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ANTALYA SU VE ATIKSU İDARESİ
GENEL MÜDÜRLÜĞÜ

GREEN AND FUTURE CITIES PROJECT

ASAT5-W3

DÖŞEMEALTI DISTRICT WASTEWATER NETWORK CONSTRUCTION PROJECT

GENERAL DIRECTORATE OF ASAT

STAKEHOLDER ENGAGEMENT PLAN

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Stakeholder Engagement Plan

CONTENTS

LIST OF TABLES	iii
LIST OF FIGURES.....	iv
LIST OF ABBREVIATIONS	v
Executive Summary	1
1.INTRODUCTION/PROJECT DESCRIPTION.....	3
1.1.Objectives of the Sub-Project.....	4
1.2. Components of the Sub-Project	5
1.3.Sub-Project Location.....	7
1.4.Area of Influence.....	9
2.OBJECTIVE/ DESCRIPTION OF SEP	21
3.STAKEHOLDER IDENTIFICATION AND ANALYSIS	21
3.1. Methodology	22
3.2. Project Affected Parties and Other Interested Parties.....	23
3.3. Disadvantaged/Vulnerable Individuals or Groups.....	25
4.STAKEHOLDER ENGAGEMENT PROGRAM	26
4.1. Summary of Stakeholder Engagement Activities Conducted During Project Preparation 26	
4.2. Summary of Subproject Stakeholder Needs and Methods, Tools, and Techniques for Stakeholder Engagement.....	28
4.3. Stakeholder Engagement Plan	30
4.4. Disclosure of Information	35
5.RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES	35
5.1. Project Implementation Unit (PIU).....	35
5.2. Resources	36
5.3. Management Functions and Responsibilities.....	39
6.GRIEVANCE MECHANISM	41
6.1. Grievance Mechanism at National Level.....	42
6.2. Project-Level Grievance Mechanism.....	42

Stakeholder Engagement Plan

6.3. Workers' Grievance Mechanism	48
6.4. Sensitive Grievances	51
7.MONITORING AND REPORTING	53
7.1. Summary of How SEP Implementation Will Be Monitored and Reported.....	53
7.2. Reporting to Stakeholder Groups.....	55
Annexes	56
1. Annex 1 Stakeholder Engagement Meeting (March 13, 2026) Minutes and Visuals	57
2. Annex 2 - Grievance Form	61
3. Annex 3 -Grievance Closure Form	62
4. Annex 4-Grievance Log Form	63
5. Annex 5- Consultation Form	64

Stakeholder Engagement Plan

LIST OF TABLES

Table 1:Table of Nearby Structures within the Area of Influence (AoI) and Their Distances	11
Table 2:Project Stakeholders.....	24
Table 3:Distribution of Vulnerable and Disadvantaged Groups by Neighborhood within the Project Area of Influence	26
Table 4:Summary of Stakeholder Engagement Activities (Preparation Phase).....	27
Table 5:Stakeholder Engagement Plan	31
Table 6 :Stakeholder Engagement Plan Implementation Estimated Budget.....	38
Table 7:Responsibilities	39
Table 8:How the Grievance Mechanism Works	46
Table 9:Functioning of the Workers' Grievance Mechanism	49
Table 10:Reporting Process Requirements and Role Allocation	54

Stakeholder Engagement Plan

LIST OF FIGURES

Figure 1:Döşemealtı District Wastewater Network Project Area Map	8
Figure 2:Bahçeyaka Neighborhood Wastewater Pipeline Project Route and Area of Influence 16	
Figure 3:Yeniköy Neighborhood Wastewater Pipeline Project Route and Area of Influence.	17
Figure 4:Altinkale Neighborhood Wastewater Pipeline Project Route and Area of Influence	18
Figure 5:Yeşilbayır Neighborhood Wastewater Pipeline Project Route and Area of Influence 19	
Figure 6:Yağca Neighborhood Wastewater Pipeline Project Route and Area of Influence	20
Figure 7:Minutes of the Meeting Held on March 13, 2026, Page- 1	57
Figure 8:Minutes of the Meeting Held on March 13, 2026, Page- 2	58
Figure 9:Minutes of the Meeting Held on March 13, 2026, Page- 3	59
Figure 10:Image from the Meeting Held on March 13, 2026	60
Figure 11:Grievance Form	61
Figure 12:Grievance Closure Form.....	62
Figure 13: Consultation Form Page-1	64
Figure 14 Consultation Form Page-2	65
Figure 15:Consultation Form Page-3	66

Stakeholder Engagement Plan

LIST OF ABBREVIATIONS

ALDAS	Infrastructure Management and Consulting Services Industry and Trade Inc.
AOI	Area of Influence
ASAT	Antalya Water and Wastewater Administration General Directorate
ATSO	Antalya Chamber of Commerce and Industry
CIMER	Presidency Communication Center of the Republic of Türkiye
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Report
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
GFC Project	Green and Future Cities Project
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
GRS	World Bank Grievance Redress Service
ILBANK	İller Bank
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PID	Project Information Documents
PAP	Project Affected Parties
PIU	Project Implementation Unit
PMU	Project Management Unit
SCM	Stakeholder Consultation Meeting
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SOP	Series of Projects
SH	Sexual Harassment

Stakeholder Engagement Plan

WB World Bank
YIMER Foreigners Communication Center

Stakeholder Engagement Plan

Executive Summary

Green and Future Cities (GFC) Project (hereinafter referred to as the “Project”) aims to support the development of sustainable and climate-resilient cities across Turkey. Antalya Water and Wastewater Administration (ASAT) (hereinafter referred to as the “Sub-Borrower”) has applied to İller Bankası (İLBANK) for sub-financing under the Döşemealtı District Wastewater Network Construction Project (hereinafter referred to as the “Sub-Project”), which targets the rapidly developing areas of the city. Following an environmental and social screening conducted by İLBANK, the Sub-Project was classified as carrying a moderate level of environmental and social risk.

ALDAŞ A.Ş., acting as the Project Implementation Unit (PIU) on behalf of ASAT, will be responsible for managing all technical, administrative, environmental, social, and occupational health and safety (OHS) processes. ALDAŞ will supervise contractor activities, coordinate project implementation, and ensure the effective application of the Environmental and Social Management Plan (ESMP) and Stakeholder Engagement Plan (SEP) requirements.

The subproject area encompasses the neighborhoods of Yeniköy, Bahçeyaka, Altınkale, Yağca and Yeşilbayır. Due to insufficient existing infrastructure, approximately 200 km of new wastewater pipelines will be constructed. The pipeline design considers hydraulic capacity, topographic conditions, and compatibility with existing infrastructure, with diameters of Ø200 mm, Ø300 mm, Ø400 mm, Ø500 mm, and Ø800 mm. Additionally, one pumping stations will be installed to ensure continuity of wastewater conveyance.

The Sub-Project is planned to be implemented over a 36-month period, with approximately 50 workers employed during the construction phase. A temporary worker camp will be established and managed in accordance with the World Bank’s Labor and Working Conditions (ESS2) Standard and relevant worker accommodation guidelines to ensure safe and adequate living conditions. This arrangement aims to enhance worker comfort, operational efficiency, and social cohesion while complying with occupational health and safety standards.

The Sub-Project aims to strengthen wastewater infrastructure in Döşemealtı District, protect groundwater resources, and improve urban quality of life. The planned infrastructure investments are expected to contribute to the reduction of environmental and public health risks, ecosystem protection, and the enhancement of climate adaptation capacity. Moreover, the Sub-Project is anticipated to support the sustainability of regional economic activities, improve the investment climate, and enhance local government service delivery capacities.

The prepared SEP aims to ensure that stakeholders are informed in a timely, transparent, and inclusive manner, that their views and feedback are collected, and that these inputs are appropriately reflected in project decision-making processes. The plan includes stakeholder analysis, engagement methods, information disclosure and consultation activities, grievance mechanisms, and communication strategies. It also contains monitoring and evaluation

Stakeholder Engagement Plan

mechanisms to assess the effectiveness of engagement activities, as well as sample consultation and grievance forms.

The SEP has been prepared in accordance with World Bank ESS10 – Stakeholder Engagement and Information Disclosure, İLBANK’s Environmental and Social Management System (ESMS), and relevant Turkish legislation. The plan will be updated throughout the Sub-Project lifecycle to support the long-term safety, functionality, and sustainability of the Project. Prepared in coordination with the ESMP, the SEP reflects stakeholder risks and engagement activities in a comprehensive manner.

1. INTRODUCTION/PROJECT DESCRIPTION

The Green and Future Cities (GFC) Project is designed to support the development of sustainable and climate-resilient cities across Türkiye. It focuses on key sectors such as public transportation, water and sanitation, renewable energy, and energy efficiency. Through these investments, the Project aims to improve urban livability, operational efficiency, and overall productivity, while increasing cities' ability to withstand the impacts of climate change.

The Subproject consists of three components;

- **Component 1.** Integrated, multi-sectoral investments in participating municipalities: This component will support demand-driven municipal investments contributing to more livable, productive, and resilient urban development in the participating municipalities. It will finance civil works, goods, consulting and non-consulting services for, inter alia, review and quality assurance of technical designs prepared by municipalities and construction supervision as needed by each municipality. Eligible investments under this component will fall under the following categories:

1. Urban Transport: construction or rehabilitation of resilient mass transit systems (such as tramlines and associated facilities); purchase of public transport vehicles (such as trams, electric and CNG buses); construction of non-motorized transport infrastructure; establishment of digital systems; road safety improvements; establishment of evacuation routes and emergency corridors; improvements for universal accessibility; and integrated greening along transport corridors. Investments will focus on supporting a modal shift towards sustainable mobility modes and improving access to main urban centers and, thus, their markets and employment opportunities.

2. Water and Sanitation: construction and rehabilitation of resilient drinking water, sewage, and stormwater networks, transmission lines, water tanks, pumping stations, and water and wastewater treatment plants; and purchase of goods for related municipal services.

3. Renewable Energy and Energy Efficiency: construction of distributed renewable energy plants from sources such as solar and geothermal; energy efficiency improvements in municipal infrastructure services and onsite energy generation for utilities.

- **Component 2.** Strengthening capacity of İLBANK and municipalities in municipal finance and urban management for future investment projects: The component will support İLBANK and municipalities to build institutional and technical capacity in municipal finance and urban management to prepare integrated municipal infrastructure and financing plans. The component will support a next cohort of municipalities to develop investment plans and sub-project pipelines for future financing, advance creditworthiness, and prepare technical (Project Information Documents (PIDs), technical designs, design reviews), environmental, and social studies for potential sub-projects for the next project under the series of projects (SOP). The component will also explore

Stakeholder Engagement Plan

innovative ways of using available WBG financing instruments with İLBANK, including guarantees and blended financing, and of facilitating access to private capital to support municipalities with a broader package of financing for future municipal infrastructure investments. The component will target municipalities participating under this Project and potentially benefiting under subsequent projects.

- **Component 3.** This component will finance project management and implementation support activities for İLBANK.

1.1. Objectives of the Sub-Project

The objective of the Döşemealtı District Wastewater Network Construction Project is to establish the district's wastewater and stormwater infrastructure in an environmentally, socially, and technically sustainable manner, and to align it with future urban planning standards. In this context, the project aims to achieve the following key objectives: The main objectives targeted under the Subproject are as follows:

1. Expansion of Wastewater Network Infrastructure:

The project aims to increase the capacity of the existing sewerage infrastructure. New pipelines will be designed based on population growth and urban expansion projections, ensuring optimal hydraulic performance through gravity flow and pumping stations in low-lying areas. Additionally, integration of stormwater drainage and separate systems at strategic locations will reduce flood risks and sewer overload during heavy rainfall events. All activities will be carried out in accordance with national technical standards, environmental and social protection measures, and quality control procedures.

2. Environmental Sustainability and Water Quality Management:

In neighborhoods without existing infrastructure, the wastewater generated will be conveyed to the Hurma Wastewater Treatment Plant through a closed system. This will ensure safe treatment of wastewater and controlled discharge into the receiving environment. Real-time water quality measurements will be conducted at treatment plants using SCADA and digital monitoring systems, and leak inspections will be regularly performed along the network. Given the proximity of the region to the Kırkgöz water resources, these measures are critically important for the protection of groundwater and surface water resources.

3. Social and Economic Benefits (Gender and Social Inclusion):

The project aims to protect public health, optimize municipal operational costs, and ensure the long-term sustainability of the infrastructure. From a gender equality and social inclusion perspective, the participation of women, girls, and vulnerable groups in planning, monitoring, and service delivery processes will be encouraged. Safe and accessible sewerage infrastructure will particularly enable women and girls to access toilet and hygiene services securely, support girls' school attendance, and reduce domestic workload. Children will have access to healthier

Stakeholder Engagement Plan

streets and play areas, reducing the risk of waterborne diseases. Community awareness and participation activities will ensure that the infrastructure is inclusive, safe, and user-friendly.

4. Future-Oriented Planning:

The infrastructure will be designed in line with demographic and urban development projections, and management and maintenance processes will be modernized through smart infrastructure technologies. This will provide the system with the flexibility and resilience to meet both current and future demands.

The project aims to transform Döşemealtı District's wastewater management into a modern, efficient, and environmentally sustainable system, contributing to the vision of Green and Future Cities.

1.2. Components of the Sub-Project

The Döşemealtı District Wastewater Network Construction Subproject is an urban infrastructure investment aimed at strengthening and modernizing the existing wastewater management infrastructure in Döşemealtı District, Antalya Province. The Subproject involves the construction of new sewerage lines and pumping stations, the expansion of the existing wastewater collection system, and the safe conveyance of collected wastewater to a treatment facility. By fully integrating Döşemealtı into the district's wastewater management system, the Subproject will contribute to the reduction of environmental and public health risks.

The Subproject activities cover the Yeniköy, Bahçeyaka, Altinkale, Yağca, and Yeşilbayır neighborhoods within Döşemealtı District. Due to the permeable geological structure of the area, Döşemealtı is sensitive in terms of groundwater reserves and falls within the Kırkgöz Water Source catchment, one of Antalya's key drinking water resources. Currently, a significant portion of domestic wastewater in the region is stored in technically inadequate septic systems, which pose potential environmental and public health risks due to leakage and overflow.

To mitigate these risks, the Subproject will establish a new wastewater collection infrastructure, and the collected wastewater will be conveyed to the Hurma Wastewater Treatment Plant (WWTP) via the existing main collector line for advanced biological treatment. This will ensure that wastewater is treated in accordance with environmental regulations and discharged into receiving waters in a controlled manner.

Under the Stakeholder Engagement Plan (SEP), the key components of the Subproject to be communicated and consulted on are summarized as follows:

- **Construction of Wastewater Collection Network:** Approximately 200 km of new sewerage lines will be constructed across Döşemealtı District. These lines will expand the capacity of the existing wastewater collection system, ensuring the safe collection of domestic wastewaters in the area.

Stakeholder Engagement Plan

- **Technical Specifications of Sewerage Lines:** The network will be designed considering hydraulic capacity requirements and topographical conditions. HDPE corrugated pipes and concrete/reinforced concrete pipes with diameters ranging from Ø200 mm to Ø800 mm will be used. The design will take into account the existing settlement patterns as well as projected population growth.
- **Establishment of Pumping Stations:** In areas where gravity-based wastewater conveyance is not feasible, one wastewater pumping stations will be constructed to maintain system continuity. The pumping stations will be equipped with pumps, energy infrastructure, and automation systems to ensure safe and uninterrupted operation.
- **Decommissioning of Existing Septic Systems:** Technically inadequate septic systems currently in use will be gradually decommissioned, and all domestic wastewater will be connected to the closed sewer network. This measure will contribute to reducing the risk of groundwater contamination.
- **Conveyance of Wastewater to Treatment Plant:** Collected wastewater will be conveyed continuously via the existing main collector line to the Hurma WWTP, where it will undergo advanced biological treatment in compliance with environmental regulations.
- **Modern Infrastructure for Operational Efficiency:** Modern equipment and monitoring technologies will be integrated into the newly established infrastructure. These applications will facilitate system performance monitoring and improve the efficiency of maintenance and operational processes.

Construction activities under the Subproject will primarily take place within existing road corridors and public areas. The Subproject does not include the construction of a new wastewater treatment plant; it is a network expansion investment aimed at extending existing infrastructure and directing wastewater to the most suitable treatment facility in the region.

Under the SEP, local residents, relevant institutions, and other stakeholders will be regularly informed and consulted during the planning, construction, and operational phases of the Subproject.

Stakeholder Engagement Plan

1.3. Sub-Project Location

Döşemealtı District is located in the northern part of Antalya Province and has recently become a significant residential area due to its rapidly growing population, expanding settlements, and new housing developments. Its proximity to Antalya city center and integration with the existing transport infrastructure give Döşemealtı considerable potential for sustainable urban development.

The Döşemealtı District Wastewater Network Construction Project has been planned to ensure environmental sustainability, protect public health, and improve the quality of life in neighborhoods where existing wastewater infrastructure is insufficient. Under the Project, domestic wastewater generated in the area will be safely and continuously collected and conveyed to the Hurma Wastewater Treatment Plant via the existing main collector line. This approach will contribute significantly to the protection of groundwater resources and the prevention of uncontrolled wastewater discharges.

The Project area covers the Yeniköy, Bahçeyaka, Altınkale, Yağca and Yeşilbayır neighborhoods. Due to insufficient existing infrastructure, approximately 200 km of new sewerage lines are planned. The design of the sewerage network has been developed based on hydraulic capacity, topographic conditions, and compatibility with existing infrastructure, with pipe diameters of Ø200 mm, Ø300 mm, Ø400 mm, Ø500 mm, and Ø800 mm. In addition, one new pumping stations will be established in the area.

The Project routes have been planned along existing cadastral roads and infrastructure corridors, without intervening on privately owned lands, and without requiring permanent land use in agricultural or residential areas. Therefore, no land acquisition or expropriation is anticipated under the Project. Route planning has minimized potential conflicts with existing infrastructure and reduced the impact of construction activities on settlements, traffic, and daily life to a minimum.

This planning approach aims to reduce environmental impacts, ensure infrastructure continuity, and support sustainable urban development in Döşemealtı District. Stakeholders within the Project area, including local residents, neighborhood administrations (muhtarlık), and relevant public authorities, will be informed and consulted throughout the planning and implementation phases.

The Project routes and coverage area are shown in **Figure 1**

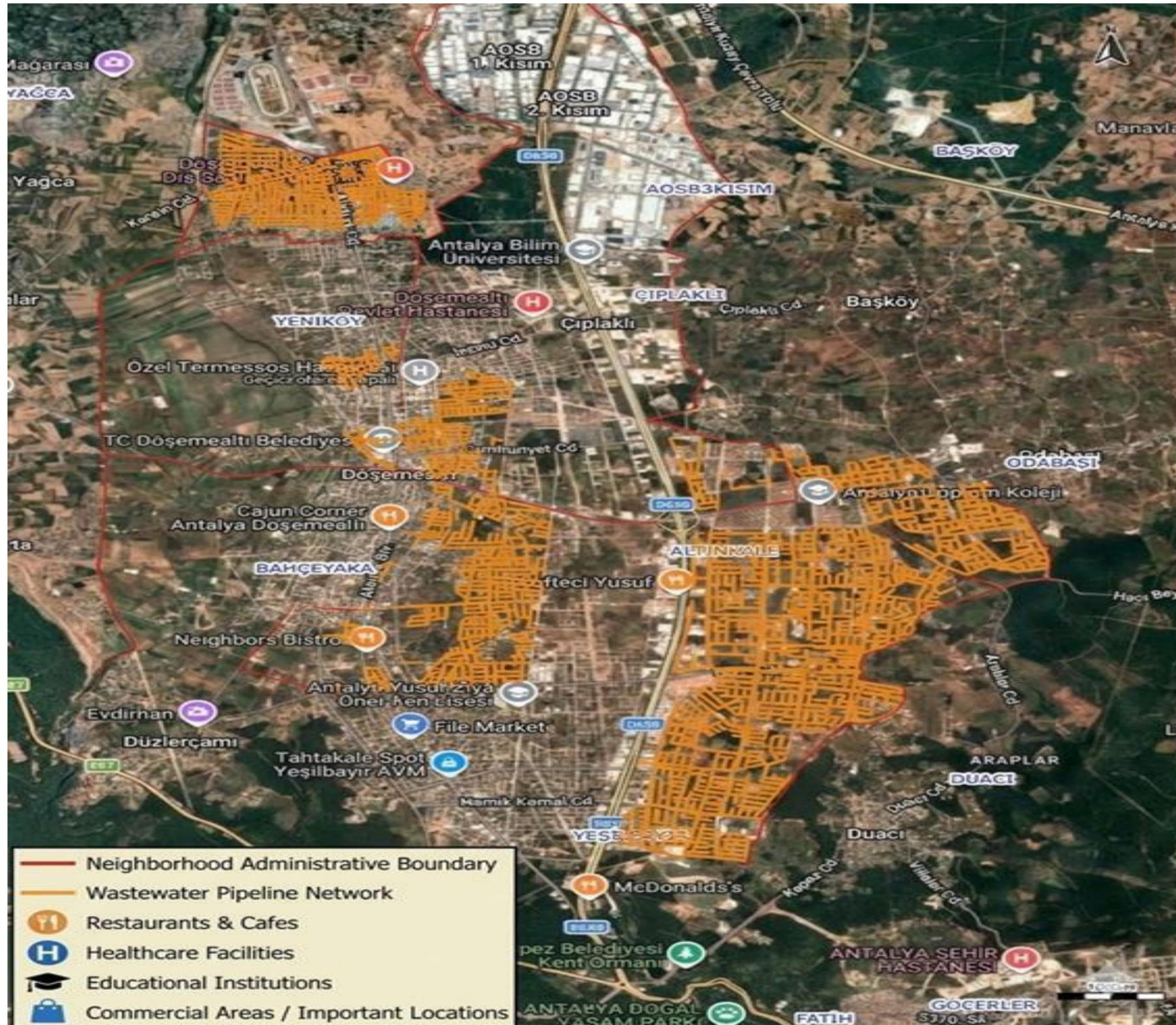


Figure 1: Döşemealtı District Wastewater Network Project Area Map

Stakeholder Engagement Plan

1.4. Area of Influence

Within the scope of the ASAT5/W3 Döşemealtı District Wastewater Network Construction Sub-Project, the Area of Influence (AoI) has been defined by considering the spatial extent of potential environmental and social impacts arising from project activities. In defining the AoI, the approximately 200 km wastewater network routes to be constructed, the locations of planned pumping stations, and the areas where construction activities will take place have been taken into account. In addition, the potential propagation of impacts such as excavation works, construction noise, machinery and material transportation, temporary traffic arrangements, and temporary access restrictions during the construction phase has also been considered.

When determining the AoI, existing land uses, residential areas, and social use areas in the surrounding environment were evaluated, and neighborhoods with potential for direct or indirect impacts from project activities were identified. Within this scope, the neighborhoods of Altinkale, Yeşilbayır, Yeniköy, Yağca and Bahçeyaka in Döşemealtı District have been included within the sub-project AoI. The AoI has been assessed under the headings of direct impact area, indirect impact area, and social impact area. These evaluations were carried out in accordance with the Environmental and Social Standards of the World Bank and the İLBANK's Environmental and Social Management System.

1. Direct Area of Influence

The direct project area covers the routes of the sewerage network where infrastructure works will be carried out, as well as the locations where pumping stations will be constructed. The sewerage pipes will largely be laid along existing cadastral roads and infrastructure corridors, and excavation, pipe-laying, and backfilling works will be undertaken within these areas.

Within the direct impact area, various sensitive receptors are present, including religious buildings, educational institutions, commercial establishments, sports facilities, accommodation facilities, healthcare facilities, and public use areas.

In Altinkale Neighborhood, sensitive receptors located in close proximity to the project route include commercial establishments (e.g., Adıbey Catering, A101, Domino's Restaurant), religious buildings (e.g., Çukurcaaltı Mosque, Hacı Osman Mosque), educational institutions (e.g., Şehit Metin Darbaş Middle School, private education and rehabilitation center), accommodation facilities, and sports facilities (e.g., Akdeniz Akademi Swimming Pool).

In Yeşilbayır Neighborhood, facilities within the direct impact area include industrial facilities (e.g., M. Paşa Municipality Asphalt Plant), sports facilities (e.g., Padel Park Arena), educational institutions (e.g., Döşemealtı Şehit Volkan Canöz High School, Private Antalya Education and Rehabilitation Center), and commercial/industrial establishments (e.g., File Market, Antalya Tachograph, Atakman Mercedes Service).

Stakeholder Engagement Plan

In Yeniköy Neighborhood, sensitive receptors include religious buildings (e.g., İbrahim Bilgin Mosque), educational institutions (e.g., Dilek Recep Özer Middle School, Döşemealtı Vocational and Technical Anatolian High School), commercial establishments (e.g., BİM market, Antalya Sofrası Catering), accommodation facilities (e.g., Yavuz Selim Student Dormitories), sports facilities (e.g., Döşemealtı Sports Hall), public use areas (e.g., Masal Park), and healthcare facilities (e.g., Döşemealtı Oral and Dental Health Clinic located approximately 100 meters from the project route).

In Yağca Neighborhood, sensitive receptors in close proximity to the project route include commercial establishments (e.g., A101 market, Özkaya Market), public use areas (e.g., covered market area), educational institutions (e.g., Nursel Ayhan Kadam Primary School), and religious buildings (e.g., Yağca Mosque).

In Bahçeyaka Neighborhood, educational institutions (e.g., Saime Salih Konca Kindergarten) and commercial establishments (e.g., Solo Center) are located near the project route. A detailed list of these sensitive receptors and their potential impact types is provided in **Table 1**. In addition, **Figure 2, Figure 3, Figure 4, Figure 5 and Figure 6**, present maps of the Project's Area of Influence (AoI).

2. Indirect Area of Influence

The indirect area of influence covers areas surrounding the project site that may be affected indirectly by construction activities. Short-term impacts such as noise, equipment and material transportation, temporary traffic arrangements, and temporary access restrictions may be experienced in these areas during the construction phase.

Sensitive receptors located at a certain distance from the project route may experience limited indirect impacts. For example, the Döşemealtı Oral and Dental Health Clinic in Yeniköy Neighborhood is located approximately 100 meters from the project route and is therefore considered within the indirect impact area. These impacts are expected to be localized, temporary, and manageable. Where necessary, traffic management plans will be implemented during construction activities to ensure pedestrian and vehicle safety and to maintain uninterrupted traffic flow.

3. Social Area of Influence

The social area of influence includes socially sensitive receptors such as educational institutions, healthcare facilities, commercial establishments, places of worship, sports facilities, and public use areas located along or near the project route. Short-term impacts such as noise, construction equipment movement, or temporary access arrangements may occur in these areas during project activities.

Within the project AoI, facilities such as schools, mosques, markets, restaurants, sports areas, commercial establishments, and public gathering areas have been evaluated under this category. These locations include educational institutions, healthcare services, sports facilities,

Stakeholder Engagement Plan

commercial establishments, and social areas such as Masal Park and covered market areas. Detailed information on these sensitive receptors, including their locations and potential impact types, is presented in **Table 1**. Under the Stakeholder Engagement Plan, users of these facilities and relevant institutions will be informed about project activities, and communication channels along with a grievance mechanism will be established to enable them to provide feedback and raise concerns.

Table 1:Table of Nearby Structures within the Area of Influence (AoI) and Their Distances

No	Neighborhood	Location Name	Type	Distance to Project Area (m)	Potential Impact Type
1	Altinkale	Adibey Catering	Commercial Establishment	3	Noise, Dust, Access Restriction
2	Altinkale	Çukurcaaltı Mosque	Mosque	3	Noise, Traffic
3	Altinkale	Private Education and Rehabilitation Center	Health / Social Service	3	Noise, Access Restriction
4	Altinkale	Hacı Osman Mosque	Mosque	3	Noise, Traffic
5	Altinkale	Şehit Metin Darbaş Middle School	Educational Institution	3	Noise, Traffic
6	Altinkale	Akdeniz Akademi Swim Pool	Social Facility	3	Noise, Traffic
7	Altinkale	A 101	Commercial Establishment	3	Noise, Traffic
8	Altinkale	Dominos Restaurant	Commercial Establishment	3	Noise, Traffic

Stakeholder Engagement Plan

9	Yeşilbayır	A101	Commercial Establishment	3	Noise, Traffic
10	Yeşilbayır	M. Paşa Municipality Asphalt Plant	Industrial Facility	3	Noise
11	Yeşilbayır	Padel Park Arena	Sports Facility	3	Noise, Traffic
12	Yeşilbayır	Döşemealtı Şehit Volkan Canöz High School	Educational Institution	3	Noise, Traffic
13	Yeşilbayır	Private Antalya Education and Rehabilitation Center	Health / Social Service	3	Noise, Access Restriction
14	Yeşilbayır	File Market	Commercial Establishment	3	Traffic, Access Restriction
15	Yeşilbayır	Antalya Tachograph	Commercial Establishment	3	Noise
16	Yeşilbayır	Atakman Mercedes Service	Commercial Establishment	3	Noise
17	Yeniköy	Döşemealtı Oral and Dental Health Clinic	Health Facility	100	Noise (limited)
18	Yeniköy	İbrahim Bilgin Mosque	Mosque	3	Noise, Traffic
19	Yeniköy	Dilek Recep Özer Middle School	Educational Institution	3	Noise, Traffic

Stakeholder Engagement Plan

20	Yeniköy	Döşemealtı Vocational Technical Anatolian High School	Educational Institution	3	Noise, Traffic
21	Yeniköy	BİM	Commercial Establishment	3	Traffic, Access Restriction
22	Yeniköy	Antalya Sofrası Catreing	Commercial Establishment	3	Traffic, Access Restriction
23	Yeniköy	Yavuz Selim student halls of residence	Educational Institution	3	Noise, Traffic
24	Yeniköy	Döşemealtı Sports hall	Sports Facility	3	Noise, Traffic
25	Yeniköy	Masal Park	Social Area	3	Noise, Traffic
26	Yağca	A101	Commercial Establishment	3	Traffic, Access Restriction
27	Yağca	Covered Market	Public Area	3	Noise, Traffic
28	Yağca	Nursel Ayhan Kadam Primary School	Educational Institution	3	Noise, Traffic
29	Yağca	Yağca Mosque	Mosque	3	Noise, Traffic

Stakeholder Engagement Plan

30	Yağca	Özkaya Market	Commercial Establishment	3	Traffic, Access Restriction
31	Bahçeyaka	Saime Salih Konca Kindergarten	Educational Institution	54	Noise
32	Bahçeyaka	Solo Center	Commercial Establishment	3	Noise, Access Restriction

Stakeholder Engagement Plan

4. Cumulative Impacts and Positive Impacts

The Sub-Project is an infrastructure investment aimed at expanding the existing wastewater infrastructure in Döşemealtı District and integrating local settlements into a comprehensive wastewater management system. Project activities primarily consist of excavation and pipe-laying works conducted within existing road corridors. Therefore, it is not expected that project activities will create significant cumulative negative impacts in combination with other ongoing commercial, social, or infrastructure activities in the area.

Since the project mainly involves linear infrastructure works, potential impacts are expected to be localized, short-term, and temporary. Noise, traffic movement, and machinery activities during construction will be controlled through appropriate planning and management measures. Upon completion of the project, domestic wastewater generated in the area will be safely collected and conveyed to the Hurma Wastewater Treatment Plant, thereby preventing uncontrolled discharges. This is expected to have a positive effect, particularly in terms of protecting groundwater resources and improving environmental quality.

5. Use and Updating of the AoI

The defined Area of Influence (AoI) will serve as a key reference for planning environmental and social management activities and stakeholder engagement processes under the project. The AoI definition is considered an important tool for monitoring environmental and social impacts, identifying stakeholders, conducting information activities, and managing potential risks.

During project implementation, technical revisions to the wastewater network routes, changes in pumping station locations, or updates in the scope of construction activities may require the AoI to be reviewed and updated. In such cases, the AoI will be reassessed, and stakeholder engagement activities will be revised accordingly.

The review and update process for the AoI will be carried out in line with the World Bank Environmental and Social Standards and the environmental and social management requirements implemented by İLBANK, and relevant stakeholders will be informed as necessary. This approach aims to ensure effective management of environmental and social impacts and continuity of stakeholder engagement throughout the project.

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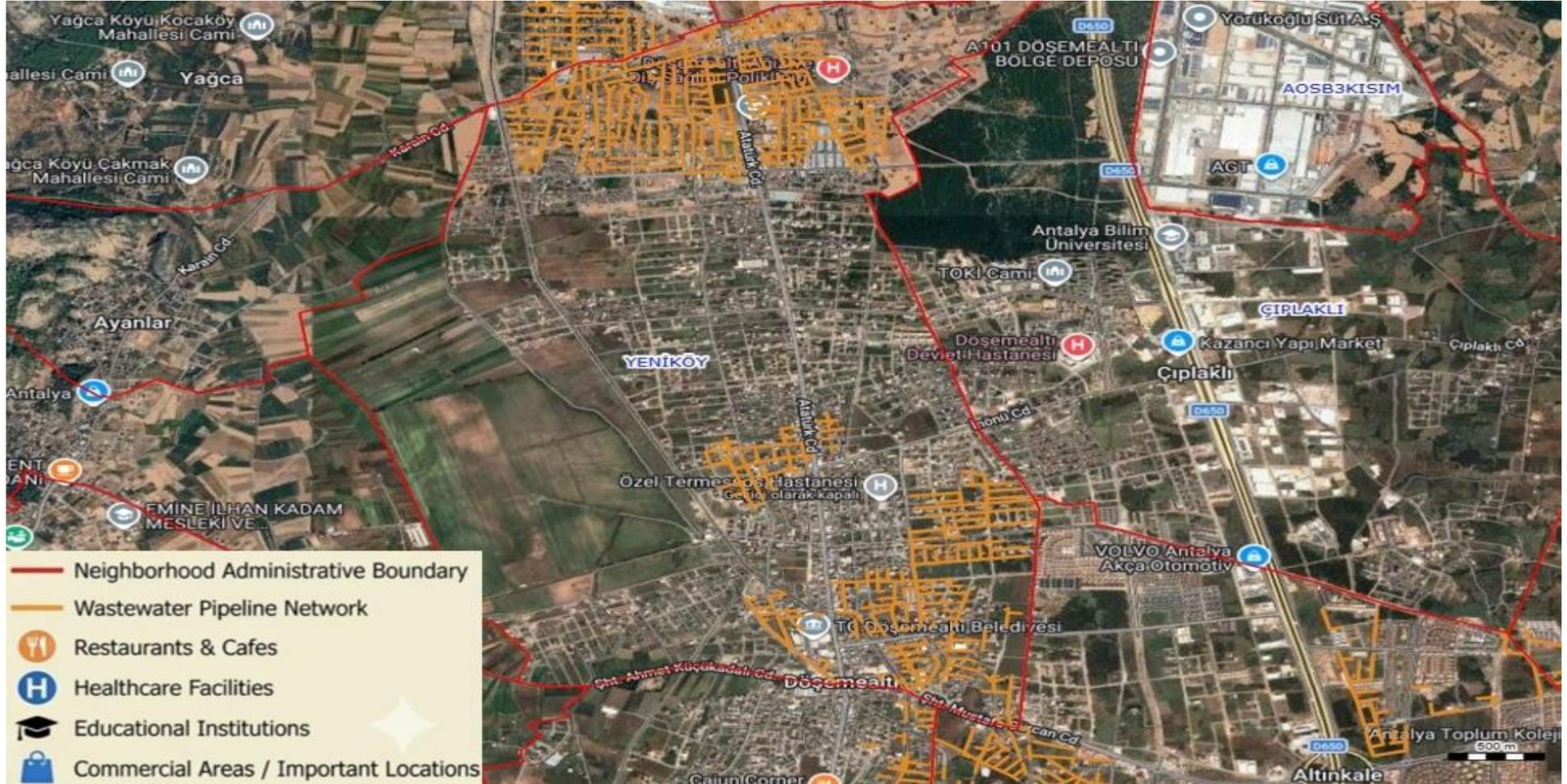


Figure 3:Yeniköy Neighborhood Wastewater Pipeline Project Route and Area of Influence

Stakeholder Engagement Plan

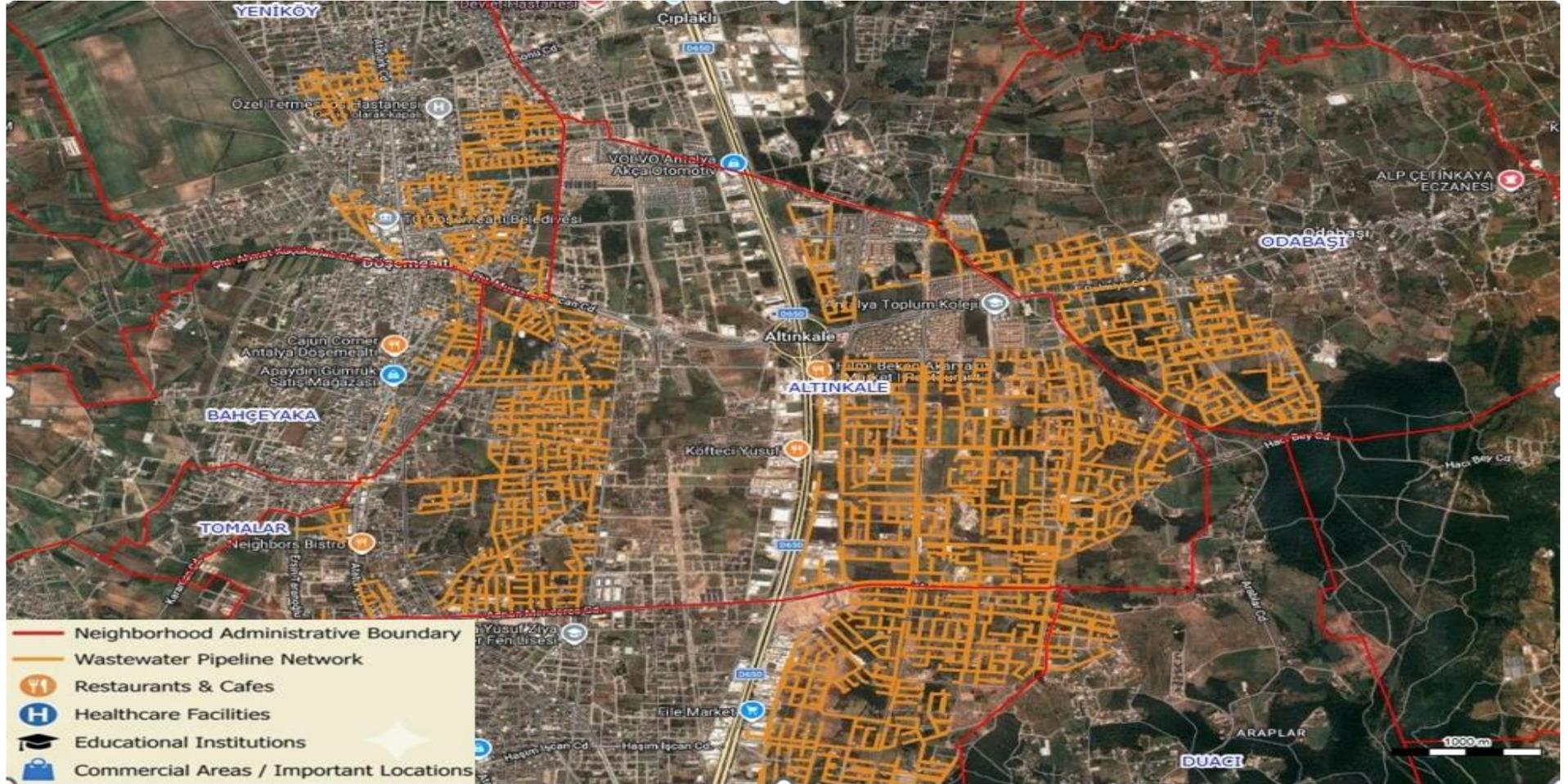


Figure 4: Altınkale Neighborhood Wastewater Pipeline Project Route and Area of Influence

Stakeholder Engagement Plan

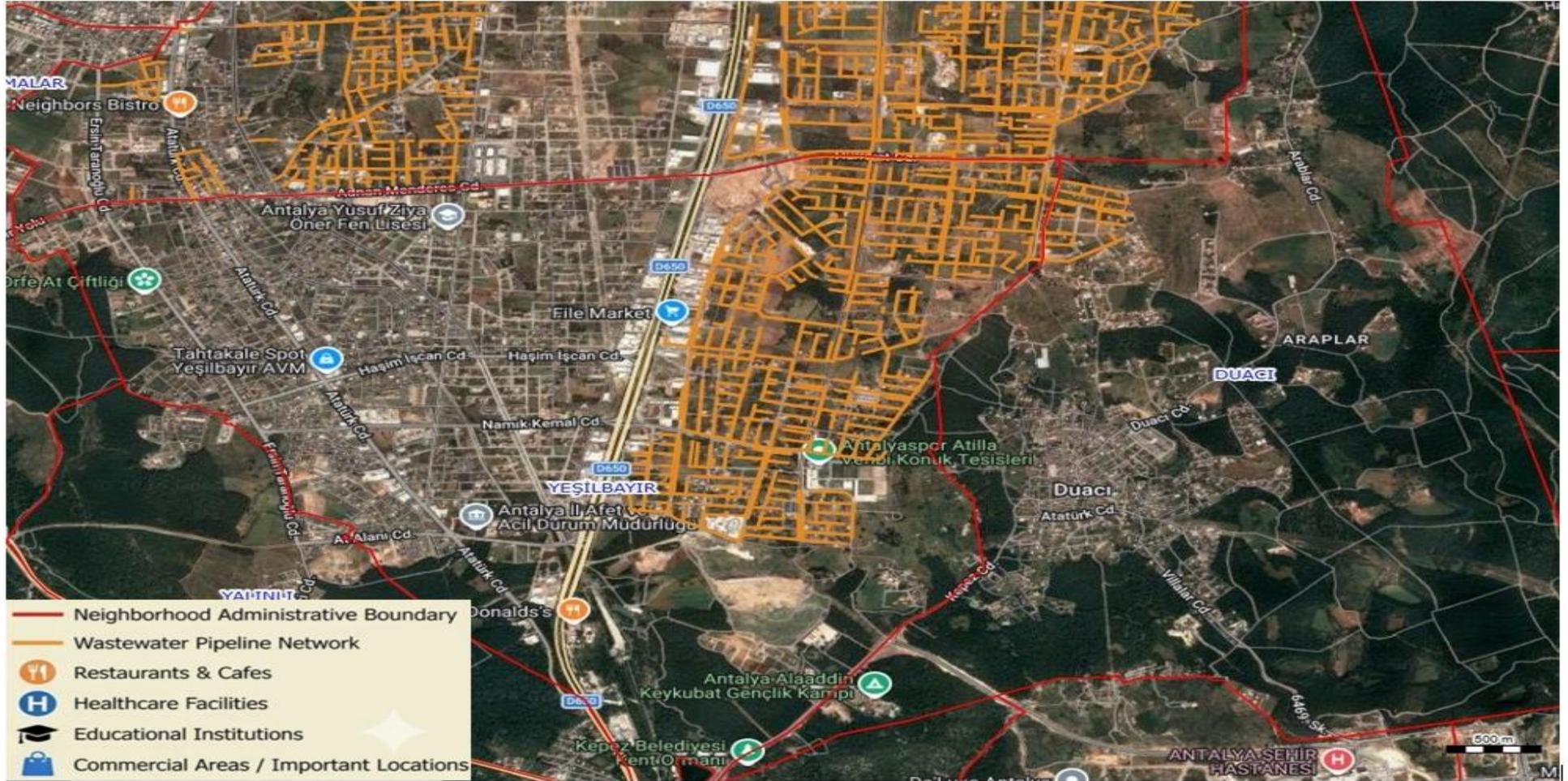


Figure 5: Yeşilbayır Neighborhood Wastewater Pipeline Project Route and Area of Influence

Stakeholder Engagement Plan

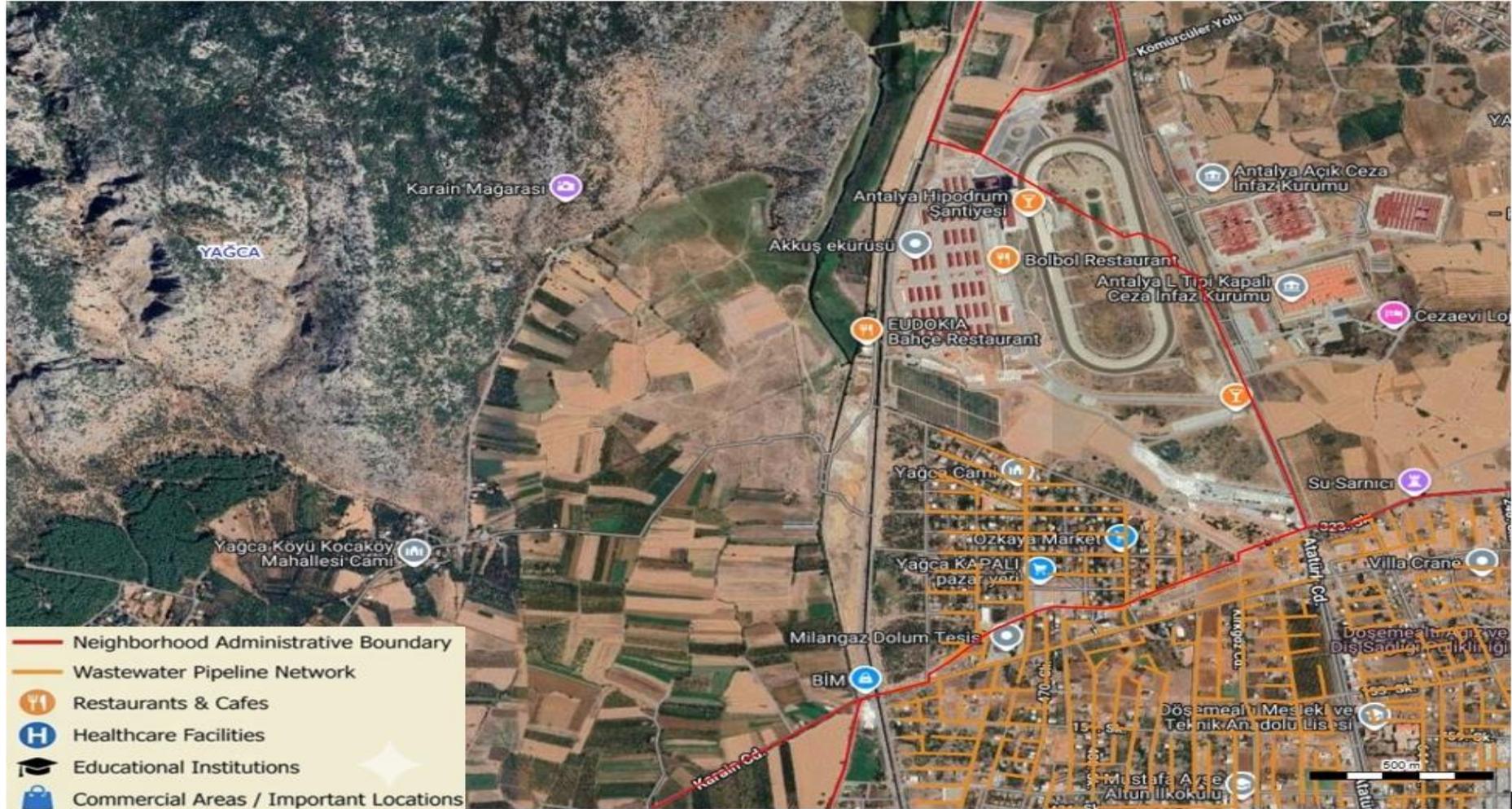


Figure 6: Yağca Neighborhood Wastewater Pipeline Project Route and Area of Influence

Stakeholder Engagement Plan

2. OBJECTIVE/ DESCRIPTION OF SEP

The Stakeholder Engagement Plan (SEP) has been prepared to ensure that affected people and other stakeholders are provided with appropriate, timely, and accessible information, enabling them to express their views and concerns regarding the project and its impacts.

The objectives of the Stakeholder Engagement Plan can be summarized as follows:

- Identification of stakeholders who are directly or indirectly affected by the project and those who have an interest in the project,
- Planning and organizing stakeholder engagement activities that will start during project preparation and continue throughout project implementation,
- Ensuring that relevant project information regarding environmental and social risks and impacts is shared with stakeholders in a timely, understandable, accessible, and appropriate manner and format,
- Establishing a Grievance Mechanism that provides affected stakeholders with accessible and inclusive channels to raise issues and grievances, allowing timely response and management of such grievances throughout all stages of the project.

Stakeholder engagement plays a critical role in the successful completion of projects with a broad stakeholder base, including local communities, women's groups, refugees, vulnerable groups, multiple municipal organizations, and local and international civil society organizations.

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. The SEP has been developed in line with the requirements of ESS10(Stakeholder Engagement and Information Disclosure), the Environmental and Social Management System (ESMS) of ILBANK 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

The stakeholder analysis was conducted within the scope of the Sub-Project to identify individuals, institutions and communities that will be affected by project activities. The analysis provides a basis for the effective management of the project's social and environmental impacts and the timely, transparent and inclusive involvement of stakeholders in the project processes. This process was carried out in accordance with the requirements of the World Bank ESS10 and İLBANK Environmental and Social Management System (ESMS).

Stakeholder Engagement Plan

3.1. Methodology

To meet international good practice requirements, the stakeholder engagement process for the Project will be implemented in accordance with the following principles:

- **Openness and life-cycle approach:** Stakeholder engagement activities will be carried out throughout the entire Project life cycle in a transparent manner. The engagement process will be conducted openly and will not involve any external manipulation, interference, coercion, or intimidation.
- **Informed participation and feedback:** Relevant information about the Project will be provided to stakeholders in appropriate and accessible formats and disseminated through suitable communication channels. Opportunities will be created for stakeholders to express their views, concerns, and suggestions. Feedback received will be reviewed and considered during Project implementation.
- **Inclusiveness and sensitivity:** Stakeholder identification activities will aim to ensure the participation of all groups that may be directly or indirectly affected by the Project. Equal access to information will be ensured for all stakeholders, and engagement methods will be designed in consideration of stakeholder needs. Particular attention will be given to vulnerable groups such as women, the elderly, persons with disabilities, individuals with chronic illnesses, low-income households, and foreign nationals who may face barriers to participation.
- **Flexibility:** Where face-to-face engagement is limited due to social conditions, cultural context, or governance factors, alternative engagement methods such as online meetings, telephone communication, or other digital platforms will be used to ensure effective stakeholder participation.

For the subproject, stakeholder identification was carried out using a combination of desktop reviews and field studies. During the desktop studies, project route plans, existing planning documents, and local administrative data were analyzed in detail, and the potential area of influence and relevant stakeholders were preliminarily assessed.

The project area of influence was defined by considering the sewerage pipeline route and including settlements that could be directly or indirectly affected by construction activities. Within this framework, the neighborhoods of Yeniköy, Bahçeyaka, Yeşilbayır, Altınkale, and Yağca were included in the project area of influence, and stakeholder identification activities were conducted based on these settlements.

The ALDAŞ Project Implementation Unit (PIU) conducted field visits along the Subproject route and surrounding neighborhoods and carried out on-site observations. Additionally, a stakeholder meeting was held on 13 March 2026 with the Döşemealtı Neighborhood Headmen Association, attended by nine participants in total. The meeting included the headmen (muhtars) from Yeniköy, Bahçeyaka, Yeşilbayır, and Yağca neighborhoods. During the meeting, preliminary assessments were made regarding local expectations, potential social impacts, and

Stakeholder Engagement Plan

vulnerable groups, and stakeholder feedback was systematically collected. Minutes and photos from the meeting are provided in **Annex 1 Stakeholder Engagement Meeting (March 13, 2026) Minutes and Visuals**

This mixed-methods approach allowed for the comprehensive identification of individuals, groups, and institutions potentially affected by the Project, providing essential information to guide the stakeholder engagement process.

3.2. Project Affected Parties and Other Interested Parties

In this section, stakeholders are categorized into two main groups in line with the ESS10 (Stakeholder Engagement and Information Disclosure): Project Affected Parties (PAPs) and Other Interested Parties (OIPs).

Project Affected Parties refer to individuals or groups who may be directly or indirectly affected by the project and may face actual or potential risks to their physical environment, health and safety, cultural practices, well-being, livelihoods, or living conditions as a result of project activities. These stakeholders may include local communities as well as other individuals or vulnerable groups.

Other Interested Parties refer to individuals, groups, or organizations that may not be directly affected by the project but have an interest in the project due to its location, characteristics, potential environmental and social impacts, or matters of public concern. These may include regulatory institutions, government authorities, private sector representatives, trade unions, civil society organizations, and cultural groups.

Stakeholder Engagement Plan

Table 2: Project Stakeholders

Stakeholder Category	Stakeholder Group	Relevance to the project
• PAP	• Workers	Directly engaged in construction activities and therefore exposed to occupational health and safety risks, working condition impacts, workplace accidents, and labor rights issues. They are the primary beneficiaries of the Labor Management Procedures, OHS measures, and the worker grievance mechanism.
• OIP	• Municipalities (Antalya Metropolitan Municipality, Döşemealti Municipality)	As the local authority, coordinates permitting, licenses, infrastructure connections, traffic arrangements, and municipal services, and ensures the project's compliance with local plans and regulations.
• PAP	• People Living in the Project Area	May be directly affected during construction and operation phases by environmental and social impacts such as noise, dust, vibration, traffic congestion, restricted access, and temporary service interruptions. Therefore, they constitute the main target group for information disclosure and consultations.
• PAP	• Tourism Business Owners • Local Businesses	May experience temporary economic impacts due to construction-related disturbances such as access restrictions, traffic congestion, dust, and noise, which may lead to reduced customer numbers, operational disruptions, and income losses. They will be regularly informed and consulted to minimize adverse economic impacts.
• OIP	• Other Public Institutions (Mediterranean Electricity Distribution Inc. (AEDAŞ) – CK Mediterranean Electricity (Electricity Retail Services), Enerya Antalya Gas Distribution Inc. Türk Telekom Inc.) – Provincial Directorate of Ministry of Environment, Urbanization and Climate Change - General Directorate of State Hydraulic Works (DSİ)	Responsible for providing legal permits, technical opinions, and regulatory oversight to ensure compliance with national legislation and institutional requirements.
• OIP	• Special Administrations Mediterranean Electricity Distribution Inc. (AEDAŞ) – CK Mediterranean Electricity (Electricity Retail Services), Enerya Antalya Gas Distribution Inc. Türk	Coordination is required to protect, relocate, or integrate existing utility infrastructure and to prevent service interruptions or damage during construction works.

Stakeholder Engagement Plan

	Telekom Inc.	
• OIP	<ul style="list-style-type: none"> Professional Chambers Antalya Chamber of Commerce and Industry (ATSO) Civil Society Organizations (Chamber of Civil Engineers (İMO), Chamber of Environmental Engineers (ÇMO), Chamber of Electrical Engineers (EMO), Antalya City Council)	Represent professional and community interests; provide technical input, feedback, and support transparency and stakeholder engagement throughout the project.

3.3. Disadvantaged/Vulnerable Individuals or Groups

In line with the requirements of the World Bank Environmental and Social Standards (ESS10 – Stakeholder Engagement and Information Disclosure) and the İLBANK Environmental and Social Management System (ESMS), disadvantaged and vulnerable individuals and groups have been specifically identified within the scope of the Project, and measures have been planned to ensure their effective inclusion in the stakeholder engagement process. This approach aims to identify groups that may be disproportionately affected by project activities and to ensure their equal access to information, participation, and feedback mechanisms.

Within this context, disadvantaged or vulnerable groups within the Project’s area of influence are defined as children, elderly individuals, persons with disabilities, individuals with chronic illnesses, low-income households, female-headed households, and foreign nationals or refugee populations. During project activities to be carried out in the neighborhoods of Yeniköy, Bahçeyaka, Altinkale, Yeşilbayır and Yağca in Döşemealtı District, Antalya Province, these groups may be limitedly affected by short-term noise, construction machinery movement, or temporary access arrangements along the wastewater pipeline route.

Based on desk-based data analysis, consultations with local neighborhood headmen (muhtars), and field observations, the presence of vulnerable groups within the Project’s area of influence has been assessed. Accordingly, general information regarding the presence and scale of disadvantaged groups was collected through field visits and consultation activities conducted in the relevant neighborhoods.

Neighborhood-level numerical data on the number of children, elderly individuals, persons with disabilities, households receiving social assistance, and foreign nationals/refugees within the Project’s area of influence are summarized in **Table 3**. These data will provide a basis for planning targeted information activities, accessibility measures, and social risk mitigation actions throughout the Project implementation period.

Stakeholder Engagement Plan

Within the scope of the Stakeholder Engagement Plan, disadvantaged and vulnerable groups will be informed about the Project in a timely and accessible manner, and appropriate communication channels will be provided to enable them to convey their views and feedback. This approach aims to strengthen social inclusion and minimize potential adverse social impacts during the Project implementation phase.

Table 3: Distribution of Vulnerable and Disadvantaged Groups by Neighborhood within the Project Area of Influence

Neighborhood	Total Population	Children (0–18)	65+ Elderly	Persons with Disabilities	Receiving Social Assistance	Foreign Nationals / Refugees
YENİKÖY	24.696	6.191	1752	112	30	1253
BAHÇEYAKA	14.000	4.022	1195	50	35	500
ALTINKALE	9365	3027	644	40	42	53
YEŞİLBAYIR	18.500	2000	800	30	40	100
YAĞCA	1495	450	300	4	4	-

4. STAKEHOLDER ENGAGEMENT PROGRAM

The Stakeholder Engagement Plan aims to define a program for stakeholder engagement, including public information disclosure and consultation throughout the project cycle, in line with the WB ESS10 and İLBANK ESMS. To ensure effective and meaningful participation from different stakeholder groups, the Project will utilize various appropriate communication and information methods during the pre-construction, construction, and operation phases.

4.1. Summary of Stakeholder Engagement Activities Conducted During Project Preparation

During the preparation phase of the sub-project, various activities were carried out to ensure early, transparent, and meaningful stakeholder engagement in line with the World Bank Environmental and Social Standards (ESS10) and the İLBANK Environmental and Social Management System (ESMS) principles. The main objective of these activities was to inform local communities about the Project, collect their views and suggestions, and integrate the obtained information into the project planning process.

Within this scope, the neighborhoods of Yeniköy, Bahçeyaka, Yeşilbayır, Altinkale, and Yağca were evaluated as part of the Project's area of influence, and stakeholder identification activities were conducted based on these settlements. The ALDAŞ Project Implementation Unit (PIU) conducted field visits and on-site observations along the sub-project route and in the

Stakeholder Engagement Plan

surrounding neighborhoods. These field activities provided critical information for identifying potential social impacts and vulnerable groups.

As part of the project preparation process, a stakeholder meeting was held on March 13, 2026, with a total of six participants from the Döşemealtı Muhtars Association. The meeting was attended by the muhtars of Yeniköy, Bahçeyaka, Altinkale, Yeşilbayır, and Yağca neighborhoods. During the meeting, participants were informed about the overall scope of the sub-project and planned activities, and preliminary assessments regarding social impacts and vulnerable/disadvantaged groups were shared. Additionally, stakeholders were briefed on the communication and grievance mechanisms through which they could provide feedback throughout the project implementation.

During the meeting, local expectations, potential risks, and observations related to vulnerable groups were recorded, and suggestions were received regarding the establishment of a continuous communication mechanism with the muhtars to ensure regular information sharing and feedback during the implementation period. These activities ensured that stakeholders were engaged in the Project at an early stage, that their views and suggestions were integrated into the planning process, and that continuous participation would be maintained throughout the sub-project implementation.

Meeting minutes and visual documentation are provided in **Annex 1 Stakeholder Engagement Meeting (March 13, 2026) Minutes and Visuals**, and **Table 4** Hata! Başvuru kaynağı bulunamadı. summarizes the main stakeholder engagement activities carried out during the preparation of the Stakeholder Engagement Plan (SEP)

Table 4:Summary of Stakeholder Engagement Activities (Preparation Phase)

Stakeholder Group	Representative	Date	Location	Scope
Mukhtars	The muhtars of the Yeniköy, Bahçeyaka, Tomalar, Altinkale, Yeşilbayır, Yağca and neighbourhoods	13.03.2026	Döşemealtı Muhtars Association	Providing information on the scope of the sub-project, sharing details of temporary access and environmental impacts, and gathering data on local expectations and vulnerable groups

Stakeholder Engagement Plan

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

Within the scope of the Subproject, in order to ensure effective and continuous engagement with stakeholders; to inform stakeholders, receive their views and feedback, and appropriately address their complaints and requests, the stakeholder engagement methods, tools, and techniques listed below will be used during the project preparation and implementation phases:

- a) **Communication (Telephone and email):** Telephone and e-mail communication will be used to inform stakeholders about project requirements, activities, and potential impacts; to receive information and data requests related to project implementation; and to integrate requests and complaints received from stakeholders into the Grievance Mechanism process.
- b) **Digital Communication Tools:** Digital communication tools will be used for sharing non-technical project information, announcing updates on project progress, notifying the project implementation schedule, and sharing monthly progress reports.
- c) **Brochures/Flyers** Brochures and leaflets will be prepared to share the project implementation schedule and site-specific project information. At least 10 days prior to the commencement of works, leaflets containing the layout of the work site, start and targeted completion dates, and contact information of authorized personnel to be reached in case of emergencies will be printed and distributed to the relevant neighborhood headmen (muhtarlık offices) and vehicle users in the area.
- d) **Grievance Mechanism:** An accessible and transparent Grievance Mechanism will be implemented to receive, assess, and resolve all types of requests, suggestions, complaints, and information requests submitted by project stakeholders.
- e) **Structured Agendas:** Structured agendas and meeting summaries will be used during meetings and events held with relevant stakeholders to ensure that discussions are conducted in a purposeful and efficient manner.
- f) **Focus Group Meetings/Discussions:** Sharing information on a specific topic with a specific group, including vulnerable groups; gathering comments, feedback, opinions, and perceptions about the project from a specific group; collecting grievances and concerns about the project from a specific group; monitoring the environmental and social risks and impacts of project activities on a specific stakeholder group; establishing relationships with specific groups.
- g) **Consultation Meetings:** Consultation meetings will be held with broad stakeholder groups, primarily affected communities, to share information on the Project's scope, timeline, and sub-project activities (particularly non-technical information), to obtain stakeholder comments and feedback, to collect project-related complaints and concerns, and to establish sustainable engagement with affected communities.

Stakeholder Engagement Plan

- h) Official Meetings:** Where necessary, official consultation meetings will be organized with relevant public institutions and organizations regarding the project scope and implementation process.
- i) One-on-One Meetings:** Individual meetings will be conducted to collect information and allow stakeholders to more comfortably express their views and concerns, particularly on sensitive issues.

Site Visits: Construction sites and project activities will be regularly visited and monitored by the Project Implementation Unit (PIU). Through these visits, environmental and social impacts will be monitored, risks will be identified, and necessary mitigation measures will be implemented. The first Stakeholder Consultation Meeting (SCM) of the subproject will be held following the approved of ESMP report in a selected venue in Antalya 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 ASAT's and ALDAŞ official website. Subproject information brochures will be distributed 15 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 them about the meeting and the project.

In addition to official announcements, local participation will be encouraged by the Social Expert of ASAT through direct engagement with community leaders. To ensure the inclusion of vulnerable groups such as seasonal migrants and refugees, local leaders will be consulted in the field. 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 subproject 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 ASAT.

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

- The sub-project's purpose and scope,
- The sub-project's lead implementing agency, project beneficiary, implementing organization, and funders,
- The sub-project's expected benefits,

Stakeholder Engagement Plan

- Environmental and social impacts: The sub-project's anticipated environmental and social impacts, along with proposed measures to mitigate them (participants will be invited to discuss potential additional impacts and provide feedback on the adequacy of the planned measures),
- Grievance mechanism,
- Discussion (Q&A) 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

4.3. Stakeholder Engagement Plan

Stakeholder engagement activities will be identified and planned, starting during the project preparation phase and continuing through the construction and operation phases.

Table 5: Stakeholder Engagement Plan

Project Phase	Purpose of Consultation / Message to be Conveyed	List of Information/Documents to be Disclosed	The method used	Target Stakeholder	Estimated Time	Responsible Party
Pre-construction	<ul style="list-style-type: none"> Groups affected by the project should be informed about the scope and necessity of the project. Information will be provided on measures to mitigate the environmental and social impacts of the project, information on the grievance's mechanism, a non-technical project summary, and presentations. Within the scope of the project, necessary permits and procedures to be obtained from the relevant administrations and institutions for the implementation of the project. Informing stakeholders about project progress, environmental impacts and mitigation measures, potential restrictions on access to services, and gathering 	<ul style="list-style-type: none"> Draft ESMP and SEP documents and other related subproject documents 	<ul style="list-style-type: none"> Stakeholder Consultation Meeting (interpreter available if needed for those who do not speak Turkish, sign language for the hearing impaired, etc.) 	<ul style="list-style-type: none"> Parties Affected by the Project: Disadvantaged/Vulnerable individuals or groups Other interested parties 	<ul style="list-style-type: none"> Before the project activities begin 	<ul style="list-style-type: none"> ASAT General Directorate ALDAŞ A.Ş Contractor Company

	feedback from stakeholders.					
Construction	<ul style="list-style-type: none"> • Planning and scheduling of road construction activities. • Stakeholders and those affected by the Project should be provided with relevant technical details (e.g., access roads for safe passage, types, number and frequency of vehicles to be used during construction, etc.). • Grievance Mechanism 	<ul style="list-style-type: none"> • ESMP • SEP • Traffic Management Plan • Grievance Mechanism 	<ul style="list-style-type: none"> • Regular or optional face-to-face meetings with Mukhtar(s) in their offices or in Public places. • Grievance Mechanism • Announcements on ASAT and ALDAŞ A.Ş.'s website • Mobile technologies such as phone calls, SMS, corporate websites, etc. • Project Brochures • Presentations • Public Announcements 	<ul style="list-style-type: none"> • Local people • Businesses 	<ul style="list-style-type: none"> • Every 6 months and as needed (e.g., when a grievance is received, when there are changes in the project design/implementation/timeline, etc.) 	<ul style="list-style-type: none"> • ASAT General Directorate • ALDAŞ A.Ş • Contractor Company

<p>Construction</p>	<ul style="list-style-type: none"> • Information on managing the environmental and social risks of the project: • Environmental and social monitoring program and its results. • General information about the progress of the project. • Emergency Preparedness and Response Plan (EPRP) at the sub-project level. 	<ul style="list-style-type: none"> • ESMP • SEP • Grievance Mechanism • Emergency Preparedness and Response Plan 	<ul style="list-style-type: none"> • face-to-face meetings • Stakeholder Consultation Meeting • Inc. • Grievance Mechanism • Announcements on ASAT and ALDAŞ A.Ş.'s website • Mobile technologies such as phone calls, SMS, corporate websites, etc. • Project Brochures • Presentations • Public Announcements 	<ul style="list-style-type: none"> • Local People • Businesses • Village heads 	<ul style="list-style-type: none"> • Every 6 months and as needed (e.g., when a grievance is received, when there are changes in the project design/implementation/timeline, etc.) 	<ul style="list-style-type: none"> • ASAT General Directorate • ALDAŞ A.Ş • Contractor Company
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Green and Future Cities Project
 Döşemealtı District Wastewater Network Construction Project
 Stakeholder Engagement Plan



<p>Operation</p>	<ul style="list-style-type: none"> Grievance Mechanisms 	<ul style="list-style-type: none"> GM procedure 	<ul style="list-style-type: none"> Stakeholder consultation meetings Digital communication tools/social media Grievance Mechanism Announcements on ASAT and ALDAŞ A.Ş.'s official website. Brochures Presentations Public announcements 	<ul style="list-style-type: none"> Project Affected Groups and Other Interested Parties Disadvantaged/vulnerable individuals or groups 	<ul style="list-style-type: none"> After the completion of sub-project activities 	<ul style="list-style-type: none"> ASAT General Directorate
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Stakeholder Engagement Plan

4.4. Disclosure of Information

The subproject documents, including the Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP) will be disclosed in both Turkish and English through the existing websites of ASAT and ALDAŞ. Subproject posters and information related to the grievance mechanism will be distributed at local points within the district, including the neighborhood head's office (muhtarlık), schools, mosques, and local tea houses.

Brochures approved by İLBANK will include information about the Subproject, the grievance mechanism, and relevant contact details. In addition, updates regarding the Subproject—such as construction activities and key environmental and social (E&S) information—will be published on the ASAT website.

ASAT will ensure that its website is regularly updated and maintained throughout the implementation of the Subproject.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

Within the framework of the Sub-Project, ALDAŞ A.Ş. has been assigned as the Project Implementation Unit (PIU) on behalf of ASAT General Directorate. Qualified and experienced personnel have been appointed within the PIU to ensure effective management, monitoring, and reporting of environmental and social risks and impacts associated with the Sub-Project.

The PIU organization consists of a Project Manager, Environmental and Social (E&S) Team, Occupational Health and Safety (OHS) Specialists, and site engineers working within the construction and technical offices.

The environmental, social, and OHS experts assigned to the Sub-Project within ALDAŞ PIU are as follows. During the implementation of the project, personnel changes may occur due to administrative or operational requirements; in such cases, personnel with equivalent qualifications and experience will be appointed, and any changes will be reported to İLBANK.

- **Environmental Specialists (Environmental Engineers):** Derya ÜNVER (deryaunver@aldas.com.tr), Melda ÇAKIR YILDIZ (melda@aldas.com.tr)
- **Social Specialist / Grievance Mechanism Focal Point:** Ümmühan Gizem ŞİMŞEK (gizemsimsek@aldas.com.tr)
- **Occupational Health and Safety (OHS) Specialist:** Fatma KESKİN (Class C) (keskin@aldas.com.tr); additionally, a Class A OHS Specialist will be provided through

Stakeholder Engagement Plan

external consultancy services.

Environmental Specialists: Environmental Specialists are responsible for the management and monitoring of environmental risks and impacts that may arise from all construction and rehabilitation activities in accordance with the Environmental and Social Management Plan (ESMP), relevant sub-plans, and applicable national legislation. Within this scope, they oversee the implementation of environmental mitigation measures at the site, supervise contractor activities, and conduct monitoring activities related to air quality, noise, dust, waste management, and the protection of water resources. They also ensure that corrective and preventive actions are implemented in response to identified non-compliances and report the monitoring results and findings to İLBANK.

The Social Specialist / Grievance Mechanism Focal Point The Social Specialist, who also serves as the Grievance Mechanism Focal Point, is responsible for the planning, implementation, and monitoring of stakeholder engagement activities defined under the Stakeholder Engagement Plan (SEP). The Social Specialist ensures that stakeholders are informed in a timely manner through appropriate communication channels, coordinates consultation and information meetings, and facilitates the integration of stakeholder feedback into the project implementation process.

In addition, the Social Specialist is responsible for the effective operation of the Grievance Mechanism, including the registration, assessment, monitoring, and resolution of grievances. The Social Specialist also supports the management of social risks related to labor and working conditions and interactions with third parties and reports relevant activities and outcomes to İLBANK.

Occupational Health and Safety (OHS) Occupational Health and Safety (OHS) Specialists are responsible for the identification, monitoring, and control of occupational health and safety risks associated with construction and rehabilitation activities. In this context, they oversee the implementation of required preventive measures at the site in accordance with applicable national legislation, the World Bank Group Environmental, Health, and Safety (EHS) Guidelines, and the provisions of the ESMP.

OHS Specialists conduct regular site inspections, monitor occupational accidents and near-miss incidents, evaluate the effectiveness of emergency preparedness and response procedures, and ensure the regular reporting of OHS performance findings.

5.2. Resources

ASAT will be responsible for implementing the activities related to the Stakeholder Engagement Plan (SEP). In this context, the ASAT will carry out all communication and information activities aimed at providing stakeholders with clear, consistent, timely, and understandable information, and will allocate the necessary human resources, technical capacity, and financial resources.

Stakeholder Engagement Plan

All communication and information materials prepared under the project will be available in Turkish and English. If required, particularly for engagement with vulnerable or sensitive groups, the ASAT and ALDAŞ will provide translation services for other languages.

Prior to the commencement of any project activity, the ASAT and ALDAŞ will organize Public Participation Meetings and other appropriate consultation activities to ensure that all stakeholders who are or may be affected by the project are informed, understand the process, and have an opportunity to provide feedback. These activities will be conducted in accordance with World Bank Environmental and Social Standard 10 (ESS10) and İLBANK ESMS.

As part of the implementation of the Stakeholder Engagement Plan, all costs related to the following activities will be borne by the ASAT and ALDAŞ:

- Organizing stakeholder information and consultation meetings (venue, logistics, announcements, etc.),
- Preparation and distribution of printed and digital information materials,
- Conducting digital communication activities,
- Establishing, operating, and maintaining records of the Grievances Mechanism.
- Providing interpreting and accessibility services when needed.

ALDAŞ A.Ş., in its capacity as Project Implementation Unit (PIU), is responsible for monitoring and supervising the implementation, effectiveness, and compliance of all Stakeholder Engagement (SEP) activities carried out by ASAT. ALDAŞ PIU will monitor the compliance of stakeholder engagement activities with the Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP), national legislation, İLBANK ESMS, and the policies and procedures defined under the World Bank ESS10 ; and will submit the necessary reports to İLBANK in this regard.

Table 6 :Stakeholder Engagement Plan Implementation Estimated Budget

Item	Responsibility	Estimated Cost (EURO)	Implementation Stage
Grievance Mechanism	General Directorate of ASAT Contractor	30.000 €/year	During the construction period (36 months)
ESMP Implementation Team Environmental Specialist Social Specialist OHS Specialists	General Directorate of ASAT Contractor	144.000 €/year	During the construction period (36 months)
Occupational Health and Safety	General Directorate of ASAT Contractor	36.000 €/year	During the construction period (36 months)
Public Exposure to Health Problems	General Directorate of ASAT Contractor	20,000 €/year	During the construction period (36 months)
Information meeting, information brochures, all kinds of information	General Directorate of ASAT Contractor	2.500 €/year	During the construction period (36 months)
Training and Capacity Development	General Directorate of ASAT Contractor	3.000 €/year	During the construction period (36 months)

Stakeholder Engagement Plan

5.3. Management Functions and Responsibilities

The ASAT General Directorate, as the Sub-borrower, bears the overall responsibility for the implementation of SEP. ALDAŞ Inc., acting on behalf of ASAT as the Project Implementation Unit (PIU), is responsible for ensuring the effective implementation, monitoring, and reporting of environmental and social (E&S) requirements under the Subproject. The Supervision/Consultancy team will oversee the activities of contractors on-site and monitor the implementation of the ESMP, the Stakeholder Engagement Plan (SEP), and other E&S requirements.

Contractors are responsible for implementing the provisions of the SEP within the scope of their contractual obligations. ALDAŞ Inc. (PIU) will require contractors to appoint, as part of their key personnel, at least one Environmental Specialist, one Social Specialist, and one Class A Occupational Health and Safety (OHS) Specialist. These personnel will be required to work full-time on the project site throughout the construction and rehabilitation phases of the Subproject.

The key personnel assigned by the contractor will be responsible for the effective on-site implementation of the ESMP, SEP, the Grievance Mechanism, and other relevant E&S and OHS requirements, and will perform their duties under the supervision and oversight of the ALDAŞ Inc. Project Implementation Unit (PIU).

The monthly and quarterly Environmental and Social Monitoring Reports (ESMRs) prepared by the contractor, together with Public and Worker Grievance/Feedback Records, will be regularly monitored, consolidated, and reported by PIU/ALDAŞ. These reports and records will be reviewed in accordance with the environmental and social monitoring and reporting requirements of İLBANK and submitted to İLBANK for the relevant reporting periods.

Table 7: Responsibilities

Responsible Entity	Terms of Reference
Antalya Water and Wastewater Administration (ASAT) General Directorate (Sub-Borrower)	<ul style="list-style-type: none">-Throughout the entire term of the sub-financing agreement, the contractor assumes ultimate responsibility for the performance of the Sub-Project environmental and social (E&S), including the contractors' performance, to the satisfaction of İLBANK.- It appoints ALDAŞ A.Ş. as the Project Implementation Unit (PIU) on behalf of ASAT and provides the necessary authorizations.- The Stakeholder Engagement Plan (SEP) and other E&S tools requested by İLBANK are prepared, updated, and implemented in accordance with the schedules agreed upon with İLBANK; the necessary financial and human resources are allocated.- Subborrower will provide training to the contractor before the construction works on the implementation of the elements specified in

Stakeholder Engagement Plan

Responsible Entity	Terms of Reference
	<p>the ESMP and SEP, and to the personnel, who will work during the operation period before the operation.</p> <ul style="list-style-type: none"> - It cooperates with İLBANK to include the Environmental and Social Action Plan (ESAP) and other E&S commitments in the sub-financing agreement. - Ensures that İLBANK's Environmental, Health, Safety and Social (EHSS/EHSS) requirements are reflected in the contractor's tender and contract documents. - It exercises the authority to halt activities that pose an urgent and serious risk to health, safety, or the environment. - It allocates the necessary resources for reviewing the Environmental and Social Monitoring Reports (ESMRs) to be submitted by contractor on a monthly basis. - It facilitates monitoring visits and audits to be carried out by İLBANK and its consultants.
<p>ALDAŞ Infrastructure Management and Consulting Services Industry and Trade Inc. (PIU/ (Supervisor/Consultant)</p>	<ul style="list-style-type: none"> -The Supervision Contract Manager will be responsible for inspecting the contractor to ensure that the recommendations and requirements given in the Project disclosure package are fulfilled. They will be responsible for continuously monitoring processes and actions undertaken by the contractor and for identifying the measures to be taken by the contractor to deal with any areas of non-conformity. At the same time, they check whether the necessary training is given to the personnel who will work during the construction phase. This includes periodic audits, inspections and/or on-site checks of project areas or worksites and/or records and reports compiled by contractor. -The Social/Human Resources Expert will be responsible for supervising the implementation of community health and safety and social measures provided in the Project disclosure package, as well as the implementation of SEP, and for reporting to the Project Owner regularly. Manages the Grievance Mechanism (GM) and regularly monitors the reporting of grievances to the Project Owner. It follows the penalties arising from the contract, checks the suitability of the work done by the Contractor, gives warnings and directions, and notifies Project Owner in a timely manner if necessary. Participates in stakeholder engagement activities. The expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). The expert is responsible for regularly reporting to the Project Owner. -The supervision consultant will also ensure that the Contractor's SEP and GM-related duties are properly implemented, and necessary records (e.g., grievance logs, engagement records) are maintained and reported in line with the ESMP/SEP requirements.

Stakeholder Engagement Plan

Responsible Entity	Terms of Reference
Contractors	<p>-The contractor will assign its own E&S team, including at least one Social Expert, to ensure on-site implementation and monitoring of SEP requirements. This team will work in close coordination with the PIU experts and report regularly on stakeholder engagement and grievance management. The contractor will submit monthly Environmental and Social Monitoring Reports (ESMRs) to the Project Owner in accordance with SEP requirements.</p> <p>-In case of any serious stakeholder-related issues, including grievances or incidents related to Gender-Based Violence (GBV), the Contractor will immediately inform the Project Owner.</p> <p>-The Contractor is also responsible for maintaining and submitting records related to stakeholder engagement, such as grievance logs and meeting records, in line with the SEP requirements. .</p>

6. GRIEVANCE MECHANISM

The purpose of this mechanism is to consider, address, evaluate, and resolve all grievances, concerns, expectations, opinions, suggestions, and rights of all stakeholders, primarily the immediate communities and project staff, regarding project activities. The mechanism is designed to ensure that grievances are handled effectively, transparently, and fairly, to expedite resolution processes, and to minimize potential negative impacts.

The basic principles of the grievance mechanism are as follows:

- 1. Transparency:** All stakeholders will be informed about the functioning of the grievance mechanism and the resolution processes; the evaluation process and results of applications will be clearly shared.
- 2. Confidentiality:** Applicants' personal information will be kept confidential and accessible only to authorized personnel. All grievances will be recorded and resolved securely and confidentially.
- 3. Accessibility:** The grievances mechanism will be accessible to all stakeholders through various communication channels (in-person application, telephone, email, online form, etc.).
- 4. Timeliness and Effectiveness:** Grievances will be classified according to their priority and importance, answered within reasonable timeframes, and proposed solutions will be implemented.
- 5. Independence:** The mechanism will operate impartially, with decision-making processes reviewed by independent evaluators and relevant project stakeholders.
- 6. Compliance:** The mechanism will be designed and implemented in accordance with World Bank Environmental and Social Standards (ESS) and İLBANK procedures.

This mechanism will increase trust and participation in project implementation processes, and potential social and environmental risks will be managed more quickly and effectively.

6.1. Grievance Mechanism at National Level

The national-level grievances mechanism is a centralized structure that enables project stakeholders and citizens to submit grievances, suggestions, and feedback through official channels. This mechanism is designed in accordance with both Turkish legislation and international standards, ensuring that grievances are handled securely, transparently, and effectively. In Türkiye, the two most widely used central platforms for this purpose are the Turkish Presidency Communication Center (CİMER) and the Foreigners Communication Center (YİMER), both offering various communication channels for citizens and foreigners to easily submit their grievances.

➤ TURKISH REPUBLIC PRESIDENCY COMMUNICATION CENTER (CİMER)

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).

- Official CİMER Website: <https://www.cimer.gov.tr/>
- Contact Line: ALO150 and 0312 590 20 00
- Address: Directorate of Communications Kızılırmak neighbourhood Mevlana Bulvarı No:144 Çankaya/ANKARA, Türkiye

➤ FOREIGNERS COMMUNICATION CENTER (YİMER)

A centralized grievances system is also provided for foreigners. It offers a centralized complaint system. 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 Official Website: <https://yimer.gov.tr/>
- E-Mail: yimer@goc.gov.tr
- Contact Line: 0312 157 11 22
- Address: Çamlıca Neighborhood, 122nd Street No: 4, Yenimahalle/ANKARA, Türkiye

6.2. Project-Level Grievance Mechanism

Within the scope of the project, separate and accessible grievance mechanisms will be established at the project level to effectively manage worker grievances and grievances and feedback from the local population (citizens). These mechanisms aim to ensure that grievances are received, evaluated, and resolved in a timely, fair, transparent, and confidential manner.

In order to effectively manage grievances, the project implementation process will address grievances at four key levels:

- 1) **Contractor Level:** The Contractor awarded the construction works will be responsible for receiving, recording, and, if possible, resolving any concerns or

Stakeholder Engagement Plan

complaints raised by stakeholders (such as public building management, building users, visitors, host communities or beneficiaries, project workers, etc.) arising from construction works under this Sub-Project. The Contractor will also establish a grievance mechanism for its workforce prior to commencement of works. If the Contractor cannot resolve a grievance, it must forward it to the relevant person/institution. Contractors will provide weekly reports to ALDAŞ A.Ş. containing records of resolved and unresolved concerns and grievances. Sample grievance forms provided in **Annex 2 - Grievance Form** , **Annex 3 -Grievance Closure Form** will be made available to Contractors for recording applications (grievances, requests, suggestions, etc.).

- 2) **Construction Supervision Level:** Concerns and grievances that cannot be resolved at the Contractor level, as well as complaints submitted through ASAT and ALDAŞ existing channels, will be forwarded to the supervision engineers on the construction site. Supervision engineers will share these grievances with the ALDAŞ Social Expert and the Contractor Social Expert to ensure they are recorded and assessed. Supervision engineers and the ALDAŞ Social Expert will review the process in coordination with the Construction Supervision/Project Manager; if necessary, they will issue a situation report reminding the Contractor of environmental and social obligations and ensure corrective actions are taken. If grievances remain unresolved at this stage, the matter will be escalated to ASAT senior management for review.

➤ **ASAT GENERAL DIRECTORATE**

- ASAT General Directorate Official Website:https://www.asat.gov.tr/tr/e_istek.html
- E-mail:info@asat.gov.tr
- Contact Line: ALO 185 and Whatsapp Reporting Line: 0530 676 67 67
- Address: Fabrikalar Neighborhood, Dumlupınar Blvd. No:5, ANTALYA, Turkey

➤ **ALDAŞ A.Ş. GENERAL DIRECTORATE**

- ALDAŞ A.Ş. Official Website:<http://www.aldas.com.tr/>
- Contact Line: 0242 259 32 16
- E-mail:info@aldas.om.tr
- Address: Gülveren Neighborhood, 3760 Street No:15/1, 07220 Kepez/ANTALYA, Turkey
- ALDAŞ Inc. Supervisory Organization (Applications submitted via grievance forms through supervisory engineers working at construction sites)

- 3) **Municipality/Sub-Debtor Level** (Antalya Metropolitan Municipality, ASAT General Directorate)

➤ **ANTALYA METROPOLITAN MUNICIPALITY**

Stakeholder Engagement Plan

- Official Website of Antalya Metropolitan Municipality:<https://www.antalya.bel.tr/Iletisim>
- E-mail:info@antalya.bel.tr
- Contact Line:0242 249 50 00
- Address:Yüksekalan Neighborhood, Adnan Menderes Boulevard No:20, 07310 Muratpaşa/ANTALYA

4) Project Management Unit Level (İLBANK and World Bank): Concerns and grievances that cannot be resolved through the grievance redress mechanisms established at the project level and within site implementation processes shall be reviewed by the financing institution, İller Bankası A.Ş. (İLBANK). In addition, project-affected communities and individuals may also submit their grievances directly to İLBANK. İLBANK shall review all grievances received from the site/project level or through direct applications, carry out the necessary assessments, and ensure the implementation of appropriate corrective and preventive measures. Where deemed necessary, grievances reviewed by İLBANK may be forwarded to the World Bank. Furthermore, project-affected communities and individuals may submit their grievances directly to the World Bank's corporate grievance mechanisms without applying to İLBANK. The World Bank shall assess the grievances submitted to it in accordance with its own policies and procedures.

Grievances may be submitted through the İLBANK and World Bank grievance channels listed below, and these mechanisms do not restrict the applicants' rights to seek judicial remedies or pursue other administrative remedies under national legislation.

İLLER BANKASI A.Ş.

- İLBANK Official Grievances
Website:<https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- E-mail:uidbbilgi@ilbank.gov.tr
- Contact Line: 0312 508 79 79
- Address: İLBANK Financial Institutions and Investor Relations Department, ŞM Team, Emniyet Mahallesi, Hipodrom Caddesi No:9/21, Yenimahalle/ANKARA

➤ **World Bank (WB)**

- World Bank Grievances Response Service (GRS) Website:
- <https://www.worldbank.org/grs>
- E-Mail: grievances@worldbank.org
- Independent Inspection Panel Website:<https://www.inspectionpanel.org>

Stakeholder Engagement Plan

The process for receiving, recording, evaluating, and finalizing all applications submitted through the grievance channels described above is presented below. **Table 8:How the Grievance Mechanism Works** This was explained in detail in the table

Stakeholder Engagement Plan

Table 8: How the Grievance Mechanism Works

Steps in the GM process	Description of Process	Responsible Party	Time Frame
Receipt of Grievance	<ul style="list-style-type: none"> The grievance will be received through any communication method described above or by the grievance forms available in the construction site and mukhtars office. The grievances are submitted to ALDAŞ PIU. 	<ul style="list-style-type: none"> General Directorate of ASAT İLBANK ALDAŞ Supervision Consultant 	<ul style="list-style-type: none"> As soon as the grievance is received
Registration of Grievance	<ul style="list-style-type: none"> If the complainant raised their request verbally or did not fill a grievance form, the Field engineers, social, environmental and OHS experts of the contractor will fill in Annex 2 - Grievance Form and record the Grievance Form. Grievances received from other grievance channels will be received and recorded. Also, if the complainant requests the grievance to be handled anonymously, this request will be accepted, and the grievance will be recorded anonymously. If needed, detailed information regarding the grievance may be requested from the complainant. 	<ul style="list-style-type: none"> ALDAŞ Supervision Consultant Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received or within two (2) working days latest.
Reporting of Grievance	<ul style="list-style-type: none"> The grievance will be forwarded to the relevant persons responsible for resolving the grievance (eg. site manager, PIU experts, specialists at the construction sites, etc.) 	<ul style="list-style-type: none"> ALDAŞ Supervision Consultant Contractor 	<ul style="list-style-type: none"> Within three (3) working days latest.
Evaluation of Grievance	<ul style="list-style-type: none"> Grievances are evaluated as soon as they are received and resolved as soon as possible. However, if the resolution of the grievance requires a longer period of time 	<ul style="list-style-type: none"> İLBANK ALDAŞ Supervision Consultant Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received or within ten (10) working

Stakeholder Engagement Plan

	<p>due its nature and scope, it is evaluated within a maximum of ten (10) working days to determine if it is admissible for the project's GM. is relevant to the Project activities. If the grievance is not valid, the necessary explanation will be made to the complainant and, if possible, the complainant should be advised about the relevant institution to raise their requests.</p>		<p>days latest</p>
<p>Response to Grievance</p>	<ul style="list-style-type: none"> • For valid grievances, the complainant will be contacted to verify whether the resolution actions are sufficient. If the grievance cannot be closed, the complainant will be informed about other available GM channels that he/she can apply to (i.e. İLBANK, CİMER, YİMER, other legal remedies). After notification of this process, the Grievance Closure Form will be filled, and the grievance is closed. • All comments and grievances will be responded to verbally or in writing, according to the communication method preferred by the complainant, if the complainant's contact information is provided. • In cases where a suitable contact source is not specified or there is no opportunity to meet face to face with the complainant, Annex 3 -Grievance Closure Form will be filled out and handed in the mukhtar's offices where the relevant citizens live or work to provide necessary information. 	<ul style="list-style-type: none"> • İLBANK • ALDAŞ Supervision Consultant • Contractor 	<ul style="list-style-type: none"> • As soon as the grievance is received or within fifteen (15) working days latest.

Stakeholder Engagement Plan

Recording Grievance Result	<ul style="list-style-type: none"> Grievance Forms will be kept and submitted to İLBANK by the ALDAŞ Supervision Consultant with the Monthly Environmental and Social Monitoring Reports. 	<ul style="list-style-type: none"> İLBANK ALDAŞ Supervision Consultant 	<ul style="list-style-type: none"> As soon as the grievance is resolved
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6.3. Workers' Grievance Mechanism

Within the scope of the ASAT5/W3 Döşemealtı District Wastewater Network Construction Project implemented under the Green and Resilient Cities Project, an accessible, transparent, and confidentiality-based Workers' Grievance Mechanism (GM) has been established for all workers employed by the contractor and subcontractors. This mechanism has been designed to enable workers to easily submit their grievances and feedback, and QR code-based grievance boxes will be installed at construction sites. Through these boxes, workers will be able to access a digital grievance form and, if they wish, submit grievances anonymously without providing personal identification information.

All workers involved in the project will be informed, both at the time of recruitment and on a periodic basis, about the functioning of the Workers' Grievance Mechanism, application channels, confidentiality principles, and the prohibition of retaliation, and will receive mandatory awareness-raising training in this regard. These trainings will be conducted by social specialists within the contractor's organization, with the aim of ensuring that workers can use the grievance mechanism effectively, safely, and consciously. Information on the mechanism will be made visible on site through notice boards, posters, and QR code directions, ensuring equal, barrier-free, and safe access for all workers.

Within the scope of the Workers' Grievance Mechanism, cases related to sexual exploitation and abuse (SEA), sexual harassment (SH), other forms of gender-based violence (GBV), as well as forced labor, child labor, and human trafficking, shall be considered sensitive grievances due to their nature. Such grievances will be addressed through a differentiated and specialized approach compared to other grievances, taking into account the sensitivity of the issue, the risk of stigmatization, retaliation, or further harm to survivors, and the reluctance often associated with reporting such cases.

Accordingly, special arrangements will be applied to ensure that sensitive grievances are managed in a safe, ethical, survivor-centered, and confidentiality-based manner. In the event of a grievance related to SEA/SH, forced labor, or similar sensitive issues, referrals will be made—based on the survivor's explicit consent, needs, and preferences—to appropriate support services such as health care, psychosocial support, social assistance, and legal counseling. Where deemed necessary and subject to the survivor's consent, linkage with the national legal system will be established.

Stakeholder Engagement Plan

To determine whether allegations related to SEA/SH, forced labor, or similar sensitive issues are linked to project activities, an internal assessment process will be carried out among İLBANK/PIU, the contractor, and subcontractors. Such grievances will be securely and confidentially recorded only by authorized project personnel who have received appropriate training.

Any form of retaliation against individuals or groups submitting grievances is strictly prohibited. The submission of sensitive grievances through the project grievance mechanisms shall not, in any way, preclude the survivor's right to pursue judicial or administrative remedies. Upon receipt of such a grievance, initial protective and referral actions will be taken within a maximum of 48 hours, in line with the consent of the complainant.

Unless mandatory reporting is required under national legislation, responsible personnel will record only the minimum and necessary information in cases related to SEA/SH, forced labor, and similar sensitive incidents. This information will be shared, for further assessment and referral purposes, with the social specialist or SEA/SH focal point within ALDAŞ/PIU and İLBANK. All information related to sensitive grievances will be handled under strict confidentiality, and a separate procedure will be applied to ensure the safety and privacy of the survivor.

The application, registration, assessment, response, and closure steps of the Workers' Grievance Mechanism, along with the responsible parties and timeframes, are explained in detail in **Table 9** presented below.

Table 9:Functioning of the Workers' Grievance Mechanism

GRIEVANCE PERIOD	DESCRIPTION	RESPONSIBLE PARTY	Time Frame
Submission of Grievance	<ul style="list-style-type: none"> Grievances will be checked regularly from the suggestion/wish boxes at the construction site or workers will be asked to fill in Grievance Form. 	<ul style="list-style-type: none"> ASAT İLBANK ALDAŞ Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received
Registration of Grievance	<ul style="list-style-type: none"> Annex 2 - Grievance Form will be filled in by the field control engineers and the social expert of the contractor. Also, if the complainant requests the grievance to be handled anonymously, this request will be accepted, and the grievance will be recorded anonymously. 	<ul style="list-style-type: none"> ASAT İLBANK ALDAŞ Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received

Stakeholder Engagement Plan

	<ul style="list-style-type: none"> All grievances will be recorded on the same day, feedback will be given to the complainant, and detailed information regarding the grievance may be requested from the complainant within this period. 		
Reporting of Grievance	<ul style="list-style-type: none"> Grievances are forwarded to the relevant staff (project manager and PIU experts at the construction site) as soon as possible after receipt of the grievance. 	<ul style="list-style-type: none"> ALDAŞ Supervision Consultant Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received
Evaluation of Grievance	<ul style="list-style-type: none"> Evaluating grievances and determining whether the grievance is related to the Project, Making the necessary explanation to the complainant in case the grievance is not valid. 	<ul style="list-style-type: none"> ALDAŞ Supervision Consultant Contractor 	<ul style="list-style-type: none"> As soon as the grievance is received or within three (3) working days latest
Response to Grievance	<ul style="list-style-type: none"> For valid grievances, the complainant will be contacted to ensure whether the resolution actions are sufficient. To close the grievance by filling out the Grievance Closing Form. All comments and grievances will be responded to verbally or in writing, according to the communication method preferred by the complainant, if the complainant's contact information is provided. The social expert will inform the workers at the construction site about the actions taken for the grievances 	<ul style="list-style-type: none"> ALDAŞ Supervision Consultant Contractor Workers' representative 	<ul style="list-style-type: none"> As soon as the grievance is received or within fifteen (15) working days latest.

Stakeholder Engagement Plan

	recorded anonymously and the result of the grievances.		
Recording Grievance Result	<ul style="list-style-type: none"> Grievance Forms will be kept and submitted to İLBANK by the ALDAŞ Supervision Consultant with the quarterly Environmental and Social Monitoring Reports. 	<ul style="list-style-type: none"> İLBANK ALDAŞ Supervision Consultant 	<ul style="list-style-type: none"> As soon as the grievance is resolved

6.4. Sensitive Grievances

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

First of all, the complaining party has the right to remain confidential under the Turkish Constitution and the right to apply to the court at any time (in accordance with the Turkish Labor Law No. 4857 and the Turkish Civil Code No. 4721). In addition, Sub-Borrower personnel and sub-project employees will be able to directly communicate (via e-mail) with the Ethics Committee based at İLBANK Head Office in case of sensitive grievances. This issue will be clarified in the consultations carried out and in the introduction of the grievance mechanism. For cases related to gender-based violence, SEA/SH in the workplace or any potential child abuse in sub-project implementation/sub-project sites, the grievance will be directed to the relevant legal authorities or service providers by the Social Focal Point (based at İLBANK Head Office).

A survivor-centered approach will be used, with the goal of putting the safety and well-being of survivors at the forefront. This will be accomplished by referral to providing vital support services such as counselling, medical assistance, and legal assistance. Grievances shall be handled in an impartial manner through the implementation of transparent and fair investigation procedures.

However, in the case of grievances related to gender equality, sexual exploitation and abuse (SEA), or sexual harassment (SH), these will be given priority by the designated social specialists. All grievances will be treated as confidential, with additional safeguards applied to ensure the anonymity of complainants, particularly for such sensitive cases. Individuals will be able to submit their complaints confidentially and without pressure. Complaints should be submitted to the responsible grievance officer, who must, within 24 hours and only with the

Stakeholder Engagement Plan

explicit consent of the complainant, forward the grievance directly to the social specialist responsible for the project within the PMU. The PIU Head may be informed only if they are not the initial recipient of the complaint. No other party shall be informed or involved, ensuring maximum protection of the complainant's identity. Regular awareness and training workshops will be held for all team members and stakeholders involved in the project. The social expert of the contractor and the social expert of Subborrower will organize consultation meetings to increase awareness of the subject matter. These sessions will concentrate on SEA/SH issues, preventative techniques, and reporting responsibilities in order to promote understanding and prevention. Lastly, to prevent misconduct and guarantee a secure working environment, there will be clear accountability mechanisms in place, with defined repercussions for those who violate them. These consequences will be in accordance with the local laws and the regulations of the business.

7. MONITORING AND REPORTING

7.1. Summary of How SEP Implementation Will Be Monitored and Reported

The Sub-borrower will carry out monitoring activities throughout the entire Subproject lifecycle. Additionally, the Stakeholder Engagement Plan (SEP) will be updated in case of significant changes in the Subproject scope. This ensures the effective management of environmental and social impacts.

Monitoring activities will be carried out on a regular basis. The Project Implementation Unit (PIU) will conduct monthly monitoring activities and submit environmental and social compliance reports to ILBANK. ILBANK will carry out monitoring activities for audit purposes where necessary and submit six-monthly progress reports to the World Bank. Monitoring reports will assess the Subproject's environmental, social, and occupational health and safety (OHS) risks and impacts. Additionally, grievances and their resolution processes will be included in the reports.

The monthly reports will also include a record of stakeholder engagement activities conducted during the reporting period, along with a summary table of all grievances received and resolved within the specified timeframe. Within this framework, a monitoring and reporting chain has been established among the Sub-Borrower (ASAT General Directorate), the Project Implementation Unit and Supervision/Consultancy Team (PIU – ALDAŞ A.Ş.), and the Contractor during Project implementation. The allocation of roles and responsibilities related to the effective implementation of stakeholder engagement activities, the grievance mechanism, and reporting processes is summarized in **Table 10**

Table 10:Reporting Process Requirements and Role Allocation

Responsible Party	Roles and Responsibilities
<p>Antalya Water and Wastewater Administration (ASAT) General Directorate (Sub-Borrower)</p>	<ul style="list-style-type: none"> Throughout the duration of the sub-funding agreement, the management of relations with stakeholders assumes ultimate responsibility for the Sub-Project’s environmental and social performance. Appoints ALDAŞ as the Project Implementation Unit (PIU) and provides the necessary authorizations. Allocates adequate resources for the preparation, updating, and implementation of the Stakeholder Engagement Plan (SEP) and the Environmental and Social Management Plan (ESMP). Approves the establishment and effective operation of the Grievance Mechanism. Ensures the provision of required information for reporting to İLBANK and the World Bank.
<p>ALDAŞ Infrastructure Management and Consulting Services Industry and Trade Inc. (PIU/Supervision/Consultant)</p>	<ul style="list-style-type: none"> Plans, coordinates, and implements stakeholder engagement activities, including information disclosure, consultation meetings, and public engagement activities. Ensures the implementation of community and worker grievance mechanisms, maintains grievance records, and prepares related reports. Consolidates monthly and quarterly Environmental and Social (E&S) Monitoring Reports and grievance/feedback tables submitted by the Contractors. Supervises compliance with the SEP and Grievance Mechanism and follows up on corrective actions for identified non-compliances. Notifies ASAT and İLBANK of significant environmental and social incidents (sensitive grievance) or accidents within 24 hours. Reports stakeholder engagement and grievance-related information to ASAT and İLBANK and facilitates site visits.
<p>Contractor Company</p>	<ul style="list-style-type: none"> Complies with the responsibilities defined in the SEP and plans, organizes, and manages stakeholder engagement activities in coordination with the ALDAŞ Social Expert, including public disclosure of grievance and feedback channels and organization of consultation meetings. Prepares and distributes information boards, posters, and leaflets to inform affected communities and local businesses prior to works and in cases arising from construction activities (e.g., road closures); informs neighborhood headmen (mukhtars) and local residents. Implements the Grievance Mechanism; records grievances, manages the resolution process, and reports outcomes to the PIU. Provides necessary resources for corrective actions and coordinates the resolution of identified non-compliances or recurring issues. Submits monthly and quarterly environmental and social monitoring reports, public and worker grievance records, and stakeholder consultation tables to ALDAŞ PIU, and prepares consultation forms related to SEP implementation.

Stakeholder Engagement Plan

7.2. Reporting to Stakeholder Groups

Stakeholders will be kept informed through regular consultation meetings throughout the development of the Project. In this context, reporting will be provided on the Project's environmental and social performance, the implementation of the Stakeholder Engagement Plan (SEP) and the Grievance Mechanism, as well as the overall implementation progress of the Project.

The SEP will be periodically reviewed and updated, as necessary, on a quarterly basis during Project implementation. Information regarding grievances, requests, and related issues raised by the public, together with the status of corrective and/or preventive actions taken, will be monitored by the Project Implementation Unit (PIU) in coordination with the Contractor's project management.

In this context, all grievances and requests are recorded and regularly updated by the Contractor through completion of the Grievance Registration Form provided in **Annex 4-Grievance Log**

Form The completed grievance registration forms are submitted to the Project Implementation Unit, Aldaş Inc., on a monthly and quarterly basis. The PIU reviews and consolidates the grievance tables and submits them to İLBANK on a quarterly basis.

This reporting and data-sharing process constitutes a systematic monitoring mechanism to ensure the tracking of grievances, follow-up of corrective actions, and verification of closure processes. Information regarding stakeholder engagement activities and grievance management performance carried out under the Project will be shared with stakeholders through consultation meetings.

Stakeholder Engagement Plan

Annexes

1. Annex 1 Stakeholder Engagement Meeting (March 13, 2026) Minutes and Visuals.....	57
2. Annex 2 - Grievance Form	61
3. Annex 3 -Grievance Closure Form	62
4. Annex 4-Grievance Log Form	63
5. Annex 5- Consultation Form	64

Stakeholder Engagement Plan

1. Annex 1 Stakeholder Engagement Meeting (March 13, 2026) Minutes and Visuals

 İSTİŞARE FORMU (CONSULTATION FORM) 							
Formu Dolduran Kişi: (Person filling in the form)	U. Gizem Simsek (Aldas Sosyal Hizmetler)						
Tarih ve Yer: (Date/Place)	13.03.2026						
Toplantı Gündemi: (Agenda of the Meeting)	Proje kapsamında yürütülecek faaliyetlere ilişkin muhtarlar arasında bilgilendirme yapılması ve yerel görüşlerin alınması						
1. İLETİŞİM TÜRÜ (GRIEVANCE RECEIVED BY)							
İletişim Türü (Grievance Received By)	Yüz Yüze Toplantılar (Face to face Meeting)	<input checked="" type="checkbox"/>					
	Telefon (Telephone)	<input checked="" type="checkbox"/>					
	Çevrimiçi Toplantılar (Online Meeting)	<input type="checkbox"/>					
	Web İletişim Sayfaları (Contact Web Pages)	<input type="checkbox"/>					
	E-Posta (e-mail)	<input type="checkbox"/>					
	Diğer (Açıklama) (Other (Description))	<input type="checkbox"/>					
2. PAYDAŞ TÜRÜ (STAKEHOLDER TYPE)							
Kamu Kurumları (Public Inst.)	<input type="checkbox"/>	Vatandaşlar (Citizen)	<input type="checkbox"/>	Sivil Toplum Kuruluşları (Non-Governmental Organisation)	<input type="checkbox"/>	Meslek Odaları (Trade Association)	<input type="checkbox"/>
Muhtarlıklar (Mukhtars)	<input checked="" type="checkbox"/>	İlgi Grupları (Interest Groups)	<input type="checkbox"/>	Sanayi Birlikleri (Industrial Unions)	<input type="checkbox"/>	Medya (Media)	<input type="checkbox"/>
Akademik Kurumlar (Academic Institutions)	<input type="checkbox"/>	İşçi Sendikaları (Workers Union)	<input type="checkbox"/>	Özel Teşebbüs (Private Enterprise)	<input type="checkbox"/>	Diğer (Other)	<input type="checkbox"/>
3. SUNUM/KONU ÖZETİ (SUMMARY/SUBJECT OF PRESENTATIONS)							

Figure 7: Minutes of the Meeting Held on March 13, 2026, Page- 1

Stakeholder Engagement Plan

Sunumu Yapan Kişi(ler): (Person(s) made the Presentation)		Aldas sosyal hizmet U. Gizem Simsek		
Sunum/Konu Özeti: (Summary/Subject of Presentations)		Projenin amacı, kapsamı, sahada uygulamaları ve olası etkiler aktarılmış yerel hassasiyetler ve vatandaşlardan gelebilecek geri bildirimlere ilişkin değerlendirmeler paylaşılmıştır.		
4. DAVETLİLERİN LİSTESİ (MEVCUT İŞE)(LIST OF INVITEES) (IF AVAILABLE)				
No	Paydaş Bilgisi (Stakeholder Information) (Mukhtars, Municipalities, NGO's, Public Institutions, etc.)			
1	Yeniköy Mahale Muhtarı			
2	Bahçeyaka " "			
3	Tomular " "			
4	Atıncıkale " "			
5	Dizlercamı " "			
6	Yeşilbayır " "			
7	Otlabası " "			
8	Cıplıklı " "			
5. KATILIMCILARIN LİSTESİ (LIST OF PARTICIPANTS)				
No	Ad-Soyad (Name-Surname)	Paydaş Bilgisi (Stakeholder Information)	İletişim Bilgileri (Contact Information)	İmza (Signature)
1	Nesli Okun	Dizlercamı A221	05366	
2	Ali ÖNER	Yeşilca muhtarı	05327	
3	Ahmet Kuvrek	Yeniköy Muhtarı	05324	
4	Alkan AKTUN	Bahçeyaka Muhtarı	05324	
5	Sükran Karay Top	Yeşilbayır Muhtarı	05324	
6	Unal ÖZGÜR	Tomular Muhtarı	05333	
7	U. Gizem Simsek	Aldas Sosyal Hizmet	535 6	
8	Simay COŞKUN	Aldas - İnşaat Hch.	506 6	
9	Ahmet Emre SİMAN	ALDAŞ ŞE.	505 7	
10				

Figure 8: Minutes of the Meeting Held on March 13, 2026, Page- 2

Stakeholder Engagement Plan

6. İSTİŞARE NOTLARI

Toplantı kapsamında proje hakkında bilgilendirme yapılmış, şikâyet mekanizması muhtarlara açıklanarak anlatılmıştır.

Sahada bulunan hassas alanlar hakkında görüşler alınmış ve proje uygulamalarında dikkate alınması gereken kısıtlar ve noktalar muhtarlar tarafından belirtilmiştir.

Formu Dolduran Kişinin Adı/Soyadı : *Gizem Simsek*
(Person Filled in the Form Name/Surname)

İmzası : 
(Signature)

3 / 3

Figure 9: Minutes of the Meeting Held on March 13, 2026, Page- 3

Stakeholder Engagement Plan



Figure 10: Image from the Meeting Held on March 13, 2026

Stakeholder Engagement Plan

2. Annex 2 - Grievance Form

 		ANTALYA METROPOLITAN MUNICIPALITY / ASAT GENERAL DIRECTORATE		
		(GFC) GREEN AND FUTURE CITIES PROJECT		
		GRIEVANCE FORM		
Person filling out the form:		Date and Time:		
Subject:		Reference:		
1. INFORMATION ABOUT COMPLAINANT				
Name-Surname:		Grievance Received By:		
Identity Number:		Telephone <input type="checkbox"/>		
Phone:		Face to face Meeting <input type="checkbox"/>		
Adress:		Web / E-mail <input type="checkbox"/>		
E-mail:		Other (Describe) <input type="checkbox"/>		
Stakeholder				
Public Inst. <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/>	NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industrial Commerce <input type="checkbox"/>	Workers Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. DETAILED INFORMATION ABOUT GRIEVANCE				
Description of Grievance:				
Solution requested by the complainant:				

Figure 11: Grievance Form

3. Annex 3 -Grievance Closure Form

 		ANTALYA METROPOLITAN MUNICIPALITY / ASAT GENERAL DIRECTORATE	
		(GFC) GREEN AND FUTURE CITIES PROJECT	
		GRIEVANCE CLOSING FORM	
Reference:			
DETERMINATION OF CORRECTIVE ACTION			
1			
2			
3			
4			
5			
Responsible Departments			
RESOLUTION OF GRIEVANCE			
<i>This section will be filled and signed by the complainant in case the grievance specified in the "Grievance Form" is resolved</i>			
Grievance Closing Date:		Person Closing Grievance Name/Signature:	Complainant's Name/Signature:
...../...../.....			

Figure 12:Grievance Closure Form

4. Annex 4-Grievance Log Form

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

5. Annex 5- Consultation Form

 	ANTALYA BÜYÜKŞEHİR BELEDİYESİ / ASAT GENEL MÜDÜRLÜĞÜ (ANTALYA METROPOLITAN MUNICIPALITY / ASAT GENERAL DIRECTORATE)		
İSTİŞARE FORMU (CONSULTATION FORM)			
Formu Dolduran Kişi: (Person filling in the form)			
Tarih ve Yer: (Date/Place)			
Toplantı Gündemi: (Agenda of the Meeting)			
1. İLETİŞİM TÜRÜ (GRIEVANCE RECEIVED BY)			
İletişim Türü (Grievance Received By)	Yüz Yüze Toplantılar (Face to face Meeting)		<input type="checkbox"/>
	Telefon (Telephone)		<input type="checkbox"/>
	Çevrimiçi Toplantılar (Online Meeting)		<input type="checkbox"/>
	Web İletişim Sayfaları (Contact Web Pages)		<input type="checkbox"/>
	E-Posta (e-mail)		<input type="checkbox"/>
	Diğer (Açıklama) (Other (Description))		<input type="checkbox"/>
2. PAYDAŞ TÜRÜ (STAKEHOLDER TYPE)			
Kamu Kurumları (Public Inst.) <input type="checkbox"/>	Vatandaşlar (Citizen) <input type="checkbox"/>	Sivil Toplum Kuruluşları (Non-Governmental Organisation) <input type="checkbox"/>	Meslek Odaları (Trade Association) <input type="checkbox"/>
Muhtarlıklar (Mukhtars) <input type="checkbox"/>	İlgi Grupları (Interest Groups) <input type="checkbox"/>	Sanayi Birlikleri (Industrial Unions) <input type="checkbox"/>	Medya (Media) <input type="checkbox"/>
Akademik Kurumlar (Academic Institutions) <input type="checkbox"/>	İşçi Sendikaları (Workers Union) <input type="checkbox"/>	Özel Teşebbüs (Private Enterprise) <input type="checkbox"/>	Diğer (Other) <input type="checkbox"/>

Figure 13: Consultation Form Page-1

Stakeholder Engagement Plan

3. SUNUM/KONU ÖZETİ (SUMMARY/SUBJECT OF PRESENTATIONS)				
Sunumu Yapan Kişi(ler): (Person(s) made the Presentation)				
Sunum/Konu Özeti: (Summary/Subject of Presentations)				
4. DAVETLİLERİN LİSTESİ (MEVCUT İSE)(LIST OF INVITEES) (IF AVAILABLE)				
No	Paydaş Bilgisi (Stakeholder Information) (Mukhtars, Municipalities, NGO's, Public Institutions, etc.)			
1				
2				
3				
...				
5. KATILIMCILARIN LİSTESİ (LIST OF PARTICIPANTS)				
No	Ad-Soyad (Name-Surname)	Paydaş Bilgisi (Stakeholder Information)	İletişim Bilgileri (Contact Information)	İmza (Signature)
1				
2				
3				
...				
6. SORULAR VE CEVAPLAR (QUESTIONS and ANSWERS)				
1	Soru (Question):			
	Cevap (Answer):			
2	Soru (Question):			

Figure 14 Consultation Form Page-2

Stakeholder Engagement Plan

	Cevap (Answer):	
3	Soru (Question):	
	Cevap (Answer):	
...	Soru (Question):	
	Cevap (Answer):	
7. TOPLANTI TUTANAĞI (MINUTES OF MEETING)		

Formu Dolduran Kişinin Adı/Soyadı :
(Person Filled in the Form Name/Surname)

İmzası :
(Signature)

3 / 3

Figure 15: Consultation Form Page-3