakeholders in Osmaniye	<p><u>Opportunities and main benefits, mainly when construction is complete</u></p> <ul style="list-style-type: none"> 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. In particular, significant positive impacts on the Ceyhan River is expected as a result of this Project. Closely associated with the water quality of the Ceyhan River is the ecological state of the Kastabala Wetland; the Project is expected to have positive impacts on the ecological state and ecosystem of the Kastabala Wetland. Reduction in greenhouse gas emissions by providing modern tertiary treatment processes for wastewater. Some reduction in water and sanitation related diseases. Employment opportunities during the construction phase. 	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars	Prior to and during construction

Target Groups	Contents of Information	Means of Communication	Responsible	Timeframe
All stakeholders in Osmaniye	<u>General grievance procedure during construction</u> <ul style="list-style-type: none"> Description of the grievance procedure to be used during construction (see section 9.1 below) Organisation to contact (see chapter 11 below) 	<ul style="list-style-type: none"> Stakeholder Engagement Plan Non-Technical Summary Announcement in local newspapers The Municipality's website Social media messages Brochure to be distributed in public places in the Project areas, including for example shops, and schools 	Osmaniye Municipality's PIU in cooperation with mukhtars and contractors	Prior to and during construction
<p>Local residents (women and men), persons working at livestock facilities, landowners, businesses etc. in areas most affected by construction activities</p> <p>Particular efforts will be made to ensure that both women and men from different population groups, including from potential vulnerable groups, are aware about the public meeting, the venue, and time.</p>	<p>Introduction to Project components, Project benefits, the timeframe for construction, PIU members and their main responsibilities.</p> <p>Participants will be encouraged to ask questions and provide comments during the meeting(s).</p>	<p>At least one public meeting in the Project area.</p> <p>The specific date and place for the public meeting(s) will be decided when the approximate start of construction activities is known.</p> <p>Announcement of the public meeting(s), its location, date and time will be announced well in advance of the meeting(s). Announcement will be</p> <ul style="list-style-type: none"> In local newspapers in Turkish. Most relevant newspapers at time of announcement to be identified by the PIU. Notices at boards at the offices of relevant mukhtars. <p>The conclusions of the public meeting(s) will be agreed during the meeting(s) and recorded. The PIU will prepare and make minutes of the meeting(s) available on Osmaniye Municipality website and also at the office of relevant mukhtars.</p>	Osmaniye Municipality's PIU in cooperation with mukhtars	Prior to construction

Target Groups	Contents of Information	Means of Communication	Responsible	Timeframe
Local residents (women and men), persons working at livestock facilities, landowners, businesses etc. in areas most affected by construction activities	<p><u>Notification in the Project areas at the beginning of construction work:</u></p> <ul style="list-style-type: none"> • Reminder of traffic changes and parking restrictions in areas where works will commence and the time schedule for the works • For emergencies or grievances, contact telephone number for the Municipality's PIU and the relevant mukhtar offices to be posted close to works sites. 	<p>Posters in relevant Project areas Community meetings Social media</p>	Osmaniye Municipality's PIU, in cooperation with contractors and through relevant provincial/municipal directorates	Prior to and during construction
<p>Local residents (women and men), persons working at livestock facilities, landowners, businesses etc. in areas most affected by construction activities</p> <p>Particular efforts will be made to ensure that both women and men from different population groups, including from potential vulnerable groups, are informed.</p>	<p><u>Impacts during construction and key mitigation actions</u></p> <p>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:</p> <ul style="list-style-type: none"> • Continuous maintenance of machinery and equipment • Avoid using potential high-noise generating equipment at the same time. • 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. <p>Dust from excavated materials which may be of nuisance to both workers and local residents:</p> <ul style="list-style-type: none"> • 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. <p>Risk of road / pedestrian accidents due to construction activities and temporary restrictions in access to various facilities:</p> <ul style="list-style-type: none"> • 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 	<p>Osmaniye Municipality's web page Mass media Social media Community meetings Posters and potential handouts by contractors</p>	Osmaniye Municipality's PIU in cooperation with contractors and mukhtars	Prior to and during construction

Target Groups	Contents of Information	Means of Communication	Responsible	Timeframe
	<p>construction activities as well as temporary traffic arrangements.</p> <ul style="list-style-type: none"> • Cordon-off any works in public areas to prevent accidents. • Inform local residents and landowners about community health and safety risks in connection with trench work. <p>Workers' accidents and/or injuries:</p> <ul style="list-style-type: none"> • 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. <p>Furthermore, description of stakeholder engagement activities and the community grievance mechanism.</p>			
Local residents (women and men), persons working at livestock facilities, landowners, businesses etc. in areas most affected by construction activities	Local and site-specific information	Community meetings Meetings with individual residents Posters and potential handouts by contractors	Contractors and mukhtars Mukhtars can contact the CLO or other PIU members for local and site-specific information.	During construction Response to local inquiries will be an ongoing activity during the construction phase
Private landowners affected by establishment of easement rights for the new effluent discharge pipeline	<p><u>Establishment of easement rights for the new discharge pipeline:</u></p> <ul style="list-style-type: none"> • The benefits of replacing the discharge pipeline in the agricultural land of identified landowners and reasons why easement rights need to be established in their land. • Contractors will be required to replace the discharge pipeline in privately owned land outside of the agricultural cultivation period, to the extent possible, to avoid or minimise damage to and loss of crops. • Compensation to private landowners for potential damage to and loss of crops during construction and/or operations. • Full restoration of the land of private landowners after construction activities and maintenance/repairs. 	Meetings with affected landowners	Osmaniye Municipality and its PIU The private landowners can also contact the CLO and other PIU members for additional information.	Prior to construction (easement rights need to be established and registered before start of construction)

8.2 Stakeholder Engagement and Communication during the Operations Phase

During the operations phase, Osmaniye Municipality 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 WWTP and effluent discharge pipeline constructed as part of the Project.
- Planned interruptions of the water and wastewater services and scheduled repairs.
- Tariff increases.
- Status of activities and plans for the Municipality's water supply and wastewater services, including planned investments.
- Results of water quality monitoring.
- Awareness campaigns on various topics, e.g., sustainable water consumption.
- Grievance mechanism and contact information.

Similar communication methods will be used in the operations phase as before and during construction, as presented in chapters 7 and 8 above.

9 PUBLIC GRIEVANCE MECHANISM

9.1 ILBANK's Grievance Mechanism

In September 2021, ILBANK established a transparent and comprehensive Grievance Mechanism (GM) in order to receive, evaluate and address grievances pertaining to every international project it finances and/or implements, and a relevant mechanism will be in place during the course of this Project.

ILBANK's Grievance Mechanism, which is explained below, forms part of the background for Osmaniye Municipality's Public Grievance Mechanism during the Construction Phase, as presented in section 9.2.

The operational flow of ILBANK's Grievance Mechanism for stakeholders will be as follows:

- 1. Dissemination of GM.** Communication and information tools will be prepared to disseminate information about the grievance mechanism. The Project stakeholders will be informed regarding the available GM, its intake channels and operational procedures. The communication and informative tools to be developed are listed, but not limited to the following:
 - a. Web page (ILBANK)
 - b. E-mail address (ILBANK)
 - c. Consultation meetings
 - d. Telephone (ILBANK)
- 2. Submission of grievances and requests to ILBANK.** ILBANK includes several uptake channels for its GM.

Grievance/ Suggestion Boxes	Grievance/Suggestion Boxes will be placed in the Department of International Relations of ILBANK and in project sites. These boxes will be made available for all project workers and will be located at convenient places to enable the workers to submit their grievances or requests confidentially and/or anonymously.	
Phone	+90 312 508 79 79	
E-mail	uidbbilgi@ilbank.gov.tr	
Official Letter	ILBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara	
Presidency Communication Center (CIMER)	Webpage	www.cimer.gov.tr
	Call Center	150

<i>The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and is a well-known channel for conveying their Project-related grievances and feedback directly to state authorities.</i>	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the community relations desks at governorates, ministries and district governorates	
Foreigners Communication Center (YIMER) <i>The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and is a well-known channel for conveying their Project-related grievances and feedback directly to state authorities.</i>	Webpage	www.yimer.gov.tr
	Call Center	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the Republic of Türkiye General Directorate of Migration Management	

3. All the grievances received through the above channels will be collected at the ILBANK.
4. The grievances received will be recorded into the database by GM Focal Points in the PIU.
5. GM Focal Point who filed the grievance to confirm the receipt of the grievance by telephone and/or email within 2 working days.
6. GM Focal Point prepares the draft response and submits it to the approval of the relevant Project Management (GM Team).
7. Following the response, the Grievance Form will be updated according to the outcome of the process and the complainant will receive the result within 13 working days. If the complaint is valid, then identifying and taking the required action is to happen within 15 working days. With the acceptance of the resolution by the applicant within 30 days, the case is closed. In case the applicant is not satisfied with the response and does not sign the Complaint Form, the GM Focal Point will organize a meeting with the PIU management, with the participation of the complainant, associated members of the PIU and the relevant construction contractor. The complainant will share his/her concern with the management. The meeting will try to propose another solution to the complainant for the resolution that both parties can agree on.
8. If the complainant is still not satisfied with the outcome of the process, he/she may pursue their complaint through legal channels in the country.
9. A monitoring and evaluation system has been established. The monitoring is recorded in the monitoring and evaluation system.

The most important point in the GM is to ensure that all requests are effectively received and recorded in a timely way, responded to and resolved within a predetermined timeline and on the basis of the content of the complaint. This has to be done by GM Focal Point, and proposed corrective/regulatory action has to be acceptable to both parties, or the complainant can pursue legal recourse. Additionally, the mechanism has to allow for anonymous complaints to be addressed and handled, including those related to sexual exploitation and abuse/sexual harassment (SEA/SH).

9.2 Osmaniye Municipality's Public Grievance Mechanism during Construction Phase

Osmaniye Municipality has a relatively well functioning grievance mechanism, which – after potential adjustments based on ILBANK's grievance mechanism explained in section 9.1 – will be used for Project related grievances. The Municipality's CLO will ensure that all project-related grievances are registered in the Municipality'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 allows 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, including those submitted to contractors, 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. Grievances or concerns about gender-based violence or harassment by contractor staff, municipal staff, or others will be investigated and handled carefully in a sensitive and confidential way.

Project-related grievances can be submitted through the channels mentioned in section 6.2 above, ILBANKS grievance mechanism explained in section 9.1, and can also be conveyed through contractor's representatives, Osmaniye Municipality's CLO, and mukhtars. The Municipality 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 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 Osmaniye Municipality 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 Osmaniye Municipality 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 PIU contact person.

The external grievance mechanism is to be applied as described in the figure below and as explained earlier in this section. 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.

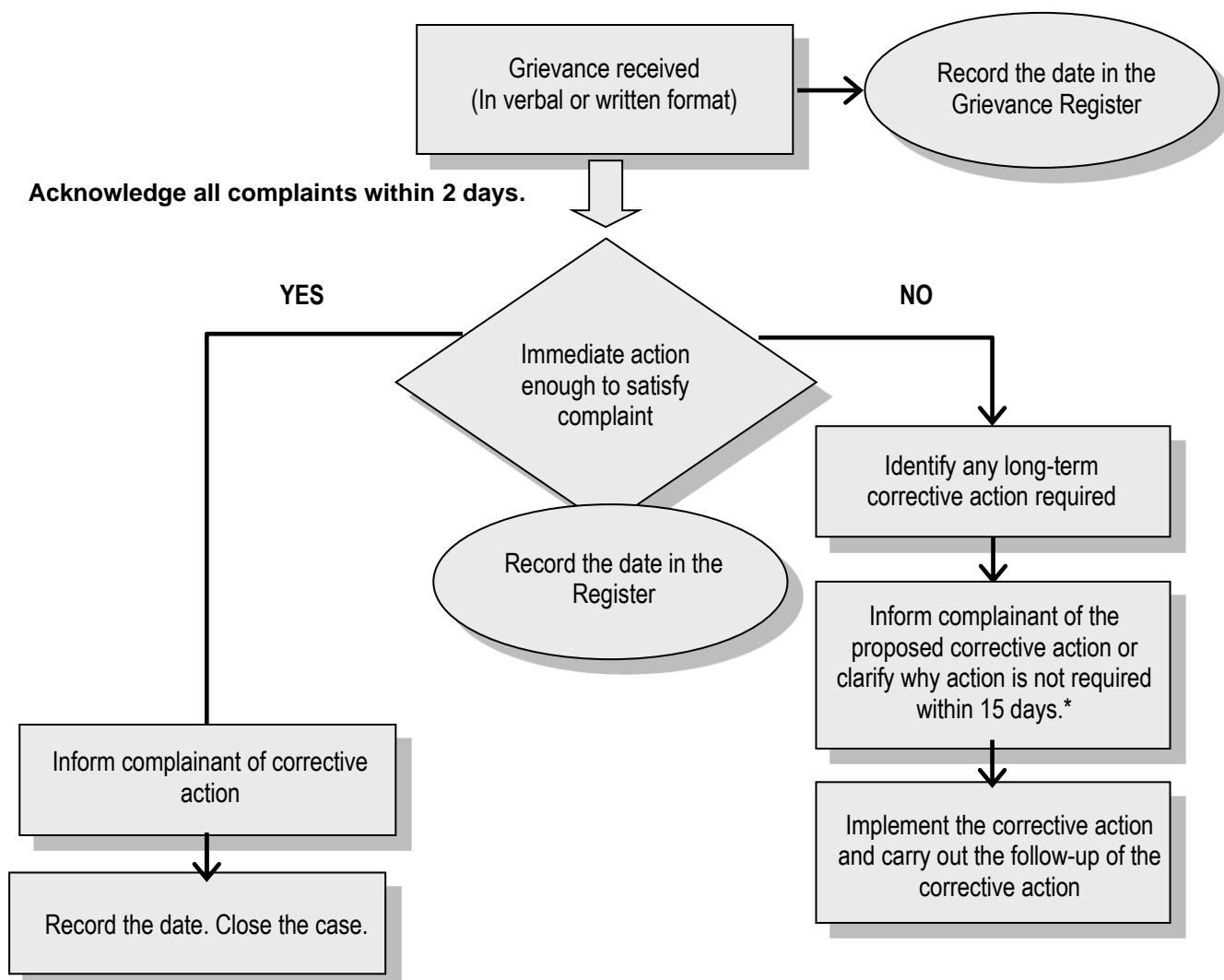
9.3 Osmaniye Municipality's Public Grievance Mechanism during Operation Phase

Osmaniye Municipality 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.

9.4 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. Projects are required to meet these requirements, 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 9-1: The Grievance Procedure

For each grievance, a record sheet shall be filled in either by the complainant in cases where the complainant appears personally at the Osmaniye Municipality office or when receiving a complaint by phone, e-mail, post or through the Municipality's 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).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Turkish <input type="checkbox"/> 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	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:

Osmaniye Municipality

Address: Rahime Hatun Mahallesi Musa Şahin Bulvarı No: 375 Osmaniye /Türkiye

Email: osmaniyebelediyesi@osmaniye-bld.gov.tr

10 CONTACT INFORMATION

The PIU which is to be established by by Ilbank (involving representatives of Osmaniye Municipality as well) is responsible for the implementation of stakeholder engagement and communication activities during the construction phase, while the Municipality's Directorate of Press and Public Relations is responsible for these activities during the subsequent operations. The following is the contact information (when the CLO is appointed, her/his contact information will be added below):

Ilbank

Address: Emniyet, Hipodrom Cd. 9/21, Yenimahalle/Ankara

Email: pybafet@ilbank.gov.tr

Telephone: 0(312) 508 70 00

Website: <https://www.ilbank.gov.tr>

Osmaniye Municipality

Address: Rahime Hatun Mahallesi Musa Şahin Bulvarı No: 375 Osmaniye /Türkiye

Email: osmaniyebelediyesi@osmaniye-bld.gov.tr

Telephone: (0328) 440 00 80

Website: <https://www.osmaniye-bld.gov.tr>

APPENDIX 1: DETAILED PROJECT DESCRIPTION

Summary of key PIP infrastructure components for Osmaniye WWTP

Item (PIP)	Activities and footprint
Construction of a new WWTP, which will extend the existing WWTP's design capacity of 50,000 m ³ /day (250,000 PE) to 75,000 m ³ /day (350,000 PE) capacity (Design Horizon 2041).	<p>The new WWTP will be constructed within the boundaries of the existing 10.5 ha. The health buffer zone requirement for the new WWTP has reduced the available land for the construction of the new WWTP from approx. 10.5 ha to approx. 5 ha. This area is considered sufficient for the construction of the new WWTP, please see further information concerning the buffer zone requirement further below in the table.</p> <p>Although a design is available for the Osmaniye WWTP, the location requires to be changed to the requirements of a safety buffer zone, hence the design is not suitable to support a FIDIC "Red Book" contract. It is proposed to contract the Osmaniye WWTP works via a FIDIC Design-Build contract ("Yellow Book").</p> <p>The Conventional Activated Sludge (CAS) process, designed for comprehensive removal of carbon, nitrogen, and phosphorus, was selected as the most suitable approach for wastewater treatment. Effluents will meet sensitive water standards at point of discharge.</p> <p>For sludge management, the plant will implement sludge thickening, anaerobic digestion and biogas combustion for electricity production, dewatering and thermal drying.</p> <p>In terms of treated sludge disposal. Sludge is currently dewatered and sent to a "Refuse Derived Fuel" facility (RDF) prior to final transport to a cement factory for combustion in cement kilns. This will continue as a long-term solution for the final disposal of sludge. Long term agreements with the RDF facility and cement factory should be investigated by the Water and Sewerage Directorate.</p> <p>Currently, the opportunity for sludge re-use in agriculture is not mature, however this could be a disposal option to be considered in the future.</p>
Replacement of discharge pipeline	<p>To accommodate the future capacity of the new WWTP and continue to discharge directly to the Ceyhan river, it is proposed to replace the existing pipe discharge system consisting of the 4.8 km of HDPE (800mm) pipeline and the approx. 1.3 km of DN1000 mm reinforced concrete pipe with a new 6.1km of Ø1400mm HDPE pressure pipe.</p> <p>The new discharge pipe is proposed to follow the same route as the existing pipes to minimise any potential impacts.</p> <p>There is no detailed design available for the new discharge pipe, hence it is proposed to contract the pipeline construction works as "Design-Build" contract via FIDIC Yellow Book (2017) conditions of contract.</p> <p>The discharge pipe is exempt from the national EIA procedure. However, a 400 meter section of the wastewater discharge pipeline to be constructed under the project is located within the Kastabala Wetland area. The conditions for activities to be carried out within wetlands are defined in the Regulation on the Protection of Wetlands. Annex-2 of this Regulation lists the Activities Requiring Ministry Approval in Wetland Protection Zones. Once the final design of the proposed wastewater discharge pipeline is completed, Osmaniye Municipality will obtain the necessary permit for this section from the 7th Regional Directorate of Nature Protection and National Parks for the section of the pipeline that falls within the Kastabala Wetland area.</p>

Item (PIP)	Activities and footprint
	<p>Considering the project's public interest and the specific provisions of the Final Kastabala Wetland Management Plan—which emphasizes the urgency of resolving technical issues related to the domestic wastewater treatment plant and ensuring treated wastewater is discharged into the area—it is not anticipated that there will be any objection to providing the required permit.</p> <p>Considering the project's public interest and the provisions of the Final Kastabala Wetland Management Plan—which emphasizes the urgency of resolving technical issues related to the domestic wastewater treatment plant and ensuring treated wastewater is discharged into the area—it is not anticipated that there will be any risk in obtaining the required permit.</p>
Slaughterhouse near WWTP site	<p>There is a slaughterhouse nearby the WWTP that discharges without pre-treatment into the sewer network before the inlet to the WWTP, see section 4.2.8. The pollution load from the slaughterhouse to the WWTP has considerable impact on the current WWTP operation. Hence, industrial pre-treatment facilities are required at the slaughterhouse site.</p> <p>It has been communicated to the Consultant that EBRD will be obtaining a contractual commitment (as part of the loan agreement) from the Municipality to undertake the pre-treatment plant so that the pre-treatment plant will not be part of the PIP.</p>
Other associated facilities	<p>No access road will be required as there is already a road immediately adjacent to the west of the boundaries of the WWTP site.</p>
Status of EIA approval process/EIA requirement for the new WWTP	<p>Turkish national legislation, the Bylaw on Environmental Impact Assessment, classifies projects into two categories: Annex-1 projects, which are subject to a full EIA, and Annex-2 projects, which require a screening and scoping process.</p> <p>For wastewater treatment plants, those with a capacity greater than 50,000 m³/day are subject to a full EIA, while those with a capacity over 30,000 m³/day are subject to screening and scoping, requiring the preparation of a Project Introduction File (PIF). However, there is a provisional article stating that projects for which investment decisions were made before 1993 are exempt from the Bylaw on EIA.</p> <p>During the inception period, Osmaniye Municipality provided a letter from the Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC), stating that the project is exempt from the national Bylaw on Environmental Impact Assessment. However, this exemption letter was issued for the existing WWTP during the renewal of its Environmental Permit.</p> <p>As a result, Osmaniye Municipality requested a clarification from Ministry of Environment, Urbanization and Climate Change (PDoEUCC) as to whether the exemption letter is still valid and received a letter confirming that the proposed WWTP project is exempted from the national Bylaw on Environmental Impact Assessment. In summary, the letter states that (see Annex 7 for the full letter):</p> <p>The project is exempted from the Environmental Impact Assessment (EIA) Regulation due to its approval and commencement dates, as well as previous exemptions under earlier regulations. Specifically:</p> <ol style="list-style-type: none"> 1) The preliminary project of the wastewater treatment plant was approved in 1987, before the cut-off date of 07.02.1993, under the repealed EIA Regulation. 2) According to the provisions of the old EIA Regulation, projects approved before this date were exempt from the EIA requirement if they complied with environmental laws and other regulations. 3) The project was included in the public investment program before 23.06.1997, and the first phase was commissioned in 2003.

Item (PIP)	Activities and footprint
	<p>4) Furthermore, under the updated EIA Regulation (Official Gazette No. 31907, 29.07.2022), projects that had commenced operation before 29.05.2013 and were included in the public investment program before 23.06.1997 are also exempt from the EIA requirement.</p> <p>5) Thus, the second phase and the planned upgrades to the existing plant, which have been included in the long-standing approval and investment plans, fall outside the scope of the EIA Regulation and are exempt from its provisions. It should be noted that the Municipality requested this letter with the following request: ". The facility, which has reached a capacity of 70,000 m³, has become insufficient due to the rapid population increase in the city caused by refugees from the war in Syria. As a result, it is planned to commission the second phase of the project and upgrade the existing treatment technology....."</p>
Construction and operation permit	<p>Prior to construction activities, Osmaniye Municipality will apply for the construction permit and building permit. Prior to start of operation of the new WWTP, the Municipality will apply to Provincial Directorate of Environment, Urbanization, and Climate Change for a Temporary Activity Certificate which is valid for 1 year. This certificate is a prerequisite for obtaining the Environmental Permit. Within this 1-year period, the Municipality will complete all procedures for obtaining the Environmental Permit.</p>
Health protection buffer zone requirement	<p>According to Turkish regulations, a health protection buffer zone (Sağlık Koruma Bandı) may be required for certain facilities emitting pollutants such as emissions, odours, or noise.</p> <p>The Osmaniye WWTP serves a population equivalent of 50,000 or more and includes an anaerobic digestion unit and two biogas tanks with a volume of 1,500m³ each. The WWTP therefore qualifies as a Second-Class facility as per Turkish legislation and is subject to a local risk assessment. Therefore, as per the legal requirement, the project needs to undergo a local risk assessment.</p> <p>The risk assessment is typically carried out by the facility in collaboration with environmental and public health experts. The findings are then submitted to the competent authority (Municipality if the project is within the municipal borders), which evaluates the assessment and issues a conclusion regarding buffer zone requirements. In addition to informing whether a safety buffer zone is deemed necessary, the risk assessment also has the purpose to inform emergency planning for the AD/biogas facility operations.</p> <p>The Consultant has informed Osmaniye Municipality about the above risk assessment requirement relating to the AD facility.</p> <p>The risk assessment has been completed by the Provincial Directorate of Health and it has been concluded that it is deemed necessary to have a buffer zone of 55 meters ± 25%. The buffer zone needs to be established as 55 meters ± 25% inward from the property boundaries of the WWTP site, with the boundary being the existing fence (please refer to Annex 14 for the official letter about the buffer zone requirement decision).</p> <p>Considering the minimum size of the buffer zone, which is 41.25 meters (75% of 55 meters), the available land for the construction of the new WWTP has been reduced from approximately 10.5 to approximately 5 ha. This area is considered sufficient for the construction of the new WWTP.</p> <p>No information with regards to emergency planning for the AD/biogas facility operations have been made available as part of the buffer zone requirement decision.</p>

Item (PIP)	Activities and footprint
	<p>Based on the information currently available regarding the planned biogas usage and storage volumes at the Osmaniye WWTP, it has been concluded that the Directive 2012/18/EU on the control of major-accident hazards involving dangerous substances (Seveso Directive²) does not apply to this project. Hence, establishing specific land-use planning requirements/policies pertaining to hazardous facilities is not required as per EU requirements.</p>
Dismantling of existing WWTP and other components	<p>The buffer zone requirement for the new WWTP has reduced the available land for the construction of the new WWTP from approx. 10.5 ha to approx. 5 ha. This area is considered sufficient for the construction of the new WWTP, however would require the demolition of the existing WWTP.</p> <p>Construction of the new WWTP should be scheduled so that the existing WWTP continues to treat wastewater until the existing works can be eventually replaced by the new works. This is considered feasible given that the existing WWTP components are located only in the southern and western parts of the available land. Construction of the new WWTP must thus be scheduled in phases and planned together with demolition of the existing works, to ensure that the treatment plant can continue to treat wastewater during the construction stage. Hence, a construction strategy has been developed to clarify how the new works will be constructed while the existing works are demolished.</p> <p>The WWTP Design-Build Employer's Requirements should include a requirement to maintain wastewater treatment throughout the construction duration of the new works which is also reflected in the separate FS report.</p> <p>In addition to this, existing discharge pipe as well as the greenhouse and animal shelter within the WWTP site will be demolished</p>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012L0018>

APPENDIX 2: STAKEHOLDER ENGAGEMENT LOG

Osmaniye Municipality 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

APPENDIX 3: SUMMARY NOTES OF FOCUS GROUP DISCUSSIONS

FDG Summary 1 – Women from Yunus Emre Neighbourhood

Participants

The focus group consisted of 10 women from both low-income and middle-income households and varying ages, ranging from 17-65. One of the participating women was Syrian. All participating women live in the Yunus Emre Neighbourhood (see map at end of this Appendix). Three of them reside in houses close to the WWTP, while the rest live in other parts of the neighbourhood.

Characteristics of neighbourhood

In their neighbourhoods, participants describe the income sources as primarily related to agriculture and livestock, with many families planting okra and having olives and vineyards. They mention that the general population in the area lives off minimum wages or middle income. In general, the income level is described as insufficient, leading to many families living in poverty. Most participants agree that there are many poor families in the area, and some families that receive support from social assistance. It was also reported that there are families whose children also must work to make ends meet. Additionally, they note that there are disabled individuals in the community, with a rough estimate of about five percent of the population being disabled.

Most participants shared that there are no recreational areas around the WWTP. A few participants indicated that there are parks near the WWTP, but these are not used.

Current experiences with access to wastewater services (and access to water services)

All participants reported that they are connected to the municipal water network. Most participants were also connected to the municipal sewage system, however a few also used septic tanks.

The current experiences with the existing water supply and wastewater services include several challenges. There is a frequent low water supply and participants indicated that water is cut – sometimes for up to a week. Many participants noted that sewage drains are often clogged, leading to unpleasant smells entering their homes, with instances of wastewater coming back from toilets. Streets are also reported to smell due to wastewater. Participants with septic tanks reported that they are often full during the winter, making emptying them a problem.

To deal with these challenges, participants mentioned various services and methods they use to obtain and dispose of water. They drink ready-made water or sometimes must go to a fountain outside to fetch water. Participants expressed dissatisfaction with their experiences when calling the municipality for help in connection with water and wastewater issues. They reported that despite making many complaints, no solutions were provided, and they felt ignored. One participant mentioned that when they call, they are often redirected to the Mukhtar, but they believe that the Mukhtar has no power to resolve the issues, as it ultimately goes back to the Municipality. When the Municipality does get back to them based on their complaints, participants shared similar opinions that responses or the solutions provided are not sufficient to resolve the issues.

Concerns related to wastewater

The women raised several concerns and associated consequences related to wastewater, including:

1. **Odour:** Participants reported that the current wastewater treatment facility emits a bad smell, sometimes so bad that is difficult to breathe and affects their ability to spend time outside. The smell from the WWTP is reportedly the worst in the summer, especially around July and August.
2. **Floodings:** Participants expressed that there are often overflows and flooding from the pipeline, which causes mixing of wastewater into local waterbodies (e.g., Hamis) and floodings into agricultural

land. Overflows are especially bad during rainy weather because the current pipes do not have adequate capacity for the additional water flow.

3. **Health Issues:** Many participants reported health problems such as asthma, skin rashes, and allergies, which they believe are caused directly or indirectly by wastewater issues. They expressed concerns that wastewater is mixed into drinking water and concerns over wastewater flowing into local streams and rivers, which has led to a decline in the quality of water, affecting both humans, livestock and local wildlife. Concerns were expressed in relation to the consumption of fish from the rivers. women also reported that children play in contaminated streams/water bodies, which may pose health risks. The women reported that it is primarily their responsibility to care for those who fall sick or are ill within the household.
4. **Insects and Pests:** The presence of flies and mosquitoes has increased, causing discomfort and health issues. There are also reports of sewer rats coming from waste drains, which adds to the concerns about hygiene and safety.

Opinions of construction of new WWTP

The opinions regarding the construction of a new wastewater treatment facility are generally positive among the participating women. They believe that the new facility will have beneficial effects, such as removing odour issues, improving the water quality in the river and improve overall living conditions. Participants expressed that they hope the fauna will be less impacted as a result of a new facility, which will hopefully lead to ability to fish in the river again. A decrease in flies and insects is also foreseen to be a benefit from the construction of a new WWTP.

Most participants indicated that they do not have concerns about the construction or operation of the facility, stating that they would be happy as long as the facility is built. It was noted that many people in the area are skilled in construction work, and there was a general agreement among participants that local people would be interested in employment opportunities related to the construction phase of the Project. It was indicated that such employment opportunities would be received as positive and beneficial to the local community.

The women unanimously expressed no concerns regarding potential sexual harassment, abuse or GBVH in connection with the construction or operation of a new WWTP. In terms of general security and safety, one person did raise concerns about additional vehicles in the area, as roads are already in poor condition and the additional traffic would further deteriorate them. The participant also expressed concern about having unfamiliar individuals in the neighbourhood. However, most of the women participants shared that there are already foreign workers in the area and that there are no concerns or issues related to their presence.

Overall, the sentiment is that the new wastewater treatment facility is seen as a necessary improvement for health and safety in the community.

Currently, participants feel that they are not adequately informed about water and wastewater activities by the municipality. Most participants expressed a lack of awareness regarding these activities. Moving forward, they wish to receive more information and be better informed. They suggested that the Municipality should provide updates and information through various channels such as public meetings, newsletters, social media, and local newspapers. Participants emphasized the importance of transparent and clear communication to keep them informed about ongoing and planned water and wastewater activities.

FDG Summary 2 – Men from Yunus Emre Neighbourhood

Participants

The focus group consisted of 12 men from both low-income and middle-income households. The participants were of varying ages, ranging from 36-80. Two participants receive pensions as disabled, and one receives social support. All participating men reside in Yunus Emre Neighbourhood (see map at

end of this Appendix). One participant resides in a house near the WWTP and is engaged in livestock farming. The others live in different parts of the neighbourhood, at a greater distance from the WWTP.

Characteristics of neighbourhood

The participants described the Yunus Emre as neighbourhood facing economic hardship, with many residents living on minimum wage. It was also mentioned that there is a high number of individuals relying on social assistance from the state. Additionally, the neighbourhood has many immigrants/refugees and according to the participants there is also a notable presence of other vulnerable groups, including individuals with disabilities. Participants estimated that around 5-10% of the population are disabled.

The participants in the focus group discussion highlighted that most people in the neighbourhood are labourers, with limited access to land for agriculture. Only a few participants cultivate land themselves, primarily crops such as okra and other vegetables. It was indicated that most residents in Yunus Emre do not own land and will often have to rent land if they wish to cultivate.

Current experiences with wastewater access (and access to water services)

Participants reported a mixed experience with water and wastewater services. Most of them rely on a combination of municipal water supply and their own wells, especially during the summer when water scarcity occurs. They expressed significant difficulties with their water supply, noting that water is frequently cut off. Additionally, it was expressed by multiple participants that the sewerage system is often clogged, leading to unpleasant odours and overflow issues.

Many participants mentioned that the smell from the sewerage is particularly bothersome, especially during humid weather or when it rains. They also reported issues with flies, rats and cockroaches, which they attributed to the poor state of the sewer system. Complaints about the wastewater treatment facility indicated that it is not functioning effectively, with many believing it does not have proper treatment facilities. Some participants also noted that the WWTP operates for only a very limited time each day, allegedly to save money.

When faced with these challenges, participants typically seek assistance from the municipality or the Mukhtar, but they expressed frustration over the lack of effective responses to their complaints. There was a general wish for better communication and information regarding wastewater management and expressed a willingness to engage in discussions about improvements.

In addition to the Wastewater Treatment Plant (WWTP), the participants identified nearby slaughterhouses and disposal of animal waste to be significant sources of water pollution and odour issues. Many participants agreed that disposal of animal waste should be fined.

Concerns related to wastewater

Primary concerns related to wastewater and water quality in the area according to the participants:

1. **Odour Issues:** Many participants indicated that the odour from the WWTP and wastewater affects their daily lives, making it difficult to spend time outdoors or engage in activities such as washing and drying clothes. Odour issues are particularly strong in places close to the WWTP and around the slaughterhouse, especially in the Yunus Emre neighbourhood. Participants noted that the smell is very high at night, particularly when it starts to get dark. The most intense odour is experienced in the summer period, with the heat starting in May and lasting until November. Additionally, the smell is also intensified during rainy weather. The most affected locations include Nohuttupe and Yunus Emre, where residents often cannot open their windows due to the intensity of the odour. The group of participants estimated that 80% of the neighbourhood is affected by these odours.
2. **Floodings:** There were reports of flooding caused by the bad condition of the pipeline, which is especially bad during the rainy season. Flooding is reported to be especially bad near and around Hamis Creek. It was noted by one participant that Syrians have built houses near the stream bed. Many also stated that the Ceyhan River is contaminated through Hamis, which is flooded with wastewater.

3. **Pests:** Participants expressed concerns related to pests in relation to wastewater. They shared that there are many problems with flies and cockroaches. Issues with rats coming from the sewers were also emphasized by multiple participants. It was furthermore indicated that the current wastewater situation has led to the emergence of a new/different species of fly, which is described as being particularly bothersome due to its painful bites.
4. **Health Concerns:** The health status of the community is a significant concern, with many participants reporting frequent illnesses such as fungal infections, allergies, and asthma, which they attribute to the poor wastewater management and the associated odours. Children are particularly vulnerable, with reports of them getting sick after exposure to contaminated river water. The poorly treated wastewater also raises fears about the contamination of vegetables and plants that are watered with river water, consumption of fish from the river and potential health impacts on livestock that drink the river water. All participating men were of the belief that it is the responsibility of women to care for sick family members.

Opinions on construction of new WWTP

All participants expressed that they do not expect any negative effects from the construction and operation of the new WWTP. In particular, participants anticipated positive effects from the new WWTP, particularly in reducing unpleasant odours and improving the overall environment. They mentioned that the facility could help clean local water bodies, which would benefit both the community and the environment.

Furthermore, participants indicated that they have no worries regarding health and security risks associated with the WWTP. They believe that the workers coming to the area are there to earn a living and do not pose any threats. It was also unanimously agreed that construction and/or operation of a new WWTP facility will not give rise to any aspects of sexual abuse, harassment or GBVH.

There was a consensus that the construction of the new WWTP could create local employment opportunities, as many people in the area have skills related to construction and operation.

Most participants stated that they do not receive sufficient information about the current WWTP activities. They expressed a desire for better communication, suggesting that information could be shared through community meetings or via the Mukhtar. Participants unanimously agreed that they want more detailed information about the new WWTP and its operations. They expressed a strong desire for the municipality to engage with them and keep them informed.

FDG Summary 3 – Farmers

Participants

The focus group consisted of 12 farmers, 11 men and 1 woman, from villages near the WWTP, such as Nohuttepe, Kimitli, and Yenikoy (see map at end of this Appendix). Participants were from both low-income and middle-income households, with ages ranging from 35-66. All participants irrigate with water from the Ceyhan River and are members of the local irrigation unions.

Key pollution sources:

In addition to the Wastewater Treatment Plant (WWTP), the following sources are reported to be causing pollution:

1. Animal faeces being poured into the water
2. Sewage from Nohuttepe
3. Water and filth from slaughterhouses discharged into the Ceyhan River
4. Pollution from the Hamis River
5. Direct sewage connections from slaughterhouses or livestock facilities to the river
6. Local villagers laying pipes to dispose of sewage directly to the Hamis Creek

7. An ABC detergent factory whose water flows to Hamis Creek
8. Cevdediyi Refugee Camp

Key issues and concerns raised about effects of poorly treated effluent and water quality:

Odour: A strong and persistent odour is reported, particularly in the communities along or close to the river, and it is especially bad during the summer months when water levels are low. The smell affects the quality of life, making it difficult for residents to open windows or invite guests. This odour starts in April and lasts until the weather gets colder, significantly impacting the residents of Nohuttepe. Villagers in Nohuttepe are forced to keep their doors and windows closed due to the smell, and although there are efforts to spray the village to cope with the situation, it remains a challenge. Additionally, the villages of Kirmitli (on the side facing Nohuttepe, approximately 5 km from the discharge point) and Yenikov (approximately 2.5 km from the discharge point) have also reported odour issues. The odour is also experienced in the Yunus Emre neighbourhood where the WWTP is located (see map at end of this Annex).

Health/Diseases: Residents experience various health issues, including allergies and skin diseases exacerbated by the polluted water. There are reports of increased cases of diarrhoea and other illnesses during the summer months. Children who swim in the river or come into contact with the water often fall ill. There are concerns about the health effects of consuming contaminated vegetables and fruits, as well as fish from the river. Elderly individuals with asthma also have difficulty due to the odour and the pollution.

Insects: The presence of new insect species, particularly a type of fly referred to as "Mucur" has increased, causing allergic reactions and painful bites that leads to swelling and fever. The mosquito population has also surged, making it difficult for residents to work outdoors. Additionally, the increase in mosquitoes is reported to cause sleep disturbances in the affected villages.

Agriculture/Livestock: Farmers have noted a decrease in crop yields and an increase in fungal diseases in crops due to the polluted irrigation water. Livestock are also affected as they drink contaminated water, leading to health issues such as fungal infections on their legs. The irrigation canals are polluted and filled with algae, and the water quality has deteriorated, impacting overall agricultural productivity.

Fish/Wildlife: The pollution has led to a decline in fish populations and changes in the taste of fish, causing health concerns for those who consume them. Wildlife, including bird species and plants in the area, has also diminished, with reports of otters and certain butterfly species no longer being present. The acidic water is harming the roots of trees and surrounding vegetation.

Opinions related to the construction of a new WWTP

The farmers suggested the following benefits regarding the construction of a new WWTP include:

1. **Environmental Improvement:** A new WWTP and improved treatment facilities are expected to clean the riverbed, improving its appearance and conditions for fauna and flora.
2. **Healthier Ecosystem:** The water quality in the bird sanctuary will be enhanced, leading to healthier plant yields and overall improvement in nature.
3. **Reduction of Odour:** The new facility is anticipated to eliminate many of the current odour issues reported by nearby communities, improving the quality of life for nearby residents.
4. **Resumption of Fishing:** With cleaner water, fishing activities can resume in the region.
5. **Economic Opportunities:** There were mixed views on potential employment opportunities as a result of the construction. It was shared that many of the younger people in the nearby villages work outside the region, however, some people who are skilled in construction do still remain. Potential increased tourism as a result of the better environmental conditions along the riverside, suggested to be of benefit to both farmers and local residents. The farmers believes that a new WWTP may restore agricultural productivity and crop yield.

However, the farmers also expressed concerns that the Municipality may not properly operate the new facility and that inadequate maintenance could lead to continued pollution, including odour and health impacts. While there are no immediate health and safety concerns, the community remains cautious about potential risks associated with its construction and operation.

It was confirmed by all participants that there are farmers who use water from downstream of the discharge point to irrigate, as well as from other water bodies, for example the Hamis Creek. This water is perceived to be polluted both due to inefficient treatment of the effluent and due to floodings and overflows from the pipelines that causes waterbodies to be contaminated by wastewater.

Opinions about information/stakeholder engagement

The farmers expressed significant dissatisfaction with the current communication regarding the operation of the Wastewater Treatment Plant (WWTP). They reported a lack of information about the facility's activities, such as the cleaning schedule for the sludge beds, and they believe the plant is not functioning effectively. This has left them feeling uninformed about the facility's operations, leading to a strong desire for more detailed information. They emphasized the need for improved communication and suggested organizing meetings to keep them updated on both the existing and new WWTP operations.

The farmers are open to receiving information through various channels and indicated their willingness to attend meetings and seminars. They also expressed interest in visual presentations and tours of the facility. Additionally, they proposed gathering women for dedicated information sessions and highlighted the potential benefits of using social media for communication. They would like to ensure that mukhtars' offices and irrigation unions are informed and prefer that explanations are provided clearly. Furthermore, they welcomed the idea of using posters and online information to disseminate details about the treatment processes.

Map indicating locations with odour issues as reported during the three FGDs



Figure 0-1: Map of area around Osmaniye WWTP (marked in red). The discharge pipeline and discharge point are indicated in yellow. Nearby villages where odour problems have been reported by residents are indicated with location pins; Nohuttepe in blue, Yenikoy in green, and Kirmitli in white. The Yunus Emre neighbourhood, where concerns related to odours have also been raised by residents, is outlined in green.