

ÇEŞMELİ – KIZKALESİ HIGHWAY PROJECT ESIA Report

SEP



ULAŞTIRMA VE ALTYAPI BAKANLIĞI
KARAYOLLARI GENEL MÜDÜRLÜĞÜ

EPC Yüklenicisi/ EPC Contractor



PROJE/ PROJECT

MERSİN ÇEŞMELİ-KIZKALESİ HIGHWAY PROJECT

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Abbreviations & Definitions

Contractor	Kolin Construction Tourism Industry and Trade Inc. (EPC) Contractor
CLO	Community Liaison Officer
CKH	Çeşmeli - Kızkalesi Highway
BOT	Build-Operate-Transfer
ROPE	Business Policy
CLO	Community Liaison Officer
NGO	Non-Governmental Organization
EIA	Environmental Impact Assessment
EP	Equator Principles
EP4	Equator Principles 4 (Revision of July 2020)
EPC	Engineering Procurement Construction
EPFI	Equator Principles Financial Institutions
MOI	Mersin Highway Investment and Operation Inc.
ESIA	Environmental and Social Impact Assessment
E&S	Environmental and Social
IFC	International Finance Corporation
KGM	General Directorate of Highways
DSI	General Directorate of State Hydraulic Works
LRP	Livelihood Restructuring Plan
LC	Land Consolidation
HR	Human Resources
HES	Health& Safety, Environment, Social
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoAF	Ministry of Agriculture and Forestry
UHB	Ministry of Transport and Infrastructure
PC	Performance Conditions
Project Company	Mersin Highway Investment and Operation Co. Inc. (MOI)
Project Owner	General Directorate of Highways (KGM)
PS	Performance Standards
QHSEM	Quality, Health, Safety and Environment Manager
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
KOBI	Small and Medium Business
TRGM	General Directorate of Agricultural Reform

TEMA	Turkish Foundation for Combating Erosion, Reforestation and Protection of Natural Habitats
TMMOB	Union of Chambers of Architects and Engineers of Türkiye
TOBB	Union of Chambers and Commodity Exchanges of Türkiye
JD	Job Description
UN	United Nations
UNECE	United Nations Economic Commission for Europe
YOL-İŞ	Roads, Buildings and Construction Workers' Union of Türkiye

This document is the public version of the Stakeholder Engagement Plan. Certain information/images have been removed for the protection of personal data, and the document is shared in accordance with the principle of transparency, while preserving its scope, objectives and fundamental commitments.

1 INTRODUCTION

This Plan presents the Stakeholder Engagement Plan (SEP) for the 'Çeşmeli - Kızkalesi Highway Project' (hereinafter referred to as 'CKH Project' or the 'Project') and has been prepared by Assystem Energy and Environment Inc. (ASE) on behalf of Mersin Otoyolu Yatırım ve İşletme A.Ş. (hereinafter referred to as "MOI" or the "Project Company").

CKH Project is a section of the Çeşmeli-Erdemli-Silifke-Taşucu Highway Project that is planned for transportation in Mersin Province of Türkiye and developed by the General Directorate of Highways (KGM).

KGM has decided to implement the CKH Project in accordance with the provisions of the Law on the Implementation of Some Investments and Services under the Build-Operate-Transfer (BOT) Model (Law No. 3996) and its Implementing Regulation. The tender for BOT of the Çeşmeli-Kızkalesi Section was held by KGM, and MOI, Project Company has been awarded for the implementation of this Project.

The Project has "Environmental Impact Assessment (EIA) Positive" decision that was issued by the Ministry of Environment, Urbanization and Climate Change on May 23, 2017. On the other hand, pursuant to the Equator Principles (EP 4, July 2020), Principle 1, the project is categorized as a "Category A" project.

Since the Project Company, MOI, is considering international finance for the implementation of the CKH Project and given that the Project is a Category A project, MOI is required to prepare an Environmental and Social Impact Assessment (ESIA) Report and also this SEP in accordance with EP 4 and International Finance Corporation (IFC) Sustainability Guidelines, Performance Standards (PSs), and relevant environmental and social (E&S) policies.

The SEP is a specific action plan that identifies stakeholders, who need to be effectively involved in the project and receives their views, needs and contributions. This SEP is intended to identify all stakeholders of the CKH Project and create an effective strategy throughout the development and lifetime of the project. The stakeholder engagement is an active and continuous process and accordingly, this SEP is a living document, and it will be regularly monitored, reviewed, and updated by the Project Owner, who is committed to implement this SEP throughout all phases of the Project.

2 PURPOSE AND SCOPE OF THE SEP

Stakeholder engagement includes the active participation and interaction of stakeholders in the decision-making processes, policymaking or implementation of project or organization. Stakeholders can represent any group or individual, who may be or may be influenced by the outcome of the project. For this reason, stakeholders are often people, institutions or communities that are involved in or around the project, that may be involved or affected.

The main objective of stakeholder engagement is to build and maintain a constructive relationship with stakeholders throughout the entire life cycle of the project. The engagement process, initiated in the early stages of the project, not only provides timely public access to all relevant information, but also enables stakeholders' views to be considered in the decision-making process.

Furthermore, for all Category A and Category B Projects, the Equator Principles Financial Institutions (EPFIs) require the client to demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with affected communities, workers and, where relevant, other stakeholders. The client will tailor its consultation process to: the risks and impacts of the project; the project's phase of development; the language preferences of the affected communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups.

The SEP objectives of the CKH Project are as follows:

- **Identifying Stakeholders:** The plan identifies all the stakeholders, both direct and indirect, together with the other interested parties and disadvantaged/vulnerable individuals or groups, who can impact the project or can be impacted by the project and clearly identifies, who those stakeholders are.
- **Participatory and Inclusive:** The plan aims to design and implement the project in a more participatory and community-friendly way by taking the views, needs and contributions of stakeholders.
- **Stakeholder Roles and Terms of Participation:** The plan clearly defines the roles for the implementation of the SEP and terms of participation of the stakeholders involved in the project so that everyone's responsibilities and contributions are clearly understood.
- **Communication and Guidance:** The plan aims to guide the communication with stakeholders throughout the construction and operation phases of the project, thus ensuring effective cooperation and maintaining a constructive relationship with all stakeholders through a well-organized approach.

This SEP is designed to build meaningful and trusting relationships with the local community and other interested stakeholders based on a transparent and timely supply of information and open dialogue. This plan is prepared by ASE in accordance with EP 4 and International Finance Corporation (IFC) Sustainability Guidelines, Performance Standards (PSs), and relevant E&S policies.

SEP covers the following issues:

- Applicable national and international regulations and standards on stakeholder engagement,
- Previous stakeholder engagement activities conducted up to date,
- Identification and analysis of project stakeholders and the nature of stakeholders' interests and concerns related to the project,
- Strategy and methods for consultation and information disclosure,
- Program and timetable for stakeholder engagement activities,

- Roles and responsibilities for the implementation of the SEP,
- Grievance mechanism for stakeholders to raise concerns, provide feedback and comments about the project activities and to detail how complaints/comments will be handled,
- Means of monitoring and reporting of SEP implementation.

3 PROJECT DESCRIPTION

3.1 Description of the Project

CKH Project is planned for transportation in Mersin Province of Türkiye and developed by KGM, a public institution affiliated to the Ministry of Transportation. The Project is a section of the Çeşmeli-Erdemli-Silifke-Taşucu Highway Project (herein after “CKH Project” and “the Project”), which will be the continuation of the Tarsus-Adana-Gaziantep Highway that is currently in operation and provide an uninterrupted transport link between the Mersin, Adana, and Gaziantep.

KGM has decided to implement the CKH Project in accordance with the provisions of the Law on the Implementation of Some Investments and Services under the Build-Operate-Transfer (BOT) Model (Law No. 3996) and its Implementing Regulation. Accordingly, KGM issued a tender for “Çeşmeli-Erdemli-Silifke-Taşucu Highway Project, Çeşmeli-Kızkalesi Section on January 19, 2022, and MOI 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 CKH 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.

CKH Project route starts from the intersection of Çeşmeli Highway with D-400 State Road and ends at Kızkalesi Intersection at Km: 40+250.000 by running 2 km parallel to D-400 State Road at the north (see Figure 3-1). The connection roads will link the CKH route to D-400 State Road from the east and west of Erdemli District and CKH route will be completed with a connection road to Kızkalesi.

The intention of CKH Project is to accommodate most of the transit traffic currently flowing on the existing roads and thereby, to reduce traffic volume on the state roads, particularly during the summer months when traffic density is higher due to touristic activities. Another objective of the Project is to provide a high standard, comfortable, safe and shorter transportation. The total length of CKH Project 52 km, of which 41 km is the main road, 11 km is the connection road and other side roads.

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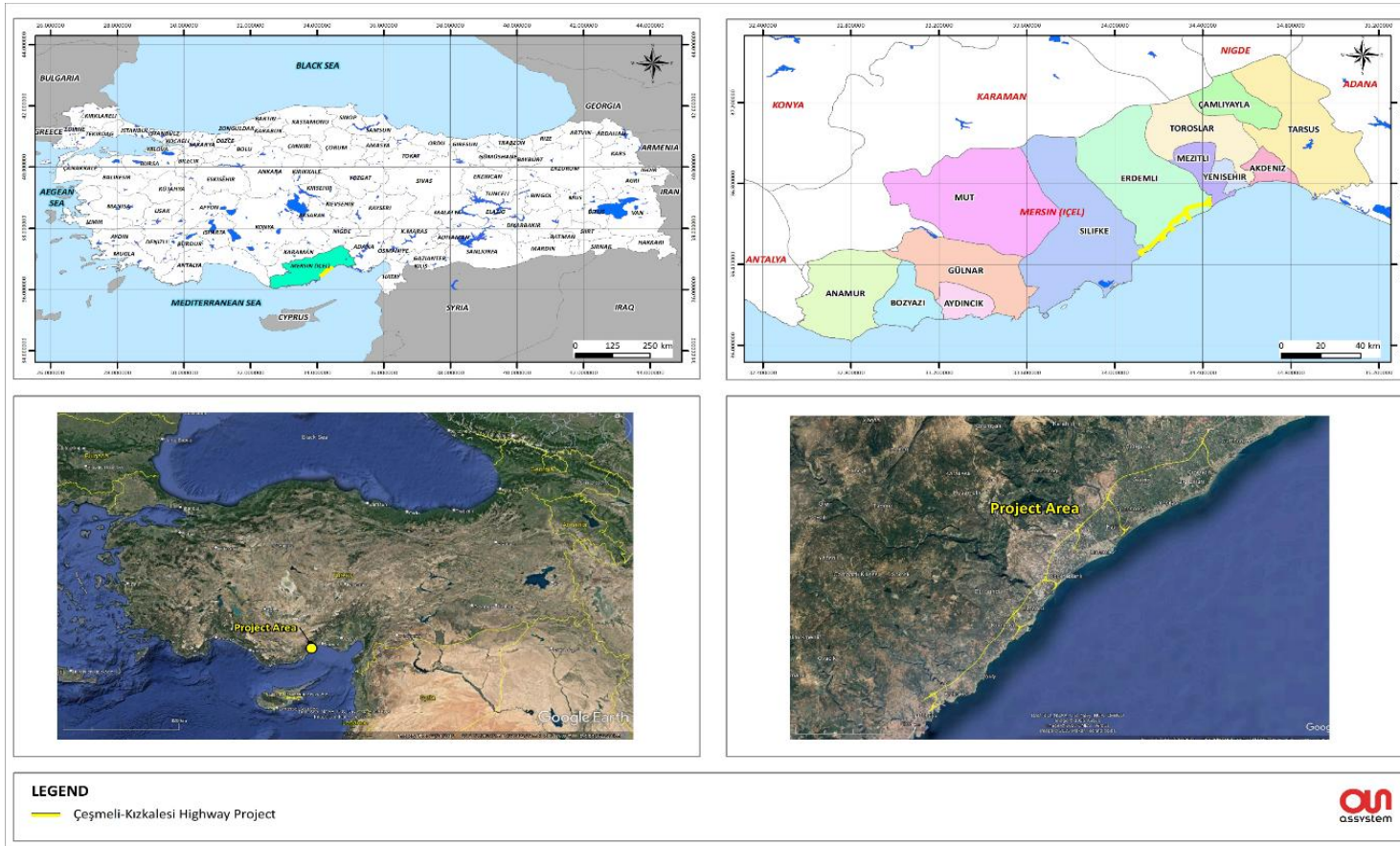


Figure 3-1 Main Road and connection lines (Source: ESIA of the Project, 2024)

The major components of the CKH Project are as follows:

- Engineering structures, including intersections, overpasses, underpasses, viaducts, bridges, tunnels, culverts, and
- Service facilities including highway toll connection system and service areas.

The main and connecting roads of the project will pass through the neighbourhoods of Erdemli, Mezitli and Silifke districts. These neighbourhoods are presented in Table 31, along with their distances from the motorway corridor and their populations as provided by the Turkish Statistical Institute's 2023 Address-Based Population Registration System.

Table 3-1 Settlements Along the Project Route

Km	District	Neighbourhood	Distance to Highway Corridor (km)	Population (2023)
1+000	Mezitli	Tece	2.1	1,473
1+000	Erdemli	Çeşmeli	1.7	5,725
2+000	Erdemli	Kargıpınarı	2.3	14,137
4+000	Erdemli	Elvanlı	1.3	2,332
5+000	Erdemli	Tömük	2.8	12,421
11+000	Erdemli	Arpaçbahşiş	2.7	7,567
14+000	Erdemli	Kargıcak	2.9	1,745
15+000	Erdemli	Tabiye	1.6	1,811
15+000	Erdemli	Alata	3.6	15,147
16+000	Erdemli	Türbe	1.9	2,697
16+000	Erdemli	Yüksek	1.1	2,331
18+000	Erdemli	Koyuncu	0.12	6,903
21+000	Erdemli	Kocahasanlı	1.9	4,789
26+000	Erdemli	Limonlu	1.1	2,932
29+000	Erdemli	Kumkuyu	0.1	2,789
35+000	Erdemli	Ayaş	1.2	2,592
38+000	Erdemli	Kızkalesi	1.2	1,870
40+000	Silifke	Narlıkuyu	2.2	2,464

For socio-economic impacts, the Project Impact Area (PEA) has been selected to cover all settlements within 1 kilometre (total 2 km) of the highway. This scope covers areas where direct impacts (such as land acquisition, noise and visual impacts) are likely to be observed.

The number of construction workers is expected to be around 3,907 during the peak period, while the workforce is projected to be around 12 during the operational phase. Three construction camp areas are planned to be established in the Tömük, Kumkuyu and Kızkalesi neighbourhoods of Erdemli District.

The highway route and connecting roads mostly pass through agricultural land (irrigated and non-irrigated), greenhouses, and forested areas, including forests. All necessary procedures related to expropriation are carried out by the General Directorate of Highways (KGM) in accordance with the provisions of the Expropriation Law (Law No. 2942), and the Ministry of Transport (MOİ) is obliged to submit an inventory of assets to the KGM.

There are no national parks, special conservation areas, RAMSAR sites, or wetlands of national or local importance within the project area or its impact area. With regard to internationally recognised areas, the project route only enters the Limonlu Important Biodiversity Area from Km: 23+276 to the end of the route.

The EIA study entitled 'Çeşmeli-Erdemli-Silifke-Taşucu Highway Project', covering both the motorway and connecting roads, including the CKH section, has been completed in accordance with the Turkish EIA Regulation. The Ministry of Environment, Urbanisation and Climate Change issued a 'Positive EIA' decision on 23 May 2017.

On the other hand, according to Principle 1 of the Equator Principles (EP 4, July 2020), the CKH Project has been categorised as a 'Category A' project, which is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. Considering the project's categorisation and the fact that the MOI is considering providing international financing for the implementation of the CKH Project, the MOI must conduct environmental and social (E&S) impact and risk assessment studies and prepare an E&S Impact Assessment Report and related plans, including this PKP. To meet the E&S requirements of potential lending institutions, the MOI has appointed ASE to carry out the E&S impact and risk assessment studies.

Pursuant to Article 69 of the Law on the Appointment of Personnel Responsible for the Construction, Maintenance and Operation of Access-Controlled Roads Outside the General Directorate of Highways (Official Gazette No. 21552 dated 01.03.1993) pursuant to Article 69, the necessary expropriation procedures for road-related service facilities are carried out by the General Directorate of Highways.

The General Directorate of Highways (KGM) is the owner of the CKH Project. It is a public institution under the auspices of the Ministry of Transport and Infrastructure (UAB) with a special budget for financing, responsible for the planning, design, construction, maintenance and operation of motorways, state and provincial roads. This institution also sets standards for the construction, repair, and maintenance of the road network and updates the relevant national technical specifications. KGM's responsibilities within the scope of the CKH Project's construction include:

- Control of design work,
- Control of construction work,
- Legal procedures for expropriations within the scope of the project.

The General Directorate of Highways (KGM) has implemented a Public-Private Partnership (PPP) model as an alternative financing model for this project, executing the contract for the design, construction and operation of the motorway. At the end of the 16-year contract period, CKH will be transferred back to KGM. The Project Company, as a subsidiary of KOLIN, is responsible for the implementation of the CKH Project. Therefore, the responsibility for implementing the RAP also lies with the Project Company.

4 NATIONAL AND INTERNATIONAL REGULATIONS AND STANDARDS

4.1 National Legislation

There are a number of laws and legislative articles addressing the issue of stakeholder engagement in Türkiye. These articles regulate the rights and participation of stakeholders in processes such as public projects and environmental impact assessment.

First of all, the Constitution of the Republic of Türkiye is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion. The relevant articles are as following in particular:

- **Article 10:** "Everyone is equal before the law regardless of distinction as to language, race, colour, gender, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality."
- **Article 25:** "No one shall be compelled to reveal their thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions."
- **Article 26:** "Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or pictures, or through other media, individually or collectively. This freedom includes receiving or imparting information or ideas without interference from official authorities. This provision shall not preclude subjecting transmission by radio, television, cinema, or similar means to a licensing system."
- **Article 74:** "Citizens and foreigners residing in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye about the requests and complaints concerning themselves or the public."

The main Turkish Regulation requiring public consultation and stakeholder engagement for projects is the EIA Regulation. The 1st Clause of the 9th Article of the Turkish EIA Regulation defines the stakeholder consultation process. In accordance with the related article, it is the legal responsibility of a project owner to organize an official Public Information and Participation Meeting for the Projects that are included in Annex 1 of the Regulation. The date and place are determined in agreement with the Ministry of Environment, Urbanization and Climate Change (MoEUCC) and will be announced in both local and national newspaper at least 10 calendar days in advance. The aim of the Public Information and Participation Meeting is to inform people who may be potentially affected by the project and to understand their concerns, opinions and suggestions about the project.

Furthermore, with the intention to inform the public about the project and its effects and to receive the public's opinions and suggestions regarding the project, it is requisite to prepare a SEP by institutions/organizations qualified by MoEUCC. The prepared SEP is submitted as an attachment to the EIA Application File to be submitted to MoEUCC. During the EIA process, if MoEUCC decides on the requirement to inform the public further, additional work such as distributing informative brochures, conducting surveys, seminars, or sharing information by creating a website about the project can be asked from the qualified institutions/organizations. Additionally, this plan is updated during the EIA process if requested by MoEUCC.

Moreover, MoEUCC and the governorships are responsible for informing the public that the review period of the EIA Report is started via announcements using local and national media, boards, internet etc. Thus, public will be able to access the EIA Report from the web site of the MoEUCC or the relevant Provincial Directorate and comment on the report. Those comments are reviewed in the Review Commission meeting and the results are reflected in the EIA Report.

Apart from environmental laws, MOI is also obliged to follow the following laws considering stakeholder engagement:

- Labour Law No. 4857, Official Gazette No. 25134 dated 10 June 2003
- Law on Right of Petition No. 3071, Official Gazette No. 18571 dated 10 November 1984
- Law on the Right to Obtain Information No. 4982, Official Gazette No. 25269 dated 24 October 1984
- Law on Protection of Personal Data No. 6698, Official Gazette No. 29677 dated 07 April 2016.

4.1.1 Land Acquisition and Resettlement

According to Article 46 of the Constitution; State and public legal entities are authorized to expropriate all or part of the immovable properties in private property and to establish administrative servitudes on them, in accordance with the principles and procedures set forth by law, provided that the public interest requires payment in advance. The main laws and regulations regarding the implementation of land acquisition are as follows:

- **Expropriation Law No. 2942,**
- Settlement Law No. 5543,
- Turkish Civil Code No. 4721,
- Cadastral Law No. 3402,
- Forestry Law No. 6831,
- Environmental Law No. 2872,
- Municipality Law No. 5393,
- Village Law No. 442.

Any expropriation in Türkiye must comply with **Expropriation Law No. 2942**. In cases where the public interest requires it, the law determines the procedures for the expropriation of real and private legal entities by the state and public legal entities, expropriation cost calculation methods, registration of the immovable property and the right of way in the name of the administration, and resolution of related disputes. These provisions of the law are also applied in expropriations made on behalf of real and private legal entities. Unlike purchasing transactions, the consent of the owner of the immovable property to be expropriated will not be sought. Expropriation involves the compulsory allocation of immovable property by the State for the public good. The steps followed in the expropriation procedures carried out by the KGM are as follows:

Project design and determination of expropriation boundaries:

- Project approval and public interest decision,
- Preparation of expropriation plans,
- Identification of property owners and address investigation.

Transactions during expropriation:

- Establishment of valuation commission and valuation process,
- Establishment of conciliation commission and purchasing process.

A Public Benefit Decision is necessary for expropriation of any property, and this must be approved by the Governor, unless the development is carried out in accordance with an approved Development Plan or Special Plan or Project approved by the relevant Ministries or the President. In these cases, a Decision is taken indicating that the expropriation process will be initiated by the authorized executive body. Acts of expropriation can only be exercised on immovable assets.

There are several steps in the expropriation process including:

- Commencement of expropriation process with the issuance of Public Benefit Decision;
- Preparation of expropriation plans;
- Identification of property owners and their addresses;
- Issuance of expropriation decision;
- Purchasing process (article 8 of the Expropriation Law) that includes:
 - Establishment of a “Valuation Commission” and the valuation process: The authority carrying out the expropriation appoints a Valuation Commission to determine the value of the property;
 - Establishment of a “Negotiation Commission”: The authority carrying out the expropriation appoints a Negotiation Commission to negotiate the amount of compensation and execute and complete the purchase by solving possible disputes on expropriation value;
 - Notification to the property owner: The authority carrying out the expropriation notifies the property owner by official registered letter of their intention to acquire the property or to offer a replacement property. At this stage the valuation is not given and there is an opportunity for the owner to agree a price or a suitable replacement property by negotiation;
 - Application to the authority by the property owner: If the owner is willing to sell the property, he (or his authorized representative) can apply to the authority within fifteen days and negotiations are held at a date determined by the Negotiation Commission. Provided the agreed price or the value of the exchange does not exceed the valuation, a minute of agreement is issued and signed by the property owner or his representative and the members of the Negotiation Commission;
 - Payment to the property owner: The authority prepares the payment within forty-five days as of the date of the minute of agreement, and after the completion of the ownership transfer, the payment is made to the property owner. The property is considered to be purchased by expropriation and the property owner has no right of objection against the expropriation or the agreed compensation.

In cases when the purchasing process as per article 8 of the Expropriation Law does not result in an agreement, judicial process is implemented as per article 10 of the Expropriation Law that includes:

- Determination of the expropriation value by the court: The authority carrying out the expropriation applies to the local civil court of first instance and request determination of the value of the property and its registration in the name of the authority. The court notifies the property owner of the date of hearing within 30 days as of the date of application by the authority. If the previous searches have not identified the owner's address the hearing date must be announced in a local and a national newspaper.
- Reaching an agreement: On the date of the hearing, the judge invites the parties to agree on the value of the property and if the parties agree, the judge accepts the agreed value as the expropriation value. The payment is then made to the property owner.
- Disagreement: In cases the parties fail to reach an agreement, the court sets a date for an on-site survey to be undertaken by an Expert Commission consisting of independent experts, within 15 days, and a new hearing date within 30 days. The headmen of the village/neighborhood areas also invited to participate in the site survey. The Expert Council reports the value of the property to the court within 15 days following the on-site survey. The court then sends this report to both parties. If the parties still cannot reach an agreement on the hearing date, a new expert council, if required, is appointed by the court, to finalize the situation within 15 days. The court then sets a fair expropriation value (for the property, resource of right of easement) based on the expert reports. Both sides still have the right to appeal to the "Supreme Court" about the valuation. The property ownership transfer and payment of expropriation compensation are completed within 15 days in line with the decision of the court.

Expropriation Law also includes provisions for **urgent expropriation** of properties as defined in article 27 of the said law. Article 27 of the Expropriation Law indicates the following:

- In cases where there is a need or urgency of defending the country in the implementation of National Defense Liability Law (Law no: 3634) to be determined by the President or for extraordinary situations anticipated by particular laws, the property can be expropriated by the court within seven days upon the request of the relevant administration, with the condition that all processes except the valuation of the property to be completed later.
- Within seven days, the value of the property to be determined according to article 10 of the Expropriation Law (i.e. judicial process as explained above) by experts to be selected according to article 15 of the Expropriation Law, **is paid to the bank account** stated in the invitation and notice to be made in line with article 10 of the Expropriation Law, and the property is expropriated.

In accordance with the relevant provisions of the Expropriation Law, expropriation works for the Project is conducted by the KGM as the related administrative authority/responsible agency. Kolin will have the responsibility to comply with international standards and Lender's requirements regarding the execution of expropriation works.

4.2 International Standards/Requirements

The proposed project aims to achieve compliance with international standards. This document is based on the guidelines of the current IFC Performance Standards. When a project and project owner receive project financing from IFC or another financial institution that has accepted the requirements of the IFC, they must adhere to the IFC Performance Standards throughout the relevant project. As of January 1,

2012, the following eight IFC Performance Standards are considered applicable to all processes of the project:

- Performance Standard 1: Social and Environmental Assessment and Management System
- Performance Standard 2: Work and Working Conditions
- Performance Standard 3: Pollution Prevention and Reduction
- Performance Standard 4: Public Health, Safety and Security
- Performance Standard 5: Land Purchases and Forced Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage

PS 1 emphasizes stakeholder involvement to assess the social and environmental impacts of a project, identify its risks and opportunities, disclose information about the project, negotiate with local communities, and manage community and environmental performance throughout the project lifecycle. The objectives of this standard are:

- Identification and assessment of social and environmental impacts in the project's sphere of influence, whether positive or negative.
- Prevention or minimization of adverse effects, if possible, compensation if they cannot be prevented.
- Ensuring that affected communities are properly involved in their problems.
- Encouraging companies to use management systems effectively to improve their social and environmental performance.

As an important step towards making environmental and social impact information publicly available and accessible, the ESIA report and summary should be made publicly available during the review process and at least 30 days prior to the final commitment to receive formal support. Project information should include details such as the project name, location, project description, contact information, and environmental and social impact information.

International financial institutions have adopted a variety of policies and procedures to assess and manage the environmental and social impacts of projects. These policies and requirements are generally based on the World Bank Group's Collateral Policies. Environmental and social policies and standards developed by the IFC aim to ensure the sustainability and environmental and social responsibility of projects. For this reason, large international private banks have also adopted these standards with the aim of promoting the environmentally and socially appropriate development of projects to be financed. These standards play an important role in the process of evaluating and financing projects.

Other specific policies/documents relevant to the Project are listed below:

- World Bank Policy on Access to Information (July 2010),
- IFC's Good Practice Note on Addressing Grievances from Project-Affected Communities (2009),
- IFC's Handbook for Addressing Project-Induced In-Migration (2009),
- IFC's Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007),

- WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works.

Equator Principles (EP) / (EP4 revision July 2020)

The Equator Principles adopt a number of policies that play a vital role for financial institutions (EPFI) and revised as EP 4 in July 2020. These principles aim to ensure that projects funded by EPFI's are socially and environmentally responsible. To this end, it includes policies developed to identify, assess and manage social and environmental risks in the financing of projects.

The Equator Principles incorporate a set of principles that emphasize the importance of stakeholder participation. These principles highlight some specific points that are important about the project as follows:

- Environmental and Social Management System and Equator Principles Action Plan (Principal No. 4): This principle requires the creation of a management system and action plan to manage the environmental and social impacts of the project. This plan clearly defines environmental and social responsibilities during the project process.
- Stakeholder Engagement (Principal No. 5): In particular, this principle emphasizes the need for a continuous consultation process with local communities and other stakeholders. It is necessary to consider the views of the population affected by the project activities, and cultural sensitivities and manage this process in a structured way.
- Grievance Mechanism (Principal No. 6): This principle mandates the establishment of a mechanism for people affected by the project activities to submit their complaints. In addition, it ensures that these complaints are recorded, and measures are taken within a certain time interval.

All of these principles are part of a comprehensive approach to managing the social and environmental impacts of projects and help financial institutions invest in more sustainable projects by applying these principles.

5 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Given that the Project is within the scope of the EIA, the stakeholder engagement activities within the scope of the Turkish EIA regulation is mandatory for this project. Moreover, considering the categorization of the project as per EP 4, being a “Category A” project, it is requisite for MOI to demonstrate effective Stakeholder Engagement, as an ongoing process, with affected communities, workers and, where relevant, other stakeholders.

The national EIA process for the CKH Project initiated with the submission of the EIA Application File, outlining the specifics of the project and its impact area and potential environmental impacts and mitigation measures through the MoEUCC online EIA system. Upon submission of the EIA Application File, MoEUCC and the relevant Governorates announced to the public that the Project application was made, the EIA process was started and the opinions and suggestions about the Project should be forwarded to the Governorship or MoEUCC until the EIA process was completed, using appropriate communication tools (for example, announcements, notification platforms, internet, etc.). Then, the Ministry's General Directorate of Environmental Impact Assessment, Permitting and Inspection established a Scope and Review and Evaluation Committee consisting of relevant government agencies and their representatives, as well as relevant universities, representatives of research organizations, experts, professional chambers, unions, associations, and non-governmental organizations that may also participate in the Committee. The project owner and EIA consultant (MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. (MGS)) are also included in this Committee to prepare the EIA report. The Committee formed by the MoEUCC for the CKH Project includes a large number of government agencies and companies that are listed in Table 5-1.

Table 5-1 List of Members of the Committee during the EIA Process

Organization	Directorate/Administration
Ministry of Energy and Natural Resources	General Directorate of Renewable Energy
	General Directorate of Mining Works
	Turkish Electricity Transmission Company (TEIAS)
	General Directorate of Electricity Generation Corporation (EUAS)
Ministry of Culture and Tourism	Adana Regional Board of Directorate for Preservation of Cultural Assets
	Museum Directorate of Mersin Province
Affiliated Governmental Organizations and Companies/Public Economic Enterprises	Petroleum Pipeline Company (BOTAS)
	Çukurova Development Agency
	Turkish Petroleum
	İller Bankası A.Ş.
Ministry of Internal Affairs	Disaster and Emergency Management Presidency (AFAD)
Ministry of Transportation and Infrastructure	General Directorate of State Highways
Ministry of Science, Industry, and Technology	General Directorate of Industrial Regions
Mersin Governorship	Provincial Directorate of Food, Agriculture and Animal Husbandry
Ministry of Environment, Urbanization and Climate Change (MoEUCC)	General Directorate for Protection of Natural Assets

Organization	Directorate/Administration
Ministry of Agriculture and Forestry	General Directorate of Agriculture and Forestry (Mersin Provincial Regional Directorate of Agriculture and Forestry)
	General Directorate of Nature Protection and National Parks
	General Directorate for State Hydraulic Works (DSİ) 6 th Regional Directorate
	Directorate of Forestry
Ministry of National Defence	Department of Construction, Real Estate and North Atlantic Treaty Organization (NATO) Security Investments
Mersin Metropolitan Municipality	Department of Zoning and Urbanization
	Department of Transportation
	Department of Survey and Projects
	Department of Technical Works
Erdemli Municipality	Directorate of Zoning and Urbanization
Silifke Municipality	Directorate of Plan and Project

5.1 Public Information and Participation Meeting

According to national EIA regulations, the public participation meeting (PPM) is held in a central location that is easily accessible by the people most affected by the Project. The date and place of the meeting shall be determined by the relevant Provincial Directorate of the Ministry of Environment and Urbanization ("Ministry"). The date, time, place and scope of the meeting shall be announced on the website of the Ministry, on the notification platforms of the relevant governorates and municipalities, and in one national and one local newspaper (at least ten calendar days before the meeting).

CKH Project public participation meetings were held on 20.10.2016 in Mersin province on the Motorway route. In order to announce the meeting to the public, the date, time and place of the meeting were published in one national (Hürses) and two local newspapers (Silifke Yeni Göksu Newspaper and Erdemli Yeni Haber).

The Public Participation Meeting was chaired by officials from the Ministry of Environment, Urbanization and Climate Change and officials from the Provincial Directorate of Environment and Urbanization. During the meetings, the environmental impacts of the Project and the proposed mitigation measures were presented and the concerns and questions of the participants about the Project were taken. As the project owner, KGM representatives attended the meetings and responded to questions and concerns raised by the participants.



Figure 2 Photos of Public Participation Meeting (Silifke Public Education Center Directorate Meeting Hall) (20.10.2016)

The date for the public information and participation meeting (PIPM) was determined by the MoEUCC and a copy of the EIA Application File was delivered to the Committee members and also the date of PIPM was notified. The PIPM was conducted on October 20, 2016, at a publicly available meeting location in Silifke District of Mersin Province. Apart being disclosed on the website of MoEUCC, on the notification platforms of the relevant governorates and municipalities, the announcement including the date, time, place, and the scope of the meeting was made by MGS in one national gazette and two local newspapers two weeks prior to the meeting date.

The PIPM was chaired by officials from MoEUCC and the Provincial Directorate of Environment, Urbanization and Climate Change. Appendix-4) During the meeting, project description and its characteristics, project location, construction activities together with the project's scope, potential environmental and social impacts during construction and operation phases and associated mitigation measures were presented. The most important issue raised by the local people is the determination of alternative project route in a manner of not passing through agricultural areas since these areas are the

source of livelihood in the region. In this respect, it was suggested to change the Erdemli east connection road route and shift the Project route to the north. The other foremost issues that came to the agenda at the meeting are the route of connection roads and tunnel and the route expropriation fees. Following the PIPM, revisions were made in the project design, i.e. two additional intersections were added, the main route was shortened, and the route was modified in a north/south direction, within the boundaries of the EIA review corridor.

In addition to the fulfilment of the national requirements for stakeholder engagement, together with the commencement of the ESIA studies for the CKH Project in April 2023, further studies for stakeholder engagement were conducted by ASE.

According to the literature on statistical sampling plans for a population of 10,000, a simple random sampling method is used to determine the sample size needed with a 95% confidence level. Based on this approach, it is determined that 398 household surveys are sufficient for data collection. Each of the settlements in the study area is given a chance of selection based on the weighted household sizes.

The social field study was carried out by a team of social experts from 20th of May to 4th of June 2023 and 32 neighborhoods/ villages in Erdemli and Silifke districts were visited. During this study, a total of 30 mukhtars were interviewed face-to-face as part of the field sampling method and sampling strategy within the affected settlement. A field sample was conducted with 45 women and 353 men from the communities affected by the project. A total of 398 household surveys, 4 focus group studies with expropriated landowners/users and 4 focus group studies with women settlers were conducted (see Figure 5-3). A summary list of the mukhtars and household surveys are provided in Table 5-2.

Table 5-2 List of Mukhtars and Household Surveys

No	Province	District	Settlements	Mukhtar Interviews	Number of Household Surveys
1	Mersin	Erdemli	Merkez	1	25
2	Mersin	Erdemli	Elvanlı	1	8
3	Mersin	Erdemli	Fatih	1	1
4	Mersin	Erdemli	Arpaçbahşiş/Zeytinlik	1	14
5	Mersin	Erdemli	Adnan Menderes	1	4
6	Mersin	Erdemli	Barbaros	1	7
7	Mersin	Erdemli	Türbe	1	10
8	Mersin	Erdemli	Yüksek	1	7
9	Mersin	Erdemli	Koyuncu	1	25
10	Mersin	Erdemli	Kocahasanlı	1	18
11	Mersin	Erdemli	Üçtepe	1	4
12	Mersin	Erdemli	Yarenli	1	3
13	Mersin	Erdemli	Limonlu/Yeni	1	9
14	Mersin	Erdemli	Alata	1	4
15	Mersin	Silifke	Kabasakallı	1	2
16	Mersin	Silifke	Demircili	1	14
17	Mersin	Silifke	Sayağzı	1	14
18	Mersin	Silifke	Tosmurlu	1	5
19	Mersin	Silifke	Bucaklı	1	5
20	Mersin	Silifke	Bahçederesi	1	1

No	Province	District	Settlements	Mukhtar Interviews	Number of Household Surveys
21	Mersin	Silifke	Bolacalıkoyuncu	1	4
22	Mersin	Silifke	Atayurt	1	27
23	Mersin	Silifke	Narlıkuyu	1	21
24	Mersin	Silifke	Merkez	-	4
25	Mersin	Silifke	Atakent	1	24
26	Mersin	Silifke	Ayaş	1	8
27	Mersin	Erdemli	Kargıpınarı	1	42
28	Mersin	Erdemli	Tırtar	1	23
29	Mersin	Erdemli	Karakeşli	1	13
30	Mersin	Erdemli	Çeşmeli	1	9
31	Mersin	Erdemli	Taşucu	-	4
32	Mersin	Erdemli	Tömük	1	39





Figure 5-3 Photos of Social Field Study

During the field studies, Informative Text on the Processing of Personal Data was shared with all the interviewed stakeholders in compliance to Personal Data Protection Law No. 6698. Distinct questionnaires were used for the mukhtar interviews, focus group meetings and household surveys (See Appendix-5).

Apart from providing information on the project and its activities to the stakeholders, the aim of the field study was to gather information on the socio-economic structure of the AoI of the project, to reveal the level of information the stakeholders have on the project, to comprehend their approach to the project, to listen their opinion, suggestion, and concerns about the project.

The following topics were chosen to get an overview of the socio-economic structure:

- Demographics and Population,
- Land Use and Ownership,
- Livelihoods and Employment,
- Industry and Local Business,
- Infrastructure and Services,
- Education,
- Community Health,
- Vulnerable/Disadvantaged Individuals/Groups, and
- Level and Source of Information about the Project.

The information obtained in this context is given in Chapter 14 of the ESIA Report. Among these topics, the vulnerable/disadvantaged individuals/groups, which are the key elements within the framework of the SEP are also presented in this SEP.

As an outcome of the field studies, it is observed that there have been no objections or opposition reported regarding the Project. Furthermore, no existing community tensions or negative social relations have been observed.

6 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder identification is a crucial step in effectively managing the overall stakeholder engagement process. It serves to minimize the risk of any single stakeholder group exerting undue influence over the consultation process.

Stakeholders, in this context, are defined as individuals, organizations or groups, who have the potential to impact, be impacted by, or possess a legitimate interest in the outcomes and performance of the project. While some stakeholders are readily identifiable, such as government authorities responsible for permitting, local communities adjacent to the project, it is essential to broaden the scope of preliminary stakeholder identification. This broader identification aims to encompass additional groups, organizations, and individuals, who may not initially appear to have a direct involvement but can still contribute valuable insights.

Throughout the project's lifecycle, stakeholders will be categorized as follows:

- Governmental authorities at the national, regional, and local levels.
- Multinational and international organizations (e.g., United Nations, World Bank Group).
- Non-commercial, non-governmental, and public organizations, particularly those with an interest in environmental and social issues at various levels (international, national, regional, and local).
- Interest groups, such as universities and their foundations, cooperatives, local businesses, business associations, chambers of commerce, and others (e.g., labor, youth, religious, businesses).
- Project affected people (PAPs), including non-organized groups with specific interests or vulnerabilities (e.g., elderly, people with disabilities, ethnic minorities). PAPs encompass landowners and residents who may use communal land.
- Vulnerable groups.
- Project employees.
- Media.

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

- Affected Parties:
 - Direct Affected Stakeholders are individuals/groups/organizations within the project potential Aol, who are directly affected (actually or potentially by the project, and/or identified as most susceptible to project related change, and who require close communication in determining the impacts and their significance, as well as making decisions regarding mitigation and management measures).
 - Indirect Stakeholders refer to other individuals/groups/organization that may be positively or negatively affected by the scope of the project due to the location of the project.
- Other Interested Parties refer to individuals/groups/organizations, who may not be directly affected by the project, but who think or perceive that their interests are affected by the project and/or may influence the project and its implementation process in some way.
- Disadvantaged/Vulnerable Individuals or Groups refer to persons who, due to their vulnerability, may be disproportionately affected or more disadvantaged in accessing the project compared to

other groups and may require special efforts to ensure their equal representation in the consultation and decision-making processes related to the project.

To maintain transparency and demonstrate ongoing efforts to engage stakeholders, a Stakeholder Consultation and Grievance Database will be maintained. This database will document stakeholders' specific interests in the project, issues, concerns, questions raised during consultations, and any grievances submitted.

The key components of this system include:

Stakeholder Register: This aims to identify project stakeholders and their affiliations to better understand and address their concerns and interests through stakeholder identification, analysis, and stakeholder reports.

Recording of Formal Consultations/Minutes of Meetings: This includes maintaining records of meeting agendas, participants' attendance, questions and answers, decisions, information disclosure, as well as the management of actions and commitments.

Complaints and Grievances Management: This involves the receipt, registration, review, investigation, development of resolution options, response, close-out, and monitoring and evaluation of complaints and grievances.

Commitments Management: This is for registering and consolidating all commitments made by the company to stakeholders during engagement activities, facilitating the allocation of a responsible person to manage issues until project closure.

In addition to this system, a Community Liaison Officer (CLO) will be designated to coordinate stakeholder engagement and grievance management activities across all project phases and oversee the Database.

At this stage of the project, preliminary stakeholder identification has been carried out through a desk review, gathering publicly available information on NGOs, government administrative units and agencies, media organisations and international organisations, as well as field research data. However, the extent to which stakeholders will be involved in stakeholder engagement activities will be determined as the process progresses. This level of participation will be discussed directly with the stakeholders themselves.

Vulnerable/Disadvantaged Individuals/Groups

Another stakeholder category is the vulnerable/disadvantaged individuals/groups within the population affected by the project that have been identified through the field survey study conducted as part of the ESIA studies. The potential vulnerable/disadvantaged individuals/groups are listed as follows:

- Elderly people over 65 years of age who live alone and in need of care,
- Households with low or no income,
- Female-headed households,
- People with chronic diseases,
- Households with physically and / or mentally disabled family members,
- Households where the head of the household is a child,
- Informal users of lands, and

- Refugee households.

7 STAKEHOLDER ENGAGEMENT METHODS AND TOOLS

Developing a stakeholder engagement methodology is a crucial step in ensuring the success and sustainability of any project. It provides a structured approach to identifying, analysing, and actively involving all relevant stakeholders throughout the project lifecycle. By fostering transparent communication and building trust, this methodology helps to align expectations, mitigate risks, and enhance collaborative decision-making. Ultimately, a well-designed engagement strategy strengthens project outcomes and promotes long-term support from key stakeholders.

For CKH Project, the strategy constructed for stakeholder engagement process is given in Figure 7-1 and explained below.

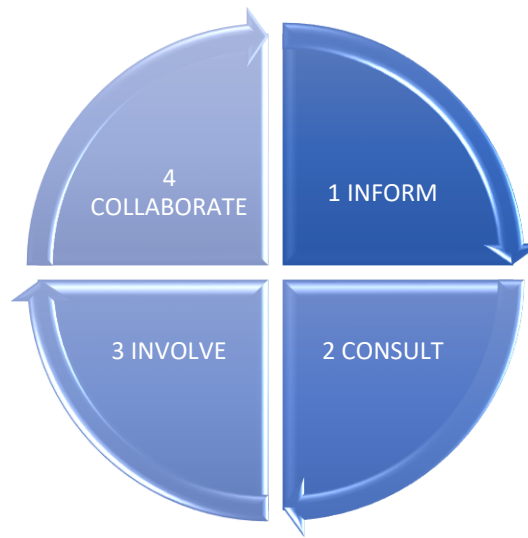


Figure 7-1 Project's Stakeholder Engagement Methodology

1. **Inform:** Stakeholders will be provided with balanced and objective information to assist them in understanding the Project.
2. **Consult:** Stakeholder's feedback will be obtained. They will be informed about the timeline of the assessment, and how they will be acknowledged for their concerns.
3. **Involve:** The project team will engage with the stakeholders during the consultation process and support them to share their concerns and solutions so that the Project can be revised in line with their opinions (if appropriate) at planning stage and also construction, operation and de-commissioning stages (Stakeholder List is given in Table 6-1). MOI will work directly with stakeholders to ensure that stakeholder concerns and aspirations are consistently understood and considered in the assessment process.
4. **Collaborate:** MOI will inform stakeholders on how the issues that were raised during information, consultation and involvement were assessed and involved in project phases. The stakeholders are invested in project outcomes but have limited influence and are unlikely to pose risk to its delivery. The project should provide accurate and timely information, but deeper involvement may not be needed.

The Project Company will use appropriate methods to disclose information about the planned project, consult with stakeholders on the potential benefits and risks of the planned project and measures to mitigate the possible negative impacts. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with proposed projects.

The information will be disclosed at all project implementation stages using methods that will be appropriate for various stakeholder groups. IFC PS1 and EP4 Principle 5 will be followed for all disclosure initiatives and in this way, the project will be kept at international standards. The relevant tools for communication with stakeholders are given in Table 7-1

Table 7-1 Stakeholders Engagement Methods and Tools to be Used

Tool	Description
Non-Technical Summary, ESMP and SEP Document (Including Grievance/ Request Registration Form)	The SEP of the project will be accessible online and offline for all relevant stakeholders in Turkish. In addition to these documents, the “Grievance/Request Registration Form” will also be made available to the public.
Notice Boards	Notice boards will be posted at the site entrance and other agreed locations in the Project affected area, accessible to the communities and updated regularly. Announcements will be made in Turkish. Notice boards will serve as a means of dissemination. For example, the Project team will be able to view contact information and grievance mechanism, construction updates, heavy traffic movement information, and recruitment updates. Wherever possible, maps or visual aids will be used to increase the accessibility of the announcements.
Leaflets	Project information brochures will be created and distributed to provide information on the route of the Project, the expected routes for the transportation of construction equipment, the timetable for construction, details on contractors, and contact information for the contractor and investor, as well as emergency contact information. A similar brochure will be created and distributed locally for the operational phase.
Regular Visits	Regular visits will be conducted to affected settlements to keep track of the community insight and also identify any issue at the beginning stage.
Meetings	Monthly/Quarterly and annually meetings including open-house events will be conducted.
Regular Internal Reporting	The Community Liaison Officer (CLO) will report regularly to the Project team and the Project's Occupational Health and Safety Director. These reports will contain a summary of stakeholder engagement activities, including all grievances received during the reporting period, any significant deviations or non-compliance with the requirements of this SEP, activities planned for the next reporting period, and other issues of potential concern.
Reporting to Stakeholders	The CLO will provide Project updates to different stakeholder groups at specified time intervals. These will include vulnerable groups like women headed households, elderly, disabled and etc.
Reporting for Engagement Activities with Stakeholders	The CLO will maintain a “Stakeholder Contact Log” to plan, record and monitor engagements related to different Project components and activities.

8 STAKEHOLDER ENGAGEMENT PROGRAM

Proposed stakeholder engagement program during project implementation is detailed in Table 8-1.

Table 8-1 Proposed Stakeholder Engagement Program during Project Implementation

Project Stage	Participation Objectives	Participation Activities
Construction	▪ update stakeholders on progress, eg. main construction milestones by regular meetings and visits to affected settlements and households. ▪ maintain social licence and consolidate trust. ▪ manage expectations. ▪ obtain requisite licences and permits. receive, record and address stakeholder grievances;	▪ update SEP for construction phase. ▪ regular announcements of key construction milestones, major equipment delivery schedule, planned interruptions, for example, local traffic. ▪ dissemination of grievance mechanism ▪ information sheet, hardcopies of ▪ grievance forms. meetings / newsletter to report on Project progress and E&S performance;
Operation	▪ update stakeholders on progress and performance. ▪ renew licences and permits; maintain social licence and consolidate trust. ▪ obtain requisite licences and permits. ▪ manage expectations. receive, record and address stakeholder grievances;	▪ update SEP for operation phase. ▪ meetings / newsletter to report on Project progress and E&S performance. ▪ dissemination of grievance mechanism ▪ information sheet, hardcopies of ▪ grievance forms. meetings for the Community Investment Plan preparation and implementation;
Decommissioning	▪ inform stakeholders on ▪ decommissioning works (activities, schedule, staff retrenchment, disposal of materials); ▪ obtain requisite licences and permits. ▪ manage expectations. ▪ receive, record and address stakeholder grievances;	▪ update SEP for decommissioning phase. ▪ dissemination of grievance mechanism ▪ information sheet, hardcopies of ▪ grievance forms. ▪ meetings as part of the local permitting process.

9 ROLES AND RESPONSIBILITIES

The activities outlined in this SEP will be executed during the project implementation by both MOI and KGM. The MOI will bear responsibility for overseeing requests, suggestions, and complaints through mechanisms such as the complaints mechanism, and will adhere to the requirements of the Project Company, IFC PS1, EP4 Principle 5, and Principle 6 within the framework of this mechanism.

The execution and monitoring of this SEP will be overseen by the Environmental and Social Interaction Manager designated by MOI. This manager will appoint a CLO, who will be responsible for stakeholder engagement, SEP implementation, and complaint management for the project.

CLO will undertake the following duties:

- Sharing information and receiving feedback from stakeholders.
- Processing, managing, and monitoring complaints, ensuring timely responses and closure.
- Oversight of corrective or restorative actions to address complaints.
- Periodic review and potential updates to the SEP and stakeholder engagement mechanism to ensure effectiveness and alignment with project conditions.
- Participation in discussions regarding responses and dispute resolution.
- Assisting in the preparation of environmental and social performance reports.

Depending on the complexity of the issues at hand, specialists from the MOI Project Management team and KGM experts may also become involved.

10 GRIEVANCE MECHANISM

The purpose of grievance mechanism is to establish a system for addressing, evaluating and resolving all kinds of internal and external complaints, concerns, questions and suggestions of affected communities and other stakeholders such as construction workers related to project activities. Handling complaints effectively, as well as managing complaints, including avoiding and minimizing complaints, is an integral part of a sound stakeholder engagement strategy. Experience shows that a significant proportion of complaints are caused by misunderstandings and that such complaints can be prevented or reduced in number with a proactive and consistent engagement strategy with communities. Participation also helps anticipate and examine community concerns to prevent them from turning into complaints.

In accordance with IFC PS 2 and EP4 Principle 6, a process is established that persons who feel that they have been adversely affected by the Project during planning, construction or operation can forward their complaints to the Project for evaluation and, if necessary, resolution. A defined/defined Project grievance mechanism is useful in addressing societal and individual concerns and grievances before they get out of control.

10.1 Responsibilities

MOI is responsible for the implementation of the grievance mechanism during the land preparation, construction, and operation phases. The Project Company must ensure that the grievance mechanism is effectively implemented.

The CLO is responsible for taking and managing the complaint process and the measures to be implemented to resolve the incoming complaints, as well as reporting to KGM. The relevant records will be kept and reported to KGM.

10.2 Grievance Mechanism

All complaints related to the project will be evaluated and answered. The grievance mechanism will serve both internal (such as Project Company employees and subcontractors) and external stakeholders. Any person or organization may personally ask questions and/or make complaints about the project.

10.2.1 Methods of Communicating Grievances

The following communication channels may be used to communicate complaints.

- Phone
- Website
- Email address
- Complaint boxes to be placed on construction sites, for working personnel.
- Complaint boxes in different settlements to be placed along the highway route are intended for local residents.
- Direct communication with unit managers and CLOs on construction sites
- Meetings

All complainants may also submit their complaints anonymously.

In addition, MOI is committed to resolving complaints of sensitive nature such as SEA/SH, GBV. The confidentiality of the complainant's credentials and the priority of the complaint will be ensured by MOI.

The sample forms to be used for grievance mechanism are as follows:

- Grievance/Request Registration Form is given Appendix-1,
- Grievance/Request Closure Form is given Appendix-2.

10.2.2 Grievance Mechanism Workflow

The step-by-step complaint resolution process for both internal and external complaints to be accepted is given below:

- Receipt of the grievance through any communication channel.
- Registration into the grievance register (see Appendix-3) and filling out the grievance/request registration form (see Appendix-1).
- The grievance shall be forwarded to the responsible department for handling the grievance within 7 days at the latest from the receipt of the complaint (except for urgent complaints to be dealt with as soon as possible and with priority).
- The grievance is checked/examined for validity by the relevant person (CLO) within 5 days at the latest from the date of receipt.
- If the grievance is not valid, the necessary explanation is given to the complainant. If the grievance is valid, corrective measures are determined to resolve the grievance within 30 days at the latest from receipt. If the grievance takes longer to be resolved, a partial response may be given to the complainant.
- The necessary measures are taken, and a response is given to the complainant. The Grievance/Request Closure Form will be filled out. All comments and grievance will be responded orally or in writing to the complainant according to the method of communication preferred by the complainant, provided that the complainant's contact information is provided.
- The result is registered into the grievance register.

The Grievance Mechanism Workflow is provided in Figure 10-1.

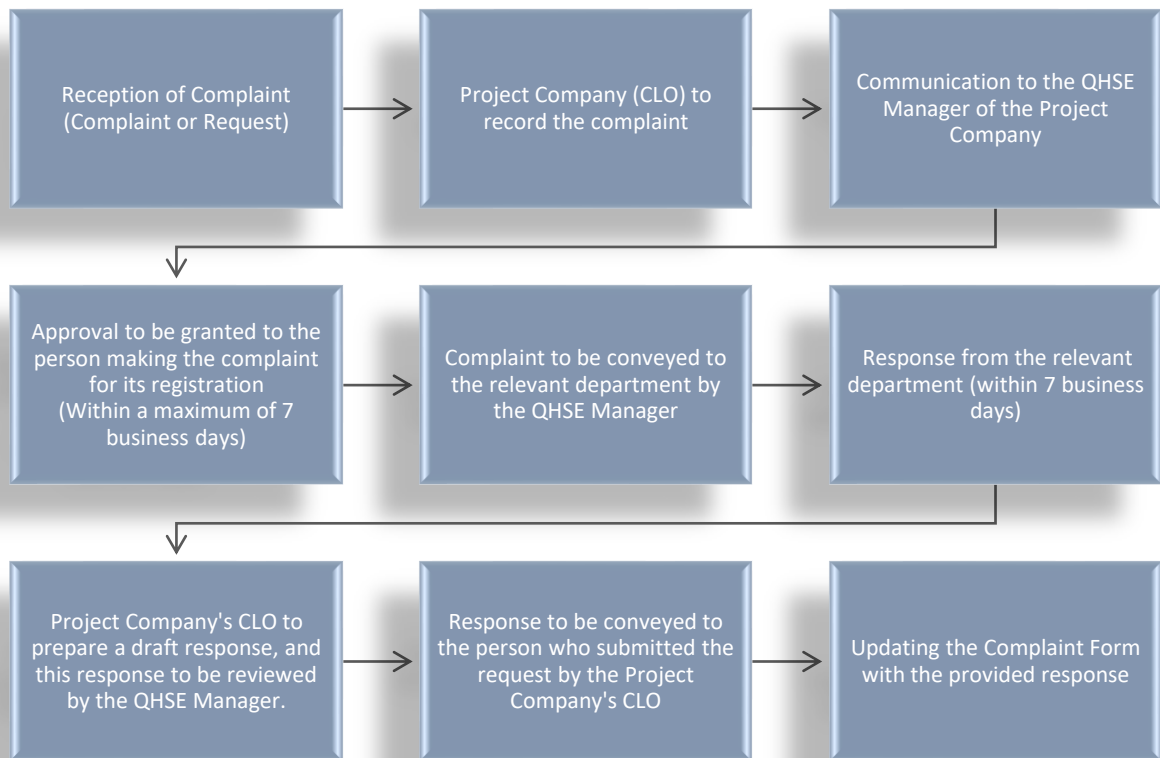


Figure 10-1 Grievance Mechanism Workflow

11 MONITORING AND REPORTING

For effective consultation with the affected communities, information on Project schedule, Project' E&S related documentation (i.e. national EIA, ESIA Study, SEP, etc.) will be disclosed on the website of EPC Contractor (<https://www.KOLIN.com.tr/en#>) or MOI. Besides, hardcopies of relevant documentation in Turkish will be accessible at the Project site as well as other suitable locations (i.e. neighbourhood Mukhtars, teahouses, related municipalities, etc.) for stakeholder review. Information disclosure will also be made through alternative methods such as communication with CLO, face-to-face meetings, media, leaflets/brochures, notifications at above-mentioned suitable locations during the Project's life cycle.

Monitoring activities will encompass the land preparation, construction, and operation phases of the project. This section offers a comprehensive overview of both internal and external monitoring processes, including data collection methods and reporting frequency. Throughout the project's lifecycle, MOI will maintain open lines of communication with the relevant stakeholders as previously identified. Additionally, any new stakeholders identified during the project's progression will be added to the stakeholder database, and communication with them will be initiated. In cases of significant changes or updates regarding the project, we remain committed to addressing and reporting on environmental and social issues to all stakeholders.

Periodic updates to the SEP will occur, especially in response to major project changes. These updates will include concise summaries of issues, concerns, and questions raised during the previous year. Furthermore, they will provide information on any deviations between planned activities and the activities and events that have been carried out.

Annual summaries of grievances will be provided to illustrate the types of issues managed within the process. These summaries will include the number of grievances received, closed, and remaining open. Additionally, the number of grievances will reported that were not resolved through internal procedures and may have required third-party or legal resolutions. Confidentiality will be upheld to ensure that all stakeholders are confident in the reporting of grievances.

As emphasized throughout the SEP, stakeholder engagement is a fundamental process that continually informs ongoing environmental and social management efforts. The SEP will regularly list environmental and social reports that have been prepared and shared with the public. Oversight of this process will be conducted by the Project Company Social Team and CLO, who will be appointed before the construction phase commences.

The reporting commitments pertaining to stakeholder engagement will be fulfilled through periodic disclosures of environmental and social performance information, occurring at least once a year. The exact reporting schedule will be determined upon the completion of the ESIA and the commencement of the construction phase.

11.1 Internal Monitoring

11.1.1 Purpose

KGM will oversee the expropriation process and compensation payments, while MOI will be responsible for ensuring effective stakeholder engagement and the sustainability of development efforts in affected communities. To fulfil these responsibilities, MOI will assess the effectiveness of internal monitoring and employ appropriate methods to address potential impacts. These monitoring and evaluation efforts are vital for effective project management.

Internal monitoring will be conducted by qualified in-house specialists. Audit results will be documented, and corrective actions will be implemented as needed. MOI will also hold monthly meetings with monitoring experts and representatives of relevant stakeholders to review ongoing monitoring activities and make necessary adjustments to indicators, tools, and methods when required. Adequate budget allocations should be made for internal monitoring activities.

11.1.2 Internal Monitoring

The primary goal of internal evaluation is to ensure that activities mentioned in the SEP are executed on time and to the required standards. It will identify any deviations and allow for the implementation of preventive/corrective actions. Therefore, internal monitoring will assess whether SEP activities align with project implementation activities. Performance monitoring, including monitoring of landowners subject to expropriation, individuals requesting state-assisted resettlement (if applicable), and personnel involved in resettlement activities, will occur every six months (or once a year if there are no compliance issues). The data collection methods during performance monitoring include:

- **Stakeholder Consultation Meetings:** Gathering data for monitoring and consultancy activities through meetings held in affected communities to assess the satisfaction levels of affected individuals and the impact of SEP activities on them.
- **Neighbourhood Level Surveys:** Conducting surveys in collaboration with relevant community leaders and authorities.
- **Comprehensive Interviews:** Conducting extensive interviews with affected individuals and local stakeholders who can provide valuable insights.
- **Focus Group Meetings with Vulnerable/Disadvantaged Individuals/Groups:** Holding meetings with vulnerable groups such as the elderly, women, youth, and people with disabilities.
- **Field Observations within the Scope of Monitoring Activities:** Monitoring environmental impacts, the expropriation process, and construction activities through field observations.
- **Expropriation Program and Distributions:** Tracking the timing of phases and land acquisition processes to ensure timely expropriation payments.
- **Discussions or Meetings with Relevant Stakeholders:** Engaging in discussions with authorized organizations responsible for the resettlement of historical and archaeological assets.
- **Grievance/Request Closure Forms:** Recording all project-related complaints and grievances to assess the suitability of SEP practices for construction and land acquisition processes.
- **Project Progress Reports:** Utilizing project progress reports prepared by the Company to monitor the effectiveness and timeliness of SEP activities.

In cases of non-compliance identified through internal monitoring, relevant parties will be promptly informed. Within 15 days of notification, a meeting will be convened to determine corrective/preventive actions and their timelines. The implementation of corrective/preventive actions will be closely monitored during the next monitoring period to ensure effectiveness. If necessary, MOI will adjust or update to the SEP to maintain proper implementation.

11.2 External Monitoring

External monitoring assesses the effectiveness of the SEP and its alignment with the needs of the affected community. This monitoring will be conducted by an external monitoring agency contracted by MOI. The objectives of external monitoring include assessing the impact of accession activities on MOI responsible for SEP implementation, validating internal performance monitoring, and identifying any necessary adjustments to SEP implementation. Stakeholders will be involved in monitoring activities when appropriate. Qualitative and quantitative techniques will be employed in external monitoring to measure target SEP concepts, and the monitoring tools include:

- Key Information Interviews: Conducted with elected local leaders or individuals with specific knowledge/experience of ongoing stakeholder engagement activities and implementation.
- Open Public Meetings: Held to disseminate information about the performance of various stakeholder engagement activities.
- Structured Direct Observations: Including field observations of stakeholder engagement status.
- Structured Interviews: For cross-confirmation of objectives, involving individual and group interviews.
- Informal Interviews: Including unsampled informal surveys with affected individuals, local communities, and Company staff.

The independent monitoring agency will produce a report every six months, consisting of compiled individual reports. These reports will address monitoring questions related to qualitative and quantitative indicators measured through appropriate methodological techniques.

By utilizing the tools and methods outlined above, external monitoring will provide valuable insights into the project's impact and effectiveness.

11.2.1 Monitoring Indicators and Frequency

The proposed SEP monitoring framework and frequency of reporting schedule for CKH Project is defined in Table 11-1.

Table 11-1 Key Monitoring Indicators and Monitoring / Reporting Frequencies

Activity	Obtained Information / Data Type Monitoring Indicators	Information Source / Data Collection Methods	Responsibility for Data Collection, Analysis and Reporting	Monitoring / Reporting Frequency
Internal Monitoring	- Total amount of payment of expropriation fee in accordance with the established timetable - Number of interviews conducted - Number of meetings conducted - Number of grievances received - Number of feedback received - Percent of grievances resolved - No of vulnerable benefitted from "Vulnerability Assistance" program - No of workers employed - No of local workers employed - No of Rehabilitation activity of vulnerable/disadvantaged individuals/groups - No of repaired damages given to infrastructure - Total amount of payments for complaints	- Records of the expropriation process - Socio-economic studies and important information meetings - Records of the implementation of grievance mechanism procedures - Records of the resettlement process for households requesting resettlement (if requested) - Records of initiated income recovery activities - Monitoring and evaluation reports - Stakeholder consultation meetings - Project progress reports	Project Owner	Six (6) weeks (for land preparation and construction phase)
External Monitoring	- Total amount of payment of expropriation fee in accordance with the established timetable - Number of interviews conducted - Number of meetings conducted - Number of grievances received - Number of feedback received - Percent of grievances resolved - No of vulnerable benefitted from "Vulnerability Assistance" program - No of workers employed - No of local workers employed - No of Rehabilitation activity of vulnerable/disadvantaged individuals/groups - No of repaired damages given to infrastructure - Total amount of payments for complaints	- Key briefings with local elected leaders - Open public meetings - Informal talks - Records of the implementation of grievance mechanism procedures - Project progress reports	3 rd party	2 times per year

APPENDICES

Appendix-1: Grievance/Request Registration Form

Grievance/Request Registration Form		
Form Filled By:		Grievance Registration No.:
Type:	Grievance:	Demand:
Date of registration: Grievance Filing Date:		Date of Notification to the Applicant:
Contact Information of the Complainant 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		
Grievance Type:		Environmental Social
Relevant location:		
Subject of the Grievance: 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 grievance/request:		Response Date of the relevant unit:

Appendix-2: Grievance/Request Closure Form

Grievance/Request Closure Form		
Form Filled By:		Grievance/Request Registration No:
EVALUATION OF THE GRIEVANCE		
PRESCRIBED ACTION		
(Make use of documents such as RAP, SEP)		
Who will carry out the action		
Do I need compensation?	☐ YES	☐ NO
CLOSING		
<i>This section shall be completed and signed by the complainant and the complaint resolution committee when the compensation is received, or the file is closed. (Instead of getting the complainant's signature, the bank statement can be added to the form)</i>		
Responsible		Complainant
Name-Surname		Name-Surname
Date and Signature		Date and Signature
		(If possible, explain why it could not be signed)