

# TÜRKİYE ORGANIZED INDUSTRIAL ZONES PROJECT

# Denizli Organized Industrial Zone

# **Wastewater Treatment Plant Project**

# Stakeholder Engagement Plan

MAY 2024





## **REVISION HISTORY**

Rev.	Date of Issue	Issue Reason	Client	Project Owner	Consultant
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## TABLE OF CONTENT

RE	EVISION HISTORY	i
TAE	ABLE OF CONTENT	ii
LIS	ST OF ABBREVIATIONS	iv
EXE	XECUTIVE SUMMARY	
1 I	INTRODUCTION / PROJECT DESCRIPTION	2
1	1.1 Objectives	2
1	1.2 Components	
1	1.3 Location	
1	1.4 Area of Influence	5
2 (	OBJECTIVE/ DESCRIPTION OF SEP	9
3 5	STAKEHOLDER IDENTIFICATION AND ANALYSIS	
3	3.1 Methodology	
3	3.2 Affected Parties and Other Interested Parties	
3	3.3 Disadvantaged/ Vulnerable Individuals or Groups	
4 5	STAKEHOLDER ENGAGEMENT PROGRAM	
4	4.1 Summary of Stakeholder Engagement Done During Proj	ect Preparation15
-	4.2 Summary of Project Stakeholder Needs and Meth takeholder Engagement	
4	4.3 Stakeholder Engagement Plan	04
•		
5 F	RESOURCES AND RESPONSIBILITIES FOR IN GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER
5 F ENG	RESOURCES AND RESPONSIBILITIES FOR IN	IPLEMENTING STAKEHOLDER 
5 F ENG 5	RESOURCES AND RESPONSIBILITIES FOR IN GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24
5 F ENG/ 5 5	RESOURCES AND RESPONSIBILITIES FOR IN GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24 24
5 F ENG/ 5 5 6 (	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24 24 24 24 26
5 F ENG 5 5 6 (	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24 24 24 26 26
5 F ENG/ 5 6 ( 6 6	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24 24 26 26 27
5 F ENG/ 5 6 ( 6 6 6	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING STAKEHOLDER 24 24 24 24 26 26 26 27 29
5 F ENG 5 6 ( 6 6 6 7 N	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         31
5 F ENG 5 6 ( 6 6 7 N 7	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         and Reported         31
5 F ENG 5 6 ( 6 6 6 7 N 7 7	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES       5.1       Resources       5.2       Management functions and responsibilities       5.2         5.2       Management functions and responsibilities       5.2       GRIEVANCE MECHANISM         6.1       GM at the National Level       6.2       Project Level GM         6.3       Workers Grievance Mechanism       MONITORING AND REPORTING         7.1       Summary of How SEP Implementation Will be Monitored	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         31           and Reported         31           32         32
5 F ENG 5 6 ( 6 6 7 M 7 7 ANI	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES       5.1       Resources       5.2       Management functions and responsibilities       5.2         S.1       Resources       6.1       GRIEVANCE MECHANISM       6.1       GM at the National Level         6.1       GM at the National Level       6.3       Workers Grievance Mechanism         MONITORING AND REPORTING       7.1       Summary of How SEP Implementation Will be Monitored         7.2       Reporting Back to Stakeholder Groups       5.3	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         31           and Reported         31           32         33
5 F ENG/ 5 6 ( 6 6 7 M 7 7 7 8 NI A	RESOURCES AND RESPONSIBILITIES FOR IM         GAGEMENT ACTIVITIES         5.1 Resources         5.2 Management functions and responsibilities         GRIEVANCE MECHANISM         6.1 GM at the National Level         6.2 Project Level GM         6.3 Workers Grievance Mechanism         MONITORING AND REPORTING         7.1 Summary of How SEP Implementation Will be Monitored         7.2 Reporting Back to Stakeholder Groups         NNEXES	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         31           and Reported         31           33         33
5 F ENG 5 6 ( 6 6 7 M 7 7 ANI A A	RESOURCES AND RESPONSIBILITIES FOR IN         GAGEMENT ACTIVITIES         5.1 Resources         5.2 Management functions and responsibilities         5.2 Management functions and responsibilities         GRIEVANCE MECHANISM         6.1 GM at the National Level         6.2 Project Level GM         6.3 Workers Grievance Mechanism         MONITORING AND REPORTING         7.1 Summary of How SEP Implementation Will be Monitored         7.2 Reporting Back to Stakeholder Groups         NNEXES         Annex 1: Info cards of stakeholder consultation meetings	IPLEMENTING       STAKEHOLDER         24       24         24       24         24       24         26       26         27       29         31       31         and Reported       31         32       33         33       33         34
5 F ENG/ 5 6 ( 6 6 6 7 M 7 7 7 8 NI A 8 4 A	RESOURCES AND RESPONSIBILITIES FOR IN         GAGEMENT ACTIVITIES         5.1 Resources         5.2 Management functions and responsibilities         5.2 Management functions and responsibilities         GRIEVANCE MECHANISM         6.1 GM at the National Level         6.2 Project Level GM         6.3 Workers Grievance Mechanism         MONITORING AND REPORTING         7.1 Summary of How SEP Implementation Will be Monitored         7.2 Reporting Back to Stakeholder Groups         NNEXES         Annex 1: Info cards of stakeholder consultation meetings         Annex 2: Correspondence Letters with Stakeholders (Samples)	IPLEMENTING         STAKEHOLDER           24         24           24         24           24         24           26         26           27         29           31         31           and Reported         31           33         33           34         37
5 F ENG 5 6 ( 6 6 7 M 7 7 7 8 NI 8 4 8 4 4 4	RESOURCES       AND       RESPONSIBILITIES       FOR       IM         GAGEMENT ACTIVITIES       5.1       Resources       5.2       Management functions and responsibilities       5.2         5.2       Management functions and responsibilities       5.2       GRIEVANCE MECHANISM         6.1       GM at the National Level       6.1       6.1       GM at the National Level         6.2       Project Level GM       6.3       Workers Grievance Mechanism         MONITORING AND REPORTING       7.1       Summary of How SEP Implementation Will be Monitored         7.2       Reporting Back to Stakeholder Groups       NNEXES         Annex 1: Info cards of stakeholder consultation meetings       Annex 2: Correspondence Letters with Stakeholders (Samples)         Annex 3: Presentation of SCM (in Turkish)	IPLEMENTING       STAKEHOLDER         24       24         24       24         24       24         26       26         27       29         31       31         and Reported       31         33       33         )       34         37       47



## LIST OF TABLES

Table 3.1 Stakeholders – Land Owners and Users	
Table 3.2 – Companies/ Factories outside the OIZ and Near to Project Area	12
Table 3.3 Stakeholders – Project beneficiaries	
Table 3.4 Affected Parties	
Table 3.5 Other Interested Parties	
Table 3.6 Vulnerable Groups at AoI	14
Table 4.1 Methods of Engagement Process	
Table 4.2 Timeline of Activities	
Table 4.3: Stakeholder Engagement Plan	22
Table 5.1 Roles and Responsibilities	24
Table 6.1 Highlights of the GM	
Table 7.1 Indicators to be Monitored	

# LIST OF FIGURES

Figure 1.1	Location of DOIZ, Existing and Planned WWTP Area, Discharge and Collector Line 4	r
Figure 1.2	Social Area of Influence	;
Figure 4.1	SCM Announcements17	•



## LIST OF ABBREVIATIONS

CIMER	Presidential Communication Center	
DOIZ	Denizli Organized Industrial Zone	
ESF	Environment and Social Framework	
ESIA	Environmental and Social Assessment	
ESMF	Environmental and Social Management Framework	
ESS	Environmental Social Standards	
GM	Grievance Mechanism	
MoIT	Ministry of Industry and Technology	
OHS	Occupational Health and Safety	
OIZ	Organized Industrial Zone	
PCM	Public Consultation Meeting	
PIU	Project Implementation Unit	
PMU	Project Management Unit	
SCM	Stakeholder Consultation Meeting	
SEP	Stakeholder Engagement Plan	
TOIZsP	Türkiye Organized Industrial Zones Project	
WWTP	Wastewater Treatment Plan	
YIMER	Foreigners Communication Center	



#### **EXECUTIVE SUMMARY**

This Stakeholder Engagement Plan (SEP) has been prepared for the Denizli OIZ WWTP Project. It has taken as reference the Main Project's (Türkiye Organized Industrial Zones Project) SEP which has been prepared in accordance with WB ESF and national legislation.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the DOIZ will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

Stakeholder groups directly affected by the Denizli OIZ WWTP Project are landowners and users around the project area, firms and employees of the companies/ factories outside the OIZ but near to project area and DOIZ companies and their employees that will benefit from the WWTP. In addition, Denizli Municipality, Provincial Directorate of Environment and Urbanization, Provincial Directorate of Agriculture and Forestry, Pamukkale Municipality, Proakent Neighborhood Headman and irrigation unions are stated as other stakeholders. The engagement process began with the reconnaissance survey conducted on 12 and 13 September 2023. Findings of the field visits and observations were used to identify stakeholders. After the reconnaissance survey, meeting and knowledge-sharing platforms were established with various institutions, including governmental bodies and community members. The main platforms were public consultation meetings, round table meetings and key informant interviews. Minutes of meetings, questions, concerns, and grievances raised by stakeholders were collected during the engagement meetings held and contributed to social impact analysis.

The process of social impact assessment and stakeholder engagement complemented and supported each other. Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation

This document has been prepared to identify methods for consultation with internal and external stakeholders in order to minimize the negative social impacts and increase positive impacts of the Project. The plan first identifies stakeholders, explains their relationship with the project, proposes tools for consultations, describes the planned engagement activities, provides details of the grievance mechanism and includes indicators to determine the success of the plan. SEP has been prepared under the Environmental and Social Framework (ESF) and Türkiye legislation.

Activities will be announced by press releases and news on DOIZ's website. Denizli OIZ will establish a project-based GM before the construction. The main objective of a GM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specific objectives are to strengthen accountability to all stakeholders and provide channels for them to provide feedback and raise concerns and allow anonymous grievances to be processed per requirements of the ESS10. The costs associated with the implementation of SEP-related activities (meetings, dissemination materials, digital communication activities) will be covered under the budgets allocated by the DOIZ.

The SEP will be periodically revised and updated as necessary in the course of project implementation. Six-month summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project.



#### 1 INTRODUCTION / PROJECT DESCRIPTION

#### 1.1 Objectives

Türkiye Organized Industrial Zones Project (TOIZP) is financed by the World Bank/ International Bank for Reconstruction and Development (IBRD) through a loan for which the Ministry of Industry and Technology (MoIT) The project aims to increase the efficiency, environmental sustainability, and competitiveness of Organized Industrial Zones (OIZs) in Türkiye. Within the scope of the OIZP, sub-projects are subject to a screening process that takes into account three key factors: the project's nature, scale, and its location within environmentally sensitive areas. These identified sub-projects as 'substantial' then undergo a comprehensive Environmental and Social Impact Assessment in accordance with the World Bank's Environmental and Social Framework (ESF) and project-specific Environmental and Social Management Framework (ESMF) tools.

Within the scope of the TOIZP, sub-projects are subject to a screening process. In this regard, an Environmental and Social Screening Report was prepared by a Consultant assigned by the MoIT and approved by the WB ESF Team on March 2023 for the DOIZ Wastewater Treatment Plant Project, which is a sub-project within the scope of TOIZP.

Considering the Substantial-Moderate risks, the MoIT has contracted Türk Mühendislik Müşavirlik ve Müteahhitlik A.Ş. (TÜMAŞ) to prepare the Environmental and Social Impact Assessment (ESIA) Report for DOIZ WWTP Project.

DOIZ currently operates a wastewater treatment plant (WWTP) situated on a 28,836 m<sup>2</sup> plot within the DOIZ boundaries. This facility includes a closed area of 910 m<sup>2</sup> and an open area spanning 16,450 m<sup>2</sup>. Initially designed with a capacity of 42,000 m<sup>3</sup>/day, the WWTP was completed and became operational on December 31, 1997. The existing WWTP incorporates various units for physical, chemical, and biological treatment, as well as sludge dewatering. The discharge point for both the existing and planned WWTPs is Çürüksu Creek (which was also known as Sarıçay in the past), a highly sensitive water body that has long been threatened by improper industrial wastewater discharges from both local point and diffuse source polluters. Excess sludge from the existing WWTP, which is dewatered and reaches a dry content of 40-60%, is regularly transported to a licensed disposal facility. This disposal facility employs a solar drying unit to further increase the dry content of the accepted sludges.

To date, the WWTP has been operating at full capacity in compliance with the national discharge standards. Consequently, maintenance and repair costs for machinery and equipment have risen, and there have been challenges in sourcing spare parts. Additionally, it has been recognized that the total wastewater volume will increase due to the rising production capacities of companies within the DOIZ. Therefore, the construction of a new WWTP is deemed essential for the safe and environmentally sound operation of the DOIZ.

The primary objective of this Project is to establish a second-stage WWTP with a daily capacity of 30,000 m<sup>3</sup>. The Project will occupy an area of 26,840 m<sup>2</sup>. The planned WWTP will specialize in the removal of floatable materials, grit, grease, organic pollutants, and hazardous substances from the wastewater.

The Denizli Organized Industrial Zones Wastewater Treatment Plant Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.



#### 1.2 Components

The planned WWTP will encompass physical treatment components (screening, grit and grease removal), chemical treatment processes (coagulation, flocculation, sedimentation), and biological treatment methods (bio-P and primarily aeration tanks) to effectively eliminate various industrial pollutants from the wastewater. Furthermore, the WWTP will have a sludge stabilization system, encompassing a return sludge pumping station, sludge thickening, and sludge dewatering, to manage excess sludge. The dewatered sludge, stored temporarily within the WWTP premises, will be transported to a licensed disposal facility with licensed vehicles, mirroring the process implemented for the existing WWTP. All necessary design and construction activities will be carried out.

The project has two main components which are WWTP and discharge line. In addition, the collector line and the energy transmission line are the associated facilities of the project. In this ESIA report, the change in the route of the collector line will be taken into account as a difference made in the associated facilities defined in the Screening report. During the technical design studies of DOIZ's project team, the route of the collector line was changed to ensure that the water flows by gravity and pumps are not used.

#### 1.3 Location

The Project will be implemented in Pamukkale District of Denizli Province. Pamukkale District is 600 m away from DOIZ which is located in Honaz District. The closest settlement in the immediate vicinity of the Project Area is Pinarkent neighbourhood. The map showing the location of DOIZ, existing and planned WWTP area, discharge and collector line Project Area is given in Figure 1.1.



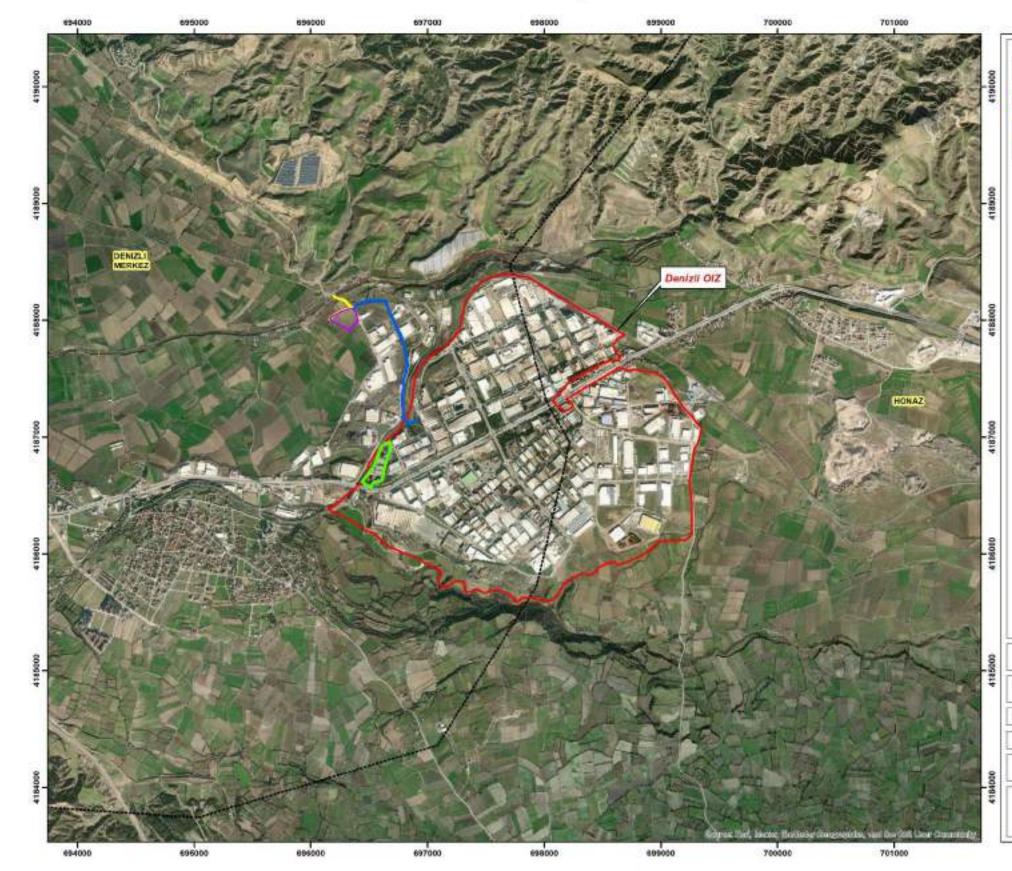


Figure 1.1 Location of DOIZ, Existing and Planned WWTP Area, Discharge and Collector Line

LEGEND	
Collector Line Existing WWTP Area Planned WWTP Area Discharge Line Denizi OlZ Boundaries District Boundary	
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Location of OLZ, Existing and Planned W Discharge and Collector Unit	MEP Area.



#### 1.4 Area of Influence

The WWTP will be constructed on the land registered as Koyunaliler<sup>1</sup> Neighbourhood parcel no 54. The size of land allocated for the planned WWTP is 2.57 ha and currently belongs to DOIZ. The transfer of land was completed on 15.12.2020, therefore WWTP does not require any land acquisition.

The Area of Influence (AoI) for the social impact assessment is identified as

- Pinarkent neighbourhood where WWTP will be located,
- Farmers (owner or user of the agricultural parcels) who are irrigating from Çürüksu Creek,
- Denizli OIZ,
- Factories near WWTP (at the west of Denizli OIZ)

The Project's Social Area of Influence which also covers the environmental Area of Influence is given in Figure 1.2.

<sup>&</sup>lt;sup>1</sup> Denizli became metropolitan municipality by the Act 6360 which came into effect at the 2014 local elections and changed the local administrative organization and like other metropolitan municipalities, its border overlap with provincial borders. Before Pinarkent neighbourhood established, there were two settlements Koyunaliler and Çömleksaz. Old divisions and names are still used.



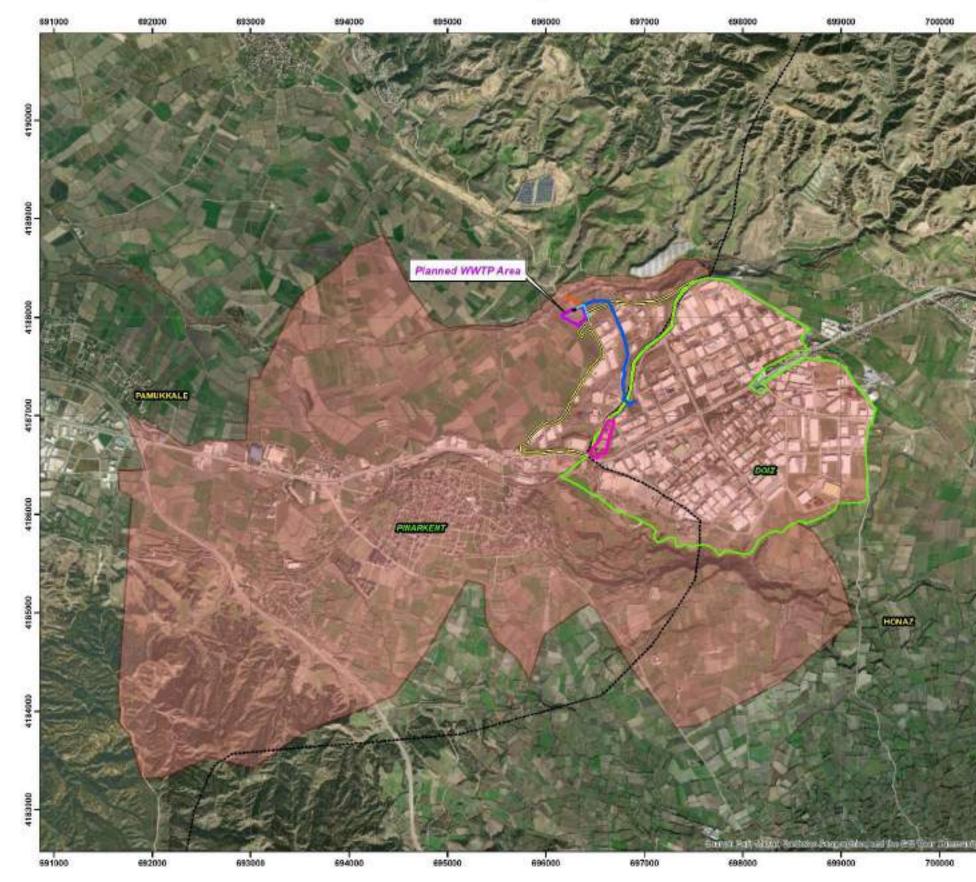
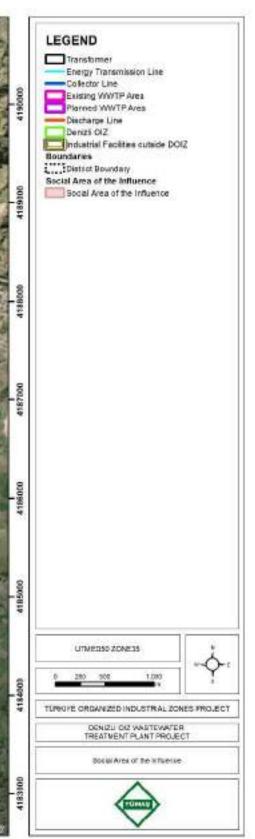


Figure 1.2 Social Area of Influence





## 2 OBJECTIVE/ DESCRIPTION OF SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which Denizli OIZ will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The purpose of the Stakeholder Engagement Plan is to guide Denizli OIZ to:

- Build and maintain a constructive relationship with all stakeholders, especially affected communities,
- Enable stakeholders' views to be taken into account in project design and environmental and social performance
- Promote and provide means for effective and inclusive engagement with all stakeholders and affected parties throughout the project life cycle and to
- Ensure that meaningful project information on environmental and social risks and impacts is disclosed to all stakeholders in a timely, understandable, accessible and appropriate manner and format.
- Ensure that project-affected communities have inclusive and accessible means to raise issues and grievances, and Denizli OIZ responds to and manages such issues and grievances appropriately.

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. Denizli OIZ is committed to implementing this SEP throughout all phases of the Project. The SEP is prepared in compliance with the World Bank's Environmental and Social Framework (ESF), the Environmental and Social Management Framework of Türkiye Organized Industrial Zones<sup>2</sup> Project and Turkish legislation. SEP is a living document and it will be regularly monitored, reviewed and updated by Denizli OIZ.

<sup>&</sup>lt;sup>2</sup> https://www.sanayi.gov.tr/sanayi-bolgeleri/dunya-bankasi-finansmanli-osb-kredilendirme-projesi/sf1604010641



## **3 STAKEHOLDER IDENTIFICATION AND ANALYSIS**

### 3.1 Methodology

Since the main finance source of the Project is WB; the Project must be in compliance with the good international practice, including WB ESSs, guidelines, and best practices documents alongside the national legislation. The World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS)10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice" (World Bank, 2017: 97). Specifically, according to ESS10, the process of stakeholder engagement starts with stakeholder identification and analysis.

The stakeholder identification and mapping are a process and visual tool to clarify and categorize the various stakeholders. It is a collaborative process of analysis, debate and discussion that draws from multiple perspectives to determine appropriate partners. The process of stakeholder mapping is as important as the result, and the quality of the process depends heavily on the knowledge of the people participating. Mapping will consist of below phases:

<u>Identification:</u> The first step in the mapping process is to identify all the potential stakeholders. Identification of relevant stakeholders and roles in the participatory dialogue process were considered. The mapping exercise began with social assessment fieldwork.

<u>Categorization:</u> A further analysis was conducted to understand stakeholder's relevance and perspective and to understand their relationship to the impact (s) and their usefulness for engagement. It is not practical to engage all stakeholder groups with the same level of intensity all of the time. It was looked at stakeholder issues and decided whether they met the engagement objectives. Key questions were asked before prioritization of the stakeholders.

<u>Inclusiveness and sensitivity:</u> Stakeholder identification will be undertaken to support better communications and build effective relationships during the Project cycle. The participation process for the projects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and project implementation process. Equal access to information of all stakeholders will be one of the main principles of the Project. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits, and the cultural sensitivities of diverse ethnic groups.

In order to meet best practice approaches, the project applied the following principles for stakeholder engagement: Openness and life-cycle approach, informed participation and feedback, inclusiveness and sensitivity.

## 3.2 Affected Parties and Other Interested Parties

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:

Internal Stakeholders:

- Denizli OIZ Personnel
- Supervision Consultant: Supervision Consultant and Employees
- Construction Contract: Construction Contract Firm and Employees

Communities (residents and businesses):



• Pinarkent Neighborhood (with a population of 6.778)

Business and Employees:

- Firms in Denizli OIZ (215 firms)
- Employees of OIZ firms: About 3.000 Employees
- Factories adjacent to Denizli OIZ and near WWTP
- Employees of Factories adjacent to Denizli OIZ and near WWTP:

The projects' stakeholders also include parties other than the directly affected communities, including project development and finance partners, government/ authorities, municipalities, and non-governmental organizations. Specifically, the following individuals and groups fall within interested parties:

Project Development and Finance Partners:

- World Bank
- Ministry of Industry and Technology

Central and Local Authorities:

- Denizli Provincial Governorate
- District Governorate of Pamukkale
- Denizli Provincial Directorate of Environmental Urbanism and Climate Change
- Denizli Industry and Technology Provincial Directorate
- Denizli Provincial Directorate of Health
- Provincial Directorate of Agriculture and Forestry
- Pamukkale District Directorate of Health
- Denizli Metropolitan Municipality
- Pamukkale Municipality
- State Hydraulic Works 21<sup>st</sup> Regional Directorate
- KGM 2<sup>nd</sup> Regional Directorate 27<sup>th</sup> Branch Chief
- TCDD 3<sup>rd</sup> Regional Directorate

Non-Governmental Organizations:

- Organized Industrial Zones Association
- Organized Industrial Zones Supreme Organization
- Denizli Chamber of Industry
- Irrigation unions

Print Media/ Electronic Media

- Deha 20
- Horoz Medya
- Denizli Yeni Olay

Directly affected parties were identified under three categories. These parties' significance of interest and influence on the project were categorized as "high".

**1.** Landowners and users around the project area: The list of landowners and users around the project was finalized with the officials of the Provincial Directorate of Agriculture and Forestry. According to the information obtained, all landowners live in Pinarkent Neighbourhood. There are 5



large parcels around the project. Information about parcel owners was provided by the Provincial Directorate of Agriculture and Forestry. Some of the landowners participated in the public consultation meeting.

#### Table 3.1 Stakeholders – Land Owners and Users

Name and Surname (Coded)	Female	Male
A.Ö		$\checkmark$
S.K	$\checkmark$	
N.B		$\checkmark$
N.S		$\checkmark$

2. Firms and employees of the companies/ factories outside the OIZ but near to project area: It has been observed that there are 31 companies located in the project impact area (including the collector line and discharge point). The list of companies/ factories received through Denizli OIZ is given in Table 3.2.

#### Table 3.2 - Companies/ Factories outside the OIZ and Near to Project Area

No	Name	Number of Employees
1	AFZ Tekstil Tarım Ürünleri Madencilik San. ve Tic. A.Ş	175
2	Akçakaya Tekstil San. ve Tic. Ltd. Şti.	57
3	Alindair Soğutma Sistemleri A.Ş.	17
4	Ata Tekstil	55
5	Beysu Atık Yönetimi Pınarkent Şubesi	40
6	Denba Ambalaj	92
7	Denizli Kaya Tekstil	500
8	Denizli Lay-Tex Tekstil San. ve Tic. Ltd. Şti.	30
9	Diztaş	17
10	Doğan Birlik Tekstil	110
11	Doğan Birlik Tekstil	65
12	Efsan Energy & Fan Systems	15
13	Emiralp Tekstil	53
14	EuropTec Cam A.Ş. Precision Glass	400
15	Feza Prefabrik & Konteyner	20
16	Fiesta Dokuma	95
17	GMK Kadife Tekstil	142
18	Hümateks	60
19	İptaş Güler Tekstil A.Ş.	80
20	İzmirlioğlu Rulman	4
21	Kukuroğlu Tekstil Kimya İnş. Gıda İth. İhr. San.	85
22	Maun Gida	211
23	MyStar Home Tekstil	52
24	Nayka Tekstil San. ve Tic. Ltd. Şti	77
25	Nuova Stone's Mermer	22
26	Noteks Tekstil A.Ş.	53
27	NR Marble	7
28	Mikroplas Plastik Ambalaj A.Ş. (Perçin İplik)	45
29	Onur Öz Ceyhan Tekstil San. ve Tic. Ltd. Şti.	17
30	Ren Cam	23
31	Sanrem Tekstil Dokuma San. ve Tic. Ltd. Sti. 57	
TOTAL	·	2.676

**3.** DOIZ companies that will benefit from the WWTP: The stakeholders who will benefit from the project are all companies at DOIZ, however, there exist 11 companies within the borders of the OIZ waiting for the project for capacity increase. The list of companies primarily beneficiaries of the project was obtained from Denizli OIZ. Company list and contact information are given in Table 3.3.



#### Table 3.3 Stakeholders – Project beneficiaries

No	Name	Contact person	Number of Employees
1	Altınbaşak Tekstil San. ve Tic. A.Ş.	Mehmet Çalışkan	560
2	Başaranlar İnş. Malz. San. ve Tic. A.Ş.	Mehmet Hilmi Serter, Mehmet Serter	225
3	Kemal Ergene-Seray Ergene	Efe Eke	33
4	Denbassan Baskı Boya San. ve Tic. Ltd. Şti.	Kamil Akbaş, Arif Yaşa	248
5	Rateks Baskı Boya San. Tic. A.Ş.	Mehmet Ateş	325
6	Gökhan Tekstil San. ve Tic. A.Ş.	Ahmet Gökşin	645
7	Kemal Uğurlu Tekstil San. ve Tic. A.Ş.	Kemal Uğurlu	587
8	Akürün Tekstil Tarım Gıda San. ve Tic. A.Ş.	Aykut Gökşin	108
9	Tosunoğlu Tekstil San. ve Tic. A.Ş.	Mehmet Tosunoğlu	241
10	Faber Mermercilik San. ve Tic. A.Ş. I. Kiracı	Cüneyt Komkeser	58
11	Faber Mermercilik San. ve Tic. A.Ş. II. Kiracı	Abdullah Tavas	23
TOTAL			3.053

The projects' stakeholders also include parties other than the directly affected communities. Those having medium and high level of influence as well as interest are given in Table 3.5.

## Table 3.4 Affected Parties

Stakeholder Group		Relevance of Stakeholders to the Project	Significance of Influence	Significance of Interest	
		Denizli OIZ	Project owner	High	High
Affected	Internal Stakeholders	Supervision Consultant: Supervision Consultant and Employees	Responsible for Supervision during construction and commissioning	High	High
	Stakeholders	Construction Contract: Construction Contract Firm and Employees	Responsible for construction	High	High
Parties	Communities (residents and businesses)	Pinarkent Neighbourhood (with a population of 6,778)	Potential noise and dust emission during the construction phase	High	High
	Business and Employees	Firms in Denizli OIZ (215 firms)	Potential noise and dust emission during the construction phase, User/ beneficiary after commissioning	High	High
		Employees of Firms: About 3,000 Employees	Potential noise and dust emission during the construction phase	High	Medium

#### **Table 3.5 Other Interested Parties**

Stakeholder Groups	Category	Project Phase (Pre construct, const, operation	Significance of Influence	Significance of Interest
Denizli Municipality	Public service authority	PC, C, O	High	Medium
Pamukkale Municipality	Public service authority	PC, C, O	High	Medium
Provincial Directorate of Environment and Urbanization	Public service authority	PC, C, O	High	High
Provincial Directorate of Agriculture and Forestry	Public service authority	PC, C, O	Medium	Medium
21. Regional Directorate of State Hydraulic Works	Public service authority	PC, C, O	High	Medium
Local communities	Pinarkent Neighborhood	PC, C, O	Medium	Low
R. Yazıcıoglu Irrigation Association	Union	PC, C, O	Low	High



	- 25			
Bayrak Irrigation	Union	PC, C, O	Low	High
Association				-
World Bank	International development partner	PC, C, O	High	High
MoIT PIU	Project implementing partner	PC, C, O	High	High
Denizli Governorate	Public service authority	PC, C	Medium	Low
Contractors and Sub- Contractors	Implementation partner	PC, C, O	High	High
Firms under DOIZ (not beneficiaries)	Administrative partners	PC, C, O	Medium	Medium

## 3.3 Disadvantaged/ Vulnerable Individuals or Groups

According to WB ESS 1, social risks and impacts, including risks that project impacts fall disproportionately on individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable should be taken into account.

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend (WB ESS 1)

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following:

- Individuals over 65 years of age living alone;
- Physically or mentally handicapped;
- People who have a chronic illness or are bedridden;
- Women heads of households;
- Poor people who live on state or association aid;
- Persons who are economically dependent on unique natural resources;
- Peasants who do not own land and work daily on other people's land;
- Refugees.

According to the information provided by the headmen of the neighbourhood, information about vulnerable/disadvantaged individuals/groups is presented in Table 3.5.

#### Table 3.6 Vulnerable Groups at Aol

Individuals over 65 years of age living alone	Women-Headed Families	Poor Families*	Physically / Mentally disabled	Refugee
5	17	12	13	65

\* Make a living with aids

Source: Head of Neighbourhood Interview, 2023

As mentioned in ESIA, there will not be any negative impact on disadvantaged/ vulnerable individuals or groups. During the stakeholder engagement process, special attention was given to vulnerable groups and comprehensive announcements as well as outreach activities were carried out. Using basic language, conducting neighbourhood announcements, and creating diversity of announcement channels enabled the vulnerable groups to be reached.



#### 4 STAKEHOLDER ENGAGEMENT PROGRAM

#### 4.1 Summary of Stakeholder Engagement Done During Project Preparation

As mentioned in the screening report, the OIZ conducted consultation meetings and questionnaires with the existing 215 industrial firms to collect current data on their current water consumption and generated wastewater amount from their operations to determine the capacity of 2<sup>nd</sup> Stage WWTP facility. At the meetings, the firms were informed about the project scope. It is noted that no grievances have been conveyed about the existing operating WWTP at OIZ. OIZ informed the former landowner in October 2022 to end his cultivation activity after harvesting existing crops and leaving the project land.

The engagement process began with the reconnaissance survey conducted on 12 and 13 September 2023. Findings of the field visits and observations were used to identify stakeholders. After the reconnaissance survey, meeting and knowledge-sharing platforms were established with various institutions, including governmental bodies and community members. The main platforms were public consultation meetings, round table meetings and key informant interviews. Minutes of meetings, questions, concerns, and grievances raised by stakeholders were collected during the engagement meetings held and contributed to social impact analysis. The process of social impact assessment and stakeholder engagement complemented and supported each other.

During the reporting process, stakeholders were interviewed for the following purposes given in Table 4.1.

Stakeholder	Stakeholder Category	Method	Aim
Five key informants including the head of the neighbourhood	Indirect	In-depth interview	Data collection and engagement
Three land owners/ users	Direct	In-depth interview	Data collection and engagement
Community members	Indirect	Public consultation meeting	Data collection and engagement
Representatives of 10 firms out of the DOIZ	Direct	Round table meeting	Data collection and engagement
Representatives of 7 firms from DOIZ	Indirect	Round table meeting	Data collection and engagement

#### Table 4.1 Methods of Engagement Process

The findings of the interview are summarized below:

Meeting with Pinarkent Neighborhood Mukhtar (Özlem Çağlar, Muhammed Çağlar)

- General information about the neighborhood was received by the Mukhtar and it was agreed to fill out the detailed interview form. The information is used for the stakeholder identification and analysis.
- At the stakeholder participation meeting, it was stated that the meeting place and announcements would be made by the Mukhtar Office. Organizational details have been discussed.
- The exact location and location name of the region has been clarified.

Meeting with Provincial Directorate of Agriculture and Forestry (Agricultural Infrastructure Branch Infrastructure- Şakir Çınar)

- Agricultural activities are carried out in 60%-70% of the Büyük Menderes basin. Cherry is an agricultural product with export value.
- A total of 57,000 active and passive people in the basin are registered in the farmer registration system.
- Complaints to the Provincial Directorate are generally made through CIMER.



- Non-agricultural investments cannot be made in large plain projects in Turkey, such as the one in Denizli. The project has been granted a special permit.
- Project construction and facility should be managed very well.
- If there is a problem with the capacity of the existing facility, precautions should be taken.

Meeting with DESKİ General Manager (Niyazi Türlü)

- The pollution situation in Çürüksu stream was evaluated at the meeting.
- Discharge activities of companies outside the DOIZ were discussed. In addition, detailed information was received about the cooperation projects carried out by the municipality across Denizli women's cooperatives.

The first stakeholder consultation meeting (SCM) was held on October 24, 2023, at the old municipality building in Pinarkent Neighbourhood. The target group of the meeting was the community level. Announcements were made through neighbourhood announcements, newspaper announcements, website announcements and posters. The timeline was as in Table 4.2.

#### Table 4.2 Timeline of Activities

Activity	Institution	Date
Social media	Pinarkent neighbourhood, DOIZ	12.10.2023
Web site	PIU and DOIZ	17.10.2023
Newspaper ad. at local media	TUMAS	12.10.2023
Posters	TUMAS	16-20.10.2023
Neighbourhood announcement	Head of Pinarkent neighbourhood	20-24.10.2023

Sample photos of announcement channels are given in Figure 4.1.



a) Announcement at Cafehouse



b) Announcement at Bus Stop



Figure 4.1 SCM Announcements

a) Announcement at Local Newspaper - Dena

A 30-minute slide show containing the general framework of the project, components, the work to be done and also possible environmental and social impacts was presented (Annex 3). Following the presentation, there was a question-and-answer session. Concerns and opinions raised by the stakeholders are given below:

• It has been stated that the landowners in the area may be disturbed by the dust that will be created. Information was requested from DOIZ on how the project land was acquired.



- It was stated by the participants that the region is an important agricultural land and the concerns of the landowners that they would be negatively affected by the project were expressed.
- A participant who has agricultural land on the adjacent parcel of the area where the project will be carried out stated that he was worried about the odor formation caused by the Project and requested that the project not be carried out.
- Some participants stated that the Project will create positive effects on the Çürüksu Stream, that by reducing the current discharge, the pollution of the Çürüksu Stream will be reduced, and therefore they have a positive perspective on the Project.
- Some participants stated that this project is expected to have more positive effects on local employment, considering that Denizli OIZ has been beneficial in the employment of Denizli and Pinarkent residents in the past.
- It was stated by some participants that the Project area was not actually directly connected to Pinarkent, but that they participated remotely due to the Project.
- It was claimed by a participant that the construction site of the DOIZ was taken from the hands of a person through enforcement.

Responses to raised concerns and opinions are given below:

- The project, supported by DOIZ, is highlighted for its contribution to economic development.
- Special permissions for the project have been obtained from the Provincial Directorate of Agriculture. Positive environmental impacts are expected, with assurances that Çürüksu Creek will benefit without adding extra burden. Construction in the surrounding agricultural areas is noted to occur only under special circumstances.
- OIZ representatives assure that no odor problems are expected from their activities. In case they arise, necessary precautions will be taken. No complaints have been reported from the existing wastewater treatment plant.
- The claim made by a participant about taking the construction site of the DOIZ from the person through enforcement was corrected by the DOIZ officials and the issue was clarified.
- OIZ authorities acknowledge the water's dirtiness at the current discharge point, noting that the industrial zone outside the OIZ also discharge in the same area.
- Participants have been informed about the project's grievance mechanism.

Following this meeting, on October 25<sup>th</sup>, two round table meetings were held with representatives of the firms. The purpose here is to observe that the representatives may have different expectations and needs compared to the community level and to observe the organizations' possible contributions to the stakeholder participation plan. Additionally, these meetings contributed to the social impact assessment process. In addition, the contact points of the municipalities and public institutions were invited to the meetings. Announcements were made by Denizli OIZ - under the supervision of TUMAS - via official letter and e-mail. Feedback was received during the consultation and was taken into account by the ESIA team. Concerns and opinions raised by the firms out of the OIZ but near to project are given below:

- It has been stated, especially by the representatives of the textile industry companies, that the dust that will be formed will have negative effects because the machines they use in the dyehouses are extremely sensitive to dust and the textile products are affected by dust.
- In the meeting held with industrial facilities located in the nearby Denizli OIZ but outside the borders of the DOIZ, feedback was given regarding the vehicle traffic in the region. Concerns were mentioned by the representatives of the facilities that the existing problems, accidents and congestion on the roads would increase due to the DOIZ Project, and it was stated that the General Directorate of Highways was contacted regarding the issue, but a solution has not been created yet. The stabilized road, which is used by all industrial facilities in the region for material transportation and personnel transfer etc., is evaluated together with the traffic impacts planned to



be created by DOIZ works. The contribution of the companies using this road to vehicle traffic including daily number of vehicles using the road (round trip) (including personnel shuttles) has been expressed.

• Representatives of industrial facilities that are not within the OIZ and continue their activities have stated that they want to be included in the borders of the OIZ in order to benefit from the opportunities of the OIZ.

Responses to raised concerns and opinions are given below:

- Project representatives stated that dust suppression methods and irrigation will be applied to prevent dust formation.
- Traffic measures will be defined, taking into account the meetings held within the scope of ESIA studies and the feedback of these meetings; It was stated that the defined measures will be presented and opened to comments again. It was stated that a Traffic Management Plan will be prepared and implemented by taking the opinions into consideration. It has been stated that the necessary security measures will be developed, especially to prevent possible accidents on the roads, and traffic signs, traffic lights and speed limits will be implemented. At the same time, the issue of communicating with competent authorities regarding traffic practices was emphasized.
- The OIZ regional manager stated that this issue is being followed by them through legal platforms.
- The importance of workshops and separate meetings in terms of stakeholder engagement was expressed.
- It has been stated that economic development and employment increase are expected as a result of the project.
- DOIZ's water efficiency efforts were shared with its stakeholders.

Concerns and opinions raised by the firms in the Denizli OIZ (beneficiaries) are given below:

- OIZ Beneficiary organization representatives did not make any negative comments and stated that they expected the Project to be implemented as soon as possible.
- OIZ Beneficiary organization representatives stated that they expect to implement the Project as soon as possible and plan to increase their production capacity, since the existing wastewater treatment facility is not sufficient to increase their production capacity.
- Information was given about the work carried out by the Irrigation Association.
- It has been stated by a private waste disposal company that hazardous waste vehicles are already using the construction road.

Highlights of the meetings are provided in Annex 1. Participation lists are provided in Annex 4.

Within the scope of ESIA studies second stakeholder consultation meeting (SCM) will be held following the approval of the Draft ESIA by the Client (and the World Bank). In the second SCM, the findings, identified risks associated with the sub-project, mitigation measures, and monitoring plan will be presented to the public and the stakeholders.

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

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- Formal/ informal face-to-face meetings,
- Focus group meetings,



- One-on-one meetings,
- Digital communication tools (including web pages, correspondence by phone/email, WhatsApp, short message service),
- Written materials,
- Grievance mechanism,
- Media promotions.

A range of tools will be utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. The project has and will continue to use the following methods for interacting with stakeholders:

- Formal/ informal face-to-face meetings with stakeholders –will be the main form of consultation throughout the lifetime of the Project. Stakeholders will be informed about these consultation meetings by telephone, WhatsApp messages, short message service (SMS), brochures, posters, or e-mail. The stakeholders will be informed at least fourteen (14) days before meetings or information-sharing activities.
- Focus group meetings with stakeholders will be a form of engagement that will support negotiations throughout the life of the Project. It will also provide a suitable environment for stakeholders to express their views.
- One-on-one meetings will be a form of engagement to provide a more comfortable environment for stakeholders, especially vulnerable/disadvantaged individuals.
- Digital Communication Tools -Denizli OIZ website (https://www.dosb.org.tr) is a public website created for announcements, documents, reports, etc. The ESIA /ESMP and SEP documents prepared for the Project will be published in English and Turkish via the Denizli OIZ website. Information on the application of the grievance mechanism created by Denizli OIZ will be also announced on the Denizli OIZ website. At the same time, all up-to-date information about the Project will be made available to the public via the website and social media accounts of the Denizli OIZ. In addition, telephone, WhatsApp messages, short message service (SMS), brochures, posters, and e-mail will be used for information disclosure and announcements.
- Written materials including brochures, leaflets and posters. will be used to inform stakeholders about the Project. Written materials will include information about the Project and the project's E&S principles the Grievance mechanism, and stakeholder engagement tools created for the Project. These written materials will be in Turkish.
- Grievance mechanism will be employed as per the World Bank's ESS10 requirement to get grievances from all types of stakeholders. Information on the mechanism will be widely disclosed to all parties.
- Media promotions: Throughout the life of the Project, information disclosure and contact information will be promoted through local newspapers and the social media accounts of Denizli OIZ.

All kinds of notifications or complaints from stakeholders during informal/official face-to-face or Internet meetings will be recorded for processing in the mechanism and evaluated within the process of the grievance mechanism. The days and hours of the meetings will be arranged in consultation with the stakeholders, and the highest possible participation will be aimed. A shuttle will be arranged for stakeholders to come to the meetings when necessary, or the responsible people will be at the stakeholders' location for face-to-face meetings.



## 4.3 Stakeholder Engagement Plan

The most important issue during construction will be to identify the stakeholders most likely to be affected by the construction activities and to inform them about these activities and program changes. The aim will be to provide tailored consultation on community health and safety to minimize risk to the lowest possible level with a prompt response time to consider any suggestions or resolve a complaint.

Additionally, stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism, and the project's overall implementation progress.



#### Table 4.3: Stakeholder Engagement Plan

Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsible Body
Pre- Construction	Before Construction	<ul> <li>Project E&amp;S principles</li> <li>Grievance mechanism</li> <li>Community health and safety</li> <li>Environmental and social risks and mitigation measures</li> <li>Updates about the Project</li> </ul>	<ul> <li>Formal/ informal face-to-face meetings,</li> <li>Focus group meetings,</li> <li>Digital communication tools,</li> <li>Written materials,</li> <li>Stakeholder consultation meetings</li> </ul>	• All stakeholders	<ul> <li>PMU</li> <li>PIU</li> <li>E&amp;S Consultant</li> </ul>
Pre- Construction	ESIA/ESMP and SEP preparation stage	ESIA /ESMP and SEP	<ul> <li>Stakeholder consultation meetings</li> <li>Digital communication tools,</li> <li>Written materials.</li> </ul> (The documents will be disclosed on the DOIZ website and MoIT PIU website) (yesilosb.sanayi.gov.tr)	• All stakeholders	<ul> <li>PMU</li> <li>PIU</li> <li>E&amp;S Consultant</li> </ul>
Construction	Two (2) days before possible traffic impact, whenever necessary during the construction	Traffic safety	Digital communication tools	<ul> <li>Internal Stakeholders,</li> <li>Communities (residents and businesses),</li> <li>Business and Employees,</li> <li>Local Authorities.</li> </ul>	<ul> <li>PMU</li> <li>Contractor</li> <li>Supervision Consultant</li> </ul>
Construction and Operation	Whenever necessary during the construction and operation	Updates on project activities and progress	<ul> <li>Formal/ informal face-to-face meetings,</li> <li>Focus group meetings,</li> <li>One-on-one meetings,</li> <li>Digital communication tools,</li> <li>Written materials,</li> </ul>	All stakeholders	<ul> <li>PMU</li> <li>Contractor</li> <li>Supervision Consultant</li> </ul>



Project Stage	Estimated Date/ Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsible Body
			<ul><li>Grievance mechanism,</li><li>Media promotions</li></ul>		
Operation	Regularly throughout the operating period.	Learning the expectations/ needs/receiving grievances	<ul> <li>Formal/ informal face-to-face meetings,</li> <li>Focus group meetings,</li> <li>One-on-one meetings,</li> <li>Digital communication tools,</li> <li>Written materials,</li> </ul>	All stakeholders	• PMU
Operation	Before operation	Operation	<ul> <li>Formal/ informal face-to-face meetings,</li> <li>Focus group meetings,</li> <li>One-on-one meetings,</li> <li>Digital communication tools,</li> <li>Written materials,</li> </ul>	Internal stakeholders, Communities (residents and businesses), Business and employees, Central and local authorities, Vulnerable or disadvantaged groups	<ul> <li>PMU</li> <li>Contractor</li> <li>Supervision Consultant</li> </ul>
Operation	Before operation/ regularly throughout the operating period.	Safety in emergencies	<ul> <li>Formal/ informal face-to- face meetings,</li> <li>Focus group meetings,</li> <li>One-on-one meetings,</li> <li>Digital communication tools,</li> <li>Written materials,</li> </ul>	Internal stakeholders, Communities (residents and businesses), Business and employees, Central and local authorities, Vulnerable or disadvantaged groups	<ul> <li>PMU</li> <li>Contractor</li> <li>Supervision Consultant</li> </ul>



## 5 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

#### 5.1 Resources

DOIZ will be in charge of stakeholder engagement activities The costs associated with the implementation of SEP-related activities (meetings, dissemination materials, digital communication activities, etc.) will be covered under the budgets allocated by the DOIZ. All the activities will be conducted by the use of the human resources of the DOIZ.

## 5.2 Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are mainly the contractor and DOIZ project team. Monitoring and evaluation of the SEP will be conducted by the MoIT. The stakeholder engagement activities will be documented through progress reports. Roles and responsibilities in the Project are given in Table 5.1.

Responsible Entity	Roles/ Responsibilities	Activities
World Bank	To fulfil the project implementation support role to ensure that the project is carried out in line with WB ESF.	<ul> <li>Monitoring SEP implementation through progress reports.</li> </ul>
MoIT PIU	<ul> <li>Ensuring that the stakeholder engagement is understood by PMUs and other stakeholders.</li> <li>Coordinating interface and reporting to/from the World Bank in relation to the implementation of SEP.</li> <li>Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions.</li> <li>Coordinating and monitoring GM focal points in OIZ and contractor level.</li> <li>Implementing social and environmental monitoring</li> </ul>	<ul> <li>Monitoring SEP implementation through progress reports.</li> <li>Conducting site visits to audit the performance of the DOIZ regarding compliance with the provisions set out in the SEP.</li> </ul>
DOIZ Project Management Unit (PMU) / Social Expert	<ul> <li>Implementation of SEP.</li> <li>Planning and implementation of SEP activities in close collaboration with the MoIT PIU.</li> <li>Informing DOIZ's SEP-related activities to the management board of the DOIZ.</li> <li>Reporting on the implementation of SEP activities to MoIT PIU.</li> <li>Executing the defined grievance mechanism in the SEP properly and informing MoIT PIU about the overall implementation status, incl analysis of grievances and adequacy of their resolution.</li> </ul>	<ul> <li>Implementing SEP.</li> <li>Reporting on the implementation of SEP activities to MoIT PIU.</li> <li>Informing MoIT PIU about the overall implementation status.</li> </ul>
Supervision Consultant	<ul> <li>Monitoring the contractors' recording and resolution of grievances, and reporting these to OIZ and PIU in their monthly progress reports.</li> </ul>	<ul> <li>Monitoring the contractors' recording and resolution of grievances, and reporting.</li> </ul>

#### Table 5.1 Roles and Responsibilities



TÜRK MÜHENDİSLİK MÜŞAVİRLİK VE MÜTEAHHİTLİK A.Ş.

	<ul> <li>Contacting with PIU GM Focal Point for the follow-up of the grievances.</li> </ul>	
Contractor	<ul> <li>Informing MoIT PIU and DOIZ of any issues related to their engagement with stakeholders.</li> <li>Informing PMU for environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.).</li> <li>Developing and implementing a grievance mechanism both for the E&amp;S performance of the project and for their workforce including sub-contractors, before the start of work in compliance with PIU's GM requirements.</li> </ul>	<ul> <li>Informing MoIT PIU and DOIZ.</li> <li>Informing PMU.</li> <li>Developing and implementing a grievance mechanism.</li> </ul>



## 6 GRIEVANCE MECHANISM

The project includes the construction of 2<sup>nd</sup> Stage wastewater treatment plant to increase the operational capacity of the current WWTP facility at DOIZ. All industrial facilities within the OIZ will be benefitted from the project. Farmers of the adjacent cultivated lands and employees, and employers of the nearby industrial facilities might be adversely affected by minor impacts during the construction phase and possible odors when WWTP is in operation.

However, DOIZ will establish a project-based GM before the construction. The main objective of a GM is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specific objectives are to strengthen accountability to all stakeholders and provide channels for them to provide feedback and raise concerns and allow anonymous grievances to be processed per requirements of the ESS10.

Any grievances that may occur during the project will be addressed at four levels. The GM at the first level will be undertaken by the DOIZ. Secondly, contractors will establish their own GM for undertaking grievances for sub-contractors and workers. As the third level the MOIT's GM will be effectively adapted for the Project. Finally, the Presidential Communication Center (CIMER) will constitute the fourth level of the grievance mechanism of this project.

## 6.1 GM at the National Level

The Presidential Communication Center (CIMER) receives and processes requests and grievances regarding public institutions and their activities. In case of DOIZ-related issues, the DOIZ Public Relations Specialist will receive the complaint from CIMER and assign it to the relevant parties within DOIZ, monitor the progress and supervise the relevant staff in closing the complaint. If the MoIT PIU receives a complaint from CIMER regarding the DOIZ activities, the specialist will work in coordination with MoIT PIU GM focal point and they take necessary actions to close out the complaint.

In addition to CIMER, there is the Foreigners Communication Center (YIMER) which provides a centralized grievance system for foreigners.

## <u>CİMER</u>

Website: https://www.cimer.gov.tr/ Hotline: 150 Postal Address: TC Cumhurbaşkanlığı Külliyesi Beştepe/ANKARA Phone: +90 312 590 20 00 Fax: + 90 312 473 64 94

## <u>YIMER</u>

Website: www.yimer.gov.tr Hotline: 157 Postal Address: TC Cumhurbaşkanlığı Külliyesi Beştepe ANKARA Phone: +90 312 5157 11 22

On the other hand, all stakeholders can also submit individual applications directly to the MoIT grievance mechanism established specifically for the Project.



#### <u>MoIT</u>

#### E-mail: info@sanayi.gov.tr dboneri@sanayi.gov.tr Website: www.sanayi.gov.tr

## 6.2 Project Level GM

Currently, the employees/employers of the firms in the OIZ and the citizens can send any request, suggestion or grievances through telephone (+90 258 269 10 02), e-mail (dosb@dosb.org.tr) and-via 'Send Message' and 'Communication' sections of its institutional website. DOIZ has ISO 9000 quality management certificate and the complaint mechanism can be integrated into this system. Highlights of the GM are given in Table 6.1.

#### Table 6.1 Highlights of the GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	Complaints can be submitted through CIMER, YIMER, MoIT and DOIZ.	-	Presidency's Communication Center, and Foreigners Communication Center and related authorities PIU, PMU
Grievance uptake	<ul> <li>Grievances can be submitted via the following channels:</li> <li>Telephone hotline (+90 258 269 1002)</li> <li>Website (https://www.dosb.org.tr/)</li> <li>Official letter to Grievance focal points at local facilities</li> <li>E-mail to dosb@dosb.org.tr</li> <li>Verbal grievances to CLO</li> <li>Grievance boxes in local points / grievance box to be lodged via any of the above channels</li> </ul>	-	Local grievance focal points
Sorting, processing	Any complaint received is forwarded to the DOIZ public relations department, logged in a track list, and categorized according to the following complaint types: environmental impact, social impact, HR, OHS and others (except in case of grievances related to SH/SEA where specific channel ensuring confidentiality will be used).	Upon receipt of a complaint	Local grievance focal points



Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by the department of public relations of DOIZ.	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by the Project Manager. The PMU, as appropriate, supports the Project Manager in deciding who should deal with the grievance and determines whether additional support for the response is necessary. A proposed resolution is formulated by PMU and communicated to the complainant by PMU/ Social Expert.	Within 10 working days	The Complaint Committee composed of PMU, contractor and supervision consultant, union representative.
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected.	15 working days after the implementation of the resolution	Social expert
Monitoring and evaluation	Data on complaints will be collected and reported to the DOIZ management quarterly.	Quarterly.	PMU
Training	Trainingneedsforstaff/consultants in the contractorsare as follows:ISO 9000 system,ESIA, SEP, GBV, SEA/SH.	before starting work	PMU

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. If the complainant is unhappy with the grievance decision and wishes to appeal, they should let the social expert know. The complainant will be invited to an appeal meeting within a defined period and the appeal will be heard by a more senior manager.

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

The application of the grievance mechanism will be circulated to the project team by DOIZ as a procedure. In addition, a labor grievance mechanism and procedure will also be established within the scope of the project.

In addition to the project's GM for its internal and external stakeholders, ESS2 requires the establishment of a Workers' Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. The Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees).



## 6.3 Workers Grievance Mechanism

The grievance mechanism process on employee rights, occupational health and safety issues is operated in accordance with the basic process depending on the grievance mechanism workflow process.

The contractor will develop and implement a grievance mechanism for the workforce, including subcontractors, prior to the start of work. Subcontractors will prepare Labor Management Plan that will include a detailed description of the employee grievance mechanism.

The workers' grievance mechanism will include:

- a procedure to receive grievances such as comment/complaint forms, suggestion boxes, email, and a telephone hotline;
- stipulated timeframes to respond to grievances and to resolve cases;
- a register sheet to record and track the timely resolution of grievances; and
- a responsible department to receive, record, address and track the resolution of grievances. If there is a trade union at the workplace, union representative is part of GM resolution committee..

The workers' grievance mechanism will be described in staff induction training, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances;
- There will be no discrimination against those who express grievances and any grievances will be treated confidentially;
- Anonymous grievances will be treated equally as other grievances, whose origin is known; and
- Management will treat grievances seriously and take timely and appropriate action in response.

Employees will be informed about employee rights, basic occupational health and safety, and the grievance mechanism and operation at the time of their employment. An up-to-date list of contact points will be provided in employee handbooks and/or bulletin boards.

When a dispute arises regarding employee rights, it is essential that the employee and his manager, who have the problem, meet informally and resolve the problem without using a complaint mechanism or legal means. If the employee cannot reach a solution with his managers, all legal rights are reserved, by applying to the GM contact persons assigned at the contractor/sub-contractor level, through the complaint boxes in the workplaces or by phone at MoIT 444 62 78 or info@sanayi.gov.tr or can submit their complaints using dboneri@sanayi.gov.tr e-mail addresses. Necessary measures are taken to prevent employees from being under pressure and to protect confidentiality.

All applications made through any complaint channel, with or without a name, will be accepted. Requests regarding employee rights and occupational health and safety are collected in complaint boxes placed in areas easily accessible to employees. Complaints and suggestions collected are carried out in accordance with the time limits specified in the basic process of the grievance mechanism.

With the receipt of the requests, the workflow complaint mechanism is carried out in accordance with the workflow chart.

Contractors may seek advice and support from the Supervision Consultant (SC) to address grievances submitted in a language other than Turkish. Supervision Consultants will monitor the



contractors' recording and resolution of grievances, and report these to PIU. The process will be monitored by the OIZs' focal point and GM Focal Point in MoIT.

Although the risk from project activities and in the Turkish context is low, the grievance mechanism for workers shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). The GM that will be in place for the project workers will also be used for addressing SEA/SH-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues.



## 7 MONITORING AND REPORTING

#### 7.1 Summary of How SEP Implementation Will be Monitored and Reported

The Project Owner will implement the monitoring activities throughout the lifetime of the Project. In addition, SEP will be updated in case of major changes that may arise in the scope of the Project.

Monthly monitoring activities will be carried out by the public relations expert of DOIZ. and E&S compliance will be reported regularly to MoIT. MoIT will carry out its supervision monitoring as required and report to the World Bank quarterly on the progress and updates. Monitoring reports will aim to identify environmental, social, OHS related risks and impacts. Grievances will also be included in the monitoring reports.

The quarterly reports will also include account of any stakeholder engagement activities (as a separate log carried out during the specified reporting period) carried out along with a summary table of all grievances received and resolved during that reporting period. Key performance indicators are below:

- Number and nature of grievances including gender, category of grievance, status of grievance.
- Number and nature of grievances responded to in the target timeframe of one month.
- Providing feedback to stakeholders on the implementation of the Grievance mechanism.
- Internal audit of the Grievance mechanism to ensure that the Grievance mechanism is implemented and that grievances are adequately handled.

A set of Indicators will also be monitored and regularly integrated by the project into the project progress report. Indicators to be monitored is given in Table 7.1.

Subject	Indicator	Target	Project Phase	Monitoring Frequency	Responsibili
Stakeholder Engagement	Number of stakeholder meetings	2	Construction and operation	Quarterly	PMU
Stakeholder Engagement	Number of stakeholders engaged	-	Construction and operation	Quarterly	PMU
Stakeholder Engagement	Provided stakeholder feedback, ideas, and suggestions	-	Construction and operation	Quarterly	PMU
Stakeholder Engagement	Average time taken to respond to stakeholder inquiries, concerns, or requests for information	5 days	Construction and operation	Quarterly	PMU
Grievance	Number of all complaints received	0	Construction and operation	Monthly	PMU
Grievance	Percentage of resolutions within the prescribed timeline	100%	Construction and operation	Monthly	PMU
Grievance	Number of complaints open for more than 30 days	0	Construction and operation	Monthly	PMU
Grievance	Average time taken to close grievance	5 days	Construction and operation	Monthly	PMU

 Table 7.1 Indicators to be Monitored

			TÜRK MÜHENDİSLİK MÜŞAVİRLİK VE MÜTEAHHİTLİK A.Ş.		
Grievance	Number of GBV and SEA/SH related grievance	0	Construction and operation	Monthly	PMU

## 7.2 Reporting Back to Stakeholder Groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Six-month summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Semi-annually prepared report will be disseminated at DOIZ's website. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways such as round table meetings and information notes disseminated by social media and DOIZ's website.



# ANNEXES

Annex 1: Info cards of stakeholder consultation meetings

Date: 24.10.2023 Time: 14.00 Venue: Pinarkent Old Muniipality Building The number of participants: 16

**Highlights:** Producers located on the project border stated that they would be disturbed by dust.

They wanted the project not to be done if possible.

Information was requested from DOIZ regarding how the project land was acquired.

It was emphasized by DOIZ that the project will contribute to economic development.

## Date: 25.10.2023 Time: 10.00 Venue: Regional Directorate of DOIZ The number of participants:13

**Highlights:** The economic development and employment increase that will occur as a result of the project was emphasized.

DOIZ's work on water efficiency was shared with its stakeholders.

The importance of fairs and separate meetings regarding stakeholder participation was expressed.

Date: 25.10.2023 Time:15.00 Venue: Regional Directorate of DOIZ The number of participants:22

**Highlights:** It was stated that textile products were affected by dust.

Feedback was given regarding vehicle traffic in the region.

A public transport stop was mentioned in the region close to the DOIZ border.









## Annex 2: Correspondence Letters with Stakeholders (Samples)



# DENİZLİ ORGANİZE SANAYİ BÖLGESİ MÜDÜRLÜĞÜ



Say1: 2023/1336

17.10.2023

#### DENİZLİ BÜYÜKŞEHİR BELEDİYESİ SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜ Pamukkale/DENİZLİ

Denizli Organize Sanayi Bölgesi Müdürlüğümüzce, "Dünya Bankası Finansmanlı Organize Sanayi Bölgeleri Projesi" kapsamında, İlimiz Pamukkale İlçesi, Koyunaliler Mahallesi, 54 parselde; 30.000 m<sup>3</sup>/gün kapasiteli "Denizli Organize Sanayi Bölgesi Müdürlüğü İleri Biyolojik ve Kimyasal Merkezi Atıksu Arıtma Tesisi" yapım işi için çalışmalarımız devam etmektedir. Proje debisinin yüksek olması nedeniyle, ESIA (Cevresel ve Sosyal Etki Değerlendirme Raporu) ve SEP (Paydaş Katılım Planı) dokümanlarının hazırlanması gerekmektedir.

Bu nedenle Dünya Bankası Çevresel ve Sosyal Etki Değerlendirme çalışması gereğince aşağıda belirtilen tarih ve saatlerde OSB içerisinde ve dışında işletmede olan firmalara yapılan faaliyetlerle ilgili olarak "Paydaş Katılım Toplantısı" yapılacaktır.

Kurumunuz tarafından görevlendirilecek yetkili personellerinizin yapılacak olan toplantıya katılımını arz ederiz.



Toplantı Yeri ve Adresi	: Denizli OSB Mūdūrlūgū Binası Konferans Salonu	
Toplantı Tarihi	: 25.10.2023 Çarşamba	
Toplantı Saati	: 10.00 (OSB içerisinde faaliyette olan firmalar)	
	14.00 (OSB dışında Pınarkent Sanayi Alanında faaliyette olan	
	firmalar)	





# DENİZLİ **ORGANİZE SANAYİ BÖLGESİ** MÜDÜRLÜĞÜ



Say1: 2023//331\_

16.10.2022

# AFZ TEKSTİL TARIM ÜRÜNLERİ MADENCİLİK SAN. VE TİC. A.Ş

Malumunuz üzere; Bölge Müdürlüğümüzce, \*Dünya Bankası Finansmanlı Organize Sanayi Bölgeleri Projesi" kapsamında, İlimiz Pamukkale İlçesi, Koyunaliler Mahallesi, 54 Parselde; 30.000 m³/gūn kapasiteli, "Denizli Organize Sanayi Bõlgesi İleri Biyolojik ve Kimyasal Merkezi Atıksu Antma Tesisi" yapım işi için çalışmalarımız devam etmektedir. Proje debisinin yüksek olması nedeniyle, ESIA (Çevresel ve Sosyal Etki Değerlendirme Raporu) ve SEP (Paydaş Katılım Planı) dokümanlarının hazırlanması gerekmektedir.

Bu nedenle Dünya Bankası Çevresel ve Sosyal Etki Değerlendirme çalışması gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili bilgilendirmek, görüş ve önerilerinizi almak için "Paydaş Katılımı ve Bilgilendirme Toplantısı" yapılacaktır.

Durumu bilgilerinize ve toplantıya katılımınızı rica ederim.

HANI BOLO b, DENIZL 1982 40 DE M. Abdůlk dir USLU Bölge Múdűrű Yön, Kur, Başkanı

**Toplants** Tarihi Toplantı Saati

Toplantı Yeri ve Adresi :Denizli OSB Müdürlüğü Binası Konferans Salonu :25.10.2023 :14.00





# DENİZLİ ORGANIZE SANAYI BÖLGESİ MÜDÜRLÜĞÜ



Savi : 2023//333

16.10.2023

## ALTINBASAK TEKSTIL SAN. VE TIC. A.S. Denizli OSB Mah. Turan Bahadır Cad. No:17 Honaz/DENIZLI

Malumunuz üzere; Bölge Müdürlüğümüzce, "Dünya Bankası Finansmanlı Organize Sanayi Bölgeleri Projesi\* kapsamında, İlimiz Pamukkale İlçesi, Koyunaliler Mahallesi, 54 Parselde; 30.000 m³/gün kapasiteli, "Denizli Organize Sanayi Bölgesi İleri Biyolojik ve Kimyasal Merkezi Atıksu Arıtma Tesisi" yapım işi için çalışmalarımız devam etmektedir. Proje debisinin yüksek olması nedeniyle, ESIA (Çevresel ve Sosyal Etki Değerlendirme Raporu) ve SEP (Paydaş Katılım Planı) dokümanlarının hazırlanması gerekmektedir.

Söz konusu proje tamamlandığında işletmenizde oluşan evsel ve endüstriyel nitelikli atık sularınız mevcut işletilmekte olan arıtma tesisinden ayrılarak yapılacak olan kollektör hattı (kanalizasyon şebekesi) ile yeni arıtma tesisine verilecektir.

Bu nedenle Dünya Bankası Cevresel ve Sosyal Etki Değerlendirme çalışması gereğince aşağıda belirtilen tarih ve saatte faaliyetle ilgili bilgilendirmek, görüş ve önerilerinizi almak için "Paydaş Katılımı ve Bilgilendirme Toplantısı" yapılacaktır.

Durumu bilgilerinize ve toplantıya katılımınızı rica ederim.

STRANI BOLGS NIZE DENIZLI 1982 6 Ahmet TAS M.Abdülkadir USLU

Bölge Müdürü

Yön.Kur.Başkanı

Toplantı Tarihi Toplantı Saati

: 25.10.2023 : 10.00

Toplantı Yeri ve Adresi : Denizli OSB Müdürlüğü Binası Konferans Salonu



Annex 3: Presentation of SCM (in Turkish)

# ORGANİZE SANAYİ BÖLGELERİ PROJESİ

# DENIZLI ORGANIZE SANAYI BÖLGESI ATIKSU ARITMA TESISI PROJESI

# PAYDAŞ KATILIMI TOPLANTISI

**BILGILENDIRME SUNUMU** 

Extm 2023







PROJE YÜRÜTÜCÜSÜ: Ganayi ve Teknoloji Sakanlığı

PROJE UYGULAYICISI: Denizli Organize Sanayi Bölgesi

PROJE FINANSORU: Dünya Bankası





#### **PROJENIN AMACI ve FAYDALARI**

- Planlanan Atiksu Aritma Tesisi (AAT), günlük 30.000 m<sup>3</sup> kapasiteye sahip olacaktır.
- Proje, DOSB'nin artan kapasiteye uygun bir atıksu arıtması sağlamasını ve böylece halk sağlığı, çevre ve doğal kaynaklara yönelik riskleri azaltmasını sağlayacaktır.
- Proje, Türkiye'nin atıksu sektöründe ulusal ve uluslararası kalite standartlarına uyum çabalarına katkı sağlayacaktır.
- Halkın sağlık standartları projenin uygulanmasıyla iyileştirilecektir.



#### PROJENIN YER

- Proje, Denizli ili Pamukkale ilçesinde uygulanacaktır.
- OSB içindeki boş arazilerin sınırlı olması nedeniyle, mevcut AAT'nin gelecekteki işletme kapasitesini artırmak için planlanan AAT'nin inşa edileceği ek arazi, 15 Aralık 2020 tarihinde OSB tarafından satın alınmıştır. Planlanan AAT için belirlenen parsel 54 Parsel olarak belirlenmiştir.
- Ayrıca planlanan AAT ile mevcut AAT arasında 1220 metrelik bir kollektör hattı inşa edilecektir. Bu hat mevcut yol güzergahi kullanılarak yapılacaktır.









#### PROJENIN ÖZELLİKLERİ

- Mevcut AAT deşarjı Çürüksu Deresi'ne yapılmaktadır. Ayrıca kontrolsüz/bilinmeyen başka deşarjlar da söz konusudur. Çürüksu Dere yatağına atılan atıklar önemli çevresel sorunlar yaratmaktadır.
- Projenin personel ihtiyaçıları henüz kesinleşmemiş olmakla beraber işe alım süracinde yerel halka öncelik verilecektir.
- Projenin inşaat faaliyetlerinin 15 ay süreceği öngörülmektedir.







DEŞARJ NOKTASI MEVCUT DURUM









## Çevresel Hassas ve Koruma Alanları

- Proje alanı Büyük Ova Koruma Alanı içerisinde yer almaktadır.
- Projenin sadece bölgeye değil, Büyük Menderes Havzası'nın tamamına olumlu etki yapması beklenmektedir.
- Atıksuların uygun şekilde arıtılması ve deşarj edilmesi tarım alanlarından geçerek Aksu Deresi'ne akan Çürüksu Deresi için olumlu olarak değerlendirilmektedir.
- Proje, atik suyun gerekli standartlara uygun şekilde aritilmasını amaçlamaktadır.
- Projenin uygulanması için Sarayköy Ovası'nda tarım dışı kullanım izni alınmıştır.



#### Arazi, Jeoloji ve Toprak

#### Olasi Etkiler

- Üsttoprak kaybi
- Inşaat makine ve elopmanlasında kullandacak yakıt, böye ve şağların suznası ve dökülmesi nederiyle topisk kirlenmesi riski
- Proje kapsamında oluşacalı katı veya sıvı atikların kontrolsüz depolarması veya bertataf edilmesi durumunda oluşabileceli toprak kotiliği

#### Erczyon potensiyeli

#### Almacak Önlemler

- Sadoco belirkenon çalışma sahaları ve güzorgahları kullanılarak kirkenmeye maruz kalacak toprak miktarı minimuma indirgenecektir.
- Gantyede kullandacak iş makteesi ve araçlar için gerekt olan yakıt, öncelikle en sakıs istarşındas sağlanacak, garakti görülmesi halinde sahada depolanabilecek yakıflar, gerekti sizdirmazlık önlemlerinin alındığı alanlarda depolanacakta.
- Eruzsana sebep olmamak için bitkisel ioprağın sıvraması olması gelekenden erken tapılmayacaklır ve sıvralan taprak uvgun koşullarda (genre dizenlemesi vs) yeriden kultanılmatı üzere depolanacaktır.





## Yüzey Suyu ve Yeraltı Suyu

#### Olasi Etkiler

- · Inseat aşamasında, çakşanların günlük ihtiyaçları su temini gereksinimini yaratacaktır.
- · Projenin insaat asamasinda itoz bastirma için su kullanlacaktır.

#### Almacak Önlemler

- AATnin çılaş suşru kalıtına itgil yönetmekke belirililen sırız değerlerle uyuntu olacak ve deşarj edilen su Çaraksa Denesi'nin kaltanmeşine neder olmayacaktı.
- 👻 Bindam ve pompalarn laken ve onarm iden geckleimeden ysplacaldr
- Toz bashma faaliyeten için sulamaya bağlı yüzey akışı önlenecektir.
- 👻 İnşaat çalışmalarında oluşacak atksu, su kaynaklarına deşar) edilmejecektir.



#### Flora, Fauna ve Ekosistemler

#### Olası Elkiler

- Saha zvareti srasinda, Çüriksu Denesi çevresindeki fabitatin kontrolsiz atik bertarati ile bozulmuş durumda olduğu ve herhangi bir sucul yaşam olmadığı gözlemlermiştir.
- Deşarştrattı Parrukkale Belediyesi sorumluluğundaki mevcut yolar içerisinde inşa edilecektir itatin yol ile kesişmediği alanlar moditiye aları olup herhangi bir doğal yaşam alam tespit edirinemiştir.

#### Alinacak Önlemler

- Proje alanı içerisinde korunan ve hassas ekosistemler wiya türlerin ölmesi örgörümemeldedir.
- Calqime alam similari içerisinde gerekli görülmedikçe bilki örtüsü temizliği yapılmayacaldır. Bilki ortüsü temizliği yapıları yerlerde mankan olduğunca takılar bilkinindirme yapılacaldar.
- Aran hazırlığı aşamasından önce, inşaat haaliyetlerinin yapılacağı bölge tirceden bekrenecek ve bu sınırların dışına çıkılmaşacaktır





## Atıklar

#### Attk Üretecek Olas Kamaklar

- Inpasta calgacak personerkaynaka kas alak oluşumu.
- Anşap kağıt kartor, plastik vb. andralaj atikanı
- Progimin ingast ve ştetne aşamulan tapcananda okrabilerek tehlikeli ve dosi anklar, kontanime kaşlar, bez ve şidenler alterpi ve akomulatorlar, alte yağlar vit.
- Hattyat ve inpast alitary



#### Almacak Önlamler

- Pros topaments olupical ability aik yoratim tryeranyaira govi yorothecelety
- Akklar çok beldatikmadori bartaraf adilacekter.
- Get disüptäcklemeyen ve değarlendinkemeyen kalı ataklar şantiye satasındaki şüp kusteşirifanında toplanacısı ve belediye taxılındar uzatlaştırlacaktır. Atakların sahata şaktiması neya görnülmes sitz konusu simayacaktı.
- Akk obspans, depelarman ve betarah ile kali kayalar tasulasakki: Geperdepelaran atidar dzelitikarna gite sentarchelacaktir.







#### **Olasi Etkiler**

 Abksu antima tesisi kaynakli tesis çevresinde düşük miktarda koku oluşumu görülebilir. Ancak en yakın hassasancı, atılısu antima tesisinden güneydoğu yönünde Pinarkent mahailesidir. Proje alanı çevresindeki tanım atlantında ve sanayi tesislerinde etki görülme olasılığı vardır.

#### Almacak Onlemler

- Antma işlemi sonrası oluşan fazla çamur, kokusa neden olmayacak şekilde stabilize edilecektir.
- × Koku oluşumunu bitemek içir çamurut uygun şekilde ve zamanında bertaraf edilmesi sağlanacaktır.
- Kotulu gazların kontrolu için düzerli olarak emisyon ölçümleri gerçekleştirilecektir.
- Koku lie ilgili şikayıtları yönetmelk için işkayarı bir şikayat giderme mekunizmasi kurulacaktır.





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#### Olası Etkiler

Tesis çovosinde gerçekleştirilecek inşaat faaliyetleri dolasıyla trafiğin artması ve aksaması

#### Almacak Önlemler

- Trafik Yonetim Plani hazirlanacak, ve trafiği etkileyebilecek tum fasiliyetler bu plana göre yaplacaktır.
- Tratik, trafik güverliğini ve trafik akşındaki aksamaları minimuma indirecek şekide dizenlerecektir.
- Yolann kapatimasi gerekiyorsa iesmi izinler alinacak ve aksakligin gizargatii ve saresi oncedes belirteneceklir.
- Attematif gizzerganlar beiklenecek ve uaşım frahğın yoğunluğuna: göre programlanocaktır.
- « Gerekli tufik levhaları ve bariyerler yüklerici barafından konulucaklır
- Sikayet mekanizmasi kurulacak we isletilecektir







# SOSYO-EKONOMIK ETKILER

## Konular

- Demografik yapı
- Temel geçim kaynakları

## Yapılan Çalışmalar

- İstatistikler ve kilit bilgilerin derlenmesi
- Killit kişi görüşmeleri
- Etkilenen kişilere yönelik soru formları
   Mahalle bilgi formu





# SÜRECE NASIL DAHIL OLABILIRSINIZ?

Sanayi ve Teknoloji Bakanlığı: info@sanayi.gov.tr

Denizli Organize Sanayi Bölgesi: dosb@dosb.org.tr

Pinarkent Muhtarlığı



# ORGANIZE SANAYI BÖLGELERİ PROJESI

DENIZLİ ORGANİZE SANAYİ BÖLGESİ ATIKSU ARITMA TESİSİ PROJESİ

# KATILIMINIZ VE İLGİNİZ İÇİN TEŞEKKÜR EDERİZ!

# SORULAR, YORUMLAR VE GÖRÜŞLER





# Annex 4: Participation Lists of Public Consultation Meetings

Public Consultation Meeting

TC. SAMANY		TOPLANTI KATILIMCI İMZA FORJ	MU
'oplantı No: iündem: 'eri / Tərih 'oplantı Katılımcıla	functiont Iski	-Ameri (DOSB XAT Belodye Birosi	Projes;) 24/10/2023
urum	Isim	E-Mail	Telefon
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norken	f sakin Lerinden	mustera Goksa	122 122 - 22 j
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Muca	Gonghi Pinar Exterior KARA	hent siwa & A	M2 Som aring



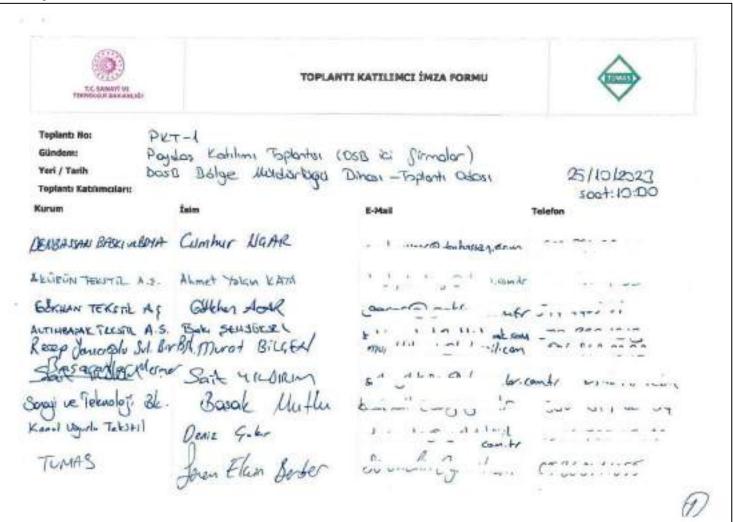
TOPLANTI KATILIMCI İMZA FORMU T.L. SANAY! YE TEXNOLOUI BAKAMING HKT-1 **Toplant** No: Hallan Bilgilendinimeri (DOSB AAT Projesi) Pinorkert Eski Beleslye Binosi 24/10/2023 Gündem: Yeri / Tarih Toplanti Katılımcıları: Banaj verebolo Bok. Basak Muth -Pinor bet make 13 tat ink ad. muhammer Gordes Sizi - in ourld whether Emph sert ACT. 112 117, Nebs sert Girletmah. Stin amonto ar dl. 10000000 Pineskent with Scienterinden Olarey Clierk Mehmetaglar Pinarkeyt mah. Sakini Crei ine of 14



T.C. SAMATI VE TERMOLOJI BARABLIGA	торы	ANTI KATILIMCI İMZA FORMU	<	$\Rightarrow$
Toplant: No: Hol Gündem: Hol Yeri / Tarih S	T-1 kin Bilgilendirilmeri Pinorkant Eski Be	(DOSB AAT Projeer) dedye Binos 1 2	4 (10/202)	3
Curum	Îsim	E-Mail	Telefon	
Penarkant Ortoskulu	Mustafa CAN	. dalan 10 mbo an	1.	18
Anarkent Muhtarles		1	2 134 34	J 57 10
Pinarkent mah. sakini	Fatman Alberte			6
TUMAS	Hotice Ginor	huine une des ancorris		



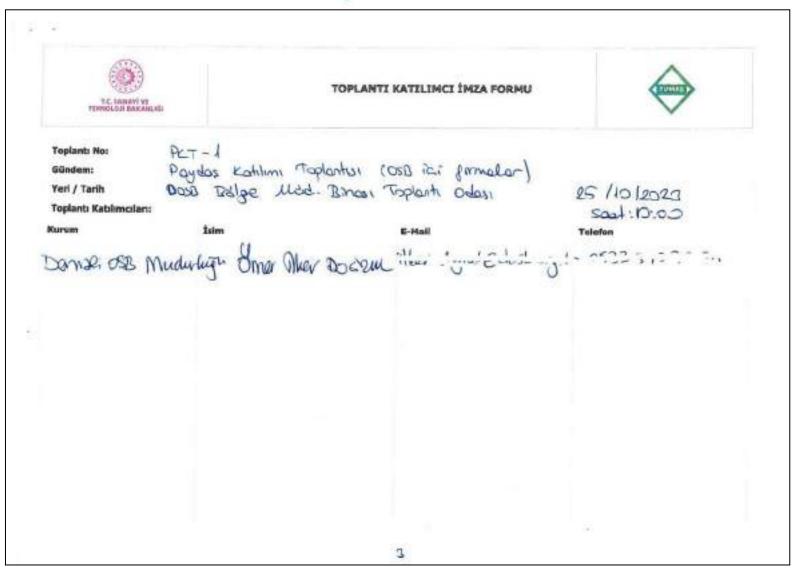
Round Table Meeting - 1





TERNOLOU BARAALIS	TOPLANTI	KATILIMCI İMZA FORMU	
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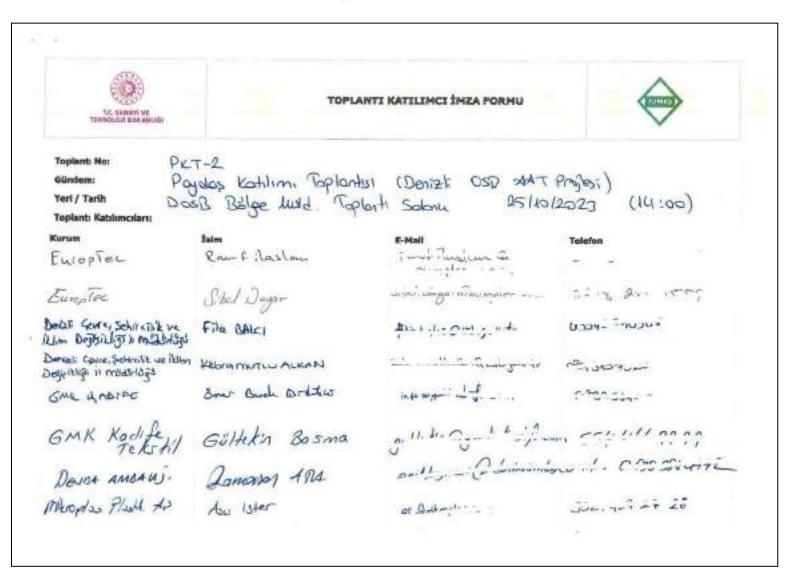




Round table meeting – 2









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# Annex 5: Sample Grievance Tracking Form

۲	Grievance Tracking Form						Rev. No: 01
REL	EVANT DEPARTMENT:						
DATE	The person or organization making the complaint (Gender)		Verbal	Subject / Category	Action	Result	Responsible Person



# Annex 6: Regulatory Requirements

Current regulations that is relevant and directly applicable to the project and stakeholder engagement issues are listed below.

	National Framework	
Name	Information on Regulation	Relevance with the Project
Right of petition, Right to Information and Appeal to the Ombudsperson	(Constitution, Article 74) Citizens and foreigners resident in Turkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and the Grand National Assembly of Turkiye about the requests and complaints concerning themselves or the public.	Citizens and foreigners at the Aol have the right to apply in writing to the MoIT and the Grand National Assembly of Turkiye concerning the requests and complaints concerning themselves or the public.
Law on the Right to Information	(Article 11) "Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains to more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days."	Citizens can request information from MoIT and OIZ. The institutions shall provide the requested information within 15 working days.
The Environmental Impact Assessment Regulation No. 29186 (Article 9)	<ul> <li>(Article 9)</li> <li>1) To inform the investing public, and get their opinions and suggestions regarding the project; a Public Participation Meeting will be accomplished on the date given by the Ministry and Ministry qualification given institution/organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.</li> <li>a) The competency-issued institutions/organizations by the Ministry will publish the meeting date, time and place through widely published newspapers at least ten (10) calendar days before the determined date for the PPM.</li> <li>b) Public Participation meetings will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, and receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of the meeting will be sent to the Ministry, with one copy kept for the Governorship records.</li> <li>2) Governorship will announce the schedule and contact information regarding public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.</li> <li>3) Members of the Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.</li> <li>4) The competency-issued institutions/organizations by the Ministry could provide studies as brochures, surveys and seminars or through the internet to inform the public before the Public Participation Meeting.</li> </ul>	Inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting. Participants raise issues related to the Project. As the Project has EIA exemption, Public Participation Meeting has not held.
	WB ESS	·
Name	Information on Regulation	Relevance with the Project
ESS 10	Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and	Requires a Stakeholder Engagement Plan (SEP). Stakeholders will be engaged throughout the project life cycle



TÜRK MÜHENDİSLİK MÜŞAVİRLİK VE MÜTEAHHİTLİK A.Ş.

	frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.	
ESS 10	Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Stakeholders will be provided information about environmental and social risks and impacts and will be consulted – and particular effort to reach identified vulnerable groups
ESS 10	The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not."	Stakeholders will be informed and reported.