

MUGLA WATER PROJECT

Annex D7 Stakeholder Engagement Plan (SEP)

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Acronyms / Abbreviations

Acronym / Abbreviation	Full Name
CE	Citizen Engagement
CİMER	Presidency's Communication Center
EIA	Environmental Impact Assessment
EBRD	European Bank for Reconstruction and Development
ESA	Environmental and Social Assessment
ESP	Environmental and Social Policy
ESR	Environmental and Social Requirements
GM	Grievance Mechanism
MUSKI	Muğla Water and Sewerage Administration
NRW	Non-revenue Water
NTS	Non-Technical Summary
PCM	Project Complaint Mechanism
PIT	Project Implementation Team
PIU	Project Implementation Unit
SCADA	Supervisory Control and Data Acquisition
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
UHDR	Universal Declaration of Human Rights

Glossary

Grievance Mechanism (GM)

Grievance Mechanism refers to an accessible, transparent and inclusive system, process or procedure established by the Implementing Agency to receive, assess and address complaints, concerns and suggestions for improvement in a timely manner. The mechanism facilitates the resolution of grievances arising in connection with the Project and ensures that affected stakeholders are able to submit grievances without fear of retaliation. The Grievance Mechanism operates throughout the Project life cycle and is aligned with the EBRD Environmental and Social Policy (2024) and Environmental and Social Requirement 10 (ESR10).

Implementing Agency

Implementing Agency refers to the Muğla Water and Sewerage Administration (MUSKI), which assumes overall responsibility for the implementation of the Project. MUSKI is responsible for project coordination, implementation, monitoring and reporting, including the preparation, disclosure and implementation of all Environmental and Social Framework (ESF) instruments required under the EBRD Environmental and Social Policy.

Provincial Organization

Provincial Organization refers to the provincial and district-level organizational structure of MUSKI, operating under the authority of the Implementing Agency. This includes MUSKI's provincial and district units responsible for service delivery, field operations, stakeholder engagement and grievance handling at the local level, in coordination with MUSKI headquarters.

Stakeholder

Stakeholders refer to individuals or groups who:

- (a) are affected or are likely to be affected by the Project (project-affected parties); and
- (b) have an interest in the Project (other interested parties).

Stakeholders may include, but are not limited to, local communities, households, vulnerable and disadvantaged groups, municipal authorities, public institutions, non-governmental organizations, contractors, workers and other relevant entities.

Stakeholder Engagement

Stakeholder Engagement refers to a continuous and systematic process undertaken by the Project to identify, communicate with and engage relevant stakeholders throughout the Project life cycle. The process aims to promote transparency, build trust, foster a sense of ownership and support informed decision-making. Stakeholder Engagement includes activities such as stakeholder identification and analysis, information disclosure, consultations, feedback collection, grievance management, stakeholder participation in monitoring, and reporting to stakeholders. The process involves both state and non-state actors.

Stakeholder Engagement Plan (SEP)

Stakeholder Engagement Plan (SEP) refers to a project-level management tool that defines the strategy, timing and methods of engagement with stakeholders throughout the Project life cycle, in accordance with the EBRD Environmental and Social Policy and ESR10.

The SEP distinguishes between project-affected parties and other interested parties and describes:

- the information to be disclosed,
- the methods of engagement and consultation,
- the grievance mechanism applicable to stakeholders, and
- the roles and responsibilities for implementation.

Where a project consists of a program and/or multiple sub-projects and detailed stakeholder information is not available at the initial stage, the SEP may be prepared as a framework instrument and updated as sub-project details become available.



Executive Summary

This Stakeholder Engagement Plan (SEP) has been prepared for the Muğla Water Project, which will be implemented by the Muğla Water and Sewerage Administration (MUSKI) as the Environmental and Social Policy (ESP, 2024), in particular Environmental and Social Requirement 10 (ESR10): Information Disclosure and Stakeholder Engagement, and constitutes an integral part of the Project's Environmental and Social Assessment (ESA) and associated Environmental and Social management instruments.

The Project aims to rehabilitate and improve drinking water transmission and distribution systems within the provincial boundaries of Muğla in order to reduce non-revenue water losses, improve operational efficiency and service quality, and establish a sustainable water supply system. The Project includes rehabilitation of existing water transmission and distribution networks, the procurement and installation of Supervisory Control and Data Acquisition (SCADA) systems and related monitoring and maintenance infrastructure. The Project is expected to contribute to improved water service reliability, reduced water losses, enhanced resource efficiency, and increased climate resilience of water infrastructure.

The Project has been categorized as Category B in accordance with the EBRD Environmental and Social Policy (2024). Potential environmental and social risks and impacts are expected to be site-specific, largely reversible and predominantly associated with construction activities, including temporary access restrictions, noise, dust, traffic disruptions, occupational and community health and safety risks, and stakeholder concerns related to service interruptions and affordability.

The objective of this SEP is to define a structured and inclusive approach for engaging stakeholders throughout the Project life cycle.

Stakeholders identified for the Project fall into the following categories:

- **Project-affected parties**, referring to individuals or groups who are affected or likely to be affected by the Project due to actual or potential impacts on their physical environment, access to services, health and safety, livelihoods or well-being, including residents, businesses and land users located in areas where construction and rehabilitation works will take place.
- **Other interested parties**, referring to individuals or groups who may have an interest in the Project due to its nature, location or public relevance, including local and metropolitan municipalities, public institutions, regulatory authorities, professional chambers, civil society organizations, and academic or technical institutions.
- **Vulnerable or disadvantaged groups**, referring to individuals or groups who, due to their socio-economic characteristics or circumstances, may be disproportionately affected by the Project or may face barriers in participating in the stakeholder engagement process. These may include low-income households, women, elderly persons, persons with disabilities, seasonal populations and other groups requiring targeted engagement measures.

Stakeholder engagement activities under the Project will be guided by the following principles:

Two-way and meaningful communication;

- Engagement free from manipulation, coercion or intimidation; and
- Inclusive participation ensuring fair representation with respect to gender, age, socio-economic status and other relevant characteristics.



MUGLA WATER PROJECT
Executive Summary

This SEP outlines the stakeholder engagement strategy and planned activities for the pre-construction, construction and operation phases of the Project. It describes the methods and timing of information disclosure, consultation and engagement, defines institutional roles and responsibilities for implementation, and establishes a Grievance Mechanism to enable stakeholders to raise concerns and complaints in a transparent, accessible and timely manner.

The SEP is a living document and will be updated as necessary to reflect changes in Project design, implementation arrangements or stakeholder composition. In the event of significant changes in project design, scope, or implementation arrangements that may affect stakeholders, additional stakeholder consultations will be carried out. Relevant information regarding such changes will be disclosed through the communication channels defined in this SEP to ensure that affected stakeholders are adequately informed and have the opportunity to provide feedback. Implementation of the SEP will be monitored throughout the Project life cycle, and stakeholder engagement activities and grievance management outcomes will be documented and reported in accordance with EBRD requirements. The Project will monitor the participation and accessibility of vulnerable groups within stakeholder engagement activities. Monitoring indicators may include participation rates of vulnerable stakeholders in consultation meetings, accessibility of the grievance mechanism, and targeted outreach activities aimed at ensuring that vulnerable groups are adequately informed about the project and its grievance procedures.

Implementing Agency and financed by the European Bank for Reconstruction and Development (EBRD). The SEP has been developed in accordance with the EBRD



1. INTRODUCTION

This document constitutes the Stakeholder Engagement Plan (SEP) for the Muğla Water Project (the Project), which is implemented by the Muğla Water and Sewerage Administration (MUSKI) as the Implementing Agency and financed by the European Bank for Reconstruction and Development (EBRD).

The SEP explains the stakeholder consultation and engagement processes planned to be carried out and implemented throughout the life cycle of the Project. The SEP has been prepared in accordance with the EBRD Environmental and Social Policy (ESP, 2024), in particular Environmental and Social Requirement 10 (ESR10): Information Disclosure and Stakeholder Engagement and forms an integral part of the Project's Environmental and Social Assessment (ESA) and related environmental and social management instruments.

The Project aims to rehabilitate and improve the drinking water transmission and distribution systems within the provincial boundaries of Muğla in order to reduce non-revenue water losses, improve service efficiency and reliability, and enhance the sustainability and climate resilience of water supply infrastructure. Project activities include the rehabilitation of existing water networks, , and the procurement and installation of Supervisory Control and Data Acquisition (SCADA) systems and related monitoring and maintenance infrastructure. The Project investments are expected to contribute to improved water service quality, reduced water losses, increased operational efficiency and strengthened institutional capacity.

Stakeholder engagement is recognized as an inclusive and continuous process that will be carried out throughout the Project life cycle. The SEP supports the management of stakeholder expectations, contributes to risk mitigation, and helps to reduce potential conflicts and project delays through early, timely and open communication. In this context, the key objectives of the SEP are to:

- (i) establish a systematic and structured approach to stakeholder engagement consistent with EBRD requirements;
- (ii) identify stakeholders and assess their level of interest, influence and potential impact in relation to the Project, and ensure that stakeholder views are taken into account in Project design and environmental and social performance;
- (iii) ensure that relevant information on Project activities and associated environmental and social risks and impacts is disclosed in a timely, understandable and accessible manner;
- (iv) identify vulnerable or disadvantaged individuals and groups and define tailored engagement measures to facilitate their effective participation in the stakeholder engagement process; and
- (v) establish an accessible and inclusive **Grievance Mechanism** to enable project-affected parties and other stakeholders to submit suggestions and grievances, and to ensure that these are addressed and resolved in a timely and transparent manner by the Implementing Agency.

The SEP sets out MUSKI's strategy for engaging with stakeholders who may be affected by, or have an interest in, the Project throughout its implementation. It also describes the Grievance Mechanism to be established for the Project and MUSKI's approach to receiving, assessing, responding to and resolving stakeholder feedback and grievances. The SEP is a living document and will be updated as necessary to reflect stakeholder feedback, changes in Project design or implementation arrangements, and evolving stakeholder engagement needs. Currently, MUSKI does not have a specific formal procedure for



stakeholder consultation in the event of major project design or route changes. However, if significant changes occur that may affect stakeholders, additional information disclosure and consultations may be organized in line with the principles of this SEP.



2. PROJECT BACKGROUND

2.1 Project Development Objective

The Project will support the improvement and modernization of drinking water transmission and distribution systems within the provincial boundaries of Muğla by strengthening institutional, technical and operational capacity in key areas. These include the rehabilitation of aging water infrastructure, reduction of non-revenue water losses, enhancement of system monitoring and data management, and the adoption of efficient and climate-resilient water management practices. The Project investments are expected to contribute to improved service quality and reliability, increased resource efficiency, and strengthened resilience of water supply systems to climate-related risks.

The Project Development Objective is to enhance MUSKI's capacity to deliver sustainable, efficient and reliable drinking water services, reduce water losses, and improve the overall performance and climate resilience of water infrastructure in Muğla Province, in line with national priorities and the EBRD's environmental and social sustainability objectives.

2.2 Project Components

The Muğla Water Project will be implemented through four interrelated components, reflecting the investment scope defined by MUSKI and assessed under the EBRD-financed feasibility and due diligence process. The components are designed to address high non-revenue water (NRW) levels, aging infrastructure, and the need for improved monitoring and sustainable operation of drinking water systems across Muğla Province.

Component 1: Rehabilitation of Drinking Water Transmission and Distribution Networks

This component will finance the rehabilitation and renewal of existing drinking water transmission and distribution pipelines in selected areas of Muğla Province. The primary objective is to reduce physical water losses caused by aging and deteriorated infrastructure and to improve system reliability and service continuity.

Activities under this component include:

- replacement and rehabilitation of deteriorated transmission and distribution pipelines;
- associated civil works, including trenching, reinstatement and connection works;
- phased implementation of works to minimize service disruptions and ensure continuity of water supply; and
- implementation of traffic management and community safety measures during construction.

Construction-related environmental and social impacts under this component are expected to be temporary and site-specific and will be managed in accordance with EBRD Environmental and Social Requirements.

Component 2: Supervisory Control and Data Acquisition (SCADA) and System Monitoring

This component will finance the procurement, installation and commissioning of Supervisory Control and Data Acquisition (SCADA) systems and related monitoring equipment. The objective is to strengthen MUSKI's capacity for real-time monitoring, control and optimization of water supply operations.

Activities under this component include:

- installation of SCADA systems for monitoring flows, pressures and system performance;
- procurement of equipment and software to support regular system monitoring and maintenance;
- integration of SCADA with existing operational and asset management systems; and
- training of MUSKI staff to ensure effective operation and use of monitoring systems.

This component will enhance operational efficiency, support rapid response to system failures, and improve climate resilience through better system control and data-driven decision-making.

Component 3: Project Management, Implementation Support and Monitoring

This component will support overall Project management, coordination and monitoring functions required for effective implementation of the Project in line with EBRD requirements.

Activities under this component include:

- establishment and operation of a Project Implementation structure within MUSKI;
- coordination between MUSKI headquarters and provincial/district-level organizations;
- monitoring and reporting of Project progress and performance, including environmental and social compliance;
- implementation of stakeholder engagement activities and operation of the Grievance Mechanism; and
- monitoring and evaluation of Project outcomes, including NRW reduction and service quality improvements.

2.3 Implementation Arrangements

Overall responsibility for the implementation, management and coordination of the Muğla Water Project lies with the Muğla Water and Sewerage Administration (MUSKI) as the Implementing Agency. MUSKI will be responsible for ensuring that the Project is implemented in accordance with national legislation, the requirements of the EBRD Environmental and Social Policy (ESP, 2024), and the applicable Environmental and Social Requirements (ESRs), including ESR10 on Information Disclosure and Stakeholder Engagement.

Project implementation will be carried out through MUSKI's central (headquarters) organization and its provincial and district-level organizations, which will play a key role in the execution of field-level activities and engagement with local stakeholders. MUSKI headquarters will retain overall responsibility for strategic oversight, coordination, reporting to EBRD, and compliance with environmental and social requirements, while provincial and district units will support day-to-day implementation, local coordination and stakeholder engagement.



A Project Implementation Team (PIT) will be established within MUSKI to oversee the implementation of Project activities. The PIT will be responsible for coordinating technical implementation, procurement, financial management, environmental and social risk management, stakeholder engagement and grievance management. The PIT will include staff with responsibilities related to engineering, procurement, financial management, environmental management, social and stakeholder engagement, and occupational health and safety, with qualifications satisfactory to the EBRD.

Stakeholder engagement activities under the Project will be coordinated centrally by MUSKI headquarters, with active involvement of MUSKI's provincial and district organizations. These local units will be responsible for:

- communicating Project-related information to local communities and other stakeholders;
- supporting consultations at the local level;
- receiving and recording grievances through the Project Grievance Mechanism; and
- coordinating with contractors to ensure that stakeholder concerns are addressed in a timely and appropriate manner.

Contractors engaged under the Project will be required to comply with MUSKI's environmental and social requirements, including obligations related to stakeholder engagement, community health and safety, information disclosure and grievance handling. Contractors will support MUSKI in implementing site-specific engagement activities, under the supervision of MUSKI.

Contractors will be required, through contractual provisions, to comply with the requirements of the Stakeholder Engagement Plan and the Project Grievance Mechanism. Contractors will ensure that information about stakeholder engagement activities and grievance procedures is communicated to workers and relevant stakeholders. Compliance with these requirements will be monitored by the Project Implementation Unit during the construction phase.

Overall Project oversight will be provided by MUSKI's senior management, ensuring effective internal coordination between relevant departments and alignment of Project implementation with MUSKI's strategic objectives. The Project implementation arrangement is designed to ensure clear roles and responsibilities, effective communication between central and local levels, and meaningful engagement with stakeholders throughout the Project life cycle



Component – Impact – Engagement Matrix

Table 1 Component – Impact – Engagement Matrix

Project Component	Potential Environmental & Social Impacts	Affected / Interested Stakeholders	Engagement Objectives	Engagement Methods & Tools	Timing / Frequency	Responsible Entity
Component 1: Rehabilitation of Drinking Water Transmission and Distribution Networks	• Temporary access restrictions, • Noise, dust and vibration • Traffic disruptions • Temporary water supply interruptions • Community and worker health and safety risks	• Residents and households along pipeline routes • Local businesses • Vulnerable groups (elderly, women, persons with disabilities) • Muhtars • Municipal authorities	• Inform stakeholders in advance about construction schedules and impacts • Minimise disruption and manage expectations • Address local concerns promptly	• Public notices and leaflets • Meetings with muhtars • On-site information boards • Direct communication via provincial units • Grievance Mechanism	• Pre-construction • Throughout construction	• MUSKI Headquarters (oversight) • MUSKI Provincial/District Organisations • Contractors
Component 2: SCADA and System Monitoring	• Limited occupational health and safety risks during installation • Indirect impacts through improved service reliability	• MUSKI technical and operational staff • Contractors	• Ensure staff awareness and capacity • Promote effective use of monitoring systems	• Technical briefings • Training programmes • Internal coordination meetings	• During installation • Operation phase	• MUSKI Headquarters • System suppliers
Component 3: Project Management, Monitoring and	• Risk of stakeholder dissatisfaction if information is inadequate • Reputational risks	• All project-affected parties • Other interested stakeholders • Civil society organisations	• Ensure transparent and continuous engagement• • Provide accessible grievance resolution • Monitor and respond to stakeholder feedback	• Disclosure of SEP and NTS • Stakeholder consultations•	• Throughout Project life cycle	• MUSKI Headquarters (Implementing Agency)



Project Component	Potential Environmental & Social Impacts	Affected / Interested Stakeholders	Engagement Objectives	Engagement Methods & Tools	Timing / Frequency	Responsible Entity
	• Ineffective grievance handling	• Regulatory authorities		Grievance Mechanism operation • Periodic reporting		• MUSKI Provincial/District Organisations



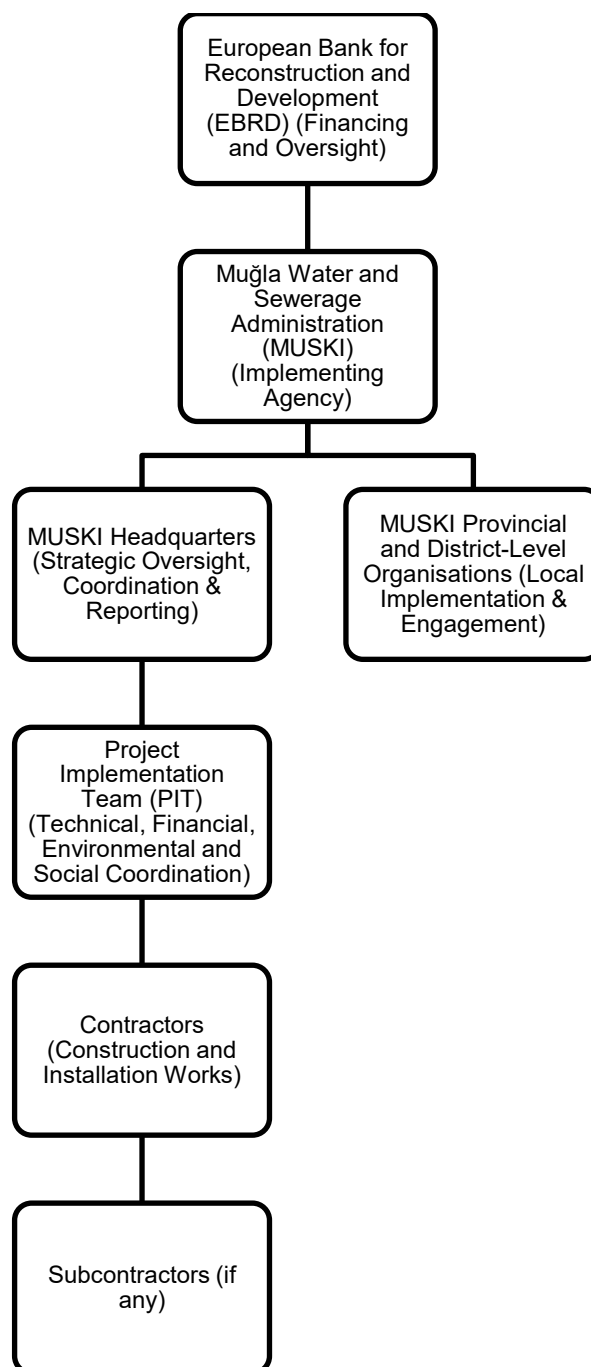


Figure 1 Project Implementation Arrangements

3. NATIONAL LEGISLATIONS AND ESR REQUIREMENTS

This section reviews the national legal framework in Türkiye relevant to stakeholder engagement and information disclosure, and the EBRD Environmental and Social Policy (ESP, 2024) requirements applicable to the Project, particularly Environmental and Social Requirement 10 (ESR10): Information Disclosure and Stakeholder Engagement.

3.1 National Legislations for Stakeholder Engagement

Constitution of the Republic of Türkiye

Stakeholder engagement and citizen participation principles are supported by constitutional provisions that enable individuals to express their views and seek remedies. In particular:

- Freedom of Thought and Opinion (Article 25) safeguards individuals from being compelled to disclose their thoughts and from being condemned due to opinions.
- Freedom of Expression and Dissemination of Thought (Article 26) recognises the right to express and disseminate opinions by speech, writing, images or other means, including the freedom to receive and impart information without official interference, subject to lawful limitations.
- Right to Petition (Article 74) provides citizens (and foreigners under the principle of reciprocity) the right to submit requests and complaints in writing to public authorities and the Grand National Assembly.

Presidency's Communication Center (CİMER)

CİMER is an official public channel for receiving requests, complaints and applications. It provides multiple submission routes (online platforms, hotline, post). Public institutions are required to respond within legally defined time limits in accordance with relevant implementing rules and the general administrative framework.

Right to Information Act (Law No. 4982)

Law No. 4982 regulates the right to information in line with principles of equality, impartiality and transparency. Public institutions are required to:

- take administrative and technical measures to provide access to information and documents (subject to legal exceptions), and
- evaluate and respond to applications promptly, effectively and accurately.

This law supports Project-level disclosure by reinforcing expectations for accessible and timely information provision through public bodies.

Law on the Exercise of the Right to Petition (Law No. 3071)

Law No. 3071 sets the procedural basis for submitting petitions and complaints to the competent authorities and the Turkish Grand National Assembly. It provides an enabling legal environment for grievance raising and formal complaint submission.



Environmental Impact Assessment (EIA) Regulation (Official Gazette No. 31907, dated 29.07.2022)

The EIA Regulation, issued under the Environmental Law framework, includes provisions on public information and participation where an EIA process is applicable. It requires public consultation mechanisms (e.g., public participation meetings) to inform and consult the public on projects, including requirements on location accessibility and advance public notification. While not all Project activities may trigger an EIA process, the Regulation provides an important national benchmark for public consultation practices.

3.2 International Legislation for Stakeholder Engagement

International Human Rights Framework

Türkiye's stakeholder engagement environment is also informed by internationally recognised human rights principles and instruments, including the Universal Declaration of Human Rights (UDHR) and related international human rights covenants. These instruments establish broad principles such as dignity, equality, non-discrimination, access to information, participation, and effective remedy—relevant for inclusive engagement and grievance handling.

EBRD ESR10 is aligned with the principles of the UNECE Aarhus Convention, which recognises access to information, public participation in environmental decision-making, and access to justice in environmental matters as fundamental rights. Consistent with this approach, the Project treats environmental and social information as a public good and ensures that stakeholders are informed and consulted in a transparent and inclusive manner.

EBRD Requirements

The Project will comply with the EBRD Environmental and Social Policy (ESP, 2024) and associated Environmental and Social Requirements (ESRs). Stakeholder engagement and information disclosure will be carried out in accordance with ESR10, which requires meaningful, inclusive and proportionate engagement throughout the Project life cycle.

Key ESR10-aligned requirements include:

- Early and ongoing engagement: engagement begins as early as possible and continues throughout implementation and operation, proportionate to Project risks and impacts.
- Meaningful consultation: stakeholders are consulted in a manner that is culturally appropriate and free from manipulation, coercion, intimidation or discrimination.
- Timely and accessible information disclosure: Project information especially on potential environmental and social risks/impacts and mitigation measures is provided in a timely, understandable and accessible manner, using appropriate channels and formats.
- Stakeholder identification and analysis: identification of project-affected parties and other interested parties, including vulnerable/disadvantaged groups, and application of tailored measures to enable their effective participation.
- Grievance Mechanism: establishment and operation of an accessible and inclusive Grievance Mechanism to receive and address complaints and suggestions in a timely fashion, with transparent procedures and feedback to complainants.
- Reporting back to stakeholders: communication of how stakeholder views have been considered and periodic reporting on engagement activities and grievance performance.



- Contractor alignment: where relevant, contractors are required to apply Project-level engagement and grievance requirements consistently with MUSKI's SEP arrangements and EBRD standards. Contractors and subcontractors engaged under the Project will be required, through contractual provisions, to implement stakeholder engagement and grievance procedures consistent with this SEP and EBRD ES10, including worker grievance mechanisms in line with ESR2.
- Proportionate and risk-based engagement: the nature, frequency and intensity of stakeholder engagement activities are scaled to the Project's environmental and social risks, sensitivity of the sector, and the level of public interest, in line with EBRD ESR10 requirements.

4. STAKEHOLDER ENGAGEMENT PROCESS

4.1 Stakeholder Identification

Stakeholder identification is a fundamental step in the effective planning and implementation of the stakeholder engagement process. It enables the Implementing Agency to identify all individuals and groups that may be affected by, or have an interest in, the Project and helps to reduce the risk of any stakeholder group exerting disproportionate influence over the engagement process. Stakeholder identification is undertaken at the earliest possible stage of the Project life cycle and is updated as Project details evolve.

For the Muğla Water Project, stakeholder identification has been carried out by MUSKI taking into account the nature of Project activities, their geographic scope, the potential environmental and social risks and impacts, and the institutional and social context at provincial and district levels. The process also considers the relationships and dynamics between different stakeholder groups, as well as the risks and opportunities associated with their engagement.

In line with EBRD Environmental and Social Requirement 10 (ESR10), Project stakeholders are classified into the following categories:

- Project-affected parties, referring to individuals or groups who are affected or are likely to be affected by the Project due to actual or potential impacts on their physical environment, access to services, health and safety, livelihoods, or overall well-being. This includes, among others, residents, businesses and water subscribers located in areas where rehabilitation works, meter installation or other Project activities will take place.
- Other interested parties, referring to individuals or groups who may have an interest in the Project because of its location, characteristics, impacts, or relevance to public interest. These may include local and metropolitan municipalities, regulatory authorities, public institutions, professional chambers, civil society organizations, academic institutions, media, and other relevant organizations.
- Vulnerable or disadvantaged individuals or groups, referring to individuals or groups who, due to their specific socio-economic characteristics or circumstances, may be disproportionately affected by the Project or may face barriers in accessing information and participating in stakeholder engagement activities. Such groups may include low-income households, women, elderly persons, persons with disabilities, seasonal populations, or other groups requiring tailored engagement measures.

The identification of appropriate engagement methods and the frequency of engagement for different stakeholder groups is based on the consideration of the following criteria:

- the extent and nature of potential impacts of the Project on the stakeholder group;
- the level of influence of the stakeholder group over Project outcomes; and
- culturally appropriate and accessible engagement and information disclosure methods.

In general, the intensity and frequency of engagement increase in proportion to the level of impact and influence. Stakeholder groups that are more significantly affected by the Project, or that have greater influence over Project implementation, are engaged more frequently and through more direct and interactive methods.



The indicative list of stakeholders presented in Table 2 has been developed at the Project level. This list will be reviewed, refined and updated as necessary during Project implementation and, where applicable, during the preparation of any site-specific or activity-specific stakeholder engagement arrangements. MUSKI, through its headquarters and provincial and district-level organizations, will engage with different stakeholder groups according to their roles, responsibilities, interests and level of influence.

Table 2 Component- Stakeholder Category Matrix

Component	Stakeholder Category	Stakeholders	Level of Interest	Level of Influence
Component 1: Rehabilitation of Drinking Water Transmission and Distribution Networks	Project-Affected Parties	- Residents living along pipeline routes - Local households and water subscribers - Local businesses and shop owners - Road users and pedestrians	High	Medium
	Other Interested Parties	- MUSKI Provincial and District Organizations - Metropolitan and district municipalities - Muhtars - Contractors and subcontractors - Traffic authorities	High	High
	Vulnerable/Disadvantaged Individuals/Groups	- Elderly persons - Persons with disabilities - Low-income households - Women-headed households	Medium	Low
Component 2: SCADA and System Monitoring	Project-Affected Parties	- MUSKI operational and technical staff - Control room operators	Medium	Medium
	Other Interested Parties	- System suppliers and service providers - Contractors and technical consultants	Medium	High
	Vulnerable/Disadvantaged Individuals/Groups	Not applicable (no direct community-level impacts identified)	Low	Low
Component 3: Project Management, Monitoring and Stakeholder Engagement	Project-Affected Parties	- All project-affected communities - Water subscribers across Muğla Province	Medium	Medium
	Other Interested Parties	- EBRD - Regulatory authorities - Civil society organisations - Media	Medium	High
	Vulnerable/Disadvantaged Individuals/Groups	Vulnerable groups identified under Components 1 and 2	Medium	Low

4.2 Stakeholder Engagement

Stakeholder engagement is a continuous and inclusive process that will be implemented throughout the life cycle of the Muğla Water Project. When appropriately designed and implemented, stakeholder engagement supports the establishment of constructive, transparent and responsive relationships between MUSKI and its stakeholders, which are essential for the effective management of the Project's environmental and social risks and impacts. Stakeholder engagement is most effective when initiated at the early stages of project development and integrated into Project decision-making, as well as into the assessment, management and monitoring of environmental and social risks and impacts.

In line with the EBRD Environmental and Social Policy (ESP, 2024) and Environmental and Social Requirement 10 (ESR10), the Project applies the principle of meaningful consultation. Accordingly, stakeholder engagement activities will be conducted in a manner that is free from manipulation,



interference, coercion or intimidation, and will ensure the provision of timely, relevant, understandable and accessible information through culturally appropriate methods. The engagement process facilitates two-way communication and provides stakeholders with opportunities to express their views, raise suggestions and submit grievances, and ensures that stakeholder feedback is considered in Project planning and implementation.

The Project will aim to maintain transparency in stakeholder engagement by communicating how stakeholder feedback has been considered during project implementation. Where appropriate, summary information describing stakeholder concerns and the corresponding actions taken by the Project Implementation Unit may be disclosed through project communication channels.

This approach, often referred to as “**You Said – We Did,**” helps demonstrate how stakeholder input contributes to project decision-making and supports continuous improvement of engagement activities throughout the project lifecycle.

For the Project, stakeholder engagement activities will commence as early as possible and will continue throughout all Project phases, including pre-construction, construction and operation. The content, scope and frequency of engagement activities will vary depending on the nature, scale and location of Project components and activities, as well as the level of potential environmental and social risks and impacts.

Tourism activities in Muğla Province are generally concentrated between **May and October**. Stakeholder engagement activities and construction-related communications will take into account the seasonal increase in population and tourism activities during this period, particularly in districts where tourism intensity is high.

Stakeholders will be informed about the Project through a range of communication channels coordinated by MUSKI. These will include stakeholder consultation meetings, on-site information boards, MUSKI's official website and social media accounts, and other appropriate communication tools. Information disclosed to stakeholders will cover, as relevant:

- i. the objectives, scope and key technical characteristics of the Project and its components;
- ii. the Grievance Mechanism, including contact details of designated focal points; and
- iii. the availability and location of publicly disclosed Project-related documents.

Disclosed information will include, as appropriate, the purpose, nature and scale of the Project; its anticipated timeline; potential environmental and social risks and impacts; proposed mitigation measures; stakeholder engagement opportunities; and the functioning of the Project Grievance Mechanism. Information will be disclosed in Turkish and, where relevant, in formats accessible to vulnerable or disadvantaged groups.

The Project will operationalise the above principles through the following actions:

- providing advance information to communities and key stakeholders on Project activities and implementation schedules;
- encouraging meaningful participation of stakeholders in engagement activities;
- actively listening to stakeholder feedback, assessing suggestions and incorporating them into Project decisions where feasible;
- ensuring transparency and equal access to Project information;
- using appropriate, clear and non-discriminatory communication, including gender-sensitive language;



- ensuring the inclusion of vulnerable and disadvantaged groups, such as women, elderly persons, persons with disabilities and low-income households, through tailored engagement measures;
- applying user-friendly and accessible participation tools; and
- using multiple communication channels to reach different stakeholder groups effectively.

MUSKI recognizes that openness, active listening and ensuring that stakeholders understand the nature, timing and potential impacts of Project activities are essential for building trust and maintaining effective relationships with affected communities. This approach will support the early identification and management of concerns, help minimize adverse impacts, and contribute to the overall success and sustainability of the Project.

4.2.1 Overview of Stakeholder Engagement Methods

The stakeholder engagement methods to be applied under the Muğla Water Project are designed to promote transparency, sustain stakeholder ownership, and raise awareness of the Project's environmental and social impacts throughout the Project life cycle. Engagement methods will be selected and applied in a manner proportionate to the nature, scale and potential impacts of Project activities, in line with the EBRD Environmental and Social Policy (ESP, 2024) and Environmental and Social Requirement 10 (ESR10).

Formal Meetings

Formal meetings will include internal coordination meetings within MUSKI, as well as meetings with relevant public institutions, local authorities, and other organizations involved in or affected by Project implementation. These meetings will support coordination, information exchange and alignment of Project activities during preparation and implementation phases. Stakeholder engagement meetings may also be organized, as appropriate, to address specific Project-related issues.

Project Launch and Completion Meetings

Multi-stakeholder meetings will be organized at key milestones of the Project life cycle, including Project launch and, where appropriate, Project completion. These meetings will aim to introduce the Project, disseminate information on planned activities and expected outcomes, and share overall Project results with stakeholders.

Disclosure Meetings

Disclosure meetings will be organized to inform stakeholders about the environmental and social instruments prepared for the Project, including the SEP, NTS and any other relevant environmental and social documentation required under EBRD standards. Information on these instruments will also be made publicly available through MUSKI's official website and other appropriate channels. In addition to online disclosure, environmental and social documents may also be made physically accessible at appropriate public locations. These may include:

- MUSKI Headquarters
- Relevant district municipality buildings
- Muhtar offices
- MUSKI Operations – 3rd Regional Directorate building



Where disclosure meetings are conducted through digital platforms, stakeholders will be provided with opportunities to submit feedback through official correspondence, electronic communication channels or online feedback mechanisms. Environmental and social instruments prepared for the Project are living documents and may be updated to reflect changes in Project design, implementation arrangements or stakeholder feedback.

Consultation Meetings

Consultation meetings will be organized to inform stakeholders about the scope, timing and potential impacts of Project activities and to seek feedback from project-affected parties, including vulnerable or disadvantaged groups. Stakeholder information meetings may be organized depending on project needs and implementation stages, such as:

- Prior to construction
- During construction where necessary
- During operation if relevant

As a general practice, stakeholders may be informed at least 3 days in advance before planned meetings or important project activities.

These meetings may involve local communities, water subscribers, businesses, local authorities, civil society organizations and other relevant stakeholders. Meeting records, including participant lists and summaries of issues raised, will be documented.

Workshops and Training Activities

Workshops and training activities will be organized, as relevant, to strengthen capacity and awareness among target stakeholder groups, including MUSKI staff, contractors, and other stakeholders involved in Project implementation. These activities will support effective implementation of Project investments and promote good environmental, social and occupational health and safety practices.

Digital Communication Tools

Digital and mass communication tools will be used to disseminate information on Project progress and key developments. These may include MUSKI's official website, social media accounts, SMS notifications, local and national media, and other appropriate communication channels. Planned water interruptions are currently communicated through MUSKI's Call Center Voice Response System, which automatically provides information to callers regarding planned service interruptions. These tools will complement face-to-face engagement and support wider outreach, particularly where physical meetings are not feasible.

As an illustration of its existing institutional communication capacity, MUSKI makes use of corporate communication and public information activities routinely implemented by its Press, Media and Public Relations Department. In 2024, these activities included 135 meetings with external institutions, 2 press statements and live broadcasts, 22 opening and foundation-laying ceremonies, 368 scheduled and 194 unscheduled visitor receptions, 8 visits to public institutions and civil society organizations, participation in 3 meetings with muhtars and local communities, and 157 official correspondence processes. These activities are presented as indicative examples of MUSKI's established engagement and communication

practices and may continue to be utilized, as relevant, to support information disclosure, stakeholder engagement and communication under the Project during SEP implementation.

Grievance Mechanism

An accessible and inclusive GM will be established and operated by MUSKI in accordance with EBRD ESR10 requirements. The GM will provide Project stakeholders with multiple channels to submit complaints, concerns and suggestions related to Project activities. A designated GM focal point within MUSKI will be responsible for overseeing the operation of the mechanism, coordinating grievance handling across MUSKI's central and local units, and monitoring and reporting on grievance resolution. The Project Grievance Mechanism will not impede access to judicial or administrative remedies and will operate at no cost to complainants, in accordance with EBRD ESR10.

Information Disclosure and Communication Materials

Project-related information will be disclosed through MUSKI's official communication channels. Where appropriate, information materials such as brochures, leaflets or posters may be developed to support stakeholder awareness of Project activities, engagement opportunities and grievance procedures.

Announcements related to meetings or consultation activities will be made sufficiently in advance through appropriate communication channels. The timing, location and format of engagement activities will be planned to ensure accessibility and effective participation of all relevant stakeholder groups, including vulnerable and disadvantaged individuals. To ensure meaningful participation, stakeholders will be informed in advance about consultation meetings and engagement activities. As a general principle, a minimum notice period of at least 7 days will be provided prior to scheduled meetings or public consultations. Notifications will be communicated through appropriate channels such as municipal websites, local announcements, social media platforms, and where relevant, through muhtar offices.

In cases where urgent communication is required (e.g., construction-related disturbances or temporary service interruptions), stakeholders will be informed as early as possible through the available communication channels.

4.2.2 Disadvantaged/Vulnerable Individuals/Groups

It is essential to identify and understand whether Project impacts may disproportionately affect disadvantaged or vulnerable individuals or groups who may have limited capacity to access information, express their views or benefit from Project activities. In line with EBRD ESR10, MUSKI will give particular attention to ensuring that stakeholder engagement activities are inclusive and that vulnerable or disadvantaged groups are able to participate meaningfully in the engagement process.

Stakeholder engagement and information disclosure activities will be designed and implemented taking into account the specific needs, constraints and cultural sensitivities of vulnerable or disadvantaged individuals and groups. Where necessary, tailored engagement measures and additional assistance will be provided to ensure that these groups are adequately informed about Project activities, potential impacts and benefits, and available grievance channels, and that their views are considered in Project decision-making.

For the purposes of the Muğla Water Project, vulnerable or disadvantaged individuals and groups may include, but are not limited to:



- women, particularly women-headed households and women with limited access to information;
- elderly persons;
- persons with disabilities;
- low-income households;
- individuals with limited literacy or digital literacy; and
- seasonal or temporary populations, including migrant workers and non-native Turkish speakers.

In addition, the call-centre / Flexcity records indicate that service-related grievances are also raised by rural neighbourhoods. For example, in the extract shared, the most frequent topics reported from Ula rural neighbourhoods were water burst/repair (4) and water outage (2) (total 6); and from Marmaris rural neighbourhoods were water burst/repair (20), water outage (6), septic truck request (5) and sewer overflow/blockage (2) (total 35). These patterns will be considered when planning targeted engagement and information dissemination for rural and hard-to-reach settlements.

To facilitate the effective participation of vulnerable or disadvantaged groups, MUSKI will consider and apply the following engagement measures, as appropriate:

Women: Women will be encouraged to participate in consultation meetings and engagement activities. Where necessary, separate or targeted consultation sessions (e.g. small group discussions) will be organized to ensure that women are able to express their views freely. Communication and engagement approaches will be gender-sensitive and inclusive.

Individuals with limited literacy or digital literacy: Information and communication materials will be prepared in simple, non-technical language and, where appropriate, supplemented with visual tools such as infographics or videos. Support will be provided by MUSKI's provincial and district organizations to facilitate access to information and participation in engagement activities, including access to the Grievance Mechanism.

People with disabilities: Engagement activities will be organized in accessible venues and formats. Where required, reasonable accommodation measures, such as accessible meeting locations or alternative communication formats, will be considered to enable participation.

Elderly people: Additional support will be provided to elderly stakeholders, particularly where engagement relies on digital communication tools. Face-to-face communication or other appropriate methods will be used to ensure that elderly individuals are able to understand Project activities and participate effectively.

Seasonal populations and non-native Turkish speakers: Where relevant, consideration will be given to providing information in languages other than Turkish or using alternative communication methods to facilitate understanding and engagement.

In addition, MUSKI will seek to:

- engage with local organizations, community representatives or civil society organizations that work with or represent vulnerable or disadvantaged groups;
- conduct targeted or separate consultations for groups with specific accessibility needs where necessary;

- ensure that consultation locations and formats are accessible to vulnerable or disadvantaged individuals; and
- ensure that written and printed Project-related materials are culturally appropriate, easy to understand and accessible.

Where Project activities are implemented through specific sites or phases, any site-specific or activity-specific stakeholder engagement arrangements will incorporate considerations related to vulnerable or disadvantaged groups and gender aspects, consistent with this SEP.

4.2.3 Citizen Engagement

The Project will develop and implement a Citizen Engagement (CE) approach aimed at ensuring regular, meaningful and structured feedback from citizens and Project beneficiaries throughout the Project life cycle. Citizen engagement will be integrated into Project implementation arrangements and aligned with the requirements of the EBRD Environmental and Social Policy (ESP, 2024) and Environmental and Social Requirement 10 (ESR10).

The citizen engagement approach will enable MUSKI to actively solicit feedback from water users, affected communities and other relevant stakeholders through multiple and accessible channels. Engagement mechanisms will be designed to capture feedback not only on Project activities and impacts, but also on the effectiveness of stakeholder engagement and grievance processes themselves. Citizen engagement activities will be implemented in a manner proportionate to the nature and scale of Project components and will be adjusted, as necessary, based on stakeholder feedback and Project progress.

Citizen engagement mechanisms will be applied across Project components, as outlined below:

- **Component 1 – Rehabilitation of Drinking Water Transmission and Distribution Networks:**

Engagement with residents, water subscribers and local businesses will be carried out to inform construction planning, sequencing of works and mitigation measures. Feedback from citizens will be used to identify local concerns related to access, service interruptions, traffic and safety, and to refine implementation approaches at the neighbourhood level. Engagement will be facilitated through meetings with muhtars, targeted consultations and direct communication channels coordinated by MUSKI's provincial and district organizations.

- **Component 2 – SCADA and System Monitoring:**

While this component has limited direct community interaction, feedback from water users related to service reliability, response times and system performance will be considered as part of MUSKI's monitoring and performance improvement processes. Engagement with operational staff will support the effective use of monitoring systems and responsiveness to citizen feedback.

- **Component 3 – Project Management, Monitoring and Evaluation:**

Citizen engagement will be supported through systematic collection and analysis of stakeholder feedback, including periodic reviews of grievances received and resolved, and, where appropriate, beneficiary feedback surveys to assess satisfaction with service improvements and Project implementation. Results of these feedback mechanisms will inform adaptive management and continuous improvement of Project activities.



In addition, MUSKI will conduct information and awareness activities to ensure that citizens are informed about Project objectives, implementation timelines, participation opportunities and grievance channels. These activities will also communicate how stakeholder feedback has been considered and, where relevant, has influenced Project decisions or implementation adjustments.

Capacity building activities may be undertaken within MUSKI to strengthen staff awareness and skills related to citizen engagement, communication with stakeholders and responsiveness to beneficiary needs. This will support consistent application of the citizen engagement approach across MUSKI's central and local units.

Through the above measures, the Project aims to foster transparency, accountability and trust between MUSKI and citizens, and to ensure that citizen feedback contributes meaningfully to the successful implementation and sustainability of the Project.

4.2.4 Overview of Stakeholder Engagement Program

In the light of information given in the previous paragraphs, the summary of the stakeholder engagement program is given in Table 3.



Table 3 Stakeholder Engagement Program and Information Disclosure Plan

Project Phase	Consultation Subject / Message to be Delivered	List of Information to be Disclosed	Method Used	Target Stakeholders	Frequency	Responsible Party
Preparation	• Inform stakeholders about the objectives, scope and rationale of the Project • Consult stakeholders on Project design, sequencing of works and implementation approach • Inform stakeholders about potential environmental and social risks and impacts • Explain proposed mitigation measures • Introduce the Grievance Mechanism (GM) and contact points • Seek stakeholder feedback	• Project concept, scope and components • EBRD Environmental & Social principles and obligations (ESP 2024) • Stakeholder Engagement Plan (SEP) and Non-Technical Summary (NTS) • GM procedures and contact details	• Opening / disclosure meetings • Public announcements • Non-technical summaries and presentations • MUSKI official website and social media • Electronic publications • Consultation meetings (face-to-face / virtual) • Digital communication tools • Grievance Mechanism • Posters, brochures, leaflets • SMS notifications	• Project-Affected Parties • Other Interested Parties • Disadvantaged / Vulnerable Individuals and Groups	• Prior to commencement of Project and component activities	• MUSKI Headquarters (Implementing Agency) • MUSKI Provincial and District Organisations
Implementation & Construction	• Inform stakeholders about ongoing Project and construction activities • Notify stakeholders about construction schedules, temporary service interruptions, traffic and access arrangements • Inform stakeholders about site-specific environmental and social risks and mitigation measures • Operate and publicise the GM	• Site-specific ESMPs (where applicable) • Updated SEP (if required) • GM procedures and updates • Regular information on Project progress and schedules	• Public announcements • On-site information boards • MUSKI website and social media • Press releases • Non-technical summaries and presentations • Consultation meetings (face-to-face / virtual) • Direct communication via	• Project-Affected Parties • Other Interested Parties • Disadvantaged / Vulnerable Individuals and Groups	• Prior to start of construction activities • Throughout construction, as needed	• MUSKI Headquarters • MUSKI Provincial and District Organisations • Contractors



Project Phase	Consultation Subject / Message to be Delivered	List of Information to be Disclosed	Method Used	Target Stakeholders	Frequency	Responsible Party
	• Seek and respond to stakeholder feedback		provincial/district units • Digital communication tools • Grievance Mechanism • Posters, brochures, leaflets • SMS notifications			
Operation	• Inform stakeholders about Project outcomes, service improvements and operational arrangements • Receive and address feedback and grievances • Communicate grievance resolution outcomes	• Project outputs and results • GM performance and grievance redress outcomes	• Closing or disclosure meetings (as appropriate) • Consultation meetings • MUSKI website and social media • Digital communication tools • Posters, brochures, leaflets • SMS notifications	• Project-Affected Parties • Other Interested Parties • Disadvantaged / Vulnerable Individuals and Groups	• After completion of Project activities and during operation	• MUSKI Headquarters • MUSKI Provincial and District Organisations



4.3 Implementation of SEP and Evaluation of Stakeholder Feedback

The implementation of the SEP will be carried out throughout the life cycle of the Muğla Water Project in a manner proportionate to the nature, scale and potential environmental and social risks and impacts of Project activities. The duration and scope of consultation periods will be defined in accordance with the stakeholder category and the purpose of the engagement. As a general principle, stakeholders will be provided with a reasonable period to submit questions, comments or feedback, taking into account the applicable engagement method and the context of the consultation.

During stakeholder engagement and consultation activities, MUSKI will ensure that:

- Participant records are maintained, including information such as location, stakeholder category and preferred communication channel. Participation will be voluntary, and stakeholders will be informed that they may choose to remain anonymous and are not obliged to disclose personal or contact details.
- All engagement activities are appropriately documented, including the date and location of the engagement, the engagement method used, a summary of information disclosed, key issues raised by stakeholders, questions and feedback received, and responses provided.
- Opportunities for confidential feedback are provided, where appropriate, to allow stakeholders to submit comments or questions in a manner they consider comfortable, including through written feedback forms or alternative channels.

Continuous feedback received from stakeholders during Project implementation will be reviewed by MUSKI and used to inform Project management and, where necessary, to identify and implement corrective or adaptive measures to support effective Project implementation. Stakeholders will be informed, during engagement activities, of the available communication channels for submitting feedback or grievances, including the Project Grievance Mechanism, MUSKI's official communication platforms and other designated contact points.

In addition to consultation meetings, the Project GM will be available throughout the Project life cycle to receive and address complaints, concerns and suggestions from both internal and external stakeholders. The GM will be operated in accordance with EBRD ESR10 requirements and will provide clear procedures for submission, assessment, response and resolution of grievances in a timely and transparent manner.

Citizen engagement activities, including mechanisms for collecting feedback on service delivery and stakeholder satisfaction, will complement formal consultation and grievance processes. Information obtained through these channels will be systematically reviewed and, where relevant, incorporated into Project decision-making, monitoring and reporting.

Through the consistent implementation of the SEP and the effective evaluation of stakeholder feedback, MUSKI aims to enhance transparency, responsiveness and accountability, and to ensure that stakeholder engagement contributes meaningfully to the successful and sustainable implementation of the Project. Stakeholder feedback received through consultations, public meetings, surveys, and the Grievance Mechanism will be reviewed by the Project Implementation Unit (PIU). The PIU will assess whether the feedback requires adjustments to project activities, communication methods, or mitigation measures. Where relevant and feasible, stakeholder input will be incorporated into project implementation processes.



To enhance transparency, summary information on stakeholder feedback and the actions taken in response may be periodically disclosed as part of project communication activities.

4.4 Disclosure of E&S Documents and Stakeholder Consultation

The draft E&S documents prepared for the Muğla Water Project, including the Stakeholder Engagement Plan (SEP) and other relevant supporting documents, were disclosed in a manner consistent with the EBRD ESP 2024 and ESR10. Non-technical information was made available in Turkish to ensure accessibility for project-affected parties and other interested stakeholders, while full versions of the documents were made available in English for institutional stakeholders and the EBRD. The disclosed documents were published on MUSKI's official communication channels, including its corporate website, and were made accessible to the public prior to the commencement of key project activities. Stakeholders were informed about the disclosure through digital communication tools and official announcements.

Stakeholder consultations were carried out to inform relevant stakeholders about the Project objectives, scope, components and anticipated environmental and social risks and impacts, as well as the proposed mitigation measures and the Project Grievance Mechanism. Where necessary, consultations were conducted through virtual platforms to ensure accessibility and continuity of engagement. The consultation meetings commenced with presentations delivered by MUSKI representatives and environmental and social specialists involved in the preparation of the Project's E&S documentation. These presentations introduced the Project scope, implementation approach and key E&S instruments. Following the presentations, stakeholders were invited to share their views, questions and recommendations. During the consultations, stakeholders provided feedback on various aspects of the Project, including:

- the sequencing and coordination of infrastructure investments,
- technical considerations related to water infrastructure rehabilitation and non-revenue water reduction,
- the importance of coordination with local authorities and metropolitan municipalities,
- the need for reliable data collection, monitoring and information-sharing systems,
- the role of academic institutions, professional associations and civil society organizations in supporting technical design, implementation and capacity building.

Representatives from MUSKI's relevant technical units provided clarifications on component-specific activities and implementation arrangements during the meetings. Stakeholders were also informed that they could submit written comments through designated communication channels within a specified period following the consultation meetings.

All feedback received during the consultation process was documented and reviewed by MUSKI. Where relevant, stakeholder recommendations were reflected in the refinement of the stakeholder identification and engagement approach and will be taken into consideration during the design and implementation of Project activities. Issues raised by stakeholders will also be addressed, as appropriate, in site-specific environmental and social instruments to be prepared during Project implementation.

MUSKI will continue to conduct stakeholder engagement and consultation activities throughout the Project life cycle. Ongoing engagement will ensure that stakeholders remain informed about Project



progress and that their feedback is considered in decision-making processes, in line with the principles of transparency, inclusiveness and meaningful consultation under EBRD ESR10.



5. INSTITUTIONAL ARRANGEMENTS

This section describes the institutional arrangements for the implementation of the Stakeholder Engagement Plan (SEP) as part of the overall management and implementation structure of the Muğla Water Project.

Overall responsibility for the implementation of the Project, including compliance with the EBRD ESP 2024 and ESR10, will rest with Muğla Water and Sewerage Administration (MUSKI), acting as the Implementing Agency.

Table 4 Responsibilities of the Key Actors in SEP Implementation

Key Actors	Responsibilities
Project Implementation Unit (PIU) / Project Implementation Team (PIT)	• Ensure overall coordination and implementation of Project activities in line with the Project Implementation Arrangements (see Figure 1). • Coordinate technical, environmental and social aspects of Project implementation, including stakeholder engagement activities. • Ensure integration of stakeholder engagement and grievance management into Project planning, implementation and monitoring processes. • Coordinate with MUSKI headquarters and provincial/district-level organisations to support local-level engagement and grievance handling. • Oversee contractors' compliance with Project-level environmental, social and stakeholder engagement requirements. • Consolidate inputs from relevant MUSKI units and contractors for Project progress reporting, including SEP implementation and grievance performance, and submit reports to MUSKI senior management and the EBRD.
Stakeholder Engagement Specialist (SEP Specialist)	• Lead the implementation of the Stakeholder Engagement Plan (SEP) in accordance with EBRD Environmental and Social Policy (ESP, 2024) and ESR10, as defined within the Project Implementation Arrangements (Figure 1). • Plan, coordinate and implement stakeholder engagement activities across all Project phases, in close cooperation with the PIU/PIT and MUSKI provincial and district organisations. • Coordinate the preparation and dissemination of stakeholder communication and disclosure materials (e.g. brochures, leaflets, posters, website and digital content). • Manage the Project Grievance Mechanism, including receipt, registration, tracking, coordination of responses with relevant MUSKI units, and timely resolution of grievances. • Ensure that feedback from stakeholders, including vulnerable or disadvantaged groups, is systematically documented, analysed and integrated into Project management and decision-making processes where relevant. • Organise and facilitate consultation meetings, disclosure events and targeted engagement activities. • Monitor and report on the effectiveness of stakeholder engagement and grievance management activities, and provide recommendations for continuous improvement as part of Project monitoring and reporting to the EBRD.

5.1 Coordination and Oversight

All staff involved in the implementation of the Stakeholder Engagement Plan (SEP) will operate under the overall coordination and oversight of MUSKI Headquarters, in line with the Project Implementation Arrangements presented in Figure 1. Day-to-day coordination of SEP-related activities will be carried out through the Project Implementation Unit / Project Implementation Team (PIU/PIT), in close cooperation



with MUSKI's provincial and district-level organizations and the designated Stakeholder Engagement Specialist (SEP Specialist).

Clear internal communication and reporting lines will be established between MUSKI headquarters, the PIU/PIT, provincial and district organizations, and contractors to ensure that stakeholder feedback, concerns and grievances received at the local level are promptly communicated to the central Project team and addressed in a timely and coordinated manner. The SEP Specialist will support this process by ensuring systematic documentation, tracking and analysis of stakeholder engagement activities and grievance records, and by facilitating coordination among relevant MUSKI units.

The institutional arrangements for SEP implementation are designed to ensure that:

- stakeholder engagement activities are implemented in a structured, inclusive and transparent manner, proportionate to the Project's environmental and social risks and impacts;
- stakeholder feedback and grievances are consistently recorded, reviewed and, where relevant, integrated into Project management and decision-making processes through the PIU/PIT; and
- compliance with the EBRD Environmental and Social Policy (ESP, 2024) and ESR10 requirements is maintained throughout Project preparation, implementation and operation.

The organizational structure supporting SEP implementation, including the roles of the PIU/PIT and the SEP Specialist as defined in the Project Implementation Arrangements, will be maintained for the duration of the Project and may be adjusted, where necessary, in consultation with the EBRD, to respond to Project needs or lessons learned during implementation.

The costs associated with the implementation of Stakeholder Engagement Plan (SEP) activities for the Muğla Water Project will be covered under the overall Project budget as well as MUSKI's institutional resources allocated for project implementation. The SEP-related costs include expenditures associated with stakeholder engagement, information disclosure, communication and visibility activities, operation of the Grievance Mechanism, and capacity building for MUSKI staff and relevant stakeholders.

6. GRIEVANCE MECHANISM

This section describes the grievance mechanisms (GMs) available at national, institutional and project levels to receive, assess and resolve concerns and complaints related to the Project in a timely, transparent and culturally appropriate manner. The Grievance Mechanism has been designed in line with EBRD Performance Requirement 10 and national legislation, and will be accessible to all stakeholders, including disadvantaged and vulnerable groups.

6.1 Existing GMs

6.1.1 GM at National Level

At the national level, stakeholders may submit grievances through existing public grievance and information systems of the Republic of Türkiye, which remain available throughout the Project lifecycle. These mechanisms operate independently from the Project GM and do not restrict access to judicial or administrative remedies.

Key national mechanisms include:

- **CİMER (Presidency's Communication Center)**
 - Website: <https://www.cimer.gov.tr>
 - Hotline: 150
 - E-Government portal (e-Devlet)
 - Written applications

Applications submitted via CİMER are forwarded to the relevant public institution (including MUSKİ, if applicable) and must be responded to within legally defined timeframes.

6.1.2 GM at Institutional Level (MUSKİ)

MUSKİ has an established institutional complaint-handling system through which citizens and service users may submit requests, complaints and suggestions related to water and wastewater services.

Existing MUSKİ grievance channels include:

- MUSKİ official website (online application/complaint forms <https://www.muski.gov.tr/iletisim>)
- Call center and telephone hotline (185)
- Written petitions submitted to MUSKİ service units
- E-mail communication
- Face-to-face applications at MUSKİ service points
- MUSKİ's official social media accounts, including Instagram ("muskibasin") and Facebook pages, which are used as complementary communication channels for receiving citizen feedback and directing grievances to the appropriate institutional mechanisms

For the Project, these existing mechanisms will continue to function; however, Project-related grievances will be tracked separately within the Project Grievance Registry to ensure compliance with EBRD requirements.



Based on the MUSKI call-centre and Flexcity complaint management system operated by the Press, Media and Public Relations Department, institutional grievances are categorised and monitored. Indicative records show that the most frequently reported issues include water outages (5,541), water pipe bursts and repairs (3,719), sewer overflows and blockages (1,413), pressure-related problems (919), and septic truck requests (588). While resolution time varies depending on the nature and scale of the complaint, the average closure period is approximately seven working days, depending on complexity. For the Project, a designated SEP Specialist will be responsible for collecting, registering, monitoring and managing all Project-related grievances within the Project Grievance Mechanism, ensuring systematic tracking, timely resolution, coordination with relevant MUSKI units, and regular reporting in line with EBRD ESR10 requirements.

6.2 GMs at Project Level

6.2.1 Project GM

A Project-specific Grievance Mechanism will be established and operated by MUSKI for the EBRD-financed Project. The Project GM will enable all project-affected parties and other interested stakeholders to submit complaints, concerns, suggestions, or feedback related to environmental, social, technical or administrative aspects of the Project.

Core Principles

The Project GM will be:

- Accessible, free of charge and easy to use
- Transparent and confidential
- Culturally appropriate and gender-sensitive
- Free from retaliation, intimidation or discrimination

Entry Points (Web-based priority)

Priority will be given to web-based channels, complemented by alternative options to ensure inclusivity:

Primary Channel

- Dedicated Project Webpage (MUSKI website)
 - Online grievance submission form
 - Project GM procedures and timelines
 - Contact details of GM focal points

Additional Channels

- Dedicated Project e-mail address
- Telephone hotline (+90 252 185 00 00)
- Written applications submitted to MUSKI offices (info@muski.gov.tr / muski@hs01.kep.tr)
- Face-to-face submissions during stakeholder meetings
- Official correspondence
- MUSKI's official social media accounts (Instagram: muskibasin; Facebook), which will be used as supplementary channels to receive stakeholder messages and redirect Project-related grievances to the formal Project Grievance Mechanism



Grievances may be submitted anonymously if the complainant prefers.

GM Process

1. Receipt & Registration

All grievances are logged in a Project GM database.

2. Acknowledgement

Acknowledgement is provided within 3 calendar days.

3. Assessment & Investigation

Relevant MUSKI units review the grievance.

4. Response & Resolution

A response is provided within 7 calendar days, unless additional time is required.

5. Closure & Feedback

Complainant is informed of the outcome and closure.

Unresolved grievances may be escalated to higher administrative levels or national mechanisms.

6.2.2 Workers' Grievance Mechanism

The Worker Grievance Mechanism will allow workers to submit grievances anonymously in order to ensure that concerns can be raised without fear of retaliation. Anonymous submissions will be recorded and assessed in the same manner as other grievances. All grievances received through the mechanism will be registered, reviewed, and addressed within the timelines defined under the grievance management procedure.

A separate Workers' Grievance Mechanism will be established for:

- Direct MUSKI project staff
- Contractor and subcontractor workers

This mechanism will comply with EBRD ESR2 and Turkish Labour Law.

Workers may submit grievances related to:

- Working conditions
- Occupational health and safety
- Wages and working hours
- Discrimination or harassment

Workers' GM channels include:

- Site-level grievance boxes
- Designated OHS or HR focal people
- E-mail and phone contact points
- Written submissions

Contractor workers will have access to the same Worker Grievance Mechanism established by MUSKI for its employees. Contractors will be contractually required to inform their workers about the existence



and use of the mechanism during induction and regular toolbox meetings. All grievances raised by contractor workers will be recorded and managed through MUSKI's central grievance system to ensure equal treatment with grievances raised by the Client's employees. All workers will be informed about this mechanism during induction and toolbox meetings.

6.3 Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

The Project adopts a zero-tolerance approach toward SEA/SH. SEA/SH-related grievances will be handled through confidential, survivor-centered procedures, ensuring privacy, safety and non-retaliation.

Key measures include:

- Dedicated and confidential reporting channels
- Trained focal points within MUSKI
- Referral to appropriate support services when required
- No requirement for survivors to provide evidence

SEA/SH cases will not be disclosed publicly and will be handled with strict confidentiality. SEA/SH complaints may be submitted confidentially and will be handled under a separate procedure.

6.4 EBRD's Grievance Redress System

All EBRD-financed projects are required to be designed and implemented in compliance with the EBRD Environmental and Social Policy, which sets out ten Environmental and Social Requirements (ESRs) addressing core environmental and social sustainability areas. Compliance with these requirements, including ESR10 on Information Disclosure and Stakeholder Engagement, is mandatory throughout the project life cycle.

In addition, the EBRD operates the Independent Project Accountability Mechanism (IPAM), which serves as an independent recourse mechanism for project-affected people and civil society organizations. IPAM aims to support the resolution of environmental, social and information disclosure concerns related to EBRD-financed projects through dialogue and problem-solving among relevant stakeholders. Where necessary, IPAM also assesses whether the EBRD has complied with its Environmental and Social Policy and the project-specific provisions of the Access to Information Policy and may address instances of non-compliance while helping to prevent similar issues in the future.

In addition to Project GM, stakeholders may submit complaints directly to the EBRD Project Complaint Mechanism (PCM) if they believe that harm has occurred or may occur due to EBRD-financed activities.

Information on EBRD PCM will be disclosed on:

- MUSKI Project webpage
- Stakeholder information materials

Submission to the EBRD PCM does not preclude access to other grievance channels or legal remedies.



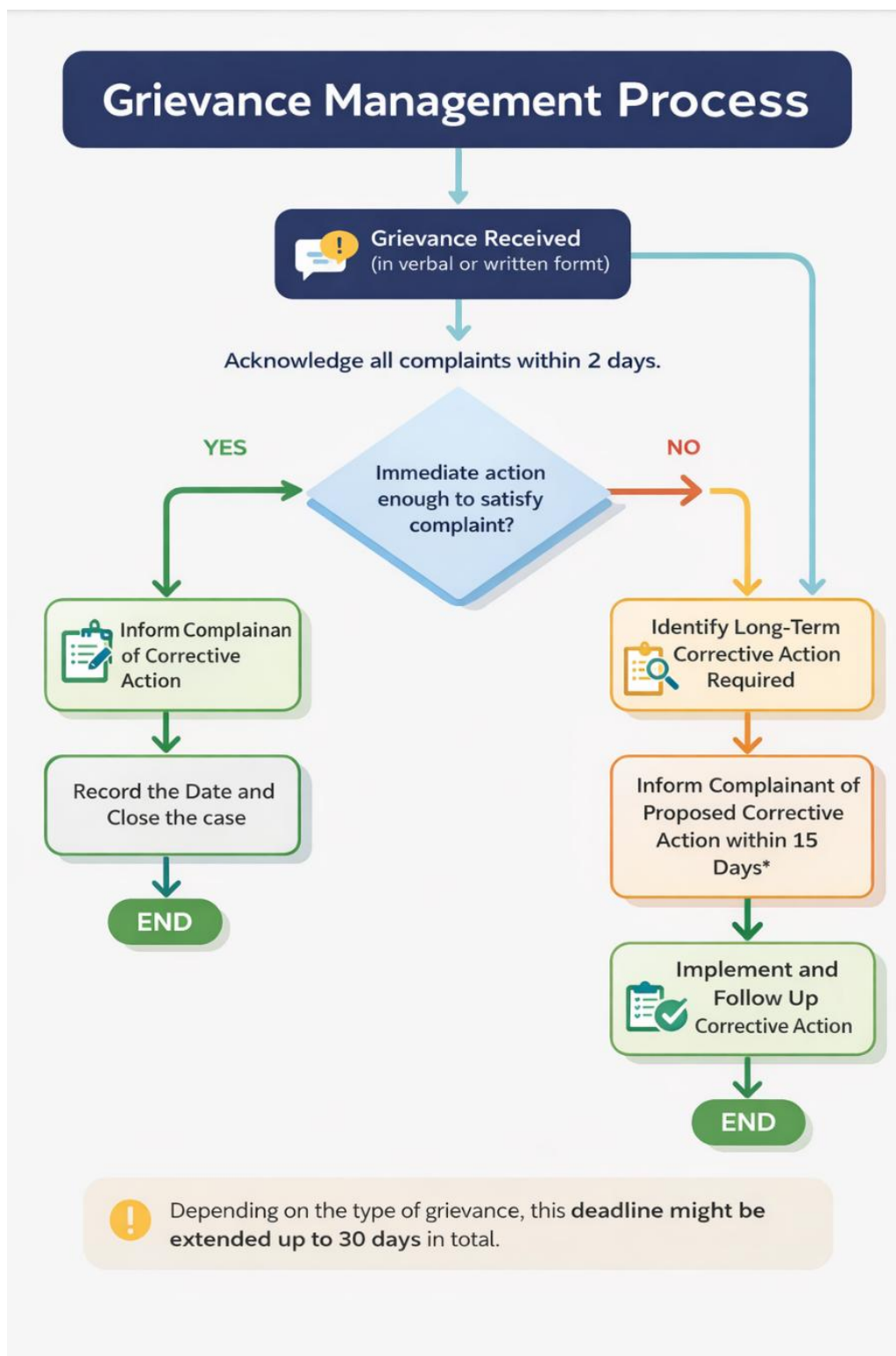


Figure 2 Grievance Management Process

7. MONITORING AND REPORTING

Stakeholder engagement activities under the Muğla Water Project will be systematically monitored and reported throughout the Project life cycle in accordance with the EBRD Environmental and Social Policy (ESP 2024) and ESR10.

Monitoring of Stakeholder Engagement Activities

MUSKİ will monitor the implementation of the Stakeholder Engagement Plan (SEP) on a continuous basis to ensure that stakeholder engagement activities are carried out as planned, are effective, and remain proportionate to the Project's environmental and social risks and impacts.

Monitoring will be coordinated by MUSKİ's central Project team, with inputs from relevant technical units and provincial/district organizations involved in Project implementation. Records and documentation related to stakeholder engagement activities will be maintained in MUSKİ's Project archives in both electronic and hard-copy formats, as appropriate.

To assess the effectiveness of stakeholder engagement activities, the Project will monitor several performance indicators. These may include:

- Number of consultation meetings held
- Number of participants attending these meetings
- Number of grievances received and resolved through the grievance mechanism
- Stakeholder satisfaction where feasible

These indicators will be periodically reviewed by the Project Implementation Unit to improve engagement practices throughout the project lifecycle.

Reporting

Information on stakeholder engagement activities will be included in biannual Project Progress Reports submitted to the EBRD. These reports will provide an overview of SEP implementation and key stakeholder engagement outcomes. The reporting will include, but not be limited to, the following information:

- Number and type of stakeholder engagement and consultation activities conducted (e.g. public meetings, focus group discussions, disclosure meetings),
- Number of participants, disaggregated by stakeholder category (project-affected parties, other interested parties, vulnerable/disadvantaged groups, where applicable),
- Key issues, concerns and topics raised during consultations and how these have been addressed or considered in Project decision-making,
- Summary of information disclosed to stakeholders,
- Status of implementation of planned stakeholder engagement activities.

Grievance Mechanism Reporting

Information on the functioning of the Project Grievance Mechanism will also be included in the Project Progress Reports. This will cover:

- Number of grievances received during the reporting period,



- Grievances disaggregated, where feasible, by gender, location (province/district), type of grievance and stakeholder category,
- Status of grievances (e.g. resolved, pending, under review),
- Average time for grievance resolution,
- Any recurring issues or trends identified and corrective actions taken.

Adaptive Management

Findings from monitoring and reporting activities will be used by MUSKİ to improve the effectiveness of stakeholder engagement and grievance management processes. Where necessary, the SEP will be updated to reflect changes in Project design, stakeholder composition, or lessons learned during implementation, in consultation with the EBRD.

Through regular monitoring and transparent reporting, MUSKİ aims to ensure accountability, responsiveness and continuous improvement in stakeholder engagement throughout the Project.



Appendix A Participant List of Consultation Meeting

Note: *The participant list of the consultation meeting will be added to this Annex following the disclosure and completion of the consultation process, in accordance with the EBRD Environmental and Social Policy (ESP, 2024) and Environmental and Social Requirement 10 (ESR10).*



Appendix B Grievance Form

GRIEVANCE FORM			
Reference No (to be filled by institution)			
Personal Information <i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information. Personal information will be used to identify if there exist special circumstances with respect to your grievance and it will be stored and processed according to Personal Data Protection Law No. 6698. You can choose to fill partly or not to fill</i>			
Full Name			
Province		District	
Neighborhood/Village		Locality	
Preferred way of communication , (Please provide your contact details: mail address, e-mail address, telephone number, etc. in you would like to be informed about the resolution process, actions to be taken)			
Grievance			
Your proposal for solution (if any)			
Signature		Date	



Appendix C Grievance Closeout Form

GRIEVANCE CLOSEOUT FORM	
Grievance closeout number:	
Reference No of the Grievance	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	[] YES [] NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
Decision Rationale / Explanation:	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and/or his/her complaint has been remediated.

Full Name	Signature
Date	

Of the Complainant:

Full Name	Signature
Date	

This mechanism does not prevent access to judicial or administrative remedies.



Appendix D Stakeholder Engagement Log

MUSKI 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	Concerns raised by stakeholders, if any	Notes



Appendix E MUSKİ Commitment Letter



T.C.
MUĞLA SU VE KANALİZASYON İDARESİ GENEL
MÜDÜRLÜĞÜ



KAZARA HASARLARA İLİŞKİN TAZMİN PROSEDÜRÜNE DAİR TAAHHÜT

Muğla Su ve Kanalizasyon İdaresi Genel Müdürlüğü (MUSKİ), Avrupa İmar ve Kalkınma Bankası (EBRD) tarafından finanse edilen Muğla Su Projesi kapsamında yürütülmesi planlanan faaliyetler çerçevesinde ortaya çıkabilecek çevresel ve sosyal etkilerin yönetilmesine yönelik sorumluluklarını kabul etmektedir.

Bu kapsamda MUSKİ, proje uygulaması sırasında meydana gelebilecek kazara hasarların yönetilmesi ve giderilmesine yönelik bir tazmin prosedürü geliştirmeyi ve uygulamayı taahhüt etmektedir.

Söz konusu prosedür kapsamında;

- Proje faaliyetlerinin yürütüldüğü alanlara yakın konumda bulunan mülklerde meydana gelebilecek kazara hasarların,
 - Proje faaliyetlerinden etkilenebilecek gayriresmî arazi kullanıcılarının (örneğin tarımsal kullanıcılar veya yol kenarı satıcıları) uğrayabileceği zararların,
- proje güzergahlarının denetimi, tespiti, kayıt altına alınması, değerlendirilmesi ve uygun şekilde giderilmesine yönelik süreçler tanımlanacaktır.

MUSKİ, bu kapsamda meydana gelebilecek hasarların adil, şeffaf ve zamanında değerlendirilmesini ve giderilmesini sağlayacak bir prosedürün uygulanmasını beyan ve taahhüt etmektedir.

Bu taahhüt, EBRD tarafından finanse edilen Muğla Su Projesi kapsamında uygulanacak Çevresel ve Sosyal Eylem Planı (Environmental and Social Action Plan – ESAP) hükümleri doğrultusunda yerine getirilecektir.


Yılmaz ŞENGÜL
Genel Müdür