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# SUSTAINABLE CITIES PROJECT-II

## Additional Financing

### KONYA METROPOLITAN MUNICIPALITY

### Doganhisar Wastewater Treatment Plant Project

### Stakeholder Engagement Plan (SEP)



**TUMAŐ - ENCON  
JOINT VENTURE**



OCTOBER 2023





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## REVISION HISTORY

Ver.	Date of Issue	Issue Reason	Client	Project Owner	Consultant
1	February 2022	First Submission	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
2	April 2022	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
3	June 2022	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
4	July 2022	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
5	May 2023	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
6	May 2023	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
7	July 2023	Incorporation of Related Comments	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture
8	October 2023	Incorporation of SCM Documents	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAŐ & ENCON Joint Venture



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## LIST OF ABBREVIATIONS

<b>AFAD</b>	Disaster and Emergency Management Presidency
<b>AoI</b>	Area of Influence
<b>BPs</b>	Bank Procedures
<b>CEKUL</b>	Foundation for the Protection and Promotion of the Environment and Cultural Heritage
<b>CIMER</b>	Presidency's Communication Center
<b>DSI</b>	General Directorate for State Hydraulic Works
<b>E&amp;S</b>	Environmental and Social
<b>EIA</b>	Environmental Impact Assessment
<b>ENCON</b>	ENCON Cevre Danismanlik Ltd. Sti.
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMR</b>	Environmental and Social Monitoring Report
<b>EU</b>	European Union
<b>FI</b>	Financial Intermediary
<b>GBV</b>	Gender Based Violence
<b>GRM</b>	Grievance Redress Mechanism
<b>IFC</b>	International Finance Corporation
<b>IFI</b>	International Finance Institutions
<b>ILBANK</b>	ILBANK A.S.
<b>KOSKI</b>	Konya Metropolitan Municipality General Directorate of Water & Sewerage Administration
<b>KPI</b>	Key Performance Indicator
<b>KTO</b>	Konya Chamber of Commerce
<b>m<sup>3</sup>/day</b>	Cubic meter per day
<b>MoEUCC</b>	Ministry of Environment, Urbanization and Climate Change
<b>MoH</b>	Ministry of Health
<b>NGO</b>	Non-Governmental Organization
<b>OHS</b>	Occupational Health and Safety
<b>OPs</b>	Operational Policies
<b>PAP/s</b>	Project Affected Person(s)
<b>PIF</b>	Project Introduction File
<b>PIU</b>	Project Implementation Unit
<b>SCM</b>	Stakeholder Consultation Meeting
<b>SCP-II-AF</b>	Sustainable Cities Project-II - Additional Financing
<b>SEA/SH</b>	Sexual Exploitation and Abuse / Sexual Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>TAYCED</b>	Waste and Environmental Management Association



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<b>TEMA</b>	Turkish Foundation for Combating Soil Erosion, Reforesting and the Protection of Natural Habitats
<b>The Project</b>	Doganhisar Wastewater Treatment Plant Project
<b>TUMAS</b>	TUMAS Turk Muhendislik Musavirlik ve Muteahhitlik A.S.
<b>TurkStat</b>	Turkish Statistical Institute
<b>WB</b>	The World Bank
<b>WHO</b>	World Health Organization
<b>WWF</b>	World Wildlife Fund
<b>WWTP</b>	Wastewater Treatment Plant
<b>YIMER</b>	Ministry of Interior General Directorate of Migration Management Foreigners Communication Center



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## EXECUTIVE SUMMARY

Doganhisar Wastewater Treatment Plant Project (“the Project”) is one of the sub-projects covered under the Sustainable Cities Project-II - Additional Financing (SCP-II-AF) to support sustainable development in Turkish cities. The Project aims to solve environmental pollution caused by lack of wastewater treatment and to improve public health in the Doganhisar district center (Aga, Bas, Cuma, Harman, Kuz, Pazar, Sih and Yegin Neighborhoods), Cinaroba and Yenice Neighborhoods. The Project will be financed by World Bank (WB) and the Project Management Unit (PMU) of ILBANK A.S. (ILBANK) is the Borrower of the loan, serving as a Financial Intermediary (FI) to Konya Water and Sewerage Administration (KOSKI). KOSKI will be responsible for the implementation of the Project at the local level.

This Stakeholder Engagement Plan (SEP) has been prepared by TUMAŐ Turk Muhendislik Musavirlik ve Muteahhitlik A.S. (TUMAS) & ENCON Cevre Danismanlik Ltd. Sti. (ENCON) Joint Venture for KOSKI, who is the Project Owner of the Project.

The Project will be implemented on parcels 171/134 and 171/136 of Pazar Neighborhood of Doganhisar District of Konya Province located in Central Anatolia Region of Türkiye. In the current situation, the untreated wastewater discharging into the tributaries of Cebisli Creek puts considerable pressure on the environment and public health. Within this regard, the Project aims to remove this pressure through construction of a Wastewater Treatment Plant (WWTP) that has a capacity of 1,000 m<sup>3</sup>/day with a target year of 2055 and the designed population to be served is 10,000 on approximately 4,400 m<sup>2</sup> area.

The expected results from the Project are listed below:

- The Project will enable KOSKI to provide proper wastewater treatment in Doganhisar District and thereby reduce risk to public health, environment, and natural sources;
- The Project will eliminate the odor complaints in the region;
- The Project will provide contribution for Türkiye to comply with national and international quality standards in the wastewater sector; and
- The health standards of the public will be improved through the implementation.

The Project’s anticipated environmental and social (E&S) impacts/risks will be in terms of air quality, geology, soils, water resources, noise, biological environment, landscape, resources and waste, climate change, socioeconomic environment and occupational health and safety, cultural heritage, and community health, safety and security.

The project will be in compliance with the good international practice, including WB Safeguard Policies, guides, standards and best practices documents alongside the national legislation. Specific standards related to the SEP are as follows:

- WB Operational Policies (OP) 4.01 – Environmental Assessment,
- WB OP 4.11 – Physical Cultural Resources,
- WBG General Environmental, Health and Safety (EHS) Guidelines,
- Bank Policy (BP) 17.50 Bank Disclosure Policy,
- WB 2010 Access to Information Policy,
- WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH),
- Environmental and Social Management Framework (ESMF) of SCP-II AF.

According to the repealed Environmental Impact Assessment (EIA) Regulation (Official Gazette dated November 25, 2014 and numbered 29186), Doganhisar Wastewater Treatment Plant (1,000 m<sup>3</sup>/day) Project has been evaluated as out of scope; therefore, an EIA study was not required for this project. “EIA Exemption Letter” was issued by Provincial Directorate of Environment,





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Urbanization and Climate Change (see Appendix-1) and it is still valid as per the new EIA Regulation published in the Official Gazette dated July 29, 2022 and numbered 31907.

On the other hand, the Project has been categorized as Category B Project according to the definitions in OP/BP 4.01 on Environmental Assessment. In addition, the Project classified as Moderate Risk according to WB's Environmental and Social (E&S) Policy.

There is no national protected area and the internationally protected and recognized area within the project area. Furthermore, there are no sensitive areas, such as important environmental protection zones, critical natural habitats, natural habitats, etc. in and around the project area.

With the realization of the Project, the wastewater will be treated and discharge of untreated wastewater into environment will be prevented. Therefore, the Project will have positive impact on both the environment and public health.

The construction of WWTP does not require expropriation of any private land since the area currently belongs to KOSKI following the land transfer process of the WWTP site completed in November 22, 2017. The WWTP site is currently in idle status and there is no land use for any purpose and outstanding claim, any informal users, and squatters on the land.

Within the scope of the Project, the treated wastewater will be discharged to Cebisli Creek through 22 m discharge line to be constructed. The underground discharge line will pass through WWTP parcel and then will cut the existing cadastral road vertically.

In terms of auxiliary facilities, the construction site will be established at the WWTP site, which currently belongs to KOSKI. In addition, the labor campsite will be set up in the project area, in other words, there will be no campsite in any other area.

Furthermore, cadastral roads will be used for the energy transmission lines; therefore, land acquisition is not required for the energy transmission lines, and within this regard, project of the energy transmission lines are approved by Meram Electricity Distribution Inc. The WWTP site is accessible through the existing road network; therefore, construction of any access/service road is not required.

The project will not cause any economic displacement. The impact on local businesses during the construction of the WWTP will only be temporary and not significant. Road closures will be avoided as much as possible and therefore, shops/stores are not expected to be closed due to the construction activities.

Although the exact total number of workers to be employed during the construction and operation phases is currently unknown, it is estimated as 100 and 10 for the construction and operation phases, respectively. In the employment process, priority will be given to the local community. The construction of the Project is planned to be completed in 15 months.



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## I INTRODUCTION

This Stakeholder Engagement Plan (SEP) has been prepared by TUMAS Turk Muhendislik Musavirlik ve Muteahhitlik A.S. (TUMAS) & ENCON Cevre Danismanlik Ltd. Sti. (ENCON) Joint Venture, the E&S Consultant, for Doganhisar Wastewater Treatment Plant Project (“the Project”) for Konya Metropolitan Municipality Water and Sewerage Administration (KOSKI), the Project Owner. The Project will be implemented in Doganhisar District of Konya Province.

Doganhisar Wastewater Treatment Plant Project is one of the sub-projects covered under the SCP-II-AF to support sustainable development in Turkish cities. The emergence of the SCP-II-AF is a response to ongoing technical assistance for sustainable urban development and capital investment planning being provided under Component A (Municipal Investments) of SCP-I. This exceptional demand includes identification of investments to improve public transport, water and sanitation, solid waste management, energy, environment, disaster risk management and climate resilience, and social infrastructure. The Project aims to solve environmental pollution caused by lack of wastewater treatment and to improve public health in the Doganhisar District.

The Project will be financed by the World Bank (WB). Project Management Unit (PMU) of ILBANK A.S. (ILBANK) is the Borrower of the loan, serving as a Financial Intermediary (FI) to KOSKI, who will be responsible for the implementation of the Project at the local level.

The SEP encompasses planned stakeholder consultation activities and the process of stakeholder engagement. The SEP is prepared in compliance with WB Safeguard Policies, including Operational Policies (OPs), standards and best practice documents, WBG General Environmental, Health and Safety (EHS) Guidelines, Bank Policy (BP) 17.50 Bank Disclosure Policy, Environmental and Social Management Framework (ESMF) of SCP-II AF, WB 2010 Access to Information Policy and WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) alongside the national legislation.



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## II PROJECT DESCRIPTION

The Project will be performed in Doganhisar District of Konya Province located in Central Anatolia region of Türkiye (see Figure II-1). In the current situation, the untreated wastewater discharge into the tributaries of Cebisli Creek puts considerable pressure on the environment and public health. Within this regard, the Project aims to remove this pressure through construction of a wastewater treatment plant (WWTP) that has a capacity of 1,000 m<sup>3</sup>/day with a target year of 2055 and the designed population to be served is 10,000 on approximately 4,400 m<sup>2</sup> area.

The construction of the WWTP will be realized on parcels 171/134 and 171/136 of Pazar Neighborhood of Doganhisar District (see Figure II-2). The parcels, which have a total area of 7,190.00 m<sup>2</sup> and previously owned by Doganhisar Municipality, currently belongs to KOSKI. The land transfer process of the WWTP site was completed in November 22, 2017. The area is currently in idle status and there is no land use for any purpose and outstanding claim, any informal users, squatters on the land. Therefore, the Project does not trigger WB OP 4.12 – Involuntary Resettlement, any land acquisition, resettlement, and economic displacement with all of its components.

According to the repealed EIA Regulation (Official Gazette dated November 25, 2014 and numbered 29186), wastewater treatment plants that have capacity below the 50,000-150,000 equivalent population and/or 10,000-30,000 m<sup>3</sup>/day are out of the scope of the EIA Regulation. Doganhisar Wastewater Treatment Plant Project with a capacity of 1,000 m<sup>3</sup>/day has been evaluated as out of scope since it is less than the threshold value in the Annex lists of the EIA regulation. Therefore, an EIA study was not required for this project, and an “EIA Exemption Letter” was issued by Provincial Directorate of Environment, Urbanization and Climate Change (see Appendix-1) and it is still valid as per the new EIA Regulation enforced by publishing in the Official Gazette dated July 29, 2022 and numbered 31907. On the other hand, considering the location of the Project and the nature of its potential environmental and social impacts, the Project is categorized as Category B Project for which an ESMP is required under WB screening criteria and OP 4.01.

The social area of influence for the Project includes the neighborhoods that are located in the project area and its close vicinity. The social area of influence (Aol) the Project is given in Figure II-3. The area of influence of the Project is 166.77 ha and the social influence area of the Project is 1581.50 ha.

The tendering and contracting period of the Project is expected to be in the fourth quarter of 2023, and after the tendering period, the construction works will start and last for 15 months for the WWTP. The defect liability period (DLP) starts just after that completion of the construction phase and lasts for 12 months. According to technical specifications of ILBANK, the design lifetime of the Project has been accepted as 2055.

Within the scope of the Project, the treated wastewater will be discharged to Cebisli Creek through 22 meter discharge line to be constructed. The underground discharge line will pass through WWTP parcel and then will cut the existing cadastral road vertically.

In terms of auxiliary facilities, cadastral roads will be used for the energy transmission lines; therefore, land acquisition is not required for the energy transmission lines and within this regard, project of the energy transmission lines are approved by Meram Electricity Distribution Inc. Moreover, a construction site will be established at the WWTP site, which currently belongs to KOSKI, and the labor campsite will be set up in the Project area. The WWTP site is accessible through the existing road network; therefore, construction of any access/service road is not required.

In terms of associated facilities, based on oral communications carried out with KOSKI representative, wastewater collector line with a length of 7.5 km will be constructed that is not included within the scope of the Project. Although the route of the line is not determined yet, it is expected to pass under the existing roads.



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There is no national protected area and the internationally protected and recognized area within the project area. Furthermore, there are no sensitive areas such as important environmental protection zones, critical natural habitats, natural habitats, etc. in and around the project area.

Environmental and social impacts are expected during construction and operation phases of the Project. Within this regard, an Environmental and Social Management Plan (ESMP) has been developed for the management of anticipated impacts. The ESMP has been prepared to identify potential environmental and social impacts and risks that may occur during the construction and operation phase of the project such as odor, noise, impact on water sources, wastes, occupational health and safety, and workforce arising from the development of the Project and to propose mitigation measures for significant adverse environmental impacts. In addition, the monitoring activities to be implemented within the scope of the ESMP are also defined.

The expected results from the Project are listed below:

- The Project will enable KOSKI to provide proper wastewater treatment in Doganhisar District and thereby reduce risk to public health, environment, and natural sources;
- The Project will eliminate the odor complaints in the region;
- The Project will provide contribution for Türkiye to comply with national and international quality standards in the wastewater sector; and
- The health standards of the public will be improved through the implementation.

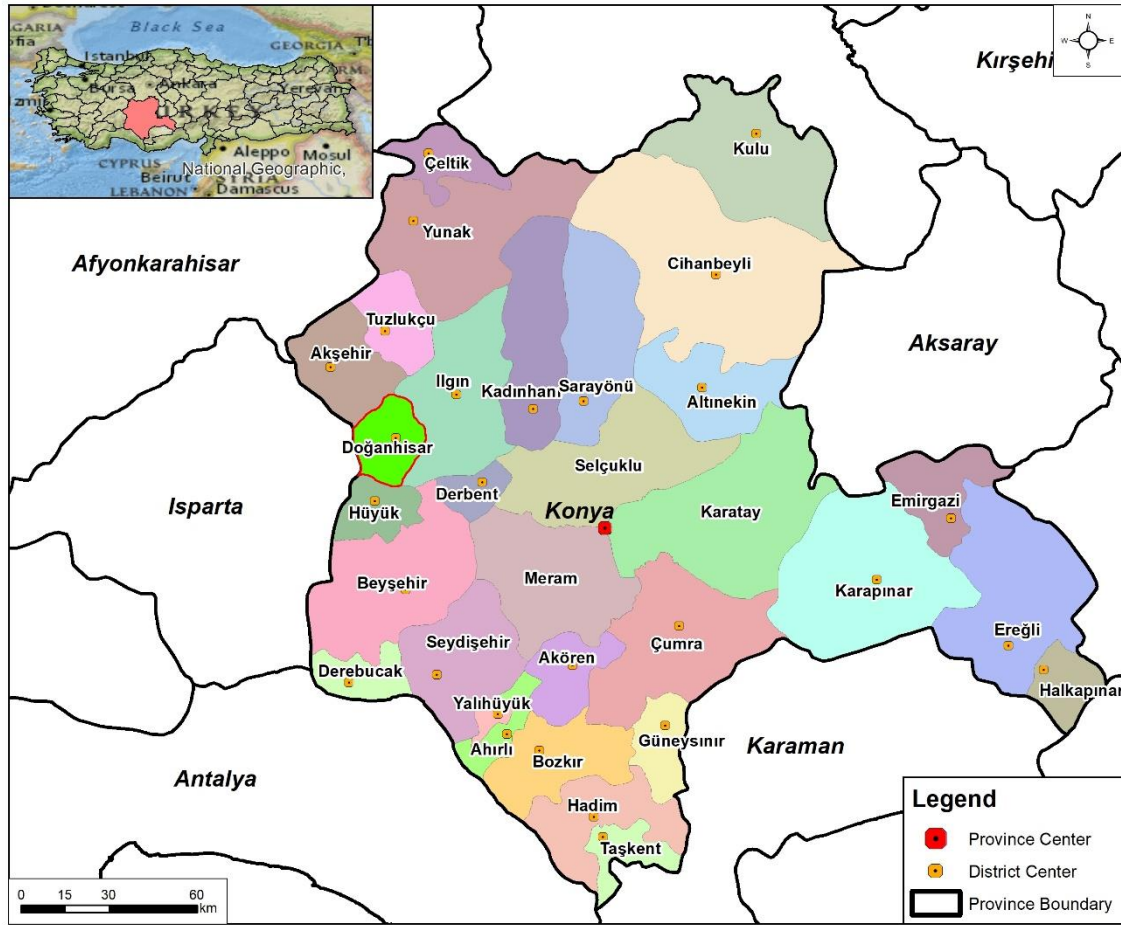


Figure II-1 Districts of Konya Province



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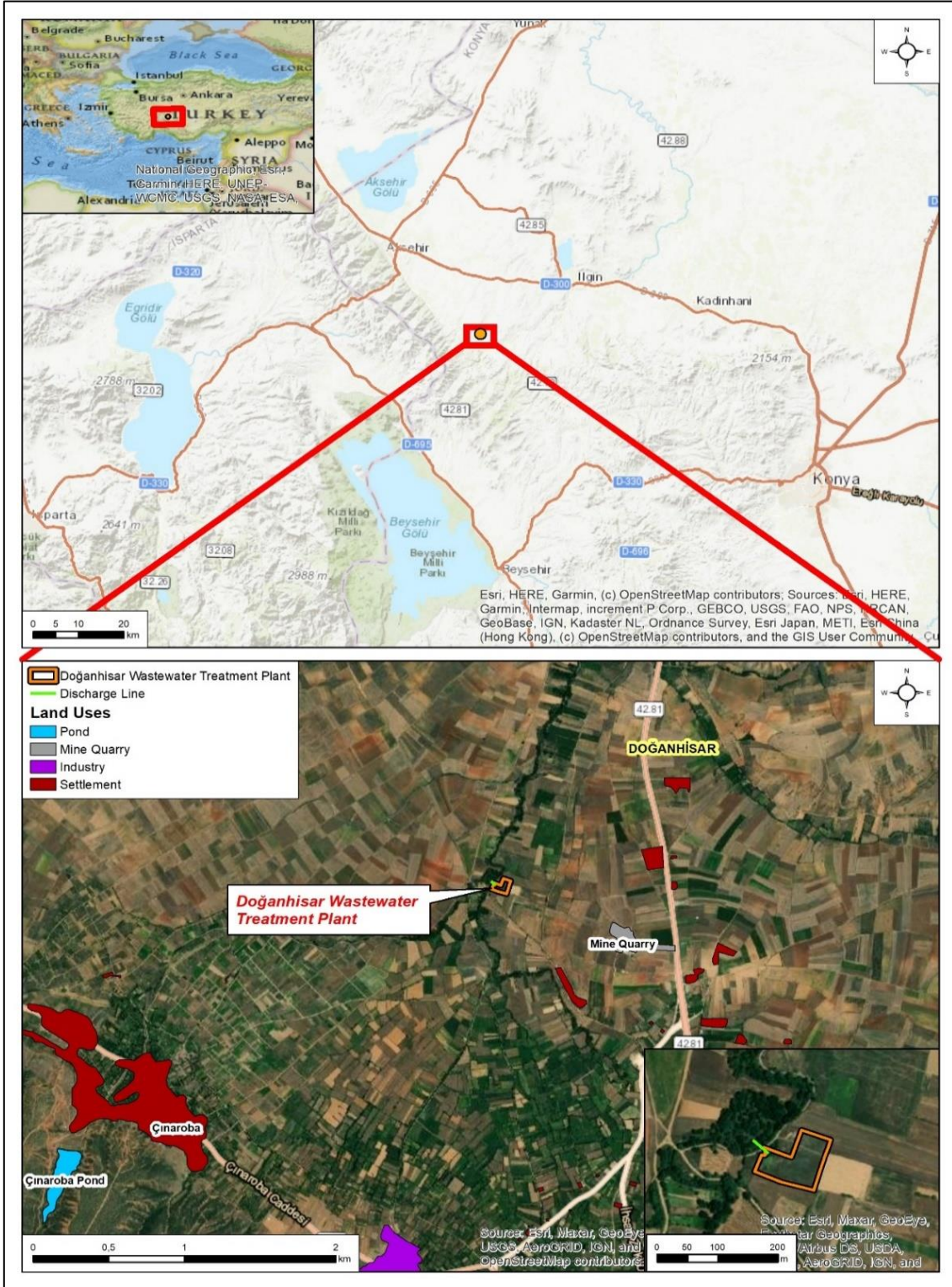


Figure II-2 Site Location Map for the Project Area



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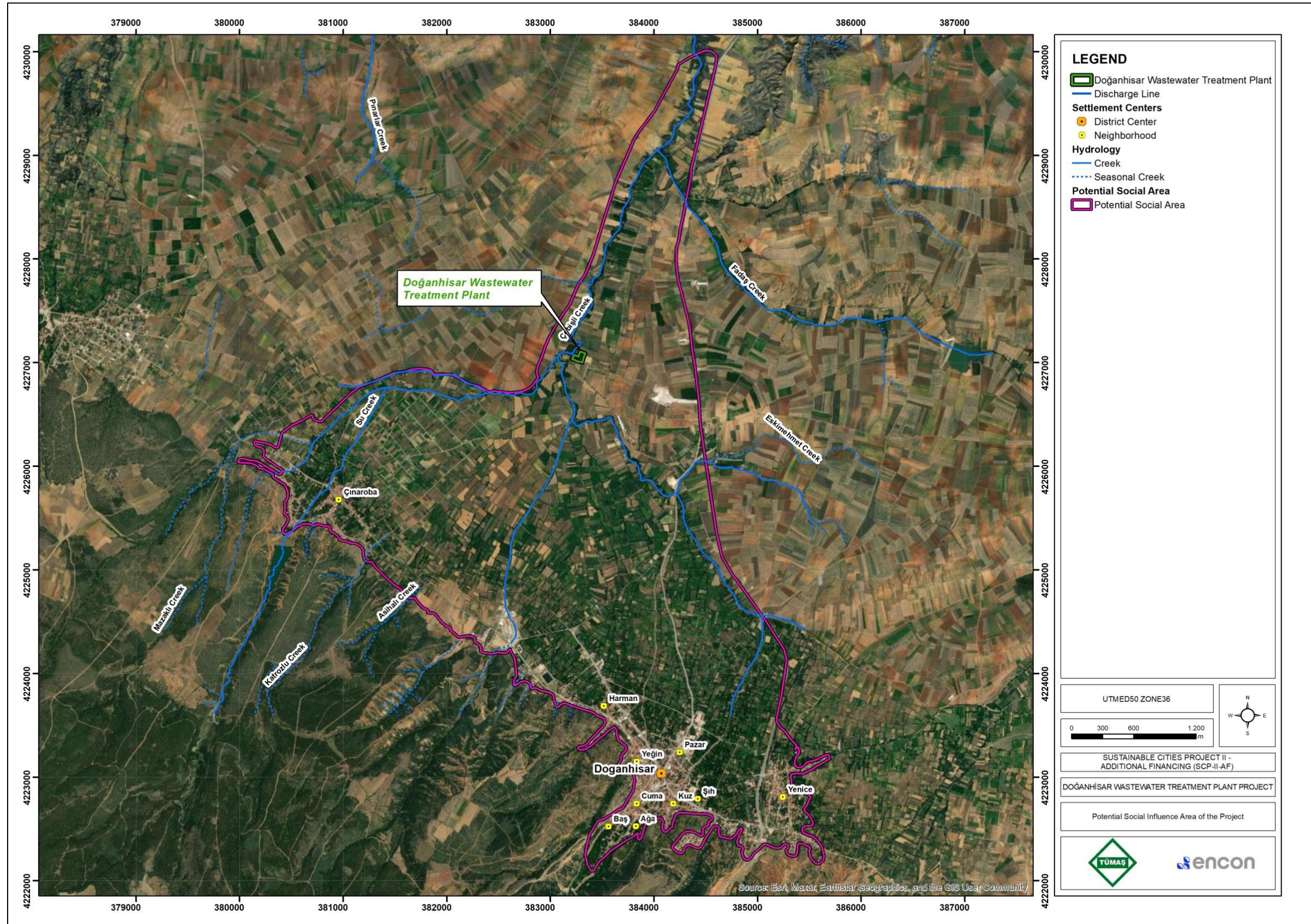


Figure II-3 Potential Social Area of Influence (Aol) of the Project



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### III PURPOSE AND SCOPE OF THE SEP

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a variety of external stakeholders over the entire life of the project. Initiating the engagement process in the early phases of the project helps ensure timely public access to all relevant information and provides the stakeholders with an opportunity to input into the project design and the assessment of impacts.

The main goals of stakeholder engagement are to;

- Identify the direct and indirect stakeholders of the project and other interested parties, who may be affected, and/or able to influence the project and its activities,
- Identify the nature of stakeholders' interests and concerns related to the project,
- Ensure that adequate and timely information about the project and its environmental and social impacts/risks is provided to stakeholders,
- Provide to these groups opportunities to voice their concerns and opinions,
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process.

SEP is designed to ensure that KOSKI will identify all stakeholders and establishes an effective engagement strategy during the development and lifetime of the Project. The ultimate goal of the SEP is to build meaningful and trusting relationships with the local community and other interested stakeholders based on a transparent and timely supply of information and open dialogue.

SEP covers the following aspects:

- Applicable national and international regulations and WB requirements on stakeholder engagement, particularly WB OP 4.01, and also ESMF,
- Previous consultation activities and future plans to engage with stakeholders during the construction and operation phases of the Project,
- Identification of direct and indirect project stakeholders,
- Strategy for consultation and information disclosure,
- Timetable for various stakeholder engagement activities,
- Resources and responsibilities for the implementation of the SEP,
- Means of monitoring and reporting on consultation and disclosure activities,
- Grievance redress mechanisms for both internal (including workers) and external stakeholders to raise concerns, provide feedback and comments about the Project Owner operations and how complaints/comments will be handled.

In addition, workers' grievances will be addressed through separate channels. GRM is accessible to all beneficiaries of ILBANK internationally funded projects, host communities or anyone, who is affected by or is likely to affect the projects in question and who wishes to provide feedback or complaints and receive a response.



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## IV PUBLIC CONSULTATION/STAKEHOLDER ENGAGEMENT REQUIREMENTS

Implementation of the Project will follow the framework laws and regulations of the Turkish Republic as well as applicable international standards and WB requirements. In this context, stakeholder engagement activities will conform to relevant WB Safeguard Policies, including the Operational Policies (OP) (i.e. OP 4.01 and World Bank's 2010 Policy on Access to Information) and EU Directives. Moreover, it should be noted that the most stringent among national legislation and WB standards will be complied and also the most up-to-date legislation will be considered.

### IV.1 National Regulations and Requirements

Environmental Law No. 2872, which is ratified in August 1983 (Official Gazette dated 11.08.1983 and numbered 18132), is one of the principal legislation related to the Project. Several by-laws and decrees are enforced under the Environmental Law. The EIA Regulation (Official Gazette dated July 29, 2022, and numbered 31907) defines the administrative and technical procedures and principles to be followed throughout the EIA process and is largely in line with the EU Directive on EIA. When an activity (a Project) is planned, the Project developer is responsible for preparing an EIA Report along with many other permits required to realize the Project. However, facilities are subject to the preparation of an EIA Report depending on the type of the facility, its capacity, or the location of the activity. The activities that are subject to the provisions of the EIA Regulation are listed in Annex I and Annex II of the Regulation. For Annex I activities a full EIA Report is required and those Projects go through the full EIA process. For Annex II activities, a Project Introduction File (PIF) is prepared in accordance with the outline given in the EIA Regulation and the relevant process has to be conducted. As a result of the submission of PIF, if "EIA is required" decision is given, a full EIA Report is prepared. If it is decided that the EIA is not required as a result of the submission of the PIF, the project can be started without any obligation by the Turkish EIA regulation.

The main Turkish Regulation requiring public consultation and stakeholder engagement for development/investment/infrastructure projects is the EIA Regulation. The 1<sup>st</sup> Clause of the 9<sup>th</sup> Article of the Turkish EIA Regulation defines the stakeholder consultation process. In accordance with the related article, it is the legal responsibility of a Project Owner to organize an official Public Information and Participation Meeting for the projects that are included in Annex 1 of the Regulation (as the case in the EU EIA Directive). The date and place are determined in agreement with the Ministry of Environment, Urbanization and Climate Change (MoEUCC). The aim of the Public Information and Participation Meeting is to inform people who may be potentially affected by the project and to understand their concerns, opinions and suggestions about the project. Moreover, MoEUCC and the governorships are responsible for informing the public that the review period of the EIA Report is started via announcements using local and national media, boards, internet etc. Thus, public will be able to access the EIA Report from the web site of the MoEUCC or the relevant Provincial Directorate and comment on the report. Those comments are reviewed in the Review Commission meeting and the results are reflected in the EIA Report. This process is the only formal requirement for stakeholder consultation according to Turkish legislation and only applies for the projects listed in Annex I.

The Turkish Law on the Right to Information (Law No: 4982) was adopted on 09.10.2003 and published in the Official Gazette dated 24.10.2003 and numbered 25269. The main objective of this Law is to regulate the procedure and provide the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. This Law applies to the activities of public institutions and professional organizations, which qualify as public institutions. The Law, which is divided into five parts in total, explains the legal rights and obligations about information disclosure processes. The first part of the Law defines the objective, scope and definitions of terms that are used in law. The second part of the Law makes statements about the subjects of the Right to Information and the Obligation to Provide Information. According to Articles 4 and 5 of this Law found in this part, everyone has the right to information and the responsible parties are obligated to provide information. The application process for accessing information is explained in the third part of the law. In the fourth part of the Law, the information that is restricted is described and some examples are: information and documents pertaining to the state secrets, information and documents pertaining to the economic interests of the





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state, etc. Finally, the last part of the Law describes the miscellaneous aspects of this Law such as entry into force and execution.

Doganhisar Wastewater Treatment Plant Project has been evaluated as out of scope since it is less than the threshold value in the Annex lists of both repealed and newly published EIA regulations. Therefore, “EIA Exemption” decision was granted by Provincial Directorate of Environment, Urbanization and Climate Change for the Doganhisar Wastewater Treatment Plant Project (see Appendix-1) and the decision is still effective.

## IV.2 International Requirements and WB Policies

The Project is intended to meet applicable international standards and best practices of the International Finance Institutions (IFIs). IFIs consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits.

In this context, SEP follows the requirements of EU directives, WB OP 4.01 and WB 2010 Access to Information Policy and BP 17.50 Bank Disclosure Policy. Also WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) is another specific guide to follow for the effectiveness of the grievance redress mechanism within this SEP.

The WB OP 4.01 - Environmental Assessment covers public / stakeholder consultation and disclosure and in this respect, required consultation and disclosure activities have to be conducted taking the scale and nature of the Project into account covering the following:

- Identifying the range of stakeholders,
- Providing affected communities with access to relevant project information,
- Implementing and maintaining a grievance redress mechanism,
- Engaging with and providing information to project-affected and other interested parties throughout the life-cycle of the project.

Another requirement about this SEP is to follow BP 17.50 Bank Disclosure Policy. Main aim of the policy is to support the decision-making process by allowing public access to information on environmental and social aspects of the project.

Also WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), applies to projects in any World Bank Global Practice that involves major civil works, defined here as civil works large enough to be carried out by a contractor. The World Bank has developed this Good Practice Note to assist in identifying risks of SEA/SH – as opposed to all forms of Gender Based Violence (GBV) that can emerge in projects involving major civil works contracts – and to advise the borrowers on how to best manage such risks.

Under the WB OP 4.01, projects are classified as Category A, B and C, based on the level of their likely environmental and social impacts. Considering the location of the Project and the nature of its potential environmental and social impacts/risks, the Project has been categorized as Category B Project for which an ESMP is required under WB screening criteria and OP/BP 4.01.



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## V PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Major targets of KOSKI are to supply clean, high quality, and healthy drinking water to inhabitants of Konya, to use and preserve the water resources in the most efficient way, to ensure the proper treatment of wastewater and to provide high standard services by adopting a modern management approach in its institutional development in general. This proposed Project is among the steps to achieve the above-mentioned targets and in this context; the Project is expected to have positive impacts on socio-economy, ecology, community health and safety. Some potential adverse impacts could be mainly faced during the construction and operation phases, which are to be mitigated and managed. In this context, a field study was carried out by E&S Consultant on October 13, 2021 in order to contact with the stakeholders of the Project, to inform them about the project location, components and potential environmental and social impacts and to exchange information and opinions about the project.

As the project is not within the scope of the EIA, the stakeholder engagement activities within the scope of the Turkish EIA regulation is not mandatory for this project. Within the scope of the ESIA studies, a stakeholder consultation meeting was held on 21<sup>st</sup> of September, 2023. The aim of the stakeholder consultation meeting is to inform people who may be potentially affected about the Project and to understand their concerns, opinions and suggestions about the project.

Considering the location of the Project and the nature of its potential environmental and social impacts, the Project is categorized as Category B Project for which one Public / Stakeholder Consultation Meeting is required under WB screening criteria, ESMF and OP 4.01. Key informant interviews were carried out by the E&S Consultant during the preparation of the draft ESMP of the project with the mukhtars of Harman and Pazar neighborhoods, where the WWTP will be built and operate. In these interviews, information about the general socio-economic structure of the neighborhoods was obtained from the mukhtars.

The findings of these interviews are presented below:

- Harman Neighborhood Mukhtar
  - Major economic activities of the residents are agriculture and animal husbandry. Other than that, majority of the residents live on pension.
  - Among the residents, there are approximately 30 people, who receive support from social assistance and solidarity foundation.
  - Unemployment is a major problem in the neighborhood.
  - Wastewater generated in the neighborhood is currently being discharged to Cebisli Creek, which is being used for the agricultural irrigation.
  - Residents complain regarding to the odor caused by the wastewater discharge into the creek.
- Pazar Neighborhood Mukhtar
  - Major economic activities of the residents are agriculture and animal husbandry. Other than that, majority of the residents live on pension.
  - Among the residents, there are approximately 15 people, who receive support from social assistance and solidarity foundation.
  - Wastewater generated in the neighborhood is currently being discharged to Cebisli Creek, which is being used for the agricultural irrigation.
  - Residents complain regarding to the odor caused by the wastewater discharge into the creek.

The mukhtars were informed at the Pazar neighborhood's mukhtar office about the project and their questions about the construction and operation processes were answered. While the questions asked by the mukhtars are generally about the general operations of KOSKI and other activities



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related to KOSKI, questions about the locations where the WWTP will be built, the locations where it will serve and the project schedule have been answered. The related questions of mukhtars were answered by the E&S consultant's environmental expert and by the KOSKI official. Sample photographs from these key informant interviews are presented in Figure V-1.

In identifying vulnerable/disadvantaged groups, information obtained from formal/informal interviews and phone call interviews with representatives/key informants of neighborhoods within the Project area was used. For stakeholder identification and analysis, phone calls were made with the mukhtars of Aga, Bas, Cinaroba, Cuma, Harman, Kuz, Pazar, Şıh Districts on 02-04 May 2023 and information was obtained about vulnerable/disadvantaged groups. The findings of the interviews are presented in Section VI.



Figure V-1 Interviews with the Mukhtars

The highlights of the key informant interviews can be summarized as follows:

- During the key informant interviews, it was stated that Doganhisar has eight neighborhoods and all the lands in the district irrigate their lands with irrigation water. However, wastewater from sewage is mixing into the irrigation water of the neighborhoods.
- They stated that they carry a risk of disease because wastewater from sewage is mixing into the irrigation waters.
- They stated that they had positive opinions about the project due to these difficulties and that they expected the project to be realized.

The stakeholder consultation meeting of the Project was held on 21<sup>st</sup> of September 2023. Doganhisar Municipality Cultural Center was selected by KOSKI as a meeting venue, which is located at the Doganhisar District of Konya Province. The meeting venue had enough capacity and facilities to ensure comfortable and efficient communication during the event.

Prior to stakeholder consultation meeting, several information dissemination methods were used to inform the related public authorities (including provincial governorates, district governorates, municipality mayors, etc.), mukhtars and local people, and local media agencies and wider public including Non-Governmental Organizations (NGOs), etc. During the information dissemination process in advance of the stakeholder consultation meeting, initially announcements were published in local newspapers on September 08, 2023 and official website of KOSKI on September 12, 2023. Advertisement on newspaper and KOSKI official website to announce the meeting is given in



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Appendix-2. In addition, before the commencement of meeting, project information brochures were distributed to participants and maps of the Project were also made available for them. The brochure is provided in Appendix-10 **Hata! Başvuru kaynađı bulunamadı..**

The meeting was held with the participation of the local people together with the representatives of KOSKI (Project Beneficiary and Executing Organization), and ENCON (the E&S Consultant). The photographs from meeting are presented in Appendix-7.

The meeting started with an introduction and explanation of the purpose and scope of the meeting and followed by a presentation by ENCON and a final discussion session where questions, concerns and suggestions were received. The presentation used during the meeting is provided in Appendix-9. The main topics covered in the presentations were as follows:

- What is the Project?
- Who are the Project Main Executive Body, the Project Beneficiary and Executing Organization and the Project Sponsors?
- What are the Anticipated Benefits of the Project?
- What is the Environmental and Social Impact Assessment Studies?
- Stakeholder Engagement: How to Participate into the Process?
- Discussion (Questions and Answers) Session

Large-scale (in A1 format) maps showing the Project area were provided for the public.

A total 40 people participated in the meeting held on September 21, 2023 for the Project. List of participants to the stakeholder consultation meeting (SCM) is presented in Appendix-8 of this document. The meeting lasted for about one hour. The questions, issues, concerns and suggestions raised by the participants during the SCM were categorized and a summary of the SCM findings is provided in Table V.1.

**Table V.1 Summary of Stakeholder Consultation Meeting Findings**

Party who Raised the Question/ Issue/Concern/ Suggestion	Question/Issue/Concern/ Suggestion Raised	Response of Project Sponsors/ Environmental Consultant
Participant 1*	Will Kemer District be included in the scope of the Project?	It was stated that there is already natural wastewater treatment in Kemer District and the problem related to the laying of the sewer line will be solved, but it is not included in the scope of this Project.
Participant 2*	Can treated wastewater be used for irrigation?	It was stated that grain group products such as barley and wheat can be irrigated with permission from the Provincial Directorate of Environment, Urbanization and Climate Change, but its use is not recommended for irrigation of vegetables and fruits. It was also added that the treated water will have a Class B irrigation water quality.
Participant 3*	What can be done about transportation and roads?	It was stated that the roads will be improved with the support of Dođanhisar Municipality.

\*The participation's name is not given because of the Law on Protection of Personal Data.



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## VI STAKEHOLDER IDENTIFICATION AND ANALYSIS

In order to develop an effective SEP, it is necessary to determine who is affected or likely to be affected (directly or indirectly) by the Project (“affected parties”); who may have an interest in the Project (“other interested parties”); and paying special attention to the identification of “disadvantaged/vulnerable individuals or groups”, who may be differentially affected by the Project, or because of their disadvantaged or vulnerable status, are experiencing difficulties in accessing project benefits, or participating on equal footing in consultations. In the process of stakeholder engagement, vulnerable/disadvantaged individuals/groups will be given special attention.

The following categories of stakeholders have been identified as being affected by or potentially interested in the project:

- **Affected Parties:**
  - **Directly Affected Stakeholders** are individuals/groups/organizations within the project potential Social Area of Influence (Aol) (see Figure II-3), who are directly affected (actually or potentially by the project, and/or identified as most susceptible to project related change, and who require close communication in determining the impacts and their significance, as well as making decisions regarding mitigation and management measures.
  - **Indirectly Affected Stakeholders** refer to other individuals/groups/organizations that may be positively or negatively affected by the scope of the project due to the location of the project.
- **Other Interested Parties** refer to individuals/groups/organizations with an interest in the project, which may be because of the project location, its proximity to natural and other resources, its characteristics, and its impacts, matters related to public interests or because of the sector or parties involved in the Project.
- **Disadvantaged/Vulnerable Individuals/Groups** refer to persons who, due to their vulnerability, may be disproportionately affected or more disadvantaged in accessing the project compared to other groups and may require special efforts to ensure their equal representation in the consultation and decision-making processes related to the project.

The Project Management Unit (PMU) of ILBANK implements the Project as Borrower, while WB provides technical and financial support as Lender. The owner and the main responsible organization of the Project is KOSKI, who is the Sub-borrower of the Project. The design and implementation of the Project at local is under the responsibility of KOSKI. The other responsible parties of the Project are the Supervision Consultant to assist KOSKI and the Contractor to be awarded for the project activities.

A summary for stakeholder categories is given in Table VI.1.

**Table VI.1 Stakeholder Categories**

Stakeholder Category	Stakeholder	Interests/Effects	Exposure
<b>Direct Stakeholders</b>	Residents within the borders of Doganhisar Municipality including the following neighborhoods: Aga Bas Cinaroba Cuma	Project's direct stakeholders	The project will eliminate the negativities experienced by the citizens living in the project area in terms of both wastewater treatment and will cause an increase in the quality of public health. The residents of close settlements will be affected by construction related impacts directly. Local communities that are directly affected by the environmental, social and economic aspects of the project, living within the project's impact area and vulnerable/disadvantaged groups within these



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Stakeholder Category	Stakeholder	Interests/Effects	Exposure
	Harman Kuz Pazar Sih Yegin and Yenice		communities are in this category.
	Public administrations directly involved at the National, Provincial and District Level	Institutions that have rights and/or responsibilities at the stages/activities within the life cycle of the project.	They are public institutions that have a high impact and importance for project activities and at the same time have a high level of being affected by the project.
Indirect Stakeholders	Public administrations indirectly involved at the National, Provincial and District Level	Public institutions that are not directly involved in the works within the scope of the project, but that may be indirectly affected / likely to be affected.	They are public institutions that have indirect impact and importance for project activities and at the same time have a possibility level of being affected by the Project due to the Project related activities.
	Local Businesses	Proximity to the Project Area	Local businesses in the vicinity of the area, where the project will be implemented, may experience nuisances resulted from the dust, noise and traffic that may occur during different project phases.
Other Interested Parties	Konya Selcuk University Necmettin Erbakan University Konya Technical University Chamber of Commerce (KTO) Karatay University Konya Food and Agriculture University	Academic Interest	The studies to be carried out within the scope of the project are within the academic interest of the relevant departments. It is a stakeholder group that is interested in the context of scientific aspects of the environmental, social and economic impacts of the project.
	Local Media	Local Interests	Local media organizations are the organizations that convey the environmental and social impacts of this project and the progress of the project to the local people through its tools.
	National media	Interest in the project itself and the positive/negative permanent/discontinuous overall impacts that the project produces	National media institutions are the organizations that convey the environmental and social impacts of this project and the progress of the project to the national level through its tools.
	Non-governmental organizations (NGOs)	NGOs with fields of activity covering project activities, project impacts or project-affected elements at national or local level.	National and local NGOs with working areas covering project activities, potential impacts of the project and/or PAP/stakeholders. Public institutions and organizations, and NGOs, which are the relevant parties of the project, are in this group.
Vulnerable/ Disadvantaged Individuals/ Groups	Disadvantaged / Vulnerable Individuals/Groups within the project area.	Proximity to the Project Area	Disadvantaged/vulnerable individuals or groups who may be differentially affected by the Project, or because of their disadvantaged or vulnerable status, are experiencing difficulties in accessing project benefits, or participating on equal footing in consultations

The list of stakeholders identified as being affected or potentially interested in the Project is presented in Table VI.2 below, and the stakeholder list is categorized as national, international and local. The possible additions/changes will be made to/on the list throughout the project



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implementation. It should be noted that people, who want to be informed about the Project, may contact ILBANK and/or KOSKI.

**Table VI.2 Project's Stakeholder List**

Stakeholder Category	Level of involvement	Definition	Organization / Entity	
Lender	International	International Institutions/Lenders	World Bank	
Direct	National	Ministries and Relevant Central Authorities	Ministry of Environment, Urbanization and Climate Change	
Indirect			Ministry of Agriculture and Forestry	
			Ministry of Health	
			Ministry of Energy and Natural Resources	
			Ministry of Family and Social Services	
			Ministry of Foreign Affairs	
Direct			Ministry of Labor and Social Security	
			General Directorate of Environmental Management	
			General Directorate of State Hydraulic Works (DSİ)	
Indirect			General Directorate of Water Management	
			Ministry of Interior Disaster and Emergency Management Presidency (AFAD)	
Other Interested Parties			NGOs	Chamber of Environmental Engineers
				Chamber of Agricultural Engineers
				Environment Foundation of Türkiye
				Environment Protection Foundation of Türkiye
	Nature Association			
	Turkish Foundation for Combating Soil Erosion, Reforesting and the Protection of Natural Habitats (TEMA)			
	Waste and Environmental Management Association (TAYCED)			
	Foundation for the Protection and Promotion of the Environment and Cultural Heritage (CEKUL)			
WWF Türkiye				
Indirect	Local	Governmental / Local Authorities and Agencies	Governorship of Konya	
Direct			Konya Metropolitan Municipality	
Indirect			Konya Regional Directorate of Cultural Heritage Preservation Board	
Direct			Konya Provincial Directorate of Environment, Urbanization and Climate Change	
			Konya Provincial Directorate of Agriculture and Forestry	
Indirect			Konya Provincial Directorate of Health	
			Doganhisar Municipality	
			District Governor of Doganhisar	
			Doganhisar Social Assistance and Solidarity Foundation	
			Provincial AFAD offices	
Other Interested Parties			NGOs	Related local NGOs (if any)
Direct			Residential Areas/Local Communities/Potentially Project Affected People	Aga Neighborhood
				Bas Neighborhood
				Cinaroba Neighborhood
				Cuma Neighborhood
	Harman Neighborhood			
	Kuz Neighborhood			
	Pazar Neighborhood			
	Sih Neighborhood			
	Yegin Neighborhood			
	Yenice Neighborhood			
Owners/Users of agricultural fields around the WWTP				



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Stakeholder Category	Level of involvement	Definition	Organization / Entity
Indirect			Farmers of the agricultural fields around the WWTP
		Business Enterprises	Related business enterprises within the Project Impact Area (if any)
Other Interested Parties		Universities	Selcuk University
			Necmettin Erbakan University
			Konya Technical University
			Konya Chamber of Commerce (KTO) Karatay University
Vulnerable/ Disadvantaged Individuals/Groups		Disadvantaged / Vulnerable Individuals / Groups within the project area.	Konya Food and Agriculture University
			People who receive support from social assistance
			Households with physically and/or mentally disabled family members
			Female-headed households
			Syrian Refugee Households

There are ten (10) main neighborhoods within the project area, namely Aga, Bas, Cinaroba, Cuma, Harman, Kuz, Pazar, Sih, Yegin and Yenice. These settlements are listed in Table VI.3 together with their populations.

**Table VI.3 Populations of Neighborhoods within the Project Area (TurkStat, 2021)**

Neighborhood	Population
Aga	188
Bas	370
Cinaroba	635
Cuma	154
Harman	1,313
Kuz	912
Pazar	906
Sih	721
Yegin	229
Yenice	726
<b>Total</b>	<b>6,154</b>

Participation of vulnerable/disadvantaged individuals/groups in stakeholder engagement activities is especially important for the construction phase of the project. It will also be considered if there is any need for women to be consulted via a particular way (e.g., if a women-only consultation is needed, or if consultation activities need to be tailored to a particular time of day to allow women to attend) in order to achieve a better stakeholder engagement for the project.

The potential vulnerable/disadvantaged individuals/groups can be listed as follows:

- Households with physically and / or mentally disabled family members,
- People with chronic diseases,
- Elderly people over 70 years of age who live alone and in need of care,
- Female-headed households,
- Households where the head of the household is a child,
- Households with low or no income, and
- Refugee households of Syrian origin.

In identifying vulnerable/disadvantaged individuals/groups, information obtained from formal/informal interviews and phone call interviews with representatives/key informants of neighborhoods within the project area was used. In addition, the guidance of the official authorities





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and public institutions in the region will help in identifying possible vulnerable/disadvantaged individuals/groups. Therefore, effective consultation and information sharing with these groups and solving their grievances are among the objectives of the SEP. The vulnerable/disadvantaged individuals/groups will be improved through the project development process.

The findings of the interviews are presented below:

- **Aga:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are ten (10) people, who receive support from social assistance and solidarity foundation. Two (2) of them are elderly people over 70 years of age, who live alone and need of care.
- **Bas:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are twenty (20) people, who receive support from social assistance. Three (3) of them are elderly people over 70 years of age, who live alone and need of care, while six (6) of them are physically and/or mentally disabled family members. Also, there are four (4) female-headed households.
- **Cinaroba:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are five (5) people, who are physically and/or mentally disabled family members.
- **Cuma:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are 15 people, who are elderly people over 70 years of age, who live alone and need of care. One (1) of them receives support from social assistance, while one (1) of them is physically and/or mentally disabled family member. Also, there are five (5) female-headed households.
- **Kuz:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are ten (10) people, who receive support from social assistance and solidarity foundation. Two of them are elderly people over 70 years of age, who live alone and need of care, while two of them are physically and/or mentally disabled family members. Also, there are two female headed households.
- **Pazar:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are six (6) people, who are physically and/or mentally disabled family members
- **Sih:** Among the residents, as vulnerable/disadvantaged individuals/groups, there are 12 people, who receive support from social assistance. One of them is physically and/or mentally disabled family member.

A summary of the needs of all stakeholders identified in the scope of the Project is analyzed and provided in Table VI.4.

**Table VI.4 Needs of Project Stakeholders**

Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
Harman Neighborhood	Households with low or no income	About 20 people	Official language	Oral information, written information, radio	Transportation to activities, childcare support during activities
	Physically disabled persons	About 10 people	Official Language	Oral information, phone, visit	Transportation to activities



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Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
	Women-headed household	About 40 people	Official Language	Oral information, phone, visit	Culturally appropriate means, childcare support during activities (women only consultation etc.) Daytime meetings
Pazar Neighborhood	Households with low or no income	About 15 people	Official language	Oral information, written information, radio	Transportation to activities, childcare support during activities



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## VII STAKEHOLDER ENGAGEMENT PROGRAM

All activities planned under this SEP will be programmed in accordance with some key principles, which are specified under the Stakeholder Engagement Framework in ESMF of SCP-II AF. First, all of the engagement activities will be planned in such a way as to maximize stakeholder engagement, in terms of both timing and participation, while avoiding interrupting the daily business of local stakeholders. Again, these activities will be planned in a way that encourages and ensures the equal participation of different stakeholders. All stakeholder engagement activities will be recorded, and the findings/feedback of the stakeholder consultation meeting held on 21<sup>st</sup> of September 2023 is incorporated in this SEP, whereas the findings/feedback of the future activities will be provided in the ESMRs. All relevant project documents will be shared with responsible parties and other stakeholders. All stakeholder engagement activities to be held within the project's scope will be notified to the local people, headmen, public institutions and organizations, and non-governmental organizations at least ten (10) days in advance. All supporting documents used during the stakeholder engagement activities (newspaper ads, list of attendees, full meeting minutes (as an annex), sample brochure, etc.) will be included in the SEP/ESMRs and disclosed at the Project's website.

Consultation activities programmed in accordance with the basic principles are presented in this section.

### VII.1 Methods for Information Dissemination and Stakeholder Consultation

ILBANK and KOSKI will use appropriate methods to disclose information about the planned Project, consult with stakeholders on potential benefits and risks of the planned project and the impact mitigation measures. Disclosure of relevant project information helps stakeholders to better understand the risks, impacts and opportunities associated with the proposed projects. Information will be disclosed using methods, which will be suitable for various groups of stakeholders at all project implementation stages. For all disclosure attempts, the guidance of WB OP 4.01 and World Bank's 2010 Policy on Access to Information will be followed and by doing so, the Project will be implemented in compliance with World Bank standards. The relevant means for consultations with stakeholders are provided in Table VI.4.

Written and oral comments of stakeholders will be recorded during the engagement activities via the minutes of meetings by KOSKI's social expert and a participation list will also be filled out in case the participants agree to. The participant lists and/or the forms to be used during consultation activities that include duties, e-mail addresses and contact numbers of the participants will be kept in the records and will be made publicly available after the respective lines containing personal data are blurred considering "The Law on The Protection of Personal Data".

The documentation, review and reporting back processes of all comments/concerns/grievances of the stakeholders is comprehensively addressed in Chapter IX and Chapter X.

After the stakeholder consultation meeting on draft ESMP, ESMP and SEP are finalized by incorporating the results of the stakeholder consultation meeting and the final ESMP and SEP will be published by ILBANK/KOSKI and on WB website.



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**Table VII.1 Stakeholders/Purpose of Communication / Type and Method of Communication**

Stakeholders	Purpose for Communication	Type and Method of Communication	Project Phase	Responsible Party
<p>Local communities/settlements in the area including the following neighborhoods:</p> <p>Aga Neighborhood Bas Neighborhood Cinaroba Neighborhood Cuma Neighborhood Harman Neighborhood Kuz Neighborhood Pazar Neighborhood Sih Neighborhood Yegin Neighborhood Yenice Neighborhood</p> <p>Farmers and owners of the agricultural fields around the WWTP</p> <p>Related local businesses near WWTP (if any)</p>	<p>Providing information on the nature of the proposed project, duration of the project, potential environmental, social and economic impacts/risks (positive and negative)</p> <p>Opportunities for the community to be actively involved in the project activities</p> <p>Mechanism / opportunities for suggestions and proposals (see Appendix 6: Sample Consultation Form)</p> <p>Discussions on the potential adverse impacts</p> <p>Monitoring targets and activities, and regular reporting back to stakeholders on monitoring results</p> <p>Informing the communities in line with the Workforce Management Plan (recruitment policy, procedures, process, trainings etc.) and other related plans to be implemented in different project phases such as Traffic Management Plan etc.</p>	<p>Information through the media: newspapers, local TV, Project Owner's website etc.</p> <p>Information about the prepared documents related to the project (ESMP and SEP).</p> <p>Stakeholder consultation meeting</p> <p>Grievance Redress Mechanism</p> <p>Group or individual meetings and interviews, surveys, polls and questionnaires, workshops, and/or focus groups on specific topic to identify impacts, agree and implement mitigation measures, project announcement (brochures, poster, notifications, etc.) as necessary</p> <p>Official correspondence and meetings to provide information on project progress and issues that concern local communities and providing direct information</p>	<p>Construction and/or Operation phase</p>	<p>KOSKI/PIU</p> <p>E&amp;S Consultant</p> <p>Supervision Consultant and/or contractor</p>
<p>Vulnerable/Disadvantaged Groups/Individuals (Female-headed households and elderly people have been identified as vulnerable/ disadvantaged groups.)</p>	<p>Providing information on the nature of the proposed project, duration of the project, potential environmental, social and economic impacts/risks (positive and negative)</p> <p>Opportunities for the community to be actively involved in the project activities</p> <p>Mechanism / opportunities for suggestions and proposals (see</p>	<p>Information through the media: newspapers, local TV, Project Owner's website, etc.</p> <p>Information about the prepared documents related to the project (ESMP and SEP)</p> <p>Stakeholder consultation meeting</p> <p>Grievance Redress Mechanism</p>	<p>Construction and/or Operation phase</p>	<p>KOSKI/PIU</p> <p>E&amp;S Consultant</p> <p>Supervision Consultant and/or contractor</p>



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Stakeholders	Purpose for Communication	Type and Method of Communication	Project Phase	Responsible Party
	Appendix 6: Sample Consultation Form)	<p>Group or individual meetings and interviews to identify impacts, agree and implement mitigation measures, surveys, polls and questionnaires, workshops, and/or focus groups on specific topic project announcement (brochures, poster, notifications, etc.) as necessary</p> <p>Official correspondence and meetings to provide information on project progress and issues that concern local communities and providing direct information</p> <p>Face-to-face information sessions for vulnerable/ disadvantaged individuals/groups</p>		
Interested national and local NGOs  Other interested organizations will be added, as identified throughout the life of the project	<p>Providing information on the nature of the proposed project, duration of the project, potential environmental, social and economic impacts (positive and negative)</p> <p>These organizations can potentially help to identify key issues pertaining to the local community (vulnerable/disadvantaged groups) and the local environment</p>	<p>Information through the media: newspapers, media, Project Owner's website, face to face, etc.</p> <p>Information about the Project (ESMP, SEP)</p> <p>Stakeholder consultation meeting</p> <p>Grievance Redress Mechanism</p>	Construction and/or Operation phase	<p>Contractor</p> <p>KOSKI/PIU</p> <p>E&amp;S Consultant</p> <p>Supervision Consultant</p>
AFAD Local emergency services, fire brigades, utility owners and operators, local police, coast guard, health services	Inform relevant local authorities about project and undertake official correspondence when needed	Official correspondence and meetings to prepare for and coordinate activities during construction	Construction and/or Operation phase	<p>Contractor</p> <p>KOSKI/PIU</p> <p>E&amp;S Consultant</p> <p>Supervision Consultant</p>
Local and Central Governmental Institutions/Agencies	Informing regarding Project progress and undertake official correspondence	Official correspondence and meetings, information disclosure	Construction and/or Operation phase	Contractor



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Stakeholders	Purpose for Communication	Type and Method of Communication	Project Phase	Responsible Party
	Getting necessary approvals/opinions during project execution, State environmental inspections Informing about Chance Find Procedure and notification process for any findings	and consultation reporting, monitoring, permit requests		KOSKI/PIU E&S Consultant Supervision Consultant
ILBANK	Providing information on the nature of the proposed project, duration of the project, potential environmental, social and economic impacts (positive and negative)	Official correspondence and meetings to prepare for and coordinate activities during construction	Construction and/or Operation phase	Contractor KOSKI/PIU E&S Consultant Supervision Consultant



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Some recommended remedial measures regarding the above-mentioned vulnerable/disadvantaged individuals/groups are summarized below:

- Providing translation for the refugees who do not understand/speak Turkish,
- Providing written materials related to Project information in larger fonts and in Braille system, when/where needed,
- Choosing accessible venues for the consultation events and/or providing transportation for the people in remote areas (for example, in villages),
- Organizing small events or meetings for the vulnerable/disadvantaged people depending on their sensitivity, when/where needed (for example, a small meeting for deaf individuals accompanied by a sign language expert),
- Organizing the events/meetings or consultation processes with the vulnerable/disadvantaged groups in coordination with the relevant NGOs (if any) (for example, for physically disabled people, organizing the meeting/event with the help of Solidarity Association of Physically Disabled),
- The timing of the consultation events will be arranged in a way that the working stakeholders can participate. For those who cannot participated even though the timing is arranged, brochures, an active web page, social media, face-to-face individual meetings etc. could be organized.

## VII.2 Consultation Documentation

In the scope of stakeholder consultations with the project affected groups and NGOs, it is required to hold one (1) stakeholder consultation meeting as per WB OP 4.01. Within the scope of the ESMP studies, a stakeholder consultation meeting was held on 21<sup>st</sup> of September 2023.

Detailed information about the stakeholder consultation meeting on the 21<sup>st</sup> of September, 2023 is given in Chapter **Hata! Başvuru kaynağı bulunamadı..** The stakeholder consultation meeting has been carried out by following the steps below, which will be also applicable for the future meetings.

### **Place and Date of Stakeholder Consultation Meetings**

When the date and place of the consultation meeting are clarified, the common practice of the Project is to announce the date and place through the local media, the Notice Board of the KOSKI, in public places such as mosques, schools, etc. and an information text sent to the neighborhood mukhtars. All stakeholder consultation meetings to be held within the project's scope will be notified to the local people, headmen, public institutions, organizations, and non-governmental organizations at least ten (10) days in advance. The announcement methods preferred for the stakeholder consultation meeting held on 21<sup>st</sup> of September 2023 are given in Table VII.2 and this sample table will also be used for the future meetings.

Table VII.2 Details of Planned Stakeholder Consultation

No	Location	Notes	Public Hearing
1	Doganhisar District	Announcement of stakeholder consultation has been published on media (local and/or national newspaper) Announcement has been placed at the Notice Board of KOSKI Non-technical Summary of the Draft ESMP Report has been disclosed via web site.	Indicative: 08.09.2023







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### VII.3 Schedule and Timetable

Detailed information regarding the proposed stakeholder engagement program throughout the project phases is provided in Table VII.3. As stated in Table VII.3 below, the purpose of this planned process is to inform all stakeholder groups about the progress of the project, to share the relevant environmental and social reports with them, and to ensure that they are also aware of the progress of suggestions and grievances received from them. If the activities planned in this process are reshaped according to the changes experienced in the lifecycle of the project, these changes will also be detailed in this SEP and the other relevant project reports.

**Table VII.3 Proposed Stakeholder Engagement Program during Project Implementation**

Activity and Documents of Disclosure	Method	Responsibility	Timing
<b>Pre-construction Phase (2022)</b>			
Promotion of Project timeline activities, ESMP, SEP Grievance Redress Mechanism	Face to face meeting, Public presentation, Media announcements	KOSKI/PIU (Project Implementation Unit)	One month before the commencement of construction works
Informing the local population and relevant NGOs on the various aspects and activities in all phases of the project	Distribution of printed documents such as final approved ESMP, SEP and other related documents (by KOSKI) to the municipality, NGOs, local community offices, etc.	KOSKI/PIU	Continuous as relevant
Disclosure of Environmental and Social Management Report (ESMR)	KOSKI Website Official correspondence to ILBANK and WB	KOSKI/PIU	Annually
<b>Construction Phase (2023-2024)</b>			
Setting of Bulletin Boards on project's public locations	Bulletin Boards Announcements	KOSKI/PIU	At most a week before the commencement of construction works at public locations
Informing the local population on the various aspects and activities in construction phase of the project - Project information - scope and rationale and E&S principles - Coordination activities - Grievance Redress Mechanism	Bulletin Boards Announcements, Website announcements, Public presentations, local authority visits, meetings, etc.	KOSKI/PIU Contractor	On demand
Setting notices on Bulletin Boards on a weekly / monthly base	Bulletin Boards Announcements	KOSKI/PIU Contractor	Weekly and monthly updates
Meetings with Local Government and NGOs and local settlement representatives - Project information - scope and rationale and E&S principles - Coordination activities - Grievance Redress Mechanism	Meetings, Media announcements, etc.	KOSKI/PIU Contractor	Biannually/ As requested
Disclosure of ESMRs	KOSKI Website Official correspondence to ILBANK and WB	KOSKI/PIU Contractor	Biannually
<b>Operation Phase (2024-)</b>			
Public announcements	Media announcements	KOSKI/PIU	Continuous as relevant
Disclosure of ESMRs Grievance Redress Mechanism	KOSKI Website Official correspondence to ILBANK and WB	KOSKI/PIU	Annually



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The details of the stakeholder engagement activities will be recorded in Table VII.4.

Table VII.4 Sample Table for Stakeholder Engagement Log

Project Phase	Date and Location	Method Used	Purpose of Activity	Target Stakeholders	Meeting Summary / Key Issues Raised	Follow-up Actions	Information Shared/ Documents Disclosed and Consulted

### VII.3 COVID-19 Conditions

The COVID-19 epidemic has affected the whole world and measures such as wearing masks and maintaining social distance in society have become the new normal of our daily lives. If the COVID-19 pandemic conditions continue during the phases of the project and the implementation of this SEP, the stakeholder engagement plan and its activities will be aligned and implemented in accordance with the guidelines of relevant and responsible national and international organizations such as World Health Organization (WHO), Ministry of Health's (MoH) "Guidance to Covid-19 Outbreak Management and Working" and MoEUCC.

Within the scope of SEP, face-to-face meetings will be held in accordance with mask and social distance rules of MoH and WHO. In cases where face-to-face meeting is not possible due to the COVID-19 conditions, online interview methods can also be used along with other online disclosure and communication methods mentioned in Table VII.3. In addition, it will be ensured that the meetings to be held will be organized in open areas, in accordance with social distance and other regulations of MoH and WHO.

Apart from these measures, other practices outlined in "Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of Covid-19" notes will also be used on planning stakeholder engagement activities.



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## VIII ROLES AND RESPONSIBILITIES

The anticipated activities in the SEP will be conducted and completed in different phases of the Project by KOSKI/ Project Implementation Unit (PIU) in coordination with ILBANK. In activities such as the grievance redress mechanism, KOSKI/PIU will be responsible for following requests, suggestions and complaints, and in the upcoming process, in line with the requirements in the construction and operation contracts, the contractor(s) and sub-contractors will be also responsible for implementing some of the stakeholder engagement activities (such as the grievance redress mechanism) in accordance with the OP 4.01, WB 2010 Policy on Access to Information. Organizational structure of KOSKI can be accessed from its website (<https://www.koski.gov.tr/koski/kurumsal-yapi>).

TUMAS & ENCON Joint Venture, who prepared this SEP and the ESMP for the Project for the approval of ILBANK and WB, is the E&S Consultant; and provided the necessary information to the Municipality and took part in organizing the stakeholder consultation meeting (ESMP introduction meeting) held for the public and NGOs and finalized this SEP and the ESMP as per the concerns/opinions of the stakeholders of the Project.

The implementation of this SEP will be conducted and monitored by KOSKI. A PIU will be established to carry out operational and administrative tasks. The PIU staff will be the KOSKI's own staff. In addition, KOSKI/PIU's social expert will act as the Social Affairs Manager of this project. The social expert will also manage the grievance redress mechanism and stakeholder engagement.

The roles and responsibilities mentioned above within KOSKI are given in Table VIII.1

Table VIII.1 Structure of KOSKI/PIU

Occupation	Number	Duty in PIU
Mechanical Engineer	1	Head of PIU
	2	Technical Unit
Civil Engineer	1	Branch Manager/Technical Unit
	1	Technical Unit
Electric and Electronic Engineer	1	Branch Manager/Technical Unit
	1	Technical Unit
Environmental Engineer	1	Technical Unit
	1	Social Expert
Officer	2	Procurement Specialist
	1	Financial Expert
Financial Manager	1	Branch Manager
Industrial Engineer/Class A OHS Expert	1	OHS Expert

The Social Affairs Manager will perform the following functions:

- Ensuring that stakeholder engagement is properly understood by all municipal employees, contractors, consultants and subcontractors,
- Managing the public disclosure process of all stakeholder engagement activities,
- Monitoring of stakeholder engagement activities, complaints and feedback processes carried out within the scope of SEP,
- Ensuring the implementation of processes related to GRM and stakeholder engagement,
- Processing, managing and tracking grievances, including ensuring timely responses to and closure of grievances,
- Controlling over the implementation of the corrective actions to remedy grievances,



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- Regular reviewing and if necessary, updating the SEP and stakeholder engagement mechanism to ensure that it is effective and reflects Project circumstances and to minimize the problems that may occur in the implementation of this document.
- Participation in discussion on responses and the resolution of disputes,
- Assisting the implementation, recording and reporting of stakeholder engagement activities defined in this SEP,
- Assistance in the preparation of the Environmental and Social Monitoring Reports (ESMRs).

The Supervision Consultant, to be selected via tender process to be carried out by the Project Owner and approved by ILBANK for implementation of this SEP and ESMP of the project during the construction phase of the project, will have at least one Environmental Expert, one Social Expert and one Occupational Health and Safety Expert in its team.

Supervision Consultant will be responsible for identification and management of environmental, social and occupational health and safety (OHS) related impacts/risks and will ensure initiation of corrective actions where necessary.

Supervision Consultant team has following duties;

- Supervising whether all the conditions and rules in the ESMP/SEP document, which is a part of the contract document, are implemented
- Reviewing the SEP document to redefine the stakeholders directly or indirectly affected and/or interested in the Project, if required, and following up the implementation of the methods, instruments, timing and participation levels identified in the SEP
- Interviewing KOSKI and others involved in the stakeholder engagement process to review progress and identify critical issues
- Reviewing grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other Project activities and to reveal actions
- Interacting with various stakeholders to get their views on SEP implementation
- Taking part in stakeholder engagement activities
- Meeting with WB safeguards and auditing teams and responding to queries as necessary

The Contractor will adhere its responsibilities specified in this SEP and ensure that he/she is aware of its duties and responsibilities within this SEP and the ESMP for compliance with national legislation and WB Safeguard Policies. The Contractor will be responsible for the preparation and submission of regular monthly ESMRs on the environmental, social and OHS issues of the Project during the construction phase. Moreover, during the construction phase, the Contractor will employ a social expert, who will instruct and consult the workers on the implementation of grievance redress mechanism and the applicable stakeholder engagement activities detailed in this SEP in accordance with KOSKI's social expert and ILBANK PMU.

Project Management Unit (PMU) of ILBANK, the Borrower, has the following duties:

- Supervising and monitoring the implementation of environmental and social safeguard policies during project process
- Visiting project sites on occasion, and as required, as part of project supervision
- Reviewing the documents related to the environmental and social assessment of the project, provide comments to consultants, and giving official approval to these documents and procedures in accordance with the WB safeguards requirements
- Performing an overall quality assurance function that the EA documents prepared meet WB requirements



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As a project financing institution, WB has following responsibilities:

- Auditing the Project Owner's compliance with the provisions set out in the ESMP/SEP managed by the Project Owner during the construction and operation phase via the ESMRs to be submitted by ILBANK every six months
- Visiting project sites on occasion, and as required, as part of project supervision.

The operation regarding these activities is not particularly separated from the ongoing work of the PIU and KOSKI. In this context, the activities planned in this SEP, the timing, frequency, schedule, methods and responsibilities for all these stakeholder engagement activities will be carried out in accordance with the ESMP of the project and, if necessary, will be revised during the progress of the project.



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## IX GRIEVANCE REDRESS MECHANISM

### IX.1 Purpose of Grievance Redress Mechanism

The purpose of this mechanism is to establish a system for handling, evaluation and resolution of all kinds of grievances, concerns, queries and proposals of the affected communities and other stakeholders, such as construction workers, regarding the project activities (mainly construction). During the project implementation process, grievances will be addressed at mainly three (3) levels; (i) to the Construction Contractor/Operator at local (site) level, (ii) to the KOSKI/PIU (involving also Konya Metropolitan Municipality, ILBANK, CIMER and YIMER) at national level and (iii) to World Bank at international level.

Managing grievances, including avoiding and minimizing them as well as effective handling, is an integral part of a sound stakeholder engagement strategy. Experience shows that significant numbers of grievances arise from misunderstandings, and that such grievances can be avoided, or their numbers reduced, through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating into grievances.

In accordance with WB OP 4.01, a process is established by which people who deem that they have been adversely affected by the Project during planning, construction or operation can bring grievances to the Project for consideration and, if required, resolution. A specific Project grievance redress mechanism is beneficial in addressing community and individual concerns and complaints before they escalate beyond control.

### IX.2 Principles of Grievance Redress Mechanism

Within the scope of the project, the principles of the grievance redress mechanism can be listed as follows:

**Legitimate:** A mechanism will have clear, transparent, and sufficiently independent governance structures to ensure that no party to a particular grievance process can interfere with the fair conduct of that process.

**Accessible:** A mechanism will be publicized to those who may wish to access it and provide adequate assistance for aggrieved parties who may face barriers of access, including language, literacy, awareness, finance, distance, or fear of reprisal.

**Predictable:** A mechanism will provide a clear and known procedure, with time frames for each stage; clarity on the types of process and the outcome it can (and cannot) offer; and means of monitoring the implementation of any outcome.

**Equitable:** A mechanism will ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.

**Rights-based:** A mechanism will ensure that its outcomes and remedies accord with internationally recognized human rights standards.

**Transparent:** A mechanism will provide sufficient transparency of process and outcome to meet the public interest concerns at stake and should presume transparency wherever possible.

**Anonymity:** A mechanism will provide means by which all individuals are able to raise anonymous complaints. This gives the applicants confidence that they will not be retaliated (see below) against for raising concerns.



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**Non-retaliation:** Every person or stakeholders have right to provide feedback or to raise a complaint, whether positive or negative. Any attempt of retaliation against a complainant is considered as misconduct and will be investigated.

**Timely response:** A mechanism will reply quickly enough to be useful in taking subsequent action related to the project.

**Adequate response:** A mechanism will reply with the requested information, or other appropriate information in an understandable form.

### IX.3 Responsible Parties

KOSKI/PIU and the Contractors are responsible for implementing the grievance redress mechanism during the construction activities, where KOSKI is responsible for both the construction and operation phases. The PIU of KOSKI, together with contractors and supervision consultants, has to ensure that grievance redress mechanism is implemented effectively.

The GRM Officer of the Contractor is responsible to receive and manage the grievance process and actions to be taken to resolve incoming grievances, as well as reporting to the PIU/KOSKI. The relevant records will be kept and reported to KOSKI with the supervision of Supervision Consultant.

Under the PMU of the ILBANK Department of International Relations, the GRM Team was created with the assistance of expert/technical experts and technical group managers. The responsibilities of the technical group manager are to ensure the implementation of the indicated procedures and to lead the grievance closure process when multi-dimensional work is needed.

The Supervision Consultant, who will be selected by tender process to be opened by the Project Owner and approved by ILBANK, will take part in the management of the GRM and regularly monitor the reporting of complaints to the Project Owner and Contractor. The Supervision Consultant will also take part in stakeholder engagement activities to assist KOSKI and the Contractor to be awarded for the project.

### IX.4 Grievance Procedure

The Grievance Redress Mechanism (GRM) is a process that allows any stakeholder to file a complaint, raise a concern or provide opportune feedback regarding the planning, implementation or the management of a project.

#### Contractor GRM at Local (Site) Level

Project specific grievance redress mechanism will be adopted and used by Contractor during the construction phase of the Project. All grievances related to the Project will be evaluated and responded. The grievance redress mechanism will serve for both internal (such as employees of Contractor) and external stakeholders. Any individual or organization may make enquiries and/or lodge complaints personally. The communication channels will be determined by Contractor for lodging both internal and external grievances.

#### KOSKI GRM at National Level

A GRM has been established by KOSKI to facilitate and ensure that people or communities who have been impacted or fear adverse effects from the project will have access to and be heard and assisted by the project with effective and timely resolution to their concerns. The most important point in the grievance redress mechanism is to ensure that all complaints are effectively received, recorded,



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resolved and responded to by the PIU on a predetermined timetable and according to their content, and to ensure that the corrective / regulatory action to be taken is acceptable to both parties.

Currently, KOSKI uses a hotline "185" at present, which is accessible 24/7 for any emergencies, and communication link through the website of KOSKI, which also offers people to follow up their complaints. The following project specific grievance redress mechanism will be adopted and used by KOSKI/PIU during both the construction and operation phases of the Project. The grievance redress mechanism will serve for both internal (such as employees of KOSKI and contractor) and external stakeholders. KOSKI will ensure that an internal GRM for the Project employees will be available to both direct and contracted workers to allow them to raise their workplace related concerns and grievances.

Any individual or organization may make enquiries and/or lodge complaints personally. The following communication channels could be used for lodging both internal and external grievances.

- Telephone (Toll Free Hotline; 185 and KOSKI line; +90 332 221 61 00),
- Individual application to KOSKI: (Ihsaniye Mah., Kazim Karabekir Cd. No :56 , 42060 Selcuklu/Konya)
- Website (<https://www.koski.gov.tr/sayfa/bize-yazin>) and e-mail of KOSKI ([bilgi@koski.gov.tr](mailto:bilgi@koski.gov.tr))
- On the KOSKI website contact page, complainants will also be able to submit their ideas/requests/complaints via the "Information Acquisition", "Message to the General Director" and "e-Petition" tabs (see Figure IX-1)
- In addition, necessary information can be obtained from the announcements and malfunctions / interruptions page on the KOSKI website.
- Grievance Boxes at construction sites (mainly for internal grievances from workers) and related neighborhoods' Mukhtars office and/or selected points,
- Direct contact with gate keepers and GRM Officer at construction sites,
- Meetings and formal/informal consultations.

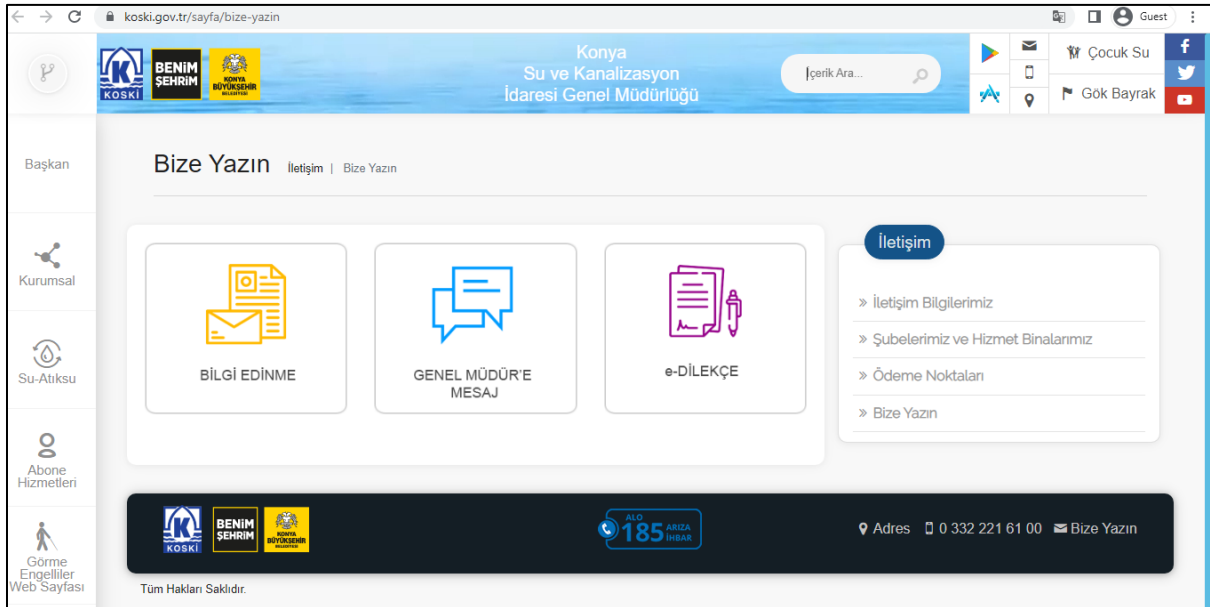


Figure IX-1 Screenshot of KOSKI Website

## ILBANK GRM at National Level





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ILBANK's GRM procedure has been prepared in line with ESF/ESS10<sup>1</sup>. It also complies with the World Bank's environmental and social standards. ILBANK has a policy in this regard, and it is shared on its website<sup>2</sup>. ILBANK International Relations Department, GRM Team, through the following communication tools:

- Website : <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- E-mail: [bilguidb@ibank.gov.tr](mailto:bilguidb@ibank.gov.tr) and [etikuidb@ilbank.gov.tr](mailto:etikuidb@ilbank.gov.tr)
- Phone number: +90 312-508 79 79
- Address for Official Letter: ILBANK Department of International Relations, GRM Team (letters must be marked as personal or confidential) - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

### CIMER and YIMER GRMs at National Level

Apart from the means of Grievance Redress Mechanism presented by the Project Owner as mentioned above, all internal and external stakeholders, who are not satisfied with the solutions offered by the Project's Grievance Redress Mechanism or have requests for a higher-level explanation could apply following means at the national level:

- **Presidency's Communication Center:** The Presidency's Communication Center (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
  - Website: [www.cimer.gov.tr](http://www.cimer.gov.tr)
  - Call Centre: 150
  - Phone number: +90 312 525 55 55
  - Fax number: +90 312 473 64 94
  - Address for Official Letter: Republic of Türkiye, Directorate of Communications Kizilirmak Mah. Mevlana Bulvarı No:144 ÇANKAYA/ANKARA
  - Individual applications: Community relations desks at governorates, ministries, and district governorates.
- **Foreigners Communication Center:** The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.
  - Website: [www.yimer.gov.tr](http://www.yimer.gov.tr)
  - Call Centre: 157
  - Phone number: +90 312 157 11 22
  - Fax number: +90 312 920 06 09
  - Address for Official Letter: Republic of Türkiye General Directorate of Migration Management, Camlica Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA
  - Individual applications: Republic of Türkiye General Directorate of Migration Management.

If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follows:

- Civil Courts of First Instance
- Administrative Courts

<sup>1</sup> WB's ESSs <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

<sup>2</sup> ILBANK's GM Policy [https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank\\_gm\\_policy\\_1646748212.pdf](https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_gm_policy_1646748212.pdf)



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

Certain complaints warrant urgent action, and the regular GRM procedure may be inappropriate or too slow to prevent an issue from escalating. A separate fast-tracked GRM, including guidance on the circumstances under which it should be employed, can help ensure that high-priority complaints are dealt with in a timely manner. In the case of complaints alleging serious harm or risk of harm, and/or serious rights violations, the GRM's standard operating procedures will call for a fast-track response, whether by the GRM or by immediate referral to another office or organization and immediate notification to the complainant of that referral.

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

### **WB Redress Service at International Level**

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

Project affected communities and individuals may submit their complaint to the Bank's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the Bank's corporate Grievance Redress Service (GRS), please visit: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

The step-by-step internal and external grievance process to be adopted is provided in flowchart in Table IX.1. The sample form for Grievance Register is given in Appendix-3, whereas, the sample forms to be used by KOSKI/PIU's Social Affairs Manager, GRM Officer of the Contractor and/or PIU members responsible for GRM are the grievance form, grievance closeout form and consultation form that are presented in Appendix-4, Appendix-5 and Appendix-6, respectively. In addition to the grievance register provided in Appendix-3, a database for grievance logging will also be included in the GRM.

**Table IX.1 Grievance Redress Mechanism Flowchart**



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Grievance Process	Requirement / Action	Responsible Party
<b>Submission of a complaint</b>	<p>Receiving the grievance by any communication channel explained above.</p> <p>(At this point, if the complaint is a sensitive grievance involving child abuse, sexual exploitation and abuse/sexual harassment (SEA/SH) or Gender Based Violence (GBV), immediate action will be taken within 48 hours after receiving the complaint). For the cases relevant to SEA/SH at workplace or any potential child abuse in the project sites, the complaint will be directed by the GRM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office").</p>	<p>KOSKI/PIU</p> <p>Contractor</p> <p>Supervision Consultant</p>
<b>Registration of complaint</b>	<p>Registering/recording through making an entry in the grievance register (see Appendix-3 for a sample) and filling of the Grievance Form (see Appendix-4). All the complaints will be registered within two (2) working days, and feedback will be given to the complainant and detailed information about the complaint may be requested from the complainant within this period. Moreover, the details of implemented stakeholder engagement activities will be recorded in a Stakeholder Engagement Log (see Table VII.4).</p> <p>If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.</p>	<p>KOSKI/PIU</p> <p>Supervision Consultant</p>
<b>Forwarding of complaint</b>	<p>The complaint is forwarded to the relevant persons (GRM Officer on construction sites and experts of the PIU) responsible for handling the complaint in not later than three (3) working days upon receiving the complaint (except for any emergent complaint, which would be handled as appropriate).</p>	<p>KOSKI/PIU</p> <p>Contractor</p> <p>Supervision Consultant</p>
<b>Evaluation of a complaint</b>	<p>Evaluating the complaints within ten (10) working days and determining whether the complaint meets the admissibility criteria. If the complaint is not valid, providing relevant explanation to the complainant.</p>	<p>KOSKI/PIU</p> <p>Supervision Consultant</p>
<b>Response for a complaint</b>	<p>If the complaint is valid, identifying and taking corrective measures for resolving the complaint in not later than fifteen (15) working days upon receiving. If an agreement cannot be reached on the closure of the complaint, the complainant will be informed that he/she may apply ILBANK, CIMER, YIMER and other legal remedies. After the notification of this process, the Grievance Closeout Form will be filled (see Appendix-5).</p> <p>All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.</p> <p>At this point, it should be noted that the action taken and the result of this anonymously recorded grievance will be shared on the KOSKI website, so that anonymous complainant is informed about their complaint and the results.</p>	<p>KOSKI/PIU</p> <p>Supervision Consultant</p>
<b>Recording the result of a complaint</b>	<p>Recording the result of the complaint in grievance register (see Appendix-3).</p>	<p>KOSKI/PIU</p> <p>Supervision Consultant</p>



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Grievance Process	Requirement / Action	Responsible Party
Right to Appeal	If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follows: <ul style="list-style-type: none"><li>• Civil Courts of First Instance</li><li>• Administrative Courts</li><li>• Commercial Courts of First Instance</li><li>• Labor Courts</li><li>• Ombudsman (<a href="https://ebasvuru.ombudsman.gov.tr/">https://ebasvuru.ombudsman.gov.tr/</a>)</li></ul>	KOSKI/PIU ILBANK Supervision Consultant

KOSKI/PIU has toll free hotline 185 and receiving the grievances and the Construction Contractor will forward the grievances to KOSKI.

In addition, the Construction Contractor has an existing grievance redress mechanism to handle the complaints received from workers. The Construction Constructor aims:

- To ensure that existing mechanism for all construction contractors' workers to share their thoughts and complaints regarding their working conditions is used properly.
- To ensure that the repetition of complaints related to the same issues will be prevented
- To have an active and transparent engagement with workers aiming for solving concerns at an early stage of dispute

Basic steps in a grievance redress mechanism are explained in Figure IX-2.



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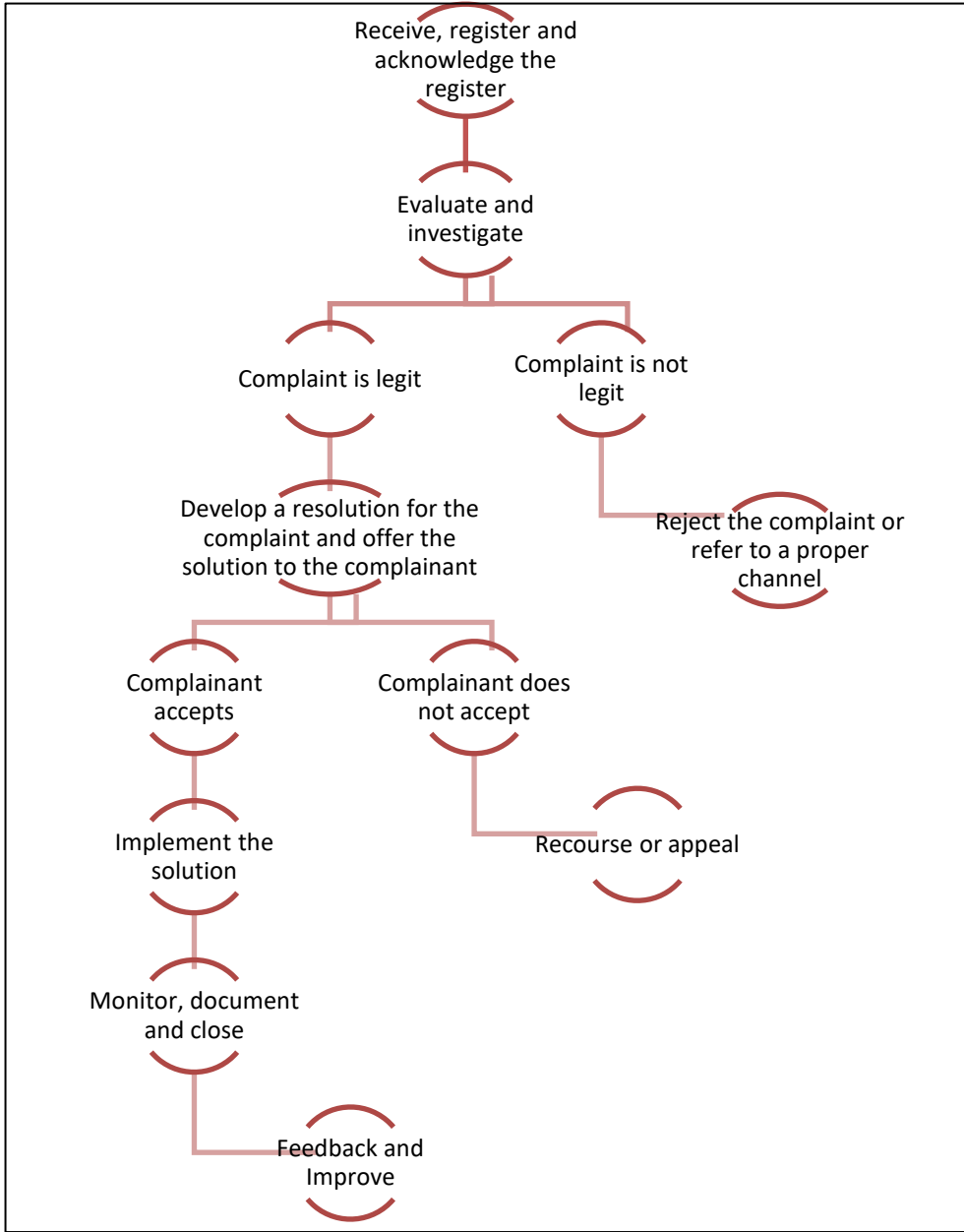


Figure IX-2 Sample Grievance Redress Mechanism for Workers

The grievance form and grievance register will be available at the construction site and will be available for the experts following the inquiries at the PIU/KOSKI.



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## X MONITORING AND REPORTING

This SEP is a living document, which will be updated periodically (at least once in every six months) to record consultations undertaken, issues raised, actions taken; to describe lessons learned and any changes to the consultation process; and to outline the schedule for on-going and future interaction. KOSKI will inform ILBANK on any changes made in SEP.

KOSKI/PIU will monitor participation of the stakeholders in the planned engagement activities. Through evaluation of outcomes and effect of engagement, PIU intends to obtain regular feedback from stakeholders via some of the planned engagement activities which are given in Chapter VII and effective usage of Grievance Redress Mechanism and its different communication tools, which are given in Chapter IX and to learn if the planned outcomes are achieved or if there is a need for changing the approach. Additionally, Key Performance Indicators (KPIs) to be targeted for this SEP during the construction and operation phases of the project are given in Table X.1.

**Table X.1 Key Performance Indicators (KPIs) for SEP Monitoring**

Parameter	Key Performance Indicator	Target	Project Phase	Assessment Frequency	Responsibility
Internal Grievances (mainly from workers.)	Number of Grievances Received (by gender and category of grievance) Number of Open or Closed Grievances Average Grievance Closeout Time Types of Grievances Number of Invalid Grievances (Grievance forms, other online and offline communication methods, etc.)	Decrease in number of grievances received Increase in grievance closeout rate (closed grievances /total number of grievances) Decrease in time of grievance closeout Zero grievances not closed out within the target timeframe. Target closeout rate of total grievances: 90%	Construction	Monthly	KOSKI/PIU Contractor
			Operation	Quarterly	KOSKI/PIU
External Grievances	Number of Grievances Received (by gender and category of grievance) Number of Open or Closed Grievances Types of Grievances Average Grievance Closeout Time Number of Invalid Grievances (Grievance forms, database, other online and offline communication methods, etc.)	Decrease in number of grievances received Increase in grievance closeout rate (closed grievances /total number of grievances) Decrease in time of grievance closeout Zero grievances not closed out within the target timeframe. Target closeout rate of total grievances: 90%	Construction	Monthly	KOSKI/PIU Contractor
			Operation	Quarterly	KOSKI/PIU
Stakeholder Engagement Activities	Number of planned Stakeholder Engagement Activities	Increase in the number of activities carried out	Construction	Monthly	KOSKI/PIU Contractor



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Parameter	Key Performance Indicator	Target	Project Phase	Assessment Frequency	Responsibility
	Type of planned Stakeholder Engagement Activities	Increase in the number of participants	Operation	Quarterly	KOSKI/PIU
	Number of participant stakeholders	Increase in the number of different types of stakeholders (as group or person)			
	Type of participant stakeholders	Increase in the number of activities carried out			
	(Activity records, meeting minutes, participant records and related reports, documents, etc.)				

Throughout the Project, KOSKI/PIU will communicate with stakeholders and inform them about any significant issues, for example, changes in the project schedule. Any additional stakeholders identified during the lifetime of the Project will also be added to the stakeholder list and communication with them will be initiated. Improvements, upgrades and all environmental and social issues will be timely communicated via the methods outlined in Chapter VII of this SEP.

The feedbacks received from communities, local authorities, landowners, other companies, NGOs, media, academic institutions and other interest groups on a systematic basis through an effective consultation and grievance redress mechanism, which is developed will be registered and reported by KOSKI during the construction and operation phase.

Monthly summaries/reports regarding the grievances, queries, and related incidents together with the implementation status of corrective/preventive actions will be prepared by the contractor throughout the construction phase and by KOSKI during the operation phase. These summaries will be incorporated to monthly ESMRs, which will be prepared by the Contractor in the construction phase of the project to be submitted to the Municipality. In addition, the Contractor should convey the grievances immediately to the Project Owner besides summarizing them in Monthly ESMRs. The monthly summaries/reports will be a means to assess both the number and nature of complaints (if any), along with KOSKI's and contractor/s' ability to address complaints in a timely and effective manner. As for the incidents, the Contractor is responsible for immediate notification of the contingencies such as environmental, social and labor issues or accidents, incidents or loss of time to the Project Owner and keeping an event log on site throughout the lifetime of the project.

Monthly ESMRs will be prepared by the Contractor to be submitted to KOSKI. Quarterly ESMRs and semiannual Project Progress reports will be prepared by KOSKI, to be submitted to ILBANK together with the Grievance Register. Semiannual ESMRs and Project Progress reports will be prepared by ILBANK to be submitted to WB. These reports will include a summary of the Project's performance on management of health, safety, environment and social issues, grievance redress mechanism and stakeholder engagement activities conducted during the specified period. All work done within the GRM will be documented with the forms and logs in this SEP and will be evaluated and reported according to the determined KPI targets. It should also be noted that the personal information of the complainant having used the GRM will remain confidential and will never be shared in these reports.


In these reports, stakeholder engagement activities can be presented in a tabular format (see Table VII.4) listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action.



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## APPENDICES

### APPENDIX 1: EIA Exemption Letter



T.C.  
ÇEVRE VE ŞEHİRCİLİK  
BAKANLIđI

T.C.  
KONYA VALİLİđİ  
Çevre ve Şehircilik İl Müdürlüđü

Sayı : 47342952-220.03-E.11491  
Konu : ÇED muafiyeti. 04.08.2017

**KONYA SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĐÜNE**  
Niřantař Mh. Vatan Cd. 2/A 42060 Selçuklu/KONYA

İlgi : a) Sartes Müh. Taah. San. ve Tic. A. Ş. 'nin 27/07/2017 tarihli dilekçesi.  
b) 04/08/2017 tarihli ve 78305 Referans No'lu Başvuru.

İlimiz Dođanhisar İlçesi Pazar Mh. Bozyer (171 Ada, 134 ve 136 Parsel) mevkiinde Konya Su ve Kanalizasyon İdaresi Genel Müdürlüđü tarafından yapılması planlanan "1.000 m<sup>3</sup>/gün kapasiteli (5.000 eşdeđer nüfus) Dođanhisar-Yenice-Çınaroba evsel atıksu arıtma tesisi" projesi, 25/11/2014 tarihli ve 29186 sayılı Resmî Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliđi Listelerindeki eşik deđerden az olduđu için kapsam dıřı olarak deđerlendirilmiřtir.

Ancak, planlanan yatırım ile ilgili olarak, 5491 sayılı kanunla deđişik 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diđer mer'î mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliřtirilmesine yönelik tedbirlere riayet edilmesi hususunda;

Geređini rica ederim.

KOSKİ Genel Müdürlüđü Genel Evrak Kaydı		
No	Tarih	EB
3389	09 Ağustos 2017	-

696 10 Ağustos 2017

Konul Do. Břk. İđr.

Atıf: Konut Şeh. Mri.  
10 Ağustos 2017

*Ch. E. Çelikkale*  
10.8.2017

Özgür SOMUNCU  
Vali a.  
İl Müdür Yardımcısı V.

04 Ağustos 2017

Not: 5970 sayılı Elektronik İmza Kanunu geređi bu belge elektronik imza ile imzalanmıřtır.  
Evrak Deđerlenme Kodu: BEK-EGİB7MVOEBOOMDE Evrak Takip Adresi: <https://www.turkiye.gov.tr/cevre-ve-sehirclik-bakanligi>  
Horozluhan Mah. Abdülbasri Sok. No:2 Selçuklu/KONYA  
Tel. (332) 235 45 20 Fax: (332) 235 45 27 konya@csb.gov.tr

Bilgi için Necati GİR  
Mühendis  
Telefon No:(332) 235 45 20





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## APPENDIX 2: Newspaper Announcements

### DOĐANHISAR, DEREBUCAK VE TAŐKENT ATIKSU ARITMA TESİSİ PROJELERİ HALKIN KATILIMI TOPLANTISINA DAVET

Konya Su ve Kanalizasyon İdaresi Genel Müdürlüğü ve İller Bankası A.Ő. tarafından Dünya Bankası finansmanı ile yürütülecek olan "Sürdürülebilir Şehirler Projesi-II Ek Finansman (SŐP-II-EF)" kapsamında Konya ili, Dođanhisar, Derebucak ve Taőkent İlçeleri sınırları içinde yapılması planlanan **Dođanhisar, Derebucak ve Taőkent Atıksu Arıtma Tesisi Projeleri** için yürütülen çevresel ve sosyal çalışmalar kapsamında halkı bilgilendirmek, halkın görüş ve önerilerini almak, inŐaat ve işletme dönemlerinde halk ile işbirliđi tesis etmek üzere İdare tarafından planlanan ve aŐađıda detayları verilen "**Halkın Katılımı Toplantısı**" düzenlenecektir.

Halkımıza saygı ile duyurulur.

#### Toplantı Tarihi, Saati ve Yeri

##### **Dođanhisar AAT:**

**Tarihi:** 21.09.2023 PerŐembe günü saat:10.00

**Adresi:** Dođanhisar Kültür Merkezi Pazar Mahallesi İhsan Zeki Doyduk Caddesi No:7 Dođanhisar/KONYA

##### **Derebucak AAT:**

**Tarihi:** 21.09.2023 PerŐembe günü saat:14.00

**Adresi:** Derebucak İlçe Parkı Sarayönü Mahallesi Av. Tahir AKYÜREK Caddesi No:71 Derebucak/KONYA

##### **Taőkent AAT:**

**Tarihi:** 22.09.2023 Cuma günü saat:14.00

**Adresi:** Taőkent Belediyesi Düđün Salonu Hıra Mahallesi Vali İzzet Bey Caddesi No:6 Taőkent/KONYA

**Proje Sahibi** : Konya Su ve Kanalizasyon İdaresi Genel Müdürlüğü

**Tel** : 0 332 221 61 00

**Faks** : 0 332 235 46 34



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### APPENDIX 3: Sample Grievance Register

No	Complaint Register Number	How Complaint is Received (Grievance Form, Community Meeting, Telephone)	Level of Grievance (Municipality/Utility Level, Regional ILBANK Office, ILBANK HQ Level)	Date of Complaint Received	Location of Complaint Received	Name of Person Receiving Grievance	Land Parcel # (If complaint is related to land)	Complainant Information					Project Component Related to Complaint	Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)	Complaint Summary	Grievance Status (open, closed or pending)	Action Taken				Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
								Name/Surname	ID Number	Telephone/e-mail	Village-District	Gender					Responsible Person/Department	Action Planned	Due Date of Addressing the Grievance	Date of Action Taken	
1																					



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#### APPENDIX 4: Sample Grievance Form

	KONYA METROPOLITAN MUNICIPALITY / GENERAL DIRECTORATE OF WATER AND SEWERAGE ADMINISTRATION			
	<b>Construction of Doganhisar WWTP</b>			
<b>GRIEVANCE FORM</b>				
Person Filling out the Form:			Date and time:	
Meeting Agenda:			Reference No:	
<b>INFORMATION ABOUT THE COMPLAINANT</b>				
Name Surname:			<b>Means of Complaint:</b>	
TR Identification number:			Phone / Toll Free Hotline <input type="checkbox"/>	
Phone:			Face to Face Meeting <input type="checkbox"/>	
Address:			Website / E-Mail <input type="checkbox"/>	
E-Mail:			Other (Explain) <input type="checkbox"/>	
<b>Stakeholder Type</b>				
Public Institution <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Labor Unions <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
<b>DETAILED INFORMATION ON THE COMPLAINT</b>				
Explanation of the complaint:				
Action requested by the complainant:			  	


Registrant Name Surname/  
Signature

Complainant Name Surname / Signature



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## APPENDIX 5: Sample Grievance Closeout Form


	<b>KONYA METROPOLITAN MUNICIPALITY / GENERAL DIRECTORATE OF WATER AND SEWERAGE ADMINISTRATION</b>
	<b>Construction of Doganhisar WWTP</b>
<b>GRIEVANCE CLOSEOUT FORM</b>	
Reference No:	
<b>IDENTIFICATION OF CORRECTIVE ACTION</b>	
1	
2	
3	
4	
5	
<b>Responsible Departments</b>	
<b>TERMINATION OF THE COMPLAINT</b>	
<i>This section will be filled and signed by the complainant in the event that the complaint specified in the "Grievance Register Form" is resolved.</i>	

**Grievance Closeout Date:** ...../...../.....  
**Name-Surname/Signature of the Person Closing Complaint:** .....  
**Name-Surname/Signature of Complainant:** .....



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## APPENDIX 6: Sample Consultation Form

	<b>KONYA METROPOLITAN MUNICIPALITY / GENERAL DIRECTORATE OF WATER AND SEWERAGE ADMINISTRATION</b>			
	<b>Construction of Doganhisar WWTP</b>			
<b>CONSULTATION FORM</b>				
Person Filling out the Form:	Date and time:			
Meeting Agenda:	Consultation Registration:			
<b>CONSULTATION INFORMATION</b>				
Interviewed Institution:	Communication Type			
Name-Surname of the Interviewee:	Phone / Hotline	<input type="checkbox"/>		
Phone:	Face to Face Meeting	<input type="checkbox"/>		
Address:	Website / E-mail	<input type="checkbox"/>		
E-Mail:	Other (Explain)	<input type="checkbox"/>		
<b>Stakeholder Type</b>				
Public Institution <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Labor Unions <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
<b>CONSULTATION DETAILS</b>				
Questions about the project:				
Project concerns/feedback:				
Responses to the views expressed above:				

Recorded by  
Name-Last Name/Signature

Complainant  
Name-Last Name/Signature



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## APPENDIX 7: Photos of Stakeholder Consultation Meeting






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## APPENDIX 8: Participation List of Stakeholder Consultation Meeting

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DOĞANHISAR ATIKSU ARITMA TESİSİ PROJESİ HALKIN KATILIMI TOPLANTISI KATILIMCI LİSTESİ					
TOPLANTI YERİ		DOĞANHISAR KÜLTÜR MERKEZİ		TARİH: 21.09.2023	
				SAAT: 10:00	
KATILIMCILAR					
Isim - Soyisim	Meslek	Temsil Ettiği Kurum / Yerleşim Yeri	Telefon Numarası	İmza	
1. A. K. A. A. A.	...	...	...	...	...
2. C. A. A. A.	...	...	...	...	...
3. D. A. A. A.	...	...	...	...	...
4. M. K. A. A.	...	...	...	...	...
5. E. A. A. A.	...	...	...	...	...
6. F. A. A. A.	...	...	...	...	...
7. G. A. A. A.	...	...	...	...	...
8. H. A. A. A.	...	...	...	...	...
9. I. A. A. A.	...	...	...	...	...
10.					





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DOĞANHİSAR ATIKSU ARITMA TESİSİ PROJESİ HALKIN KATILIMI TOPLANTISI KATILIMCI LİSTESİ

TOPLANTI YERİ

DOĞANHİSAR KÜLTÜR MERKEZİ

TARİH: 21.09.2023

SAAT: 10:00

KATILIMCILAR

İsim - Soyisim	Meslek	Temsil Ettiği Kurum / Yerleşim Yeri	Telefon Numarası	İmza
1. H. ...	M. ...	...	...	...
2. H. ...	M. ...	...	...	...
3. M. ...	E. ...	...	...	...
4. O. ...	A. ...	...	...	...
5. K. ...	F. ...	...	...	...
6. K. ...	M. ...	...	...	...
7. İ. ...	G. ...	...	...	...
8. R. ...	G. ...	...	...	...
9. E. ...	T. ...	...	...	...
10. P. ...	E. ...	...	...	...







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TARİH: 21.09.2023

SAAT: 10:00

KATILIMCILAR

Isim - Soyisim	Meslek	Temsil Ettiği Kurum / Yerleşim Yeri	Telefon Numarası	İmza
1. A. A. A.	...	...	...	...
2. S. S. S.	...	...	...	...
3. K. K. K.	...	...	...	...
4. C. C. C.	...	...	...	...
5. H. H. H.	...	...	09...	...
6. D. D. D.	...	Doğ... m... 90	5...	...
7. F. F. F.	...	...	056...	...
8. B. B. B.	...	...	E...	...
9. M. M. M.	...	...	05...	...
10. A. A. A.	...	...	054...	...





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DOĞANHISAR ATIKSU ARITMA TESİSİ PROJESİ HALKIN KATILIMI TOPLANTISI KATILIMCI LİSTESİ					
TOPLANTI YERİ		DOĞANHISAR KÜLTÜR MERKEZİ		TARİH: 21.09.2023 SAAT: 10:00	
KATILIMCILAR					
Isim - Soyisim	Meslek	Temsil Ettiği Kurum / Yerleşim Yeri	Telefon Numarası	İmza	
1. Güneş...	...	...	...	...	...
2. F. A. K. ...	...	...	...	...	...
3. P. L. ...	...	...	...	...	...
4. İ. ...	...	...	...	...	...
5. C. ...	...	...	...	...	...
6. M. ...	...	...	...	...	...
7. İ. ...	...	...	...	...	...
8. H. ...	...	...	...	...	...
9. A. ...	...	...	...	...	...
10. A. ...	...	...	...	...	...



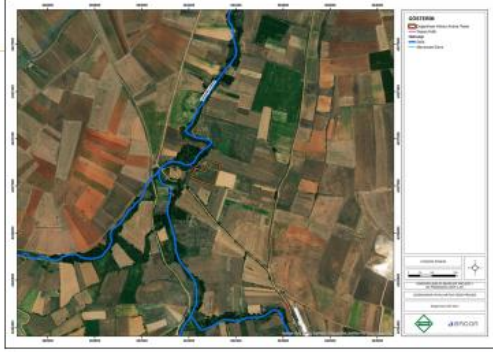
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## APPENDIX 9: Presentation Demonstrated during Stakeholder Consultation Meeting

<p style="text-align: center;"><b>SÜRDÜRÜLEBİLİR ŞEHİRLER PROJESİ - II</b></p> <p style="text-align: center;"><b>DOĞANHISAR ATIKSU ARITMA TESİSİ PROJESİ</b></p> <p style="text-align: center;"><b>HALKIN KATILIMI TOPLANTISI</b> <b>BİLGİLENDİRME SUNUMU</b> <b>EYLÜL 2023</b></p> <p style="text-align: center;"></p>	<p style="text-align: center;"><b>KAPSAM/GÜNDEM</b></p> <p style="text-align: center;"><b>DOĞANHISAR ATIKSU ARITMA TESİSİ PROJESİ</b></p> <p>Proje yürütücüsü kimdir? Proje uygulayıcısı kimdir? Proje finansörü kimdir?</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Proje'nin beklenen faydaları nelerdir?</li><li><input type="checkbox"/> Çevresel ve Sosyal Çalışmalar nedir?<ul style="list-style-type: none"><li>➢ Olası çevresel ve sosyal etkiler</li><li>➢ Etki azaltıcı önlemler ve yönetim stratejileri</li></ul></li><li><input type="checkbox"/> Paydaş Katılımı: Sürece nasıl dahil olabilirsiniz?</li><li><input type="checkbox"/> Sorular ve Cevaplar (Proje ile ilgili soru, beklenti, görüş ve öneriler)</li></ul> <p style="text-align: center;"></p>
<p style="text-align: center;"><b>PROJE YÜRÜTÜCÜSÜ KİMDİR? PROJE UYGULAYICISI KİMDİR? PROJE FİNANSÖRÜ KİMDİR?</b></p> <p style="text-align: center;"> <b>PROJE YÜRÜTÜCÜSÜ: İLLER BANKASI ANONİM ŞİRKETİ GENEL MÜDÜRLÜĞÜ</b></p> <p style="text-align: center;"> <b>PROJE UYGULAYICISI: KONYA BÜYÜKŞEHİR BELEDİYESİ SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜ (KOSKI)</b></p> <p style="text-align: center;"> <b>PROJE FİNANSÖRÜ: DÜNYA BANKASI</b></p> <p style="text-align: center;"></p>	<p style="text-align: center;"><b>PROJENİN YERİ</b></p> <p>❖ Proje alanı Konya ili Doğanhisar ilçesinde yer almaktadır. İlçe, Konya il merkezine 100 km uzaklıktadır.</p> <p>❖ Doğanhisar AAT için tahsis edilen arazi büyüklüğü yaklaşık 5.047 m<sup>2</sup>'dir.</p> <p>❖ Proje, Doğanhisar İlçesi Pazar Mahallesi 171/134 ve 171/136 parseller üzerinde inşa edilecektir.</p> <p style="text-align: right;"></p> <p style="text-align: center;"></p>



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### PROJENİN AMACI ve FAYDALARI

- ❖ Proje, KOSKI'nın Doğanhisar ilçesinde uygun bir atıksu arıtması sağlamasını ve böylece halk sağlığı, çevre ve doğal kaynaklara yönelik riskleri azaltmasını sağlayacaktır.
- ❖ Proje, bölgedeki koku şikayetlerini ortadan kaldıracaktır.
- ❖ Proje, Türkiye'nin atıksu sektöründe ulusal ve uluslararası kalite standartlarına uyum çabalarına katkı sağlayacaktır.
- ❖ Halkın sağlık standartları projenin uygulanmasıyla iyileştirilecektir.



### PROJE ÖZELLİKLERİ

- ❖ Doğanhisar Atıksu Arıtma Tesisi, ek bir son dezenfeksiyon ile gelişmiş biyolojik atıksu arıtma sistemi olarak tasarlanmıştır. Atıksu Arıtma Tesisi, 2055 hedef yılı ile günlük 1.000 m<sup>3</sup>/gün kapasiteye sahip olacak olup 10.000 nüfusa hizmet etmesi beklenmektedir.
- ❖ Arıtılan atıksu, yapılacak olan 22 m deşarj hattı ile Çeşmeli Çayı'na deşarj edilecektir.
- ❖ Projenin personel ihtiyaçları henüz kesinleşmemiş olmakla beraber işe alım sürecinde yerel halka öncelik verilecektir.
- ❖ Projenin inşaat faaliyetlerinin 12 ay süreceği öngörülmektedir.



### PROJE ÖZELLİKLERİ

Proje ile ilgili tüm kamulaştırma işlemleri tamamlanmıştır.  
2010-2017 yılları arasında belediye tarafından kamulaştırılan araziler şu anda herhangi bir şahıs (kaçak kullanıcı) tarafından kullanılmamaktadır ve tamamı boştur.





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## DOĞANHİSAR AAT GÖRÜNÜMÜ



\* Görsel süreç ve kapıların otomatik olarak kapanması için testler yapılır.



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## ÇEVRESEL VE SOSYAL ÇALIŞMALARIN KAPSAMI

FİZİKSEL ve  
BİYOLOJİK ÇEVRE

SOSYO-  
EKONOMİK ÇEVRE

KÜLTÜREL MİRAS

Etki Kaynağı Faaliyetleri/Durumlar

- Tesviye, Kazı ve Dolgu
- Malzeme Temini ve Taşınması
- Atık Oluşumu
- İstihdam
- İşletme sırasında oluşabilecek teknik hatalar

İlgili Çevresel ve Sosyal Unsurlar

- Toprak Ortamı
- Su Kaynakları
- Biyolojik Ortam
- Hava Kalitesi
- Gürültü
- Koku
- Trafik
- Atık Yönetimi
- Kültürel Miras
- Sosyo-ekonomik Çevre
- Toplum Sağlığı ve Güvenliği
- İş ve Çalışma Koşulları



## TOPRAK ORTAMI

### Olası Etkiler

- Üst toprak kaybı
- İnşaat makine ve ekipmanlarında kullanılacak yakıt, boya ve yağların sızması ve dokülmesi nedeniyle toprak kirlenmesi riski
- Proje kapsamında oluşacak katı veya sıvı atıkların kontrolsüz depolanması veya bertaraf edilmesi durumunda oluşabilecek toprak kirliliği
- Erozyon potansiyeli

### Alınacak Önlemler

- ✓ Sadece belirlenen çalışma sahaları ve güzergahları kullanarak kirlenmeye maruz kalacak toprak miktarını minimuma indirecektir.
- ✓ Şantiyede kullanılacak iş makineleri ve araçlar için gerekli olan yakıt, öncelikle en yakın istasyondan sağlanacak, gerekli görülmesi halinde sahada depolanabilecek yakıtlar, gerekli sızdırmazlık önlemlerinin alındığı alanlarda depolanacaktır.
- ✓ Erozyona sebep olmamak için bitkisel toprağın sınırlanması olmasını gerektiren erken yapılmayacaktır ve sınırlanmış toprak uygun koşullarda (çevre düzenlemesi vs) yeniden kullanılmak üzere depolanacaktır.



## SU KAYNAKLARI

### Olası Etkiler

- İnşaat aşamasında, çalışanların günlük ihtiyaçları su temini gereksinimini yaratacaktır.
- Projenin inşaat aşamasında toz bastırma için su kullanılacaktır.

### Alınacak Önlemler

- ✓ AAT'nin çıkış suyu kalitesi Kentel Atıksu Arıtma Yönetmeliği'nde belirtilen sınır değerlerde uyumlu olacak ve deşarj edilen su Çeşmeli Çayı'nın kirlenmesine neden olmayacaktır.
- ✓ Boruların ve pompaların bakım ve onarım işleri geciktirmeden yapılacaktır.
- ✓ Toz bastırma faaliyetleri için sulamaya bağlı yüzey akışı önlenmektedir.
- ✓ İnşaat çalışmalarında oluşacak atıksu, su kaynaklarına deşarj edilmeyecektir.





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## KARASAL BİYOÇEŞİTLİLİK

### Olası Etkiler

- Flora- fauna türleri üzerindeki olası riskler

### Alınacak Önlemler

- Proje alanı içerisinde korunan ve hassas ekosistemler veya türlerin olması öngörülmektedir.
- Çalışma alanı sınırları içerisinde gerekli görülmedikçe bitki örtüsü temizliği yapılmayacaktır. Bitki örtüsü temizliği yapılan yerlerde mümkün olduğunca tekrar bitkilendirme yapılacaktır.
- Arazi hazırlığı aşamasından önce, inşaat faaliyetlerinin yapılacağı bölge önceden belirlenecek ve bu sınırların dışına çıkılmayacaktır.



## HAVA KALİTESİ VE GÜRÜLTÜ

### Olası Etkiler

- Projenin inşaat aşamasında hava kalitesi üzerindeki başlıca etkiler, malzeme taşıma, araç hareketi ve ağır iş makinelerinden (kamyonlar, ekskavatörler, vb.) kaynaklanan emisyonlardan kaynaklı olacaktır. Hava kirliliği esas olarak toz emisyonları ve egzoz emisyonları ile sera gazı emisyonları kaynaklı olacaktır.
- Sahanın hazırlanması ve inşaat faaliyetleri için kullanılacak ulaşım araçları, makineleri ve diğer ekipmanları tarafından gürültü oluşması beklenmektedir.

### Alınacak Önlemler

- İnşaat sahaları toz oluşumuna karşı düzenli olarak sulanacaktır.
- İnşaat gürültü bariyerleri kullanılarak gürültü azaltımı sağlanacaktır.
- İnşaat araçlarının partiyeye girmeyi beklerken veya partiyede beklerken motorlarını çalığe durumda tutmalarına izin verilmeyecektir.
- AAT sınırları altına ağaç dikilecektir.
- Proje kapsamında gürültü seviyesi düşük ekipman seçimine özen gösterilecektir.
- İnşaat faaliyetleri mümkün olduğunca gündüz saatlerinde yapılacaktır.



## KOKU

### Olası Etkiler

- Atıksu arıtma tesisinin çamur üniteleri kaynaklı düşük miktarda koku oluşumu görülebilir.

### Alınacak Önlemler

- İzgaralara takılan atıkların bertaraf sıklığı artırılabilecektir.
- Biyolojik arıtım sırasında havalandırma oranı artırılacaktır.
- Arıtma tesisi kapasitesini aşan atıksu akışı önlenmektedir.
- Koku ile ilgili şikayetleri yönetmek için işleyen bir şikayet gideme mekanizması kurulacaktır.



## TRAFİK

### Olası Etkiler

- Şehir içinde ve tesis çevresinde gerçekleştirilecek inşaat faaliyetleri dolayısıyla trafiğin artması ve aksaması

### Alınacak Önlemler

- Trafik Yönetim Planı hazırlanacak ve trafiği etkileyebilecek tüm faaliyetler bu plana göre yapılacaktır.
- Trafik, trafik güvenliği ve trafik akışındaki aksamaları minimuma indirecek şekilde düzenlenecektir.
- Yolların kapatılması gerekiyorsa resmi izinler alınacak ve aksaklığın güzergahı ve süresi önceden belirlenecektir.
- Alternatif güzergahlar belirlenecek ve ulaşım trafiğin yoğunluğuna göre programlanacaktır.
- Gerekli trafik levhaları ve bariyerler yüklenici tarafından konulacaktır.
- Şikayet mekanizması kurulacak ve işletilecektir.





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## ATIK OLUŞUMU

### Atık Üretecek Olası Kaynaklar

- İnşaatla çıkacak personel kaynaklı katı atık oluşumu
- Ahşap, kağıt, karton, plastik vb. ambalaj atıkları
- Proje'nin inşaat ve işletme aşamaları kapsamında oluşabilecek tehlikeli ve özel atıklar, kontamine kaplar, bez ve giysiler, atık pil ve akümülatörler, atık yağlar vb.
- Hafiyat ve inşaat atıkları



### Alınacak Önlemler

- ✓ Proje kapsamında oluşacak atıklar atık yönetimi hiyerarşisine göre yönetilecektir.
- ✓ Atıklar çok bekletilmeden bertaraf edilecektir.
- ✓ Geri dönüştürülmeyen ve değerlendirilmeyen katı atıklar çamurlu sahadaki çöp konteynerlerinde toplanacak ve belediye tarafından uzaklaştırılacaktır. Atıkların sahadaki yakılması veya gömülmesi söz konusu olmayacaktır.
- ✓ Atık oluşumu, depolanması ve bertarafı ile ilgili kayıtlar tutulacaktır. Geçmiş depolanan atıklar özetliklerine göre sıvılandırılacaktır.



## SOSYO-EKONOMİ

### Olası Etkiler:

- Proje'nin inşaat ve işletme aşamalarında toz, gürültü, ulaşımın aksaması gibi hususlar söz konusu olabilir.
- Proje kapsamında çalıştırılacak iş gücünün, çalışma şartları, haklarının korunması, iş sağlığı ve güvenliği gibi konular üzerindeki olası etkileri olabilir.

### Alınacak Önlemler

- ✓ Çalışanların ulusal iş hukuku kapsamındaki haklarıyla ilgili açık ve anlaşılır bir şekilde bilgilendirilmesi
- ✓ İş Sağlığı ve Güvenliği kapsamında inşaat aşamasında çalışanlara ve operasyon ve bakım personeline eğitimler verilmesi
- ✓ Çalışanların ve üçüncü kişilerin, proje ile ilgili alanlara girişinin kontrolü bir şekilde sağlanması. Proje alanının güvenliğini sağlamak için gerekli izlere sahip kişilerin veya kuruluş görevlilerinin alana erişime izin verilmesi
- ✓ Tüm ekipmanın uygun çalışma düzeninde çalıştırılması
- ✓ Şikayet mekanizmasının kurulması ve işletilmesi



## ARKEOLOJİ VE KÜLTÜREL MİRAS

### Olası Etkiler

- İnşaat aşamasında bilinmeyen arkeolojik yerleri ve kalıntıları keşfetme ve bunlara olası zarar vermek
- İnşaat aşamasında bulunan arkeolojik yerlerin ve kalıntıların değeri olduğunu fark edmeden önemli kültürel değerleri kaybetmek

### Alınacak Önlemler

- ✓ Kültürel mirasın korunmasının önemi ve Proje'nin kültürel miras kaynaklarına olan etkilerini önleme, en aza indirme veya hafifletme taahhüleri konusunda farkındalıklarını artırmak için tüm Proje personeli ve Taseronlara eğitim verilecektir. Eğitim KOSKİ/PIU Ç&S Uzmanı tarafından yürütülecektir.
- ✓ Yüklenici ve Taseronlarla yapılan sözleşmelerde inşaat süresince inşaat kaynaklı zararların karşılanmasına yönelik hükümler yer alacaktır.
- ✓ Yüklenicinin Proje alanında yapacağı işler sırasında herhangi bir taşınır veya taşınmaz kültür varlığı ile karşılaşması durumunda, Yüklenici tüm işleri durdurmalı, 2963 sayılı Kanun'un 4. maddesi uyarınca KOSKİ tarafından en yakın Mahalli İdare veya Müze Müdürlüğü'ne haber vermeli ve bundan sonra ilgili makamdan gelecek talimatlara uymalıdır.



## PAYDAŞ KATILIMI: SÜRECE NASIL DAHİL OLABİLİRSİNİZ?

### Görüş ve Şikayet Bildirimi Mekanizması

Proje kapsamında bir Şikayet Mekanizması kurulacak ve herkes tarafından erişilebilir olacaktır.

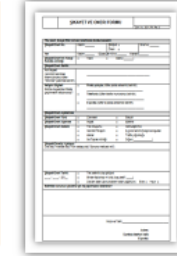
Proje ile ilgili beklentilerinizi, görüşlerinizi, önerilerinizi ve şikayetlerinizi;

- Paydaş Katılım Toplantıları sırasında,
- KOSKİ internet sitesini kullanarak,
- Şikayet Mekanizmasını kullanarak,
- A10 153 ve A10 185 Acil Yardım Hattı aracılığıyla,
- Cumhurbaşkanlığı İletişim Merkezi (CİMER) aracılığıyla,
- KOSKİ proje temsilcisi aracılığıyla iletişime geçebilirsiniz.

Telefon: 0 332 221 61 00

Adres: İhsaniye Mh. Kazım Karabekir Cd. No: 56/42060 Selçuklu/Konya

E-mail: koski@hs11.kcp.tr, koski@hs03.kcp.tr



- Bu toplantıda sunacağımız görüş, öneri ve şikayetlerinizi kayıt altına alınarak nihai raporda ilgili paydaşların (KOSKİ, İLBANK, DB) bilgisine sunulacaktır.





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## SÜRDÜRÜLEBİLİR ŞEHİRLER PROJESİ - II

### DOĞANHISAR ATIKSU ARITMA TESİSİ PROJESİ

**KATILIMINIZ VE İLGİNİZ İÇİN TEŞEKKÜR EDERİZ!**

**SORULAR, YORUMLAR VE GÖRÜŞLER ?**







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## APPENDIX 10: Brochure of Project Distributed during Stakeholder Consultation Meeting

**Doğanhisar Atıksu Arıtma Tesisi Projesi.** Türkiye'deki şehirlerde sürdürülebilir kalkınmayı desteklemek için Sürdürülebilir Şehirler Projesi- II Ek Finansman (SŞP-II-EF) kapsamındaki alt projelerden biridir. SŞP-II-EF, özellikle afetlere ve iklim değişikliğinin hafifletilmesine ve risklere karşı şehir direncine ilişkin proje yaklaşımlarını geliştirmeyi amaçlamaktadır.

Dünya Bankası (DB) tarafından finanse edilen proje, İller Bankası A.Ş. aracılığı ile KOSKİ tarafından yürütülecektir.

**Projenin genel amacı,** atıksu hizmetleri ihtiyacına daha iyi cevap verebilmek için KOSKİ'ye destek olmaktadır.

**Proje,** Doğanhisar İlçe merkezi, Yenice Mahallesi ve Çınaroba Mahallesi'ne hizmet verecektir.

**Doğanhisar Atıksu Arıtma Tesisi** gelişmiş biyolojik atıksu arıtma sistemi olarak tasarlanmıştır. Mevcut durumda, Çeşimli Çayı'na arıtılmamış atıksu deşarjı, çevre ve halk sağlığı üzerinde önemli bir baskı oluşturmaktadır.

Bu kapsamda Proje, 2055 hedef yılı ile 1.000 m<sup>3</sup>/gün kapasiteli bir Atıksu Arıtma Tesisi (AAT) inşa ederek bu baskıyı ortadan kaldırmayı hedeflemektedir ve 4.400 m<sup>2</sup> alanda hizmet verilmesi öngörülen nüfus yaklaşık 10.000 kişidir. Proje Doğanhisar İlçesi Pazar Mahallesi 171/134 ve 171/136 parseller üzerinde inşa edilecektir (Bkz: Şekil 1).

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**Projenin beklenen sonuçları aşağıdaki gibidir:**

- Proje, KOSKİ'nin Doğanhisar ilçesinde uygun bir atıksu arıtması sağlamanı ve böylece halk sağlığı, çevre ve doğal kaynaklara yönelik riskleri azaltmasını sağlayacaktır,
- Proje, bölgedeki koku şikayetlerini ortadan kaldıracaktır;
- Proje, Türkiye'nin atıksu sektöründe ulusal ve uluslararası kalite standartlarına uyum çabalarına katkı sağlayacaktır;
- Halkın sağlık standartları projenin uygulanmasıyla iyileştirilecektir.

**Projenin inşaatı on beş (15) ayda tamamlanması planlanmaktadır.**

İnşaat ve işletme aşamalarında istihdam edilecek toplam işçi sayısı kesin olmamakla birlikte, inşaat ve işletme aşamalarında sırasıyla 100 ve 10 olarak tahmin öngörülmektedir.

**Projenin işe alım sürecinde yerel halka öncelik verilecektir.**

Proje, ulusal mevzuatın yanı sıra DB Koruma Politikaları, yönergeler, standartlar ve en iyi uygulama belgeleri de dahil olmak üzere iyi uluslararası uygulamalarla uyumlu olacaktır.

Proje herhangi bir ekonomik yer değiştirmeye neden olmayacaktır. AAT'nin inşası sırasında sadece yerel işletmeler üzerinde önemli olmayan geçici etki olacaktır. Yolların kapanmasından mümkün olduğunca

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kaçınılacak, inşaat faaliyetleri nedeniyle proje çevresindeki işletmelerin kapanması beklenmemektedir.



Şekil 1: Doğanhisar AAT Yer Buldurma Haritası

**Beklenen etkilerin yönetimi için bir Çevresel ve Sosyal Yönetim Planı (ÇSYP) geliştirilmiştir.**

ÇSYP, Projenin geliştirilmesinden kaynaklanan olası çevresel ve sosyal etki ve riskleri belirlemek ve önemli olumsuz çevresel etkiler için etki azaltma önlemleri önermek amacıyla hazırlanmaktadır.

Ayrıca ÇSYP kapsamında uygulanacak **izleme ve denetim faaliyetleri** de tanımlanacaktır. ÇSYP çalışmaları kapsamında toprak ve hava ortamları, gürültü, koku, su kaynakları, atıklar, trafik üzerinde oluşabilecek etkiler değerlendirilecek ve ilgili etki azaltma önlemleri belirtilecektir.

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İzleme gereklilikleri de ÇSYP kapsamındaki izleme tablolarında tanımlanarak sunulacaktır. Buna göre projenin inşaat aşamasında, üst toprak kaybı, toprak kirliliği, toz emisyonları, gürültü, sızıntı, su kirliliği, atık üretimi ve iş sağlığı ve güvenliği, işletme aşamasında ise kimyasalların depolanması ve kullanımı, atıklar, gürültü, geçim kaynakları, şikâyetler, topluluk çatışmaları, paydaş katılımı, iş sağlığı ve güvenliği ve işgücü parametreleri **ÇSYP'de belirlenen şartlara uygun olarak izlenecektir.**

Bu Çevresel ve Sosyal Yönetim Planı (ÇSYP)'nin uygulanmasından sorumlu ana kurum, projenin inşaatından ve işletme aşamalarından da sorumlu olan Konya Su ve Kanalizasyon İdaresi (KOSKİ)'dir. Ayrıca, projenin farklı aşamalarında çeşitli taraflar (Yükleniciler, Müşavir firma, Proje Uygulama Birimi, İLBANK, vb.) ÇSYP kapsamında çeşitli konularda sorumluluk alacaklardır. Sözü edilen tüm çalışmalar KOSKİ tarafından koordine edilecektir.

Proje dokümanları ayrıca KOSKİ'nin internet sitesi üzerinden yayınlanacaktır ve talep edilmesi halinde bu dokümanlar KOSKİ tarafından paylaşılacaktır.

Konya halkının hem inşaat hem de işletme aşamasında Proje ile ilgili endişelerini, görüşlerini, şikâyetlerini ve önerilerini almak adına bir **Şikâyet Giderme Mekanizması** kurulmuştur.

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Bu mekanizma aracılığıyla iletilen şikâyetler, hızlı ve hassas bir şekilde ele alınacaktır.

Şikâyet Giderme Mekanizması'nın kurulmasından ve uygulanmasından sorumlu kurum Konya Su ve Kanalizasyon İdaresi (KOSKİ) olacaktır. Bu kapsamda proje ile ilgili beklenti, görüş, öneri ve şikâyetlerin paylaşılması için aşağıda verilen iletişim kanalları da ayrıca kullanılabilir:

**Paydaş Katılım Toplantıları**

**KOSKİ:**

**Telefon: 0 332 221 61 00**

**E-mail: koski@hs03.kep.tr**  
**koski@hs01.kep.tr**

Tüm iç ve dış paydaşlar, projeye ilgili şikâyetlerini ve geri bildirimlerini doğrudan devlet yetkililerine iletmek için alternatif ve iyi bilinen bir kanal olarak tüm proje paydaşlarının erişimine açık olan ve ülke çapında kullanılan Cumhurbaşkanlığı İletişim Merkezi (CİMER) gibi diğer şikâyet giderme mekanizmalarından da yararlanma hakkına sahip olacaktır.

- [www.cimer.gov.tr](http://www.cimer.gov.tr)
- Çağrı merkezi: 150**
- Telefon numarası: +90 312 525 55 55**

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**SÜRDÜRÜLEBİLİR ŞEHİRLER PROJESİ-II**

**Doğanhisar Atıksu Arıtma Tesisi Projesi**

**Bilgilendirme Broşürü**

**EYLÜL 2023**



**BANK**  
E'NİN YAPICI GÜCÜ

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