

ÇEŞMELİ – KIZKALESİ HIGHWAY PROJECT
Final Environmental and Social Impact
Assessment (ESIA) Report
NON-TECHNICAL SUMMARY

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ABBREVIATIONS

Abbreviation	
AOI	Area of Influence
BOT	Built Operate and Transfer
CKH	Çeşmeli Kızkalesi Highway
EHS	Environmental and Health Safety
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EPR	Emergency Preparedness and Response
ESMMP	Environmental, Social, Management and Monitoring Plan
KGM	General Directorate of Highways
MoEUCC	Turkish Ministry of Environment, Urbanization and Climate Change
MOI	Ministry of Transport and Infrastructure of Türkiye
NO2	Nitrogen Dioxide
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PM	Particulate Matter
PPE	Personal Protective Equipment
Project Owner / KOLIN	KOLIN İnşaat Turizm Sanayi ve Ticaret A.Ş.
TAG	Tarsus Adana Gaziantep
VU	Vulnerable

1. INTRODUCTION

The Çeşmeli - Kızkalesi Highway Project (hereinafter CKH Project or the Project) is planned for transportation in Mersin Province of Türkiye and developed by the General Directorate of Highways (KGM), which is a governmental organization under the Ministry of Transport and Infrastructure of Türkiye (MoTI).

The Project is a section of the Çeşmeli-Erdemli-Silifke-Taşucu Highway Project, which will be the continuation of the Tarsus-Adana-Gaziantep (TAG) Highway that is currently in operation and provide an uninterrupted transport link between the Mersin, Adana, and Gaziantep as part of the Vision 2023 Masterplan.

The Project has a total length of 52 km, of which:

- 42.24 km is the main road (2×3 lanes),
- 10.93 km is the connection roads (2×2 lanes), and

The highway route starts from the intersection of Çeşmeli Highway with D-400 State Road and ends at Kızkalesi Intersection.

The tender for the construction, operation, and transfer (BOT) of the Çeşmeli-Kızkalesi Section was held on January 19, 2022, by KGM, and Mersin Otoyolu Yatırım ve İşletme A.Ş. ("MOI" or the "Project Company"), which is established by KOLIN İnşaat Turizm Sanayi ve Ticaret A.Ş. ("KOLIN" or the Engineering-Procurement-Construction (EPC) Contractor) has been awarded for the implementation of this Project.

The contract for the CKH Project was signed on December 22, 2021, by MOI. According to the tender contract, the concession period is 16 years, including the 3-year construction phase. The operating rights of CKH will be transferred back to KGM at the end of 16-year contract period.

Pursuant to the Equator Principles (EP 4, July 2020), Principle 1, the project is categorized as a "Category A" project, which is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. Therefore, MOI is required to prepare an Environmental and Social Impact Assessment (ESIA) in accordance with EP 4 and International Finance Corporation (IFC) Sustainability Guidelines, Performance Standards (PSs), and relevant environmental and social (E&S) policies. In order to meet the E&S requirements of the potential lenders, MOI engaged ASSYSTEM Energy and Environment Inc. (ASY), in February 2022 to develop the ESIA report.

ASY prepared the following deliverables and studies as a part of the ESIA studies:

- Scoping Report,
- ESIA Report,
- Non-Technical Summary (NTS),
- E&S Management and Monitoring Plan (ESMMP),
- E&S Action Plan (ESAP),
- Stakeholder Engagement Plan (SEP),

1.1. PURPOSE OF THE NON-TECHNICAL SUMMARY

This Non-Technical Summary (NTS) is prepared to summarize the information on the whole project that exists in Final Draft Environmental and Social Impact Assessment (ESIA) report.

The main purpose of the NTS is to facilitate the understanding of the Project, its components, and backgrounds of public and stakeholders.

1.2. PROJECT NEEDS AND BACKGROUND

The tender for the mentioned in chapter-1 of the final draft ESIA report was carried out with the motivation of Vision 2023 targets which includes expanding of highway/roads and improve the transportation country-wide.

The project is a follow-up of Tarsus Adana Gaziantep (TAG) highway which already exist. As completion of the construction of highway, highway connection with the Mersin-Adana-Gaziantep-Şanlıurfa will be satisfied and especially trade-based transportation will be strengthened.

1.3. TARGETS OF THE PROJECT

By the construction of the Project route, the following targets will be reached:

- Facilitating the traffic jam in D400 State Highway and improve the road safety,
- Shortening of the travel times on the road,
- Due to the less stop-go activities and less durations on the traffic, fuel saving of the vehicles and depending on this less carbon emission,
- Contribution to the development of the tableland tourism in Mersin Province,
- Increasing the touristic visits to the archeological sites, and
- Providing an employment opportunity to the local people.
-

2. INSTITUTIONAL AND REGULATORY FRAMEWORK

The National Environmental Impact Assessment (EIA) studies in line with of National EIA regulations was completed and the EIA Positive decision was obtained from the Ministry of Environmental Urbanization and Climate Change (MoEUCC) on May 23, 2017.

A Final Draft ESIA report have been prepared to assess the positive and negative impacts of the project on physical, biological, and social environments and mitigation measures to be taken are specified for the lifetime of the Project in line with the international standards and guidelines.

The following major national legislations and standards other than EIA regulation are but not limited to:

- Environment Law No. 2872 ,
- Expropriation Law No: 2942 ,
- Traffic Law No. 2918,
- Public Health Law No. 1593,
- Occupational Health and Safety Law No. 6331,
- Conservation of Cultural and Natural Assets Law No. 2863,
- Regulation on Water Pollution Control,
- Regulation on Industrial Air Pollution Control,
- Regulation on Management of Environmental Noise

The following major international legislations and standards are but not limited to:

- PS 1- Assessment and Management of Environmental and Social Risks and Impacts,
- PS-2 Labor and Working Conditions,
- PS-3 Resource Efficiency and Pollution Prevention,
- PS-4- Community Health, Safety and Security,
- PS-5- Land Acquisition and Involuntary Resettlement,
- PS-6- Biodiversity Conservation and Sustainable Management of Living Natural Resources,
- PS-8- Cultural Heritage.

3. DESCRIPTION OF THE PROJECT AND PROJECT COMPONENTS

Project Route:

The Project starts at the Çeşmeli intersection of the D-400 state road (Mersin-Antalya Road) in the Erdemli District and ends at the Kızkalesi intersection of the D-400 state road. The Project route runs about 2 km parallel to the D-400 state road at the north. The connecting roads will link the Project route to D-400 highway from the east and west of Erdemli District.

Settlements Along the Project Route:

The main and connecting roads of the Project will pass through some neighborhoods of Erdemli, Mezitli and Silifke Districts, locations of which are given in Table 3-1.

Table 3-1. Settlements along the Project Route

Km	District	Neighborhood	Distance to the Motorway Corridor (km)	Direction as Reference to the Motorway
1+000	Mezitli	Tece	2.1	Southeast
1+000	Erdemli	Çeşmeli	1.7	Southeast
2+000	Erdemli	Kargıpınarı	2.3	Southeast
4+000	Erdemli	Elvanlı	1.3	Northwest
5+000	Erdemli	Tömük	2.8	Southeast
11+000	Erdemli	Arpaçbaşı	2.7	Southeast
14+000	Erdemli	Kargıcak	2.9	Southeast
15+000	Erdemli	Tabiye	1.6	Southwest
15+000	Erdemli	Alata	3.6	Southeast
16+000	Erdemli	Türbe	1.9	Southeast
16+000	Erdemli	Yüksek	1.1	Southeast
18+000	Erdemli	Koyuncu	0.12	Northwest
21+000	Erdemli	Kocahasanlı	1.9	Southeast
26+000	Erdemli	Limonlu	1.1	Southeast
29+000	Erdemli	Kumkuyu	0.1	Northwest
35+000	Erdemli	Ayaş	1.2	Southwest
38+000	Erdemli	Kızkalesi	1.2	Southwest
40+000	Silifke	Narlıkuyu	2.2	Southwest

Project Components

Including the connection and access roads, the project route will be 52 km in length. The project consists of engineering structures such as:

- tunnels,
- viaducts,
- bridges,
- intersections,
- culverts, and
- operational facilities including the toll booths and service facilities.

Components of the Project are listed in Table 3-2. The Project itinerary and the key components of the route are given in Figure 3-1 and Figure 3-2, respectively.

Table 3-2 Project Components List

Type of the Components	Name of Structures & Facilities	Number
Engineering Structures	Tunnel	7
	Overpass	24
	Underpass	33
	Viaducts	5
	Bridges	7+ 1 (Additional)
	Culverts	73
Operational Facilities	B Type Service Facility	2
	Maintain Operating Service	2
	Tunnel Operation Center	2
	Toll Booth	2

Project Activities

Construction Period

The tender period was finalized in December 2022, and the planning, projection, expropriation periods have been carried out including certain administrative permissions such as forestry, use of blasting material. The project start date is as 2024.

Selection of the route in planning stage was carried out elaborately considering existence archaeological sites, landowners, public properties such as watering canal, mosque, and valuable lands to minimize the environmental and social impacts on the nature and settlement areas.

For the construction period of the Project, the installment of three (3) campsites are planned. The estimated total workforce will be 3,907 workers. During the recruitment stage it will be paid attention to employ the workforce from the local people to provide employment opportunity.

Operation Period

After three (3) years of the construction period, operation of the CKH will start. It was assumed that totally 121,389 vehicles including car, medium trade vehicles, bus, trucks and trailers will pass in 2027 and it is envisaged that that number will increase due to the increase of the population and increasing economical investments in Mersin province.

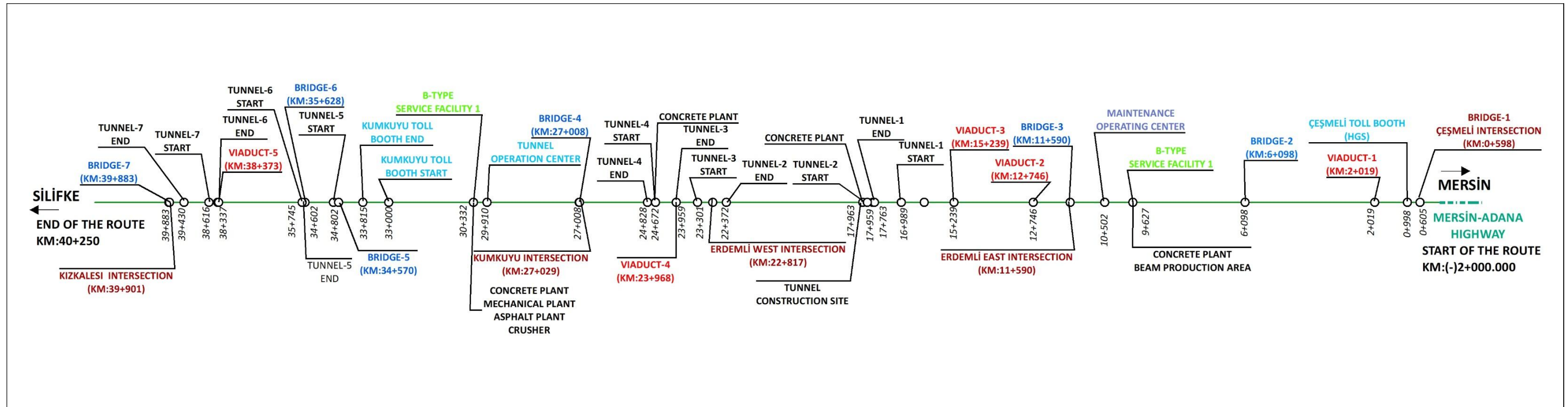


Figure 3-1 Project Itinerary



Figure 3-2 Key Components of the Project Route

4. PROJECT ALTERNATIVES

Following the securing of the EIA Positive decision from the MoEUCC for the Çeşmeli-Erdemli-Silifke-Taşucu Highway Project, some route alternatives were evaluated by considering the archaeological sites, minimization of excavation matter generation as well as expropriation and involuntary resettlement.

The alternative routes listed below were studied and Alternative-1 which has been finally decided and the ESIA studies has been carried out on the basis of Alternative-1.

Alternative-0: The route proposed in the tender period of the project (see Figure 4-1).

Alternative-1: The route which was revised to Alternative-1 considering number of agricultural lands, forest areas, number of land owners, archaeological sites and amount of excavation material (see Figure 4-2). In addition to taking into account environmental, social and biological factors, such as the local population, archaeological sites and landowners' livelihoods, the socio-economic development of Mersin province has been taken into account by facilitating access to settlements, archaeological sites and tablelands along the route, which would result in the development of historical and tableland tourism.

Comparison

Comparison of the base project determined in the tender period (Alternative-0) and finally decided project route (Alternative-1) is given in the Table 4-1.

Table 4-1 Comparison of the Alternative-0 Route (Tender) and Alternative-1 Route and Revisions

No	Subject of Revisions	Revision Location	Reasons	Revisions	Benefits
1	1	Length of Viaduct	0+0.00 KM - 5 +000 KM	The viaduct in question is overlapped with water canals which is used for agricultural activities and forest areas.	Length of the Viaduct will be shortened from 877.5 m length to the 359.6 m and shifted to the 300-350 m southern.
2	2	Shifting of the Route	5 +000 KM - 7 + 000 KM	Destruction of two (2) mosques and their outbuildings would be in question.	The route will be shifted 100 m to the South and Length of the bridge (K1) will be decreased from 187.5 m to 87.8 m.
3	3	Shifting of the Route, Relocation of the Service Facility Area	7 + 000 KM + 14+ 700 KM and Erdemli East Intersection	In various places of the Route, shift of the between 100- 500 m Revision in location of Service Facility Area considering the expropriation cost	In various location of the route, 100- 500 m shift of the route will be in question in order to minimize the number of private lands to be affect from the Project. The location of the nearest service facility area, which was 46 km from the first intersection, was revised between 9 +200 - 10 +400 km. Erdemli Eastern Intersection was designed as trumpet type in the tender route, but the branch roads of the intersection would occupy the natural

No	Subject of Revisions	Revision Location	Reasons	Revisions	Benefits
					protected area. For this reason, the intersection was re-designed as directional type, in this way occupying the protected area of the intersection was avoided.
4	4	Revision of Viaduct Location and Addition of Trumpet Intersection	14+ 700 – 17 +000 KM	There are watering lines for agricultural activities, irrigated farming areas, greenhouse areas and cultural heritage sites	Revision of the location of the viaduct and Trumpet intersection in 16 + 275.324 km will be carried out. Shifting of the routes into the south was decided. Length of the Viaduct-3 was decreased from 314 m to 223.7 m. Connection to the Erdemli- Güzeloluk provincial road will be satisfied with connection at 16 + 175 km.
5	5	Tunnel Construction	17 +000 KM + 25 000 KM	Existence of registered agricultural lands, archaeological lands, watering canals	Cancellation of viaducts in 17 +726.24 km and 23 + 560 km and instead of them, four (4) tunnel construction and relocation of West Erdemli Intersection from 22 + 357.83 km will be carried out.
6	6	Relocation of the Intersection	25 000 KM - 32 000 KM	Existence of registered archaeological sites	Planned intersection in 30 +174.41 km will be constructed in 27 +827.402 km. Earlier planned viaduct in 30 + 036.25 km was cancelled.
7	7	Revision of Engineering Structures	32 + 000 KM - 40.250 KM	Existence of registered agricultural lands, archaeological lands, watering canals of DSI	Construction of Tunnel-5, Tunnel-6 and Tunnel-7 will be in question and cancellation of Viaduct-7, Viaduct-8 and Viaduct -9
8	8	Solar Power Plant installation	Not specified yet	-	-

No	Subject of Revisions	Revision Location	Reasons	Revisions	Benefits
9	9	Construction of Center of Maintain Operation and Highway Service Facility	9 + 200 KM- 10 + 400 KM	Long distance of existing Highway Service Facility to the Project route	Construction of Center of Maintain Operation and Highway Service Facility and second Highway Service Facility will be constructed between 29 + 800 KM- 30 + 900 KM

Summarizing to the reason and Benefits of the Project Route Revision

In more detail, the revised route will avoid the total potential impacts of the Project on archaeological cultural heritage places, greenhouse and agricultural places with high agricultural and economical values, forest areas that are still indicated as forest area and watering structures such as irrigation channels and other engineering structures.

In the early periods of the ESIA process 172 of registered, unregistered and potential cultural heritage assets were identified and in accordance with the Code of protection of Cultural and Natural Properties with 2863 No, 62 of unregistered and potential archaeological assets were reported to the Adana Regional Directorate of Cultural and Natural Properties and 57 of them were identified as places as having cultural property features. Due to this situation, need for revision of the route arised. In addition, as mentioned in the paragraph above, minimization of the damage on the agricultural activities and lands was one of the major motivations for the revision of the route.

Especially, in 12+00 - 14 + 700 km, 14 + 700 km- 17 + 000 km, 17 + 000 km- 25 + 000 km, 25 +000 km- 32 + 000 km and 32 +000 km – 40 +250 km parts of route needed revised due to the existence of the cultural heritage.

After Kizkalesi intersection at 39 +460 km, the planned viaduct with the length of 361.16 m was cancelled and it was decided to fill this part.

Total expropriation area was decreased from 8,295,905.94 m² to 6,068, 972.93 m², and number of structure/building to be affected by the project was decreased from 2,389 to 748.

In terms of decreasing of engineering structure cost and construction activities, the following changes are decided:

- Total length of the bridges are decreased from 546.12 m to 452 m.
- Total length of the viaducts are decreased from 4236 m to 1616.8 m.
- It was decided to increase the number of tunnels to avoid damaging residential areas, agriculture and greenhouse areas.

5. ESIA METHODOLOGY

In characterization of the impact of the Project, the following steps are considered:

Size of the Impact

Wherever possible the size of the impact will be ascribed to a physical measurement. While the size of the impact will be enumerated wherever possible, for the purposes of determining scores for the overall impact severity, the size of the impact, namely the relative change in value is described semantically and then assigned a score for the purposes of overall determination of severity (see Table 5-1).

Table 5-1. Size of the Impact and Assigned Scores

Description	Description	Score
High	Loss of resources and/or quality and integrity over a significant area; severe change/damage to key characteristics, features or elements	8
Medium	Loss of resources, but not adversely affecting the integrity over a significant area; partial loss of/damage to key characteristics, features or elements	5

Description	Description	Score
Low	Some measurable change in attributes, quality, or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements.	3
Negligible*	Little or no measurable change in attributes, quality, or vulnerability	2

* The impact having a size of negligible is considered as Nonsignificant

Extent of the Impact

Extent of impact or AOI relates to the physical extent over which the impact will happen (see Table 5-2).

Table 5-2. Extent of the Impact and Assigned Scores

Extent	Descriptio	Score
Very local	The AOI is highly limited, likely to take place only at the point of impact and not influencing receptors outside of this immediate area.	1
Local	The AOI is contained within the project site or immediate surrounding area.	2
Regional	The AOI extends to a regional scale, affecting areas outside the project site and into the wider environment.	3
National	The AOI extends to national scale.	5
International	The AOI will be cross boundary	7

Duration of the Impact

An impact's magnitude will be increased as its duration increases. It is important to note that the impact duration is not synonymous with the duration of the event causing the impact. The duration is defined as how long the impact will last (see Table 5-3).

Table 5-3. Duration of the Impact and Assigned Scores

Description	Duration	Score
Transient	< 1 day	1
Very short term	1-30 days	2
Short term	1-12 months	3
Medium	1-5 years	5
Long term	> 5 years	7
Permanent	Permanent	10

Frequency of the Impact

The classification of frequency variable and the ascribed scores is shown in Table 5-4.

Table 5-4. Frequency of the Impact and Assigned Scores

Frequency	Description	Score
One off	The event causing the impact occurs only once in the lifetime of the project	1 or 5*
Rare	A rare event in the lifetime of the project	2

Frequency	Description	Score
Infrequent	An event which is expected to occur but not commonly as part of the normal project conditions	3
Frequent	An event which occurs regularly throughout a phase of the project or the lifetime of the project	5
Continuous	An event which by the nature of the project is continuous	7

* For one off events, a score of 1 is ascribed if the event does not lead to a permanent non-reversible impact, if the impact is permanent; a score of 5 is used.

Probability of the Impact

Impact assessment for some issues is based on risk assessment. Not all predicted impacts will occur but should be considered in the assessment process. represents the probability scale and scores.

Table 5-5. Probability of the Impact and Assigned Scores

Probability	Score
Certain	5
High	3
Low	2

Reversibility of the Impact

If an impact can be readily reversed, then its overall magnitude would be considered less if it cannot be rectified. For example, the loss of natural habitats can never be fully reversed due to land use requirement for temporary facilities, but the visual impact of it will be reversed at the end of life when dismantled and removed.

For the Project, 'Yes' or 'No' scale is used with associated scores of 1 and 5, respectively.

Overall Impact Magnitude Scoring

The scoring model results in scores across the range of 9 – 42. The CKH Project ESIA will use the terminology of 'Negligible' (9-16), 'Minor' (17-25), 'Moderate' (26-34), and 'Major' (35-42) to describe the magnitude. The impact magnitudes are presented in Table 5-6.

Table 5-6. Criteria for the Magnitude of Impacts

Probability	Description
Major	Loss of resource and/or quality and integrity, severe damage to key characteristics, features or elements
Moderate	Significant impact on the resource, but not adversely affecting the integrity, partial loss of/damage to key characteristics, features or elements
Minor	Some measurable change in attributes quality or vulnerability, minor loss of, or alteration to, one (maybe more) key characteristic, feature or element
Negligible	No loss, or very minor loss or detrimental alteration to one or more characteristic, feature or element

Sensitivity of Valued Environmental & Social Receptor

The sensitivity of the Valued Environmental & Social Receptor (VER) will be defined for each E&S subject covered in the ESIA study using the general criteria given in Table 5-7. It should also be noted that specific criteria will also be used where applicable in the assessment of E&S aspects of the Project.

Table 5-7. General Criteria used for Determination of Sensitivity of VER

Sensitivity of VER	Physical Receptor	Human Receptor	Biodiversity Receptor
Extreme	Little or no capacity to absorb proposed changes and has national or international value e.g. receptors where people or operations are particularly susceptible to noise or air quality changes).	Receptors with high vulnerability and permanent presence within the direct or indirect AOI (e.g. school, poor or vulnerable household, hospital). No capacity to absorb project changes or no opportunity for mitigation.	Substantial loss of ecological functionality.
High	Moderate capacity to absorb proposed changes e.g. where it may cause some discomfort or distraction or disturbance.	Receptors with moderate to high vulnerability and or somewhat affected by project impacts. Limited capacity to absorb changes. Potential opportunities for mitigation.	Moderate but sustainable change which stabilizes under constant presence of impact source, with ecological functionality maintained.
Moderate	Good capacity to absorb proposed changes and not protected or has low value e.g. receptors where the disturbance is minimal.	Receptors with low to moderate vulnerability or are located in the AOI infrequently. Good capacity to absorb changes with no lasting effects, or good access to mitigation measures.	Species or community unaffected or marginally affected.
Low	No or negligible importance and rarity, site scale. The receiving physical environment is tolerant of the proposed change.	No or negligible importance and rarity, site scale. The receiving human environment is tolerant of the proposed change.	No or negligible importance and rarity, site scale. The receiving biological environment is tolerant of the proposed change.

Assessment of Impact Significance

Two-dimensional matrix (4×4), based on the parameters described in Section 5-2, as “Magnitude of Impact” and “Value/Sensitivity” of the receptor will be used to determine the significance of impact on a scale from “Non-significant (NS)” to “High”.

This matrix is presented in Table 5-8.

Table 5-8. Matrix for Determining the Significance of Environmental Impacts

Magnitude of the Impact	Sensitivity of VER			
	Extreme	High	Moderate	Low
Major	High	High	Medium	Low
Moderate	High	Medium	Medium	Low
Minor	Medium	Medium	Low	NS
Negligible	NS	NS	NS	NS

The terminology used for the significance of environmental impacts are as follows:

- **High:** An environmental impact that has importance at international or national level and is irreversible or unprecedented.
- **Medium:** An environmental impact that has importance at a regional scale and/or one that can be readily reversed with intervention and is limited to the site boundary and immediate surrounding area.
- **Low:** An environmental impact that is only important in a local context, which is readily mitigated, and it occurs only within the boundary of the project.

- **NS:** An environmental effect that is considered NS.

6. ESTIMATED ENVIRONMENTAL AND SOCIAL IMPACTS

6.1. Water Quality

Baseline

Along the project route, other than the small creeks, the following major streams and creeks are intersected:

- Koca Creek in approximately @2+100 km,
- Karakız Stream approximately @6+100 km,
- Kaplanca Stream approximately @12+800 km, ,
- Sorgun Stream approximately @15+300 km,
- Limonlu Stream approximately @24+000 km,
- Karyağdı Creek, approximately @38+400 km,

In the baseline study, from ten (10) locations water samples were collected and analyzed to determine the water quality near the project route between April 18 and 22, 2023. According to the analysis of the water sample, it is concluded that most of the water quality was at a good level.

Impact Assessment and Mitigation Measures in Land Preparation & Construction Periods

The hydraulic design of the engineering structures such as culverts, bridges, viaducts will be carried out properly and in order to avoid flood risks, drainage systems will be constructed and cleaned properly. Discharge of untreated wastewater or hazardous waste to the surface water will not be allowed. Following the implementation of the measures, the residual impact on the water quality is considered “Low”.

Impact Assessment and Mitigation Measures in Operation Period

In order to avoid flooding, drainage systems, stormwater pipelines, perimeter of the culverts will be cleaned regularly and maintain or repairment of the pavement of the road will be carried out in dry days if possible. In fuel oil stations and service areas, soil kits and proper absorbent materials will be kept ready for any spill accident. Following the implementation of the measures, the residual impact on the water quality is considered “Low”.

6.2. Air Quality

Baseline

A baseline survey was carried out by an authorized laboratory team for air sampling in ten (10) locations and PM₁₀, PM_{2.5} and NO₂ parameters were analyzed. According to the measurement results, the concentrations of the PM₁₀ parameters at each point remained below the limit value set by the national regulation, whereas they exceeded the IFC limit values. Evaluating the measurement results in terms of the PM_{2.5} parameter, the concentrations of PM₁₀ and PM_{2.5} at each location exceeded the limit levels determined by the World Bank Group EHS General Guidelines. All the concentrations of the NO₂ parameter at each point are below both national regulation and IFC limit values. According to the Air Quality Modelling study, PM₁₀ and settled dust parameters remain below the limit values of both IFC standards and national standards.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

Due to the construction and land preparation activities (such as excavation, transportation of the excavation and cutting material, blasting) dust will be a major pollutant. Additionally, gaseous emissions from the construction vehicles due to the combustion of the fuel oil will be in question. As indicated in Environmental and Social Management and Monitoring (ESMMP), dust suppression systems in the construction area and crusher, when storing the materials which may cause dust emission, covering the top of them with a canvas, determination and implementation of fuel saving code of conducts, selection of the fuel saving construction vehicles and covering of dust emitting parts of the crushers will minimize the impact of the dust and gaseous pollutant emissions. Following the implementation of the measures, the residual impact on the air quality is considered “Medium to Low”.

Impact Assessment and Mitigation Measures in Operation Period

During the operational phase of the project, dust emissions will not be an issue unless the motorway is reconstructed or repaired. Gaseous emissions will be in question due to the passing vehicles along the highway. Properly roadside planting of the two sides of the highway, regularly maintain of the highway will minimize the impacts of the gaseous emissions in operation period of the Project. Following the implementation of the measures, the residual impact on the air quality is considered “Low”.

6.3. Noise &Vibration

Baseline

A baseline survey was carried out by an authorized laboratory team and 20 points were selected for the background noise measurement in 17.03.2022 and 07.04.2022. As a result of analysis of the noise measurement, it was seen that all the noise levels in measurement points were under the limit value that are determined by World Bank Group Environmental Health Safety (EHS) Guideline and Regulation on Control of Environmental Noise.

Impact Assessment and Mitigation Measures in Land Preparation & Construction Periods

The operation of the construction vehicles and blasting activities will cause noise and vibration during construction and land preparation period of the project. In order to estimate the impact of the project in terms of noise, SoundPlan program was run and the results, considering the location of the central and tunnels construction sites and the distances, the most affected settlement places are Yeşildere, Elvanlı, and Çeşmeli neighborhoods in operation period and Kumkuyu and Erdemli neighborhoods for the construction period of the project.

Installment of the noise barriers, selection of the non-vibratory and less noisy construction vehicles, isolation of the vibrating parts of the machines, avoiding operation of the heavy equipment on idle mode will minimize the impacts of the project in terms of noise.

During tunneling activities and extracting of the excavating and cutting material, due to the geological structure of the ground, blasting activities will need to be carried out. To minimize the impacts of the vibration, blasting pattern will be arranged accordingly in locations near to the settlement areas. Following the implementation of the measures, range of the residual impact on the noise &vibration change from “Not significant” to Low”.

Impact Assessment and Mitigation Measures in Operation Period

Impact of the vibration on the highway in operation phase will not be in question. However, vehicles using the Project route will cause traffic noise. Pavement of the highway by silent asphalt material, installment of the noise barriers in necessary place of the roadside considering the location of the settlement areas and the vegetation of the roadsides will minimize the impact of the noise in operation period of the Project. Following the implementation of the measures, the residual impact on the noise is considered “Low”.

6.4. Land Use, Soil and Geology

Baseline

The project route crosses cultivated agricultural lands, woodlands, orchards, semi-natural areas. The Project activities will have potential impacts on land use characteristics, soil, and geology particularly during land preparation and construction phases including mainly acquisition of the land, removal of the topsoil, driving of the pile earthworks. Once the land acquisition process is completed, vegetation clearance, removal of topsoil and installation of Project components including permanent and temporary facilities will be commenced. These activities will have temporary and permanent impacts on the land use characteristics, soil, and geology of the Project area and its close vicinity.

Potential impacts of the land acquisition resulting in restriction of access to the agricultural lands will be mitigated with the installation of agricultural underpasses and culverts along the Project route. These installations will enable access to agricultural lands.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

A livelihood restoration plan will be developed to avoid loss of income to landowners with livelihood areas along the project route based on the information to be provided by KGM, and culverts and underpasses will be constructed to avoid restriction of the on landowners to their agricultural land. The topsoil will be stored in the locations, and it will be covered with a material to prevent erosion, desiccation, and vegetation growth. To avoid soil contamination, less hazardous materials will be chosen for the construction activities, appropriate control measures will be applied such as secondary containments for liquids, storage tank and piping leak detection where necessary. Implementation of measures defined in Highway Technical Specifications of KGM

and best practices around the world in order to avoid erosion will be carried out. Following the implementation of the measures, range of the residual impact on the land use, soil and geology change from “Medium” to Not Significant”.

Impact Assessment and Mitigation Measures in Operation Period

Repair and maintenance of the highway will be carried out regularly, subsequent to extreme weather conditions. Inspection of the erosion control and prevention structures, soil embankment and slope improvement will be carried out regularly and necessary measures will be taken in necessary in operation period of the Project. Following the implementation of the measures, range of the residual impact on the land use, soil and geology change from “Medium” to Not Significant”.

6.5. Biodiversity

Baseline

During the baseline survey, the following observations are recorded in terms of flora and fauna:

- A total of 597 flora species and subspecies taxa belonging to 91 families,
- Six (6) amphibian species belonging to five ,85) families of bivalves,
- 31 reptile species,
- Total of 194 bird species belonging to 52 families were identified.

Habitat Classification

A total of eight ,88) different habitat types identified which are "B1.1 - Sand beach driftlines", "C3.2 - Water-fringing reedbeds", "F5.2 - Maquis", "G1.1 - Riparian woodland", "H3.2 - Basic and ultra-basic inland cliffs", "I1.2 - Mixed crops of market gardens", "J1.1 - City and town centres" and "J4.2 - Road networks" using EUNIS.

Protected Areas

Limonlu Basin which overlaps the project area from the beginning of the 24th km of the project route to the end of the route, is located in Limonlu (Erdemli) and Susanoğlu (Silifke) neighbourhoods on the coast and the villages of Esenpınar and Kızılsalı in the north. It lies directly on the project route. Within the boundaries of the Important Nature Area, the endemic plant species *Aristolochia krausei*, *Stachys pseudopinardii* and *Verbascum orbicularifolium*, the Silifke spiny mouse (*Acomys cilicicus*), whose distribution and extinction is globally threatened, 7 species of bats (*Rousettus aegyptiacus*, *Rhinolophus ferrumequinum*, *R. hipposideros*, *R. euryale*), *R. mehelyi*, *Myotis blythii*, *Tadarida teniotis*), the Bolkar Uysal snake (*Eirenis aurolineatus*), which is endemic to Türkiye, and the Karagözlü blue butterfly (*Glaucopsyche alexis*), The Mediterranean Ladybird (*Melanargia titea*), the Dark Dragonfly (*Onychogomphus assimilis*), the Yellow-legged Damselfly (*Gomphus davidi*) and the Eurasian Blue Damselfly (*Coenagrion syriacum*) have been recorded.

The closest natural park to the project route is Talat Göktepe Park, which is 3.1 km away from the project route, and the closest KBA is Mersin Hills, which is 800 m away from the project route. Locations of the national and internationally protected areas are provided in Figure 6-1.

The receptors having ecological importance are provided in Table 6-1.

Table 6-1 Receptors of Ecological Sensitivity within and Vicinity of the Project Route

Receptor Name	
Limonlu Basin Key Biodiversity Area (KBA)	General habitats
Mersin Hills	Masques
18 endemic flora species (4 of them are Near Threatened, 14 of them Least Concerned)	1 Aquatic fauna species (Vulnerable)
5 amphibia species (Least Concern)	2 bird species (Vulnerable)
2 Reptilians species (Vulnerable)	6 bird species (Nearly Threatened)
2 bird species (Endangered)	-

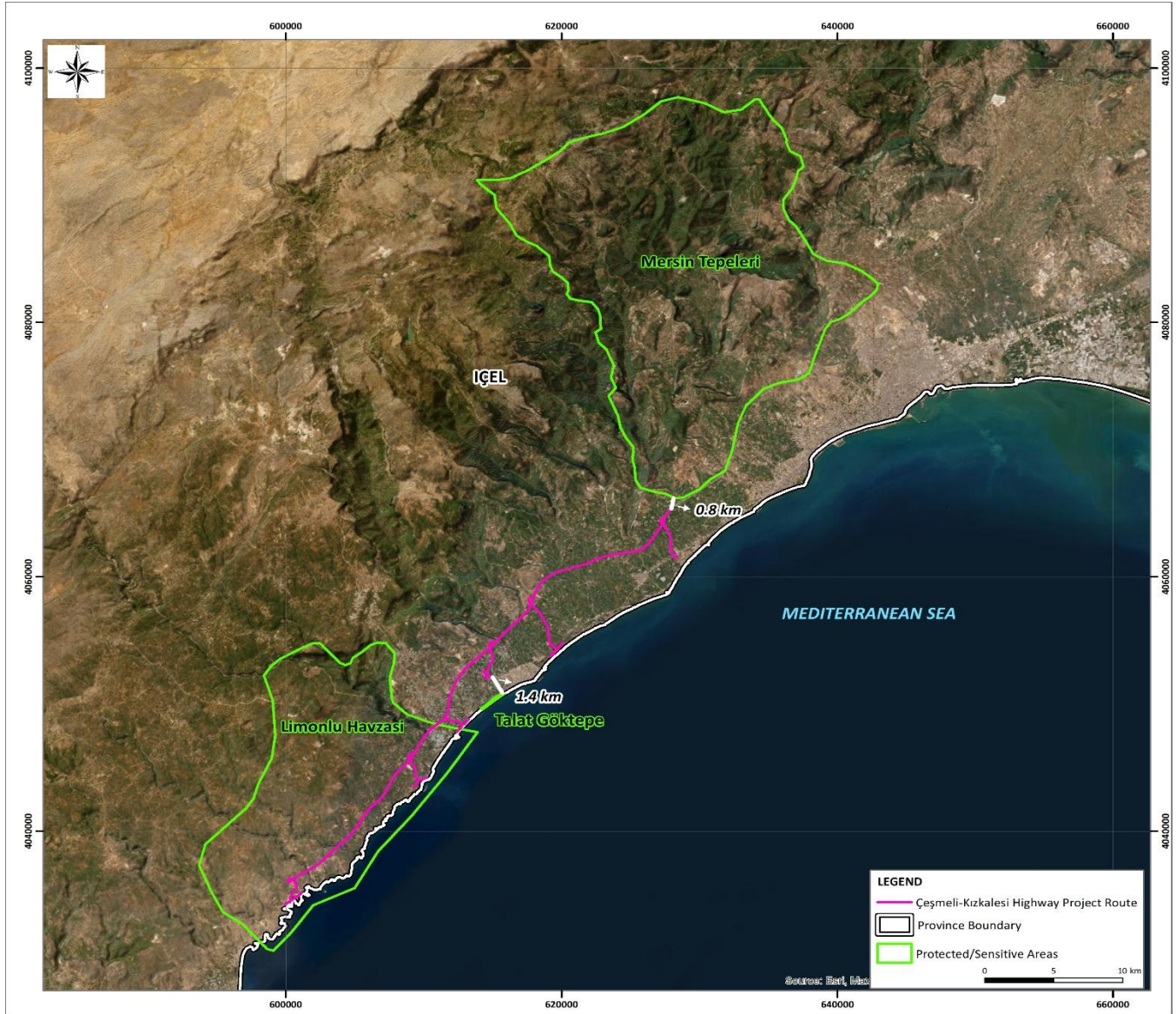


Figure 6-1 Locations of the Projected Areas

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

All the mitigation for waste, wastewater, noise& vibration, air quality will be valid for protection of the biodiversity in construction and land preparation period of the Project. After the construction processes, excavated, piled area will be rehabilitated by the soil. Besides, when carrying earth the earth works, by considering the existence of the endemic species, nests, breeding, wintering of the animals, pass of the animals and protection of the vegetation will be essential. Following the implementation of the measures, the residual impact on the biodiversity is considered “Low”.

Impact Assessment and Mitigation Measures in Operation Period

In case of determining another special habitat for flora & fauna species, warning sign will be established on necessary for entrance restriction and reduction the speed limits on the roadside. Monitoring of the critical habitats will be conducted in line with the Biodiversity Action Plan (BAP) to be developed in the scope of Final ESIA. Following the implementation of the measures, the residual impact on the biodiversity is considered “Low”.

6.6. Visual Impacts

In order to determine the visual impact of the project, a 5 km radius circle was selected as a study area around the centre of the project. Within the study area there are important areas such as archaeological sites, KBA, natural park.

Topography and land use around the project area may change the visibility of the Çeşmeli Kızkalesi Highway and highway components by the dwellings, road users, trains drivers, pilots in aircraft and air traffic controllers. The topography and land use condition are:

- The topography around (potential visual impact area within 10 km radius) the project area is hills and sloping,
- There are high mountains on the horizon line that will prevent the arrival of the sun or affect the arrival time, and
- There are vegetation, trees or forests around the project area that will hinder visibility in some parts,

On order to assess the visual characteristics of the projects, visual simulation studies were carried out. Nine (9) viewpoints were specified along the project route and comparing the existing view of selected points with the proposed view after implementation of the Project, it was seen that no significant change will occur in terms of visual impact.

The following types of visual receptors were selected:

- As a touristic place, Cennet- Cehennem Sinkhole,
- Roadsides,
- Public beach,
- Neighborhoods,
- Public foundation.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

A pre-project preparation will be carried out and the report will be submitted to KGM. Topography, geology, drainage, soil, climate, regional character, water, fauna, natural vegetation and flora, historical and cultural assets will be included in the pre-project.

After approval of the pre-project by KGM, implementation project will be prepared for the planning of amendment and project the landscape features such as vegetation, outdoor use, lightning, plantation etc.

Proper landscaping studies will also be helpful for mitigating the visual impacts. Following the implementation of the measures, range of the residual impact on the Visual impact change from “Low” to Not Significant”.

Impact Assessment and Mitigation Measures in Operation Period

All of the mitigation measures to be taken throughout the land preparation and construction phase of the Project will ensure that no further impacts will be incurred during the operation phase. In addition to above-listed measures, and those that will be developed as the Project proceeds through the preparation and implementation of the detailed Landscape Project, the following list covers measures to be taken to mitigate landscape and visual impacts most of which will be related to maintenance of the constructed Motorway and its associated components and use of lighting. Following the implementation of the measures, range of the residual impact on the Visual impact change from “Low” to Not Significant”.

6.7. Cultural Heritage

Baseline

In order to determine the existence of archaeological sites, an archaeological team carried out a site survey along the project route and its surroundings in 10 May and 17 July 2022, and including registered and unregistered areas, a total of 172 archaeological sites were found. In Erdemli district, 83 registered and 56 unregistered archaeological sites were found and in Silifke district, 20 registered and 13 unregistered archaeological sites were also recorded.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

As general mitigation measures, Visual Archaeological Monitoring will be carried out by monitoring expert,

Preventing intrusion of unauthorized persons, Complying with the official decisions and opinions given by relevant authorities, marking of Archeologically Sensitive Area in the Project/ Construction Drawings, ensuring the security of the archaeological sites in order to prevent stealing of movable properties. Following the

implementation of the measures, range of the residual impact on the cultural heritage change from “Medium” to Low”.

Impact Assessment and Mitigation Measures in Operation Period

Checking of cultural heritage sites regularly and maintain of these places if necessary will be a general mitigation in operation period of the Project. Following the implementation of the measures, range of the residual impact on the cultural heritage change from “Medium” to Low”.

6.8. Waste Management

Baseline

In Mersin province, dump sites used by district municipalities were closed with the enactment of the Law on Metropolitan Municipalities No. 6360. Additionally, 48 irregular storage areas have been identified by PDoEUCC and the provision of the relevant legislation is implemented.

The domestic wastes generated in Erdemli district are transferred to the Silifke Solid Waste Sanitary Landfill located in Silifke district, by transferring them through the solid waste transfer station established in the Limonlu neighborhood of the Erdemli district.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

Excavation and filling materials will be used as raw material for concrete and asphalt production and refilling material. Rest of the excavation materials will be used for landscaping of the areas to be used for solar panels installments. Other wastes to be generated will be stored considering their physical, chemical and hazard conditions properly and sent to the licensed recycling companies in proper conditions.

Impact Assessment and Mitigation Measures in Operation Period

It will be ensured that the motorway is eliminated from illegally dumped litters by performing periodical site observations along the route and take necessary corrective measures.

6.9. Socio Economy

Baseline

During the National EIA process, a public participation meeting was held on October 20, 2016, in Silifke district of Mersin province. Besides, during the ESIA process social field surveys were conducted between May 20 and June 3, 2023. During this study, a total of 29 headmen (corporate stakeholders) were interviewed within the affected settlement. A field sample was conducted with 45 women and 353 men from the communities affected by the project.

Considering the concerns and supports for the Project, a Stakeholder Engagement Plan (SEP) has been developed, which will be implemented during the stakeholder engagement activities along the construction and operation periods of the project.

Project is located closed to 18 neighborhoods as a potentially impacted community. In order to make a baseline information on the local people and understand the concerns and requests of the local people regarding the Project, in May-June 2023, stakeholder engagement studies were carried out.

The construction period of the project will provide a chance to the local people for employment opportunity and this situation will have a positive impact on local people in terms of employment.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

Due to the existence of the private areas, an expropriation process will be held by KGM in the line with the Expropriation Law and a Livelihood Restoration Plan will be developed in final stage of the ESIA process based on the information to be provided by KGM.

Impact Assessment and Mitigation Measures in Operation Period

Due to the expected increase of the entrance to the Mersin province and facilitated access to the archaeological sites and tablelands for the purpose of tourism, popularity of the settlement places and income of the workplaces owners will increase. Besides, construction of the access roads to the settlement places, access to the next neighborhood will be easy. Traffic safety will be satisfied by regularly maintaining the roads and traffic signs will be places properly.

6.10. Occupational Health and Safety and Labor Conditions

Main labor and Occupational Health and Safety (OHS) issues related with the construction of highways in majority includes the following:

- Labor issues and working conditions,
- Workers' accommodation conditions and general OHS issues,
- Physical, chemical, and biological hazards,
- EPR (Emergency Preparedness Response), and
- Workers' GM (Grievance Mechanism).

and the operation of highways in majority includes the following:

- Labor issues and working conditions,
- OHS issues,
- Physical and chemical hazards,
- EPR (Emergency Preparedness Response).

The operation team will be established and be enforced / in execution after the completion of Project's construction phase. The Project Company will develop and implement a Human Resources (HR) Policy as per the Project standards. Furthermore, the Project-specific sub-management plans (i.e. Contractor Management Plan, Supply Chain Management Plan, etc.) will provide the framework for the management of labor related topics according to Project standards.

Project Company itself and/or any of its contractors/subcontractors will not employ any child labor or use forced labour and commit to fully comply with the relevant laws, regulations, recommended practices, and Project standards.

As indicated in final draft ESIA report, KOLIN was awarded a High-Level Gender Equality certificate by an authorized audit company.

Impact Assessment and Mitigation Measures in Construction & Land Preparation Period

A Stakeholder Engagement Plan including GM (Grievance Mechanism) will be implemented. ERP (Emergency Preparedness Response), Contractor Management Plan and Supply Chain Plan will also be developed and implemented. The personnel will be trained on the OHS and it will be ensured that proper Personnel Protective Equipment (PPE) is used by the personnel. It will be ensured that all the equipment will be maintained or repaired regularly. Entrance to restricted places or use of construction vehicles by unauthorized personnel will be avoided. Following the implementation of the measures, the residual impact on the labour conditions and OHS is considered "Low".

Impact Assessment and Mitigation Measures in Operation Phase

First of all, a Traffic Management Plan will be developed and training about this plan and other OHS related issues will be satisfied for the personnel. Maintain of the vehicles used by the personnel will be carried out by an authorized service regularly. Signages for traffic will be installed properly and they will be checked regularly. Following the implementation of the measures, the residual impact on the labour conditions and OHS is considered "Low".

6.11. Cumulative Impact Assessment

In cumulative impact assessments the 2 factors are considered:

- Impacts from the project implementation,
- Impacts from other projects in the vicinity of the sensitive receptors.

By taking reference the Guidance for the Private Sector in Emerging Markets (2013)" published by IFC/WBG, the process for implementing CIA for the Project consists of the bellowing steps:

- Step 1: Scoping Phase I – VECs, Spatial and Temporal Boundaries,
- Step 2: Scoping Phase II – Other Activities and Environmental Drivers,
- Step 3: Establish Information on Baseline Status of VECs,
- Step 4: Assess Cumulative Impacts on VECs,
- Step 5: Assess Significance of Predicted Cumulative Impacts,
- Step 6: Management of Cumulative Impacts – Design and Implementation.

Environmental and social impacts of the Project may be non-significant on a valued environmental and social component, but the same impact may become significant as a result of the CIA process when it is assessed by considering other projects, each of which results in the same impact. For this reason, besides determining the significance of the impacts, sensitivity and tolerance level of the valued environmental and social component and duration of exposure to the impacts are considered.

Considering this approach, cumulative significance impacts of the project, D400 Highway, Çiftapınar Irrigation Dam, Özme Solar Exprolartion, Öz Şimşek Sopar Power Plant, Hisarkale Farmhouse BOTAŞ pipeline project on the valued environmental and social components are followed in the table below:

Table 6-2 Cumulative Impact on Potential Valued E&S Component

VECs	CKH Project	BOTAS crude oil and/or natural gas pipelines	D400 Highway	Çiftapınar Irrigation Dam	Özme Solar Exprolartion	Öz Şimşek Sopar Power Plant	Hisarkale Farmhouse	Cumulative Impact Potential
Limonlu Basın KBA								High
Alata Kumulları KBA								None
Mersin Tepeleri KBA								None
Karyağdı Stream								Low
Lamas (Limonlu) Stream								Low
Sorgun Stream								Low
Kargıcak Stream								None
Karakız Stream								Low
Yassıtaş Stream								None
Koca Creek								None
Fındıklı Creek								None
Unnamed Streams								Low
Arable lands								Low
Çeşmeli								None
Kargıpınarı								None
Elvanlı								None
Tömük								None
Arpaçbahşiş								None
Kargıcak								None
Tabiye								None
Alata								None
Türbe								Low
Yüksek								Low
Koyuncu								Low
Kocahasanlı								Low
Limonlu								None
Kumkuyu								None
Ayaş								Low
Kızkalesi								None
Tece								None
Narlıkuyu								None
Alacaoren Mevkii Ancient Period 1st								None

VECs	CKH Project	BOTAS crude oil and/or natural gas pipelines	D400 Highway	Çiftapınar Irrigation Dam	Özme Solar Exprolartion	Öz Şimşek Sopar Power Plant	Hisarkale Farmhouse	Cumulative Impact Potential
Degree Archaeological Site								
Yemiskumu Kulesi Archaeological Site								None
Seytanderesi (Kocacay Kanyonu) 1st and 3rd Degree Archaeological Site								None
Hisarkale Farmhouse Archaeological Site								None
Kizkalesi Orenyeri (5) 1st Degree Archaeological Site								None
Unnamed 1								None
Kizkalesi Orenyeri (6) 1st Degree Archaeological Site								None
Kizkalesi Orenyeri (7) 1st Degree Archaeological Site								None
Kizkalesi Orenyeri (8) 1st Degree Archaeological Site								None
Sakıztepesi								None
İkioren 2								Low
Boynuinceli 1 Area 1st Degree Archeological Site								None
Cullaliktepe 1st Degree Archaeological Site								None
Miytan Deresi Workshop 1st Degree Archaeological Site								None
Landowners								Low
Livelihoods (ovine breeding, fishery and agriculture, etc.)								Low
Alternative employment opportunities (positive impact)								Low
Increase in commercial, touristic and cultural value of the region (positive impact)								None
Gas, electricity, telecommunication								Low
Improved transportation (positive impact)								-None

7. ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING

In the scope of the ESIA studies, an Environmental and Social Management Plan (ESMP) has been developed for:

- Overviewing the essential environmental and social risks, impacts and sensitive receptors to be affected by the Project,
- Guiding to manage the environmental and social risks in compliance with the national and international standards and policies for Environmental, Health and Safety,
- Drawing up the mitigation measures and management procedures to be followed,
- Specifying the roles and responsibilities of the project owner and subcontractors,
- Easily ensuring the continuity of the review of the project activities on the basis of performance data and feedback, as a live document, and corrective and proactive actions, and
- Early awareness of corrective and proactive actions to be taken, when required.

8. GRIEVANCE MECHANISM

An internal and external grievance mechanism will be developed to respond the concerns and complaints of the local people and workers properly in time. An example Grievance is given in Figure 8-1.

Grievance Mechanism for Workers:

Project Company will develop a specific workers' grievance mechanism (GM) to secure and ensure workers have a tool to raise their concerns/complaints which is traceable and results are transparent.

Grievance Mechanism for the Local People:

Since the Project activities have E&S risks and impacts on community, they will have complaints, requests, and suggestions regarding the Project. It is important to respond to these reactions in an appropriate way and ensure effective management of them through an effective GM in terms of business success.

Project Company Complaint/Claim Registration Form		
Form Filled By:		Complaint/Claim Registration No.:
Type:	Complaint:	Demand:
Date of registration: Complaint/Request Filing Date:		Date of Notification to the Applicant:
Contact Information of the Complainant/Claimant		
Stakeholder Type:		
Name & Surname:	Phone:	Mobile phone:
Soot:	Address:	Email:
Notification Type:		
Petition (to the company)	Email	Web page
Telephone petition (3rd institution-Organization, Name)	CLO	
Consultations (site visits, etc.)	Contractor	
Subcontractor	Other	
Complaint/Claim Type:		Environmental Social
Relevant location:		
Subject of the Complaint:		
a. Traffic	i. Working conditions	
b. Dust	j. Contractor activities	

c. Waste	k. Land access
d. Pollution (water or soil)	l. Security
e. Damaged crops (or land)	m. Health and Safety
f. Land acquisition	n. Damaged infrastructure
g. Asset acquisition	o. Procurement
h. Noise	p. Other
Subject of Request:	
Summary Information:	
Evaluation of the request (CLO):	
Related Unit:	Date of Referral to the Relevant Unit:
HSE	Administrative Affairs
Site	HR Finance
Security	Contractor
Other	
Opinion of the unit evaluating the request:	Response Date of the relevant unit:

Figure 8-1 Project Company Claim/Compliant Registration Form