

Project Feasibility Assessment Sustainable Infrastructure Group - Malatya Water and Wastewater Network

Stakeholder Engagement Plan Report

Reference:

1 | May, 2026



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List of Abbreviations

AFAD	Disaster and Emergency Management Presidency of Türkiye
AoI	Area of Influence
DSİ	The State Hydraulic Works of Türkiye
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIRR	Economic Internal Rate of Return
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
EU	European Union
FS	Feasibility Study
GBVH	Gender-Based Violence and Harassment
ILBANK	Bank of Provinces Incorporated of Türkiye
MASKİ	Malatya Water and Sewerage Authority
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
SMS	Short Message Service
TOKİ	Housing Development Administration of Türkiye
TRBİ	Malatya, Elazığ, Bingöl, Tunceli
TurkStat	Türkiye Statistical Institute

1. Introduction

The European Bank for Reconstruction and Development (EBRD, the Bank) is considering financing the Republic of Türkiye for the “Malatya Water, Wastewater and Stormwater Network” project. This funding is intended to support the reconstruction and rehabilitation of water and wastewater infrastructure in Malatya, which sustained significant damage during the devastating earthquakes of February 2023. Through this investment, the Bank aims to re-establish essential services in the region while promoting long-term resilience and sustainability of its infrastructure.

This Stakeholder Engagement Plan (SEP) is prepared under the feasibility assessment of the project which also covers evaluation of project’s compliance with the Bank’s Environmental and Social Performance Requirements. This SEP needs to be finalized and be updated periodically to reflect any changes, including the inclusion of newly identified stakeholders as the Project progresses.

2. Description and Context of Proposed Project

This project aims to strengthen urban infrastructure services in full compliance with national and international regulations. It also includes plans to enhance MASKI’s institutional capacity to manage the impacts of earthquakes more effectively.

As part of the project, new drinking water systems will be constructed to reduce losses and monitor leakages, ensuring that residents have access to safe, high-quality water. In addition, the development of wastewater infrastructure will help prevent environmental and health risks while achieving full compliance with national and international environmental standards.

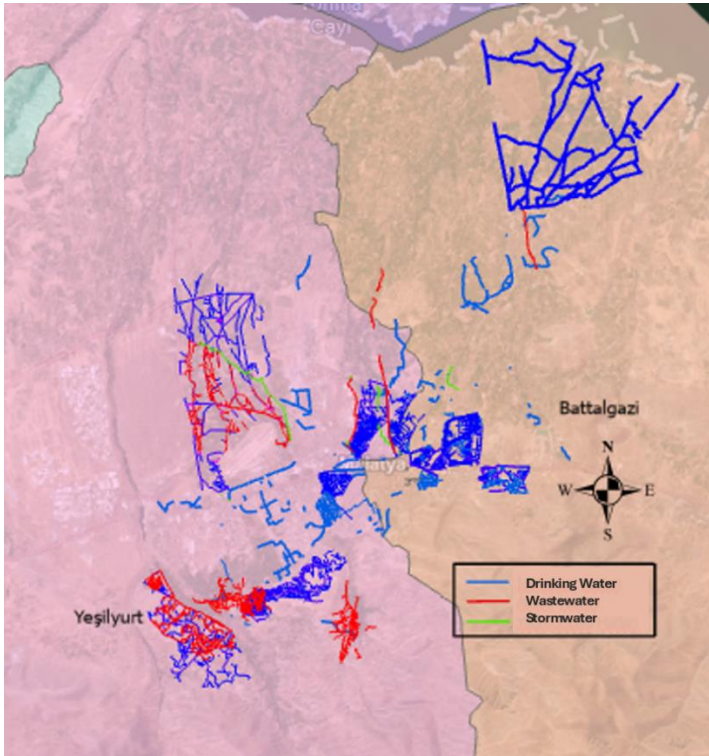


Figure 1: Water and Wastewater System

3. Objective/ Description of Stakeholder Engagement Plan

The main objective of this SEP for Malatya Water, Wastewater and Stormwater Network Project is to outline a structured approach to engaging with all stakeholders, ensuring transparency, inclusivity, and meaningful participation throughout the project lifecycle. The SEP seeks to identify and address the concerns and expectations of individuals, groups, and organizations potentially affected by or interested in the project, including Project-Affected Persons (PAPs), women, vulnerable groups, and other key stakeholders. Additionally, the SEP ensures compliance with EBRD's Environmental and Social Policy (ESP) and its Performance Requirements (PRs), particularly PR10 on Information Disclosure and Stakeholder Engagement, by establishing mechanisms for timely information sharing, grievance management, and ongoing consultation. Through this, the SEP aims to mitigate risks, enhance project outcomes, and promote sustainable development aligned with stakeholder needs and priorities.

The SEP will guide ILBANK, MASKI and contractors towards implementing a structured stakeholder consultation and engagement during all stages of the Project implementation.

4. Identification of Stakeholders and Communication Methods

The table below outlines the primary stakeholders identified during the Feasibility Study, along with their respective interests in the Project. As highlighted in the Introduction, the SEP needs to be finalized and be updated periodically to reflect any changes, including the inclusion of newly identified stakeholders as the Project progresses.

Table 1: Key Stakeholders and Their Interests

Key Stakeholders	Specific Interests in / Relevance for Project
National Governmental Organizations	
• ILBANK • Ministry of Environment Urbanization and Climate Change • 9th Regional Directorate of State Hydraulic Works • Disaster and Emergency Management Presidency - AFAD • 8th Regional Directorate of Highways • Ministry of Culture and Tourism	• Project financing; technical oversight; procurement and disbursement monitoring. • Land-use planning; permitting; national policy compliance. • Basin and water resource management; discharge permits; flood control coordination. • Disaster risk input; emergency planning; temporary housing coordination. • Coordination on road closures, traffic safety, and integration with highway networks. • Heritage site protection; review of construction impacts on cultural assets.
Local Governmental Organizations	
• Governorship of Malatya • Provincial Directorate of Environment Urbanization and Climate Change • Regional Directorate of ILBANK • Malatya Provincial Directorate of Agriculture and Forestry • Fırat EDAŞ Electricity Distribution Company • Malatya Provincial Disaster and Emergency Management	• Provincial-level coordination; inter-agency facilitation and security oversight • Oversight of environmental compliance; supervision of waste, noise, and emissions management; permitting and reporting responsibilities under national legislation. • Local-level project supervision; liaison with national ILBANK. • Land classification; agricultural land use control; coordination on forested areas

Key Stakeholders	Specific Interests in / Relevance for Project
- Provincial Directorate of Culture and Tourism - Sivas Cultural Heritage Preservation Regional Board Directorate	- Relocation of electricity lines; infrastructure coordination during construction. - Local-level emergency preparedness; container housing operations; risk assessment. - Oversight of locally registered heritage assets; cultural impact review. - Decision-making on cultural property impacts and mitigation requirements
Malatya Metropolitan Municipality	
- Mayor - The Municipal Council, Press and Public Relations Department - City Council - Various Departments	- Strategic oversight; public accountability; alignment with municipal development priorities. - Approval authority for budgets, land use decisions, and major infrastructure projects. - Coordination of public announcements and community outreach related to the project. Representation of local interests; facilitation of citizen participation and feedback. - Technical implementation support; utility coordination; supervision of construction impacts on urban services and traffic
Private Companies	
- Firat EDAŞ Electricity Distribution Company - Telecommunication and Internet Supplier Companies: Turktelecom, Turkcell, Vodafone, Superonline, Türksat Kablonet	- Coordination on relocation or protection of electricity lines; minimizing service disruption during construction. - Coordination for telecom infrastructure crossings; ensuring continuity of communication services and early notification for disruptions
Non-Governmental Organizations	
- Chamber of Architects Malatya Representative (TMMOB) - Malatya Chamber of Civil Engineers - Malatya Bar Association (including the Environment Commission)	- Review of design standards, planning principles, and potential impacts on built environment. - Technical assessment of infrastructure works; input on construction quality and safety. - Legal oversight on environmental and social rights; feedback on land access, resettlement, and community grievances.
Headmen/Local Communities/Residents	
113 neighbourhoods in total from Yeşilyurt and Battalgazi districts - Residents, businesses and organizations	- Dissemination of project-related information; relaying local feedback and concerns; facilitating community participation. - Access to improved wastewater services; protection from construction-related disruptions (e.g., noise, traffic, access).
- Neighbourhood headmen - Temporary container housing manager	- Key actors for disseminating project information and collecting community feedback. - Coordination with authorities to ensure continuity of basic services for displaced populations.
Vulnerable persons/ groups	Require tailored support measures, inclusive consultation, and access to complaint mechanisms.
Media (local and national)	
- Malatya Kent Newspaper - Yeni Doğanşehir Newspaper - Bakış Newspaper - Busabah Newspaper - Malatya Hakimiyet Newspaper - Yeni Malatya Newspaper	Dissemination of project-related updates, announcements, and emergency notifications; shaping public perception and promoting transparency.

Key Stakeholders	Specific Interests in / Relevance for Project
• www.haber44.com • 98.3 Radio Zafer • 98.9 Dost FM • Radio Süper 44 • Malatya Pencere Gazete TV • Malatya Zer TV • TVM Malatya TV • Er TV • Social media, X, linked-in, facebook, Instagram of Municipality and MASKI	

Vulnerable individuals or groups are those who may experience greater adverse impacts from project activities due to specific characteristics, such as gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youth, and the elderly), physical or mental disabilities, literacy levels, political views, or social standing.

These groups may also include people in precarious situations, such as those living below the poverty line, landless individuals, single-headed households, communities reliant on natural resources, migrant workers, refugees, internally displaced persons, or others displaced who may lack protection under national legislation or international law.

The identified vulnerable groups and the potential impacts they may face under the project are outlined below:

- Children (about 125,000)¹:
 - During construction, children may face risks related to community health and safety, as identified in the Environmental and Social Assessment (ESA) report.
- People over 65 years of age (about 50,000)²:
 - Construction actions may interfere with daily routines and access to essential services, potentially causing stress or inconvenience.
- People with chronic illnesses or in need of special care (about 605)³:
 - Disruptions caused by construction may impede access to healthcare and other necessary services, exacerbating health conditions or discomfort.
- Disabled people (about 605)⁴:
 - Construction actions could obstruct accessibility routes or facilities, limiting mobility and increasing challenges for disabled individuals.
- Refugees/Immigrants (about 20,000)⁵:
 - Language barriers and lack of awareness may result in safety risks and hinder access to critical information and services.

¹ TURKSTAT. (2024). Address Based Population Registration System Results, 2024. Retrieved from <https://data.tuik.gov.tr/Kategori/GetKategori?p=Nufus-ve-Demografi-109>

² TURKSTAT. (2024). Address Based Population Registration System Results, 2024. Retrieved from <https://data.tuik.gov.tr/Kategori/GetKategori?p=Nufus-ve-Demografi-109>

³ Headmen Survey. (2025). Headmen Survey Data

⁴ Headmen Survey. (2025). Headmen Survey Data

⁵ Headmen Survey. (2025). Headmen Survey Data

- People Living at Temporary Container Housing (about 65,000)⁶:
 - Disruption in services, such as access to water or temporary blockage of sewage systems

Table 2: Interested and Affected Stakeholders

Stakeholder Groups	Stakeholder Type		
	Cause of Impact/interest	Affected Party	Interested Party
Project Owner			
• ILBANK • MASKI • Contractors and Employees	Project development, implementation and employment	X	
Municipalities			
• Malatya Metropolitan Municipality of	Project development, implementation and employment	X	
Neighbourhood			
• Directly affected 113 neighbourhoods • Temporary container housing areas in directly affected neighbourhoods	Possible disturbances during the construction phase may include noise and dust generation, increased traffic, and temporary access limitations.	X	
Private Companies			
• Fırat EDAŞ Electricity Distribution Company • Telecommunication and Internet Supplier Companies: Turktelecom, Turkcell, Vodafone, Superonline, Türksat Kablonet	Possible disturbances during the construction phase	X	
• Businesses within the project impact area	Possible disturbances during the construction phase may include noise and dust generation, increased traffic, and temporary access limitations.	X	
Vulnerable/Disadvantaged Individuals or Groups			
• Children • People over 65 years of age • People with chronic illnesses or in need of special care • Disabled people • Refugees/Immigrants • People Living in Temporary Container Housing • People Living in Poverty or Facing Economic Hardship	Possible disturbances during the construction phase may include noise and dust generation, increased traffic, and temporary access limitations.	X	
Administrations of the Sensitive Receptors Close to the Construction Area			

⁶ AFAD. (2024). *Temporary shelter site population statistics in Malatya*

Stakeholder Groups	Stakeholder Type		
	Cause of Impact/interest	Affected Party	Interested Party
- Schools - Hospitals	Institutions requiring heightened attention to project impacts due to their proximity to the project site	X	
Media			
National and local media	Informing the public		X
Lender			
European Bank for Reconstruction and Development (EBRD)	Project Development, Implementation Supervision		X
Government / Authorities			
- Governorship of Malatya - Malatya Provincial Directorate of ILBANK - Malatya City Health Authority - Directorate 9th General for State Hydraulic Works - Malatya Provincial Directorate of Environment, Urbanization and Climate Change - Malatya Directorate of Culture and Tourism - Sivas Cultural Heritage Preservation Regional Board Directorate - Malatya Provincial Directorate of National Education	The project's connection with healthcare, environmental, and social organizations throughout the construction and operational stages.		X
NGO			
NGOs with themes such as environmental protection, public health, and citizenship	The environmental and social risks and impacts outlined in the ESA report for this project, along with the overall environmental and social performance during its implementation.		X

5. Stakeholder Engagement Program

5.1 Summary of Stakeholder Engagement Done During Project Preparation

Four site visits were conducted to support project planning and gather additional data. The **first site visit** on **24 October 2024** included a Kick-Off meeting where the project scope and objectives were introduced. Discussions focused on the city's current water, wastewater and stormwater systems, the proposed methodology, and data requirements. Following the meeting, relevant project sites, including ongoing construction areas and the existing wastewater treatment plant were visited.

The **second site visit** on **6 and 7 November 2024** involved further engagement with municipal departments and site inspections. Meetings focused on environmental, social, and operational issues, while site visits covered key project locations, including the existing wastewater treatment plant, proposed facility site, and critical infrastructure under construction.

As part of the second site visit, a dedicated meeting was held with relevant departments of Malatya Metropolitan Municipality and MASKI to assess institutional structures and ongoing practices, particularly regarding environmental, social, gender, and labour-related aspects. Attending departments included Wastewater Collection Systems, MASKI Human Resources, Treatment Plants of MASKI, MASKI SCADA and Alo 185 Services as well as Malatya Metropolitan Municipality units such as Muhtar Relations, Corporate Communications, Public Relations, Parks and Gardens, Services to District Municipalities, Media and Public Relations and Services for the Elderly and Disabled.

The discussions covered a range of issues including the current state of water, wastewater, and stormwater systems; infrastructure challenges such as supply interruptions, distribution losses, and the continued presence of asbestos pipes; the scope and purpose of social, gender, and labour assessments; service provision for vulnerable groups; and the municipality's long-term strategic and operational needs. Automation systems such as SCADA, plans for smart grid development, and remote meter reading were also reviewed. These consultations provided important insights into institutional capacities and informed the design of relevant environmental and social measures.



Figure 2: Meeting with Relevant Department Representatives from MASKI and Municipality during the second field visit (second day)

These visits reinforced communication with stakeholders and provided essential insights for the next phases of the project. Building on the outcomes of these initial field engagements, the project team initiated a structured stakeholder consultation phase to gather more targeted feedback. As part of the continued engagement process, activities third site visit were carried out on **11 and 12 December 2024**, focusing on communication with key stakeholders. Neighbourhood headmen and other relevant actors were invited to participate through the municipality's communication branches.

Due to low participation in the initial meetings, ARUP officials conducted the fourth field study on 15 January 2025 to coordinate with MASKI, holding a follow-up session with neighbourhood headmen. While 42 headmen were expected, approximately 30 attended. During this meeting, the project's survey tool was presented in detail via the Zoom platform, and participants were encouraged to take part. Contact details were collected, and additional input was later gathered through follow-up telephone interviews.

Engagement efforts were further extended during **June-July 2025** through remote surveys and interviews with headmen. In total, 72 headmen were consulted as part of this process, 68 responded through structured surveys, while 4 provided in-depth feedback via verbal interviews. Before the survey, headmen were briefed on the project's objectives, scope, and financing structure. They were informed that the initiative, supported by the EBRD, aims to rehabilitate the water, wastewater and stormwater networks in Malatya, which was severely damaged during the February 2023 earthquakes. The project's broader goals include not only restoring basic services but also ensuring long-term infrastructure resilience and sustainability. During the briefing, key

aspects such as the technical feasibility studies, stakeholder engagement strategies, environmental and social impact assessments, and institutional capacity needs were also presented.

The headman consultations, conducted both in December 2024 and through follow-up surveys in mid-2025, were designed as comprehensive tools to assess neighbourhood-level conditions before and after the 2023 earthquake, with particular emphasis on infrastructure, social dynamics, and vulnerable groups.

The headman surveys gathered detailed insights into the issues most frequently brought to the attention of headmen, such as infrastructure deficiencies, social assistance needs, and challenges in accessing municipal services.

The headmen who attended the meeting answered the survey prepared for the project via Google Forms⁷.



Figure 3: Photo from 1st Headman Meeting



Figure 4: Photo from 2nd Headman Meeting

Additionally, meetings were conducted with the Temporary Container Housing Manager from AFAD and local civil society organizations. Meetings were held with the temporary container housing managers from AFAD and AKOM and the temporary container housing representatives from MALET and Teknokent. The temporary container housing managers are responsible for 75 temporary accommodation areas. These activities provided valuable insights and addressed the concerns of the community.



Figure 5: Photo from Meeting of the AFAD and AKOM Temporary Container Housing Managers

The feedback and issues raised during these engagements were documented and integrated into the ongoing social impact assessment, ensuring stakeholder input contributed directly to the project's planning and implementation. The minutes of meetings and list of stakeholders contacted are given in A.1 and A.2, respectively.

⁷ <https://docs.google.com/forms/d/13hKIY0W2hZx9gD7eJJimMbGAlqgazFyUMah8JXKqcE>

5.2 Summary of Project Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement

A variety of tools will be employed to ensure effective stakeholder engagement throughout the Project's lifecycle. These methods build on existing communication mechanisms while introducing new approaches as needed for efficient and inclusive interaction. The following methods will be used for engaging with stakeholders:

- Formal and informal face-to-face meetings: These have been a primary method of consultation and will remain so throughout the Project. Stakeholders have been and will continue to be informed about meetings through telephone calls, WhatsApp messages, SMS, brochures, posters, and email. Two stakeholder consultation meetings have already been organized as part of the Project.
- Focus group meetings: These will provide a supportive setting for stakeholders to express their views and contribute to discussions, complementing negotiations throughout the Project's implementation.
- One-on-one meetings: This engagement method will ensure a more comfortable and private environment for stakeholders, especially vulnerable or disadvantaged individuals, to voice their concerns and provide input.
- Digital communication tools:
 - The ILBANK website will serve as a central platform for disseminating announcements, documents, reports, and updates related to the Project, disclosing SEP and NTS as well as information on grievance mechanisms.
 - Key documents such as the Stakeholder Engagement Plan (SEP) and Non-technical Summary (NTS) will be made available in both English and Turkish.
 - The website and social media accounts of ILBANK and MASKI will share all relevant updates and public information about the Project.
 - Additional tools such as telephone, WhatsApp, SMS, brochures, posters, and email will support broader information disclosure and announcements.
- Written materials: Informational resources, including brochures, leaflets, and posters, will be provided to stakeholders. These materials will detail the Project, its environmental and social principles, the grievance mechanism, and available stakeholder engagement tools. All written materials will be available in Turkish.
- Grievance mechanism: The mechanism will comply with the European Bank for Reconstruction and Development (EBRD) Performance Requirement 10 (PR10) to ensure all stakeholders can submit grievances or concerns. The grievance mechanism will be accessible, transparent, and responsive, allowing stakeholders to provide feedback free from retaliation at any stage of the Project. Information on how to access the grievance mechanism will be widely disseminated, and the contact details of responsible personnel will be shared through the meetings and disclosed at the ILBANK webpage (<https://www.ilbank.gov.tr/>) and MASKI webpage (<https://www.maski.gov.tr/>). Stakeholder grievances will be logged, assessed, and resolved in line with EBRD standards.
- Media promotions: Local newspapers and ILBANK's and MASKI's social media platforms will be used to share updates and promote contact information throughout the Project's duration.

All feedback, complaints or notifications received during face-to-face, online, or other meetings will be recorded, processed, and addressed through the grievance mechanism. Meetings will be scheduled in consultation with stakeholders to ensure optimal participation. Where necessary, shuttles will be arranged to facilitate stakeholder attendance, or responsible personnel will conduct meetings at stakeholders' locations to maximize accessibility and convenience.

5.3 Stakeholder Engagement Plan

During the construction phase, the primary focus will be identifying stakeholders who are most likely to be affected by construction activities and ensuring they are informed about these activities and any program changes. The goal will be to conduct tailored consultations on community health and safety, aiming to minimize risks to the lowest possible level while providing timely responses to address suggestions or resolve complaints.

Furthermore, stakeholders will be regularly updated on the progress of the project. This includes sharing information on the project's environmental and social performance, the implementation of the stakeholder engagement plan, the grievance mechanism, and the overall progress of project implementation.

Table 3: Stakeholder Engagement Plan

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsible Body
Pre-Construction	Before Construction	• Project E&S principles • Grievance mechanism • Community health and safety • Employment: local hiring and job creation • Traffic regulations • Environmental and social impacts, risks and mitigation measures • Disclosure of the Project Information • Construction Timeline and Disruption Management • Identify access needs for agricultural areas and vulnerable groups through pre-construction survey to inform mitigation planning • Disclosure of ESA report and SEP	• Formal/ informal face-to-face meetings, • Focus group meetings, • Digital communication tools, • Written materials, • Stakeholder consultation meetings • Digital communication tools, • Written materials. (The documents will be disclosed on the ILBANK's website and MASKI'S website) • Pre-construction field survey and stakeholder consultations	All stakeholders	• ILBANK PIU • MASKI • E&S Consultant • Contractor Supervision Consultant
Construction	Five (5) days before construction activities in a vicinity possible impact, whenever necessary during the construction	• Updates about the Project • Grievance mechanism • Construction Timeline and Disruption Management • Community health and safety • Employment: local hiring and job creation • Traffic regulations	• Formal/ informal face-to-face meetings, • Focus group meetings, • Digital communication tools, • Written materials, • Stakeholder consultation meetings • Digital communication tools, • Written materials. (The documents will be disclosed on the ILBANK's website and MASKI's website)	All stakeholders	• ILBANK PIU • MASKI • E&S Consultant • Contractor Supervision Consultant

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsible Body
		Environmental and social impacts, risks and mitigation measures			
Operation	Five (5) days before possible impact due to the maintenance and repair, whenever necessary during the operation Regularly throughout the operating period.	- Traffic regulations and safety - Interruptions to essential services such as electricity, water, and internet - Community health and safety - Environmental and social impacts and mitigation measures - Grievance mechanism - User Feedback and Satisfaction Monitoring - Emergency Communication Protocols	- Digital communication tools - Media promotions	All stakeholders	MASKI

5.4 Reporting Back to Stakeholders

Stakeholders will be kept informed throughout the project's development. This includes regular reporting on the project's environmental and social performance, the implementation of the Stakeholder Engagement Plan (SEP), the Grievance Mechanism, and the overall progress of project implementation.

The following are the minimum requirements for the content of minutes to be prepared after each stakeholder engagement activity or meeting:

- Location of the consultation/event.
- Date of the consultation/event.
- Details of attendees (as appropriate).
- Meeting/Event Program or Schedule, outlining what is presented and by whom.
- Meeting Minutes, including comments, questions, responses by presenters, and photos from the meeting.
- Agreed actions to be taken following the meeting.

Advance Notification for Affected Stakeholders

- The MASKI will notify the headman's offices in the impacted area at least five days in advance of any potential temporary road closures caused by construction works.
- Similarly, the MASKI will inform affected local residents about upcoming construction activities through local municipal buildings and notice platforms at least five days in advance.

The MASKI will maintain responsibility for stakeholder engagement as an ongoing process throughout the life of the project. Stakeholder logs will be regularly updated to document details of all engagement activities, ensuring transparency and accountability in all interactions with stakeholders.

6. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

6.1 Management Functions and Responsibilities

A Community Liaison Officer (CLO) or social expert will be appointed by ILBANK PIU, with the coordination and management of MASKI, to implement and manage the Stakeholder Engagement Plan (SEP) and Grievance Mechanism. The ultimate responsibility for implementing the SEP lies with ILBANK PIU supported by MASKI.

The project will be managed by ILBANK PIU with the coordination of the MASKI. The implementation and oversight of activities outlined in the SEP will be managed by the Social Expert or CLO within ILBANK PIU, with the coordination and management of MASKI.

ILBANK PIU will also handle procurement, financial management, audit support, and reporting.

6.2 Resources

ILBANK PIU, with the coordination and management of MASKI, is responsible for carrying out all stakeholder engagement activities.

7. Grievance Mechanism

The purpose of the Grievance Mechanism (GM) is to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all involved parties. The GM includes both a public grievance mechanism and a workers' grievance mechanism, providing a formal procedure for project-affected people, including communities and project workers, to raise and resolve their concerns. Grievances can signal emerging stakeholder issues, which may escalate if not promptly addressed. Timely identification and resolution of grievances help foster positive relationships between project workers, local communities, and other stakeholders.

Grievances within the Public Grievance Mechanism and Worker Grievance Mechanism will be submitted in Turkish using Turkish forms. For stakeholders who do not speak Turkish but wish to raise concerns about the environmental or social performance of the project, necessary language support will be provided promptly by the MASKI.

The structured GM ensures that grievances associated with the project are addressed through a transparent and impartial process. The public will be informed about the GM through the disclosure and consultation of the Stakeholder Engagement Plan (SEP) and through ongoing stakeholder engagement activities conducted throughout the project's lifecycle, as outlined in the SEP.

7.1 National Level Grievance Mechanisms

The intake channels for the existing national level GMs are provided below:

Presidency's Communication Centre (CIMER):

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 well-known channel for conveying their Project-related grievances and feedback directly to state authorities

CIMER Website: www.cimer.gov.tr

CIMER Call Centre: 150

CIMER Phone Number: +90 312 525 55 55

CIMER Fax Number: +90 0312 473 64 94

Address for Official Letter: Republic of Türkiye, Directorate of Communications Kızılırmak Mah. Mevlana Bulvarı No:144 ÇANKAYA/ANKARA

Mail addressed to Republic of Türkiye, Directorate of Communications

Individual applications at the community relations desks at governorates, ministries and district governorates

The Foreigners Communication Centre (YIMER)

The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

YIMER Website: www.yimer.gov.tr

YIMER Call Centre: 157

YIMER Phone Number: +90 312 5157 11 22

YIMER Fax Number: +90 0312 920 06 09

Address for Official Letter: Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA

Mail addressed to Republic of Türkiye, Directorate of Communications

Individual applications at the Republic of Türkiye General Directorate of Migration Management

7.2 EBRD Grievance Mechanisms

The European Bank for Reconstruction and Development (EBRD) has established the Independent Project Accountability Mechanism (IPAM) to address concerns and grievances related to its financed projects. IPAM

operates independently from the Bank's management and reports directly to the Board of Directors, ensuring impartiality in its processes.

Functions of IPAM:

1. **Problem Solving:** Facilitates dialogue between complainants and clients to resolve issues without attributing blame, aiming for mutually agreeable solutions.
2. **Compliance Review:** Investigates whether the EBRD has adhered to its Environmental and Social Policy and Access to Information Policy in the context of specific projects.
3. **Outreach:** Promotes accessibility to IPAM among civil society organizations and project-affected people, raising awareness of its purpose and functions.
4. **Institutional Learning:** Shares lessons learned to enhance the Bank's accountability and project performance.

Submitting a Complaint:

Individuals or organizations affected by EBRD-financed projects can submit complaints to IPAM. Complaints can be filed in any language and should include details about the project, the harm or potential harm experienced, and any prior efforts to resolve the issue.

Contact Information:

- **Email:** ipam@ebrd.com
- **Mailing Address:** Independent Project Accountability Mechanism European Bank for Reconstruction and Development Five Bank Street London E14 4BG United Kingdom

For more detailed information about IPAM and the complaint submission process, please visit the official IPAM website: <https://ebrd.com/ipam?>

7.3 MASKI Grievance Mechanism

The MASKI handles public grievances and feedback through its website and the 185 hotline. This Grievance Mechanism (GM) system is designed to receive and address grievances and requests from local citizens, aiming to provide timely and effective solutions within the MASKI for reported concerns.

The communication channels of the MASKI are as follows:

- **MASKI's Website:** <https://www.maski.gov.tr/iletisim.asp>
- **MASKI's Phone:** 0 (422) 377 74 44
- **MASKI's Whatsapp:** 0 (549) 456 44 85
- **MASKI's E-mail:** info@maski.gov.tr
- **E-mail for official mail:** maski@hs01.kep.tr
- **Address for Official Letter:** İkizce Mah. Ankara Yolu Cd. No: 39 Yeşilyurt / Malatya

These channels ensure accessibility for all stakeholders, enabling them to voice their concerns or provide feedback about the project effectively.

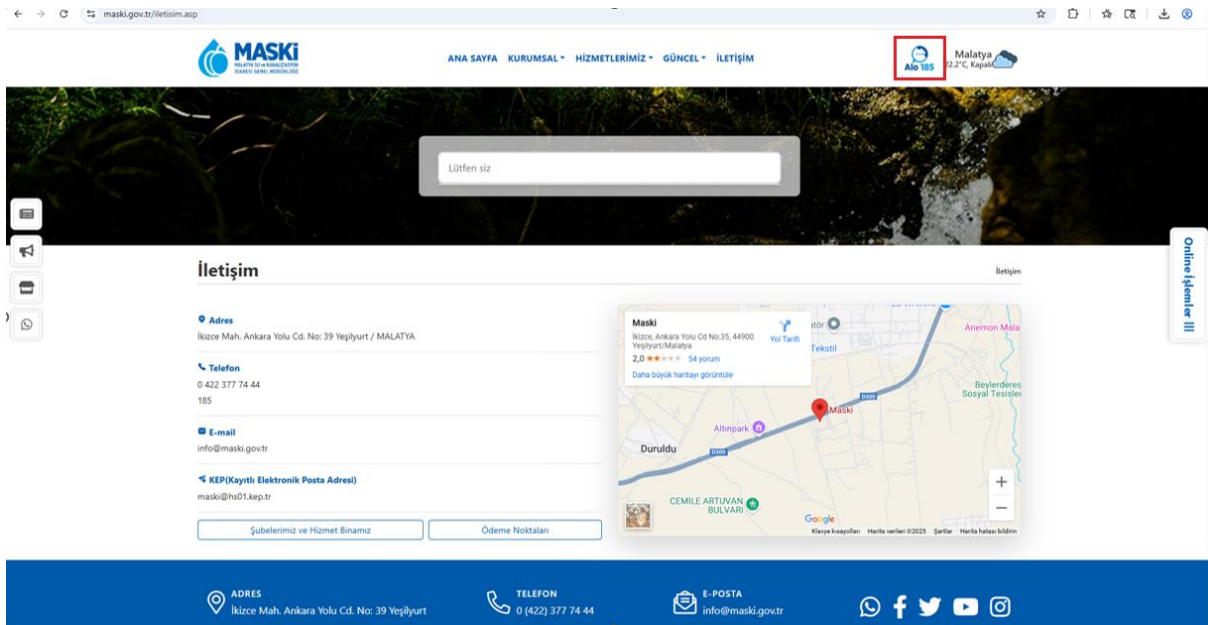


Figure 6: MASKI Web Site Grievance Mechanism

The MASKI General Directorate informs the public through Instagram, with 6,271 followers, and Twitter, with 7,666 followers. Similarly, the Malatya Metropolitan Municipality (MMM) uses Instagram, also with 52,900 followers, and Twitter, which has 49,700 followers, to engage with the public.

Submission of Complaints:

Complaints and requests can be submitted through various channels.

- If submitted through the call centre:

The complaint is automatically transferred to the 185 software system. The caller's phone number and T.C. (Turkish National ID) number are automatically recorded in the system. If the caller is already registered, the complaint details, including the subject and additional information, are directly entered into the system. The complaint is then forwarded to the relevant department based on the issue's subject matter.

- If submitted through other channels:

The complaint is forwarded directly to the relevant department. Complaints are automatically categorized and assigned based on their subject.

Assignment and Resolution:

The customer service officer assigns the complaint to the relevant unit personnel. Once the assignment is completed, the responsible team resolves the issue. The team completes forms detailing the case using the MASKI application based on the type of issue.

The customer service officer monitors the status and reviews the resolution. If necessary, the issue is reassigned to the relevant department for further action.

Informing the Complainant:

The citizen who submitted the complaint is informed of the progress and resolution via SMS, email, or phone call. Additionally, the status can be tracked through an online platform.

Upon resolution, the citizen is invited to complete a satisfaction survey. If the survey is not completed, the citizen is contacted via phone to gather feedback.

7.4 ILBANK Grievance Mechanisms

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

The communication channels of İLBANK are as follows:

- **Phone:** +90 312 508 79 79
- **E-mail:** bilgiuidb@ilbank.gov.tr
- **Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **Address for Official Letter:** İLBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara

7.5 Process Flow for the Project Level Grievance Mechanism

İLBANK Grievance Mechanisms will be used for the project. The operational flow of Grievance Mechanism for the 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.
2. **Submission of grievances and requests to İLBANK.** İLBANK includes several uptake channels for its GM.
 - a. Web page (İLBANK)
 - b. E-mail address (İLBANK)
 - c. Consultation meetings
 - d. Telephone (İLBANK)

However, stakeholders can submit grievances through various channels including National Level Grievance Mechanisms (Presidency's Communication Centre and The Foreigners Communication Centre), Malatya Municipality Grievance channels (website, email, phone) and also İLBANK's website, email, phone, and meetings.

3. All the grievances received through the above channels will be collected at the İLBANK.
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 days. In case of a complaint on GBV, SEA/SH and/or other gender related grievances, complaint data must be reported immediately.
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 10 working days. If the complaint is valid identifying and taking the required action should take place 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 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).

7.6 Right to Appeal

Applicants whose complaints cannot be resolved through the available grievance mechanisms or those whose grievances involve sensitive matters have the option to escalate their concerns to the appropriate legal authorities. These authorities include:

- Civil Courts of First Instance
- Administrative Courts
- Commercial Courts of First Instance
- Labor Courts
- The Ombudsman Institution (<https://ebasvuru.ombudsman.gov.tr/>)

The legal process related to such cases will be tracked and recorded through the Grievance Mechanism.

7.7 Grievance Log

Under the established Grievance Mechanism, all submitted grievances will be documented in the Grievance Log, with a unique reference number assigned to each entry. A sample Grievance Form can be found in Appendix-A.3 of this SEP.

The Grievance Log will serve as a tool to track the status of grievances, assess their frequency, analyse the underlying causes, and identify common or recurring issues.

7.8 Workers' Grievance Mechanism

Workers' Grievance Mechanism refers to the process for addressing complaints raised by employees working on the Project, including both direct and indirect employees. This mechanism aims to provide an effective approach for the early identification, assessment, and resolution of grievances throughout the Project's duration while ensuring that employees raising concerns are protected from any form of retaliation.

The scope of the Workers' Grievance Mechanism includes but is not limited to, issues related to occupational health and safety, working conditions, wages, conflicts with co-workers or the local community, hygiene issues in shared spaces, insufficient food provisions, and worker safety.

The Grievance Mechanism will be communicated to all Project workers through written and verbal means. Each worker will be informed about the mechanism upon hiring, and details on its operation will be readily available, such as in employee handbooks.

Recognizing the importance of confidentiality for some employees, the mechanism will allow complaints to be submitted anonymously. In such cases, responses or corrective actions will be shared publicly in designated areas within worker containers to ensure transparency while maintaining confidentiality.

The Contractor will assign a responsible person at the construction site to record grievances, whether they are submitted verbally or through grievance forms placed in designated locations. These grievances will be recorded and relayed to the Project GM officer for further action and resolution.

It is important to emphasize that Project employees retain the right to access the public grievance mechanism for matters unrelated to their employment.

To ensure timely resolution, complaints will be investigated promptly. Complaints involving immediate risks to workers' safety or livelihoods must be addressed within 24 hours, while other grievances should be resolved within seven business days. All investigations and resolutions will be meticulously documented.

The detailed procedures of the Worker Grievance Mechanism will be described in the Project-specific Labor Management Plan (LMP).

The GM Team is established with expert/technical expert and technical group manager under the PIU of ILBANK Department of International Relations includes expert/technical expert and technical group manager.

The Ethics committee (EC) is responsible for investigating all sensitive complaints⁸ referred by the GM team or by any member of ILBANK PIU staff includes a senior manager, a manager and a staff representative under the Department of International Relations of ILBANK.

The workers grievance mechanism will follow the operational flow as defined in Table 5.

Below intake channels will be available for the project workers if they would like to submit a complaint or a request to ILBANK.

Table 4: Workers' Grievance Mechanism

Grievance/ Suggestion Boxes	Grievance/Suggestion Boxes will be placed in the Department of International Relations of ILBANK and 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	etikuidb@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) <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 well-known channel for conveying their Project-related grievances and feedback directly to state authorities</i>	Webpage	www.cimer.gov.tr	
	Call Center	150	
	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 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		

The worker complaints and requests will be classified based on their severity, frequency and more importantly sensitivity. Categories of complaints, descriptions and the responsible parties are presented below:

Table 5: Workers' Grievance Category

Worker Complaints		
Category	Description	Responsible Party
Level 1	When an answer can be provided immediately and/or GM Team and Municipal/Contractor Community Engagement Officers are already working on a resolution	GM Team
Level 2	Repeated, extensive and high-profile grievances that may jeopardize the Project or pose reputational risks	GM Team Ethics Committee External Experts (when necessary)

The officer designated by the ILBANK for the Worker Grievance Mechanism will handle written complaints using the Sample Grievance Form (Appendix-A). Actions taken and resolutions provided will be documented

⁸ **Sensitive complaints** could include the following (not an exhaustive list): **1)** Sexual exploitation and/or any type of abuse by a staff member; **2)** Fraud and/or corruption by a staff member, such as involvement in bribery or misusing funds; **3)** Any action which constitutes a breach of ILBANK code of conduct including staff behaviour.

through the Grievance Closure Form (Appendix-B). This process ensures that all activities under the mechanism are recorded and fosters a transparent relationship between workers and the ILBANK.

7.9 Grievances Related to GBV/SH/SEA

To effectively address risks associated with Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV), the Grievance Mechanism (GM) will be operational before contractors mobilise. Given the sensitive nature of GBV, SEA, and SH complaints, there are inherent risks of stigmatisation, rejection, or reprisals against complainants. These factors can perpetuate a culture of silence, making survivors hesitant to report incidents directly to the project.

To ensure safe access for women and other survivors, the GM will provide multiple channels for submitting complaints confidentially and securely. GM operators and the Community Liaison Officer (CLO) will receive training on handling SEA/SH cases with confidentiality, empathy, and without judgment.

The GM will incorporate the following practices for addressing SEA/SH grievances:

- Multiple complaint channels will be made available to enhance accessibility.
- No identifiable information about the survivor will be recorded in the GM.
- The GM will only collect the following information related to SEA/SH allegations:
 - The nature of the complaint (recorded in the complainant's own words, without direct questioning).
 - Whether the alleged perpetrator was associated with the project, to the best of the survivor's knowledge.
 - If possible, the age and sex of the survivor.
 - If possible, information on whether the survivor was referred to support services.

All information recorded in the GM, especially details related to the complainant's identity, will be kept strictly confidential.

The project GM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher-level superior or go directly to the police, as stipulated in the national referral system of the country for dealing with such cases. The content and procedures of the project's GM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. If the ILBANK PIU will receive a SEA/SH related grievance, these grievances will be directed to national referral systems immediately and record that this has been directed, as set out in the GM Procedure of ILBANK. All details of the complainant of the sensitive case will be kept strictly confidential.

7.10 Reporting on Grievance Mechanism

Contractors will prepare and submit Environmental and Social Monitoring Reports (ESMRs) to the Supervision Consultant on a monthly and quarterly basis. The Supervision Consultant will be responsible for reviewing the ESMRs, checking grievance boxes, and maintaining grievance logs. Following their review, the Supervision Consultant will compile and submit the ESMRs, along with a summary of grievances, their resolutions, and the grievance logs, to ILBANK. ILBANK will provide the ESMRs and progress reports to the EBRD annually.

8. Monitoring and Reporting

ILBANK will implement the monitoring activities throughout the lifetime of the Project. This SEP will be updated based on feedback received from stakeholders. Communication tools included in the SEP that are not accepted by stakeholders will also be revised accordingly. Additionally, the SEP will be updated in case of

significant changes to the Project's scope that impact stakeholder engagement activities. Description of the project will be published on the ILBANK's website (www.ilbank.gov.tr), ensuring that personal identity information is removed to protect individual privacy. The exact dates, times and addresses of the meeting locations will be shared within the SEP as this information becomes available.

ILBANK will also publish details of the issues raised during the consultation process and any appropriate feedback on these issues on its website.

Contractors will deliver Environmental and Social Monitoring Reports (ESMRs) to the MASKI on a monthly and quarterly basis. Following review, the Municipality will submit the ESMRs on the Project's environmental and social performance to ILBANK quarterly, along with a summary of grievance logs (including grievance logs as an annexe) and a summary of stakeholder engagement activities conducted during the reporting period.

The grievance mechanism established for the Project will be actively utilized, and a summary of its outputs will be reported to the MASKI and the European Bank for Reconstruction and Development (EBRD) on a monthly and quarterly basis.

Project reporting periods are different for construction and operation phases. ILBANK will submit ESMRs to the EBRD on a quarterly basis, along with the Project's Progress Report, in line with the reporting requirements defined in the Loan Agreement.

The ILBANK will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national and international regulations, as well as the requirements set by lenders.

A.1 Minutes of Meetings

Meeting with Neighbourhood Headmen

R.Ç.- Abdulgaffar Neighbourhood

R.Ç. stated that the population has declined following the earthquake and that infrastructure problems are minimal; however, issues related to the taste and color of drinking water have been reported, particularly affecting the elderly and children. Improvements in energy infrastructure, disaster management, and public spaces are recommended.

H.I.- Akpınar Neighbourhood

H.I. noted that water cuts, environmental pollution (noise, dust, pests), and the absence of a mosque in this low-income area significantly affect the elderly. Improvements to drinking water, wastewater infrastructure, healthcare, and educational facilities are requested.

N.S.- Alacakapı Neighbourhood

N.S. reported that the significant population increase following the earthquake has placed pressure on existing infrastructure, and that issues related to water quality and sewerage have affected both local businesses and residents. It was stated that basic services are inaccessible. Strengthening road, healthcare, and energy infrastructure, as well as improving public spaces, is recommended.

T.T.- Aslan Bey Mahallesi Neighbourhood

T.T. noted that the rainwater drainage channels are clogged and that sewage issues affect Halep-Mimar Sinan, Şehit Yusuf Kamacı, Gebeş, and Barutçu streets. Regular cleaning of the channels and upgrades to the sewage system are needed.

E.G.- Ataköy Mahallesi Neighbourhood

E.G. reported that frequent leaks in clean water lines disrupt the supply. Enhanced maintenance and pipe repairs are necessary to ensure reliable water access.

S.S.- Atatürk Neighbourhood

S.S. reported that the population decreased after the 2023 earthquake. Issues such as inadequate infrastructure, lack of sewerage, and poor transportation services were mentioned. Urgent improvements in the drinking water infrastructure were recommended.

D.D.- Bahçelievler Neighbourhood

D.D. emphasized that, following the 2023 earthquake, infrastructure deficiencies such as water shortages and sewerage problems have become more severe due to the increase in population, and are now considered critical issues. Improvements in drinking water, wastewater, and transportation infrastructure are recommended.

A.S.- Banazı Neighbourhood

A.S. reported that the population has declined, and that water cuts and the aging sewerage system have led to health and mobility issues, particularly for the elderly and children. Urgent improvements have been requested for drinking water, wastewater, road infrastructure, and stormwater drainage systems.

R.T.- Başharık Neighbourhood

R.T. stated that the population decreased after the 2023 earthquake. He reported that water overflows from upper elevations caused damage to school and residential compound walls, and that closed drainage channels exacerbated the problem. He also noted issues with water pressure along Uşak Road and emphasized that damaged drainage channels must be repaired or replaced.

M.B.- Battalgazi Neighbourhood

M.B. reported that the population growth after the earthquake caused water cuts and sewer overflows, and that women and children were affected by the increase in cleaning work. He stated that there is no rainwater drain, water pressure is low, water does not reach the 2nd floor, and there is a pressure problem on Fatih Sultan, Kızılırmak, and Mahmut Sultan streets. Urgent improvements are recommended in drinking water, wastewater, road infrastructure, and digital access.

M.A.- Beylerbaşı Neighbourhood

M.A. noted that the population decreased after the 2023 earthquake. It was stated that no significant problems were observed in the neighbourhood overall. No additional information was provided.

İ.M.- Boran Neighbourhood

İ.M. indicated that water shortages and sewerage problems following the earthquake may affect the remaining residents, particularly in light of the population decline after the 2023 earthquake. It is recommended to strengthen road and transportation infrastructure and to develop projects that will generate employment opportunities.

E.E.- Büyük Mustafa Paşa Neighbourhood

E.E. stated that the population decreased after the earthquake. He reported that many residents considered moving to TOKİ housing or applied for on-site transformation, while some who initially left eventually returned. It was stated that infrastructure in older settlements needs to be completely renewed.

A.P.- Çamurlu Neighbourhood

A.P. reported that population increased after the 2023 earthquake. It was recommended to improve the drinking water, wastewater, road, and energy infrastructure. No additional information was provided.

A.B.- Çarmuzu Neighbourhood

A.B. reported that malfunctions in the water supply and sewerage systems may affect the remaining residents, although the population has declined following the 2023 earthquake. Additionally, improvement works are requested in the stream bed area of Boncuk Street. Enhancements in drinking water, wastewater, and road infrastructure are recommended.

M.B.- Cirikpınar Neighbourhood

M.B. emphasised that infrastructure deficits, such as water shortages and sewage problems post-earthquake, may affect any remaining residents, the population of the region decreased after the 2023 earthquake. Improvements to drinking water, wastewater, other infrastructures and community spaces are suggested.

Ş.Ç.- Çolakoğlu Neighbourhood

Ş.Ç. highlighted that infrastructure damage from the 2023 earthquake, including water and sewage systems, may affect any remaining residents, with the population decrease. He stated that wild irrigation is done with drinking water in hobby gardens, and subscriptions are not legal. Development of drinking water, wastewater, and road infrastructure is suggested based on regional trends.

B.İ.- Çöşnük Neighbourhood

B.İ. emphasized that the water and sewage system failures after the earthquake, together with population of the region decreased after the 2023 earthquake, could affect the remaining residents. He stated that 60% of the infrastructure is complete, but there is no infrastructure in 2 reserve areas. In addition, there are water tank and hydrophore problems in the upper areas. After the excavation, proper coating is not done, the line bursts. He said that container workplaces are flooded with rainwater. It is recommended to strengthen the drinking water, wastewater and health infrastructure.

Ş.D.- Cumhuriyet Neighbourhood

Ş.D. indicated that water cuts and sewage issues cause health problems. Improvements to drinking water, wastewater, road and other infrastructures are suggested.

S.B.- Dabakhane Neighbourhood

S.B. reported S.B. stated that severe water and sewage issues in this heavily damaged neighbourhood, worsened by ongoing construction, affect residents' quality of life. Enhancements to drinking water, energy infrastructure, and disaster management systems are suggested.

O.K.- Dilek Neighbourhood

O.K. stated that the population increased after the earthquake. Urgent improvements were called for in drinking water, road and energy infrastructure and natural gas supply.

A.B.- Dolomantepe Neighbourhood

A.B. emphasized that infrastructure deficiencies, such as water and sewerage problems resulting from the 2023 earthquake, are likely to become more pronounced with the post-earthquake population increase. It was noted that the infrastructure and drinking water pipelines are 40–50 years old and require replacement. Strengthening the infrastructure for drinking water, wastewater, and healthcare services is recommended.

N.H.- Fırat Neighbourhood

N.H. reported that the population increased after the 2023 earthquake and infrastructure remained inadequate. He highlighted rainwater accumulation on Emek Street, and concerns regarding freezing of water from a nearby container settlement during winter. It was stated that rainwater is not discharged into the dam and that the existing 20-year-old wastewater treatment plant is insufficient. Infrastructure upgrades and water efficiency training were recommended.

H.B.- Gazi Neighbourhood

H.B. reported that the population declined after the 2023 earthquake. It was noted that women were disproportionately affected by sewage-related problems. Improvements in drinking water infrastructure and environmental sanitation projects were recommended.

M.Y.- Gedik Neighbourhood

M.Y. reported that the population increased due to ground-related migration after the earthquake. Sewage and water access problems were noted. It was also requested that the number of street lights be increased for safety reasons. The neighbourhood's infrastructure has not been upgraded since it was founded, and improvements to the drinking water and wastewater systems have been suggested.

B.Y. - Göztepe Neighbourhood

B.Y. stated that the population has decreased, and that the water scarcity and sewer malfunctions experienced after the earthquake may affect the remaining residents. The replacement of outdated pipelines was requested. The establishment of disaster management and early warning systems is recommended.

Ü.E.- Hamidiye Neighbourhood

Ü.E. reported that the population decreased after the 2023 earthquake.

H.Ç.- Hanımınçiftliği Neighbourhood

H.Ç. stated that the population increased after the 2023 earthquake. He also mentioned that the neighbourhood was among the last to receive public services. Due to the absence of a sewer system, residents use septic tanks, causing odour problems, especially near a school. Limited access to water was reported, leading to animals entering homes and accumulation of rainwater. Infrastructure development for drinking water and energy systems was strongly recommended.

B.T.- Hasırcılar Neighbourhood

B.T. emphasised that population increased in the region due to migration after the earthquake. No additional information provided. Development of drinking water, wastewater and other infrastructure is recommended.

S.K.- Hatunsuyu Neighbourhood

No feedback has been received about this neighbourhood.

K.K.- Hidayet Neighbourhood

K.K. stated that the population decreased after the 2023 earthquake, and the only support received was from the local social assistance association. Drinking water and sewage issues were reported as severe. Improvements in drinking water and energy infrastructure were recommended.

O.Ü.- Hoca Ahmet Yesevi Neighbourhood

O.Ü. stated that water and sewerage problems have persisted despite the decline in population following the earthquake. Improvements in drinking water, road infrastructure, and public spaces are recommended.

M.Ç.- Horata Neighbourhood

M.Ç. reported that the population of the region decreased after the 2023 earthquake. No additional information was provided.

F.Ş.- İlyas Neighbourhood

F.Ş. stated that the population increased as the neighbourhood experienced minimal damage after the 2023 earthquake. He provided additional comments on the need for infrastructure renovation on Dinç Street, water pressure regulation, prevention of illegal water use, and overall infrastructure renewal.

M.C.- İnönü Neighbourhood

M.C. reported that infrastructure damage, including water and sewage systems, caused by the 2023 earthquake, the problems increased after the earthquake due to the central location of the neighbourhood and the population increased. It is recommended to strengthen the drinking water, wastewater and health infrastructure. In addition, it is requested that MASKI's artesian wells related to drinking water be closed or sent to another remote area, and that only mains water be provided to the neighbourhood.

M.G.- İskender Neighbourhood

M.G. stated that the population increased significantly because earthquake damage was minimal. He noted that the sewage and drinking water infrastructure was already insufficient before the earthquake and requested additional drainage grates. It was recommended that the drinking water infrastructure be improved.

T.K.- İsmetiye Neighbourhood

T.K. emphasized that post-earthquake infrastructure deficiencies such as water cuts and sewage problems could affect the remaining residents, along with the population of the region decreased due to migration after the 2023 earthquake. He stated that there were no sturdy buildings left, water was flowing under the collapsed buildings, and subscriptions were not closed. Based on regional trends, it is recommended to strengthen drinking water, wastewater, and transportation infrastructure.

A.A.- İzzetiye Neighbourhood

A.A. stated that the population increase after the earthquake worsened existing problems with water and sewage systems. Improvements were suggested for drinking water supply, stormwater drainage, and road infrastructure.

R.O.- Karahan Neighbourhood

R.O. noted that the 50- to 55-year-old concrete pipes are outdated, and that 30 to 35 households still rely on septic pits, which pose health risks. Separate drinking water and sewage systems are required to prevent contamination.

E.T.- Kavaklıbağ Neighbourhood

E.T. stated that despite the population decreasing due to migration after the 2023 earthquake, water cuts and sewage overflows could affect the remaining residents. He noted that there was a high level of destruction in the region. It is recommended to improve drinking water, wastewater, roads and other infrastructure.

A.D.- Kendirli Neighbourhood

A.D. noted that infrastructure damages, including water and sewage systems, occurred in the 2023 earthquake and that problems increased after the earthquake due to the increase in population. It was suggested that drinking water, wastewater, road and other infrastructures be strengthened. It was also requested that this be done urgently.

M.T.- Kernek Neighbourhood

M.T. stated that the population decreased as people were reluctant to move into the area due to fear of earthquakes. He reported that various problems stemmed from inadequate infrastructure and noted that the existing systems were 40 to 50 years old. It was recommended to improve the drinking water infrastructure, strengthen road and transportation infrastructure, and develop projects that would increase employment.

C.D.- Kiltpe Neighbourhood

C.D. stated that the population increased after the 2023 earthquake and noted that the main issue in the neighbourhood was severe infrastructure deficiency. No further details were given.

C.I.- Konak Neighbourhood

C.I. reported that infrastructure damages, including water and sewage systems, occurred in the 2023 earthquake, and that problems increased after the earthquake due to the increase in population. It is recommended that drinking water, wastewater and other infrastructures be strengthened.

F.K.- Koşu Neighbourhood

F.K. reported that the population of the neighbourhood decreased after the 2023 earthquake. It was recommended to develop drinking water, wastewater, and road infrastructure

K.Ö.- Küçük Mustafa Paşa Neighbourhood

K.Ö. stated that the population decreased after the 2023 earthquake. Persistent problems with sewage and drainage were reported, including water accumulation on İpekçi Street. Although complaints declined after the earthquake, infrastructure improvements remain necessary.

H.S.- Merkez Beydağı Neighbourhood

H.S. noted that while population has not changed after an earthquake, infrastructure damage, including water and sewage systems, may affect residents. He also noted that flooding in the Karagöz stream bed affected the bazaar, there was no rain drainage, and there was no water flowing in 13-14-story buildings. Improvements to drinking water, wastewater, and road infrastructure are recommended.

K.K.- Merkez Fatih Neighbourhood

K.K. reported that the population decreased after the 2023 earthquake. No additional details were provided.

Y.Ç.- Meydanbaşı Neighbourhood

Y.Ç. reported that residents may be affected by the challenges of post-earthquake reconstruction, including water supply and sewage problems, along with the increasing population. Strengthening of drinking water, wastewater and transportation infrastructure is recommended.

A.E.- Orduzu Neighbourhood

A.E. stated that infrastructure, sewage, and drinking water problems were at a moderate level. It was suggested that road, transportation, and health infrastructure be developed.

A.Ş.- Paşa Köşk Mahallesi Neighbourhood

A.Ş. reported that water cuts last 2-3 hours, and rainwater from TOKİ floods building basements. Improved drainage systems and a reliable water supply are recommended.

İ.P.- Samanköy Neighbourhood

İ.P. stated that the population has increased following the earthquake, and that frequent water cuts and sewer overflows have negatively affected residents. It was reported that the 60-year-old water pipelines frequently rupture, and while the number of houses was previously around 100, it has now reached 400, resulting in an insufficient water supply. Additionally, he stated that the construction of approximately 80 new rural houses has begun, which is expected to further exacerbate water shortages. Improvements in drinking water supply, road infrastructure, and disaster management systems is recommended.

H.G.B.- Samanlı Neighbourhood

H.G.B. stated that minimal social assistance needs and sewage overflows affect residents, with women facing increased cleaning tasks. Development of drinking water, wastewater, other infrastructures and community spaces is suggested.

F.Ö.- Sancaktar Neighbourhood

F.Ö. stated that after the 2023 earthquake, the population decreased as residents were reluctant to live in houses with minor or moderate damage. High levels of infrastructure and security problems, as well as unemployment and poverty, were also reported. It was recommended to develop drinking water and energy infrastructure.

H.A.- Selçuklu Neighbourhood

H.A. reported that population growth from post-earthquake container housing and infrastructure issues, including water quality and sewage backflows, affect women with increased cleaning tasks and mobility challenges.

H.A. also reported that has storm drains, but water failures affect the entire neighbourhood and other neighbourhoods. It is recommended that water shut-off valves be installed at the beginning of the streets. He specifically mentioned asbestos pipes and rainwater problems. Strengthening road infrastructure and moving electrical lines underground are recommended to address safety and access concerns.

A.A.- Serin Tepe Neighbourhood

A.A. reported that the 30-year-old drinking water lines are rusty and made of asbestos, posing health risks. There are deficiencies in the sewage infrastructure. Urgent replacement of pipes and sewage improvements are needed.

S.C.- Şehitfevzi Neighbourhood

S.C. stated that there was an increase in the population after the 2023 earthquake and following the delivery of TOKİ houses to their owners. No additional information was provided.

M.C.- Şeyhbayram Neighbourhood

M.C. stated that the population decreased as a result of the destruction caused by the 2023 earthquake. It was suggested that the drinking water, wastewater, and road infrastructure be improved.

E.A.- Şıkşık Neighbourhood

E.A. stated that post-earthquake infrastructure challenges such as water shortages and sewage problems may affect the remaining residents, but the population decline after the 2023 earthquake shows that there are few or no residents left. He also said that the infrastructure built with the French bank grant in 2019 was not satisfactory, a new tender was made, it was supposed to be completed in 3 months but it was not completed. Improvements in drinking water, wastewater and road infrastructure are suggested based on regional trends.

İ.Ö.- Taştepe Neighbourhood

İ.Ö. stated that the neighbourhood, which had received migration before the earthquake due to a lack of infrastructure services, continued to receive migration after the earthquake as it was declared a reserve area. Improvements were suggested for drinking water, wastewater systems, road infrastructure, and streambed rehabilitation.

A.Y. - Tecde Neighbourhood

A.Y. reported that population growth has worsened water and sewage issues, affecting the elderly and disabled with accessibility and hygiene challenges. Improvements to drinking water, road, and energy infrastructure are suggested.

N.K.- Topsöğüt Neighbourhood

N.K. reported that the 2023 earthquake caused damage to the drinking water and sewerage infrastructure, and that these issues have intensified with the subsequent increase in population. It was also noted that unplanned construction has become more widespread. Strengthening the infrastructure for drinking water, wastewater, roads, and transportation is recommended.

M.P.- Toptaş Neighbourhood

M.P. reported that population growth due to water shortages and sewer overflows and migration due to post-earthquake recovery may affect residents there. It was also stated that there was a 2 km sewage shortage and asbestos pipes needed to be replaced. Development of drinking water, wastewater and health infrastructure is recommended.

M.D.- Toygar Neighbourhood

M.D. stated that the population increased after the 2023 earthquake, and that there were moderate infrastructure problems. No further information was provided.

A.O.- Üçbağlar Neighbourhood

A.O. reported that the population is decreasing and the post-earthquake rescue efforts could lead to water supply disruptions and sewage system failures for the remaining residents in the area. It was also emphasized that water and wastewater should be transmitted through separate systems. Improvements in infrastructure for drinking water, wastewater and other related services were recommended.

A.K.- Yaka Neighbourhood

A.K. emphasized that the increase in population has led to water pollution and sewerage problems, adversely impacting public health. No additional information was provided. Strengthening wastewater management, road infrastructure, and healthcare services is requested.

S.S.- Yavuz Selim Neighbourhood

S.S. stated that the population increased after the earthquake. He noted that there were no issues related to sewer blockages or drainage. It was recommended to establish disaster management and early warning systems.

S.T.- Yeşilkaynak Neighbourhood

S.T. stated that migration after the 2023 earthquake led to a population decline. Severe problems were reported with infrastructure, sewage, and drinking water. Strengthening of drinking water, wastewater, and transportation infrastructure was recommended.

B.A. -Yıldıztepe Neighbourhood

B.A. emphasized that temporary migration and infrastructure problems such as water cuts and sewage overflows after the earthquake affected women's daily work. He stated that there was a pressure problem on Yeşilçam Street (10-story buildings) and that the sewage infrastructure was old. It is requested to be renewed according to the new zoning plan. MASKI responded by saying that hydrophore is mandatory and that pressure increase will burst the pipes on the lower floors. It is suggested to develop drinking water, wastewater, road infrastructure and environmental cleaning projects.

E.E.- Zafer Neighbourhood

E.E. stated that the population decreased due to destruction caused by the earthquake. He noted that elderly residents were most affected by sewage issues, and that the infrastructure was significantly outdated. Improvements in drinking water and energy infrastructure were recommended.

M.C.- Zaviye Neighbourhood

M.C. reported that no major problems were experienced after the 2023 earthquake, but there were problems in the sewer system due to blockages caused by insufficient pipe diameters and connection problems in the revised areas on Mevlüt Aslanoğlu Street.

Container Housing Infrastructure and Management Issues in Malatya

Questions were posed by the facilitators and responses were provided by individual participants. Each answer is listed with the participant's initials and institutional affiliation.

- **Question: How is the infrastructure of container cities managed, and what is their distribution in Malatya?**

Ş.D. – AFAD Container Housing Coordinator

52 Temporary Container Houses have been established in Malatya. The majority of these centers coordinated by AFAD are concentrated in the Yeşilyurt and Battalgazi districts.

- **Question: Are there any security issues caused by the lack of infrastructure?**

Ş.D. – AFAD Container City Coordinator

Non-entitled residents, such as newcomers, evicted tenants, 500 separated individuals, newlyweds, and workers, live in private container cities, supported by Esen Kart for the poor, social service offices, and care for the elderly and disabled. Security includes 4 police during the day, 8 guards at night, and card-based entry.

- **Question: What challenges do residents face in transitioning from container cities?**

Ş.D. – AFAD Container Housing Coordinator

Residents resist moving to permanent housing due to free utilities, leading to high water and electricity consumption, with some exploiting victim status by taking AFAD-provided items to their homes. Housing delivery will take three more years, with TOKI ensuring complete infrastructure, and four Syrian container cities use package treatment and well water under Migration Directorate oversight.

- **Question: How are maintenance issues handled in container cities?**

F.S.– AKOM Representative

AKOM manages 40–50 daily maintenance calls for issues like faucet leaks or ceiling drips, with MASKI reporting 29,635 requests from June to December 2024 (1,645 sewer, 20,121 water faults, 6,833 vacuum truck, 857 towing). A 33-person technical team responds via a chain of command (112 call center -AFAD - technical team -relevant units)

- **Question: What coordination and security challenges exist in container cities?**

F.S.– AKOM Representative

Each container camp has a coordinator, a TYP representative, a National Education deputy, and 3 AFAD staff assigned by the governor's office. Challenges include unauthorized occupants (e.g., MALET 2, F12-13) and problematic guard assignments with prior theft records, with managers facing safety risks in court due to public exposure alongside offenders.

- **Question: What infrastructure issues are reported in MALET container cities?**

Mr.S.– MALET Container Housing Representative

MALET 1 (1,200 households, 4,344 people) experienced water cuts, with high-pressure water return flooding 80 containers, while MALET 2 (1,268 households, 4,119 people) faces unresolved low water pressure in D-B 7 rows despite MASKI and DSI interventions. Weekly water tests confirm no current waterborne diseases, though early post-earthquake outbreaks occurred.

- **Question: What social challenges do residents face in MALET container cities?**

Mr.S.– MALET Container Housing Representative

Children face study difficulties due to space constraints, mitigated by libraries (open until 9 PM), TEGV, Kamer/Kadem events, and public education courses. Some residents exploit victim status, staying in containers despite owning homes or misusing AFAD aid.

- **Question: What infrastructure issues are reported in Teknokent container Camp?**
Ms.K.– Teknokent Container Housing Representative

Teknokent (2,126 households, 8,111 people) has minor wastewater clogs in laundry facilities (e.g., socks in pipes), with weekly water tests ensuring no health risks. Infrastructure is stable but requires ongoing maintenance to prevent disruptions.

- **Question: What challenges do you face as a female manager in Teknokent?**
Ms.K.– Teknokent Container Housing Representative

She faced a threatening confrontation resolved by police but notes minimal personal issues. Security concerns include rare thefts (1–2 annually) and legal risks, as managers' identities are exposed in court alongside offenders' relatives, posing potential dangers.

General Container Housing Issues :

Malatya's container cities, housing 90,000 residents, face infrastructure challenges such as water pressure fluctuations (e.g., flooding in MALET 1, low pressure in MALET 2), minor wastewater clogs in Teknokent, and high utility consumption due to residents' reluctance to transition to permanent housing, which TOKI will deliver with complete infrastructure in three years. Socially, a victim mentality among some residents leads to aid exploitation, while robust support from Kızılay, social services, and a new physiotherapy center aids vulnerable groups. Security issues, including rare thefts, unauthorized occupants, and managers' safety risks during legal proceedings, highlight the need for improved oversight and resource management.

A.2 List of Stakeholders Contacted

Meeting with Neighbourhood Headmen

A.A- Serin Tepe Neighbourhood
R.Ç.-Abdulgaffar Neighbourhood
H.I. - Akpınar Neighbourhood
N.S. - Alacakapı Neighbourhood
T.T.- Aslan Bey Mahallesi Neighbourhood
E.G.- Ataköy Mahallesi Neighbourhood
S.S.- Atatürk Neighbourhood
D.D. - Bahçelievler Neighbourhood
A.S. - Banazı Neighbourhood
R.T.- Başharık Neighbourhood
M.B. - Battalgazi Neighbourhood
M.A.- Beylerbaşı Neighbourhood
İ.M. - Boran Neighbourhood
E.E.- Büyük Mustafa Paşa Neighbourhood
A.P.- Çamurlu Neighbourhood
A.B.- Çarmuzu Neighbourhood
M.B. - Cirişpınar Neighbourhood
Ş.Ç. - Çolakoğlu Neighbourhood
B.İ. - Çöşnük Neighbourhood
Ş.D.- Cumhuriyet Neighbourhood
S.B. - Dabakhane Neighbourhood
O.K. - Dilek Neighbourhood
A.B. - Dolomantepe Neighbourhood
N.H.- Fırat Neighbourhood
H.B.- Gazi Neighbourhood
M.Y. Gedik Neighbourhood
B.Y. - Göztepe Neighbourhood
Ü.E.- Hamidiye Neighbourhood
H.Ç.- Hanımınçiftliği Neighbourhood
B.T. - Hasırcılar Neighbourhood
S.K.- Hatunsuyu Neighbourhood

K.K. -Hidayet Neighbourhood
O.Ü. - Hoca Ahmet Yesevi Neighbourhood
M.Ç. - Horata Neighbourhood
F.Ş.- İlyas Neighbourhood
M.C. - İnönü Neighbourhood
M.G.- İskender Neighbourhood
T.K. - İsmetiye Neighbourhood
A.A.- İzzetiye Neighbourhood
R.O- Karahan Neighbourhood
E.T. - Kavaklıbağ Neighbourhood
A.D.- Kendirli Neighbourhood
M.T.- Kernek Neighbourhood
C.D.- Kiltpe Neighbourhood
C.I.- Konak Neighbourhood
F.K.- Koşu Neighbourhood
K.Ö.- Küçük Mustafa Paşa Neighbourhood
H.S. - Merkez Beydağı Neighbourhood
K.K.- Merkez Fatih Neighbourhood
Y.Ç. - Meydanbaşı Neighbourhood
A.E.- Orduzu Neighbourhood
A.Ş.- Paşa Köşk Mahallesi Neighbourhood
İ.P.- Samanköy Neighbourhood
H.G.B.- Samanlı Neighbourhood
F.Ö.- Sancaktar Neighbourhood
H.A. - Selçuklu Neighbourhood
A.A- Serin Tepe Neighbourhood
S.C.- Şehitfevzi Neighbourhood
M.C. - Şeyhbayram Neighbourhood
E.A. - Şıkşık Neighbourhood
İ.Ö. - Taştepe Neighbourhood
A.Y. - Tecde Neighbourhood
N.K.- Topsöğüt Neighbourhood
M.P. - Toptaş Neighbourhood
M.D.- Toygar Neighbourhood
A.O. - Üçbağlar Neighbourhood

A.K.- Yaka Neighbourhood

S.S.- Yavuz Selim Neighbourhood

S.T.- Yeşilkaynak Neighbourhood

B.A. -Yıldıztepe Neighbourhood

E.E.- Zafer Neighbourhood

M.C.- Zaviye Neighbourhood

Meeting with Container camp Coordinator and Representative

Ş.D. – AFAD Container camp Coordinator

F.S.– AKOM Representative

Mr.S.– MALET Container camp Representative

Ms.K.– Teknokent Container camp Representative

A.3 Sample Grievance Form

		COMPLAINT SUBMISSION FORM			
Person Filling the Form:			Date:		
Interview Agenda:			Reference No:		
1. INFORMATION ABOUT THE COMPLAINANT					
Name Surname <i>(Anonymous applications are also accepted. In case the complaint is submitted anonymously, the feedback regarding the measures taken/to be taken may not be communicated to the complainant. The result of the complaint will be made public on the ILBANK website) :</i>			How to receive the complaint		
Turkish ID Number:			Phone	☐	
Phone:			Face to face	☐	
Address:			Web-site/ E-Mail	☐	
E-Mail:			Other (Explain)	☐	
Stakeholder Type					
Public Institution	☐	Project Affected People	☐	Private Enterprise	☐
Interest Groups	☐	Industry Associations	☐	Workers' Union	☐
			Trade Association	☐	
			Media	☐	
			NGO	☐	
			University	☐	
2. DETAILED INFORMATION ON THE COMPLAINT					
Description of the Complaint:					
Resolution method requested by the complainant					

**Registered Person Name
Surname/Signature**

Complainant Name Surname/Signature

A.4 Grievance Closure Form

GRIEVANCE/COMMENT CLOSE OUT FORM		
Close-out Inspection		
Close-out Date		
Case #		
Assessment of Grievance/Suggestion		
Action Taken		
List of Documents that verify the Action		
Date of Action		
Inspector Official	Full Name _____ Signature _____	
Assessment of Monitoring		
Necessity of Monitoring	Necessary	Not Necessary
Duration of Monitoring		
Responsible Party		
Date Completed		
Results of Monitoring		
Signature of Complainant (if willing)	_____	