REPORT

Hatay Dörtyol-Hassa Highway and Railway Tunnel Construction Works Project (25 km)

Livelihood Restoration Plan (LRP)

Submitted to:

DOĞUŞ - EZE Joint Venture

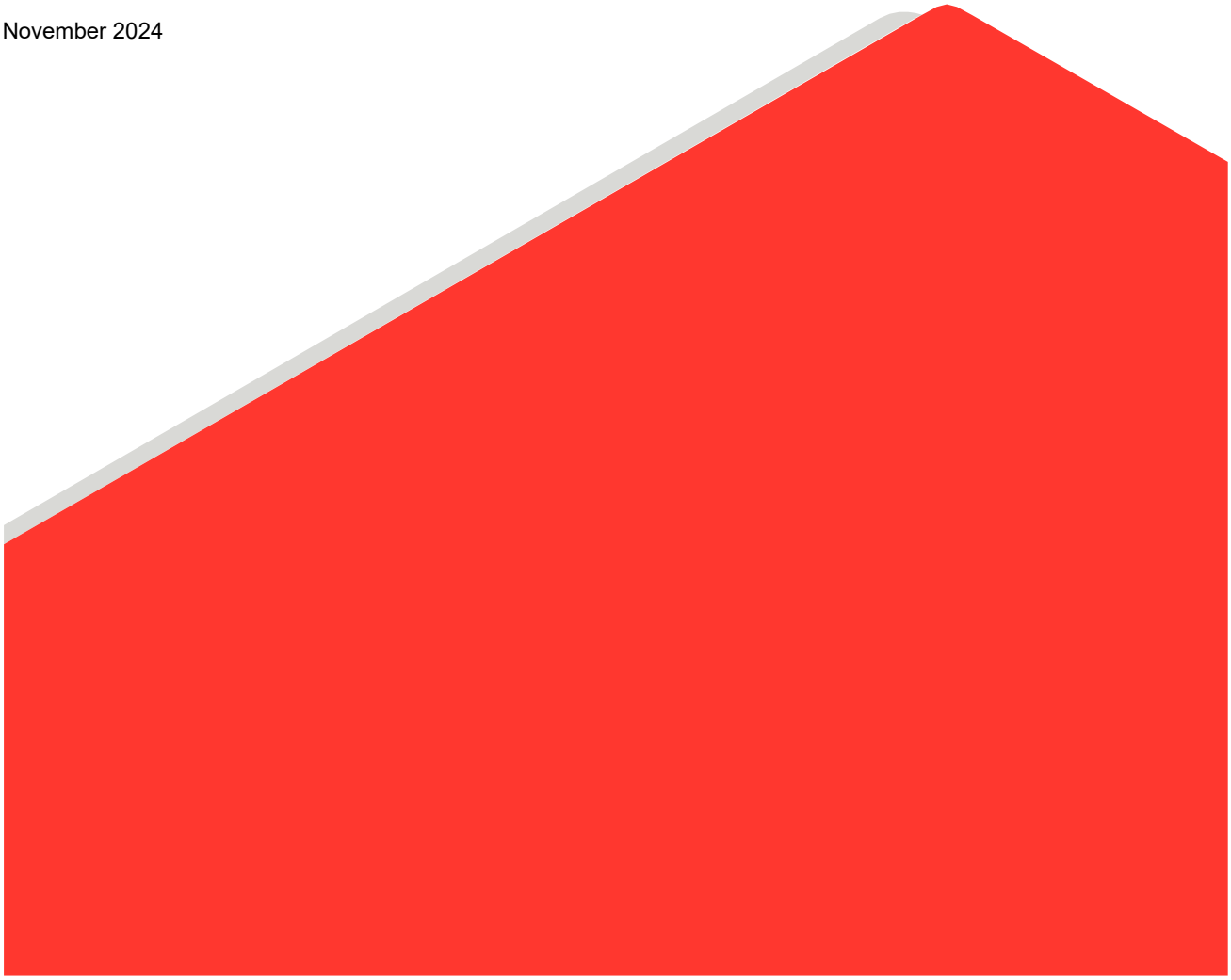
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DEFINITIONS

Associated facility: Facilities that are essential to the construction or operation of an IFI-financed project but are not themselves financed by International Financial Institutions (IFIs). The IFC policy on involuntary resettlement may apply to resettlement induced by such facilities.

Compensation: Payment in cash or in kind for an asset or a resource that is acquired or temporarily affected by a project at the time the asset needs to be replaced.

Cut-off date: Date of completion of the census and assets inventory of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, assets (such as built structures, crops, fruit trees, and woodlots) established after the date of completion of the assets inventory, or an alternative mutually agreed upon on the date (conditional), will not be compensated.

Economic displacement: Loss of income streams or means of livelihood resulting from the land acquisition or obstructed access to resources (land, water, forest, or other resources) resulting from the construction and/or operation of a project or its associated facilities.

Eligibility: Refers to criteria identifying which affected persons are entitled to receive compensation, resettlement assistance and/or other benefits because of resettlement. Usually established either by law or via policies of International Financial Institutions (IFIs).

Entitlements: The compensation offered to persons, households, groups and/or communities affected by the Project. This includes financial compensation, preferential right to certain employment, the right to participate in livelihood restoration programmes, housing, service provision, transport assistance, and other short-term assistance required to move from one site to another.

Entitled PAP: The Persons with the rights provided under the LRP.

Land expropriation: Process whereby a public authority, usually in return for compensation, requires a person, household, or community to relinquish rights to land that it occupies or otherwise uses.

Project-affected household: Any household which, because of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Project-affected person: Any person who, because of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Within the scope of this report, PAPs are considered in two groups according to their impact on the land acquisition:

- Direct-PAPs: Owners, users, or beneficiaries of the affected private and/or public lands.
- Indirect-PAPs: People who live in project affected settlements (PASs) or people who are indirectly affected due to Project activities (accessibility, irrigation and such) but are not addressed directly.

Project-affected settlements: The villages or neighbourhoods where the lands that are the subject of the project's land use are located.

Physical displacement: Loss of shelter and/or assets resulting from the acquisition of land associated with a project that requires the affected person(s) to move to another location permanently.

Replacement cost: The rate of compensation for lost assets must be calculated at full replacement cost, that is, the market value of the assets plus transaction costs. About land and structures, IFC defines “replacement costs” as follows:

- agricultural land: the market value of the land of equal productive use or potential located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected land, plus the cost of any registration and transfer taxes;
- land in urban areas: the market value of the land of equal size and use, with similar or improved public infrastructure facilities and services preferably located in the vicinity of the affected land, plus the cost of any registration and transfer taxes;
- household and public structures: the cost of purchasing or building a new structure, with an area and quality like or better than those of the affected structure, or of repairing a partially affected structure, including labor and contractors’ fees and any registration and transfer taxes.

In determining the replacement cost, depreciation of the asset and the value of salvage materials are not considered, nor is the value of benefits to be derived from the project deducted from the valuation of an affected asset.

Resettlement Action Plan (RAP): The document in which a project sponsor or other responsible entity specifies the procedures that it will follow on how to identify and mitigate potential adverse impacts, compensate for losses, and provide development benefits (to ensure that their current living standards are kept the same or improved) to persons and communities affected by an investment project.

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

Unviable land: The name of the remaining part of the expropriated property which is not suitable for cultivation/benefit under certain conditions.

Vulnerable groups: People who by virtue of gender, ethnicity, age, physical or mental disability, economically disadvantaged, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Acronyms and Abbreviations

The Project	Hatay Dörtyol-Hassa Highway and Railway Tunnel Construction Works Project
Client	DOĞUŞ-EZE Joint Venture
DOĞUŞ- EZE JV	DOĞUŞ-EZE Joint Venture
WSP Türkiye	WSP Danışmanlık ve Mühendislik Ltd. Şti.
Isdemir	Iskenderun Iron and Steel Joint Stock Company (Public)
AoI	Area of Influence
AYGM	General Directorate of Infrastructure Investments
CHS	Community Health and Safety
CIMER	Presidential Communication Centre
CLO	Community Liaison Officer
CLS	Community Level Survey
DSI	State Hydraulic Works
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
EM	Entitlement Matrix
EP	Equator Principles
EPFI	Equator Principles Financial Institutions
E&S	Environmental and Social
ETL	Energy Transmission Line
E&S	Environmental and Social
ESS	Environmental and Social Standards
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ETL	Energy Transmission Line
FGD	Focus Group Discussions
FI	Financial Intermediaries
GLAC	Guide to Land Acquisition
GM	Grievance Mechanism
HLS	Household Level Survey

HSE	Health and Safety and Environment
HSR	High-Speed Railway
H&S	Health and Safety
IFC	International Finance Corporation
IFI	International Financing Institutions
ILO	International Labour Organisation
JV	Joint Venture
KGM	General Directorate of Highways
LRP	Livelihood Restoration Plan
M^2	Meter square
MoAF	Ministry of Agriculture and Forestry
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTI	Republic of Turkiye Ministry of Transport and Infrastructure
N/A	Not Applicable
NGO	Non-governmental Organization
OHS	Occupational Health and Safety
PAP	Project Affected Person
PAH	Project Affected Household
PAS	Project Affected Settlement
PIF	Project Information File
PS	Performance Standard
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SSI	Social Security Institution
TCDD	Republic of Turkiye State Railways
TURKSTAT	Turkish Statistical Institute

1.0 INTRODUCTION

This Livelihood Restoration Plan (LRP) prepared for Hatay Dörtyol-Hassa Highway and Railway Tunnel Construction Works Project (the Project) by WSP Türkiye (hereinafter "WSP") on behalf of DOĞUŞ-EZE Joint Venture (hereinafter "DOĞUŞ-EZE JV" or "the Client") to minimize the livelihood impacts of the Project and to provide the principles and procedures for the restoration of the livelihood that will be impacted by the Project. The scope of the LRP covers highway, single line railway connection, tunnels with three tubes will be used temporarily and permanently by the Project during construction and operation phases of the Project including the construction and operation of available Energy Transmission Line (ETL) and in construction phase temporary Project facilities such as dump sites, camp sites etc. to be used.

Data for the analysis of impacts on the PAPs, were obtained during the baseline studies conducted during the Environmental and Social Impact Assessment (ESIA) and LRP field studies for the Project in August 2024 to analyse impacts of the main components and temporary Project facilities of the Project.

1.1 Project Description

The Project is the construction of a highway and railway that will connect the Gulf of Iskenderun to the Southeast Anatolia region in a more linear manner.

The Project comprises of a 2x2 highway and 1x1 (single line) railway connecting the Gulf of Iskenderun to the Southeastern Anatolia Region in a more linear manner. The tunnel to be built within the scope of the Project is planned to consist of 3 different tubes and the tunnel length will be 18,780 m. The Project covers the construction works between KM: 0-26 and will end at the Hassa junction with D825 State Road.

With this highway and railway project connection, not only the hinterland of the port of Iskenderun will be developed, but also the distance to the port itself will be shorten.

The Project owner is Republic of Türkiye Ministry of Transport and Infrastructure (“MoTI”). The EPC (Engineering, Procurement, Construction) contract for the Project was signed between MoTI, General Directorate for Infrastructure Investments (AYGM) and DOĞUŞ-EZE JV on 23/02/2024. Upon completion of the construction works of the Project, the Project will be commissioned with its transfer from AYGM including all structures and other elements included in the EPC Contract. The operation of the Project will be carried out by Turkish Republic State Railways (“TCDD”) and General Directorate of Highways (“KGM”). DOĞUŞ-EZE JV will not be involved in the operation phase of the Project.

Equity and external financing will cover the investment costs provided by AYGM.

The Project includes construction of infrastructure, construction of above-ground facilities, electrification, signalling and telecommunication facilities. The construction phase of the Project is expected to be completed by the end of 2030, while the operation phase is expected to last for 25 years.

1.2 Project Location

The Project is in the Hatay Province of Türkiye and connects the Gulf of Iskenderun to the Southeastern Anatolia Region. It starts from the Dörtyol District and ends at the Hassa District with a total tunnel length of 18,780 m (see Figure 1). Project layout together with the Project facilities and suppliers is presented in Figure 2 .

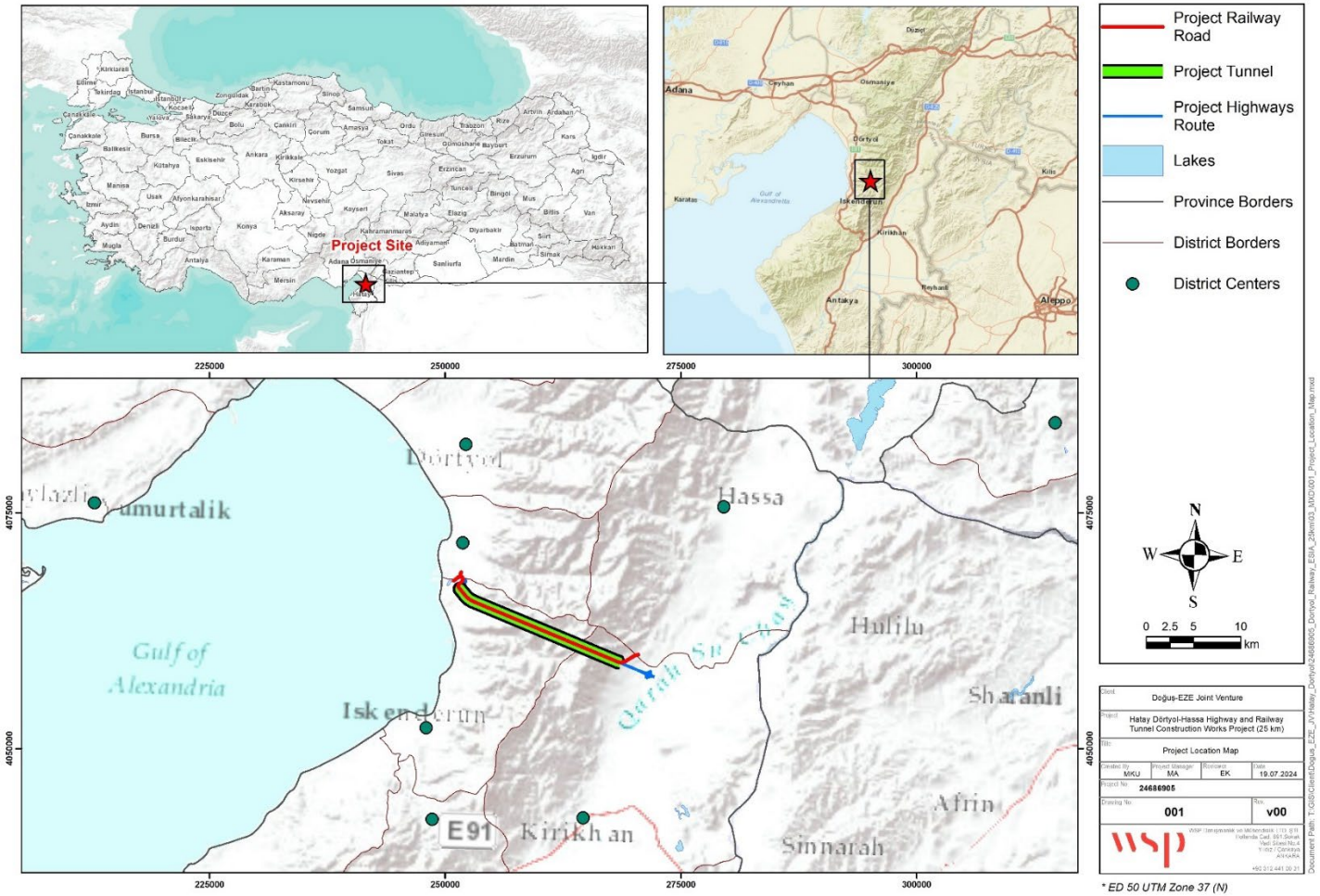


Figure 1: Project Location

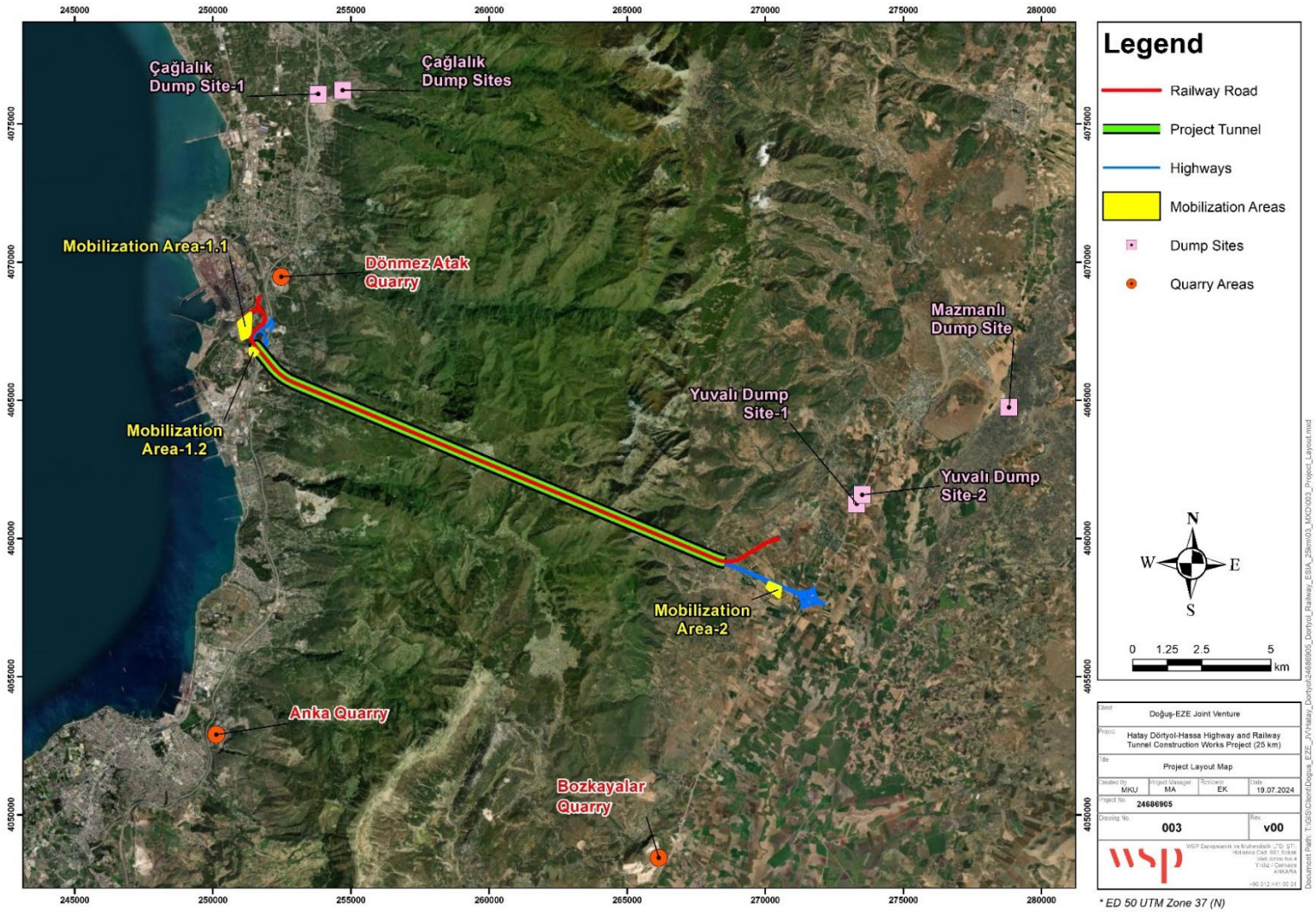


Figure 2: Project Layout with temporary Project Facilities and Supplier Facilities

1.3 Purpose and Scope of the LRP

The impacts of the Project land acquisition are set out in the ESIA and the basic principles of reducing these impacts are specified. This LRP provides detailed information about the impacts of the Project's land requirement on the affected people/assets and further describes the approaches and measures to be adopted to prevent or minimize these impacts.

The Project acts in accordance with all IFC E&S Performance Standards, mainly in Performance Standard 5 and Equator Principles within this report, to minimize the impacts on the affected people and explains how to implement measures to minimize the impacts of the Project on the livelihood sources of local people because of the land acquisition/use/requirement of the Project. The main objectives of IFC E&S performance standards are:

- To avoid, and when avoidance is not possible, minimize economic displacement by exploring alternative project designs,
- To avoid forced eviction,
- To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from the land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected,
- To store or improve, the livelihoods and standards of living of displaced persons.

Within the scope of the Project, physical resettlement has already been avoided during the route selection phase. However, the project still has economic displacement impacts. This LRP has been prepared to manage and minimize the economic displacement problems arising from the land requirement of the Project. Under this main purpose, this document provides:

- A preliminary analysis of the potential land acquisition-based impacts,
- Description of the approach that will be adopted in the LRP,
- When avoidance is not possible, minimizing economic displacement by a compensation strategy,
- Measures to improve living conditions for potentially economically displaced persons,
- Identifying the PAP groups/types that have been and will be economically displaced.

AYGM and DOĞUŞ-EZE JV have experience in managing projects at international standards. Therefore, this LRP has been prepared to be compatible with AYGM and DOĞUŞ-EZE JV's current PS5 applications.

2.0 REGULATORY FRAMEWORK

2.1 National Legal and Regulatory Framework

2.1.1 The Constitution of The Republic of Türkiye

The Turkish Constitution, Article 46, under Subsection 3 of the Section 3 with the heading of “Social and Economic Rights and Responsibilities”., addresses expropriation issues. The article states that whenever a development project serves the public interest, the government is authorized to initiate and execute an expropriation process. All hydropower, airport, highway and other roads, and similar large-scale infrastructure projects are considered to be in the public interest and provide the basis for Article 46. Article 46 is dedicated to the Expropriation Law.

The specific article of the Constitution states that, except in special cases, the compensation value and the decreed increased value will be paid in full and cash to the users. The compensation of the farmers farming the acquired land is paid in full and cash, in any case. Private users on public lands are not addressed by local laws or regulations unless they have an official rental agreement with the government.

Even when land is acquired for a public interest, expropriation agencies cannot benefit from the expropriation of private lands and assets without paying into a bank account the value of the expropriated assets in advance of land entry.

Articles 44 and 45 of the Constitution indirectly relate to resettlement activities. Article 44 addresses land ownership and stipulates the responsibility of the government to protect the landless and those with inadequate land. Article 45 describes the responsibility of the government to support those working on agricultural and stockbreeding activities. Article 56 reaffirms the right of all to live in a healthy environment

Article 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

2.1.2 Expropriation Law (No. 2942)

If and when it is required for the public interest, Expropriation Law sets the procedures of the expropriation of immovable owned by real persons or legal identities subject to private law, the calculation of the expropriation fee and the registration of the immovable asset and its appurtenances in the name of the expropriation administration.

The relevant articles of the Law that will be referred to during the Project’s land acquisition activities are explained briefly in the following sections.

Article 3 - Basis for Expropriation

For the implementation of large projects that concern issues such as energy, irrigation, afforestation etc., administrations may expropriate by paying the expropriation fee for the immovables, resources and their easement rights in cash or as a down payment in equal instalments, as required for the conduct of public services or interventions they are obliged to provide according to laws.

Article 4 – Establishment of Easement Right

An easement is a legal right to use of land of another, without the right to possession of that land, or to take any part of the soil or produce of such land. By Article 4 of the Law No: 2942, instead of expropriating an immovable property, an easement can be granted for a certain portion, elevation and depth of the immovable property or for the resource in Turkiye, if adequate for the purpose. Therefore, easement rights can be established for the

immovable property in favour of the administration without the need for changing its owner in the title deed office to keep the integrity of the land.

However, if the use of the property right of the lands is not violated, the provision of no expropriation regarding the lands is also clearly stated in the same article. Article 4 of the Expropriation Law suggests "Provided that the use of the property rights of the owners are not prevented and the necessary measures are taken in terms of life and property safety, all kinds of bridges, viaducts and similar transportation lines and subways, tunnels and similar rail transport systems can be built under or above the lands, based on the public interest. If the use of the property right of the land is not prevented, no expropriation is made regarding the land." For that particular Project, easement right will be established in the tunnels of the project.

Article 5 – Authorities that Decide on Public Interest

Article 5 of the Law specifies the authorized entities that can take the public interest decision. In the case of the Project, this decision will be acquired by AYGM.

Article 7 – Initial Procedures to be Performed for Expropriation and Administrative Annotation

The administration that is to perform the expropriation prepares or commissions a scaled plan indicating the borders, surface area and type of the immovable assets of resources on which expropriation is to be constituted or appurtenances are to be constituted by way of expropriation, enables that the owners of the expropriated immovable asset, the ownerships if no title deed registrations are present and their addresses by binding them to documents through an inquiry it would conduct on the land registry, tax and population registry records as well as additional inquiries.

After the administration decides on expropriation, the related annotation is dropped into the title deed offices where the mentioned immovable asset is registered. If the owner changes after the annotation notification date, the title deed administration is obliged to notify the administration of any changes to occur in the ownership or the rights in kind that are separate from the ownership.

If the document to be obtained from the court indicating that a request for the identification of the expropriation fee and the registration in the name of the administration as per Article 10 is not submitted to the title deed offices within six months starting on the annotation date, this annotation is automatically dropped from title deed records by the title deed offices.

Article 8 – Procurement Procedure

According to Article 8, after the expropriation decision is taken, the administration will appoint one or more valuation commissions (consisting of at least 3 people) to valuate immovables. Additionally, one or more negotiation commissions (again consisting of at least 3 people) will be assigned for negotiations.

After the administration has notified the owner of its intent to take over the immovable, shall the owner or its representative apply to the administration (within 15 days after notification) with the intent of selling the immovable, negotiation meetings are held on the date identified by the commission and if an agreement is reached on an amount that is not more than the estimated value, an official agreement protocol is signed. With this sign-off, all rights are agreed to be transferred to the administration and any further legal attempt at any objection will not be considered.

The administration prepares the amount agreed in the protocol within forty-five (45) days and asks the owner to transfer the ownership rights in the name of the administration on the date specified in the title deed. The expropriation fee is paid as soon as the transfer of rights is realized.

In cases where an agreement is not reached or transfer is not realized, action is taken in court either for Article 27 (Urgent Expropriation) or Article 10 (Determination of Land Value and Registration Case) of this Law.

Article 10 – Identification of the Expropriation Compensation by Court and Registration of Immovable in the Name of the Administration

Article 10 states that, if the expropriation cannot be realized through procurement for any reason, the administration applies to the court of the first instance in the locale of the immovable and requests that the expropriation compensation for the immovable asset be identified and a decision be made for its registration in the name of the administration in return for the payment of this fee.

Within 30 days of the application of the administration, the Court notifies the owner of the immovables through an annotated invitation on the date of hearing. To those whose addresses could not be found after inquiries, an announcement is made according to Notification Law (No. 7201) inviting them to attend the hearing. The Court also publishes information on the expropriation at least once in a local newspaper (if there is any) issued in the location of the immovable and in one of the newspapers circulated across Turkiye.

On the day of the hearing, the judge invites the parties to reach an agreement on the value of the immovable. If an agreement is reached, the judge considers this compensation amount to be the expropriation fee. In cases where an agreement is not reached, the judge schedules a site survey (within ten days) to identify the value of the immovable asset and a date for the second hearing (within thirty days after the expedition).

On the second hearing, if the parties fail to agree on the value once again, the judge will assign a new expert committee for the valuation within fifteen days and then identifies a fair and equitable expropriation fee by referencing both the reports and statements of the parties and experts. The identified fee is the expropriation fee of the immovable, resource or its easement rights. The Court grants fifteen days to the administration for the fee to be deposited in a bank on behalf of the owner. In cases where the right holder could not be identified, the court decides on the registration of the immovable in the name of the administration under the circumstances that the bank receipt indicating the amount was blocked to be given to the right holder to be revealed in the future and that this decision is notified to the title deed department and the bank where the fee was deposited. The provision on registration is definitive and the parties reserve their rights for appeal pertaining to the fee.

Article 11 – Principles for the Identification of the Expropriation Fee

This article states that “The expert committee to be formed as per Article 15 will go to the location of the immovable or resource to be expropriated with the court delegation, hear the statements of related parties present and draft a justified report that identifies the expropriation fee”.

The identification of the value of the immovable does not consider any value increase caused by the public works and services realized through expropriation as well as any profit that would be caused by future uses.

During the establishment of easement rights, shall there be any value decreases in the immovable or the resource due to expropriation will be justified. This decrease in value is the easement expropriation cost. Valuation procedures and principles are presented in detail under the title of Section 3.0..

Article 12 – Partial Expropriation

The value of the partially expropriated immovable is defined in this Article, whereas it also states that if the part of the immovable excluded from expropriation is suitable for utilization under the public works legislation, the expenses and cost required for the restoration of any installations to a usable status will be calculated and added to the expropriation fee.

The value of the immovable property that is partially expropriated shall be estimated as follows:

a) Provided that there does not exist any change in the value of the non-affected part of the immovable property, the value of the partially expropriated immovable property shall be equivalent to the proportion to be expropriated at the amount determined for that immovable property according to the provisions of Article 11.

b) If there is a decrease in the value of the non-affected part, the value of the partially expropriated immovable property will consist of the expropriation fee determined for the affected part of the immovable property in compliance with paragraph (a) plus the amount corresponding to the decrease of the value of the non-affected part.

Shall the remaining part of a partially expropriated immovable is not suitable for utilization, this part also may be expropriated upon the written application made by the legal owner within thirty days of the notification of the expropriation decision in cases where no lawsuits were filed in the administrative court against the expropriation procedure.

Unviable lands:

If the remaining part of the expropriated property is not economically suitable for cultivation/benefit or is not accessible, an application for expropriation of the remaining property must be made within thirty days after the submission of a written notice without the need to file a lawsuit in the administrative court (pr.7). However, AYGM proactively includes unviable lands (small and/or misshaped) in the expropriation amount right from the beginning.

Article 14 – Right to a Lawsuit

A lawsuit for cancellation of land acquisition decision in the administrative court or for correction of the material errors may be filed against the expropriation procedure within thirty days as of the date of notification issued by the court as per Article 10 - the date of notification is replaced by the date of the announcement in the newspaper by the court for those who could not be notified- by the owner of the immovable asset subjected to expropriation.

Article 18 – Dispute on the Ownership

The administration identifies whether there are any disputes on the immovable to be expropriated by performing an inquiry at the title deed offices, cadastral offices and civil courts in the location of the immovable. Shall the inquiries indicate that there is a dispute on its ownership or that it was subject to a lawsuit, the entirety of documents prepared as per Article 10 is submitted to the civil court of first the instance of the location of the immovable and is requested that the expropriation fee of the immovable is determined as well as its registration is made in the name of the administration in return for the payment to be made to the right holder as soon as they have been determined as per the ongoing dispute case.

The initial and consequent instalments of the expropriation fee identified by the court are deposited in the time deposit accounts with quarterly terms each at the bank designated by the court.

The process to be followed to resolve the disputes on ownership will be in line with the procedures defined in the relevant legislation.

Article 19. Registration of immovable properties not registered in the land registry and the rights of the possessor

The administration determines whether the immovable property that is not registered in the land registry and decided to be expropriated is among the public properties listed in Article 16 of the Cadastre Law No. 3402 dated 21/6/1987 by asking the relevant places.

If it is determined as a result of this investigation conducted by the administration that there is a possessor of the immovable property that is not registered in the land registry and that a claim of acquisition is made by possession, an on-site investigation is conducted by experts and evidence is collected and recorded in a report. The area of the immovable property, the identity of the possessor, tax record, the starting date and duration of possession, and whether the conditions for acquiring ownership are met are stated in this report.

All documents prepared and collected by the administration are transferred to the civil court of first instance for the determination of the expropriation price of the immovable property. The court determines the expropriation price of the immovable property in the manner and within the period specified in Article 10. If the court deems the information and documents provided by the administration sufficient to indicate possession, it shall notify the administration of the expert report regarding the determination of the expropriation price, and the other documents provided by the administration together with this report shall be notified to the determined possessor.

In the expropriation of a land registered in the name of another person, ownerless and/or not acquired by the possessor, the minimum maintenance cost of the buildings and the cost of the trees shall be paid to the possessor. The land cost shall not be paid.

In this project, if the de facto owners of olive gardens are not compensated under Article 19, they shall be compensated under Section 6.0.

Article 25 – Limitation of Rights and Transfer of Ownership to the Administration

The expropriation procedure is initiated through the notification conveyed by the Court as per the Article 10, regarding exercising of rights and fulfilment of obligations. The transfer of ownership to the administration is realized based on the decision for registration taken by the Court.

The owner of the immovable loses his/her rights to engage in activities such as construction or cultivation or to make fundamental changes in the current structure of the immovable after the date of the registration decision taken by the Court. The value of activities performed after this date is not considered.

An additional paragraph added in 2013 states that for large projects such as dams, irrigation networks and pipelines, highways, railways, harbours and airports, the decision for the public interest is announced in the mukhtar's office of the neighbourhood and/or village where the immovable to be expropriated is located. After the last day of the announcement (public interest), the cost of the fixed installations on the immovable and the trees planted are not considered in the identification of the expropriation fee. This limitation for the immovable may not be more than five years after the announcement has been made.

Article 27 – Urgent Expropriation

For the expropriation of immovable required in cases of need or urgency for the defence of the country or in extraordinary situations decided by the President or envisaged in special laws as part of the enforcement of the Law on the Obligation for National Defence number 3634, the immovable asset at stake may be confiscated using the administration depositing the amount for the value of the said immovable asset identified by the court as per the principles in Article 10 (Amended statement: 24/04/2001 - 4650/Article 15) and via the experts selected as per Article 15 at the bank stated in the invitation and announcement made according to Article 10 (Amended statement:24/04/2001 - 4650/Article 15) within seven days upon the request by the related administration with the procedures other than the value appreciation to be completed later on.

Urgent Expropriation, Article 27 of the Law

- In cases where a resolution will be issued by President or in extraordinary cases prescribed by special laws,

- as for the expropriation of immovable property, immovable property can be seized by the court by depositing in the name of the owner the value of that immovable property as determined by experts to be selected as per Article 15 within the framework of principles in Article 10 into the bank as specified in the invitation and notice to be made according to Article 10 within seven days upon the request of the relevant administration on the condition that actions other than valuation are completed later on.

In terms of urgent expropriation, land valuation performed by experts appointed by the court is only a determination and is not decisive. After this price is determined and deposited by the Administration into the account number as determined by the court, actions stipulated in Articles 8, 9 and 10 shall apply.

Article 30 – Transfer of an Immovable Owned by an Administration to Another Administration

This article articulates that immovable, resources and easement rights owned by public legal persons and agencies may not be expropriated by another public legal person or agency.

The administration that requires the immovable, resource or easement rights identifies the fee according to Article 8 of Expropriation Law. It lodges a written application at the administration owning the asset by stating the amount it would pay based on this fee. If the owner of the asset fails to abide by the transfer and respond within sixty days, the conflict is settled via an affirmed decision within two months after being inspected by the relevant administrative office of the Council of State upon application by the receiving administration.

If the parties fail to reach an agreement on the price, the receiving administration lodges an application at the court according to the procedure written in Article 10 within thirty days of the notification date of the Council of State decision asking for the expropriation fee to be identified. In the adjuration process to be conducted in this case, the court does not enforce the provisions of the Law dated 9/6/1938 and number 3533.

A period of fifteen days is granted to the receiving administration for the fee identified as the expropriation fee as per the procedure envisaged in Article 10 to be deposited in the bank specified by the administration to be given to the asset-owning administration and the receipt of the fee deposited to be submitted. This period may be extended as necessary only once by the court. The court decides on the registration of the immovable asset in the name of the administration and the expropriation fee to be paid to the asset-owning administration upon the submission of the receipt indicating that the expropriation fee was deposited by the receiving administration in the bank in the name of the asset-owning administration and this decision is notified to the title deed department and the bank where the money was deposited. The provision on registration is definitive and the parties reserve their rights for appeal concerning the fee.

The immovable, resource and the easement rights thus taken over are deemed to have been received via expropriation and they cannot be used for transfer purposes or any public purposes other than those allowed by the transferring administration. Otherwise, the transferring administration may receive the immovable back as per Article 23. This matter is annotated in the field of declarations in the title deed log.

2.1.3 Resettlement Law (No: 5543)

Resettlement activities are regulated by Resettlement Law No. 5543 and Regulation for the Execution of Resettlement Law. Resettlement Law deals with the families applying to related governmental agencies in the Project region and requesting government-assisted resettlement. Resettlement assistance from the government is provided for entitled families while expropriation compensation payments are paid to all individuals possessing immovable properties in the Project area.

The Resettlement Law provides for government-assisted resettlement in rural and urban areas. However, this law can only be used by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) and the institutions authorized by it. AYGM and TCDD are not among the authorized institutions.

2.1.4 Cadastral Law (No. 3402)

The Cadastral Law determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps to register land and to constitute the basis of the spatial information system as the Civil Law (No. 4721) stipulates.

2.1.5 Notification Law (No. 7201)

The Notification Law No. 7201, with its amendments in 2003, 2008 and 2011, provides the basis for a process of notification for property owners. It consists of specific procedures to be followed to reach a range of public and private owners, including those whose addresses are unknown. According to the Law, notification provisions include mail to known addresses; seeking support from local authorities; publication through an advertisement placed in a national newspaper published throughout the country in significant numbers; and electronic communications. The Law guides communicating with different categories of shareholders, including resident owners, absentee owners, owners outside Turkiye, and various public agencies. The specificity and broadness of the Law support international policies' emphasis on communications and consultation.

The Notification Law details the process of notification for landowners and land users whose address is unknown as determined by the Notification Officer. According to the modifications made in the Law in 2011 (Article 10), the notification can be made wherever appropriate for the affected owner and/or to the last address known. If the person cannot be reached, notification is sent to the last known residence and is directed to the village or municipal quarter mukhtars.

2.1.6 Land Registry Code (Official Gazette No. 28738)

This code aims to keep the land registry records in order concerning Civil Law (No. 4721). It comprises of the principles and procedures pertaining to ownership, limited real and individual rights of immovable assets, and their entry, amendment, cancellation and rectification to the land registry.

2.1.7 Forest Law (No: 6831)

By the Forest Law, the Project must obtain permission from the Ministry of Agriculture and Forestry (MoAF) to perform activities in forests or lands classified as forests and is required to indemnify damages to public forests resulting from the construction of the railway.

The use of forestry and pastureland is regulated by Forest Law No.6831 and Pasture Law No. 4342. Registration of the ownership or easement rights will be carried out following Cadastral Law No. 3402, and Land Registry Code (Official Gazette No. 28738).

According to Law (17.06.2004 article 5192/1), the Ministry has the authority to permit the use of forestland. This permission cannot be longer than 49 years.

2.1.8 Pasture Law (No: 4342)

According to this Law based on the views of the Pastureland Commission the Governors in Project affected provinces have the authority to permit altering the classification of pasturelands.

Neither the right of the public nor of the specific users of pastures is recognized under the local legislative framework. Compensation will be paid for pasture lands to the relevant public agencies. However, in institutions subject to the general budget such as AYGM, no payment is made for these parcels.

2.1.9 Agricultural Reform Law (No. 3083)

The Agricultural Reform Law regulates several issues for lands that are irrigated and that have been determined by the President. The Law covers matters regarding land consolidation and allocation of land for other purposes rather than agriculture in case of need. It is stipulated in the Law that in areas where agricultural production has

no longer economic viability due to fragmentation, land consolidation works will be realized to prevent fragmentation that will result in affecting both on the livelihood and the work force of any family.

2.2 International Standards

2.2.1 IFC Performance Standards

IFC's Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of IFC's approach to risk management. The Sustainability Framework comprises IFC's Policy and Performance Standards on Environmental and Social Sustainability, and IFC's Access to Information Policy. The Policy on Environmental and Social Sustainability describes IFC's commitments, roles, and responsibilities related to environmental and social sustainability. IFC's Access to Information Policy reflects IFC's commitment to transparency and good governance in its operations and outlines the Corporation's institutional disclosure obligations regarding its investment and advisory services. The Performance Standards are directed towards clients, guiding how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business sustainably, including stakeholder engagement and disclosure obligations of the client about project-level activities. In the case of its direct investments (including project and corporate finance provided through financial intermediaries), IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced.

According to the Guidance Note 5 of IFC, where land acquisition and resettlement are the responsibility of the government, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this Performance Standard. In addition, where government capacity is limited, the client will play an active role during resettlement planning, implementation, and monitoring[1]. For this reason, this LRP will also reveal the task sharing between AYGM and DOĞUŞ-EZE JV.

IFC uses the Sustainability Framework along with other strategies, policies, and initiatives to direct the business activities of the Corporation to achieve its overall development objectives. The Performance Standards may also be applied by other financial institutions. Together, the eight Performance Standards establish standards that the client is to meet throughout the life of investment by IFC:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labour and Working Conditions
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage

The fifth standard in this list form the basis of this LRP.

[1] IFC Guidance Note 5 (2012) https://www.ifc.org/wps/wcm/connect/61320ff7-0e9a-4908-bef5-5c9671c8ddfd/GN5_English_2012.pdf?MOD=AJPERES&CVID=mRQjWGZ

PS 5: Land Acquisition and Involuntary Resettlement[2]

Performance Standard 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) because of project-related land acquisition and/or restrictions on land use. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement.

This occurs in cases of (i) lawful expropriation or temporary or permanent restrictions on land use and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail. Project Company will collaborate with the AYGM to achieve the objectives of IFC PS 5.

This Performance Standard applies to physical and/or economic displacement resulting from the following types of land-related transactions:

- Land rights or land use rights acquired through expropriation or other compulsory procedures per the legal system of the host country,
- Land rights or land use rights acquired through negotiated settlements with property owners or those with legal rights to the land if failure to reach settlement would have resulted in expropriation or other compulsory procedures,
- Project situations where involuntary restrictions on land use and access to natural resources cause a community or groups within a community to lose access to resource usage where they have traditional or recognizable usage rights,
- Certain project situations requiring evictions of people occupying land without formal, traditional, or recognizable usage rights,
- Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, freshwater, medicinal plants, hunting and gathering grounds and grazing and cropping areas.

According to the standard, in the case of physical displacement, the Client will develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of this Performance Standard regardless of the number of people affected. This will include compensation at full replacement cost for land and other assets lost. The Plan will be designed to mitigate the negative impacts of displacement; identify development opportunities; develop a resettlement budget and schedule and establish the entitlements of all categories of affected persons (including host communities). Particular attention will be paid to the needs of the poor and the vulnerable. The client will document all transactions to acquire land rights, as well as compensation measures and relocation activities.

If people living in the Project area are required to move to another location, the client will (i) offer displaced persons choices among feasible resettlement options, including adequate replacement housing or cash compensation where appropriate; and (ii) provide relocation assistance suited to the needs of each group of

[2] IFC Performance Standard 5 (2012) https://www.ifc.org/wps/wcm/connect/75de96d4-ed36-4bdb-8050-400be02bf2d9/PS5_English_2012.pdf?MOD=AJPERES&CVID=jqex59b

displaced persons. New resettlement sites built for displaced persons must offer improved living conditions. The displaced persons' preferences concerning relocating in pre-existing communities and groups will be taken into consideration. Existing social and cultural institutions of the displaced persons and any host communities will be respected.

In the case of physically displaced persons under paragraph 17 (i) or (ii), the client will offer the choice of replacement property of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets.

However, there is no physical displacement impact of this project.

PS 1: Assessment and Management of Environmental and Social Risks and Impacts[3]

Performance Standard 1 establishes the importance of (i) integrated assessment to identify the environmental and social impacts, risks, and opportunities of projects; (ii) effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and (iii) the client's management of environmental and social performance throughout the life of the Project. Performance Standards 2 through 8 establish objectives and requirements to avoid, minimize, and where residual impacts remain, to compensate/offset for risks and impacts to workers, Affected Communities, and the environment. Where environmental or social risks and impacts are identified, the client is required to manage them through its Environmental and Social Management System (ESMS) consistent with Performance Standard 1. Under this standard, Project Company has been preparing ESIA and ESMP documents per international standards.

Another issue that draws attention within the scope of PS 1 and is important for the Project is the role sharing between the private sector and the government.

2.2.2 Equator Principles

The Equator Principles (EPs) is a voluntary financial industry benchmark for determining, assessing, and managing social and environmental risks in Project financing.

The EPs are considered the financial industry 'gold standard' for sustainable Project finance. The EPs, based on the IFC PSs on social and environmental sustainability, and the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its Project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs. The list of the EPs presented below:

- Principle 1: Review and Categorization.
- Principle 2: Environmental and Social Assessment.
- Principle 3: Applicable Environmental and Social Standards.

[3] IFC Performance Standard 1 (2012) https://www.ifc.org/wps/wcm/connect/8804e6fb-bd51-4822-92cf-3dfd8221be28/PS1_English_2012.pdf?MOD=AJPERES&CVID=jiVQlfe

- Principle 4: Environmental and Social Management System and EP Action Plan.
- Principle 5: Stakeholder Engagement.
- Principle 6: Grievance Mechanism.
- Principle 7: Independent Review.
- Principle 8: Covenants.
- Principle 9: Independent Monitoring and Reporting.
- Principle 10: Reporting and Transparency.

Principle 5 in specific sets out that, “For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with affected communities and, where relevant, other stakeholders. The client will conduct an informed consultation and participation process for projects with potentially significant adverse impacts on affected communities. 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. This process should be free from external manipulation, interference, coercion, and intimidation”.

“To facilitate stakeholder engagement, DOĞUŞ-EZE JV will, commensurate to the Project’s risks and impacts, make the appropriate assessment documentation readily available to the affected communities, and where relevant other stakeholders, in the local language and a culturally appropriate manner”.

“The client will take account of, and document, the results of the stakeholder engagement process, including any actions agreed resulting from such process. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the assessment process, in any event before the Project construction commences, and on an ongoing basis”.

Principle 6 in specific sets out that “For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System (ESMS), to establish a grievance mechanism designed to receive and facilitate the resolution of concerns and grievances about the Project’s environmental and social performance. The grievance mechanism must be scaled to the risks and impacts of the Project and has affected communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism in the course of the stakeholder engagement process”.

According to commitments to fill the gaps between national legislation and EPs related to stakeholder engagement see Stakeholder Engagement Plan (SEP) of the Project.

2.3 Gap Analysis between National Legislation and IFC Performance Standards

There are some gaps between IFC performance standards and national legislation regarding the preparation of LRP. LRP includes additional measures to eliminate gaps such as Census and Baseline information, Cut-Off Dates, Full Replacement Value and Compensation for lands and fixed assets, Requirement to prepare a Resettlement Action Plan, Measures for Vulnerable Persons, Monitoring and Evaluation (M&E), Information Disclosure, Project-level Grievance Mechanisms (GM), etc. The main gaps between Turkish Law and IFC Policies are summarized in the table below. The table also contains the Client's mitigation measures.

Table 1: The Main gaps between Turkish Law and IFC Policies

Gap Subject	IFC Standards	Turkish Legislation	Gaps	Responsibilities for filling the gaps
Avoidance and Minimization	According to IFC PS 5 involuntary resettlement should be avoided where feasible or minimized.	There is no provision regarding avoiding and minimization of resettlement in Turkish Expropriation Law. However, physical displacement of local communities is not preferred by the state because of its high social and economic costs.	There is a legal gap, but there is no gap in practice.	AYGM avoided physical resettlement. No residential or commercial buildings are affected by the land acquisition of the Project. Route selection criteria addressed to avoid potential resettlement. DOĞUŞ-EZE JV has prepared a LRP and defined the entitlements to minimize economic resettlement. DOĞUŞ-EZE JV and AYGM will act together in their implementation.
Census and Baseline information and cut-off-dates	According to PS 5, when land acquisition or restrictions on land use are unavoidable, the Borrower will, as part of the environmental and social assessment, conduct a census to identify the persons who will be affected by the Project, to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	Turkish Law requires preparation of inventory of assets. Land acquisition through expropriation requires the preparation of a census (full count) of affected immovable assets, and a full list of their owners.	National requirement is limited to census of immovable assets and legal titleholders. Census and baseline information on Project affected populations as defined by IFC PS5, including tenants, users of communal land, and land holders/occupants without legal or customary title are not required.	The inventory of assets will be prepared by AYGM. AYGM will identify the users, tenants and informal users of the affected parcels in all settlements and ensure compensations are paid under construction responsibility before starting the construction. In the scope of LRP preparation filed study, owners and users were identified for LRP entitlements (Census) but assets on the lands were not identified yet officially. The cut-off date is the date when the "asset inventory observation" is made and the assets on the land are recorded officially. [NTD: If this study is not done as soon as possible, PAPs may make new improvements on the lands. PAPs have been informed about the expropriation, but official notification is required to prevent new improvements on the lands.]
Requirement to prepare a Resettlement Action Plan	According to IFC PS 5, in the case of economic and / or physical displacement, the Borrower will develop a Resettlement Action Plan.	No legal provisioning forces the Project proponents to prepare resettlement action plan under Turkish Law.	Resettlement planning is a key gap, since resettlement-related documentation only	DOĞUŞ-EZE JV has prepared this LRP to address economic displacement in line with IFC PS5.

Gap Subject	IFC Standards	Turkish Legislation	Gaps	Responsibilities for filling the gaps
			includes cadastral information, asset list and compensations. Livelihood impacts and losses are not addressed.	There is a container area used by earthquake-affected workers on the lands used by Isdemir out of expropriation area of the project. This container area near the lands to be acquired of the project. If the Isdemir lands contain containers are affected The area will be moved by İsdemir.
Full Replacement Value and Compensation	According to PS 5, when land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, the Borrower will offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods. PS 5 states that the Borrower will offer the choice of replacement property of equal or higher value, with security of tenure, equivalent or better characteristics, and advantages of location, or cash compensation at replacement cost. Economically displaced persons who are without legally recognizable claims to land will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost.	Valuation of agricultural land depends on capitalization of annual net income calculated by taking market prices into account. Buildings are compensated by use of their cost of construction given by reference values defined by MoEUCC and market value. However, depreciation and demolition costs are deducted from calculated values. According to Article 3 of the CMB Communiqué on Valuation Standards in the Capital Markets (III-62.1), which came into force by being published in the Official Gazette dated 01.02.2017 and numbered 29966, "In the valuation activities carried out, the Valuation Experts Association of Türkiye and the Capital Markets Association of Türkiye" It is mandatory to comply with the published International Valuation Standards. For this reason, during the expropriation of lands, valuation is carried out in accordance with PS5. However, there are still gaps between national legislation and international standards during the expropriation of structures/buildings.	Lands and trees are compensated at full replacement value when structures are not compensated at full replacement value.	The approaches identify the final value required to provide compensation following national requirements, however, for structures, full replacement value as required by PS5 will be paid from LRP Fund of the project. [NTD: Will the LRP Fund be created by AYGM, DOĞUŞ-EZE JV or from the available budget of both? Please determine through consultation between the parties.]
Loss of Business	In cases where land acquisition or restrictions on land use affect commercial structures, affected business owners will be compensated for the cost of re-establishing	National legislation provided compensation only for the loss of property and/or structures.	National legislation does not have provisions for the compensation of business owners for the loss of	There is no commercial buildings affected by the land acquisition of the Project. Route selection criteria addressed to avoid potential relocation.

Gap Subject	IFC Standards	Turkish Legislation	Gaps	Responsibilities for filling the gaps
	commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment.		income caused by expropriation.	
Compensation for Loss of Communal Assets	For persons whose livelihoods are natural resource-based and where project-related restrictions on access are envisaged, implementation of measures will be made to either allow continued access to affected resources or provide access to alternative resources with equivalent livelihood-earning potential and accessibility. Where appropriate, benefits and compensation associated with natural resource usage may be collective in nature rather than directly oriented towards individuals or households.	Communal assets are compensated according to Article 30 of Expropriation Law. Article 30 of Expropriation Law No. 2942 articulates that immovable, resources and easement rights owned by public legal persons and agencies may not be expropriated by another public legal person or agency. Properties owned by public institutions cannot be expropriated but only can be a subject to transfer. If there is no transfer in question allowed the dispute is solved in the Supreme Court. There is no compensation for displaced persons benefiting from pasture lands and forest lands.	Communal users of public lands and common properties such as pastures, forestry lands, treasury lands or lands under the jurisdiction of other state bodies (municipalities, etc.) are not recognized and/or compensated.	Access roads to the agricultural lands, forests and pastures will be provided according to demands of local communities. Technical and feasible measures will be explored to provide access to pastures, forests and agricultural lands, and proper passages will be provided to restore access.
Treatment of squatters / informal land users	IFC PS 5 states that Project-related losses of the affected people should be compensated in full and in cash before the actual acquisition of immovable assets or access to land. These users should be added entitled to compensation.	Renters of houses and/or workplaces, tenant users of the land, users of public and forest areas and merchants without immovable property are not entitled to expropriation compensation	There is no compensation in Turkish Law for informal users/squatters on public lands. Eligibility is based on legal ownership of land. Users of such lands are not compensated.	Within the scope of LRP, informal user groups tried to be identified but there are no informal users of affected public lands. There are de facto owners of affected olive gardens. PAPs that have divided lands according to signed agreements (amicable partition), regardless of the land registry records, have been taken into account within the scope of the LRP and will be entitled with public land allocation and cash compensation for affected olive trees at full replacement value in Section 6.0.

Gap Subject	IFC Standards	Turkish Legislation	Gaps	Responsibilities for filling the gaps
Measures for Vulnerable Persons	IFC states that particular attention should be paid to the needs of vulnerable groups, especially those below poverty line, the landless, the elderly, women and children. Livelihood restoration planning should provide special assistance to women, minorities, or vulnerable groups.	Turkish legislation does not specify vulnerable groups under Expropriation Law. However, under the Turkish Constitution, the State guarantees its citizens to continue their lives in peace and security, and also socioeconomically encourages them to reach a higher standard of living. In this context, the State applies several rules and measures to protect and support its needy, weak, helpless, and homeless citizens.	Turkish Land Expropriation Law does not address the vulnerability. While the process considers social issues such as tensions, and neighbourhood relations, it does not specify an approach for vulnerability and does not identify a strategy to ease the transition of vulnerable groups.	Within the scope of LRP, vulnerable groups were identified in Section 7.0and Vulnerability Assistances will be provided.
Transitional Livelihood Support (TLS)	According to PS5, the borrower will provide transitional support to all economically displaced.	Transitional support is available only for the government-led resettlement.	There needs to be a budget available for transitional support.	LRP Fund includes TLS for PAPs whose total land holding significantly (20% and more) affected.
Monitoring and Evaluation (M&E)	M&E is required for projects that cannot avoid physical and/or economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	M&E needs to have a plan and a budget.	LRP includes a M&E section in Section 9.0.
Information Disclosure	IFC emphasizes disclosure of information and expects the Borrower to provide Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.	Public participation meetings are conducted by the requirements of the national EIA Regulation as part of the EIA process. This allows consultation with the Project-affected communities to a certain extent during the scoping phase of the national EIA process. Upon completion, EIA disclosure is compulsory. Public disclosure/information meeting is officially announced 10 days before the meeting.	Disclosure content is limited to EIA and does not include social issues / concerns.	LRP will be disclosed before finalization (See Section 8.0)
Project-level Grievance	Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate	Land acquisition process recognizes the right to object of the PAPs. Objections are recorded and responded to in writing.	There is no grievance mechanism requirement.	The GM will allow the problems of PAPs to be resolved quickly, fairly and transparently without resorting to legal

Gap Subject	IFC Standards	Turkish Legislation	Gaps	Responsibilities for filling the gaps
Mechanisms (GM)	resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.	In the expropriation process under national law, the owner's consent is sought for the immovable property in the first instance but not always consent is achieved, and expropriation becomes compulsory. Expropriation involves compulsory appropriation of the immovable property by the State for public interest. However, Expropriation Law No. 2942 allows that the owner and occupant of the immovable property subject to expropriation and other concerned parties may file actions against the expropriation procedure or appraised values and errors of fact before judicial courts. Reference can also be made to the Law on the Use of the Right to Petition no 3071 and Law on the Right to Information No 4982 Right to Information No 4982 states "Institutions are required to apply administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access to information promptly, effectively and correctly. There is the Presidential Communication Centre (CIMER) which is a central unit where public complaints are handled.		remedies. The functioning of the mechanism is presented in detail in Section 8.0 and the Stakeholder Engagement Plan (SEP) of the project.

3.0 LAND NEED AND ACQUISITION PROCESS FOR PROJECT COMPONENTS

3.1 Land Requirements of the Project

3.1.1 Main Components of the Project

The Project includes approximately 26 km motorway and 23.5 km railway and in total 16 Project units including 1 tunnel, 6 underpasses, 1 overpass, 3 Highway entrance and exit toll gates and 5 culvers. There will be loss of public and private lands since the project execution will require partial or complete acquisition of lands by expropriation. The Project may have economic displacement impact.

In total 81 parcels comprising 55 private parcels and 26 public lands, will be needed, total 1,455,842.95 m2 area (private lands: 616,347.18). Detailed breakdown of the affected parcel numbers by settlements is given in Table 2. Although the lands that will be affected by the Project have been identified, the expropriation process has not started yet.

Table 2: Numbers of Affected Parcels per Settlements

Province	District	Settlement	No. of affected parcels	No. of Private lands	No. of Public lands
Hatay	İskenderun	Karayılan	24	0	24
	Payas	Yakacık	5	3	2
	Kırıkhan	Bektaşlı	5	5	0
	Hassa	Demrek/Deliçay	47	47	0
Total			**81**	**55**	**26**

Source: Available Draft Expropriation Plan, 2024

3.1.2 Temporary Project Facilities

In addition to the main components of the Project, there are also temporary Project facilities that require temporary land use. The locations where these are located are as follows and this LRP also covers these land use impacts.

Table 3: Temporary Project facility affected settlements

Province	District	Settlement	Mobilization Areas / Camp Sites	Dump Sites
Hatay	Payas	Çağlalık		In public land
	Kırıkhan	Bektaşlı	In a private land (Parcel no: 370)	
	İskenderun	Karayılan	In public land	
	Hassa	Yuvalı		In private land

Province	District	Settlement	Mobilization Areas / Camp Sites	Dump Sites
	Hassa	Mazmanlı		In public land

3.2 Acquisition of Private Lands

Although the lands and sizes that will be affected by the project will be identified, the expropriation process has not yet started and asset inventory has not prepared. However, in the LRP preparation field study, assets and trees on the lands recorded and owners and users identified.

Public benefit and urgent expropriation decision will be taken by /AYGM for the project. These decisions show the legal compliance of the project. Census and Asset Inventory studies will be ongoing in line with PS5.

Project construction could be only conducted after the owner or users are offered a compensation package in line with the requirements of IFC PS5, and the compensation is paid.

According to the Turkish Republic Expropriation Law (No: 2942, Year: 1983), the land acquisition stages will take place as presented in Figure 3. AYGM will also include LRP stages in this flow for a land acquisition process in line with IFC standards.

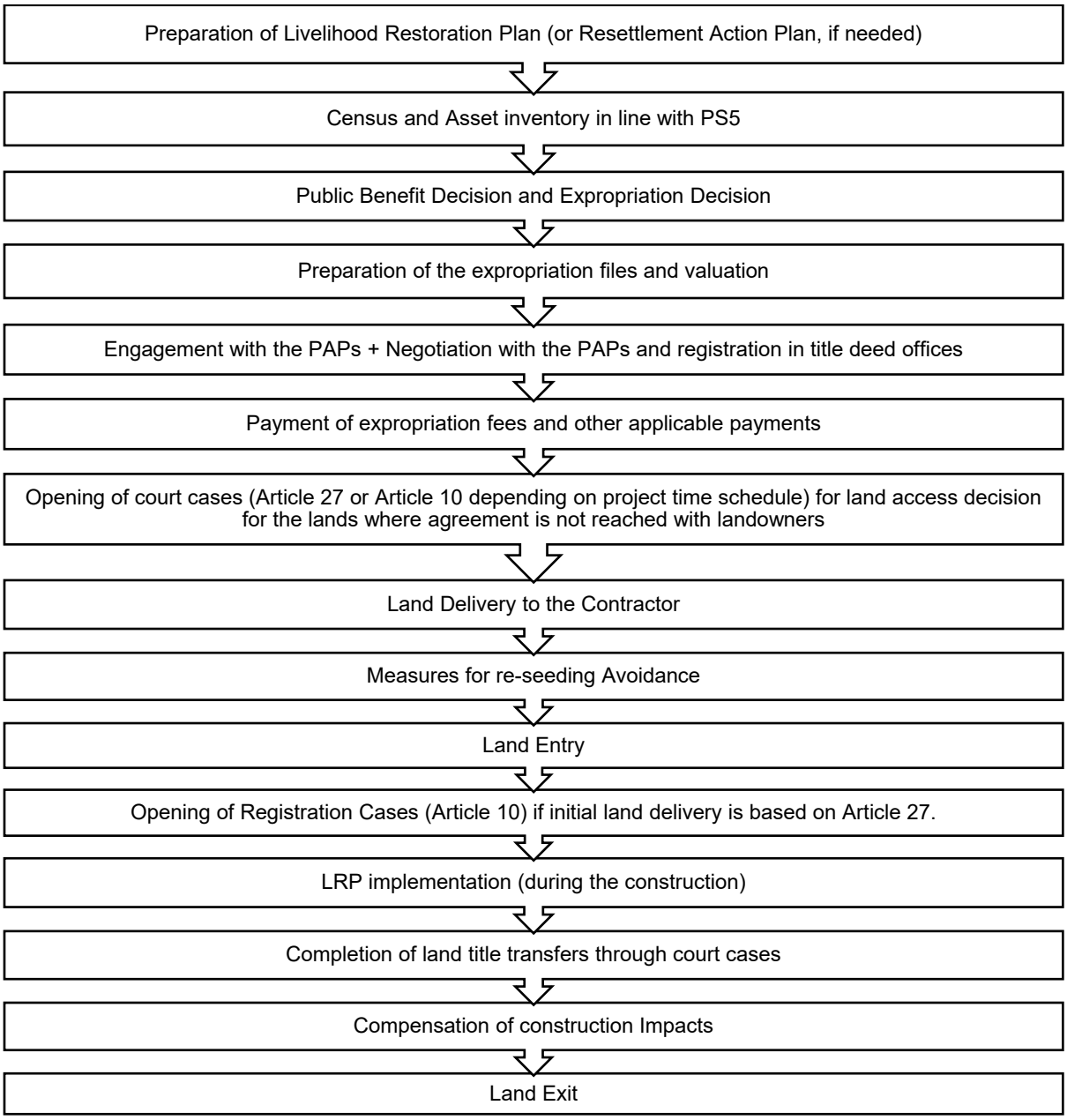


Figure 3: Land take and delivery process

There are three types of land rights to be obtained within the scope of the Project. These are;

- *Permanent Acquisition or Ownership right:* Ownership rights mean permanent land acquisition. The land expropriation is permanent, and the ownership right is registered under the name of the administration. Since a permanent facility will be built on the transferred land, the former owner can not use the land.
- *Permanent Easement Right:* The parcel is not divided; this right keeps the original owner as title deed holder but establishes right (as annotation) in favour of the administration. Since the permanent facility (tunnels or viaducts) passes under or above the transferred land, the landowner will be able to continue using the land with certain restrictions (such as not being able to build houses).

- *Land Rentals through Lease Contracts:* In case of any temporary land need (e.g., for the camp site, storage area) land can be rented for a certain period under the terms and rates mutually agreed between the Contractor and the landowner. After the contract expires, the land will be reinstated and returned to its owner in its original condition.

3.3 National Valuation Methodology

Under the Turkish legal framework, a valuation committee consisting of a minimum of three persons internally appointed by the agency responsible for land acquisition determines the estimated value of the immovable property to be expropriated, having regard to the information and documents to be obtained from expert persons, institutions and authorities.

3.3.1 Valuation for lands (Permanent Acquisition)

Agricultural lands

Net Income Capitalisation is the valuation method used for calculating compensation about the loss of agricultural land in Turkiye.

The net income from Project affected agricultural land is determined based on the following steps:

- Gross income is calculated by multiplying the quantity of the annual crop produced by each land parcel by the crop unit price (e.g., a price per kg) for the relevant valuation year.
- Net income is obtained by subtracting the production costs associated with the annual crop from each land parcel, from the gross income for that crop.

The net income is then multiplied by the capitalisation rate, to obtain the national valuation of the compensation.

The formula used during valuation of the agricultural lands is **R / F = K**[4]

The capitalisation rate is a key metric for the valuation of agricultural land. The net income of affected agricultural land is multiplied by this rate to determine its current value. The average capitalisation rate is calculated by dividing the yield of the crop (determined by the Ministry of Agriculture and Forestry annually, and its Provincial Administrations, each year) by the crop unit price. The independent asset valuation surveyors will then adjust the value of the land parcel depending on the specific characteristics (positive and negative) of the agricultural land being valued. Positive land characteristics will decrease the capitalisation rate, while negative characteristics will increase it.

Factors that positively affect the capitalisation rate (i.e., decrease the capitalisation rate) and therefore increase the calculated value of the agricultural land parcel are as follows:

- Proximity to a city or town;
- Proximity to access roads (land, railway, airway);
- Favourable transportation conditions;
- Buildings (if any) in good condition;

[4] R: Net income (gross income - production costs)
F: the capitalisation rate (risk related to the capital invested in agricultural land)
K: Value (national valuation of compensation)

- Undivided land;
- Smooth and well-shaped land;
- Security and safety of land;
- Ease of purchasing and selling;
- Land having title deed registration;
- Cadastral surveys[56] completed for land;
- High population densities;
- Easily changeable rotational cultivation system (applicability of crop diversity); and
- Favourable irrigation conditions, if it is irrigated land.

Factors that negatively affect the capitalisation rate (i.e. increase the capitalisation rate) and therefore decrease the calculated value of the agricultural land parcel would be the inverse of those listed above.

To ensure the net income capitalisation valuation has been correctly implemented, the independent asset valuation surveyors visit the land parcels to be expropriated to identify both the current land use, and to determine all the factors that may affect the final calculated value of the land parcel as defined in national legislation. This approach identifies the final value required to provide compensation in accordance with national requirements, however, it does not meet full replacement value as required by PS5, and as such additional compensation is required to meet replacement value for agricultural land. The method to meet the compensation requirement in the replacement price is described in Section 6.0 section.

Unviable Lands

If the Project divides a land parcel to the extent that the remaining part(s) are not suitable for further use or access is restricted, then this is becoming an issue in terms of economic benefits or accessibility conditions. For such cases, during the land acquisition process, AYGM pro-actively takes action; evaluates the conditions and will take action prior. AYGM proactively includes unviable lands (small and/or misshaped) in the expropriation amount right from the beginning.

Non-agricultural lands

'Market Comparison Valuation Method' is the methodology used for calculating the value of non-agricultural land parcels in Türkiye. This valuation method for non-agricultural land parcels, defined explicitly in national legislation, is calculated by comparing the land parcel being valued to the sale prices of non-agricultural land parcels with similar characteristics.

3.3.2 Valuation for permanent easement

By national legislation, an easement can be granted for a certain portion of a land parcel (or elevation/depth over/underground level) instead of expropriation. Easement agreements do not require the owner of the land to be changed in the name of the administration, and that the integrity of the land is maintained (agricultural and non-agricultural land).

The easement cost is calculated, in accordance with national legislation, as the difference between the value of the land before and after the investment. The loss in value of the land due to the easement will be derived from the lost economic potential of the land.

It should be noted the court practises (precedents) restrict the permanent easement value to 50% of permanent acquisition value for non-agricultural lands and that 35% for agricultural lands.

3.3.3 Valuation for standing crops

The valuation for affected crops is calculated based on the actual annual crop unit price values which can vary from year to year. The actual seasonal crop values are announced by the Ministry of Agriculture and Forestry and announced annually. However, the product unit prices published in the official gazette belong to the previous year and the inflation rate has been high in Türkiye and throughout the world in recent periods.

Allowing the harvest of standing crops as much as possible is the primary method.

3.3.4 Valuation for affected trees

As per the Expropriation Law, a full tree count is carried out as part of the asset inventory update for each land parcel. This count records the type, age and diameter of all trees and other fixed assets in the expropriation corridor for the Project preferably with the property owners where possible. The national valuation method for compensating the value of a tree, is based on the following two criteria:

- Timber value; and
- Number of fruits produced by the tree.

The calculation of the timber value of a tree, and the average amount of fruit production, is informed by details such as the type, diameter, length and volume of the tree. The annual gross income from the tree is calculated based on the sum of the timber value and the income from the fruit sales (at average regional prices per standardised weight). The net income is then calculated by subtracting the cost of maintaining the productivity of the tree and the surrounding area, from the annual gross income.

The final value calculated for affected trees meets national requirements, however, if it does not meet PS5 requirements, and as such additional compensation is required for affected trees as described in Section 6.0.

3.3.5 Valuation for residential and non-residential structures

The valuation of residential and non-residential structures to be expropriated will be carried out by asset valuation surveyors under national legislation using set unit prices. These valuations will be based on the official unit prices of structures made from different primary materials (such as stone, brick, or wood) published annually by the Ministry of Environment, Urbanisation and Climate Change. These cost prices paid to the owner are prepared in line with the cost method which considers the completion ratio, cost of depreciation and debris.

The final value calculated for residential and non-residential structures for payment to the owner meets national requirements, however, it does not meet PS5 requirements, and as such additional compensation is required for non-residential structures which are to be expropriated (there is no affected residential buildings in this project). Detailed information on additional compensations and other entitlements is presented in Section 6.0.

3.4 Acquisition of Public Lands

AYGM will also undertake the acquisition, transfer and entry of land registered with other government departments.

3.4.1 Forestlands

Forest land (wholly owned by the Ministry of Agriculture and Forestry) will be purchased through long-term lease (49 years) agreed by the local Forestry Directorates. Subsequent permissions are obtained for AYGM.

3.4.2 Treasury Lands

The acquisition of Treasury land is processed by correspondence and no payment is made for these plots.

3.4.3 Lands belonging to other public institutions

Land owned by other state authorities (such as municipalities, Water and Sewerage Administration, General Directorate of Highways) is subject to Article 30 of the Land Acquisition Law. This process is very similar to private land ownership, but the negotiation is carried out in written correspondence. If the price offer made by AYGM is accepted by the authority, meaning that agreement is reached, then payment is made and title deed transfer to AYGM is completed. In case the owner entity does not consent or respond within 60 days to the petition, AYGM shall approach the Council of State of Appeals (“Danıştay”) to resolve the issue within 60 days (in line with the Article 30 of the Expropriation Law). The relevant public landowner may accept the transfer of right but may object to the land value. In this case, the Article 10 court process will be applied.

3.4.4 Pasturelands

Land allocated for pasture will be acquired through changing the status from pastureland to Treasury land and will be treated as Treasury land.

3.4.5 Common Lands of the Villages

Land allocated to the villages will be acquired through changing the status from pastureland to Treasury land and will be treated as Treasury land.

4.0 DATA COLLECTION METHODOLOGY

4.1 Objective

The LRP methodology has three main purposes:

1) Conducting statistical analysis to determine the land acquisition and land use impacts of the project in advance and managing economic resettlement to minimize the identified impacts on directly affected households.

2) Preparation of a Census in accordance with international standards by identifying all households and communities affected by the project's land acquisition (Appendix A).

3) Identify community level measures to manage the adverse impacts of the project's permanent and temporary land use on settlements and livelihoods of people indirectly affected by the project.

4.2 Data Sources

The main strategy of this LRP is to bridge the gaps between national legislation and IFC standards against economic displacement. The socio-economic impacts of the Project's land acquisition were identified to plan the implementations necessary to close these gaps. A participatory approach was adopted in identifying these impacts, and a field study was planned based on consultations with the owners, users, beneficiaries of the lands affected by the land acquisition of the Project.

Primary data collection activity was carried out by an expert team in Project Affected Settlements (PASs) between **1-6 August 2024** dates. Data sources of field studies include;

- Structured interviews (survey) with directly and indirectly PAPs affected by the land acquisition of the project,
- Structured interviews (survey) with representatives (mukhtars) of PASs.

In this context, questionnaires were prepared for LRP. The target groups and the contents of the questionnaires are presented in the table below.

Table 4: Contents and target groups of LRP consultations

Data Collection Tool	Target group	Content
Community Level Survey (CLS)	Mukhtars of the Project Affected Settlements (PASs)	• Information sharing about affected lands including common properties and people • Population • Seasonal labour • Livelihood • Opinions about the project impacts
Household Level Survey (HLS)	-Land (parcel) based directly affected Project Affected People (PAPs) including formal/informal users of the affected lands	• Affected private lands • Affected fixed assets • Affected public land and common property

Data Collection Tool	Target group	Content
		• Household demographic and socio-economic characteristics • Land ownership, agriculture and livestock

4.3 Sampling

Since the LRP is based on an identification study, the basic sampling strategy was full census. The sampling strategy for surveys is presented in Table 5. In these interviews, both community level information was obtained, and land users (formal and informal) were identified and recorded in Appendix A - Asset Inventory and Census.

Table 5: Sampling Strategy

Survey	Sampling	Implementation
CLS	Full census The mukhtars of 4 settlements based on the available expropriation data	Semi-structured community level questionnaires with the 3 mukhtars in PASs but the mukhtar of Yakacık could not be included in the CLS application.
HLS	Full census The owners and users of affected 55 private parcels. The part of Bektaşlı parcel number 370 affected by the project has been divided into 18 parts in practice (18 olive gardens). For this reason, parcel number 370 is evaluated as 18 olive gardens used by 14 PAPs. 54 private lands + 1 land with 18 gardens = 72 private lands and gardens considered. There is no public lands used by local people. The number of affected public lands is 26 and used by Isdemir and TCDD.	41 owner/user households of 54 affected private lands and gardens. Owners or users of 5 private lands could not be reached. Owners or users of 13 private lands were purchased for investment purposes by people who were not members of the local community. Therefore, the landowners are not known in the region.

4.4 Limitations

4.4.1 Gender issues

Women did not want to answer HLS questions due to the high number of the questions parcel-based and related to agricultural activities. Therefore, household-based data were obtained predominantly from male household representatives.

4.4.2 Expropriation issues

Since the expropriation process had not yet started, PAPs did not have any official information. Therefore, they did not want to answer some questions.

4.4.3 Ownership problems

Although some lands had many owners in the title deed, they were being shared with signed agreements and used by fewer owners. In this case, the owners of the lands who were users were included in the HLS.

4.4.4 Bektaşlı Parcel No: 370

Parcel number 370 located in Bektaşlı settlement of Kırıkhan district of Hatay province is a large land with an area of 5,286,901.77 m2. 268.343,50 m2 of the land will be used due to the land needs of the project (%5,08). Over the years, villagers/relatives have used this land by dividing it with signed agreements and in practice, but this division process has not been reflected in the official land registry records. The land, which has been used in this way for many years, has 381 shareholders today. The majority of these are people who have no relation to the land, live in other provinces and have not continued agricultural activities, and their children/grandchildren. There are 18 pieces of land (18 olive gardens) in the part where parcel number 370 intersects with the project. The number of people/households who continue to use these gardens as a source of income, who are “on the land” is 14. All of these users have been identified and included in HLS and are registered as eligible in Appendix A. Asset Inventory and Census.

5.0 AFFECTED SETTLEMENTS, HOUSEHOLDS, LANDS, ASSETS, LIVELIHOODS AND IMPACT ASSESSMENT

5.1 Project affected settlements (PASs)

There are four (4) settlements affected by the land acquisition of the project. In two of these settlements (Karayılan, Yakacık), public lands mostly used by Isdemir are affected (Tunnel entry). In Bektaşlı and Demrek, especially land-based livelihood activities especially olive gardening is affected (Tunnel exit). More detailed information and population projections regarding the settlements affected by the project are presented in ESIA.

Table 6 Affected settlements and lands

Province	District	Settlement	Tunnel Route	Number of lands	Type of the lands
Hatay	Kırıkhan	Bektaşlı	Exit	5 private lands	Agricultural
Hatay	Hassa	Demrek	Exit	47 private lands	Agricultural
Hatay	İskenderun	Karayılan	Entry	24 public lands	Industrial
Hatay	Payas	Yakacık	Entry	3 private and 2 public lands	Industrial

Source: Available expropriation list, 2024

The lands at the tunnel entrance are industrial parcels, while the lands at the tunnel exit are **agricultural lands**. When it at the community level land acquisition impacts are reviewed, the roads of industrial facilities are affected in the settlements at the tunnel entrance (Karayılan and Yakacık). The measures related to the roads were examined within the scope of ESIA. At the tunnel exit, the community level impacts are related to access to common properties and ecosystem services such as pastures and forests. These activities are not common in the settlements. Therefore, land acquisition impacts are more intense at the household level rather than the community level in the settlements at the tunnel exit (Bektaşlı, Demrek).

5.2 Affected Private Lands

Of the 81 lands affected by the project's land acquisition, 55 are private lands.

41 PAPs, who are the owners and users of the 55 affected private lands, were included in the survey. The distribution of private lands by location is presented in the table below. All of the lands are field and garden. However, since the area where the lands are located is an industrial zone, some lands were purchased for investment purposes by people who are not members of the local community and there is no agricultural activity on them.

Table 7: Using statuss of the affected lands

Province	District	Settlement	Number and types of the lands	Using explanation
Hatay	Kırıkhan	Bektaşlı	5 private agricultural lands	Lands used by PAPs. In one of private land, there are 18 olive gardens divided by signed agreements (de facto owners).
Hatay	Hassa	Demrek	47 private agricultural lands	Fields and olive gardens used by PAPs and some of lands purchased by investors for non-agricultural purpose.
Hatay	İskenderun	Karayılan	24 public industrial lands	Lands owned/used by TCDD, KGM, Isdemir.
Hatay	Payas	Yakacık	3 private and 2 public industrial lands	Lands owned/used by TCDD and Isdemir.

Source: LRP preparation field study, 2024

According to PAPs, the project's land acquisition adversely affects agricultural activities (95%).

Table 8: Responses to the question "Do you think your agricultural activities will be negatively affected by the land acquisition of the project?"

Answer	Frequency	Percent
Yes	38	95
No	2	5
Total	**40**	**100**
No answer	*1*	
Grand Total	*41*	

Source: LRP preparation field study, 2024

Respondents were given multiple response options regarding the reasons for the negative impacts. A total of 125 responses were received from 38 PAPs who expected negative impacts. The expected negative impacts are as follows.

Table 9: Expected adverse impacts on agricultural activities

Type of impact on agricultural lands	No. of answers
Decline in agricultural activity due to land loss	37
Access and irrigation problems due to land division	32
Land value loss	27
Damage to crops due to dust from construction	27
Affecting the surroundings of the house	2

Source: LRP preparation field study, 2024

5.2.1 Significantly affected PAPs

Some groups may be more adversely affected by the land acquisition project than others. For these groups, compensation at full replacement cost will not be sufficient. Therefore, additional support strategies have been developed within the scope of this LRP (for details see Section 6.0).

The distribution of lands according to acquisition rates in the draft expropriation plan is presented in Table 10 below. Accordingly, 67.9% of the lands have 20% or more impact. 23 of these 55 lands are within the borders of Karayılan and Yakacık settlements and are industrial and public parcels used by Isdemir (Entry of the tunnel). One land is industrial type land belonging to individuals in Yakacık. The remaining 31 lands are agricultural lands within the borders of Demrek and Bektaşlı (Exit of the tunnel).

Table 10 Impact rates on the affected lands

Impact rates on the lands	N	%
100%	28	34,57
Between 100% - 70%	4	4,94
Between 70% - 40%	9	11,11
Between 40% - 20%	14	17,28
Between 20% - 10%	8	9,88
Under 10%	18	22,22
Total	**81**	**100,00**

Source: Available draft expropriation plan, 2024

Accordingly, 67.9% of the lands have 20% or more impact. 23 of these 55 lands are within the borders of Karayılan and Yakacık settlements and are industrial and public parcels used by İsdemir (Entry of the tunnel). One land is industrial type land belonging to individuals in Yakacık. The remaining 31 lands are agricultural lands within the borders of Demrek and Bektaşlı (Exit of the tunnel).

Table 11 Types of the lands affected 20% or more

Types of the lands affected 20% or more	N	%
No. of industrial public lands affected 20% or more	23	41.82
No. of industrial private lands affected 20% or more	1	1.82
No. of agricultural private lands affected 20% or more	31	56.36
Total	**55**	**100**

Source: Available draft expropriation plan, 2024

Farmers whose total land holdings affected by the Project more than 20% are considered “significantly affected PAPs” in this Project. The impacts on the total land holdings of PAPs, who are users of 31 lands, were examined within the scope of the LRP. Five PAPs with more than 20% of the total land area affected were identified (Table 12) and recorded in Appendix A. This identification was made based on the declaration. Once documented during the LRP implementation, they will be eligible for the compensations offered in Section 6.0. Farmers who think that 20% or more of their total land holdings are affected by the land acquisition of the project can initiate an investigation by submitting their e-

government data showing their total land assets to the project management via CLOs. If it is determined that the impact on a farmer's total land assets is significant, they will be eligible for the LRP entitlements.

Table 12 PAPs whose total land holdings may be affected more than 20%

District	Settlement	Parcel no	Total size (m2)	Acquisition size (m2)	Acquisition rate (%)	PAP	Total land holding (per declaration)	Impact rate on total land holding (%)
HASSA	DEMREK	379	49200	36061,81	73,3	User	90000	40,06868
HASSA	DEMREK	410	23200	23200	100	User	80000	29
HASSA	DEMREK	411	17600	17600	100	User	17600	100
HASSA	DEMREK	412	18100	6624,23	36,6	User	28000	23,65796
HASSA	DEMREK	901	27924,31	16051,38	54,48	User	30000	26,7523

Source: Available Draft Expropriation Plan and LRP field study, 2024

The size of the land affected by the project may be less than 20% of the total land assets. However, if the affected land is more fertile, contains olive trees or remains unviable, the impact rate can be accepted as 20%. Unviable land is added to the total amount of affected land and thus the impact on the total land assets is recalculated.

5.3 Affected Public Lands

Of the 81 lands affected by the project's land acquisition, 26 (public) are used by Isdemir and TCDD. There are no informal users on these lands.

Of the 41 PAPs participating in the HLS application, 7 declared that they used public lands. However, public lands used by local people are not affected by the project. Therefore, informal users were not identified in this project.

Table 13 Using public lands

Answers	Frequency	Percent
Yes	8	20
No	32	80
Total	**40**	**100**
No answer	*1*	
Grand total	*41*	

Source: LRP preparation field study, 2024

5.4 Olive Gardens

There are olive trees of various ages and numbers in 45 of the lands affected by the project. Therefore, the most important impact of the project's land acquisition is on olive production. Minimizing the impacts on olive production and the livelihoods of olive producing households is one of the main objectives of this LRP. 30 households engaged in olive cultivation have been identified. Their olive production objectives are as follows.

Table 14 Purpose of olive production

Answers	Frequency	Percent
For Sale	14	46,7
Household Consumption	1	3,3
Both Sale and Household Consumption	15	50
Total	**30**	**100**
No production	*11*	
Grand total	*41*	

Source: LRP preparation field study, 2024

These trees can be moved to other lands of the owners of the trees. However, PAPs consider this transfer process to be inefficient. Therefore, the relocation process can only be done upon the request of PAP after full replacement cost compensation is paid for the trees.

5.4.1 Dust impact on the olive trees

Dust impact has been a significant concern for PAPs and mukhtars in terms of the olive production. The Mukhtar of Deliçay stated that the olive production was significantly negatively affected by dust during the construction of mass housing for earthquake survivors whose houses were destroyed near the village. This is because the olive flowers that bloom, especially in the spring, cannot get air due to the dust sticking to them and therefore the olive harvest has decreased. It has been expressed that a similar negative impact will be experienced due to dust impact from the project construction. These negative impacts have been taken into account as “harms and damages” in LRP and measures such as irrigation and crop payment have been defined (see Section 6.0). For the claims of PAPs that the yield has decreased due to dust originating from the Project, institutional cooperation will be established for the measurement and evaluation of olive yield by provincial or district agricultural experts.

5.4.2 De facto owners of olive gardens (especially in parcel no: 370)

Parcel number 370 located in Bektaşlı settlement of Kırıkhan district of Hatay province is a large land with an area of 5,286,901.77 m2. 268.343,50 m2 of the land will be used due to the land needs of the project (%5,08). Over the years, villagers/relatives have used this land by dividing it with signed agreements and in practice with 'amicable partition', but this sharing process has not been reflected in the official land registry records. The land, which has been used in this way for many years, has 381 shareholders today. The majority of these are people who have no relation to the land, live in other provinces and have not continued agricultural activities, and their children/grandchildren. There are 41 pieces of land (olive gardens and fields) in the part where parcel number 370 intersects with the project. The number of identified people/households who continue to use these gardens as a source of income, who are “on the land” is 42. 14 of them who is user of 18 gardens are included in the HLS application. Other PAPs have been identified and are presented in Appendix A.

A comprehensive study was carried out on the map to identify all users. Accordingly, the number of identified olive gardens and fields are 41, excluding **five unidentified areas**. The first of these is the area used by the people living in Balarmudu Village before Highway KM 24. The second is the mobilization area-2 on Highway KM 23. The third “unidentified” area is before Highway KM 22. The fourth and fifth de facto owner identification could not be done and the areas located within the boundaries of parcel number 370 are between railway KM 22 and KM 23.

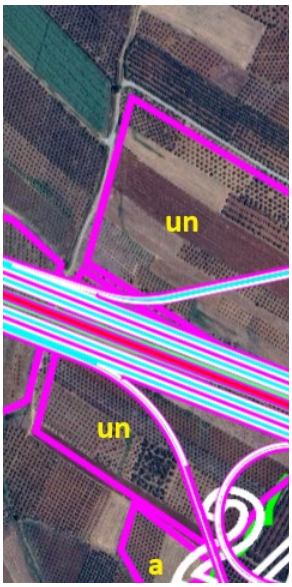


Figure 4 Unidentified area 1 (before KM 24 of highway) in Parcel no: 370



Figure 5 Unidentified area 2 (Mobilization Area-2) in Parcel no: 370



Figure 6 Unidentified area 3 (before KM 22 of highway) in Parcel no: 370



Figure 7 Unidentified area 4 and 5 (Railway between KM 22-23) in Parcel no: 370

The aim of the study conducted on the map with the participation of PAPs to determine the boundaries of lands that are not divided in the land registry but are actually divided by signed agreements is to identify the owners of lands (most of which are olive gardens) that are at risk of not being entitled according to the National Expropriation Law and, and to identify eligible PAPs (de facto owners) who will be compensated within the scope of the LRP (for details see Section 6.0). During the LRP implementation, these studies will be supported by the agreements signed between PAPs. During the

implementation phase, regardless of the PAPs' applications, DOĞUŞ-EZE JV will work to ensure that PAPs reach their entitlements. Especially elderly and vulnerable PAPs will be visited and informed about their rights.

5.4.2.1 Identified gardens and de facto owners between KM 23 – 24 of Highway

12 divided lands were identified between KM 23-24 of the highway. The owners of these lands are listed in Appendix A according to the letters given on the map below. In an area just before the 24th Kilometre, there is an unidentified area divided by people living in Balarmudu village (expressed as "un" on the map) and de facto owner identification has not been done yet. This work is being carried out by DOĞUŞ-EZE JV.

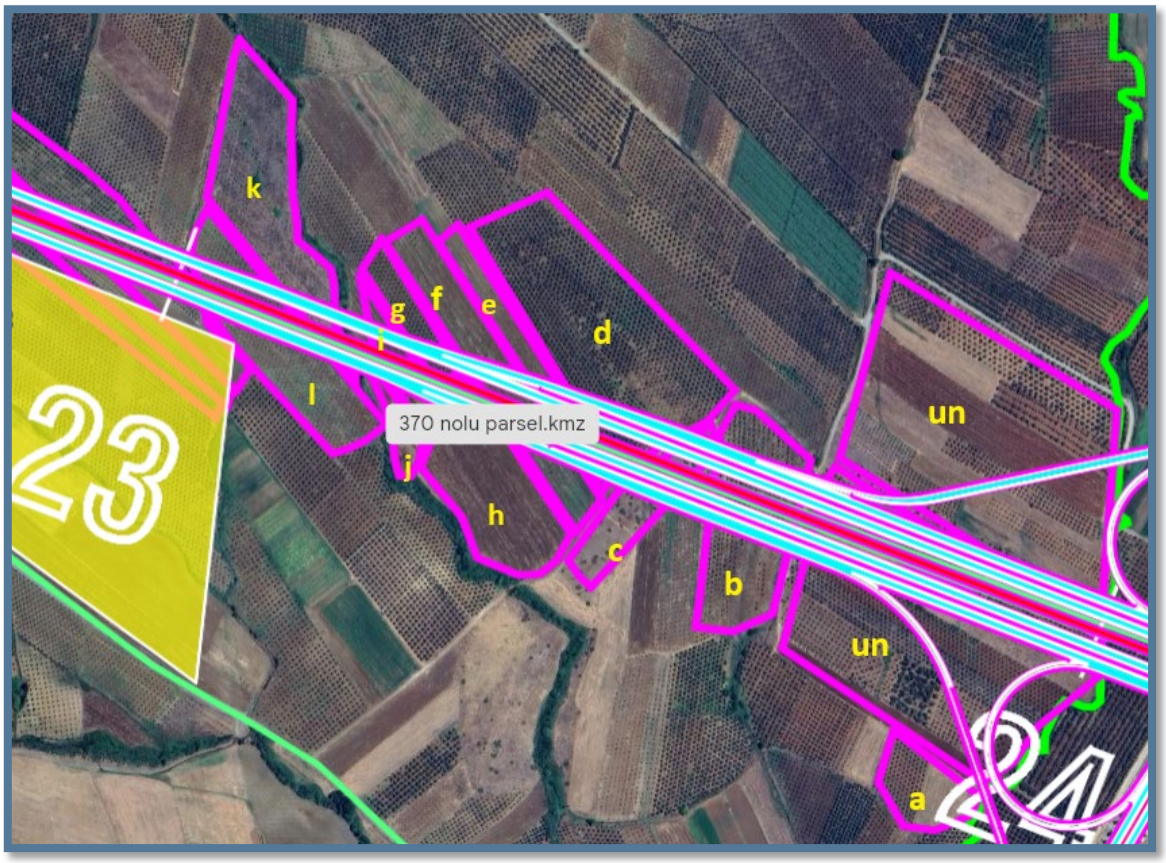


Figure 8 Identified gardens between KM 23-24 (highway) in Parcel no: 370

5.4.2.2 Identified gardens and de facto owners between KM 22 and 23 of Highway

10 divided lands were identified between KM 22-23 of the highway. The owners of these lands are listed in Appendix A according to the letters given on the map below. Since the land acquisition of mobilization area 2 located at KM 23 has not been clarified yet, the de facto owners in this area have not been identified yet (Unidentified area 2).

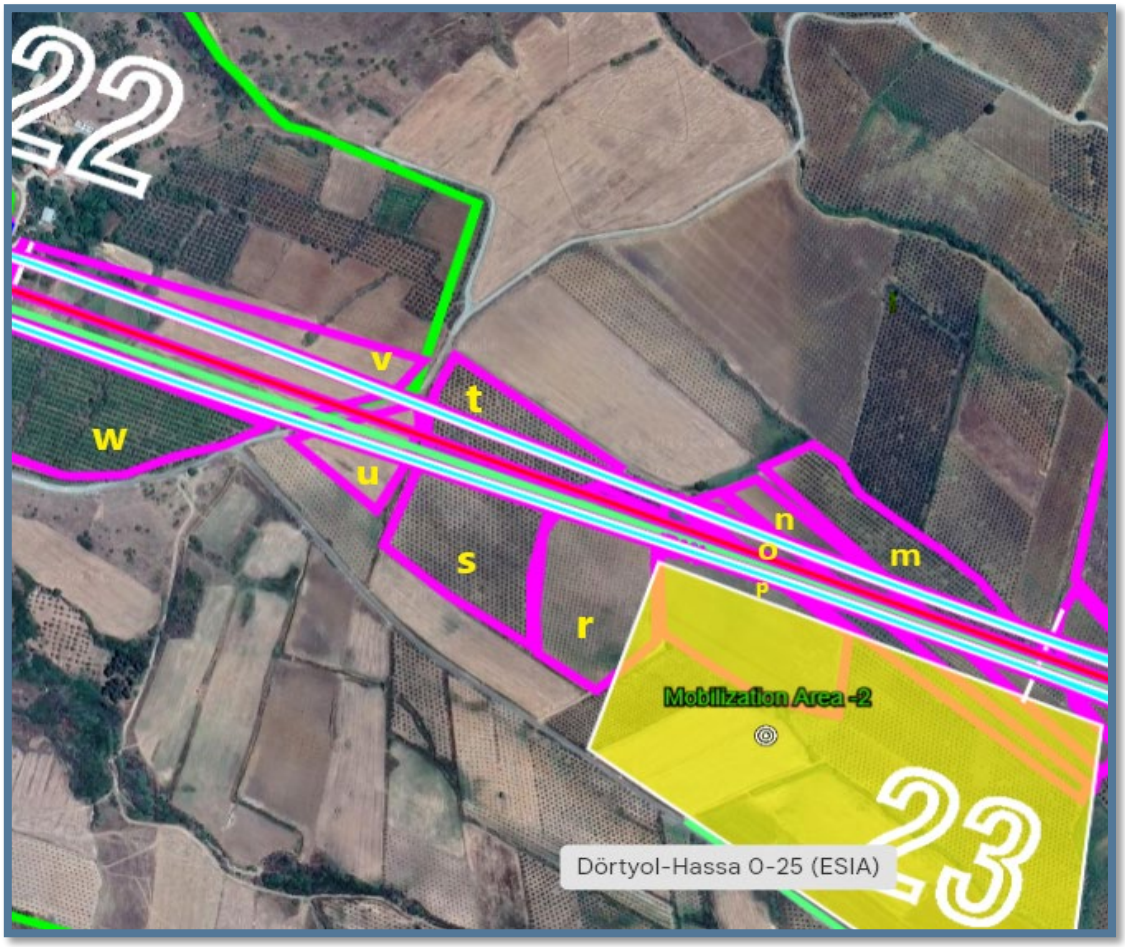


Figure 9 Identified gardens between KM 22-23 (highway) in Parcel no: 370

5.4.2.3 Identified gardens and de facto owners between KM 21-22 of Highway

10 divided lands were identified between KM 21-22 of the highway. The owners of these lands are listed in Appendix A according to the letters given on the map below. The de facto owners in the area marked as “un” on the map below have not yet been identified (Unidentified area 3), but it is known that PAPs live in Balarmudu village.

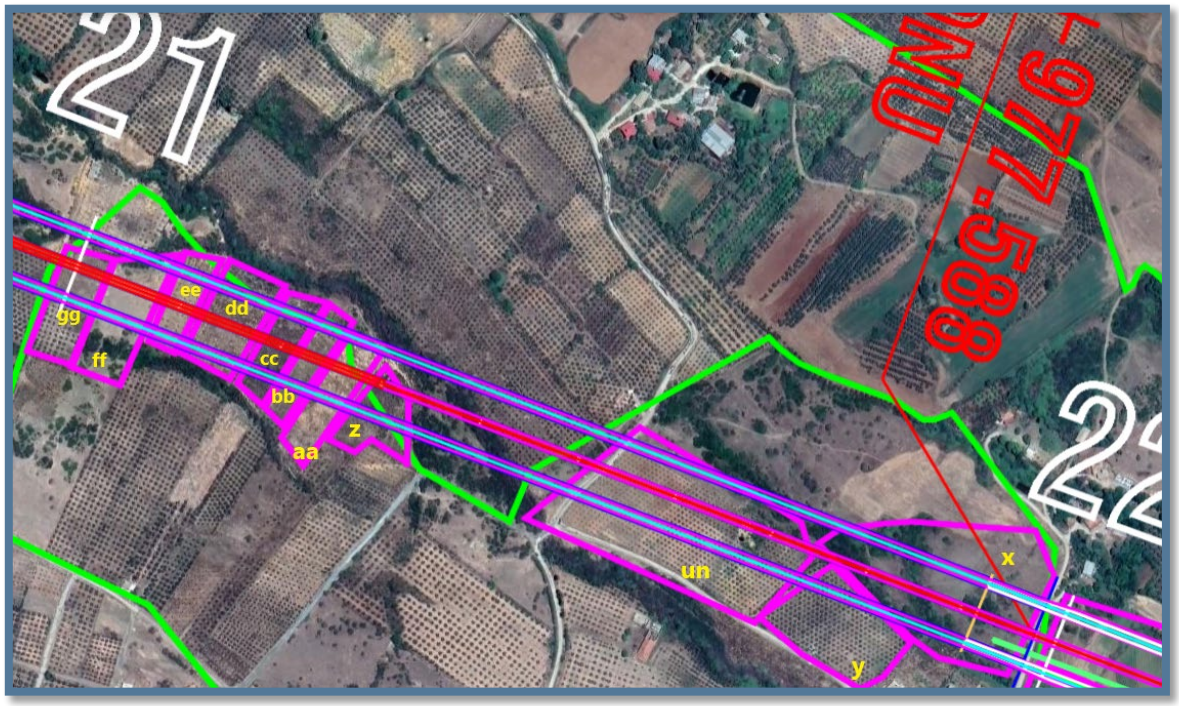


Figure 10 Identified gardens between KM 21-22 (highway) in Parcel no: 370

5.4.2.4 Identified gardens and de facto owners between KM 21-22 of Railway

9 divided lands were identified between Railway KM 22-23. Owners of these lands are listed in Appendix A according to the letters given in the map below. De facto owners in the areas marked as “un” in the map below have not been identified yet (Unidentified area 4 and 5). It was learned that the users (de facto owners) of Unidentified area 4 live in Dedeçınar village, while the users of Unidentified area 5 are the Pektaş family living in Bektaşlı village, but they could not be included in the HLS application within the scope of LRP preparation studies. Identification studies will be completed by DOĞUŞ-EZE JV.



Figure 11 Identified gardens between KM 22-23 (railway) in Parcel no: 370

5.5 Common Properties and Beneficiary

5.5.1 Pasturelands and Animal Husbandry

Livestock farming is not common in the region. Some farmers graze their small number of animals between the olive trees for cleanliness purposes. PAPs were asked whether they use common pastures. 5 PAPs use pastures.

Table 15 Pasture use of PAPs

Answer	Frequency	Percent
Yes	5	13,5
No	32	86,5
Total	**37**	**100**
No answer	*4*	
Grand total	*41*	

Source: LRP preparation field study, 2024

Pastures are not affected by the land acquisition of the project. However, livelihood activities may be negatively affected if there are barriers to access to pastures or grazing areas. Therefore, technical and feasible measures will be explored to provide access to pastures, forests and agricultural lands, and proper passages will be provided to restore access.

5.5.2 Beneficiaries of Forestlands and Natural Resources (Ecosystem services)

The 4 lands affected by the project are forested, but these lands are not available for use by local people because they are lands used by İsdemir. Forest benefiting activities may also be affected by the restriction of forest access. Therefore, benefiting activities were also examined. 11 PAPs declared that they benefit from the forests. Thyme, wild herbs, mushrooms and wood are taken from the forests. Some products are taken from the tunnel exit area. Therefore, forest utilization is included in the LRP.

Table 16 Forest use of PAPs

Answer	Frequency	Percent
Yes	11	29,7
No	26	70,3
Total	**37**	**100**
No answer	*4*	
Grand total	*41*	

Source: LRP preparation field study, 2024

PAPs' expectations regarding the impact of the project on forest and natural product utilization activities are as follows.

Table 17 Impact expectation on forest/natural production benefiting activities

Answer	Frequency	Percent
Yes	6	54,5
No	5	45,5
Total	**11**	**100**
No forest use	*26*	
No answer	*4*	
Grand total	*41*	

Source: LRP preparation field study, 2024

5.6 Affected Structures

5.6.1 Buildings / houses on the affected lands

There are buildings on one parcel (Bektaşlı Parcel No: 54) affected by the Project. However, the impact on the buildings is avoided. If avoidance is not possible, a RAP will be prepared independently of this LRP.

5.6.2 Container Area near to Project components

There is a container area used by earthquake-affected workers on the lands used by Isdemir out of expropriation area of the project. This container area near the lands to be acquired of the project.

Although the consultation process regarding this area could not be conducted with İsdemir officials during the LRP preparation field study, within the scope of the field work for Environmental and Social Due Diligence (ESDD), a stakeholder meeting was held between DOĞUŞ-EZE JV, WSP Türkiye, Lenders, Lenders Consultant (RINA) and İsdemir managers. In the meeting, İsdemir management stated that they would move these containers themselves and that this area was a temporarily established area.



Figure 12: Container area on Isdemir's lands out of expropriation area of the project

5.6.3 Other Structures

There are non-building structures on the lands affected by the project. 46 of the lands that can be included in the HLS application have various structures.

Table 18 Structures on the affected lands

Any structure?	Frequency	Percent
Yes	46	76,7
No	14	23,3
Total lands	**60**	**100**

Source: LRP preparation field study, 2024

An official asset inventory study has not yet been conducted for the lands affected by the project. Once this study is completed, the assets under impact on the lands will be recorded. However, the structures identified in the LRP preparation study based on the declaration and to be verified with the asset inventory are listed below. Irrigation systems will be compensated, and displacement operations will be carried out by the Contractor.

Table 19: Structures on the affected lands

Province	District	Settlement	Parcel	Structures
Hatay	Kırıkhan	Bektaşlı	370 (1)	Irrigation Pond - Irrigation pipe from Deliçay pond
Hatay	Hassa	Bektaşlı	370 (2)	Drip irrigation
Hatay	Hassa	Bektaşlı	370 (3)	Drip irrigation, wire fence
Hatay	Kırıkhan	Bektaşlı	370 (4)	Drip irrigation and Wire mesh
Hatay	Kırıkhan	Bektaşlı	370 (5)	Drip irrigation
Hatay	Hassa	Bektaşlı	370 (6)	Drip irrigation, wire fence
Hatay	Kırıkhan	Bektaşlı	370 (7)	Drip irrigation - Pool
Hatay	Kırıkhan	Bektaşlı	370 (9)	Drip irrigation pipe
Hatay	Kırıkhan	Bektaşlı	370 (10)	Drip irrigation
Hatay	Kırıkhan	Bektaşlı	370 (11)	Drip irrigation
Hatay	Kırıkhan	Bektaşlı	370 (12)	Pool (filled from source), Drip irrigation system
Hatay	Kırıkhan	Bektaşlı	370 (13)	Garden drip irrigation system
Hatay	Kırıkhan	Bektaşlı	370 (14)	Pool irrigation system
Hatay	Kırıkhan	Bektaşlı	54	Irrigation system
Hatay	Kırıkhan	Bektaşlı	54	Irrigation and Drip system
Hatay	Kırıkhan	Bektaşlı	54	Water well
Hatay	Kırıkhan	Bektaşlı	370 (15)	Irrigation system
Hatay	Kırıkhan	Bektaşlı	370 (16)	Water well - Irrigation system
Hatay	Kırıkhan	Bektaşlı	370 (17)	Drip irrigation and pool
Hatay	Hassa	Deliçay (Dernek)	306	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	310	Drip irrigation and another system

Province	District	Settlement	Parcel	Structures
Hatay	Hassa	Deliçay (Dernek)	358	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	360	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	370	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	379	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	748	Drip Irrigation
Hatay	Kırıkhan	Bektaşlı	370 (18)	A pipe comes from the pond
Hatay	Kırıkhan	Bektaşlı	489	There is a water well in the plot, water is drawn by the pipe. There is a flood irrigation system.
Hatay	Hassa	Deliçay (Dernek)	372	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	386	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	379	Drip Irrigation and a water line system coming from the pipe
Hatay	Hassa	Deliçay (Dernek)	409	Drip Irrigation and a water line system coming from the pipe
Hatay	Hassa	Deliçay (Dernek)	411	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	412	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	484	Drip Irrigation and source water extraction system
Hatay	Hassa	Deliçay (Dernek)	485	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	487	Drip Irrigation
Hatay	Hassa	Deliçay (Dernek)	748	Irrigation System
Hatay	Hassa	Deliçay (Dernek)	488	Water well
Hatay	Hassa	Deliçay (Dernek)	473	Water well

Source: LRP preparation field study, 2024

6.0 LIVELIHOOD RESTORATION AND COMPENSATION STRATEGY

6.1 Physical Resettlement Strategy

6.1.1 Avoiding Physical Displacement

The Project's physical resettlement strategy is to avoid relocation in accordance with the IFC PS5.

6.1.2 Preparing a Resettlement Action Plan

There are two areas with a risk of physical resettlement. No impact has been detected yet. If avoidance is not possible, a project-specific RAP will be prepared:

- There is also a container area used by earthquake-affected workers on the lands used by Isdemir.
- Hatay, Kırıkhan, Bektaşlı, Parcel no: 54 has 6-7 houses.

There are no buildings or houses affected by the land acquisition of the project. However, if physical resettlement is required due to construction impacts (dust, noise, vibration, community health and safety, etc.), a Resettlement Action Plan (RAP) specific to the project will be prepared.

The techniques used in tunnel construction may cause cracks in the surrounding houses due to vibration. Therefore, the surrounding houses will be examined before construction and their current conditions will be recorded with the expert reports in detail. After the construction works, the houses of the PAPs who reach DOĞUŞ-EZE JV through the Grievance Mechanism (GM) and declare that cracks have occurred in their houses due to construction works will have their houses examined again by experts and a report will be prepared on the cause and magnitude of the cracks. If it is determined that the cracks are caused by project activities, repair services will be provided from the LRP fund. In case the magnitude of the cracks is high, a RAP will be prepared to carry out a physical resettlement process in accordance with PS5 for houses at risk of collapse.

6.2 Economic Resettlement Strategy

6.2.1 Main Principles

6.2.1.1 Avoiding economic displacement

The Project’s preliminary economic displacement strategy is to avoid economic displacement in accordance with PS5. For this reason, following principles are adopted:

- Avoiding damage to cultivated crops (waiting for the harvest),
- Avoiding construction activities or taking precautions against dust emission during crop sensitive periods,
- Avoiding damage to trees out of expropriation area,
- Avoiding damage to irrigation systems,
- Avoiding agricultural access closures,
- Avoiding animal access closures.

The construction calendar will be shared with the mukhtars of the PASs by the Project, so that the farmers can harvest their crops. Waiting for the standing crops to be harvested will be the priority method. When this is not possible, compensations will be provided for standing crops (details are presented below).

GM submissions will be diligently reviewed to safeguard the crops within the Project zones from dust-related damages. Adequate precautions will be implemented to limit dust impact, yet compensation will be provided for any crop damage caused by dust. The commitments to these procedures will be detailed in construction subcontracting agreements.

Damage to the irrigation systems in the area subject to expropriation affects the irrigation of the remaining areas. For this reason, deteriorated irrigation systems will be fixed. Irrigation systems will be repaired. Necessary measures will be taken to ensure that subcontractors do not damage irrigation systems and will be guaranteed by contracts. If irrigation and access restriction and dust impacts cannot be avoided, compensation liability will arise according to expert evaluation.

Efforts will be made to ensure the local communities have access to their agricultural lands, forests, and grazing lands based on their requests. Investigating technical and viable solutions will be key in maintaining access to forests and farmlands, ensuring routes are established or restored. Similarly, strategies will be devised to guarantee access to grazing lands and areas for animal grazing, with appropriate pathways reinstated for both human and animal use.

Access roads to the agricultural lands, forests and pastures will be provided according to demands of local communities. Technical and feasible measures will be explored to provide access to pastures, forests and agricultural lands, and proper passages will be provided to restore access.

6.2.1.2 Vulnerability assistance

When the members of independent vulnerable groups such as women heads of households, elderly PAPs, people with disabilities etc. want to reach a service related to the Project directly or indirectly but have difficulty reaching it due to their vulnerability, they can request assistance such as meeting with the bank or notary employee, signing a document, reaching an information provider, transportation, access to professional, lawyer, estate agent etc. from the local units of the Project (For details see Section7.0).

6.2.1.3 Mitigation measures and other E&S Plans

Mitigation measures are the recommendations presented in the ESIA report regarding all the social and environmental impacts of the project. Mitigation measures also serve to reduce the adverse impacts of the project on livelihoods by reducing the impacts of the project on soil, water resources, flora and fauna, population, etc. This indirectly reduces the negative impact on livelihoods. The compensation strategies in this LRP will be effective provided that mitigation measures are implemented. For example, effective application of SEP and GM increases the effectiveness of the LRP (For details see Section 8.0).

6.2.1.4 Same or better conditions

In the implementation phase of the LRP, in cases where the entitlements in this LRP are insufficient, it is accepted as the basic principle that the people do not come to a worse socio-economic condition than their current situation due to the Project activities. They should maintain their current conditions or improve them.

6.2.1.5 Protection against inflation

In recent years, there has been a high inflation problem in Türkiye. Compensation and livelihood support payments to be made from the LRP fund will be updated according to the Consumer Price Index (CPI) with the Monetary Values Update Tool of the Turkish Statistical Institute (TurkStat) and paid to the PAPs by environmental and social project management units of DOĞUŞ-EZE JV. LRP payments will be made in parallel with expropriation payments, or at least with minimal time gap (for example, no longer than 3 months apart). If not, top-up payments will be updated quarterly until payment is made. If the current price is not paid within three months, the price will be updated again.

6.2.1.6 Addendums to LRP

If an undefined impact is encountered, LRP commitments will be followed, and support strategies will be developed.

- PAPs who are included due to revisions will be entitled to compensation and supports within the framework of the principles in this report.

- Addendum to the LRP will be prepared to identify people affected by additional project components or changes in the design and identified PAPs will be entitled to compensation and measures in compliance with this LRP.
- If necessary, additional work is carried out for revisions. New rights holders could be identified during monitoring and evaluation activities and measures will be developed within the framework of LRP principles.

DOĞUŞ-EZE JV will prepare Addendum to the LRP for Project components that are not covered by this report in case of revisions (design changes). PAHs/PAPs detected in the addendums are also eligible for entitlements in this LRP.

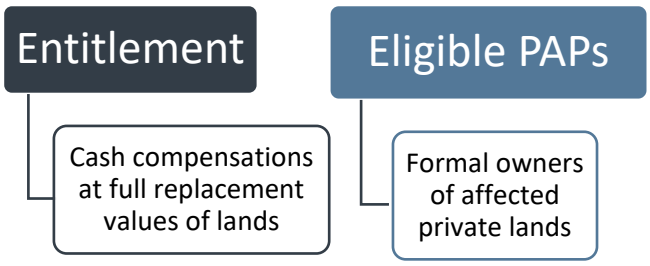
Any insufficient measure to minimize the impacts or restore livelihoods that are identified during internal and/or external monitoring will be further followed for improvement in due course as necessary. In addition, any request will be addressed through the GM.

6.2.2 Entitlements of LRP

6.2.2.1 Cash compensations at full replacement values of lands

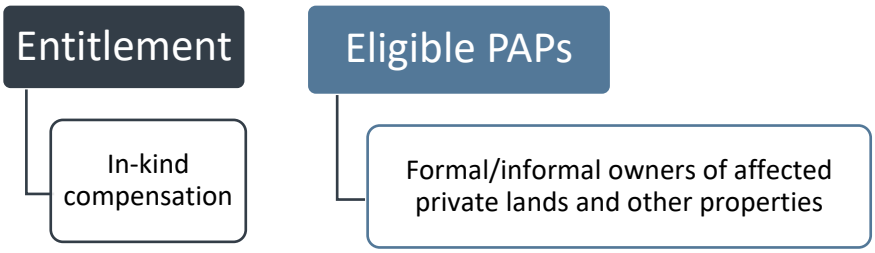
According to Article 3 of the CMB Communiqué on Valuation Standards in the Capital Markets (III-62.1), which came into force by being published in the Official Gazette dated 01.02.2017 and numbered 29966, "In the valuation activities carried out, the Valuation Experts Association of Türkiye and the Capital Markets Association of Türkiye" It is mandatory to comply with the published International Valuation Standards. For this reason, during the expropriation of lands, valuation is carried out in accordance with PS5. However, there are still gaps between national legislation and international standards during the expropriation of structures/buildings.

According to national legislation, structures that have depreciated from the moment of their construction will be compensated by deducting depreciation. However, to meet replacement value as required by PS5, the cost of depreciation and demolition must not be deducted from the valuation. For structures (there are no affected buildings) acquired through expropriation, additional compensation (top-up payment) for depreciation is provided to owners to reach full replacement value. (See Entitlement Matrix below).



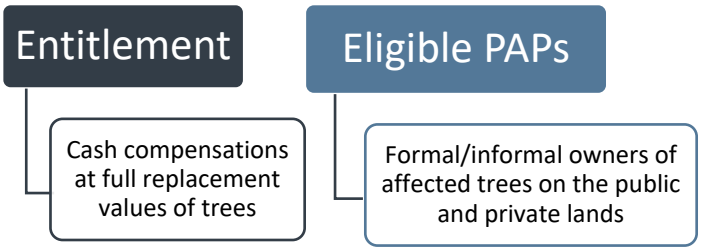
6.2.2.2 In-kind compensation

PS5 states that the Borrower (AYGM) will offer the choice of replacement property of equal or higher value, with security of tenure, equivalent or better characteristics, and advantages of location. Compensation in kind should be considered in lieu of cash. Project will offer the choice of replacement property of equal or higher value, with security of tenure, equivalent or better characteristics, and advantages of location, if demanded. (See Entitlement Matrix below).



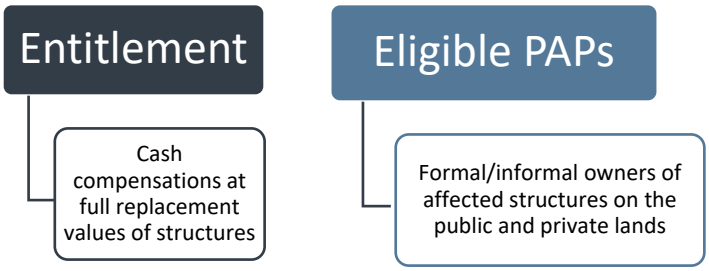
6.2.2.3 Cash compensations at full replacement values of trees

Compensation of trees are paid in accordance with national Land Expropriation Law in cash to property owners. This payment could be not a full replacement cost as it deducts certain items (cutting costs, etc.). However, outstanding full replacement payments will be provided from the LRP Fund. Cash compensation for affected trees at full replacement value will be provided. The amount payable will be the deduction amounts specified in the valuation reports to be prepared after asset inventory studies. (See Entitlement Matrix below).



6.2.2.4 Cash compensations at full replacement values of structures

There are secondary structures on affected lands and affected by land acquisition such as water well, irrigation system, wire fence. The cost of these structures is paid by adding to the expropriation price. However, outstanding full replacement payments will be provided from the LRP Fund. Cash compensation for affected fixed assets at full replacement value will be provided. It is expected that additional payment amount collected will be made from LRP Fund for compensation at replacement cost. The amount payable will be the deduction amounts specified in the valuation reports. (See Entitlement Matrix below).

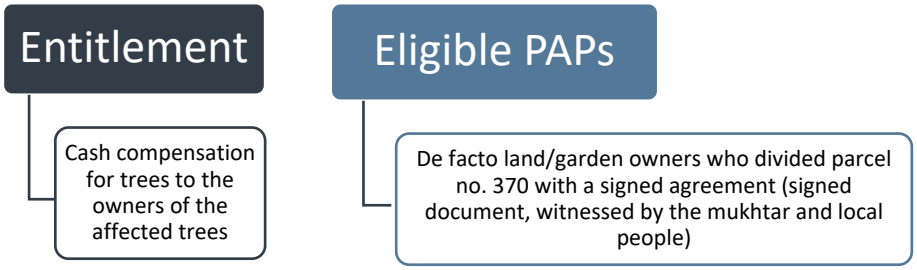


6.2.2.5 Cash compensation for the olive trees of de facto owners of the lands/olive gardens

Over the years, villagers/relatives have used olive gardens in Hatay Province, Kırıkhan District, Bektaşlı Settlement Parcel no: 370 by dividing it with signed agreements and in practice ('amicable partition'), but this division process has not been reflected in the official land registry records. The majority of shareholders are people who have no relation to the land, live in other provinces and have not continued agricultural activities, and their children/grandchildren. There are olive gardens on these parcels. There is a risk that de facto owners

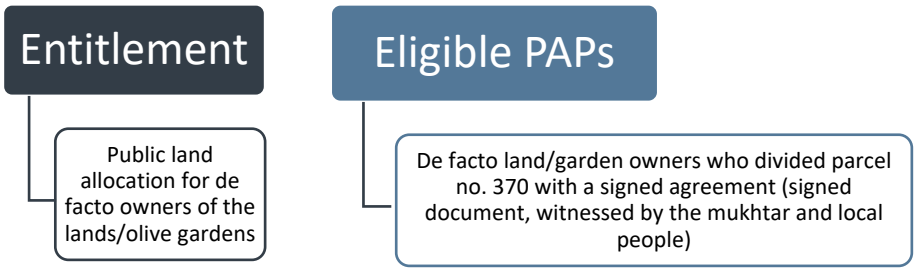
will not receive appropriate compensation during expropriation of land due to ownership issues in the land registry records. The expropriations necessary for the Project's land requirements have not yet begun. Prior to this process, with the support of Project Management, efforts have been initiated to correct errors in land records, and the work done to ensure full compensation for land acquisition, along with stakeholder consultations conducted in the early stages of the Project, are important steps in addressing the gaps between national expropriation laws and IFC PS5 requirements.

According to national legislation, expropriation compensation for trees is given to the tree owner, not the landowner. Therefore, the owner of the trees is determined in Appendix A. Tree compensation will be paid to these persons. According to national legislation, if tree compensation is not paid to tree owners, tree compensation will be paid from the LRP fund.[5] (See Entitlement Matrix below).



6.2.2.6 *Public land allocation for de facto owners of the affected olive gardens on parcel no. 370*

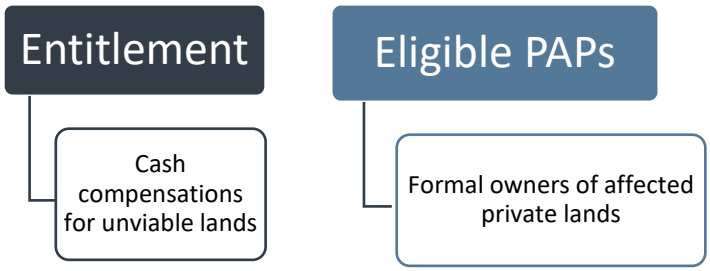
When the expropriation process is completed, some de facto owners will lose the land they use and will not receive sufficient compensation. Supports have been defined within the scope of the LRP for these people to prepare a new olive garden (land preparation support). During land preparations, additional labor support will be provided to elderly producers. However, in order to prepare the land, they need new lands. Therefore, de facto owners will be given public lands, with the condition of making new olive groves and without the requirement of rent. (See Entitlement Matrix below).



6.2.2.7 *Cash compensation for unviable lands*

If the remaining part of the land is “unviable” after partial permanent expropriation, the remaining parts may be expropriated under law by AYGM as per the “unviable lands acquisition criteria”. However, AYGM proactively includes unviable lands (small and/or misshapen) in the expropriation amount from the very beginning.

[5] Since the asset inventory study has not yet been completed, the number of trees in parcel 370 is not yet known. Approximately 20-30 olive trees can be planted per decare. 268 decares of parcel 370 will be used for the project. In this case, there is a possibility of approximately 6700 olive trees in the 268 decare olive gardens. It was learned during the LRP field study that the average age of the trees is 25. According to the market research, it is estimated that the average replacement cost of the trees is approximately 8000 TRY. In this case, if compensation cannot be provided during the national expropriation process, the approximate compensation amount to be paid for the trees from the LRP fund for the de facto owners can be expected to be 53,600,000 TRY. However, the exact prices will be determined after the asset inventory and land valuation processes are completed.



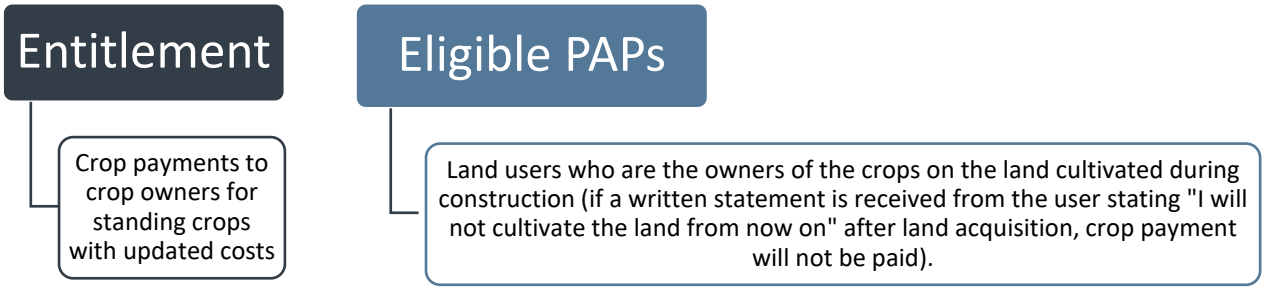
If unviable land is not expropriated, it is added to the affected land size and accordingly the impact on the total land assets/holdings is reassessed. If this impact is more than 20%, the PAP is considered to be in the "significantly affected group" (See Entitlement Matrix above).

6.2.2.8 Crop payments to crop owners for standing crops with updated costs

The construction calendar will be shared with the mukhtars of the PASs by AYGM, so that the farmers can harvest their crops. If there is standing crop on expropriated lands just before the construction activities and the construction cannot wait for certain reasons, the cost of the crops will be paid to the user by the Project. After the land acquisition is completed and the land has not yet been cultivated, if the JV receives a signed letter from the users stating that "I will not cultivate the land from now on", then the crop payment obligation may be eliminated.

If harvest is not possible due to the urgency of construction activities and there is no signed letter, cash compensation at market value of annual crops to crop owner determined by Ministry of Agriculture and Forestry will be paid by JV. Instead of using the previous year's unit prices, the crop compensation rates will be **updated** in line with the inflation rate. TurkStat's "Monetary Values Update Tool" is used for updating. The update is made according to the Consumer Price Index (CPI).

It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners. The crop payment is paid to the **crop owner**, not the landowner if they are different. Crop payments will be deposited to tenants, informal users of communal lands, land holders/occupants without legal or customary title from LRP Fund. Informal users can reach JV through GM for compensation for the products damaged due to the construction activities of the Project. (See Entitlement Matrix below).

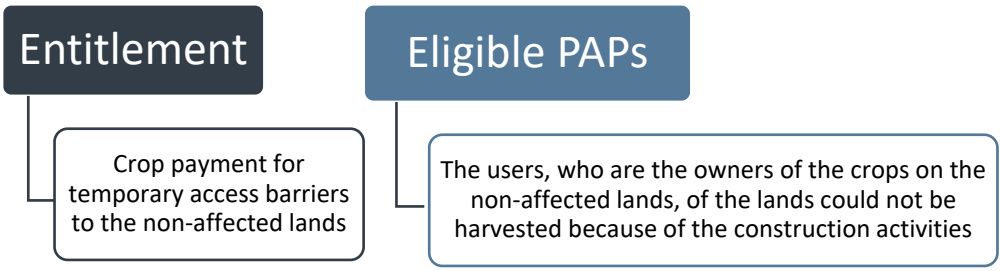


6.2.2.9 Crop payment for temporary access barriers to the non-affected lands

Access to agricultural lands will be provided. Temporary access barriers due to construction work may cause some lands to become unviable hence crops not to be raised and/or harvested. In such cases, compensation is provided to crop owners.

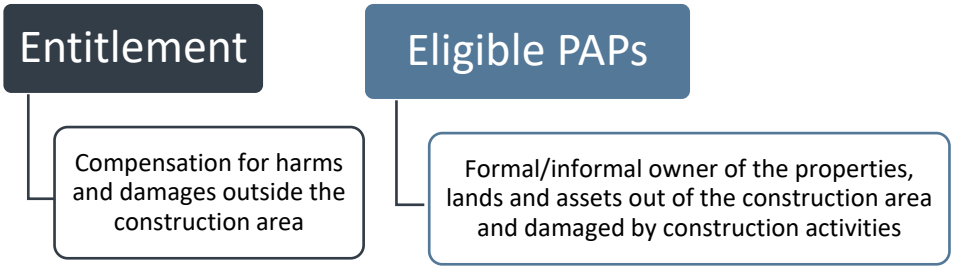
If the land outside the construction area becomes unviable for agricultural activity throughout the construction period, the claim (of actual land user) received via GM for payment for standing crops on unviable lands will be

evaluated by AYGM. The crop payment of the part of the land that cannot be harvested due to construction works is covered by the LRP fund. (See Entitlement Matrix below).



6.2.2.10 Compensation for harms and damages outside the construction area

Damages caused by construction activities to products and assets outside the construction area are compensated by sub-contractor firms. DOĞUŞ-EZE JV's subcontractor agreements will include compensation for harms and damages commitment and liability for each and every project standard that DOĞUŞ-EZE JV is committed to. (See Entitlement Matrix below).



Dust impact will also be evaluated within the scope of harms and damages and yield loss claims received through the grievance mechanism will be evaluated. In order to avoid this impact, construction activities will not be carried out during the **flowering season** and **irrigation** will be carried out by DOĞUŞ-EZE JV. If these mitigation measures are not taken, yield losses received through the complaint mechanism will be evaluated within the scope of harms and damages and the crop payment will be paid. The crop payment will be calculated based on the prices received from the Provincial Directorates of Agriculture and Forestry.

6.2.2.11 Transitional Livelihood Support (TLS)

TLS is provided to support the livelihoods of households during the transition period. TLS payments equals' monthly net minimum wage will be made from LRP Fund for vulnerable PAPs.

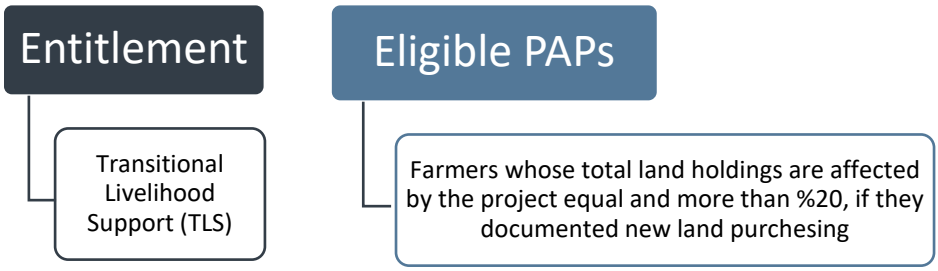
Considering that the provinces are in the middle and lower-middle socio-economic level and 45% of Turkish salary-earners is on minimum wage, it shows that it is appropriate to take the minimum wage as a reference in the calculation of the transitional livelihood support. In Türkiye, there are two wages that can be taken as reference to ensure minimum living conditions. These are;

- Minimum wage
- Unemployment wage

The first one is 17,002.12 TRY (July 2022), while the second one is changeable. The highest unemployment benefit and the minimum wage are almost the same. As it is widely used in RAP/LRPs based on international standards prepared in Turkiye, the minimum wage, which is increased by the government every year according to the inflation rate, will be taken as reference in the transition period support of different amounts.

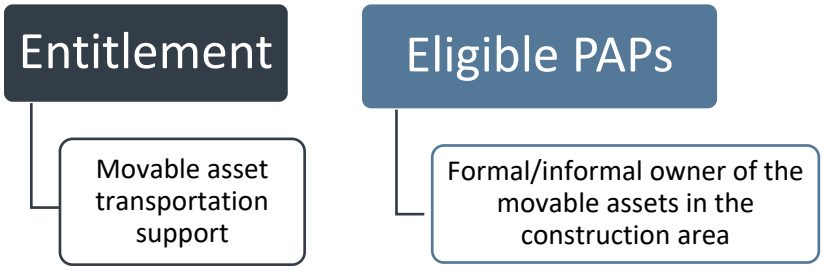
AYGM uses the minimum wage as a reference in TLS payments based in other investment projects.

Farmers who lost 20% or more of their total land holdings due to the project will need to carry out some preparatory activities on the new lands while replacing their lands. There is a risk of income loss during the preparation of the new lands. Therefore, a two-month transitional livelihood support will be provided to support farmers during the preparation work, which is expected to last approximately two months, if they can prove that they received new land with compensation. (See Entitlement Matrix below).



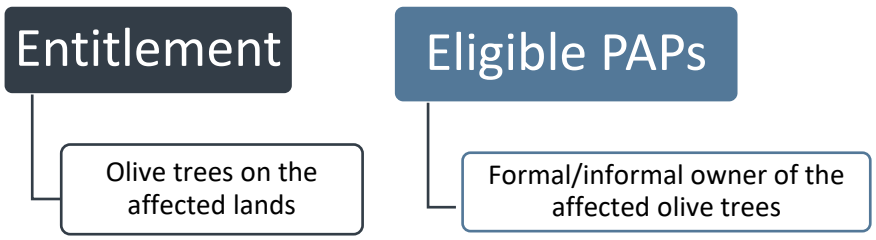
6.2.2.12 Movable asset transportation support

Support (in-kind) will be provided for the transfer of portable assets such as solar energy panels and base stations to another land. At the request of the owners, the movable assets in the affected land can be moved by DOĞUŞ-EZE JV to another land in the same city. (See Entitlement Matrix below).



6.2.2.13 Relocation of olive trees to another land

Among the trees affected by the land acquisition of the project are valuable olive trees. These trees can be moved to other lands of the owners of the trees. However, PAPs consider this transfer process to be inefficient. Therefore, the relocation process can only be done upon the request of PAP after full replacement cost compensation is paid for the trees. (See Entitlement Matrix below).

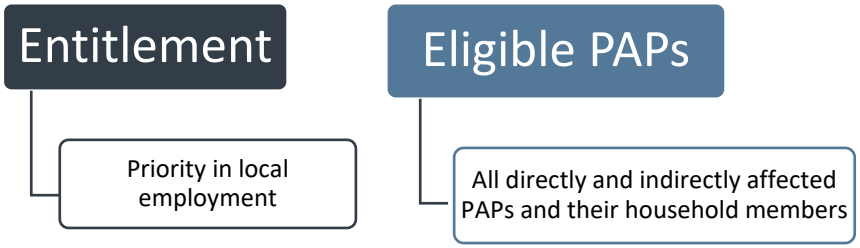


6.2.2.14 Priority in local employment

Local employment is a mitigation measure offered under the ESIA. In addition, priority will be given to the employment of dependent vulnerable household members directly affected by the project's land acquisition

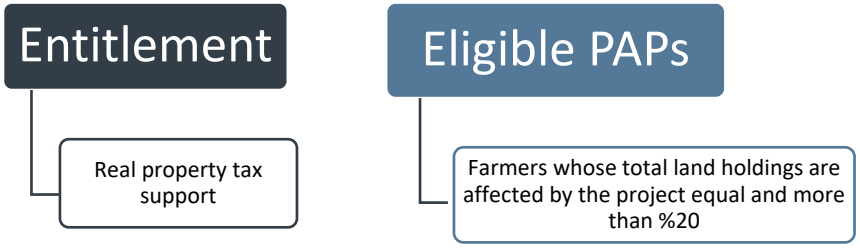
under the LRP. In the job application forms, “Were your house and lands directly affected by the land acquisition of the project?” question will appear. For the provision of temporary or permanent employment opportunities, prioritization of local employment and economically displaced persons will be stipulated in contracts to be made with the subcontractors and DOĞUŞ-EZE JV will ensure that these people have been provided with employment opportunities in the Project.

DOĞUŞ-EZE JV will take care to employ local people during the construction works. Particular attention will be paid to the employment of directly-PAPs whose lands are affected by land acquisition of Project, including dependent vulnerable PAPs. During M&E activities, local employment numbers will be reported as direct-PAPs and indirect-PAPs (local communities). (See Entitlement Matrix below).



6.2.2.15 Real property tax support

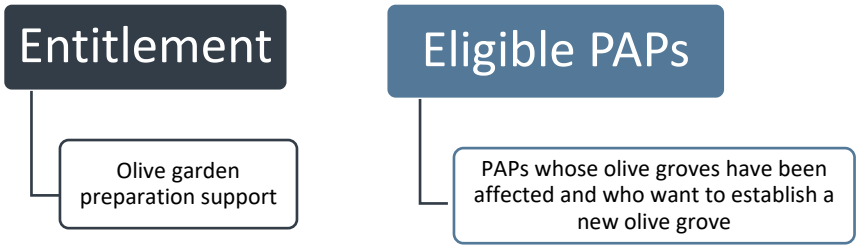
If farmers whose total land holdings are affected by the Project more than 20% want to buy new lands, the real property tax (%2) of the new land will be paid form LRP fund of the project. A PAP can receive tax support up to ten times the size of the land affected by the project, regardless of the size of the land to be purchased. (See Entitlement Matrix below).



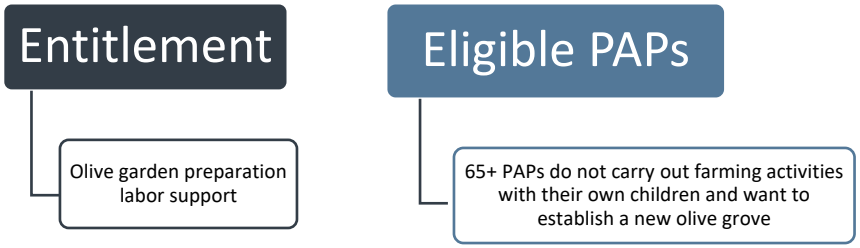
6.2.2.16 Olive garden preparation support

The project has an impact on olive cultivation activities, which have high added value. It is intended to support PAPs whose olive groves are affected by the project to establish a new olive grove with the compensation they collect. Therefore, land preparation support will be provided from the project's LRP fund for those whose olive groves have been affected and who want to establish a new olive grove.

Fertilizer and diesel support will be provided to PAHs. In traditional olive cultivation, there are approximately 20-30 trees/decare in one decare of land. Approximately 25 olive tree saplings per decare. One sapling is estimated as 80 TRY according to the market search. The amount of land affected by the project (decare) * 25 * 40 TRY (50% of the olive tree price) will be supported. This is 1000 TRY per decare affected. (See Entitlement Matrix below).



Some olive producers affected by the project may be over 65 years of age. If these PAPs do not carry out farming activities with their own children, they may need additional labor support. The labor support amount for olive producers over 65 is calculated as 5000 TL per decare.



6.3 Entitlement Matrix

According to the data obtained from the LRP preparation studies, there are different types of rights holders who are affected by land acquisition in different ways. The entitlement matrix (EM) offers compensation measures in the light of the above-mentioned strategic instruments in Table 20.

Table 20 Entitlement Matrix (EM) of LRP

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
1	**Owners and residents affected by the land acquisition of the project**	There is no affected houses.	Physical resettlement	▪ If the affected houses are identified during the asset inventory study, a Resettlement Action Plan (RAP) will be prepared independent of this LRP.	DOĞUŞ-EZE JV will prepare a RAP on the behalf of AYGM, if needed. AYGM will take a role in informing the public about the entitlements and the Project will prepare GLAC and distribute it to all settlements by JV.
2	**Residents in Isdemir's container area**	There is a container area used by earthquake-affected workers on the lands used by Isdemir near to expropriation area.	Relocation	▪ The container area is near to the land acquisition area of the project. The impact on the container area will be avoided. If can not avoid, the are will be moved by İsdemir. ▪ Access to container areas will be provided.	DOĞUŞ-EZE JV will avoid the impact on the container area. Technical and feasible measures will be explored to provide access to container areas, and proper passages will be provided to restore access during construction by DOĞUŞ-EZE JV. AYGM will take a role in informing the public about the entitlements and the Project will prepare GLAC and distribute it to all settlements by DOĞUŞ-EZE JV.
3	**Owners of the affected lands**	751 owners/ shareholders of 55 private lands	Loss of private lands	▪ Cash compensation at full replacement cost is paid to the right owners.	Compensation for lands will be paid from Expropriation Budget of AYGM. AYGM will take a role in informing the public about the entitlements and the Project will prepare GLAC and distribute it to all settlements by DOĞUŞ-EZE JV.

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
4	**Formal and informal users** (owner of the crops) **of the private and public lands**	52 arable lands and gardens	Loss of crops	▪ Crop owner allowed to harvest their standing crops prior to Contractor's entry into the needed land. ▪ Cash compensation at market value of annual crops to crop owner determined by Ministry of Agriculture and Forestry. ▪ It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners. ▪ Access will be provided. Temporary access barriers due to construction work may cause crops not to be harvested. In such cases, compensation is provided to crop owners.	The construction calendar will be shared with the mukhtars of the PASs by AYGM and DOĞUŞ-EZE JV, so that the farmers can harvest their crops. If there is standing crop on expropriated lands just before the construction activities, the cost of the crops will be paid to the crop owner. National requirement is limited to census of immovable assets and legal titleholders. Tenants, users of communal land, land holders/occupants without legal or customary title have not been identified. It is AYGM's responsibility to bring Census data in line with national standards to international standards. AYGM will identify the users, tenants and informal users of the affected parcels in the PASs under construction responsibility of AYGM. In the scope of LRP preparation studies most of users already identified (See Appendix A). Access to agricultural lands will be provided. Temporary access barriers due to construction work may cause some lands to become unviable hence crops not to be raised and/or harvested. In such cases, compensation is provided to crop owners.
5	**Formal/ informal owners of olive gardens**	Trees on app. 40 lands	Losses of trees	▪ Compensation of gardens and trees and other fixed assets are paid in accordance with national Land Expropriation Law in cash to property owners. ▪ Outstanding full replacement payments will be provided from the LRP Fund. Cash	Compensation for lands will be paid from Expropriation Budget of AYGM. If the payments made by the administration for trees are not a full replacement cost as it deducts certain items (cutting costs, etc.). It is expected that additional payment amount collected will be made from LRP Fund to make compensation at

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
				compensation for affected trees at full replacement value will be provided. ■ Land preparation support will be provided from the project's LRP fund for those whose olive groves have been affected and who want to establish a new olive grove. If there are de facto owners who cannot be compensated under national legislation, they will be given public lands. with the condition of making olive groves and without the requirement of rent. ■ Compensation for trees of de facto owners at full replacement value Relocation of olive trees to another land.	replacement cost for trees. The amount payable will be the deduction amounts specified in the valuation reports. Fertilizer and diesel support will be provided to PAHs. In traditional olive cultivation, there are approximately 20-30 trees/decare in one decare of land. Approximately 25 olive tree saplings per decare. One sapling is estimated 80 TRY, according to the market search. The amount of land affected by the project (decare) * 25 * 40 TRY (50% of the olive tree price) will be supported. This is 1000 TRY per decare affected. De facto owners of the lands divided by signed agreements in Bektaşlı Parcel no: 370, identified during LRP preparation studies (See Appendix A). Those who have not yet been identified will be identified by the DOĞUŞ-EZE JV (for the unidentified areas see Chapter 5). These persons will be eligible with the signed agreement, local people and mukhtar witnesses for public land allocation and cash compensation for affected trees. According to national legislation, expropriation compensation for trees is given to the tree owner, not the landowner. Therefore, the owner of the trees is determined in Appendix A. Tree compensation will be paid to these persons. According to national legislation, if tree compensation is not paid to tree owners, tree compensation will be paid from the LRP fund.

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
					PAPs consider the transfer process of olive trees to another land to be inefficient. Therefore, the relocation process can only be done upon the request of PAP after full replacement cost compensation is paid for the trees. DOĞUŞ-EZE JV is responsible for providing entitlements of formal and informal PAHs and PIU will play a role in facilitating PAPs access to their entitlements.
6	Formal/informal owners/users of the **fixed assets** on the affected lands	Assets on 46 lands including irrigation systems	Losses of fixed assets	■ Compensation of fixed assets are paid in accordance with national Land Expropriation Law in cash to property owners. ■ Outstanding full replacement payments will be provided from the LRP Fund. Cash compensation for affected fixed assets at full replacement value will be provided. ■ Households have the right to use all of the recovered materials. ■ Support will be provided for the transfer of portable assets such as solar energy panels and base stations to another land. ■ Deteriorated irrigation systems will be fixed, or construction will be assisted.	Compensation for lands in which expropriation process has begun will be paid from Expropriation Budget of AYGM. However, full replacement cost that the legal legislation does not cover will be provided from LRP Fund. It is expected that additional payment amount collected will be made from LRP Fund to compensation at replacement cost for fixed assets. Irrigation systems will be compensated and displacement operations will be carried out by the Contractor. At the request of the owners, the movable assets in the affected land can be moved by DOĞUŞ-EZE JV to another land in the same city. DOĞUŞ-EZE JV will ensure that the GM is always open for those seeking access to their entitlements in this LRP during construction.

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
					DOĞUŞ-EZE JV is responsible for providing entitlements of formal and informal PAHs and PIU will play a role in facilitating PAPs access to their entitlements.
7	**Beneficiaries of the affected common properties / ecosystem services** (pasture forest, river)	App. 10 households	Loss of common property areas and access	▪ Access to pastures will be provided to the pasturelands/grazing areas.	Technical and feasible measures will be explored to provide access to pasture areas, and proper passages will be provided to restore access after construction by DOĞUŞ-EZE JV.
8	**Farmers whose total land holdings affected by the Project more than 20%**	There are 31 agricultural lands under the impact 20% and more. Five farmers identified with %20 impact on total land holdings.	Significant impact on land-based livelihood sources	▪ TLS ▪ Real property tax support	TLS is provided to support the livelihoods of households during the transition period. TLS payments equals' monthly net minimum wage will be made from LRP Fund for vulnerable PAPs. Farmers who lost 20% or more of their total land holdings due to the project will need to carry out some preparatory activities on the new lands while replacing their lands. There is a risk of income loss during the preparation of the new lands. Therefore, a two-month transitional livelihood support will be provided to support farmers during the preparation work, which is expected

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
					to last approximately two months, if they can prove that they received new land with compensation. If farmers whose total land holdings are affected by the Project more than 20% want to buy new lands, the real property tax (%2) of the new land will be paid form LRP fund of the project. A PAP can receive tax support up to ten times the size of the land affected by the project, regardless of the size of the land to be purchased. DOĞUŞ-EZE JV is responsible for providing entitlements of formal and informal PAHs and PIU will play a role in facilitating PAPs access to their entitlements.
9	**Users of unviable lands**	NA	Indirectly loss of land	▪ If the remaining part of the land is “unviable” after partial permanent expropriation, the remaining parts may be expropriated under law as per unviable land acquisition criteria.[6]	AYGM proactively includes unviable lands (small and/or misshapen) in the expropriation amount from the beginning. If unviable land is not expropriated, it is added to the affected land size and accordingly the impact on the total land assets/holdings is reassessed. If this impact is more than 20%, the PAP is considered to be in the "significantly affected group"

[6] If the remaining part of the expropriated property is not suitable for cultivation/benefit, expropriation of the remaining property must be made within thirty days after the submission of a written notice without the need to file a lawsuit in the administrative court (Expropriation Law Article 12, pr.7).

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
					AYGM will take a role in informing the public about the entitlements and the Project will prepare GLAC and distribute it to all settlements by DOĞUŞ-EZE JV.
10	**Elderly olive producers**	NA	Difficulty in preparing a new olive grove	■ Land preparation support will be provided from the project's LRP fund for those whose olive groves have been affected and who want to establish a new olive grove. Some olive producers affected by the project may be over 65 years of age. If these PAPs do not carry out farming activities with their own children, they may need additional labor support.	Fertilizer and diesel support will be provided to PAHs as explained in the 5th line of this EM. The labor support amount for olive producers over 65 is calculated as 5000 TL per decare.
11	**PAPs whose assets outside the expropriation corridor are damaged by construction**	NA	Harms and damages	■ Compensation for harms and damages: Damages caused by construction activities to products and assets outside the construction area are compensated by sub-contractor firms. ■ Irrigation and crop payment for yield decrease of olive trees.	DOĞUŞ-EZE JV's subcontractor agreements will include compensation for harms and damages commitment and liability. For the claims of PAPs that the yield has decreased due to dust originating from the Project, institutional cooperation will be established for the measurement and evaluation of olive yield by provincial or district agricultural experts. Yield loss claims received through the grievance mechanism will be evaluated. In order to avoid this impact, construction activities will not be carried out during the flowering season and irrigation will be carried out by DOĞUŞ-EZE JV. If these mitigation measures are not taken, yield losses received through the complaint mechanism will be evaluated within the scope of harms and damages and the crop payment will be

No	PAP Category	LRP findings	Type of losses	Entitlements	Responsibilities
					paid. The crop payment will be calculated based on the prices received from the Provincial Directorates of Agriculture and Forestry.
12	**Affected settlements** (PASs)	4 PASs	Impacts on access roads and services commonly use	■ The current infrastructure and services will be protected and regulated so as not to bring economic losses to its users. ■ Technical and feasible measures will be explored to provide access to lands, and proper passages will be provided to restore access after construction.	Infrastructure and roads damaged in past construction activities will be repaired by DOĞUŞ-EZE JV with instruction of AYGM. DOĞUŞ-EZE JV will ensure that the GM is always open for those seeking access to their entitlements in this LRP during construction.
13	**Vulnerable PAPs**	32 vulnerabilities in the PAHs	Disadvantaged positions against the project	■ Vulnerability assistance will be provided, including various types of service support ■ It is very important for Vulnerable PAPs to reach stakeholder engagement channels. Therefore, additional measures will be taken. ■ Local employment opportunities will be provided for unemployed and poor peasants. ■ Equality in the number of men and women will be paid regard in benefiting from LRP. ■ It is very important for Women to reach stakeholder engagement channels.	Vulnerability Assistance will be provided by local office of PIU. Details are presented in Chapter 7. DOĞUŞ-EZE JV is responsible for providing entitlements of vulnerable PAPs and PIU will play a role in facilitating PAPs access to their entitlements. CLT will organize activities for vulnerable groups and women have access to stakeholder engagement opportunities.

7.0 VULNERABILITY ASSESSMENT

7.1 Vulnerable Groups

Vulnerabilities are related to individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. What distinguishes them from other people affected by the Project land acquisition is that they need to be supported when involved in expropriation processes, as they need the support of others in other daily duties/routines because of physical (disability), social (gender) or economic (poverty, landless) disadvantages. Because of these disadvantages, they may be expected to experience difficulties at some stages of land acquisition and construction (such as stakeholder engagement, access to payments, livelihood activities or access to grievance mechanism).

Vulnerable individuals living in settlements affected by the project constitute the indirect vulnerable group, while disadvantaged PAPs (members of households affected by the project's land acquisition) directly affected by land acquisition constitute the directly affected vulnerable group. While indirect vulnerable groups are evaluated in ESIA, only direct-PAPs are addressed in this LRP. These groups are:

- Female head of household
- Elderly in need of care and social assistance
- Disabled (Physical / Mental)
- Homebound due to Chronic Disease
- Illiterate adult
- Refugee/migrant
- Earthquake victim (loss of house)

Due to some disadvantages in the land acquisition and construction process, there may be various problems that vulnerable people may encounter difficulty in access to payment etc. For independently vulnerable PAPs, difficulty in access to;

- stakeholder engagement activities undertaken throughout the land acquisition and construction process by virtue of some disadvantages,
- grievance mechanism despite being subject to economic displacement or suffering damage or loss due to project activities,
- service to restore their order of life and livelihood,
- compensation or crop payment for their crops and assets acquired for the Project by virtue of some disadvantages in the process of the land acquisition,
- their livelihood activities in private lands, public lands and common properties (pasture and forest),
- infrastructure and social services,
- livelihood restoration activities.

7.2 Identified Vulnerable PAPs

Within the scope of the LRP field study, vulnerabilities of all affected household members were examined, and 32 vulnerabilities were identified. Some of these are mixed vulnerabilities (multiple vulnerabilities in one person) and the list of vulnerable PAPs presented in Appendix C.

Table 21: Identified vulnerable PAPs

Vulnerable group	Number of household members
Female head of household	2
Elderly in need of care and social assistance	0
Disabled (Physical / Mental)	6
Homebound due to Chronic Disease	4
Illiterate adult	8
Refugee/migrant	0
Earthquake victim (loss of house)	12
Total vulnerabilities	**32**

Source: LRP preparation field study, 2024

7.3 Vulnerability Assistances

The types of assistance for each vulnerable group are presented in Table 22 below, but the assistance to be provided may not be limited to these. The requests of PAPs are always evaluated by the PIU and can be achieved by evaluating the relation to vulnerability and the project.

Table 22: Vulnerability assistances per vulnerable groups

Vulnerability category	Vulnerability Assistance
Female head of household	Safe stakeholder engagement opportunities will be provided for women. Women CLOs will hold one-on-one meetings with these groups and provide information about the entire project, including land acquisition, community health and safety, and gender aspect. Requests for assistance will be considered to achieve compensation or various supports.
Elderly in need of care and social assistance	It is known that these groups have difficulties in accessing information, compensations, and other supports. Therefore, when they want to reach a service related to the Project directly or indirectly but has difficulty reach it due to their vulnerability; they can request assistance from the local units of the Project. These Vulnerability Assistances include, but are not limited to: ■ Reaching the bank ■ Meeting with the bank ■ Bank employee home visit ■ Reaching the notary ■ Getting information from the notary ■ Notary employee home visit ■ Sending and receiving documents (cargo, fax, e-mail, etc.)
Disabled (Physical / Mental)	
Homebound due to Chronic Disease	
Earthquake victim (loss of house)	

Vulnerability category	Vulnerability Assistance
	■ Signing any document at home ■ Transportation ■ Access to information and consultancy ■ Professional, lawyer, estate agent etc. providing ■ Utilization in public services ■ Engagement opportunities at home Vulnerable PAPs identified in the Census study will be provided with specific information about their entitlements from LRP. Additional supports for vulnerable individuals (groups in the left column) whose home or surroundings, stables or livelihood resources are affected by the project may include: ■ Renovation, gardener, architect, etc. support. ■ Support if health needs arise during the move. ■ Providing facilities to facilitate their daily life if their roads are disrupted. ■ Providing all services that serve to restore or even facilitate daily life. ■ Participation in expenses for poor households. Requests are received by CLOs at site visits or through the GM and evaluated by the PIU in terms of tie of project and vulnerability.
Illiterate adult Earthquake victim (loss of house)	Oral, face-to-face and visual engagement opportunities and translator support will be provided. Consultancy will be provided in line with their demands in accessing social services.

8.0 STAKEHOLDER ENGAGEMENT

8.1 Consultation and Disclosure of Information

According to IFC Performance Standards and Equator Principles, disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the Project. The first draft of this LRP will be disclosed and is open to stakeholder feedback. It will be finalized by updating with the feedbacks of the stakeholders. All stakeholders are invited reading this report to provide feedback on:

- Correspondence address: Central office of DOĞUŞ-EZE JV (Mustafa Kemal Mah. Dumlupınar Blv. No: 266 / A Blok 19-20 Tepe Prime Çankaya / ANKARA)
- Project website: https://www.dortyolhassa.com.tr/
- E-mail: info@dortyolhassa.com.tr
- Phone: 0536 907 88 04

Public disclosure is one of the main steps of stakeholder engagement. Verbal, written and visual sources could be used as the informing tools. The most important verbal sources are meetings, which will be organized the district centres before expropriation started. Brochures, leaflets, posters and advertisement are both written and visual tools to inform. Besides, the official website could contain different information sources.

Meetings to be held in district centres will be organized by AYGM and DOĞUŞ-EZE JV. Feedback received at the meeting and during the next 15-day suspension will be recorded by DOĞUŞ-EZE JV. According to the feedback, the LRP takes its final form.

8.2 Grievance Mechanism

A Project-specific community Grievance Mechanism (GM) will be developed and implemented. The GM will be part of the management system. It will respond to any concerns and complaints, especially from affected stakeholders and communities. Special attention will be given to the training of the designated staff involved in the management of the grievance mechanism. The overall objective of the grievance mechanism is to provide an opportunity for all stakeholders to obtain information about AYGM and DOĞUŞ-EZE JV's activities and facilities, to submit their complaints and concerns in a structured and formal manner, and to receive prompt, fair and effective responses.

Comments or concerns may be made to the DOĞUŞ-EZE JV verbally, in writing (by post or email) or by completing a Grievance Form. The form will be made available on the Project website, at the Project site and at the Mukhtar's office, along with a description of the mechanism. All grievances will be:

- acknowledged within seven days of receipt; and
- responded to no later than 30 days after receipt.

According to SEP, in particular, nominated and trained staff will record information about complaints in complaints register. The information in the complaints register will include details of the complaint and how and when it was submitted, acknowledged, responded to and closed. The process is illustrated in Figure 13 below.

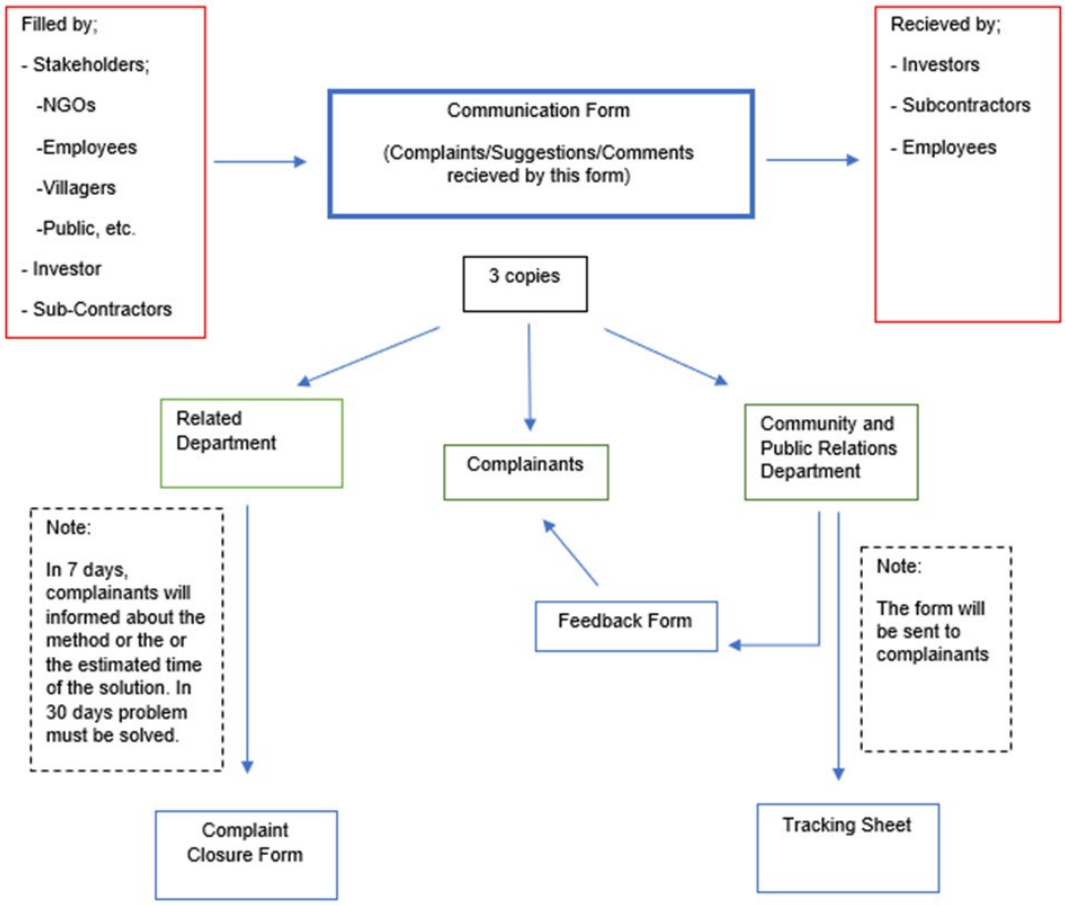


Figure 13: Grievance Handling Process

Individuals may request that their names remain confidential, and this mechanism does not preclude the right of stakeholders to pursue grievances through other legal means.

- Step 1: Receipt of complaint,
- Step 2: Assessment,
- Step 3: Acknowledgement of complaint,
- Step 4: Investigation and resolution of the complaint,
- Step 5: Closure, and
- Step 6: results of corrective action.

The grievance mechanism is widely publicized, with stakeholder meetings held for project-affected communities. Additional meetings will be organized for women PAPs and vulnerable groups to share information on the grievance mechanism, which also allows for anonymous complaints.

The CLO team appointed by DOĞUŞ-EZE JV will consist of one male and one female. The grievances will be reviewed by the team in accordance with the Project's human rights and grievance mechanism.

The public can raise any issues, complaints, and requests through the Presidential Communication Centre (CIMER). This centre is an active 24-hour online national system developed by the Directorate of

Communications to keep the channels of communication open between the public and the government. The public can raise issues, complaints, and requests at any time and from anywhere. Issues, complaints, and requests can be both received and responded to through this national online system.

The CIMER system allows stakeholders to communicate directly with AYGM during the construction phase and with TCDD and KGM during the operational phase.

8.3 Guide to Land Acquisition (GLAC)

A Guide for Land Acquisition (GLAC) will be published and disseminated by the Project to PAPs to raise right awareness.

Project Company will play a role in the dissemination of GLAC in PASs. GLAC will contain the following information:

- Expropriation process,
- Rights and responsibilities of PAPs,
- Rights from LRP with EM,
- Grievance Mechanism,
- Contact information.

9.0 MONITORING AND EVALUATION

The monitoring measures are to be implemented throughout the Project phases to assess compliance of the LRP with the Project standards. In the event that the non-conformance with the Project standards identified through monitoring, these will be investigated, and appropriate corrective actions will be identified.

Internal and external monitoring activities to be carries out during the Project and completion audit to be carried out 1 year after finalisation of compensation and livelihood restoration are planned for LRP monitoring and evaluation (M&E).

9.1 M&E Activities

9.1.1 Internal monitoring

M&E activities, which are carried out with the reporting made within the DOĞUŞ-EZE JV quarterly. These are the M&E activities that are carried out with the reports made within the DOĞUŞ-EZE JV and demonstrate the implementation of LRP requirements. Internal monitoring reports will include correction actions. These actions are the responsibility of the DOĞUŞ-EZE JV and AYGM and during each internal monitoring activity, the implementation status of the correction activities of the previous internal and external monitoring report will be reviewed.

9.1.2 External monitoring

M&E activity supported by the consultancy from an independent party biannually. It is an M&E activity that evaluates the implementation of LRP requirements, which is carried out with the consultancy support received from an independent organization. The activity must be run by an external Resettlement Expert to comply with LRP standards. External monitoring reports will include correction actions. These actions are the responsibility of the DOĞUŞ-EZE JV and AYGM and during each internal monitoring activity, the implementation status of the correction activities of the previous external monitoring report will be reviewed. The indicators to be examined within the scope of external M&E are presented in Table 23.

9.1.3 LRP completion audit

LRP completion audit is a comprehensive report that will be prepared as a document showing that the Project applications are completed in accordance with LRP commitments. Detection of practices that are incompatible with LRP and PS5 may require new application recommendations. It is the responsibility of AYGM to implement the recommendations. This M&E study is also carried out by external / independent experts. The activity must be run by an external Resettlement Expert to comply with LRP standards.

9.2 Key Performance Indicators

The LRP indicators that will reference Monitoring and Evaluation activities are listed below:

Table 23: Key Performance Indicators (KPI) for LRP

LRP indicator	Verification sources
Number of economically displaced households and individuals by project component and / or land acquisition type	Available land acquisition documents and LRP
Number of public information and consultations needed during the LRP implementation on land acquisition and restoration of livelihoods	Feedbacks of PAPs in consultation activities
Number of compensation payments at full replacement cost completed	Expropriation unit data and LRP implementation records

LRP indicator	Verification sources
Amount and percentage of payments made because of court proceedings and payments made as a result of negotiations	Expropriation unit data
Number of ongoing / open / completed court cases among total court cases	Expropriation unit data
Number and type of complaints about land acquisition, compensation process and land use problems with information on gender distribution and whether it has been resolved within 30 days in accordance with the SEP	GM
Number and % of eligible PAPs who signed compensation agreements and received necessary compensations	Expropriation unit data and LRP implementation records
Status of correction actions suggested in internal and external M&E reports	Previous internal and external M&E reports
Number of personnel allocated to resettlement	LRP implementation activities
Amount of resources allocated to resettlement	LRP implementation activities
Status of complaints (open, closed), closing time and resolution status	GM
Amount LRP Fund payments	LRP implementation activities
Number of livelihood restoration activities and types of eligible PAPs through the following sub-indicators: ■ Cash compensations at full replacement values of lands ■ In-kind compensation ■ Cash compensations at full replacement values of trees ■ Cash compensation for unviable lands ■ Crop payments to crop owners for standing crops ■ Providing access roads to the lands, forests and pastures ■ Crop payment for unviable lands ■ Crop payment for informal users ■ Compensation for harms and damages ■ Movable asset transportation support ■ Relocation of olive trees to another land ■ Local employment ■ Real Property Tax support ■ Vulnerability Assistance	LRP implementation activities

10.0 IMPLEMENTATION RESPONSIBILITIES AND FUNDING

10.1 Roles and Responsibilities

During the construction phase of the Project, the following roles and responsibilities will be implemented by DOĞUŞ-EZE JV. Following the transition period from construction to operation, the roles and responsibilities will be conveyed to TCDD and KGM personnel.

Table 24: Roles and Responsibilities

Level	Detailed Responsibilities	Responsible unit
Central Management		
AYGM Senior Management	AYGM Senior Management will review and approve reports and documents associated with Project implementation and will be responsible for establishing the PIU and appointing technical specialists to effectively audit the implementation of environmental, social and health and safety measures and processes, including this LRP. AYGM will ensure that all relevant activities are executed according to relevant national legislation and PS5 requirements. With specific regards to this LRP, AYGM Senior Management will: ■ Public Interest and Expropriation Decision. ■ Approve the LRP (after Lender's approval). ■ Establish a PIU to implement the Project. ■ Ensure sufficient budget for resettlement and compensation through national legislation and the LRP Fund.	AYGM
AYGM Expropriation Unit	■ Census and Asset Inventory will be prepared in accordance with PS5. ■ Valuation process will be completed. ■ Project Expropriation will be completed.	AYGM
AYGM Project Implementation Unit (PIU)	■ Take on leadership and full commitment for the effective implementation of LRP by AYGM, DOĞUŞ-EZE JV and subcontractor personnel. ■ Ensure allocation of adequate financial and human resources for effective implementation of LRP throughout the Project in line with the Project Standards. ■ Review and approve E&S policies and key E&S management/action (i.e., SEP, ESMP, LRP) plans, including updates, whenever necessary. ■ Approve high-level/key stakeholder engagement strategies (e.g., engagement with central and local governmental stakeholders,	AYGM

Level	Detailed Responsibilities	Responsible unit
	parliamentarians, political party representatives, NGOs, media) before LRP implementation. ■ Monitoring and Evaluation (M&E).	
Local Management		
Environmental and Social Manager	■ Review grievances and ensure/verify that the site teams address the grievances/corrective actions in responsive timeframes in accordance with the Project SEP; approve corrective actions to be implemented. ■ Ensure E&S Performance including LRP implementation. ■ Manage LRP implementation activities and report to PIU. ■ Manage Monitoring and Evaluation (M&E).	DOĞUŞ-EZE JV
Social and LRP Implementation Officer	■ To ensure coordination with land acquisition team. ■ To ensure the implementation of LRP. ■ Reaching rights holders and providing their entitlements. ■ Ensure the LRP and Vulnerability Assistance implementations. ■ Prepare Monitoring and Evaluation (M&E) activities.	DOĞUŞ-EZE JV
Community Liaison Officer (CLO)	■ Ensure compliance of Project's social performance (including implementation of measures/actions related to SEP, GM, LRP) with Project Standards. ■ Ensure effective and periodic communication with the stakeholders during the construction phase. ■ Implementation of the grievance mechanism developed for the Project. ■ Support Environmental and Social Manager and Social and LRP Implementation Officer in the implementation of LRP. ■ Support Monitoring and Evaluation (M&E) activities.	DOĞUŞ-EZE JV
Human Resources	■ Ensure Project labour management practices adhere to the Project Standards and endorsed to the Contractor and subcontractors accordingly. ■ Ensure providing commitments of local employment. ■ Ensure hiring the personnel needed for LRP implementation.	DOĞUŞ-EZE JV

10.2 Time Frame

[NTD: When the LRP draft reaches the disclose stage, the timeline will be determined similar to the table below.]

Table 25: LRP Implementation Schedule

Implementation Topics	Dates
Disclosure of the LRP	November 2024
Census and Asset Inventory preparation (including formal-informal users and vulnerable PAPs)	Before expropriation
Announcement of the eligibility and the entitlements to PAPs	Before expropriation
Compensations according to national legislation	During expropriation
Compensations according to international requirements	During expropriation
Mobilization of the contractor and the subcontractors	After expropriation and full replacement payments
Land entry protocols for the temporary affected lands	After expropriation, before construction
Community level supports	During the Project
Compensations harms and damages	During the Project
Monitoring and Evaluation (M&E)	During the Project, periodically

10.3 Estimated Budget

The realization of a land acquisition process in accordance national legislation shall be complemented by with PS5 and requires additional improvements and payments. For these additional payments, a LRP Fund will be established. A protocol will be signed between the parties for the establishment and management of the LRP Fund. The estimated budget of the LRP Fund presented in Appendix B and contains the following items:

- Cash compensations at full replacement values of lands
- In-kind compensations
- Cash compensations at full replacement values of trees
- Cash compensations at full replacement values of structures
- Public land allocation for de facto owners of the lands/olive gardens
- Cash compensation for unviable lands
- Crop payments to crop owners for standing crops with updated costs
- Crop payment for temporary access barriers to the non-affected lands
- Compensation for harms and damages outside the construction area
- Transitional Livelihood Support (TLS)
- Movable asset transportation support

- Relocation of olive trees to another land
- Priority in local employment
- Real property tax support
- Olive garden preparation support

Signature Page

WSP Danışmanlık ve Mühendislik Ltd. Şti.

Dr. Feray Artar

APPENDIX A

Asset Inventory and Census Template

Shared as a separate excel sheet

This will be hidden during public disclose process

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APPENDIX B

Estimated LRP Budget

Shared as a separate excel sheet

Budget will be hidden during public disclose process

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APPENDIX C

List of Vulnerable Household Members in PAHs

Names will be hidden during the Disclose phase.

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Important note: Names will be hidden during disclose process

Name	Earthquake impact	Disability	Home bound	Woman head of household	Elderly	Illiterate
	Demolished House	1 (have hearing-impaired daughter)	No	No	No	No
	Demolished House	No	1 (mother)	No	No	2 (dad and sister)
		No	No	Yes	No	2 (herself and daughter)
		No	No	No	No	No
		No	No	No	No	1 (wife)
		No	No	No	No	1(wife)
	Demolished House	No	No	No	No	No
	Demolished House	No	No	No	No	1(wife)
	Demolished House	1 (have visually impaired daughter)	No	No	No	1(wife)
	Demolished House	1 (brother)	1 (dad)	No	No	1 (disabled brother)
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No
	Stays in Container	1 (mentally disabled son)	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No

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Name	Earthquake impact	Disability	Home bound	Woman head of household	Elderly	Illiterate
		No	No	Died	No	No
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No
		1 (have deaf-mute brother)	No	No	No	No
	Demolished House and stays in container	No	No	No	No	No
		No	No	No	No	No
		No	1 (mom)	No	No	No
		No	No	No	No	No
		No	1 (mom)	No	No	No
		No	No	No	No	No
	Demolished House build house himself	No	No	No	No	No
		No	No	No	No	No
	Container	1 (have son having neuropathy)	No	No	No	No
	Demolished House	No	No	No	No	No
		No	No	No	No	No
	Stays in container	No	No	No	No	1 (mom)
		No	No	No	No	No
		No	No	No	No	No
		No	No	No	No	No

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