

TURKEY
HATAY METROPOLITAN MUNICIPALITY
HATAY WATER AND SEWERAGE
ADMINISTRATION (HATSU)

STAKEHOLDER ENGAGEMENT PLAN FOR
HATSU WATER AND SEWERAGE PROJECT IN
SAMANDAG AND ARSUZ DISTRICTS

April 2018

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ACRONYMS AND ABBREVIATIONS

EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
HATSU	Hatay Water and Sewerage Administration
NGO	Non-Governmental Organisation
PIP	Priority Investment Programme

1 INTRODUCTION

1.1 Background

This document is the Stakeholder Engagement Plan (SEP) of Hatay Water and Sewerage Administration (HATSU) for the rehabilitation of the water supply system in the district of Samandag and implementation of a sewerage system in the district of Arsuz district of Hatay Province in Turkey. This plan presents the specific stakeholder engagement activities that HATSU will undertake in relation to realisation of the two projects and is available in Turkish, Arabic and English languages.

1.2 Objectives of the Plan

The overall objective of the Stakeholder Engagement Plan (SEP) is to define a stakeholder engagement, public information disclosure and consultation process for the water supply and sewerage project. This SEP highlights the way HATSU plans to communicate with people and stakeholder groups who may be affected by or interested in HATSU's construction and operations phase activities. The end goal is to build a trusting relationship with people who live in the project areas and other interested stakeholders based on a transparent and timely supply of information and an open dialogue. The SEP and the process defined therein are a means to this end. It also includes a grievance mechanism for stakeholders and the public to raise any concerns, and to provide feedback and comments about HATSU's operations and how those complaints/comments will be handled.

1.3 Scope of the Plan

The SEP focuses on engagement of all relevant stakeholders in the project which includes rehabilitation of the water supply system in Samandag district and construction of a sewerage system in the district of Arsuz and the subsequent operations.

The SEP takes into account best international practice in relation to information disclosure and outlines the general engagement principles that HATSU will adopt and those which will be used for future investment programmes. The SEP will be reviewed and updated on a regular basis. If activities change or new activities relating to stakeholder engagement commence, the SEP will be brought up to date and shared with project stakeholders.

1.4 Contents of the Plan

In addition to this introductory chapter, this document includes the following chapters:

- Chapter 2: Description and Context of Proposed Project
- Chapter 3: Overview of HATSU and Responsibility in Implementation of the SEP
- Chapter 4: Regulatory Requirements
- Chapter 5: Other Requirements
- Chapter 6: Summary of Previous Stakeholder Engagement Activities
- Chapter 7: Identification of Stakeholders and Communication Methods
- Chapter 8: Disclosure of Information during Design & Construction Phase
- Chapter 9: Stakeholder Engagement Programme
- Chapter 10: Public Grievance Mechanism
- Chapter 11: Contact Information

2 DESCRIPTION AND CONTEXT OF PROPOSED PROJECT

HATSU plans to initiate rehabilitation of the water supply system in the district of Samandag and construction of a sewerage system in the district of Arsuz and approached the European Bank of Reconstruction and Development, EBRD, with a request to provide finance for these projects. A preparatory project study was carried out in 2017 and resulted in a Priority Investment Programme (PIP).

This Stakeholder Engagement Plan relates to the design and construction activities of the proposed EBRD-supported PIP, which will be implemented from 2018-2022, and to the subsequent operations. The PIP is summarised below.

Table 1: Contents of PIP

Geographical Area	Description
<p>Samandag district – within the following quarters:</p> <ul style="list-style-type: none"> • Cemal Gürsel, • Çiğdede, • Cumhuriyet, • Deniz, • Kurtderesi, • Şükrü Kanatlı, • Yeni Mah and • Yeşilada • Small parts of neighbouring quarter(s) (3,000 persons) 	<p>Improved water supply with replacement of approximately 200 km water supply network pipes and construction of approximately 7,700 house connections.</p>
<p>Arsuz district – within the following quarters:</p> <ul style="list-style-type: none"> • Karaağaç, • Nardüzü, • Karahüseyinli, • Çırtıman, • Kışla, • Gözcüler, • Uluçınar • Madenli • Üçgüllük • Gülcihan 	<p>Construction of a sewerage system, with 232 km of sewerage network pipelines, 117 km of pipes and manholes for parcel connections, and construction of sixteen pumping stations.</p>

The following are the main social benefits of the project: In Samandag, the residents can rely on a safer water supply for the foreseeable future with a significant reduction in water supply cuts and an improved water quality. This will in turn have an impact on health issues caused by water and sanitation related diseases. In Arsuz, the residents will benefit from an improved physical environment and an improved management of wastewater disposal. This will in turn have an impact on health issues caused by water and sanitation related diseases. Further, it is expected that the improved wastewater collection will have a positive impact on the tourism potential in the coastal area and thus on local income during the summer.

There will not be any involuntary resettlement caused by the project and not any acquisition of private land for the project. In the unlikely event that, during the finalisation of project design, the situation changes, much effort will be put into making agreements with private land owners to voluntarily sell the required land.

The construction of the proposed project will be located in urban areas and will not directly impact on areas of biodiversity significance, and it is not expected to lead to any increase in the abstraction of water. Conversely, due to the reduction of water losses and non-revenue water (NRW), the projects are expected to reduce the abstraction.

The main environmental benefit of the proposed project is linked to the investments in Arsuz as it will mitigate the problem with no wastewater collection and treatment. This will significantly reduce the discharge of wastewater from leaching septic tanks or to the river. The project will alleviate the problem of pollution of the groundwater which is the main drinking water source.

3 OVERVIEW OF HATSU AND ITS RESPONSIBILITY IN IMPLEMENTATION OF THIS SEP

HATSU is responsible for water and wastewater services in 15 districts of Hatay, which has a population of around 1.6 million. HATSU is a public legal entity with an autonomous budget and organizational structure, fully owned by the Hatay Metropolitan Municipality. Hatay has recently experienced significant population growth caused by the Syrian refugee influx given its close proximity to the Syrian border.



Figure 1: Hatay is located in southern Turkey, bordering to Syria.

HATSU established and started its operations in April 2014 under the Law No. 6360 dated 12 November 2012, while the authority and responsibilities of HATSU are regulated by Law No. 2560 and related regulations. In addition, many legal arrangements directly or indirectly relating to local administrative institutions also affect HATSU.

The water and sewerage services in Hatay are going through a transition period after HATSU became responsible for providing services to all areas of Hatay Province in 2014. This has involved transfer of water and wastewater responsibilities, assets, historical billing and accounting data, and staff from district administrations to HATSU.

HATSU General Directorate is overall responsible for implementing the investments included in the PIP and management. In line with this, HATSU General Directorate is responsible for the implementation of stakeholder engagement and communication activities during the construction phase and the subsequent operations.

During the construction phase, a Stakeholder Engagement Committee composed of the project related units (Managers of the Customer Department, Studies and Planning Department, Projects Department, and the Water and the Wastewater Departments on provincial and district level, the Press Unit and the 185 Hotline Unit) will be established. The HATSU General Directorate and the HATSU Hotline Unit Manager are aware of the need to strengthen the Hotline Unit, so it has sufficient staff adequately trained in two-way communication. The Committee will also be responsible for stakeholder engagement and communication activities during operations.

4 REGULATORY REQUIREMENTS

The scale and scope of the proposed project components do not require an Environmental Impact Assessment (EIA) according to the national EIA Regulation (published in the Official Gazette No. 29186, dated 25 November 2014). The procedures for public consultation and disclosure of information, as stipulated in the EIA Regulation, do therefore not apply to the proposed investments.

However, the public has the right to receive information and complain about the progress and applications of projects, as set out in the Right of Information Act No. 4982, dated 09.10.2003. The Act is related to the activities of public institutions and organizations as well as professional organizations with public institution status. Applicants have to be granted, or denied, access to the requested information or documents within 15-30 business days. The Act also contains public grievance procedures in case access is denied.

For the infrastructure projects in Samandag and Arsuz districts, HATSU is required to put a summary of environmental and social information in the public domain and to hold public consultations. This will be done in close cooperation with Hatay Metropolitan Municipality.

5 OTHER REQUIREMENTS

EBRD's Performance Requirement on Information Disclosure and Stakeholder Engagement is to be fulfilled. The current Stakeholder Engagement Plan is formulated in accordance with this.

Details on the mentioned Performance Requirement is included in EBRD's Environmental and Social Policy, which can be found on: <http://www.ebrd.com/environmental-and-social-policy.html>

The key operational principles of effective stakeholder engagement for projects are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;

- Clear mechanisms for responding to people’s concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders.

General Stakeholder Communication Records Maintenance:

Communication records will be maintained by the related project department at HATSU, specifically through the Community Liaison Managers, who will be the Head of the Studies and Projects Department for Arsuz and the Head of the Projects Department for Samandag. Records will be maintained of communication activities in relation to various stakeholder groups and of key incoming communications (i.e. general questions, complaints, etc.) and the response to these.

Stakeholder engagement activities conducted by contractors and complaints received by the contractors will also be recorded and reported to HATSU on daily basis to be included into the HATSU’s stakeholder engagement and complaint tracker.

6 SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 HATSU

HATSU disseminates information through various channels, primarily through the social media, HATSU’s web page, (<http://www.hatsu.gov.tr/index.php>), and the mass media. This is mainly on its ongoing rehabilitation works, its project plans and events organized by the General Manager of HATSU. Different social media (Facebook, Twitter, and Instagram) are used to communicate with customers. Social media is used for both receiving opinions and complaints of the public and for making announcements and news regarding HATSU’s activities. In September 2017, the HATSU Facebook page thus reportedly had 26,600 followers, while the webpage had around 75,000 visits per week. HATSU projects and announcements are reported as news on local radio and national radio channels almost every day as prime-time news.

The General Manager of HATSU regularly visits each district and has “general consultation” meetings with the local leaders (mukhtars). The purpose of these meetings is both to get advices from the mukhtars and to provide information about planned and ongoing projects. News and pictures from the meetings are brought in the local press, on the internet media and on HATSU’s website. The mukhtars can visit the General Directorate of HATSU whenever they wish to express any complaint and problem.

Normally, HATSU does not organise public consultation meetings before the start of major rehabilitation work, but channels information through local leaders and receives feed-back through them.

Posters, billboards and leaflets are used for campaigns related to HATSU’s big projects and investments. The contents of these materials are prepared by the Press Department, while the graphic design works are done by the experts of the Municipality. The leaflets provide information on topics such as water saving, illegal water usage, the function of hotline and the lower water tariff for the poor.

Customer complaints are mainly reported through HATSU’s telephone hotline. The 185 hotline operates during normal working hours, while complaints received at night and at weekends are through the helpdesk of the Directorate of Public Relations of the Metropolitan Municipality. The plan is to employ more call centre staff and provide them with training on conflict management and effective communication.

Residents, businesses and institutions can contact the HATSU with requests, complaints etc. by letter (Mehmet Kafadar Caddesi No:3 Antakya/Hatay,31100), phone (+9 0326 212 43 33/35), e-mail: (bilgi@hatsu.gov.tr), fax (+9 0326 212 58 88).

As part of the preparatory study for the project, three focus group discussions were conducted in September 2017 with the participation of muhtars, other local leaders and NGO representatives. Generally, participants found the information received from HATSU useful. However, many emphasised that they would like more information on topics like ongoing and future HATSU projects, the rationale for the tariff setting and the time and duration of water supply interruptions.

6.2 Hatay Metropolitan Municipality

Hatay Metropolitan Municipality's main contacts to its residents are through the helpdesk (White Desk) of its Public Relation Directorate. It receives a few water and wastewater related inquiries and complaints (in person or e-mails), which are redirected to HATSU's hotline for action.

The Mayor organises meetings in the districts with participation of local leaders to inform about important issues and to listen to their problems. These include water and wastewater related issues.

Moreover, a bi-monthly bulletin is available to the public in the municipal building free of charge. This includes news on the services, activities and events of the Municipality, including on HATSU's infrastructure works. The Municipality also posts information about its services as well as news about new projects and events on its web page (<http://www.hatay.bel.tr/default.aspx>). These include new projects to improve the water and wastewater infrastructure within the province.

Residents, businesses and institutions can contact the Hatay Metropolitan Municipality with requests, complaints etc. by letter (Cumhuriyet Mahallesi, Adnan Menderes Cd. No:4, 31000 Antakya/Hatay, Türkiye), e-mail: (iletisim@hatay.bel.tr), telephone, (+9 326 214 91 90) and fax (+9 326 214 9199).

7 IDENTIFICATION OF STAKEHOLDERS AND COMMUNICATION METHODS

The main stakeholders are the population (including both the local Turkish and the Syrian population), organisations, commercial and industrial enterprises within the project areas in Samandag and Arsuz districts. The mass media, local organisations such as the trade chambers, the university, women's and youth associations and other related NGOs at provincial and in Samandag and Arsuz districts are other important stakeholders. These are listed under external stakeholders in Appendix 1 to this document.

The Municipal Council, departments within Hatay Metropolitan Municipality and municipal enterprises as well as HATSU staff also need to be kept informed. These are listed under internal stakeholders in Appendix 1.

To the extent possible, the methods of communication suggested by participants in focus group meetings of the preparatory project study will be used during the construction period and during HATSU's future operations, namely:

- Community meetings with HATSU staff;
- Announcement of the grievance procedure to public;
- Periodical meeting between HATSU's local unit managers and muhtars;
- Social media;
- Announcements by SMS.

Project information will also continue to be placed on the HATSU and the Hatay Metropolitan Municipality websites and be publicised via social media and in the local mass media. The production and distribution of leaflets will continue. Their contents will also be highlighted at public meetings, particularly as in the past leaflets did not reach all household or they did not read them due to their literacy level.

Other communication channels may be identified. Particular efforts will be made to ensure that poor people within the project areas are reached with communication activities and that both local and Syrian women and men receive information, are consulted and have access to the grievance mechanism (e.g. through the hotline). As women often have the main responsibilities within their families for their water supply and for disposal of wastewater, HATSU will put much effort into ensuring that both local and Syrian women participate in public consultations before and during project implementation and have access to the grievance mechanism.

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

8 DISCLOSURE OF INFORMATION DURING DESIGN & CONSTRUCTION PHASE

Before the construction works start, HATSU will provide information to the citizens in the project areas and other stakeholders. The main contents of this information are outlined in table 2 below.

Detailed information will be distributed in the two project districts, Samandag and Arsuz, while more general information will be made available to the public in all Hatay province.

The initial information will be distributed through the webpages of HATSU and the Hatay Metropolitan Municipality, social media, press releases, billboards, posters, brochures and Hatay Metropolitan Municipality's bi-monthly "Hatay" magazine with contents similar to those outlined in the table below. Information on the project, the time schedule, and opportunities for public comments will also be posted in local newspapers in Turkish and Arabic languages. In addition, information will be available upon request.

Table 2: Outline Contents of Project Information

Headings	Outline content
Main organisation	<p>HATSU is responsible for the design and construction activities and for stakeholder engagement and communication activities during the design and construction phase.</p> <p>HATSU is also responsible for operation and management of the water supply and wastewater facilities and for stakeholder engagement and communication during operations.</p>
Project description and areas	<p>Samandag district Improved water supply with replacement of approximately 200 km water network pipes and construction of approximately 7,700 house connections</p> <p>Project areas are within the following quarters:</p> <ul style="list-style-type: none"> • Cemal Gürsel, • Çiğdede, • Cumhuriyet, • Deniz, • Kurtderesi, • Şükrü Kanatlı, • Yeni Mah and

Headings	Outline content
	<ul style="list-style-type: none"> • Yeşilada • Small parts of neighbouring quarter(s) (3,000 persons) <p>Arsuz district Construction of a sewerage system, with more than 200 km of sewerage network pipelines, approximately 100 km of pipe and manholes for parcel connections, and construction of six pumping stations.</p> <p>Project areas are within the following quarters:</p> <ul style="list-style-type: none"> • Karaağaç, • Nardüzü, • Karahüseyinli, • Çırtıman, • Kışla, • Gözcüler, • Uluçınar • Madenli • Üçgüllük • Gülcihan
Time frames	2018-2022
City areas to benefit / be affected	Arsuz and Samandag districts of Hatay province (see quarters above)
Opportunities and benefits	<p>The main benefits</p> <ul style="list-style-type: none"> • Improved water supply and wastewater services • Improved quality of the environment • Improved health of the population • Improved living conditions
Impacts during construction as a consequence of project activities and expected notification of mitigation actions to be applied	<p>Temporary traffic disruptions and interruption of water supply:</p> <ul style="list-style-type: none"> • Announcements and signs for temporary diversion of the traffic • Announcements on required access to houses and buildings for installation of house connections • Announcements on temporary interruptions of the water supply
Announcement of planned public consultations before the construction works begin	<p>A description of the public consultation process in the context of the project, including:</p> <ul style="list-style-type: none"> • Place and time of the public consultations in the project areas in Samandag and Arsuz districts (exact location and time to be decided later) • Time frame: 2 weeks for provision of comments, complaints and proposals from the public • Time frame: 1 month for authorities to react and consider complaints and proposals
General grievance procedure during construction	<ul style="list-style-type: none"> • Description of the grievance procedure • Organisation to contact: Establishing a Stakeholder Engagement Committee within HATSU General Directorate where complaints can be addressed and replied: HATSU General Directorate Attention: Mehmet Kafadar Street No:3 Antakya/Hatay, Hatay 31100 Telephone: (0326) 212 43 33 / 35 Fax: 0326 212 58 88 E-mail: bilgi@hatsu.gov.tr
Local and site-specific information	Local information will be distributed through the Stakeholder Engagement Committee representatives from HATSU's Head Office and its District Directorates for local and site-specific information.

The table below shows how information will be disclosed.

Table 3: Means of Disclosing Information

Institution Responsible	Means of Information Disclosure	Target groups
HATSU General Directorate	<ul style="list-style-type: none"> • Brochure with contents as described in the previous table, in both Turkish and Arabic • Billboards on main streets, posters in public bus stations and public institutions which citizens frequently visit in Hatay city and project districts with visual materials and similar contents as the brochure • Announcement in local newspapers, HATSU and Hatay Metropolitan Municipality webpages and in social media, in Turkish and possibly Arabic, with the same overall contents as in the brochure and other written materials. 	Internal and external stakeholders and the general public.
HATSU General Directorate Stakeholder Engagement Committee through the HATSU District Directorates and municipal departments	<ul style="list-style-type: none"> • Dissemination of billboards, posters and brochures • Information through meetings and household visits • Response to local inquiries 	Local and Syrian women and men in all parts of the project areas and from all socio-economic groups
HATSU General Directorate through the HATSU District Directorates and municipal departments	<p>Notification of streets in the neighbourhood at the beginning of construction works:</p> <ul style="list-style-type: none"> • Reminder of traffic changes and parking restrictions in streets where works will commence and the time schedule for the works • Contact telephone number for HATSU General Directorate for emergencies or grievances to be posted close to works sites 	Local and Syrian residents, organisations and businesses
HATSU General Directorate Stakeholder Engagement Committee	<ul style="list-style-type: none"> • Overall contact point for information during implementation of the project and on request distributor of information on the progress of work as described in approved reports and minutes of meetings • During construction, responsible for structured responses to grievances (see section on grievance procedures) 	All stakeholders

9 STAKEHOLDER ENGAGEMENT PROGRAMME

9.1 Public Consultation prior to and during Construction

It is anticipated that two public meetings will be held, with one meeting in each of the project areas of Samandag and Arsuz districts. The specific dates and places for the public meetings, with presentation of details of the project, will be decided before the construction activities begin. In addition, special meetings will be arranged with local and refugee women at the mukhtars' offices. All consultations will be arranged with the purpose of giving local and Syrian residents and other stakeholder groups opportunities to be informed about the sub-projects and provide feedback before construction starts. At all consultation meetings, all types of project-related questions and proposals can be raised, including on tariffs.

Relevant information will be compiled in hand-outs and distributed through the responsible persons in HATSU's District Directorates, who will be appointed by the Community Liaison Managers, and through the district municipalities of Samandag and Arsuz. Information will also be available on request.

The conclusions of the public meetings and the meetings in the mukhtars' offices will be agreed during the meetings and recorded. In addition, the public will have two weeks after the date of the consultation to provide written comments to the planned activities.

HATSU General Directorate has two weeks after the consultation meetings to assess and clarify the eligibility of all concerns raised and recorded from the consultation process. All justified comments and concerns will be evaluated and mitigation measures will be taken into consideration to be implemented before construction activities begin. At the end of the consultation process, a summary explanation note of all relevant issues raised will be prepared and distributed to muhtars and other local leaders, including explanations of the implementation methods during the construction phase.

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

Table 4: Pre-construction Public Consultation Process and Outputs

Required Activities	Specifications	Means of Communication and Outputs
Announcement of the public hearings	<ul style="list-style-type: none"> Location, date and time are announced two times at least one week in advance of the meeting Information is provided to muhtars 	<ul style="list-style-type: none"> Announcements by SMS to muhtars Announcements at muhtars' offices and at HATSU district directorates Muhtars will provide information to local and Syrian residents with loud speakers in Turkish and Arabic Teachers in schools will participate in the announcement of the meetings and will particularly encourage local and refugee women to participate in meetings at the mukhtars' offices
Holding public meetings and encouraging comments to the planned project construction works	<ul style="list-style-type: none"> Meetings and discussions are arranged Comments and concerns are recorded for the eligibility assessment 	<ul style="list-style-type: none"> Questions and concerns from the public are recorded
Preparation and	<ul style="list-style-type: none"> HATSU General Directorate prepares a 	<ul style="list-style-type: none"> Summary explanation report

Required Activities	Specifications	Means of Communication and Outputs
distribution of explanations and related mitigation measures to comments & questions received during the consultation process	summary explanation on planning activities and mitigation measures report <ul style="list-style-type: none"> • Deadline for reporting (2 weeks after the consultation) 	available at the offices of the HATSU district directorates, muhtars' offices as well as on HATSU and Hatay Metropolitan Municipality websites.

9.2 Stakeholder Engagement and Communication during the Operations Phase

As mentioned earlier, three focus group discussions were conducted as part of the preparatory study for the project. Participants in these mentioned that they would like more information from HATSU, which is reflected in the following key topics for HATSU's communication and consultations during operations:

- Interruptions to the water supply, including reasons and the expected duration;
- Problems with the sewerage system, including reasons;
- Scope of the works and the expected duration;
- Results of the water quality monitoring;
- The rationale for tariff setting, both for water supply and sewerage;
- The application procedures for poor households to pay a lower tariff (HATSU applies a lower water supply tariff, 50% of the full tariff, for poor households certified by Social Assistance and Solidarity Foundation);
- The mechanism for complaints.

To the extent possible, the methods of communication suggested by participants in the focus group discussions during the preparatory study will be used during HATSU's future operations. These are included in the communication methods listed below:

- More efficient operation of HATSU's 185 hotline;
- Community meetings with HATSU staff;
- Periodical meeting between HATSU's local unit managers and muhtars;
- Leaflets;
- Announcements by SMS;
- HATSU's website;
- Social media;
- Mass media.

10 PUBLIC GRIEVANCE MECHANISM

10.1 Public Grievance Mechanism during Construction Phase

For the purposes of this project, the HATSU General Directorate will establish a specific grievance mechanism for any concerns and complaints to be handled in a systematic way. A Stakeholder Engagement Committee will be established in line with HATSU's existing customer relations organisation. During the consultation meetings, committee representatives will introduce themselves and their contact information will be available in project disclosure notes. Efforts will be made to ensure that both women and men (both local and Syrian) have access to the grievance mechanism (such as the hotline).

During the construction activities, all communication on grievances from the public will be channelled through HATSU's district directorates representatives in the above-mentioned committee. This committee will handle all water and wastewater related complaints and other complaints that may arise during the construction works such as noise, dust, traffic problems, access to schools or businesses, problems for disabled and elderly people.

At the construction sites/work places, the responsible person (committee representative) will be determined by the HATSU communication liaison manager. Responsible persons will be trained on the implementation of the procedures. To keep track of the grievances about the work of the contractors an individual handbook will be opened for each contractor and complaint records will be kept in this handbook along with the date of receipt. Grievances will be sent directly to the contractors by the committee representative in written form and they will be asked to give written information about the status of the problem within seven days. The responses will be registered in the handbooks together with the dates. The issues will also immediately be discussed with the contractor representatives in informal meetings to speed up the process.

HATSU will provide a grievance and complaint mechanism for contractors' workers, enabling them to report any grievances they may have at their work place. At the start of the different contractors' work, HATSU will inform the contractors' workers about this grievance mechanism and provide the name and contact details of the HATSU contact person for any grievances about their working conditions. HATSU will ensure that it is easy for workers to submit their possible grievances through the HATSU contact person, who will ensure transparent feedback without any retribution. If the workers wish so, their complaints will remain anonymous. Workers will be encouraged to submit complaints in writing, but they can also be submitted orally to the HATSU contact person.

At all the construction sites/work places, grievances and complaints will be noted in HATSU grievance handbook for the individual contractor and the complainants will be informed about the status of their complaint. Contractors' response and actions taken along with reasons will also be recorded.

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

10.2 Public Grievance and Complaint Mechanism during Operations Phase

HATSU has a mechanism for public grievances and complaints for its operations. It will strengthen this, based on the experience of implementing the mechanism described above for the project construction phase.

During its operations phase, HATSU will continue with a grievance mechanism for the workers of its contractors, similar to the mechanism described above for the project construction phase.

Flowchart for Processing Grievances

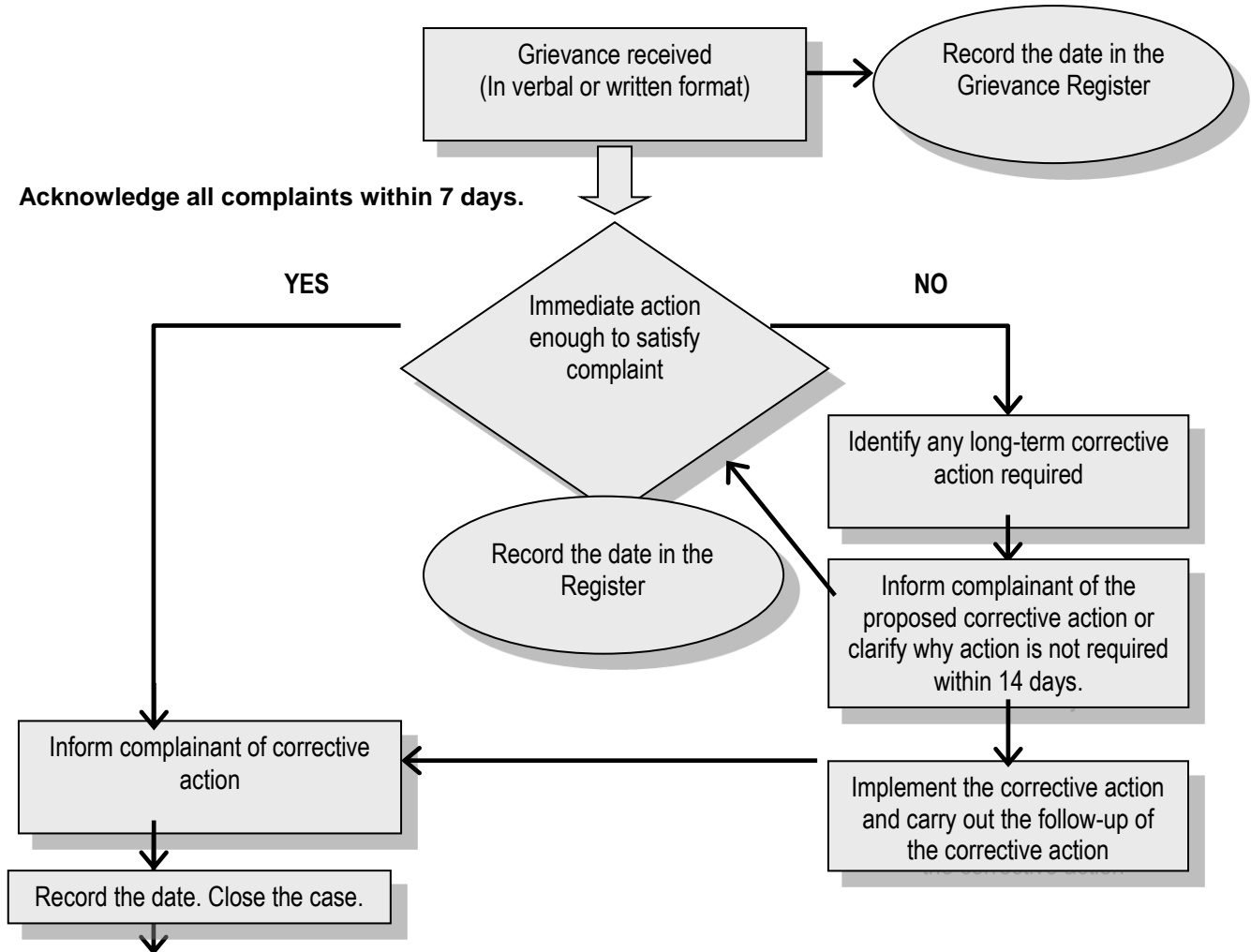


Figure 2: The Grievance Procedure

For each case of grievance, a record sheet shall be filled in either by the complainant in cases where the complainant appears personally at the office of the HATSU District Directorate office or receiving a complaint by phone, e-mail, post or through the HATSU website or the social media. HATSU will review the public grievance form included below before the start of the project.

Public Grievance Form

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

Reference No:	
Full Name	
Contact Information	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Telephone: _____
	<input type="checkbox"/> By E-mail: _____
Preferred Language for communication	<input type="checkbox"/> Turkish <input type="checkbox"/> Arabic
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:
HATSU General Directorate
Attention: 185 Unit Manager
Mehmet Kafadar Street No:3 Antakya/Hatay, Hatay 31100
Telephone: +9 0326 212 43 33 / 35
Fax: +9 0326 212 58 88

11 CONTACT INFORMATION FOR GRIVIANCES, FEEDBACK AND QUESTIONS

HATSU General Directorate is responsible for stakeholder engagement during the design, construction and operations phases. The relevant contact information is:

Attention: HATSU General Directorate

Mehmet Kafadar Street No:3 Antakya/Hatay, Hatay 31100

Telephone: +9 0326 212 43 33 / 35

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E-mail: bilgi@hatsu.gov.tr

HATSU Arsuz District Directorate

Madenli Mah. Atatürk Cad. No. 8

Telephone: +9 0326 658 21 55

Samandağ HATSU District Directorate

Atatürk Mah. Belediye Cad. 30 Uzunbağ, Samandağ, Hatay

Telephone: +9 0326 554 33 51

APPENDIX 1: KEY STAKEHOLDERS

Category / Institution	Description
EXTERNAL STAKEHOLDERS	
Households, organisations and commercial and other enterprises in Samandag and Arsuz districts	<p>Local and Syrian population, organisations, commercial and other enterprises in the two districts of Samandag and Arsuz, particularly in the project areas within the following quarters:</p> <p>Quarters within Samandag district</p> <ul style="list-style-type: none"> • Cemal Gürsel, • Çiğdede, • Cumhuriyet, • Deniz, • Kurtderesi, • Şükrü Kanatlı, • Yeni Mah and • Yeşilada • Small parts of neighbouring quarter(s) (3,000 persons) <p>Quarters within Arsuz district</p> <ul style="list-style-type: none"> • Karaağaç, • Nardüzü, • Karahüseyinli, • Çırtıman, • Kışla, • Gözcüler, • Uluçınar • Madenli • Üçgüllük • Gülcihan
Contractors	Foreign and/or local companies for construction works, services and supplies.
Governmental/State Authorities at the Country Level	
Hatay Governorate	The Governorate ensures the declaration and enforcement of laws, statutes, regulations and government decisions. It coordinates the various public institutions in the province and is responsible for regulating and supervising the general administration and execution in the province in every respect.
The Ministry of Environment and Urbanization (MEU)	MEU has regulatory duties addressing the environment, urban development, and construction industry. These duties involve issuing and executing legislation, making policies, strategies, programs and plans, collecting data, conducting works, defining targets and due dates, supervising and monitoring all the activities for environmental protection and improvement, preventing pollution, making environmental impact assessment for urban development planning, spatial planning, climate change works, and all kinds of facilities and activities. MEU is also responsible for evaluating whether the resolutions and plans made by the local authorities are in conformity with the spatial strategy plans, and for approving them.
The Directorate of European Union Investments (DEUI)	Operating under the Ministry of Environment and Urbanization is responsible for issuing and executing the operational programs within the frame of the related legislation, EU acquires as well as international treaties. The duties of DEUI as the contracting authority of the environmental projects funded by EU involve prioritizing, selecting, awarding, contracting, executing, supervising, and monitoring these projects.
General Directorate of	Involvement in issuing legislation, developing policies, strategies and plans,

Category / Institution	Description
Environmental Management (GDEM)	preventing pollution, maintaining the air quality, and defining targets, threshold values as well as standards for an efficient waste management. GDEM is responsible for defining and approving the design criteria of the wastewater treatment facilities together with the Ministry of Forestry and Water Affairs.
The General Directorate of Environmental Impact Assessment Permit and Inspection	Responsible for executing the environmental impact assessment (EIA) for any kind of activity, making resolutions for the submitted EIA, granting authority and license, and conducting supervising & monitoring activities. It is also responsible for monitoring the receiving environments.
İlbank A.S. (the Bank of Provinces)	İlbank is an investment and development bank affiliated with the Ministry of Environment and Urbanization and partnered by all the Special Provincial Administrations as well as Municipalities. It provides technical assistance as well as investment & funding support for the local authorities such as the Special Provincial Administrations and Municipalities, as well as the local administrative unions on urban development and infrastructure areas. İlbank funds and implements all kinds of environmental infrastructure projects including design, feasibility and construction works.
The Ministry of Forestry and Water Affairs	Responsible for developing policies, strategies and programs on forestation, water management, meteorology, and nature conservation areas. Prepared the River Basin Protection Action Plan (RBPAP). These plans are turned into the River Basin Management Plans in conformity with the EU Water Framework Directive.
General Directorate of State Hydraulic Works (SHW)	Responsible for the management of the surface and underground water. SHW is also responsible for planning & constructing the water supply systems and water treatment facilities, and monitoring the quality & quantity of the surface and underground water (raw) in the provinces. SHW also responsible for providing potable water, domestic water, process water, and related services to all kinds of settlements organized on municipal basis, initiating the forward investment activities for the waste water treatment services, which are considered urgent in hygienic and environmental terms, according to the abovementioned Law. In addition, SHW is the competent authority for water allocation of various purposes.
The Ministry of Development	Responsible for developing, managing and monitoring the national and regional development plans including the annual investment programs and industrial development programs. The Ministry of Development is the institution that evaluates and approves all the investment projects which require public financing and external financing (loan, grant, and technical assistance). This project is submitted for the approval of the Ministry of Development as it is financed by EBRD, one of the international financial institutions.
The Ministry of Health	Has regulatory duties regarding the quality standards of potable water. The Public Health Institution of Turkey affiliated with the Ministry of Health is responsible for defining the norms and procedures for the supervising and monitoring process of potable water through the Provincial Directorates, associated laboratories, and local offices.
The Ministry of Internal Affairs	Responsible for making regulations regarding the establishment and management of local authorities such as Metropolitan Municipalities, Municipalities, Special Provincial Administrations and Unions of Municipalities.
Ministry of Food, Agriculture and Livestock	The duties of this Ministry involve the land use as well as the protection and efficient use of agricultural lands. Any kind of change in the use of agricultural lands and pasturelands is submitted to the approval of the Ministry.
The Ministry of Culture and Tourism	Responsible for supporting the local authorities and tourist facilities located in the tourist regions regarding the planning, construction and management of infrastructure investments.
The Under-secretariat of Treasury	Issues guarantee for the municipalities seeking financing from foreign loan agencies.
Governmental/State Authorities at the Regional and Provincial level	
District Governorate	Coordinates the various public institutions in the district, ensure enforcement of laws.
Provincial Directorate of Turkish Statistical Institution	Is responsible for providing data and information on national, regional and provincial level to natural and legal persons on request. Surveying at the region

Category / Institution	Description
	to update data in coordination with central office in Ankara.
Hatay Province Social Assistance and Solidarity Foundation (SASF)	In coordination with the local governments; in charge of identification the poor and vulnerable according to the determined criteria, examination of the applicants conditions in order to give the proper support and organize both in-kind and monetary aids for poor/vulnerable.
Provincial Directorate of National Education	Could be an important stakeholder for information, education and communication and awareness raising.
Fifth Regional Directorate of Land Registry and Cadastre	Responsible for renewing and updating title deed plans, and to carry out control and supervision services related to these, producing cadastral and topographic maps and sharing data with natural and legal persons.
Provincial Directorate of Migration	Affiliated with Ministry of Internal Affairs. Responsible for keeping all records of immigrants, organises residence and work permits and official documents.
Provincial Directorate of Environment and Urbanization	Represent the Ministry of Environment and Urbanization on provincial basis, and are responsible for executing the relevant legislations in the provinces.
Provincial Directorate of Highways	Responsible for determining standards about project design, construction, repair, maintenance, preparing technical specifications, identifying and carrying out the use of roads, roads and traffic safety and maintenance bases and rules and to establish appropriate road signs.
Provincial Public Health Institution	Responsible for defining the norms and procedures for the supervising and monitoring process of potable water, associated laboratories.
Regional Directorate for Foundations	Preserving and reconstructing old monuments with architectural and historical values, protecting the ventures under the Directorate's responsibility.
Private Companies	
Turk- Telecom (Public-private joint-venture company)	Supply telephone and internet infrastructures. Since the lines may be passing through the project areas, it needs to be coordinated with the company. So, the project will have to discuss and build consensus before and during the constructions of the water supply and wastewater pipelines.
All GSM Operators	Cooperate with HATSU in multicast SMS
TEDAS	One of the main energy suppliers in project areas with transmission lines and transformers. Transmission lines began to be laid underground, Supply energy to the city and to water and wastewater treatment plants and water pumps. Coordination and consensus will be built before and during the infrastructure construction works of water and wastewater pipelines since the lines may be passing through the project areas.
ENERJISA	One of the main energy suppliers in project settlements with transmission lines and transformers. Supply energy to the city and to water and wastewater treatment plants and water pumps. Coordination and consensus will be built before and during the infrastructure construction works of water and wastewater pipelines since the power lines may be passing through the project areas.
AKSA CUKUROVA Natural Gas	The only natural gas supplier in project settlements. Natural gas service is gradually developing in project settlements excluding Samandağ. Coordination and consensus will be built before and during the infrastructure construction works of water and wastewater pipelines since the gas lines may be passing through the project areas.
Related Projects and international organizations	
JICA (Japan International Cooperation Agency)	It is an agency that provides Official Development Assistance (technical and financial) to the countries. JICA provides technical cooperation, development loans and investments in Turkey. HATSU received funding from JICA for several drinking water, wastewater infrastructure and for wastewater treatment plant investments.
EBRD	HATSU has requested EBRD to assist with funding of the priority investments in Samandag and Arsuz districts.
Mass-Media, Internet	
National/Regional wide TV and Radio	Mass media: TV (HRT Akdeniz TV, 20 news portals of different districts), 10 local radio and several national radio companies.
Newspapers	Several National and 7 City newspapers and magazines

Category / Institution	Description
Internet providers	TTNET /Turk telecom, Turkcell, Superonline, Turknet, Vodafone etc.
Local Organizations such as professional chambers, women and youth organizations and other NGOs	
INTERNAL STAKEHOLDERS	
HATSU General Board	Hatay Metropolitan Municipality Council is serving as the General Board of HATSU. Mayor of the Metropolitan Municipality is the also the President of the Council. Hatay Metropolitan Municipal Council meets as HATSU General Board every year in May and November with a special agenda and discusses and concludes the duties assigned to it.
Board of Directors	HATSU Board of Directors consists of Hatay Metropolitan Municipality Mayor, HATSU General Manager, one of the HATSU Assistant General Managers and at least two external members. Mayor of the Metropolitan Municipality is the President of the Board of Directors. In absence of the Chairman, the General Manager presides over the Board of Directors.
Auditors	The operations of HATSU are supervised by two auditors who works continuously throughout their service period.
General Directorate	The General Directorate consists of General Manager, Assistant General Managers, Legal Counsel, Head of Inspection Board, Internal Auditors, Heads of Departments, Managers and other personnel affiliated to them.
HATSU Employees	As per August 2017, 394 employees are employed directly by HATSU and around 1,700 sub-contracted staff (they work in specific functions outsourced to other companies).