

GREEN AND FUTURE CITIES (GFC) PROJECT

KONYA WATER AND SEWERAGE ADMINISTRATION

KIRELİ WASTEWATER TREATMENT PLANT CONSTRUCTION PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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List of Abbreviations

Aol	Area of Influence
CIMER	Presidency's Communication Center
E&S	Environmental and Social
E&S Consultant	POSEİDON Environmental Social Consulting Engineering Trade Ltd. Co
EHS	Environment Health and Safety (EHS)
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Reports
ESMS	Environmental and Social Management System
GBV	Gender-Based Violence
GM	Grievance Mechanism
GMCP	Grievance Mechanism Contact Person
İLBANK	İLBANK A.Ş.
KOSKİ	Konya Water and Sewerage Administration
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organization
OG	Official Gazette
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAP	Project Affected People
PID	Project Identification Document
PIU	Project Implementation Unit
PIU	Project Implementation Unit
POSEİDON	POSEİDON Environmental Social Consulting Engineering Trade Ltd. Co
PUMREP	Türkiye Public and Municipal Renewable Energy Project
SCM	Stakeholder Consultation Meeting
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
Subproject	Kireli Wastewater Treatment Plant Construction project
The Bank	World Bank
The Project	Green And Future Cities (GFC) Project
TurkStat	Turkish Statistical Institute
WB	World Bank



WBG	World Bank Group
WHO	World Health Organization
YIMER	Foreigners Communication Center



Definitions

Direct Stakeholders: All individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Indirect Stakeholders: Groups or individuals within a business who work directly within the business, such as employees and contractors.

Other Interested Parties: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, Non-Governmental Organizations (NGOs) and the government.

Vulnerable/Disadvantaged Individuals/Groups: People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage and who may be limited in their ability to access project information or voice their concerns.

Grievance: An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner.

Grievance Mechanism: A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community grievances concerning the performance or behavior of the company, its contractors, or workers.

Project Affected Persons (PAPs): Individuals, groups, or communities who are directly affected (actually or potentially) by the Project's environmental and social impacts. PAPs may include persons residing, working, or carrying out livelihood activities within the Project's Area of Influence, as well as those who may experience impacts related to construction activities (e.g., noise, dust, traffic), access restrictions, or changes in environmental conditions. PAPs also include users of infrastructure (such as roads) that may be affected during the Project lifecycle.

Project Implementation Unit (PIU): The unit which is responsible from the environmental, social, and H&S implementations of the Project during pre-construction, land preparation and construction and operation phases. The PIU Team includes at least six personnel which are: the Head of the PIU (or Project Manager), two financial experts, Environmental Expert, Social Expert and Occupational Health and Safety (OHS) Expert.

GM Team: The team which proceeds the grievances, requests and comments coming from the internal and external stakeholders and implements the Grievance Mechanism procedures in accordance with the ESMP and SEP which are prepared in line with the national legislation, MoIT GM Policy, İLBANK GM Policy and WB ESF.

Executive Summary

The Kireli Wastewater Treatment Plant Construction Project is implemented by the Konya Water and Sewerage Administration (KOSKİ) within the scope of the Green and Future Cities Project (GFC), financed by the World Bank with İller Bankası A.Ş. (İLBANK) acting as the Financial Intermediary. The Subproject is located in Kireli Neighbourhood of Hüyük District, Konya Province, and aims to protect the water quality of Lake Beyşehir by collecting and treating domestic wastewater generated in Kireli, Çavuş, Tolca, and Göçeri neighbourhoods and reducing public health and environmental risks.

The Subproject involves the construction and operation of an advanced biological wastewater treatment plant with nutrient removal. The WWTP is designed with a daily treatment capacity of 800 m³/day for the target year 2048 and will serve a projected population of 7,585 persons. Considering that Lake Beyşehir is designated as a sensitive receiving environment, the treatment process has been designed to reduce organic pollution as well as nitrogen and phosphorus loads. Treated effluent will be discharged to a dry creek bed through an approximately 250 m-long discharge line, with Lake Beyşehir being the final receiving environment.

The Subproject will be constructed within Block 216, Parcel 32, located in Kireli Neighbourhood. The parcel covers a total surface area of 5,145.39 m² and is owned by KOSKİ. The parcel was purchased from Hüyük Municipality in 2017, and the ownership transfer was completed in the same year. Following the land registry category/type change, the parcel has been officially registered as “Wastewater Treatment Plant Area”. Therefore, no new Agricultural Marginal Land Certificate is required for the project parcel, although an Agricultural Marginal Land Certificate had previously existed. The updated title deed document will be included in the annexes of the report.

An existing reinforced concrete structure belonging to a previously initiated but incomplete wastewater treatment plant is present on the project site. This structure will be demolished within the scope of the Subproject, and the new WWTP units and auxiliary facilities will be constructed on the same parcel. The entire WWTP footprint will remain within the boundaries of the KOSKİ-owned parcel.

The wastewater collector lines to be constructed under the Subproject will convey domestic wastewater generated in Kireli, Çavuş, Tolca, and Göçeri neighbourhoods to the Kireli WWTP. In addition, İlmen Neighborhood is currently connected to the Çavuş Neighborhood sewer network; therefore, no new wastewater collector line will be constructed for İlmen Neighborhood under the Sub-project. The existing connection will be maintained, and wastewater generated in İlmen Neighborhood will continue to be conveyed to the Kireli Wastewater Treatment Plant through the existing infrastructure for treatment under the Sub-project. Accordingly, İlmen Neighborhood is included among the settlements served by the Sub-project without requiring any new wastewater collection infrastructure.

No new energy transmission line will be constructed under the Subproject. In line with the opinion of MEDAŞ, only the relocation of an existing transformer pole is foreseen. This activity will be carried out within the boundaries of the existing KOSKİ-owned parcel and will not require any additional land acquisition or use of privately owned land. Existing energy transmission infrastructure will continue to be used for the electricity supply of the facility.

A land acquisition assessment has been conducted in accordance with ESS5 through site observations, review of relevant land registry records, and assessment of the planned infrastructure routes. Based on the available land ownership information and field verification, the WWTP site is located entirely within the KOSKİ-owned parcel, while the collector lines and discharge line will be located within existing public road corridors. Therefore, no permanent or temporary private land acquisition, physical displacement, economic displacement, or restriction on land use is anticipated under the Subproject. Should any unforeseen land-related impact or temporary access restriction arise during implementation, such impacts will be managed in accordance with the ESMP, the Project Grievance Mechanism, applicable national legislation, and the requirements of World Bank ESS5.



The Area of Influence (Aol) of the Subproject includes the WWTP site located in Kireli Neighbourhood, the wastewater collector line routes extending through Kireli, Çavuş, Tolca, and Göçeri neighbourhoods, the discharge line, access roads to be used during construction, and surrounding receptors that may be affected by construction and operation activities. Although Çavuş, Tolca, and Göçeri neighbourhoods are not located in the immediate vicinity of the WWTP site, they are included within the Subproject's Aol due to the presence of wastewater collector line routes and their status as beneficiary settlements. No new wastewater collector line will be constructed in İlmen Neighborhood under the Sub-project, as the neighborhood is currently connected to the Çavuş Neighborhood sewer network. Therefore, although no new physical works are planned within İlmen Neighborhood, it has been included within the Subproject's Area of Influence (Aol) as a beneficiary settlement, as it will continue to receive wastewater treatment services from the Kireli Wastewater Treatment Plant through the existing infrastructure.

Sensitive and community receptors identified within the Subproject Aol include Kireli Şehit Kadir Kayhan Primary and Secondary School, Kireli High School, Kireli Family Health Center, Yeni Mosque and Yunus Emre Mosque, Çavuş Village Cemetery, the prayer room in Göçeri Neighbourhood, privately owned agricultural lands, the seafood processing facility operating in Kireli Neighbourhood, and Callut Agriculture, Tourism and Aquaculture in Tolca Neighbourhood. These receptors have been considered in the stakeholder identification and engagement planning process.

Stakeholders were identified through a combination of desk-based review and field-based data collection methods. Secondary data were obtained from official sources, including TurkStat demographic data, cadastral records, project design documents, and local administrative information. Primary data were collected through site observations and stakeholder consultations with local representatives, community members, and relevant institutions.

The main project-affected and beneficiary stakeholders include residents of Kireli, Çavuş, Tolca, and Göçeri neighbourhoods; mukhtars of the beneficiary settlements; vulnerable and disadvantaged groups; agricultural land users; households engaged in agriculture and/or animal husbandry; road users along construction routes; KOSKİ employees; contractors, subcontractors, suppliers, and service providers; and sensitive/community receptors located within the Aol. Other interested parties include relevant public institutions, local administrations, electricity distribution authorities, NGOs, media representatives, academia, ILBANK, and the World Bank.

Vulnerable and disadvantaged groups identified within the Subproject Aol include poor households, female-headed households, elderly individuals aged 65 and above, persons with disabilities, and unemployed individuals. According to the information obtained through local consultations, there are 118 poor households, 200 female-headed households, 370 elderly individuals aged 65 and above, 21 persons with disabilities, and 55 unemployed individuals across Kireli, Çavuş, Göçeri, İlmen and Tolca neighbourhoods. Engagement activities will therefore be planned in an accessible and inclusive manner, with the involvement of mukhtars and the use of clear, understandable, and locally appropriate communication methods.

This Stakeholder Engagement Plan has been prepared to ensure transparent communication with stakeholders, minimize potential adverse social impacts, and enhance the positive effects of the Kireli Wastewater Treatment Plant Subproject. The SEP outlines the methods for stakeholder consultation, information disclosure, grievance management, feedback collection, and integration of stakeholder views into project implementation. It also presents stakeholder analysis, engagement tools, planned engagement activities, institutional responsibilities, monitoring arrangements, and reporting mechanisms.

The SEP has been developed in line with the requirements of ESS10 of the World Bank's Environmental and Social Framework, the Environmental and Social Management System (ESMS) of ILBANK, relevant Turkish legislation, and the project-specific ESMP. The SEP will be continuously updated throughout the Subproject lifecycle to reflect stakeholder feedback, project developments, and any changes in environmental and social risks or implementation arrangements. It has been prepared in coordination



with the ESMP to ensure consistency and complementarity between stakeholder engagement measures and environmental and social risk management actions.



1 Introduction/ Project Description

The Green and Future Cities Project (GFC), supported by the World Bank and implemented in Türkiye through ILBANK, is a strategic initiative aimed at fostering climate-resilient and sustainable urban development. As urbanization accelerates, cities face increasing challenges related to greenhouse gas emissions, environmental degradation, and vulnerability to climate-related risks. GFC seeks to address these challenges by providing municipalities with the financial, technical, and institutional support needed to implement green infrastructure and low-carbon solutions. Konya, one of Türkiye's largest and fastest-growing cities, has been selected under GFC due to its rapid urbanization, high energy consumption, and significant exposure to climate-related challenges, including water scarcity and heat stress. By targeting Konya, the project aims to demonstrate how comprehensive climate-resilient urban planning and sustainable infrastructure investments can be effectively implemented in a major urban center.

GFC will be financed by the World Bank (WB) to support participating municipalities and utilities in Türkiye to plan for and invest in climate resilience and greenhouse gas (GHG) reductions. İller Bankası A.Ş. (ILBANK) will act as the Financial Intermediary (FI).

Within this scope, the "Kireli Wastewater Treatment Plant (WWTP) Subproject" (hereinafter referred to as the Subproject) will be implemented by Konya Water and Sewerage Administration (KOSKİ). The purpose of the Subproject is to collect and treat domestic wastewater generated in Kireli, Tolca, Çavuş, İlmen and Göçeri neighbourhoods of Hüyük District in Konya Province, and to safely discharge the treated effluent into the receiving environment.

1.1 Objectives

The primary objective of the Subproject is to collect and treat domestic wastewater generated in Kireli, Tolca, Çavuş, İlmen and Göçeri neighbourhoods of Hüyük District, Konya Province, and to safely discharge the treated effluent into the receiving environment in compliance with national legislation and applicable international standards.

Based on population projections prepared for the target year 2048, the service population is estimated at 7,585 persons. The design capacity of the Kireli Wastewater Treatment Plant is 800 m³/day. Considering that Lake Beyşehir is designated as a sensitive receiving environment, the Subproject has been designed as an advanced biological wastewater treatment plant with nutrient removal, particularly for the reduction of nitrogen and phosphorus loads.

The Subproject aims to:

- Prevent uncontrolled discharge of untreated domestic wastewater,
- Reduce pollutant and nutrient loads reaching the Lake Beyşehir basin,
- Protect groundwater and surface water resources,
- Minimize eutrophication risks in the receiving environment,
- Improve public health and environmental sanitation conditions in the beneficiary neighbourhoods,

Contribute to long-term environmental sustainability and water quality protection in Hüyük District and the Lake Beyşehir basin.

The treated effluent will be discharged to a dry creek bed through an approximately 250 m-long discharge line, with Lake Beyşehir being the final receiving environment.

The Subproject is subject to the Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette No. 31907, dated 29 July 2022). The EIA applicability/status of the Kireli Wastewater Treatment Plant Subproject will be confirmed based on the official opinion/decision of the Konya Provincial Directorate of Environment, Urbanization and Climate Change and will be reflected in the relevant section and annexes of the report.

1.2 Components

The Subproject consists of the following components:

Wastewater Treatment Plant (WWTP)

The Subproject includes the construction of a wastewater treatment facility with a design capacity of 800 m³/day to serve Kireli, Tolca, İlmen, Çavuş, and Göçeri neighbourhoods of Hüyük District, Konya Province. The facility has been designed to serve a projected population of 7,585 persons for the target year 2048.

Considering that Lake Beyşehir is designated as a sensitive receiving environment, the treatment process will be based on advanced biological treatment with nutrient removal. The system will be designed to reduce organic pollution as well as nitrogen and phosphorus loads before discharge to the receiving environment.

The WWTP will be constructed within Block 216, Parcel 32, located in Kireli Neighbourhood. The parcel covers a total area of 5,145.39 m² and is owned by KOSKİ. Following the land registry category/type change, the parcel has been registered as “Wastewater Treatment Plant Area”. Therefore, no new Agricultural Marginal Land Certificate is required for the project parcel. The updated title deed document will be included in the annexes of the report.

There is an existing reinforced concrete structure on the site, which belongs to a previously initiated but incomplete wastewater treatment plant. This structure will be demolished within the scope of the Subproject, and the new WWTP units and auxiliary facilities will be constructed on the same parcel.

Wastewater Collector Lines

The Subproject also includes wastewater collector lines that will collect domestic wastewater generated in Kireli, Tolca, Çavuş, and Göçeri neighbourhoods and convey it to the Kireli WWTP. İlmen Neighborhood is currently connected to the Çavuş Neighborhood sewer network; therefore, no new wastewater collector line will be constructed for the neighborhood under the Sub-project. Domestic wastewater generated in İlmen Neighborhood will continue to be conveyed to the Kireli Wastewater Treatment Plant (WWTP) through the existing sewer infrastructure and treated at the facility.

The secondary Area of Influence (Aoi) associated with the wastewater collector line routes covers Kireli, Tolca, Çavuş, and Göçeri neighborhoods, where new collector lines will be constructed. As no new collector line will be installed in İlmen Neighborhood, it has not been included within the secondary Aoi. However, since the neighborhood will continue to receive wastewater treatment services from the Kireli WWTP through the existing infrastructure, it has been considered within the primary Aoi as a beneficiary of the Sub-project.

The collector lines will be located along existing road alignments and within public road corridors. Therefore, no passage through privately owned parcels is envisaged for the collector line routes. The collector line corridors are considered within the secondary Area of Influence of the Subproject, defined as a 250-meter corridor on both sides of the line routes.

Detailed spatial information regarding the collector line routes, their relationship with settlement areas, public road corridors, and surrounding cadastral parcels is provided in the ESMP.

Discharge Line

Treated effluent from the Kireli WWTP will be discharged to a dry creek bed through an approximately 250 m-long discharge line. Lake Beyşehir is considered the final receiving environment of the treated effluent.

The discharge line will be constructed within public road/easement corridors and will not pass through privately owned parcels. The alignment of the discharge line and its relationship with cadastral parcels and the receiving environment are presented in the ESMP.

Energy Supply

The Subproject will require electricity supply for the operation of the Kireli WWTP. No new energy transmission line will be constructed under the Subproject. In line with the opinion of MEDAŞ, only the relocation of an existing transformer pole is foreseen.

The relocation activity will be carried out within the boundaries of the existing KOSKİ-owned parcel and will not require any additional land acquisition or use of privately owned land. Existing energy transmission infrastructure will continue to be used for the electricity supply of the facility. Relevant correspondence and supporting information regarding the energy supply arrangement are provided in the ESMP annexes.

1.3 Location

The Sub-project site is located in Konya Province, Hüyük District, Kireli Neighbourhood, on Block 216, Parcel 32, with a total surface area of 5,145.39 m². The wastewater treatment plant site is owned by Konya Water and Sewerage Administration (KOSKİ). The parcel was purchased from Hüyük Municipality in 2017, and the ownership transfer was completed in the same year.

Following the land registry category/type change, the parcel has been officially registered as “Wastewater Treatment Plant Area”. Therefore, no new Agricultural Marginal Land Certificate is required for the project parcel. The updated title deed document will be included in the annexes of this report.

The Subproject will be constructed within the boundaries of the existing KOSKİ-owned parcel. There is an existing reinforced concrete structure on the site, which belongs to a previously initiated but incomplete wastewater treatment plant. This structure will be demolished within the scope of the Subproject, and the new WWTP units and auxiliary facilities will be constructed on the same parcel.

The wastewater collector lines will be located along existing road alignments and within public road corridors. The treated effluent will be discharged to a dry creek bed through an approximately 250 m-long discharge line, with Lake Beyşehir being the final receiving environment. Neither the collector lines nor the discharge line will pass through privately owned parcels.

Accordingly, no privately owned land will be used for the construction of the WWTP, collector lines, or discharge line under the Subproject, and no permanent or temporary land acquisition is envisaged.

1.4 Area of Influence

The Area of Influence (AoI) of the Sub-Project has been defined as a 500-meter radius around the WWTP site, taking into account the spatial extent of potential environmental and social impacts that may

arise during the construction and operation phases. The location of the sub project at the national and provincial levels is presented in Figure 1-1.

Figure 1-2 illustrates the sub project's potential Area of Influence (500-meter radius) together with the closest settlement area. During the determination of the Area of Influence, attention was given to the presence of sensitive receptors such as educational facilities, health services, places of worship, and residential areas. Based on the spatial assessment presented in Figure 1-2, no sensitive receptors are located within the defined 500-meter Aol boundary. The nearest settlement to the Subproject site is Kireli Neighbourhood. The Area of Influence (Aol) of the Subproject includes the wastewater treatment plant site located in Kireli Neighbourhood, the wastewater collector line routes extending through Kireli, Çavuş, Tolca, and Göçeri neighbourhoods, the discharge line, existing access roads to be used during construction, and the surrounding receptors that may be affected by construction and operation activities.

Although Çavuş, Tolca, and Göçeri neighborhoods are not located in the immediate vicinity of the WWTP site, they have been included within the Sub-project's Area of Influence (Aol) because the wastewater collector line routes pass through these neighborhoods. Although no new wastewater collector line will be constructed in İmen Neighborhood, it has also been included within the Aol as a beneficiary of the Sub-project, as it will continue to receive wastewater treatment services from the Kireli WWTP through the existing sewer network.

Sensitive receptors and stakeholder-related receptors located within the vicinity of the Subproject area and along the associated infrastructure routes are identified in Figure 1-3. These include:

- Kireli Şehit Kadir Kayhan Primary and Secondary School,
- Kireli High School,
- Kireli Family Health Center,
- Yeni Mosque and Yunus Emre Mosque,
- Privately owned agricultural lands,
- Seafood processing facility operating in Kireli Neighbourhood,
- Çavuş Village Cemetery,
- Prayer room located in Göçeri Neighbourhood,
- Callut Agriculture, Tourism and Aquaculture facility in Tolca Neighbourhood.

Access to the Subproject site will be provided through the existing local road network. The site is located in Kireli Neighbourhood and can be accessed via existing public roads currently serving the surrounding agricultural lands and settlement areas. No new access road construction is envisaged within the scope of the Subproject.

During the construction phase, machinery, equipment, and material transportation will utilize the existing road network. In addition, construction activities related to the collector lines may cause temporary and localized disturbances along the existing road corridors in Kireli, Çavuş, Tolca, and Göçeri neighbourhoods. These impacts are expected to be short-term and limited to construction areas.

Relevant traffic management, road safety, and community health and safety measures will be implemented in accordance with the ESMP. These measures will include traffic planning, speed limits, warning signs where necessary, coordination with local authorities and mukhtars, and timely information disclosure to local communities regarding construction-related traffic movements.

No permanent widening, modification, or realignment of existing roads is planned under the Subproject. Any minor temporary arrangements required during construction will be implemented in coordination with the relevant local authorities and will be reinstated upon completion of the works.

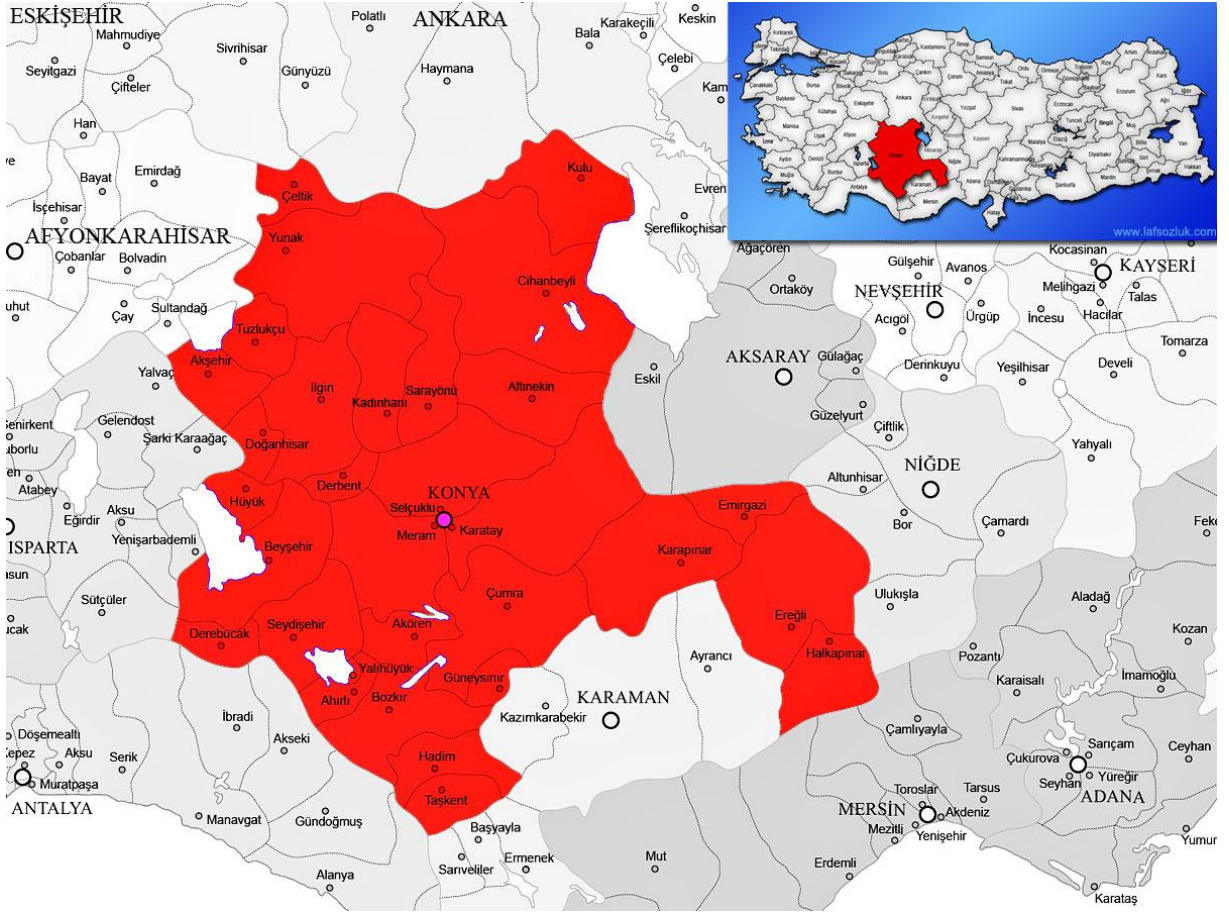


Figure 1-1 Display of Konya Province on the Map of Türkiye

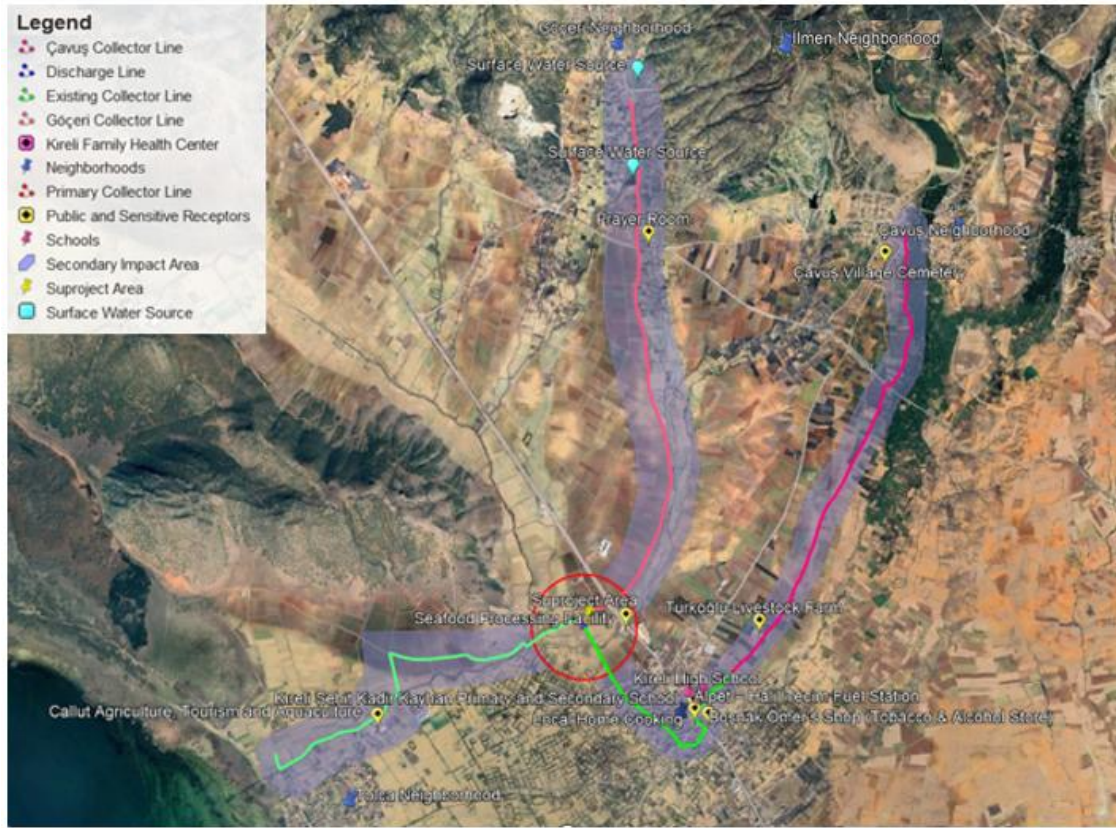


Figure 1-2 Project Potential Aol

2 Objective/Description of SEP

This SEP's objective is to establish a structured approach to stakeholder engagement, ensuring public information disclosure and consultation throughout the entire project cycle. It outlines how stakeholders will be engaged in the Subproject and provides a mechanism for raising concerns, providing feedback, or submitting complaints regarding project activities.

The SEP aims to guide the Sub-borrower to:

- Build and maintain a constructive relationship with all stakeholders, particularly affected communities.
- Incorporate stakeholders' views into the project design and ensure environmental and social performance considerations.
- Promote effective and inclusive engagement with all stakeholders and affected parties throughout the project lifecycle.
- Ensure timely, understandable, and accessible disclosure of project-related environmental and social risks and impacts.
- Provide inclusive and accessible channels for affected communities to raise issues and grievances, ensuring appropriate response and management.

This SEP includes (i) stakeholder identification and analysis, (ii) stakeholder engagement program, (iii) resources and responsibilities for implementing stakeholder engagement activities, (iv) grievance mechanism and (v) monitoring and reporting. KOSKİ is committed to implementing this SEP throughout all phases of the Project. The SEP has been developed in line with the requirements of ESS10 of the World Bank's Environmental and Social Framework, the Environmental and Social Management System (ESMS) of İLBANK and Turkish legislation. SEP is a living document, and it will be regularly monitored, reviewed and updated by the Sub-borrower.

3 Stakeholder Identification and Analysis

3.1 Methodology

In order to meet best practice approaches, the Project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The consultation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

Since the main finance source of GFC Project is WB; the subproject must comply with the İLBANK ESMS, good international practice, including WB ESSs, guidelines, and best practices documents alongside the national legislation. The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS)10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and the Project stakeholders as an essential element of good international practice." (World Bank, 2018, p.1) . Specifically, according to ESS10, the process of stakeholder engagement starts with stakeholder identification and analysis.

In order to identify relevant stakeholders for the Kireli Wastewater Treatment Plant (WWTP) Sub-Project and to ensure compliance with World Bank Environmental and Social Standard (ESS) 10, a combination of desk-based review and field-based consultation methods was applied.

The desk-based review included the examination of TurkStat demographic data, cadastral records, and official information obtained from local administrative sources and KOSKİ. These sources were used to understand the demographic structure, land ownership patterns, settlement characteristics, and potential stakeholder groups within the Area of Influence.

Field-based stakeholder engagement activities were conducted on 20 August 2025 by the POSEIDON project team. A site walk-through was carried out to observe existing land use patterns, access routes, surrounding receptors, and proximity to the nearest settlement. This on-site assessment enabled the team to verify spatial conditions and identify potential environmental and social sensitivities specific to the Sub-Project.

On the same date, face-to-face semi-structured interviews were conducted with the Mukhtar of Kireli Neighbourhood and relevant local stakeholders. The meetings were attended by an Environmental Engineer, an Occupational Health and Safety (OHS) Specialist, and a Sociologist from the POSEIDON team. The consultations focused on identifying local environmental and social concerns, community

expectations, existing wastewater and infrastructure conditions, sensitive receptors, vulnerable/disadvantaged groups, and potential construction-related impacts associated with the WWTP site, collector lines, discharge line, and access roads.

Since Çavuş, Tolca, İlmen and Göçeri neighbourhoods are also included in the Subproject's Area of Influence due to the wastewater collector line routes and their status as beneficiary settlements, stakeholder engagement activities also covered these neighbourhoods. The consultations aimed to understand local expectations regarding wastewater management, potential temporary impacts during collector line construction, access conditions, community health and safety issues, and the availability of grievance channels.

In addition, semi-structured interviews were conducted with local land users and households engaged in agricultural and/or livestock activities near the Subproject area. These consultations were carried out by the project Sociologist to better understand local livelihood patterns and to assess whether the Subproject may cause any temporary disturbance to agricultural activities, animal husbandry, access to land, or daily livelihood practices during the construction phase.

During the consultations, particular attention was given to identifying vulnerable or disadvantaged groups within the Area of Influence, in line with ESS10 requirements. The assessment of vulnerable groups was informed by interviews with the Mukhtar and field observations conducted on 20 August 2025. Detailed findings regarding vulnerable and disadvantaged groups are presented in Section 3.4 of this SEP.

This mixed-method approach ensured that stakeholder identification and analysis were grounded in both official records and direct, field-based community engagement specific to the Sub-project, thereby enabling an inclusive and context-specific stakeholder engagement strategy.

3.2 Project Affected Parties

Project Affected Parties are the persons, groups, and other entities within the Subproject's Area of Influence (Aol) that are directly or potentially influenced by the Subproject and/or have been identified as most susceptible to changes associated with the Subproject. These parties need to be closely engaged in the identification of potential impacts and their significance, as well as in the development and implementation of mitigation and management measures.

For the Kireli Wastewater Treatment Plant Subproject, the Area of Influence includes the WWTP site located in Kireli Neighbourhood, the wastewater collector line routes extending through Kireli, Çavuş, Tolca, İlmen, and Göçeri neighbourhoods, the discharge line, access roads to be used during construction, and the surrounding receptors that may be affected by construction and operation activities. Although Çavuş, Tolca, and Göçeri neighbourhoods are not located within the immediate vicinity of the WWTP site, they are included within the Subproject's Aol due to the presence of wastewater collector line routes and their status as beneficiary settlements. Domestic wastewater generated in Kireli, Çavuş, Tolca, and Göçeri neighbourhoods will be collected and conveyed to the Kireli WWTP for treatment.

The Subproject Aol includes residential areas, local roads, public road corridors, privately owned agricultural lands, sensitive/community receptors, economic activity areas, and local livelihood activities located in or around the beneficiary neighbourhoods and associated infrastructure routes. Accordingly, potential impacts may arise not only around the WWTP site, but also along collector line corridors, access routes, and the discharge line during construction.

In this Subproject, the following individuals, groups, and receptors fall within the category of Project Affected Parties:

- Residents of Kireli, Çavuş, İlmen, Tolca, and Göçeri neighbourhoods;
- Residents and road users who may experience temporary construction-related traffic movements along local roads and access routes;
- Users of public road corridors where wastewater collector lines and the discharge line will be constructed;
- Privately owned agricultural land users located within and around the Subproject Aol who may be temporarily affected by construction-related activities, access arrangements, dust, noise, or traffic movements;
- Households engaged in agricultural and/or animal husbandry activities near the Subproject site and associated infrastructure routes;
- The seafood processing facility operating in Kireli Neighbourhood;
- Sensitive and community receptors located in the beneficiary neighbourhoods, including Kireli Şehit Kadir Kayhan Primary and Secondary School, Kireli High School, Kireli Family Health Center, Yeni Mosque and Yunus Emre Mosque, Çavuş Village Cemetery, the prayer room in Göçeri Neighbourhood, and Callut Agriculture, Tourism and Aquaculture in Tolca Neighbourhood;
- Vulnerable and disadvantaged individuals/groups living in Kireli, Çavuş, İlmen, Tolca, and Göçeri neighbourhoods, including poor households, female-headed households, elderly individuals, persons with disabilities, unemployed persons, and households that may face barriers in accessing project information or grievance channels;
- KOSKİ employees and operational personnel who will be involved in the construction, operation, and maintenance of the WWTP and associated infrastructure;
- Contractors, subcontractors, suppliers, and service providers involved in the implementation of the Subproject.

Potential impacts on these groups are expected to be mainly temporary, localized, and construction-related. These may include temporary traffic disturbance, dust, noise, short-term access limitations, community health and safety risks, and temporary disturbance to agricultural or livelihood activities. During the operation phase, the Subproject is expected to generate positive impacts by improving wastewater management, reducing uncontrolled discharge of untreated wastewater, protecting water resources, and contributing to improved public health and environmental conditions in Kireli, Çavuş, İlmen, Tolca, and Göçeri neighbourhoods.

All Project Affected Parties identified above will be included in stakeholder engagement activities under this SEP. Appropriate information disclosure, consultation, and grievance redress mechanisms will be implemented to ensure that their views, concerns, and recommendations are received, assessed, and addressed throughout the Subproject lifecycle.

3.3 Other Interested Parties

The Project's stakeholders also include individuals, groups, and entities that may not experience direct impacts from the Project but may perceive their interests as being affected, or who may influence the Project and its implementation process.

These stakeholders include:

- Residents of Hüyük District outside the Area of Influence (Aol) and the mukhtars of indirectly affected settlements.

- Public institutions such as the Ministry of Environment, Urbanization and Climate Change, Ministry of Family and Social Services, Ministry of Labor and Social Security, Konya Provincial Directorate of Environment, Urbanization and Climate Change, Konya Provincial Directorate of Disaster and Emergency, Hüyük District Governorate, Hüyük District Directorate of Health, Directorate of Police, and Hüyük District Gendarmerie Command.
- Local administrations including Konya Hüyük Municipality and Konya Metropolitan Municipality.
- NGOs such as Hüyük District Social Assistance and Solidarity Foundation, Konya Industrialists' and Businessmen's Association (KONSIAD), and Hüyük Muhtar's Association.
- Media representatives, including Merhaba News and Yeni Konya Newspaper.
- Academia, particularly Selçuk University.

In addition, while sensitive receptors identified in the Area of Influence are located outside the defined 500-meter Aol boundary, they have been considered under Project Affected Persons (PAPs) due to their functional sensitivity and potential indirect exposure to project-related impacts.

Furthermore, local residents engaged in agriculture and livestock activities have been identified as PAPs, considering that construction-phase impacts such as increased traffic, noise, and temporary disturbances may affect grazing patterns, access routes, and overall livestock management practices.

Table 3-1 Stakeholder Identification and Analysis

Stakeholder Group	Category (PAP/OIP)	Type of Impact	Level of Interest	Level of Influence	of
Kireli, Çavuş, İlmen Tolca, and Göçeri neighbourhoods residents	PAP	Indirect (noise)	(traffic, High)	Low	
Livestock owners/farmers	PAP	Indirect (noise, traffic, access disruption)	High	Low	
Road Users	PAP	Direct (traffic safety)	Medium	Low	
Sensitive receptors which are:	PAP	Indirect	High	Medium	
• Kireli Şehit Kadir Kayhan Primary and Secondary School, • Kireli High School, • Kireli Family Health Center, • Yeni Mosque and Yunus Emre Mosque, • Privately owned agricultural lands, • Seafood processing facility					

operating in Kireli Neighbourhood, • Çavuş Village Cemetery, • Prayer room located in Göçeri Neighbourhood, • Callut Agriculture, Tourism and Aquaculture facility in Tolca Neighbourhood.				
Public Intitutions	OIP	Regulatory	High	High
Municipalities	OIP	Administrative	High	High
NGOs	OIP	Social	Medium	Medium
Media	OIP	Informational	Medium	Medium
Academia	OIP	Advisory	Low	Low

The analysis indicates that Project Affected Parties (PAPs), particularly local residents, livestock owners, and sensitive receptors, are expected to be affected mainly during the construction phase through indirect impacts such as noise, traffic, and temporary disturbances, resulting in a high level of interest but limited influence.

On the other hand, public institutions and municipalities have a high level of influence due to their regulatory and administrative roles, while NGOs, media, and academia have a moderate role in terms of information dissemination and advisory functions.

3.4 Vulnerable/Disadvantaged Individuals or Groups

Vulnerable or disadvantaged individuals and groups within the Subproject context are those who may face barriers in accessing information, participating in stakeholder engagement activities, raising grievances, or benefiting equally from project outcomes due to socioeconomic, demographic, physical, or health-related conditions.

For the Kireli Wastewater Treatment Plant Subproject, vulnerable and disadvantaged groups have been identified within the Area of Influence of the Subproject, which includes Kireli, İlmen, Çavuş, Tolca, and Göçeri neighbourhoods. These settlements are included within the Subproject's Area of Influence due to the location of the WWTP site, the wastewater collector line routes, associated infrastructure, and their status as beneficiary settlements.

Information regarding the presence of disadvantaged and vulnerable groups within the Subproject area was obtained through field consultations and interviews conducted with local representatives, including mukhtars and relevant local stakeholders. Based on the available information, the main vulnerability categories identified in the beneficiary neighbourhoods include poor households, female-headed households, elderly individuals aged 65 and above, persons with disabilities, and unemployed individuals. In İlmen Neighborhood, various vulnerable and disadvantaged groups have also been

identified, including poor households, female-headed households, elderly individuals, persons with disabilities, and unemployed individuals.

The data indicate that different forms of vulnerability exist across the beneficiary neighbourhoods. Kireli Neighbourhood, where the WWTP site is located, has the highest number of female-headed households and elderly individuals aged 65 and above. Çavuş Neighbourhood also has a significant number of poor households and elderly residents aged 65 and above. In Göçeri and Tolca neighbourhoods, poor households and unemployed individuals were identified, while Tolca also includes persons with disabilities.

In addition to the categories presented in the table below, households dependent on agriculture and/or livestock activities are also considered in stakeholder engagement planning, particularly where they may be exposed to temporary construction-related impacts such as access limitations, dust, noise, traffic movements, or short-term disturbance along collector line routes and local roads.

Special measures will be implemented to ensure the meaningful participation of vulnerable and disadvantaged individuals and groups. These measures will include the use of accessible and understandable communication methods, consultation meetings at convenient times and locations, involvement of mukhtars in information disclosure, provision of clear information on the grievance mechanism, and tailored support where needed to ensure that vulnerable groups can access project information and submit grievances without difficulty.

*Table 3-2 Vulnerable/Disadvantaged Individuals or Groups**

Neighbourhood	Poor Households	Female-Headed Households	Elderly Population (65+)	Persons with Disabilities	Unemployed
Kireli	28	150	150	-	-
Çavuş	50	30	150	-	-
İlmen	15	20	40	15	30
Göçeri	10	-	-	-	10
Tolca	15	-	30	6	15
Total	118	200	370	21	55

**Based on information obtained from the Mukhtar, no individuals with disabilities have been identified; therefore, no quantitative data are available.*

4 Stakeholder Engagement Program

The main objectives of the stakeholder engagement program and the planned schedule for the various stakeholder engagement activities are to define at what stages and at what intervals these activities will take place throughout the life of the project. If a decision has not yet been made about public meetings, locations and timing of meetings, information is provided on how people will be made aware of future opportunities to review information and offer their opinions.

4.1 Summary of Stakeholder Engagement Done During Project Preparation

20 August 2025, stakeholder engagement activities were carried out by POSEIDON within the scope of the Subproject. Face-to-face consultations were held at the neighborhood coffee house with the Mukhtars of Kireli, Çavuş, and Göçeri Neighborhoods, as well as with two households from Kireli engaged in farming. On 1 September 2025, phone consultations were conducted with the the owner of Callut Agriculture, Tourism and Aquaculture, Mukhtar of İlmen Neighborhood and Mukhtar of Tolca Neighborhood.

The meetings aimed to gather opinions and concerns regarding the planned Subproject and to ensure that the perspectives of local stakeholders were considered in the stakeholder engagement process. The consultations held are summarized below.

Kireli Neighborhood

Opinion on the Project:

- No concerns raised.
- Positive expectations within the community.
- Request for reuse of treated water in agricultural irrigation.

Consultations with Local Households:

- Two farming households consulted.
- Both support the project.
- Expect improvements in odor and mosquito problems.
- Emphasized benefits of treated water for irrigation.

Expected Additional Benefits:

- Improved irrigation opportunities.
- Reduced environmental pollution, improved soil and water quality.
- Enhanced quality of life due to reduced odor and insects.
- Strengthened agricultural productivity and socio-economic well-being.

Göçeri Neighborhood

Opinion on the Project:

- Full support expressed.
- Highlighted that untreated wastewater flows into Beyşehir Lake, causing pollution, and the Wastewater Treatment Plant is therefore considered necessary.

Çavuş Neighborhood

Opinion on the Project:

- Positive outcomes expected.
- No concerns raised.

Tolca Neighborhood

Opinion on the Project:

- Strong support expressed.
- Project expected to:
- Provide treated water for irrigation, reducing reliance on rainfall.
- Improve livestock conditions with cleaner water.
- Support sustainability of local agribusiness, including Callut.
- Reduce pollution, improve water quality, and create a healthier environment.
- Strengthen household income and local economy through higher agricultural productivity.

İlmen Neighborhood

- Population: 1,000 residents.

Socio-economic Situation:

- 15 poor households.
- 20 female-headed households.
- 30 unemployed individuals.
- 40 elderly (75+).
- 15 persons with disabilities.
- Majority age group: 25–50.
- Students (approx. 20) attend school in Hüyük via transport.
- Livelihoods: farming, pensions, limited livestock.

Opinion on the Project:

- Previous sewage problems were addressed quickly following consultations with KOSKİ.
- Communication with KOSKİ is considered strong and responsive.
- No concerns regarding the project; there is confidence that any issues can be resolved promptly in coordination with KOSKİ.

Consultation with Local Business Representative:

- The owner of Callut Agriculture, Tourism and Aquaculture (also a resident) was consulted.
- He expressed strong support for the project.
- Stated benefits include:
- Positive contributions to farming and livestock.
- Use of treated water for aquaculture.
- Reduced pollution and improved environmental quality.
- Odor reduction, improving life quality and tourism potential.
- Stronger socio-economic development benefiting local businesses.
- Majority age group: 25–50.
- Students (approx. 20) attend school in Hüyük via transport.
- Livelihoods: farming, pensions, limited livestock.

Opinion on the Project:

- Previous sewage problems were addressed quickly following consultations with KOSKİ.
- Communication with KOSKİ is considered strong and responsive.
- No concerns regarding the project; there is confidence that any issues can be resolved promptly in coordination with KOSKİ.

General Views on the Project

- Across all neighborhoods, stakeholders expressed support for the project.
- Commonly highlighted benefits: reuse of treated water for irrigation, improvements in agriculture and livestock, resolution of odor and mosquito problems, and prevention of water pollution (especially in Beyşehir Lake).
- Stakeholders also emphasized improved environmental quality, health, and socio-economic well-being.
- Communication with KOSKİ is viewed as effective, strengthening confidence in problem-solving.

No major concerns or opposition were raised during the consultations.

It should be noted that the local roads surrounding the Subproject site are relatively narrow and are also used by local residents, agricultural land users, and vehicles serving nearby farming activities. In addition, privately owned agricultural lands are located in very close proximity to the project parcel. Therefore, although no land acquisition or land use restriction is anticipated under the Subproject, construction activities may create temporary and localized risks such as traffic disturbance, restricted maneuvering space, dust generation, short-term access limitations, accidental entry into adjacent agricultural lands, and potential damage to crops or field boundaries. Those issues are evaluated in detail in sub project's ESMP.

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

Focus group discussions (FGDs) will be the main public consultation tool especially during the beginning period of the construction phase where common questions are expected to be asked and similar opinions will be expressed by the locals and the consultation meetings will be done in a more participative methodology.

Stakeholder Consultation Meetings (SCMs) are planned as structured engagement activities to inform stakeholders, collect feedback, and ensure participatory decision-making throughout the Project lifecycle.

The first Stakeholder Consultation Meeting (SCM) of the subproject will be held following the approval of the draft ESMP report in a selected venue in Kireli, which will have sufficient capacity and facilities, thus facilitating comfortable and efficient communication. Above-mentioned PAPs and OIPs will be invited to the SCM.

Prior to the SCMs, announcements will be published in local and national newspapers, and on KOSKİ's official website. Project information brochures will be distributed 10 days prior to the meeting to the participants before the meetings begin and subproject maps will be made available in the brochures and in public places like village tea houses, mukhtars' offices. Not only will announcements be made through official means, but also the involvement of the local people will be encouraged by contacting the mukhtars prior to the meeting. In order to encourage their participation in the meeting and raise awareness about the project.

In addition to official announcements, local participation will be encouraged by the Social Expert of KOSKİ through direct engagement with community leaders. Neighborhood visits will be carried out according to the construction activities calendar. Mukhtar(s) and local people will be informed in detail about the project and the grievance mechanism within the project through consultation meetings. A reconnaissance tour will be carried out in the area where the construction activities will be carried out

step by step with the mukhtar and special visits will be made to the households. Consultation meetings will be held with these households.

Consultation meetings will begin with an introduction and an explanation of the purpose and scope of the meeting, and followed by a final discussion session where questions, concerns and suggestions were taken after the presentations made by KOSKİ.

The main topics which will be covered in the presentations are as follows:

- Aim and the coverage of the subproject.
- What are the expected benefits of the Project?
- What are Environmental and Social Negative Impacts? An overview of the anticipated environmental and social negative impacts of the project and the measures suggested to mitigate these (participants will be invited to discuss any additional negative impacts they might foresee and offer views on whether the planned measures are sufficient or suggest alternative or additional measures)
- Grievance mechanism
- Discussion (Questions and Answers) Session

Consultation meetings will be conducted in a participative manner. The locals will be encouraged to express their own ideas about the project and their opinion in order to minimize the negative social impacts of the project. A leaflet will be prepared covering those topics and will be distributed during the consultation meetings and will be distributed in public places. The leaflet will include the communication information of the required contact phone numbers and email addresses and during the consultation meetings, the locals will be encouraged to contact subproject social experts.

Other methods for stakeholder engagement:

Regular site visits aiming face-to-face meetings will be implemented by the contractor company social expert in order to:

- Carry out grievance processes,
- Further disclosure of the project,
- Identifying any population change which may bring existence of any disadvantaged/vulnerable person.

Site visits can also be done with the demand of a local, while the visit of the locals to the subproject management offices can also be defined as a tool for stakeholder engagement activity.

Phone calls or text messages can be preferred according to certain circumstances but preferable meeting technique is to conduct the meetings face-to-face.

4.3 Stakeholder Engagement Plan

Stakeholder engagement under the Kireli WWTP Sub-Project will follow a structured process in line with ESS10 requirements. First, draft environmental and social documents (ESMP and SEP) will be disclosed. Following the disclosure period, a Public Participation Meeting (PPM) will be conducted. Comments received during the consultation process will be evaluated and incorporated into the revised documents. Final versions of the ESMP and SEP will then be disclosed and remain publicly accessible throughout the Project lifecycle.

The list and categorization of identified stakeholders, including vulnerable and disadvantaged groups, are provided in Section 3 of this SEP. Efforts will focus on proactive engagement regarding community health and safety, aiming to mitigate risks as effectively as possible. Additionally, a rapid response system will be in place to address stakeholder concerns, incorporate feedback, and resolve any issues efficiently.

During the construction phase, several information-sharing activities will be carried out to ensure transparency and effective communication with stakeholders:

- **Brochure Distribution:** Informational brochures will be delivered to local businesses and headmen offices within the Subproject area while general project information will be displayed on signage placed along main pedestrian corridors. These brochures will include details on the construction timeline, the grievance mechanism, and the contact information of the Social Expert.
- **On-Site Information Boards:** Information boards will be placed at the entrances to construction sites, providing citizens with details about ongoing construction activities and the grievance mechanism.
- **Contractor Communication:** The contractor's representative will maintain regular contact with neighbourhood mukhtar near the Subproject area.
- **Health and Safety Measures:** Safety signs and notices will be installed at Subproject locations, including main pedestrian corridors, entrance of construction sites, and surrounding areas to protect public health and safety.
- **Permit and Institutional Coordination:** All necessary permits will be secured in accordance with Subproject requirements, and relevant authorities will be informed as needed.

Information on the Grievance Mechanism will be disseminated through multiple channels, including brochures, public announcements, information boards at the site, mukhtar offices, and online platforms. Details on grievance uptake channels (such as ALO 153, e-municipality systems, and online forms) will be clearly communicated to ensure accessibility for all stakeholders.

Specific communication measures will be implemented for traffic and construction-related impacts. These include advance notifications of road closures or diversions, placement of directional signage, announcements through mukhtars, and dissemination of information via local communication channels to ensure that all affected stakeholders are informed in a timely manner.

These measures aim to ensure that stakeholders are well-informed and that concerns related to construction activities are promptly addressed.

A variety of engagement techniques will be utilised to facilitate two-way communication, allowing stakeholders to receive relevant information while also sharing their input. The selection of communication tools and consultation methods will be tailored to different stakeholder groups, considering their specific needs, concerns, and level of influence in the Subproject.

Specific measures will also be implemented to ensure the effective participation of women, including women-headed households. These measures include organizing meetings at convenient times, selecting accessible and culturally appropriate locations, and ensuring inclusive communication approaches during consultations.

Special engagement measures will be implemented for vulnerable and disadvantaged groups. These include simplified and accessible information materials, distribution of brochures through mukhtars, direct face-to-face meetings, and the use of visual materials where necessary. In addition, GRM information will be clearly communicated through multiple channels to ensure accessibility.

Further details on the consultation and information-sharing approach are outlined in Table 4-2, which presents the overall consultation and information disclosure strategy

Further consultation activities during construction and operation phases will be implemented proportionate to the scale of impacts and stakeholder needs. Engagement frequency and methods will be tailored to each stakeholder group as presented in Table 4-1.



Table 4-1 Methods, responsibilities and timing of the stakeholder engagement.

Project Stage	Target Stakeholders	Documents to be Disclosed	Topic of Consultation / Message	Method Used	Frequency / Timeline
Pre-construction phase	-PAPs -Vulnerable/ Disadvantaged Individuals/ Groups -OIPs	Draft ESMP and SEP of the sub Project to be disclosed and consulted for finalization	- Purpose, stages, general information about the sub-Project - Anticipated E&S impacts and risks - Proposed mitigation measures - Grievance Mechanism - Monitoring objectives and activities to be performed - E&S documents (ESMP and SEP)	KOSKİ website and online disclosure platforms; availability at local administrative offices; distribution of printed materials (brochures, information notes); public announcements; disclosure in public places (mukhtars' offices, schools, mosques, tea houses); grievance mechanism channels (ALO 153, e-municipality, online forms); face-to-face meetings with local communities and mukhtars; stakeholder consultation meetings and documentation (participant lists, photos, records)	Before the start of Land preparation and construction activities, before the start of Operation activities and when there is a significant change in the project.
Land preparation and construction phase	-PAPs -OIPs	Final ESMP and SEP of the subproject	Information Disclosure - Purpose, start date, duration, and nature of land preparation, construction, and operations activities - Grievance Mechanism	Stakeholder Consultation Meetings (SCMs) and Focus Group Discussions (FGDs), as described in	SCMs (Monthly in construction phase, annually in operation phase) FGDs (only in construction phase, according to need)

Project Stage	Target Stakeholders	Documents to be Disclosed	Topic of Consultation / Message	Method Used	Frequency / Timeline
Operation phase			- Status and effectiveness of implementation of mitigation measures related to relevant E&S impacts/risks - Monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results - E&S documents (ESMP and SEP)	Section 4.2, along with face-to-face meetings.	Face-to-face meetings (weekly in operation phase)
Land preparation and construction phase	-PAPs -OIPs -Vulnerable/ Disadvantaged Individuals/ Groups	Final ESMP and SEP of the subproject	Social progress, economic and social development, and environmental protection Information and consultation on: - Mitigation measures against potential E&S impacts/risks - Grievance Mechanism - Sustainability Traffic and Transportation Management - Within the scope of the sub-project, road safety awareness. - Types, number and frequency of vehicles that will be used in construction phase. - Cooperation with local communities and responsible authorities to improve signage, visibility, and overall safety on roads where the construction activities will be held. - Communication of traffic measures and Project Road usage with mukhtars - Grievance Mechanism	SCMs FGDs Face-to-face meetings Media Communication	SCMs monthly during construction phase, annually during operation phase) FGDs (according to need) Face-to-face meetings (weekly) Media communication (in need)
Operation phase					

4.4 Disclosure of Information

The sub project documents including ESMP and SEP will be disclosed in Turkish and English through the current KOSKİ website (<https://www.koski.gov.tr/>). The sub project documents will be accessible at the KOSKİ office and the Hüyük district municipality. Sub project posters and information regarding the grievance mechanism will be distributed at local locations in the districts, including Mukhtar's office, schools, mosques, and local tea houses. The brochures that have been approved by İLBANK will contain information regarding the project, the grievance mechanism, and contact information. Additionally, KOSKİ's website will feature sub project updates, such as news regarding construction activities and major E&S data. KOSKİ will ensure that its website is consistently updated and maintained.

4.5 Proposed Strategy to Incorporate the Views of Vulnerable Groups

KOSKİ will implement specific measures to ensure that vulnerable and disadvantaged individuals and groups are effectively engaged and their views are incorporated into Project planning and implementation.

Vulnerable groups may include, but are not limited to, low-income households, elderly individuals, people with disabilities, women-headed households, and other groups who may face barriers to participation due to social, economic, or physical constraints.

To ensure meaningful and inclusive engagement, KOSKİ will adopt targeted strategies, including:

- Conducting targeted consultations with vulnerable and disadvantaged individuals/groups to understand their specific needs, concerns, and barriers to accessing project-related information and services
- Identifying and engaging community leaders, representatives, and relevant organizations to facilitate outreach to these groups
- Coordinating with non-governmental organizations (NGOs) and associations working with vulnerable groups, where applicable
- Organizing focus group discussions (FGDs) and small-scale meetings tailored to the needs and sensitivities of these groups
- Ensuring that communication materials and engagement approaches are culturally appropriate and accessible

In addition, KOSKİ will implement supportive measures to enhance participation of vulnerable groups in stakeholder engagement activities, including:

- Selecting accessible venues for consultation meetings
- Providing transportation support for individuals in remote or rural areas, where necessary
- Organizing tailored meetings depending on specific needs (e.g. meetings supported by sign language interpretation)
- Scheduling meetings at appropriate times to ensure participation of working individuals
- Providing alternative communication channels such as brochures, social media, project website, and individual face-to-face meetings for those unable to attend consultation events

These measures aim to ensure that vulnerable and disadvantaged groups are not excluded from the stakeholder engagement process and that their perspectives are adequately considered throughout the Project lifecycle.

4.6 Reporting Back to Stakeholders

KOSKİ will ensure that feedback received from stakeholders through consultation meetings, grievance mechanisms, the project website, and other engagement activities is systematically recorded, reviewed, and addressed.

All comments, suggestions, and grievances will be evaluated by the responsible staff within the Project Implementation Unit (PIU), including the Grievance Mechanism Contact Person (GMCP), in coordination with relevant contractor representatives where applicable.

Based on the evaluation results, appropriate actions will be identified. The outcomes, including decisions taken, proposed actions, and implementation timelines, will be communicated back to stakeholders through their preferred communication channels, where available.

If a comment or request cannot be addressed within a reasonable timeframe, justification will be provided and alternative solutions will be explored.

Stakeholders will be kept informed about the environmental and social performance of the Project, including the implementation of mitigation measures, through regular updates on the KOSKİ website and during stakeholder engagement activities.

During the construction phase, specific updates such as road restrictions, water cuts, and other service interruptions will be communicated in advance through appropriate communication channels.

This approach ensures a continuous feedback loop, promotes transparency, and strengthens trust between KOSKİ and stakeholders throughout the Project lifecycle.

5 Resources and Responsibilities for Implementing Stakeholder Engagement Activities

As summarized in Section 1, the sub-project will be financed through the GFC signed between the World Bank and İLBANK. The World Bank finances the project, while İLBANK acts as the financial intermediary and manages safeguards through its Environmental and Social Management Unit (ESMU), which includes environmental, social, and OHS experts.

At the sub project level, KOSKİ has also established a Project Implementation Unit (PIU) and appointed one environmental expert, one social expert and one OHS expert to manage the safeguard issues in the sub project per the sub loan agreement signed between the İLBANK and the KOSKİ.

For the implementation of the subproject, KOSKİ will sign contracts with the supervision consultant—for the supervision of construction works— and with the contractor—for the construction works. Both the supervision consultant and the contractor will have E&S teams consisting of one environmental expert, one social expert and one OHS expert.

5.1 Resources

The PIU will be primarily responsible for coordinating stakeholder engagement activities with the Contractors as outlined in this SEP. The collection of grievances, questions and feedback will be the direct responsibility of the GM contact person (GMCP) of the PIU and the Contractors' E&S Specialist.

The resources to be provided by KOSKİ are given below:

- A project-specific area on the KOSKİ's official website,
- An electronic database for grievance records,
- Stakeholder engagement records,
- Printed documents (manuals, brochures, posters, etc.) to be used in accordance with SEP requirements.

The contact information of the responsible personnel has not been available yet. Therefore, contact details such as phone number, address, e-mail address, title, etc. will be given in this section of the SEP to be updated.

Adequate budget will be allocated for communication with stakeholders and grievance resolution mechanism. The budget is included in the project budget.

5.2 Management Functions and Responsibilities

The overall responsibility for the implementation of this SEP lies with the PIU manager. The entities responsible for carrying out stakeholder engagement activities are the PIU and the contractor. The social expert of the PIU and the contractor's social expert will be in charge of stakeholder engagement activities. Comments or questions about the project or the consultation process can be conveyed through:

Konya Büyükşehir Belediyesi Su ve Kanalizasyon İdaresi Genel Müdürlüğü (KOSKİ)

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PIU Social Expert:

Reyyan ERDOĞAN

Department of Human Resources – Social Expert

The stakeholder engagement activities will be documented through consultation forms by KOSKİ social expert. (See Annex-E: Public Consultation Form) A brief summary of consultation meetings will be reflected in monthly and quarterly reports including the format of the consultation meetings, content of the meetings and the basic issues mentioned by the stakeholders and their responses.



6 Grievance Mechanism

The primary aim of the grievance mechanism is to facilitate the prompt, effective, and fair resolution of complaints and concerns, ensuring the satisfaction of all parties involved. The mechanism is designed to:

- Enable the identification and unbiased, timely, and efficient resolution of Subproject-related issues.
- Enhance accountability to beneficiaries, including stakeholders affected by the Subproject.
- Offer stakeholders a structured platform to provide feedback and voice their concerns.

Confidentiality of the grievances will be duly observed throughout all processes. All processes defined under following steps regarding the registration and management of Project-related grievances and feedback will be undertaken by observing the requirements stipulated by the Law on the Protection of Personal Data (No 6698).

KOSKİ will not tolerate reprisals and retaliation against project stakeholders who share their views the subproject.

6.1 Grievance Mechanism at National Level

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

Presidency's Communication Centre (CİMER):

The Presidency's Communication Centre (CİMER) serves as a centralized complaint system for Turkish citizens, legal entities, and foreigners, accepting applications exclusively in Turkish.

Through CİMER, applicants can directly submit their requests to the relevant authorities. Submitted grievances are typically resolved within 30 days. If no response is received within this period, applicants have the option to resubmit their complaint to CİMER or escalate it to the Ombudsman Institution (www.ombudsman.gov.tr).

- **CİMER Website:** www.cimer.gov.tr
- **CİMER Call Centre:** 150
- **CİMER Phone Number:** +90 312 525 55 55
- **CİMER Fax Number:** +90 0312 473 64 94
- **Address for Official Letter:** Republic of Türkiye, Directorate of Communications Kızıllırmak neighbourhood Mevlana Bulvarı No:144 ÇANKAYA/ANKARA

The Foreigners Communication Centre (YİMER):

The Foreigners Communication Center (YİMER) offers a centralized complaint system specifically for foreigners. It will be accessible to Subproject stakeholders as an alternative and widely recognized platform for submitting Subproject-related grievances and feedback directly to state authorities.

- **YİMER Website:** www.yimer.gov.tr
- **YİMER Call Centre:** 157
- **YİMER Phone Number:** +90 312 5157 11 22



- **YIMER Fax Number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca neighbourhood 122. St. No: 4 Yenimahalle/ANKARA

ILBANK GM

- **Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **Phone Number:** 0(312) 508 79 79
- **Address for Official Letter:** Emniyet neighbourhood Hipodrom street No:9/21 Yenimahalle/ANKARA
- **E-mail:** uidbbilgi@ilbank.gov.tr

6.2 Subproject Level Grievance Mechanism

Information about the grievance mechanism and its uptake channels will be communicated to stakeholders through brochures, information boards, mukhtar offices, public announcements, and online platforms to ensure accessibility for all stakeholders.

External stakeholders can submit grievances or comments through the following channels. Grievances can be submitted anonymously, and confidentiality will be ensured throughout the process:

- **Grievance/comment boxes and forms**, which will be placed in accessible public locations such as sub project area, neighborhood headmen offices.
- **Face-to-face meetings or visits**, where Subproject personnel (e.g., site chiefs, managers, CLOs in PIU) will be available to receive feedback.
- **Telephone**, with designated contact numbers for the CLO in PIU.
- **E-mail**, with an official email address for grievance/comment submission to be provided to local communities in due course.
- **Website**, where the CLO's in PIU contact details will also be made available for stakeholders.

Sub-borrower Level GM

Sub-borrower (KOSKİ) accepts citizens' requests and complaints via Alo 185 Solution Centre, official website, e-mail and social media. Applications are directed to relevant units, reviewed and the applicant is contacted about the result. Sub-borrower aims to increase service quality and ensure citizen satisfaction with this system.

- Web site: <https://www.KOSKI.gov.tr/>
- E-mail: bilgi@KOSKI.gov.tr
- Phone number: +90(332) 221 61 00
- Hot Line: Alo 185
- Fax number: +90(332) 235 46 34
- Address for Official Letter / Petition: İhsaniye Mh. Kazım Karabekir Cd. No :56 42060 Selçuklu/Konya

and Figure 6-2). In addition, many parts of the home page of KOSKİ's website include information on social media accounts and telephone numbers where grievances can be submitted.

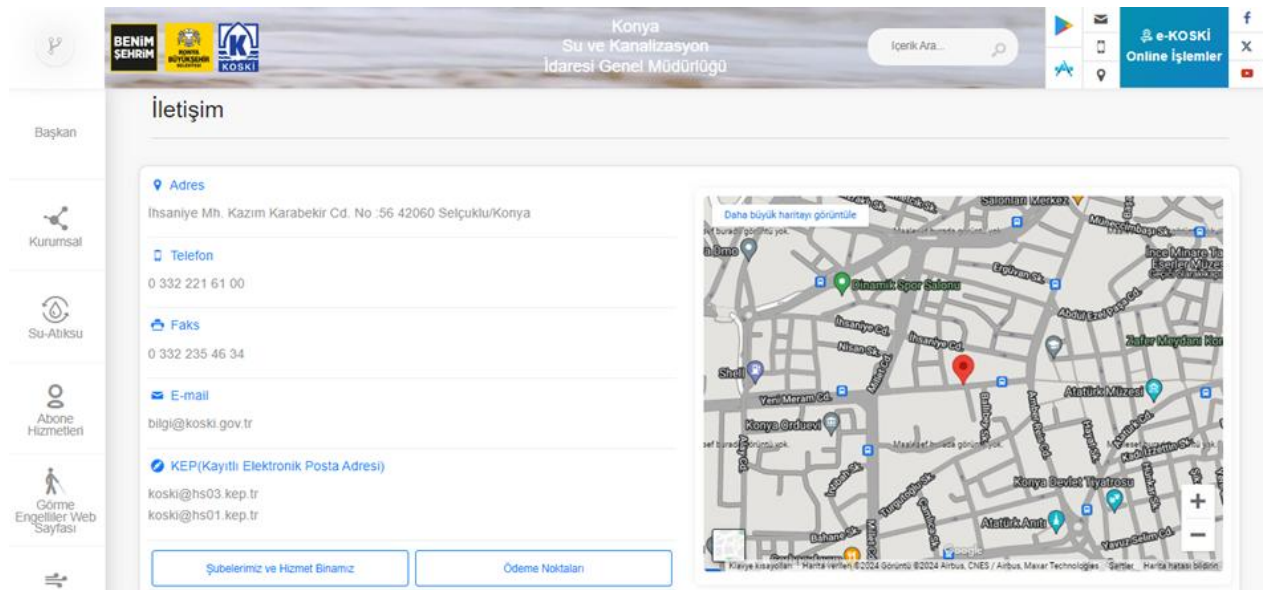


Figure 6-1. KOSKİ Contact Page - I

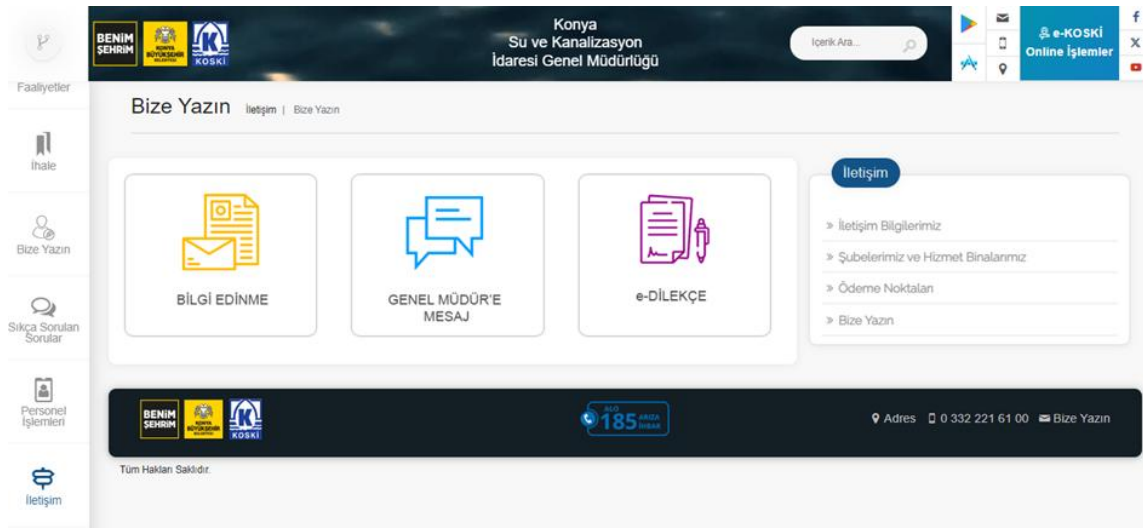


Figure 6-2 KOSKİ Contact Page - II

Initially, the KOSKİ Social Expert acknowledges receipt of a grievance within two days through a Grievance Form (see Annex-A: Grievance Form). The grievance will then be recorded in the grievance database maintained by the KOSKİ PIU (see Annex-B: Grievance Database Form), followed by an investigation led by the same expert to determine an appropriate resolution. This step will be completed within ten working days and will involve a Grievance Committee composed of representatives from the contractor and KOSKİ. Monthly monitoring and evaluation will be conducted, with data collected at the contractor's office and reported to KOSKİ and İLBANK in the first week of each month. Feedback on satisfaction with the grievance resolution will be gathered within two weeks of file closure by the KOSKİ Social Expert. If necessary, reparations for losses or damages will be handled by the KOSKİ Social Expert, with compensation provided within 15 days, either in kind or in cash.

Contractor GM

If the grievance is made directly to contractor's social expert, the GM process starts immediately after the grievance is applied. After that, he/she drafts the response and submits it to Project Management for approval. Following the approval, the required actions will be carried out, and the grievance will be closed within 15 days following the confirmation from the complainant and recorded to grievance closeout form (See Annex-C: Grievance Closeout Form). The method of communication with the complainant should always be the one preferred by the complainant.

The social expert of the contractor will be responsible for taking grievances and evaluating them. This individual will then directly address the issue by utilizing the protocols that have been developed for the sub project. All cases of grievance must be resolved within fifteen days of the submission, and if a resolution cannot be reached within this period, the complainant must be informed of the cause for the delay in a clear and concise manner. If the individual who filed the grievance is dissatisfied with the resolution that was provided at this level, they have the option to escalate the grievance to KOSKİ, where a more extensive assessment will be undertaken. Additionally, the 15-day timetable will be adhered to, and an explanation will be provided for any delay that may occur. The complainant has the option to further escalate the grievance to İLBANK for an additional layer of oversight and resolution attempts, while retaining the same resolution timetable. The complainant will be informed of their ability to pursue legal remedies through the local courts in the event that none of these existing options are successful in satisfying their needs. The contractor project manager is responsible for ensuring that detailed documentation and transparent communication are maintained during each stage. This ensures that the complainant is provided with clear information regarding their rights and the options that are accessible to them.

Additionally, the management and E&S staff of the contractor must ensure adequate environmental and social capacity for effective GM implementation at the subproject level, as set out in construction contracts. They will appoint a social expert to manage daily GM operations and participate in training sessions organized by the supervision consultant, KOSKİ, or İLBANK. Grievance logs and databases are to be updated regularly, distinguishing between public and workers' grievances. Monthly reports to KOSKİ should include transparent information on received grievances, with İLBANK and KOSKİ representatives allowed access to records. The contractor must implement actions for successful grievance management in line with the GM and promptly notify the KOSKİ PIU of any significant project-related grievances from workers or the public.

The complainant will be informed about the outcome of the grievance and the actions taken through their preferred communication channel (e.g. phone, e-mail, face-to-face communication). Feedback on satisfaction will be collected to ensure closure of the grievance process.

6.3 Workers' Grievance Mechanism

In addition to Project's GM, the contractor and the supervision consultant will also establish their Workers' Grievance Mechanisms (WGMs) per the requirements of ESS2 of the ESF on Labor and Working Conditions. Workers, who provide services for the Project in exchange for wage/salary, who wish to use the WGM will be kept anonymous, at their request, and the identity of the complaining employee will be kept strictly confidential. Any loss of employment rights due to an employee's use of the WGM would constitute a very serious breach of contract between the contractor and the KOSKİ or the supervision consultant and the KOSKİ.

6.4 Sensitive and Confidential Grievances

Specific procedures will be implemented by the sub-project to address sensitive and confidential grievances, particularly those related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), in line with the World Bank ESF Good Practice Note on SEA/SH and the project-specific SEA/SH procedures.

A survivor-centered approach will be adopted at all times, ensuring that the safety, dignity, well-being, and informed consent of the survivor are prioritized. No action will be taken without the explicit consent of the complainant.

Confidential reporting channels will be established to allow individuals to safely submit SEA/SH-related grievances. These may include dedicated communication channels such as designated email addresses, call centers, and direct reporting to trained focal points within KOSKİ and the Project Implementation Unit (PIU). In addition, complainants may directly contact the Ethics Committee established at İLBANK Head Office for sensitive grievances. All SEA/SH-related complaints will be handled with strict confidentiality, and information will be shared strictly on a need-to-know basis.

Upon receipt of a SEA/SH-related complaint, the grievance will not be subject to investigation by the project. Instead, with the explicit consent of the survivor, the case will be immediately referred to appropriate service providers, including medical, psychosocial, and legal support services, in accordance with the established referral pathway. Referral processes will be coordinated, where relevant, with designated Social Focal Points at İLBANK.

Designated social specialists within the Project Implementation Unit (PIU), in coordination with İLBANK, will be responsible for managing SEA/SH-related grievances and ensuring appropriate referral. The identity of the complainant will be protected at all times, and no information will be disclosed without consent. No personally identifiable information will be recorded in the grievance logs. Only non-identifiable information such as the type of grievance, date, and status of the case will be documented.

In addition, awareness-raising and training activities on SEA/SH will be conducted for project workers and relevant stakeholders to ensure understanding of prevention measures, reporting mechanisms, and response protocols. These activities will be implemented in coordination with KOSKİ, contractors, and relevant units of İLBANK.

Disciplinary measures and accountability mechanisms will be applied in line with national legislation and project policies in cases of misconduct, while ensuring that survivor protection principles are strictly upheld.

6.5 Summary of Roles and Responsibilities

The summary of the roles and responsibilities of the KOSKİ PIU, construction supervision consultant and the contractor teams at the implementation of the Project GM is set out in Table 6-1

Table 6-1 Project-level Roles and Responsibilities related to GM Implementation

Party	Role	Key Responsibilities
KOSKİ	PIU Manager	- Ensure that GM is implemented effectively by KOSKİ and the contractor staff - Appoint staff (social expert) who will be responsible for day-to-day implementation of the GM.

Party	Role	Key Responsibilities
		- Ensure that social requirements incorporated to the contractor and supervision consultant tender documents and contracts adequately cover the requirements on the GM implementation - Allocate resource to ensure monitoring of project E&S performance (including monitoring of GM implementation) and reporting to ILBANK at WB standards in line with the sub-loan agreement conditions
	Social expert	<u>Grievance Management/Resolution:</u> - Hold responsibility for day-to-day implementation of the GM by KOSKİ, supervision consultant, and contractor staff in line with the principles of ILBANK GM and processes specified in this SEP. - Review the veracity and eligibility of the grievances received from the public and Project workers within the context of their relevance to the Project related operations based on their knowledge of the regional and local dynamics and classify them per their priority and sensitivity - Ensure that eligible grievances are registered, investigated and managed/resolved in line with the GM, while SEA/SH-related grievances are handled in accordance with the SEA/SH-specific grievance mechanism (SEA/SH GM) procedures - Notify the PMU social expert about the grievances found ineligible (upon conclusion of ineligibility) - Coordinate with the environmental expert for the management of grievances related to environmental subjects - Ensure implementation of actions by related KOSKİ or contractor staff for the successful management/resolution of grievances in line with this GM - Ensure that grievance logs are regularly updated with necessary input from supervision consultant and the contractor; regularly maintain the database and keep it up to date - Perform mediation role or designate staff for such role among KOSKİ PIU staff for successful resolution of grievances as required of if requested by ILBANK Social Expert - Ensure the implementation and monitoring of SEA/SH prevention requirements in coordination with relevant stakeholders. - Conduct awareness-raising activities on SEA/SH for communities within the Area of Influence (AoI) <u>Information and Training:</u> - Participate in the training sessions (including GM requirements) to be organized by ILBANK - Train the construction supervision consultants and contractors for collection, registration and management of grievances in line with this GM <u>Monitoring and Reporting:</u> - Undertake periodic monitoring of Project E&S performance (including GM implementation) and reporting to ILBANK at WB standards in line with the sub-loan agreement conditions - Provide ILBANK with relevant adequate and transparent information on the grievances received as part of periodic reporting

Party	Role	Key Responsibilities
		- Allow ILBANK representatives to access grievance records. - Carry out regular media review to identify any grievances or issues raised (including related social media platforms) related to the Project and include the findings within the periodic reports
	Environmental & OHS Experts	Participate to the activities to be coordinated by the social expert of the PIU for GM for the management of grievances related to environmental &OHS subjects
Supervision Consultant	Management and E&S staff	- Carry out the GM-related tasks delegated by KOSKİ - Ensure sufficient E&S capacity for effective implementation of the GM; appoint staff who will be responsible from day-to-day implementation of the GM - Ensure that the grievance and feedback collection channels defined in the GM is made available in subprojects - Collect any written grievances submitted by the aggrieved parties (applicants) through the available channels (e.g. grievance boxes, forms submitted to contractors, etc.) on a weekly basis on behalf of KOSKİ and deliver these to the KOSKİ's social expert. - Participate in the training sessions (covering GM requirements) to be organized by KOSKİ - Promptly notify the KOSKİ of any significant Project-related grievance received from Project workers or public
Contractor	Management and E&S staff	- Ensure sufficient E&S capacity for effective implementation of subproject-level GM developed by the sub-borrowers as set out in the construction contracts; appoint staff (at least one female and one male) who will be responsible from day-to-day implementation of subproject-level GM - Participate in the training sessions (covering GM requirements) to be organized by supervision consultant, KOSKİ or ILBANK - Update the grievance logs and databases of subprojects regularly based on verbal and written grievances received (separately for public and employee grievances) - Provide KOSKİ with relevant adequate and transparent information on the grievances received as part of monthly reporting - Allow ILBANK and KOSKİ representatives (including supervision consultants) to access grievance records. - Ensure implementation of actions by related contractor or sub-contractor staff for the successful management/resolution of grievances in line with the GM - Promptly notify the KOSKİ PIU of any "significant" Project-related grievance received from Project workers or public - Support the implementation of SEA/SH requirements and ensure worker awareness of SEA/SH risks and reporting mechanisms.

7 Monitoring and Reporting

KOSKİ will monitor the Project throughout its lifetime considering the stakeholder engagement process. The approved SEP will be reviewed biannually and updated if required according to the project improvements and the unexpected public reactions. The GM established by the KOSKİ will be used effectively and the statistical summary of the outputs of GM will be reported to İLBANK together with all the requests received, resolved and unresolved, Grievance Register, Grievance Monitoring Table and Environmental and Social Monitoring Reports (ESMRs) on a monthly basis. With monthly reporting, total number of grievances, monthly number of grievances, distribution of grievances by subject, gender, grievances answered within 7 days, grievances resolved within 30 days, list etc. is necessary.

Stakeholder engagement and grievance mechanism will be submitted in a dedicated section in ESMRs, together with Grievance Register.

As part of project progress reports, the GM and its performance will need to be reported regularly to the Bank. Statistics of grievances should be reported to the WB on a quarterly basis in project progress reports.

A set of Key Performance Indicators (KPIs) will also be monitored and regularly integrated by the project into the project progress report, including the following parameters:

- i. Number of all grievances received in a reporting period,
- ii. Distribution of requests received within a reporting period (gender, province, type, etc.),
- iii. Number and percentage of resolutions within the prescribed timeline, and
- iv. Number of grievances open for more than 30 days for the reasons explained.
- v. Number of stakeholder engagement activities conducted during the reporting period, disaggregated by project phase (pre-construction, construction, operation),
- vi. Dates and locations of stakeholder meetings and consultation activities,
- vii. Number and type of participants involved in stakeholder engagement activities,
- viii. Summary of key issues raised by stakeholders and how these issues have been addressed or resolved,
- ix. Outstanding issues raised by stakeholders and proposed follow-up actions.

Stakeholder engagement activities and outcomes will be documented and reported regularly in the ESMRs, including a summary of meetings conducted, key topics discussed, and actions taken in response to stakeholder feedback.

Reporting of Grievances

Demand records.

- Monthly by the Contractor/Sub-contractor to the relevant KOSKİ,
- Monthly by the Consultant Firm and the Contractor/Sub-contractor to the relevant KOSKİ and PIU GM Contact Person,
- Monthly PIU GM Contact Person by KOSKİ must be sent. The KOSKİ's GM contact person will submit monthly reports on the GM to the PIU. The contractor GM contact person will submit monthly reports to

the construction consultant firm. The Construction Consultant Firm GM contact person will submit monthly reports to the KOSKİ and PIU.

- Status of GM implementation (procedures, education, public awareness campaigns, budgeting, etc.),
- Numerical data on the number of requests received (applications, suggestions, grievances, requests, positive feedback) and the number of resolved grievances including SEA/SH grievances,
- Qualitative data on type of requests and responses, issues provided and unresolved grievances, Level of satisfaction by action taken (response),
- Any corrective action taken.

The KOSKİ will submit to the PIU a Grievances Record Table as an annex to the GM and the Monthly Reports containing up-to-date information on the following subjects on a monthly basis:

- Status of GM implementation (procedures, education, public awareness campaigns, budgeting, etc.),
- Numerical data on the number of requests received (applications, suggestions, grievances, requests, positive feedback) and the number of resolved grievances,
- Qualitative data on type of requests and responses, issues provided and unresolved grievances, level of satisfaction by action taken (response),
- Any corrective action taken.

The contractor/sub-contractor shall submit an annex to the consultant firm, KOSKİ, a Grievance Record Table and monthly reports containing up-to-date information on the following subjects:

- Status of GM implementation (procedures, education, public awareness campaigns, budgeting, etc.),
- Numerical data on the number of requests received (applications, suggestions, grievances, requests, positive feedback) and the number of resolved grievances,
- Type of grievances and responses, qualitative data on problems provided and unresolved grievances, level of satisfaction by action taken (response),
- Any corrective action taken.

The Consultant Firm will submit an annex to the KOSKİ and PIU a Complaint Record Table and Monthly Reports containing up-to-date information on the following subjects:

- Status of GM implementation (procedures, education, public awareness campaigns, budgeting, etc.),
- Numerical data on the number of requests received (applications, suggestions, grievances, requests, positive feedback) and the number of resolved grievances,
- Type of grievances and responses, qualitative data on problems provided and unresolved grievances, level of satisfaction by action taken (response),
- Any corrective action taken.

Table 7-1 proposes a comprehensive set of indicators related to SEP performance that should be documented in ESMRs. Moreover, the monitoring of the grievances will be performed by means of Grievance Monitoring Table presented in Annex-F: Grievance Tracking-Monitoring Form.

Table 7-1 Key Performance Indicators

Project Phase	Indicator	Method of Verification	Assessment Frequency	Responsible party	Target
Pre-construction	Assigning of KOSKİ PIU team members	Assignment letters of those personnel	Monthly	E&S Consultant Supervision Consultant KOSKİ	Following the appointment period of KOSKİ PIU team members
	Organizing Stakeholder engagement activities to introduce the project documents such as ESMP, SEP, Grievance Mechanism, etc.	Stakeholder engagement documents (notification documentation, attendance sheets, photographs, minutes of meeting, type of stakeholder engagement activities, number and type of participant stakeholders etc.)			At least 2 stakeholder engagement activities conducted during the pre-construction phase At least 20 participants reached through stakeholder engagement activities, disaggregated by gender (female/male) Stakeholder engagement activities to include different stakeholder groups (e.g. local residents, vulnerable groups, institutions, NGOs), with records maintained At least 3 one-on-one meetings conducted with key stakeholders, where required All engagement activities to be documented with attendance lists, meeting minutes and photographic records Baseline for stakeholder engagement activities is considered zero prior to the pre-construction phase.

Project Phase	Indicator	Method of Verification	Assessment Frequency	Responsible party	Target
	Establishing a new Grievance Mechanism for the Project, or making adjustments to the existing Grievance System specific to the Project	Existing Grievance Database (Project-specific) working efficiently			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 timerame will be followed
Land Preparation, Construction and Operation	Gathering and collecting of the grievances, requests, and suggestions (C/R/S)	Grievance Database (project-specific), grievance register	Monthly	E&S Consultant Supervision Consultant KOSKİ	Collection of grievances, requests and suggestions will be tracked and monitored.
	Number and percentage of grievances/requests/suggestions	Grievance Database (project-specific) - Number and percentage of grievances/ requests/suggestions (c/r/s) received and resolved (resolved/received) - Number of unresolved (c/r/s) (with explanation as to why they could not be resolved) and percentage (unresolved/received) - number of (c/r/s) not evaluated (with an explanation of why they were not evaluated) and percentage (not evaluated/received) - Types of grievances - Average Grievance Closeout Time			Number and percentage of grievances/requests/suggestions will be tracked and monitored.

Project Phase	Indicator	Method of Verification	Assessment Frequency	Responsible party	Target
	General subjects which the grievances, requests and suggestions are related to	Grievance Database (project-specific) Percentages of the complaint, request and suggestion subjects (e.g. 15% of the grievances are related to water outage hours, 35% of the requests are related to quick repair of the deteriorated roads, etc.)	Monthly	E&S Consultant Supervision Consultant KOSKİ	General issues related to grievances, requests and suggestions will be followed.
	Raising awareness and conducting informative events within the project scope	Documents (minutes of meetings, photographs, brochures, leaflets, attendance sheets, etc.)			Informative events will be organized to raise awareness within the scope of the project.

7.1 Summary of How SEP Implementation will be Monitored and Reported

It is in the responsibility of the KOSKİ to ensure that the SEP is fully integrated into and implemented in all project activities. It will be ensured that all stakeholders will be consulted and can use the GM during project life. On the other hand, the SEP shall form a part of any tender documentation for physical works within the scope of the Project.

As part of the requirements of WB ESF, the draft SEP is to be publicly disclosed when draft ESMP and draft SEP are cleared for public disclosure and approved by İLBANK and the disclosure will be in the responsibility of the Project Executors and consultant firm, KOSKİ will ensure that SEP is disclosed as hard copy and, on their website, (<https://KOSKI.gov.tr/>). Likewise, several copies of all prepared environmental and social documents will be available locally at the KOSKİ General Directorate Office, places easily accessible to affected groups as Mukhtars offices, local NGOs operated in Konya Province Hüyük District.

Participant data will be recorded for each engagement activity, including disaggregation by gender and stakeholder group where applicable.

The SEP is a dynamic document and will be reviewed, updated, and approved by İLBANK as necessary (e.g., change in the design of the Project components, according to the Environmental and Social Monitoring Reports (ESMRs), requests/grievances of the stakeholders regarding the implementation of SEP, elimination of nonconformities, etc.) throughout the implementation of the Project. For each updated version of the SEP, KOSKİ will be responsible for disclosure through the communication channels.

The PIU and E&S Team will organize monthly and quarterly meetings to collect, register and address the grievances optionally. Ad hoc meetings can be called to address any immediate responses and actions.

The GM will be monitored by the Supervision Consultant that will be selected via tender process to be launched by KOSKİ and approved by İLBANK. The Supervision Consultant will be supervising the PIU Team and it will be responsible to monitor and evaluate the effectiveness of the mechanism whether the system is implemented in line with the principles set out in this SEP.

The PIU team members will be reporting monthly with the Supervision Consultant concerning problems encountered during handling of the grievances. The mechanism will be revised three (3) months after the initial set-up through consultation with the İLBANK, PIU and E&S Team and also complainants whose applications have been closed or still on-going, if necessary.

When İLBANK detects any problems in the implementation of the ESMP and SEP, İLBANK will inform the PIU Team and agree on the steps to be taken to resolve these problems. In particular, in case of any important environmental or social problems, the PIU Team will notify İLBANK in three (3) working days and İLBANK will immediately forward this information to WB.

Monitoring of stakeholder engagement activities will include the number of meetings conducted, dates and locations of meetings, number and type of participants, key issues raised by stakeholders, and how these issues have been addressed or resolved.

7.2 Reporting Back to Stakeholder Groups

PIU Team will register and report the feedback 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 mechanism to İLBANK.

If necessary, KOSKİ will work with a consultant in order to implement social and environmental monitoring activities. The Supervision Consultant will monitor and report to KOSKİ whether the environmental and social issues specified in the SEP and ESMP documents are implemented throughout the life of the subproject.

The PIU Team will provide a statistical and qualitative analysis of feedback and grievances as well as their outcomes on a monthly basis to the Supervision Consultant who will review it and disseminate it to the İLBANK PIU. In addition, the relevant grievances and their actual status will be reported in ESMRs. The reports will only include information regarding the complaint as much as necessary, and any personal information on the individuals having used the GM will remain confidential and will never be shared in these reports.

SEA/SH-related grievances will be reported only in an aggregated and anonymized manner, and no personally identifiable information will be recorded or disclosed, in line with survivor-centered principles.

A summary of the implementation of the stakeholder engagement activities will be provided to the public on a quarterly basis through the official website of the KOSKİ (<https://KOSKI.gov.tr>) to show that the stakeholder engagement activities and processes are being implemented. The summary will be published after removing identifying information on individuals to protect their identities in accordance with the Law on the Protection of Personal Data.



ANNEXES



Annex-A: Grievance Form

	Kireli Wastewater Treatment Plant Construction (KOSKİ) Subproject
	GRIEVANCE FORM
Application No.	
Stakeholder Type: ☐ Project Affected Person (PAP) ☐ Other Interested Party (OIP) ☐ Vulnerable / Disadvantaged Group ☐ Worker ☐ Other: _____	
Name Surname* (Anonymous applications are also accepted. If you wish to submit your application anonymously, please tick below how you would like to be contacted. The feedbacks regarding the measures to be taken for anonymous grievances will be shared publicly, even if they cannot be communicated directly to the person who submitted the complaint.)	
Please indicate how you would like to be contacted (mail, phone, e-mail) Method of Submission: ☐ In person ☐ Phone ☐ E-mail ☐ Website / Online form ☐ Suggestion/complaint box ☐ Anonymous ☐ Other: _____	
Province/District	
Related KOSKİ Name	
Date	

Complaint Category	
1. About the assets/properties/settlements affected by the project	
2. About infrastructure	
3. About the decrease or complete disappearance of income	
4. About environmental issues (ex. Noise, pollution, waste management)	
5. About employment	
6. About traffic, transportation and other risks	
7. Occupational health and Safety	
8. Employee Rights	
9. Other (If confidential, please call Project Implementation Unit (PIU) directly):	
Description of Complaint: What is the problem? When and where did the problem occur? What is the result of the problem?	
What do you expect to happen for the problem to be resolved?	
Date:	Signature:
Note: Although it is not obligatory to give a name and address, it should be noted that there may be some problems in the feedback process regarding the complaint due to lack of information.	

Annex-B: Grievance Database Form

[illegible]

Annex-C: Grievance Closeout Form

GRIEVANCE CLOSING FORM	
Complaint Closing Number:	
Identification of immediate action to be taken:	
Long-term action (if necessary):	
Is compensation necessary?	☐ Yes ☐ No
SOLUTION PROCESS AND CONTROL OF THE DECISION	
Stages of the Resolution Process	End Date and Responsible Institution
1.	
2.	
3.	
4.	
5.	

COMPENSATION AND FINAL STAGES: This part will be filled in and signed by the complainant after she/he receives the compensation fee and her/his complaint is resolved.

Notes:

[Name-Surname and Signature]

Date: ____ / ____ / ____

The complainant:

Representative of the Responsible Institution/Company

[Title-Name-Surname and Signature]



Annex-D: Sample Form for the Key Informant Meetings

CONSULTATION FORM		
Filled by:		Date:
Subject of the Meeting:		Reference No:
1. MEETING INFORMATION		
Name Surname:		Form of Communication
ID Number	Telephone	☐
Phone:	Face to Face	☐
Address:	Website/ E-mail	☐
E-mail:	Other	☐
Stakeholder Group		
PAP ☐	OIP ☐	Vulnerable/Disadvantaged Individual or Group ☐
2. MEETING DETAILS		
Questions about the project:		
Project concerns/feedback:		
Responses to the views expressed above:		

Annex-E: Public Consultation Form

Public Consultation Form	Stakeholder (Name-Surname) (Institution/Position)	Date	Place	Opinions and Suggestions	Signature
1.					
2.					
3.					
4.					
5.					



Annex-F: Grievance Tracking-Monitoring Form

No	Complaint Registration Number	Complaint Receipt Method (Complaint Form, Community Meeting, Telephone)	Complaint Source (Municipality/Operational Level, Site, Document)	Date Complaint Was Received	Place Complaint Was Received	Name of Recipient	Parcel Number (If Related to Land)	Complainant Information					Project Component Related to Complaint	Complaint Category (Land acquisition/asset damage, employment, social impact, etc.)	Summary of Complaint	Complaint Status (e.g. closed, open, pending)	Action Taken				Supporting Documents for Complaint Closure (response letter, signature from complainant, complaint closure protocol)
								Name/Surname	ID Number	Telephone/ e-mail	Village-District	Gender				Responsible Person/Unit	Planned Action	Final Date Complaint Was Handled	Date of Action Taken		
1.																					
2.																					



