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Enerjisa Üretim Wind Power Plants - Environmental & Social Impact Assessment

Resettlement Framework

June 2024

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Abbreviations

CLQs	Community level Questionnaires
CMB	Capital Markets Board of Türkiye
DFC	International Development Finance Corporation
E&S	Environmental and social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EP IV	Equator Principles IV
EMRA	Energy Market Regulatory Authority
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESPP	Environmental and Social Policy and Procedures
ETL	Energy Transmission Line
GLAC	Guide to Land Acquisition
GM	Grievance Mechanism
HHQs	Household Level Questionnaires
HS	Health and Safety
IESC	Independent Environmental and Social Consultant
IFC	International Finance Corporation
IFIs	International Financial Institutions
IRP	Income Restoration Plan
KIs	Key Informants
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MoAF	Ministry of Agriculture and Forestry

MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OG	Official Gazette
PAHs	Project-Affected Households
PAPs	Project Affected People
PASs	Project-Affected Settlements
PR	Performance Requirement
PS	Performance Standard
RAP	Resettlement Action Plan
RF	Resettlement Framework
RIP	Resettlement Implementation Plan
RRA	Retrospective Resettlement Assessment
SEP	Stakeholder Engagement Plan
TEIAS	Electricity Transmission Company
TLS	Transitional Livelihood Support
VA	Vulnerability Assistance
WPP	Wind Power Plant
YEKA	Renewable Energy Resource Areas

1 Introduction

1.1 Project Overview

Enerjisa Üretim Santralleri Anonim Şirketi has been awarded with the competition took place on 30 May 2019 under the “Competition Announcement for the Allocation of Wind Energy Based Renewable Energy Resource Areas (YEKA) and Total Connection Capacities”¹. Upon this award, a “YEKA Use Rights Agreement” was signed between Enerjisa Üretim Santralleri Anonim Şirketi and Ministry of Energy and Natural Resources (MoENR) on 09 March 2020. Subsequently, the "YEKA Use Rights Agreement" signed by Enerjisa Üretim Santralleri Anonim Şirketi for the Çanakkale Connection Region was transferred to Enerjisa Enerji Üretim Anonim Şirketi (“EnerjiSA Üretim” or “the Project Company”) with the transfer agreements signed on 03 June 2021.

A nine-project wind energy investment package (“the Project”) has been initiated by EnerjiSA Üretim which has a 750 MW total installed power from a total of 180 wind turbines located in the Aegean Region of western Türkiye; aiming to evaluate and utilize the wind energy potential of the region in an efficient manner and contribute to the national strategy and regional economy.

Each sub-project is subject to conducting National Environmental Impact Assessment (EIA) Study in regard with the Regulation on Environmental Impact Assessment² of Türkiye. In this sense, National EIA Reports were prepared for the nine different sub-projects by various environmental consultancy companies. The latest National EIA Report was submitted in March 2023. Upon submission of the latest National EIA Report to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) General Directorate of Environmental Impact Assessment, Permit and Inspection, the “EIA Positive” decision for the Project was secured on 3 April 2023 by the MoEUCC. Upon the submission of latest EIA Report, there was an additional amendment regarding relocation of the wind turbines for different sub-projects. However, the amendment on National EIA process is reported by the Project Company to be completed for all sub-projects at the time of preparation of this Resettlement Framework (RF) Report.

The Project Company is seeking an international finance loan from the International Financial Institutions (IFIs) regarding implementation of the Project under the nine-project package and proposed the Project to the potential IFIs for financing. Accordingly, the nine-project package loan is seeking to be funded by a group of development finance institutions and commercial lenders and with partial coverage by the German ECA Euler Hermes Aktiengesellschaft (“EH”). The lenders altogether are defined as “Project Lenders”. The Project Lenders set requirements to identify, assess, avoid/minimise (where possible), and manage potential environmental and social risks, and impacts associated with the projects for achieving sustainable outcomes in the financed projects as per their commitments for financing a project.

As part of the financing process and achieving the sustainable outcomes within the Project, Mott MacDonald Türkiye (“the Consultant”) has been appointed by EnerjiSA Üretim to undertake an Environmental and Social Impact Assessment (ESIA) Study to identify the impacts that are likely to occur due to implementation of construction and operation activities under the Project and to comply with the requirements set by the IFIs.

The Project includes several parties involved within various Project-related activities. In this sense, as well as its own Project team, the Project Company has appointed several consultancy companies to support during the National EIA process. The consultancy activities include social

¹ Published in the Official Gazette Date/No: 07.11.2018/30588

² Published in the Official Gazette Date/No: 29.07.2022/31907

studies undertaken by Adam & Smith, and environmental monitoring studies of each sub-project for the National EIA undertaken by Nartus.

Furthermore, the Project Lenders have appointed an Independent Environmental and Social Consultant (IESC), namely Ramboll and ACE, for monitoring of the Project in line with the Lenders' standards and requirements. Figure 1.1 indicates to the organisational chart of the Project.

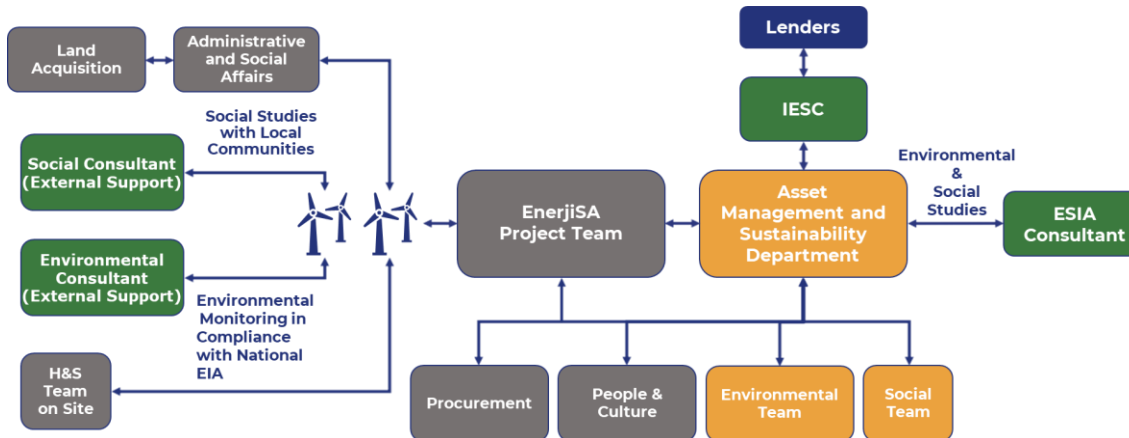


Figure 1.1: Project Organisational Chart

Source: Provided by the Project Company on 16 October 2023.

The IFIs seek compliance with internationally accepted environmental and social standards. Therefore, they require the Project Company to conduct an ESIA study and prepare the ESIA Report together with the relevant sub-plans.

This document represents the Resettlement Framework (RF) which has been prepared within the scope of the ESIA studies of the Project and in line with the requirements of the Performance Standard (PS) 5 of International Finance Corporation (IFC), Performance Requirement (PR) 5 of the European Bank for Reconstruction and Development (EBRD), the Equator Principles IV (EP IV), and Environmental and Social Policy and Procedures (ESPP) of the DFC as well as the Turkish national legislation.

1.2 Overview of Subprojects

Brief descriptions of each subprojects together with the Energy Transmission Line (ETL) route information³ provided under this Section.

1. **Kestanederesi WPP Project:** Kestanederesi Wind Power Plant Project with 28 turbines and 117.6 MWm/117.6 MWe total installed power, is planned to be implemented in Aydın Province, Nazilli and Kuyucak Districts, Yukarıyakacık and Ağıryakacık Neighbourhoods; Manisa Province, Alaşehir District, Kestanederesi Neighbourhood; and İzmir Province, Kiraz District, Akpınar Neighbourhood. The Project components consist of 28 turbines, a switchyard, an administrative building, Project roads (i.e., access and site roads), a 300 tonnes/hour capacity mobile crushing and screening facility, as well as an ETL as a Project associate facility. The construction period of the Project will be 18 months and the operation period will be 49 years. The construction of the Project has been initiated in the third quarter of 2023 with the

³ Studies on ETL routes are not finalised as of this document was released and can be change in the upcoming period.

construction of the Project roads and is planned to be completed by the first quarter of 2025, with commissioning planned for the fourth quarter of 2025.

ETL: 154 kV; 15 km single circuit ETL Alaşehir substation connection & 154 kV; 30 km single circuit ETL Kiraz RES TM connection (30 km ETL is not within Enerjisa Üretim's work scope)

2. **Harmancık WPP Project:** Harmancık Wind Power Plant Project with 10 turbines and 42 MWm/42 MWe total installed power, is planned to be established in Çanakkale Province, Merkez and Lapseki Districts, Yukarıokçular, Kızılkeçili, Üçpınar and Hacıgelen Neighbourhoods. The Project components consist of 10 turbines, a switchyard, Project roads (i.e., access and site roads), a 68.75 tonnes/hour capacity mobile crushing and screening facility, as well as an ETL as a Project associate facility. The construction period of the Project will be 16 months and the operation period will be 49 years. The construction of the Project has been initiated in the fourth quarter of 2023 with the construction of the Project roads and is planned to be completed by the first quarter of 2025, with commissioning planned for the end of the first quarter of 2025⁴.

ETL: 154 kV, 4.5 km 1272 MCM Üçpınar RES substation connection

3. **Armutçuk WPP Project:** Armutçuk Wind Power Plant Project with 20 turbines and 84 MWm/84 MWe total installed power, is planned to be implemented in Çanakkale Province, Yenice District, Armutçuk Neighbourhood and Balıkesir Province, Büyükşapçı Neighbourhood. The Project components consists of 20 turbines, a switchyard, Project roads (i.e., access and site roads), a 68.75 tonnes/hour capacity mobile crushing and screening facility, as well as an ETL as a Project associate facility. The construction period of the Project will be 16 months and the operation period will be 49 years. The construction of the Project will be initiated in the third quarter of 2024 with the construction of the Project roads and is planned to be completed by the second quarter of 2025, with commissioning planned for the end of the second quarter of 2025.

ETL: 154 kV, 5,5 km 1272 MCM ETL 154 kV Şapdağı RES substation connection

4. **Ovacık WPP Project:** Ovacık Wind Power Plant Project with 13 turbines and 54.6 MWm/54.6 MWe total installed power, is planned to be established in Çanakkale Province, Bayramiç District, Gökçeiçi, Kuşçayır and Karıncalık Neighbourhoods. The Project components consist of 13 turbines, a switchyard, Project roads (i.e., access and site roads), a 68.75 tonnes/hour capacity mobile crushing and screening facility, as well as an ETL as a Project associate facility. The construction period of the Project will be 12 months and the operation period will be 49 years. The construction of the Project has been initiated in the first quarter of 2024 with the construction of the Project roads and is planned to be completed by the fourth quarter of 2024, with commissioning planned for the end of 2024.

ETL: 154 kV, 8 km 2x1272 MCM ETL 154 kV Gülpınar RES substation – Çan Havza substation ETL connection & 154 kV, (11+11) km 1272 MCM two separated single

⁴ Prior to project-specific RAP field work, road construction has started within the scope of Kestanederesi, Harmancık, Ovacık and Uygur WPP. The operations on the lands corresponding to the period before the RAP fieldwork were carried out with deed of consent. No complaints were recorded. Neighbourhood mukhtars were interviewed regarding the construction works, mukhtars stated that there were no complaints from the owners who consented to the works on their land with a deed of consent. These landowners have been compensated according to international standards. In addition, each parcel was evaluated within the scope of RAP and a separate compensation was provided under LRP depending on the economic displacement experienced.

circuits ETL 154 kV Bayramiç Havza substation connection (11+11 km ETL is not within Enerjisa Uretim's work scope)

5. **Ihlamur WPP Project:** Ihlamur Wind Power Plant Project with 18 turbines and 75.6 MWm/75.6 MWe total installed power, is planned to be implemented in Çanakkale Province, Yenice District, Yalroba, Karasu, Güzeloba, Kabalı Neighbourhoods and Balıkesir Province, Gönen District, Fındıklı Neighbourhood. The Project components consists of 18 turbines, a switchyard, Project roads (i.e., access and site roads), a 68.75 tonnes/hour capacity mobile crushing and screening facility and an ETL as a Project associate facility. The construction period of the Project will be 16 months and the operation period will be 49 years. The construction of the Project will be initiated in the fourth quarter of 2024 with the construction of the Project roads and is planned to be completed by the first quarter of 2025, with commissioning planned for the second quarter of 2025.

ETL: 154 kV, 6.5 km 1272 MCM two separated single circuits ETL 154 kV Çan Havza TM – Gönen substation ETL connection

6. **Dampınar WPP Project:** Dampınar Wind Power Plant Project with 11 turbines and 46.2 MWm/46.2 MWe total installed power, is planned to be established in İzmir Province, Tire District, Küçükkale Neighbourhood and Aydın Province, Germencik District, Dampınar Neighbourhood. The Project components consist of 11 turbines, a switchyard, Project roads (i.e., access and site roads) and an ETL as a Project associate facility. The construction period of the Project will be 13 months and the operation period will be 49 years. The construction of the Project will be initiated in the fourth quarter of 2024 with the construction of the Project roads and is planned to be completed by the second quarter of 2025, with commissioning planned for end of the second quarter of 2025.

ETL: 154 kV; 10 km single circuit ETL Nezihe Beren JES substation connection

7. **Hacıhıdırlar WPP Project:** Hacıhıdırlar Wind Power Plant Project with 15 turbines and 63 MWm/ 63 MWe total installed power, is planned to be established in Aydın Province, Karacasu District, Karacaören and Ataköy Neighbourhoods; Denizli Province, Sarayköy and Babadağ District, Kıranyer, Yeşilyurt and Hisar Neighbourhoods. The Project components consist of 15 turbines, a switchyard, Project roads (i.e., access and site roads) and an ETL as a Project associate facility. The construction period of the Project will be 13 months and the operation period will be 49 years. The construction of the Project will be initiated in the fourth quarter of 2024 with the construction of the Project roads and is planned to be completed by the third quarter of 2025, with commissioning planned for end of the third quarter of 2025.

ETL: 154 kV; 12.5 km single circuit ETL Denizli RES substation connection

8. **Uygar WPP Project:** Uygar Wind Power Plant Project with 60 turbines and 252 MWm/250 MWe total installed power, is planned to be implemented in Balıkesir Province, Burhaniye and Savaştepe Districts, Haydar, İkizce, Büyükyenice and Taşdıbi Neighbourhoods; İzmir Province, Bergama District, Oruçlar, Ürkütler, Yukarıada, İneşir, Alhatlı, Durmuşlar, Çamoba and Kozluca Neighbourhoods; Manisa Province, Soma District, Kiraz Neighbourhood. The Project components consist of 60 turbines, two switchyard, Project roads (i.e., access and site roads), a 200 tonnes/hour capacity mobile crashing and screening facility and internal ETL to connect the switchyards and as well as an ETL as a Project associate facility. The construction period of the Project

will be 21 months and the operation period will be 49 years. The construction of the Project has been initiated in the first quarter of 2024 with the construction of the Project roads and is planned to be completed by the fourth quarter of 2025, with commissioning planned for end of 2025.

ETL: from 400 kV Uygur RES substation to 400/154 kV Bayramiç Havza substation, 123 km 3B Pheasant, 1272 MCM ETL, from 400 kV Uygur RES substation to 400/154 kV İzmir Havza substation, 13.1 km 3B Pheasant 1272 MCM ETL (123 km ETL is not within Enerjisa Uretim's work scope)

- Akköy WPP Project:** Akköy Wind Power Plant Project with six turbines and 25.2 MWm/25.2 MWe total installed power, is planned to be established in Aydın Province, Didim District, Akköy and Yeniköy Villages. The Project components consist of six turbines, a switchyard, Project roads (i.e., access and site roads) and an ETL as a Project associated facility. The construction period of the Project will be 10 months and the operation period will be 49 years. The construction of the Project has been initiated in the first quarter of 2023 with the construction of the Project roads and was planned to be completed by the fourth quarter of 2023, with commissioning planned for the end of 2023. Akköy WPP has been operational since January 2024.

ETL: ETL has been established and operational since January 2024.

The Table 1.1 below summarises the land acquisition situation in nine different Projects. This table provides an overview of land sizes, ownership status and forest coverage for each Project. These parcels cover the turbines, access roads and switchyards and all other key elements of Project infrastructure other than the ETL. The distinction between private and public lands is evident in the data presented. Land procedures for Akköy WPP have been completed.

Table 1.1: Lands Needed for Sub-projects

Sub-project	Private Land		Public Land	
	Size of lands (m ²)	No. of owners/ shareholders	Size of lands (m ²)	Size of forest lands (m ²)
Kestanederesi	67,646.26	154	151,790.40	711,605.12
Uygur	563,052.49	305	54,538.60	1,562,575.19
Akköy	0	-	227,270.16	0
Ovacık	70,238.51	24	0	378,713.45
Harmancık	30,101.18	75	8,773.68	461,081.44
Armutçuk	210,221.65	97	16,638.80	571,064.79
İhlamur	72,548.00	48	25,541.42	574,003.00
Hacıhıdırlar	216,837.90	131	4,797.71	356,687.48
Dampınar	27,212.33	19	28,955.21	485,595.94
Total	1,257,858.32	853	518,305.98	5,101,326.41

The forest lands listed in the table will not be directly utilized for the Projects. Instead, they represent the area covered by the Project Company's license. The specific utilization of these forested lands will be decided during the construction process based on Project requirements.

The table below shows number of parcels for which land acquisition procedures have been completed to date:

Table 1.2: Completed Land Transactions

Project	Private Lands	Treasury Lands	Lands belonging to Legal Entities
Harmancık	53	0	6
Ovacık	19	0	0
Kestanederesi	20	11	0
Uygar	279	0	14
Akköy	0	4	0

1.3 Objective and Scope of the Resettlement Framework

This RF has been prepared to address the potential social risks and impacts related to the land acquisition, expropriation and urgent expropriation activities that are identified in the ESIA process of the Project.

The objective of this RF is to clarify regulatory framework for resettlement activities, define resettlement principles and organizational arrangements, design the eligibility criteria, set out procedures and standards for compensation, and describe the stakeholder engagement and consultation requirements as well as external grievance mechanism to be applied throughout the Project lifecycle.

This RF clarifies resettlement principles to be applied during implementation and the organizational arrangements for the preparation of the Resettlement Action Plans (RAPs) for each of the sub-projects. The RF also includes arrangements for the Project Company for RAP preparation and implementation, and ensuring consistency with the Lenders' requirements and standards (particularly IFC PS 5, EBRD PR 5, EP IV Principles, and DFC ESPPs), and the national legislation.

In summary, the particular objectives of the RF are provided below:

- To provide information on the national legislation and Lenders' standards in terms of governing land expropriation,
- To identify potential land-based impacts and their magnitude, affected parties including vulnerable groups,
- To set out the steps of land acquisition process and organizational arrangements for the Project Company,
- To define potential entitlements and prepare a strategy for achieving the objectives of the resettlement as well as land acquisition,
- To provide a framework implementation to ensure timely acquisition of assets, provision of compensation and delivery of other benefits to the Project Affected People (PAPs),
- To implement an accessible mechanism for lodging grievances and a system for managing the received grievances received,
- To provide information on consultation, participation and grievance mechanisms in the Project implementation,
- To determine the required resources for implementation of the RAP,
- To present a framework for supervision, monitoring and evaluation of resettlement implementation, and
- To provide guidance for preparing the resettlement budget.

2 Land Acquisition Principles of the Project

Land acquisition and resettlement, including establishing easement rights, will be governed by the following principles:

- The relevant Turkish legislation, IFC PS 5 and EBRD PR 5 will both be followed, in cases where there are gaps between the legal regimes, measures will be taken to meet the standards set in IFC PS 5 and EBRD PR 5.
- Sub-projects may necessitate ownership rights or easements to be established on subject lands. Permanent land take will require ownership rights to be established while easement rights will be established on lands that will require temporary land take. On lands where easement rights are established, land may be handed back to rightful owners with some restrictions, such as not building any structures or planting deep rooted plants, crops and trees, allowing for the land to be used to a certain extent. The property and inheritance rights of persons will be respected.
- Potential economic and social impacts of land acquisition/resettlement on the PAPs (on livelihood of them also) will be assessed.
- The resettlement process will be based on a detailed census/survey of the PAPs, which provides baseline household data for the PAPs, along with the full inventory of land and assets to be affected.
- Categories of stakeholders, including vulnerable groups, will be identified and consulted.
- Categories of the PAPs and their respective entitlements will be identified.
- The public will be fully informed, and processes will be transparent. Furthermore, the PAPs will be meaningfully consulted and they will be given opportunities to participate in planning and implementation of resettlement programs.
- All possible steps will be taken to minimize acquisition of productive, privately owned land and to avoid acquisition of residential areas (and thus involuntary resettlement) through careful selection of the needed sites.
- Valuation of land, businesses, and other assets for which compensation is given will be based on the full replacement cost as defined in IFC PS 5 and EBRD PR 5.
- In the case of agricultural land, valuation of the land will include crops value as well as other land related livelihoods and assets.
- In cases when there are people working on the affected land or businesses, but they are not landowners (tenants, users, or wage earners), the compensation should be in an amount or manner to ensure that they will not be worse off than before the Project.
- Regardless of the formality of ownership, for those whose livelihood depends on land and common resources, (including common lands), the compensation provided would be at the level to ensure that the PAPs could restore their livelihood to pre displacement levels.
- If the land needed for expropriation is public land used informally, the PAPs without formal title will be compensated for the crops, assets on the land, and any investment they have made on the land. In the case where land is needed on a temporary basis, owners will be compensated at full market rental price for the period during which the land is used, and the land will be given back to the owner in the same condition as before it was rented.
- In exceptional cases if resettlement is unavoidable, in addition to the full replacement cost, the PAPs will be provided assistance for relocation and related expenses in line with the resettlement plans.
- Special outreach, consultation and assistance programs for vulnerable groups (if any) including the persons without any immovable property, will be provided.

- The Project will provide and prepare the plans for grievance redress and RAP implementation monitoring in line with the IFC PSs and EBRD PRs.
- Land acquisition and resettlement activities will be monitored and reported on a regular basis to ensure timely and effective implementation of RAPs. The effectiveness of the livelihood assistance in restoring livelihoods will also be monitored and evaluated in case there is need for additional assistance to be provided.
- Preparation and implementation of the RAP will be done in a transparent manner with the participation of the PAPs and relevant institutions.
- All relevant stakeholders will be informed and updated as deemed necessary on the sub-projects' land requirements, their RAP implementation process, entitlements and grievance mechanisms etc.
- Any such infrastructure facilities as roads, water pipelines, and communication networks etc. disrupted by the construction of sub-projects will be replaced.
- All needed steps will be taken to ensure compensation, registration and transfer issues are resolved with owners without seeking court intervention, unless unavoidable.
- PAPs will be compensated fully before construction begins and all activities and procedures will be formally documented.
- Expropriation Law No. 2942 shall be taken into consideration in the determination of compensation amount to be paid to the PAPs. In cases where the full replacement value required by IFC PS 5 and EBRD PR 5 is higher than that awarded by the Expropriation Law, full replacement value will be used. In cases where easement right will need to be established, there would be partial compensation. For long term easement, the plot price determination for compensation cannot surpass 50% (35% in a rural area) of value of the market price of the whole parcel in an urban area if the land were sold. However, in those exceptional cases where the market value of the land acquired for the long-term easement is higher than the 50% (or 35%) threshold for compensation, then the Project would expropriate the entire parcel of land and provide full compensation to the owner for the acquired land.

3 Process for the Preparation and Approval of the Resettlement Action Plans

A RAP (Please see Appendices Section A.1 for the outline) is required for any land acquisition and/or resettlement from private individuals or private commercial entities carried out by the Project Company after the RF has been approved. This is regardless of when the corresponding sub-loan/sub-financing agreement is signed. The sub-project level RAPs that will be prepared to mitigate their specific land acquisition issues will follow the below principles of the RF and be consistent with this RF:

- For sub-projects with minor land acquisition or restrictions on land use, as a result of which there will be no significant impact on incomes or livelihoods, sub-project specific RAPs establish eligibility criteria for the PAPs, set out procedures and standards for compensation, and incorporate arrangements for consultations, monitoring and addressing grievances,
- For sub-projects causing physical displacement, the RAP will set out the additional measures relevant to relocation of PAPs,
- For sub-projects involving economic displacement with significant impacts on livelihoods or income generation, the RAP will set out the additional measures relating to livelihood improvement or restoration; and
- For sub-projects that may impose changes in land use that restrict access to resources in legally designated parks or protected areas or other common property resources (such as pasturelands or lands used for animal grazing) on which local people may depend for livelihood purposes, the RAP will establish a participatory process for determining appropriate restrictions on use and set out the mitigation measures to address adverse impacts on livelihoods that may result from such restrictions.

Within the scope of the Project eight specific RAP will be prepared. The aim is to finalize the RAPs by June 2024. Afterward, disclosure versions of these plans will be shared with the affected communities. Since the Akköy Project is already operational and no further land acquisition is necessary, there won't be a RAP. Instead, a summary document containing a retrospective review and assessments will be prepared

As noted in IFC's Good Practice Handbook – Land Acquisition and Involuntary Resettlement⁵ published in October 2023, in the case of renewable energy projects, considerable effort is usually (and should be) made to avoid displacement impacts. Private developers could seek to minimise impacts by siting facilities away from inhabited or cultivated areas, and by designing the project through alternative analyses so that land can be acquired through negotiated transactions without resorting to expropriation.

The expropriation procedure starts after the Project Company determines the need to acquire land or other properties and related assets as a result of a given sub-project. The feasibility studies carried out and relevant documents prepared for each sub-project. The information regarding the land needs are obtained from these feasibility studies.

While determining the lands needed for each sub-project, criteria that will minimise the negative social and economic impacts arising from land acquisition will be taken into consideration by avoiding resettlement as much as possible. For this purpose, in the determination of the project

⁵ Retrieved from <https://www.ifc.org/en/insights-reports/2023/handbook-land-acquisition-and-involuntary-resettlement> on 25 December 2023

site, state lands will be preferred by avoiding private parcels as much as possible, especially the living areas with buildings, where technical conditions are suitable.

Consistent with best practice as indicated in IFC PS 5 and EBRD PR 5, the Project Company will conduct a survey of the land, crops, buildings, and a household survey of all PAPs. This will form the basis of land acquisition and/or resettlement plans. This survey, along with the census of the PAPs should be carried out as soon as possible after the identification of a given sub-project for which there is a need for displacement, land acquisition, or resettlement. The household survey is the primary means of data collection, which should be conducted as soon the project area is defined. The household survey should establish the status of the PAPs and cover all the persons who will be affected by the Project, land and assets to be affected, who will be eligible for compensation and assistance. It will include household composition and characteristics, socio-economic status, and sources of livelihoods.

If land acquisition efforts begin one year after the household survey, the information collected should be updated by the Project Company for any changes that may have occurred during this period.

Following the completion of the census/surveys, Project-specific RAPs will be prepared for each sub-project. RFs will set out the policy principles and spells out the entitlements, eligibility criteria, institutional arrangements for monitoring and evaluation, the framework for participation as well as mechanisms for grievance redress.

The RAP will be submitted to the Lenders by the Project Company. The Project Company is responsible for the implementation of the RAPs in compliance with the Lenders' requirements. The RAPs should be completed, disclosed and implemented before the construction starts on the site.

If the Project Company will acquire lands only from public institutions, again the subject land will need to be assessed for any formal or informal land use before the sub-project is considered not to have any land-based impacts and thus exempt from the application of IFC PS 5 and EBRD PR 5. The Project Company will be responsible to reflect the land acquisition procedures (expropriation, easement, allocation, transfers, permits etc.) in a semi-annual Monitoring/Progress Report by using the format provided in Appendices Section A.2 of this RF.

However, if the evaluation concludes there is use of public land by users (both formal and informal), the Project Company will be responsible of preparing a RAP to address measures for land-based livelihood losses of the land users.

4 Legal Framework

4.1 National Legal Framework for Land Acquisition and Resettlement

4.1.1 Land Acquisition

According to the Turkish legislation, the land acquisition, expropriation and urgent expropriation processes are based on the Expropriation Law No. 2942 (Official Gazette (OG) Date/Number: 08.11.1983/18215) and relevant laws concerning amendments to the Expropriation Law.

Compensation for the expropriated estate is determined pursuant to procedures and principles in Articles 8, 10 and 11 of the Expropriation Law No 2942. Valuation criteria are stated in the Article 11 of the Law. The Expropriation Law defines that determination of the compensation for the expropriated land depends on average annual net income derived from that land by taking into account rotation system, valuation of structures includes the calculation of construction unit prices, and valuation of plots (housing) depends on peer assessment. The valuation commission is internally established by the organization responsible for land acquisition and comprised of at least three members. In case of a necessity, this commission can get information from the Chamber of Industry and Commerce, real estate agencies and other individual or institutional authorities that are specialized on those points.

In addition, Article 46 of the Turkish Constitution explains that state and legal public entities, in cases of public benefit, are entitled to entirely or partially expropriate immovable properties in private possession, on condition that the real value of those immovable properties are paid in advance and in cash; and to establish easement rights on these immovable properties in compliance with the procedures and principles set by the Expropriation Law. In other words, the Constitution implies that any immovable property cannot be confiscated unless its expropriation compensation is paid to the owner/s in advance and in cash.

Steps to be followed during the land expropriation process in line with the Turkish legislation are provided in the next section.

4.1.1.1 Announcement

The Valuation Commission delivers the valuation document to the Negotiation Commission, which is internally established by the responsible agency. The Negotiation Commission includes three members from the Project Company acquiring the land and conducts negotiations with property owners on the compensation package for the acquired land and assets that will be lost/displaced.

Then, the Project Company notifies the PAPs through an official registered mail and invites them for negotiations. The notification mentions the intention of the Project Company to purchase the land (or to establish easement right on the land in question) through a negotiated settlement and clearly describe steps in the land acquisition process. The notification also sets out provisions for litigation available to the landowner and relevant steps in case the landowner would like to use the right to petition the courts for a higher compensation amount.

In case of the owners do not live on the land, reasonable efforts are made to reach them by:

- Local inquiries for current address research from villagers and village head (mukhtars),
- Inquiry of last known residence from land registry and cadastre records, and law enforcement records through their national identification number, and
- Official advertisement in newspaper pursuant to Article 10 of the Expropriation Law 2942.

If the owners can still not be reached, the compensation for the land is deposited in their name to a bank account. The owner can withdraw the compensation from the deposited bank account at any point in time.

If the land has multiple owners, each owner is notified and compensated in the same manner as described above on the basis of their percentage ownership as recorded in the title deed in government records. If there is an active dispute among multiple owners as to the ownership percentage of each, the entirety of the compensation will be placed in an escrow account and paid out to each after the dispute is resolved.

4.1.1.2 Transaction

The purchase of land and affected properties can take place through two processes, which are negotiated settlement or court settlement.

Negotiated Settlement

The process for purchasing the land and the related immovable property through negotiated reconciliation, pursuant to the principles and procedures set out in Article 8 of Expropriation Law and this RF. If the owner agrees to a negotiated settlement, then discussions between the owners and the Project Company take place to finalize the transaction.

Minutes of the proceedings regarding this agreement are signed by two sides. The process is followed by the payment of the expropriation compensation to the rightful owner within 45 days and the property is registered in the name of government following alienation. This way of purchase is considered as expropriation and right to sue against this expropriation and amount of expropriation compensation cannot be processed. The Project Company should make it clear that negotiations will last for no more than three months and will provide the landowner a description of the land acquisition steps as well as the owner's rights to due process and litigation at each step. Failure to reach a negotiated settlement will result in a court settlement, which is described below.

Court Settlement

A court settlement will occur in the following conditions:

- the negotiated settlement fails; or
- the owner, after receiving notification from the Project Company, declines to negotiate; or
- in case of customary rights; or
- in case of deceased or absentee owners.

Prior to requesting a court settlement, rights to due process and litigation will be explained fully to the landowner.

A lawsuit will be filed by the Project Company with a relevant court of first instance for valuation and registration, pursuant to Article 10 of the Expropriation Law. The costs of the court process are born by the responsible agency according to the Expropriation Law. Particularly, in case of the court process cannot be concluded within four months, legal interest rate is applied to determined compensation amount as from this deadline.

In general, according to the Article 12 of the Expropriation Law, if a land is partially expropriated and in case of the remaining part is not usable, this part shall also be expropriated upon the request of the owner within 30 days following receiving expropriation decision.

4.1.1.3 Urgent Expropriation

Article 27 of the Expropriation Law authorizes the organization responsible for expropriation to confiscate the immovable assets required by the project earlier than the time needed in normal expropriation procedure. This process does not prevent challenges of the property owners against the determined valuation. If the urgent expropriation is unavoidable, right owners (displaced persons) should be meaningfully informed about the expropriation of needed immovable properties and initial compensation at initial phase of land acquisition by responsible agency.

Pursuant to Article 15, it is compulsory to form a committee of experts of at least three persons, depending on the type and nature of the land to be expropriated. One of the experts must be chosen from among experts with a master's degree or doctorate in real estate development or from among real estate appraisers authorised in accordance with the Capital Market Law of 6 December 2012, number 6362.

The decision of the court to seize the immovable property shall be notified to the land registry office. The provision that the immovable property cannot be transferred, alienated or assigned to another person shall be annotated in the land registry.

It should be noted that some lands acquired for the access roads and wind turbines are subject to urgent expropriation within the scope of the each sub-project.

4.2 Lenders' Standards on Resettlement

The land acquisition activities and requirements of the Project are assessed and planned by considering the following international standards:

- IFC's Performance Standards on Environmental and Social Sustainability (2012)
 - Performance Standard 5 – Land Acquisition and Involuntary Resettlement: Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the Performance Standard.
- EBRD's Environmental and Social Policy & Performance Requirements (2019)
 - Performance Requirement 5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement: During all Project-related land acquisition processes, PR 5 requires engaging with the local community members and communities through meaningful consultation, and disclose relevant information throughout the planning, implementation, monitoring and evaluation of land acquisition, and resettlement process including livelihood improvement. The Client should ensure that all groups, including the vulnerable are informed and made aware of their entitlements, rights, opportunities, and benefits.
- Equator Principles IV (2020)
- DFC Environmental and Social Policy and Procedures (2020)

In addition to the Lenders' standards on resettlement, IFC has published a Good Practice Handbook on Land Acquisition and Involuntary Resettlement in October 2023. The good practice handbook will also be taken into consideration during the implementation of the RAPs.

4.2.1 Involuntary Resettlement

In case of physical or economic resettlement comes into agenda within the scope of the Project, the Project Company can provide collaboration with other organizations related to resettlement planning and implementation.

Resettlement is considered involuntary when affected people or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

4.3 Gap Analysis

National legislation and processes regarding land acquisition have a long-lasting history in Türkiye. They have been updated in the years of implementation to improve the process to solve the problems encountered and to incorporate some requirements from international best practice. However, there are still some issues creating gaps between Turkish legislation and IFC PS 5 and EBRD PR 5. In this regard main gaps can be summarized under the following issues:

Compensation/assistance to renters, and other informal users of lands, who do not own property: According to Lenders' standards and requirements, as well as official users of the land, unofficial users of the land are also defined as PAPs. Turkish legislation does not require payment of compensation to tenants and unofficial users of land/properties. However, according to Lenders' procedures, persons who have spent money, planted crops, or constructed buildings or other structures on the lands of other persons are compensated at full replacement cost. They are also compensated for standing crops and economic trees they planted on the land they use unofficially, and assistance if needed to restore income/livelihood lost as a result of being displaced from the land in question.

Compensation provided will ensure that the livelihoods of renters and other informal users of land are not affected. In addition to the legal compensation amount for the official landowners, for other people who have no legal rights, costs will be provided from the Project Company.

Replacement Cost: According to the Lenders' policies, loss of immovable such as land and other fixed assets should be compensated at full replacement cost before the construction starts. Considering that the cash equivalent to replacement cost will be used as a compensation method, legal landowners will be compensated for loss of land and tenants, public land users and squatters would be entitled to the replacement cost of what they have invested in the land. According to Turkish legislation, only the legal property owners can get monetary compensation and there is a clause in the law indicating that depreciation shall be deducted in the valuation process for the buildings (for expropriation), which may cause the expropriation value to be less than the full replacement cost as defined in IFC PS 5 and EBRD PR 5 (which does not allow for applying depreciation). The compensation for the loss of income, access to common properties or social losses (such as opportunity costs) are not clearly stated in the Turkish legislation. The difference between full replacement cost and compensation to be paid will be provided from the Project Company. Project where the Project Company have not budgeted for these costs in their investment proposal and RAP will not be eligible for financing.

Request for the expropriation of unviable land due to partial expropriation: According to the law, landowners subject to partial expropriation have a right to request the expropriation of the remaining land within 30 days. IFC PS 5 and EBRD PR 5 do not define a time limit for such requests. During the notification of land acquisition stage, the Project Company will clearly communicate to land owners that they have 30 days to make such a request and offer to provide legal services if they need such services.

Compensation for Loss of Communal Assets: According to Lenders' standards and requirements, for persons whose livelihoods are natural resource-based and where project-

related restrictions on access 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. Communal assets are compensated according to Article 30 of Expropriation Law. The 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.

If there has been loss of income due to land acquisition in the use of public property, mitigation measures and supports will be provided under the RAP-LRP Fund. Users on public lands will also be compensated for crops through the Fund.

Livelihood Restoration Plan & Strategy: The initiative involves taking over both publicly and privately owned agricultural, forest, and pasture lands, likely leading to economic displacement. In line with international development guidelines, enhancing the long-term resilience and adaptability of livelihoods for Project-Affected Settlements (PASs) and Project-Affected Households/Persons (PAHs/PAPs) is prioritized. Thus, beyond the RAP, a Livelihood Restoration Plan (LRP) may be developed to rehabilitate livelihood activities and ensure the sustainability of the PAHs' livelihoods. An analysis of the main and supplementary income streams of affected households reveals the significance of agriculture and livestock farming, which are the sectors most impacted by the Project's land acquisition. Consequently, specific plans for agriculture and livestock farming have been integrated into the LRP. Also, according to PS5 the borrower will provide transitional support to all economically displaced. PAHs that cannot be eliminated of livelihood losses with the compensation provided for all PAPs. Transitional Livelihood Support (TLS) will be provided in different amounts for these groups.

Asset Inventory and Socioeconomic Census: PS 5, where land acquisition or land use restrictions are unavoidable, requires to identify people who will be affected by the Project as part of the Borrower's environmental and social assessment, create a land inventory, and it is necessary to determine who is eligible for compensation and assistance to discourage ineligible persons, such as opportunistic settlers, from seeking assistance. In this context, Turkish Law requires the preparation of an asset inventory. However, the national requirement is limited to counting immovable assets and legal title holders. Census and basic information on the Project affected population as defined by IFC PS5 is required, including tenants, users of common lands, landowners/residents without legal or traditional titles. In addition, all parcels to be acquired will be examined and structures and outbuildings will be noted.

Measures for Vulnerable Persons: Lenders' standard 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 Expropriation Law does not address vulnerability. While the process considers social issues such as tensions, settlement relations, it does not specify approach for vulnerability and does not identify a strategy to ease the transition of vulnerable groups. Within the scope of RAP, vulnerable groups will be identified and entitled. A RAP-LRP Fund will be established for additional compensation of livelihood losses of affected persons/communities.

Scope of Project Affected People: According to Turkish legislation, only people who lose legally owned land are considered as PAPs. Thus, the possible losses of other PAPs such as non-title holders and users of public lands, host populations, nomadic people/migrants (using the project area) or economically displaced people are not recognized and there are no provisions to mitigate the adverse effects of the projects on these people. In Turkish legislations, most of these groups are not considered as PAP. For such people who are affected and fall

under the definition of IFC PS 5 and EBRD PR 5, mitigation measures such as occupational education, job opportunities or assistance in using or working on land legally etc. will be provided. Such mitigation measures should ensure that livelihoods of the PAPs are, at a minimum, restored to pre-project levels, all of their affected assets are compensated for, and their housing, at a minimum, is restored to a pre-project level of quality and tenure.

Resettlement Action Planning: There is no statutory arrangement for preparation of a Resettlement Action Plan covering all displaced persons and host families. Therefore, the preparation of RAPs by the sub-borrowers will be required. If land is acquired before the subloan agreement is signed, Also, for the projects that entail additional land acquisition in the future, proactive study and reporting will be carried out by the sub-borrowers.

Public Information Disclosure, Consultation and Participation: There are no provisions regarding information disclosure to public, public consultation and participation in the Turkish legislation regarding land acquisition. In the scope of normal expropriation procedures, an invitation letter is sent to property owners with the aim of informing and inviting rightful owner to negotiations within 15 days. Therefore, the rightful owner becomes aware of land acquisition and has the opportunity to negotiate and/or challenge the proposed compensation amount. IFC PS 5 and EBRD PR 5 require full public disclosure of RF and RAPs. For this project, the Project Company is responsible for arranging consultation meetings with the PAPs before land acquisition procedures begin to inform them about the land requirements of the sub-projects as well as the availability of a RF, the draft RAPs that include entitlements, and resettlement planning and implementation if any. In addition, the RF and RAPs will be disclosed at the local level and on the Project Company's website. The Project Company will also notify the other affected groups and stakeholders without formal rights, including those who have made investments in the public land or are occupying the land without formal rights, as well as tenants, through an official letter which would be sent at the same time as they are notifying the land and property owners. In the letter, information about the related sub-projects and impacts due to land requirements will be provided.

Grievance Mechanism (GM): There are channels for lodging grievances under different laws of Türkiye (Expropriation Law No. 2942, Law on Right to Information No. 4982, Law on Preservation of Personal Data No. 6698, Law on Use of the Right to Petition No. 3071), but these are through more formal and legalistic mechanisms. For this project, grievance mechanisms will be developed within the Project Company, consisting of accessible and documented grievance handling at sub-project level. These project level grievance mechanisms are supplementary, but do not substitute for the formal legal mechanisms, which remain available to PAPs who choose to pursue them.

5 Socio-economic Baseline

The population and gender distribution of the settlements within the scope of the Project are given in Table 5.1 to Table 5.9. Detailed information about the economic livelihoods, education, health and infrastructure of the settlements will be given in detail in the RAPs.

Table 5.1 given below summarizes the population and gender distribution of the Project affected settlements of the Harmancık WPP.

Table 5.1: Population of the Project affected settlements of the Harmancık WPP

Name of the settlements	Total population	Male	%	Female	%
Kızılkeçili	186	92	49.46	94	50.54
Yukarıokçular	89	51	57.30	38	42.70
Yapıldak	463	226	48.81	237	51.19
Musaköy	166	84	50.60	82	49.40
Hacıgelen	80	40	50	40	50
Üçpınar	60	31	51.6	29	48.4
Beybaş	146	76	52	70	48

Source: Nufusune, Statistics on Population, 2022^{6,7}

Table 5.2 given below summarizes the population and gender distribution of the Project affected settlements of the Armutçuk WPP.

Table 5.2: Population of the Project affected settlements of the Armutçuk WPP

Name of the settlements	Total population	Male	%	Female	%
Kocaseyit	1,736	885	50.9	851	49.1
Halılar	274	142	51.8	132	48.2
Armutçuk	219	106	48.4	113	51.6
Hüseyinbeyobası	201	107	53.2	94	46.8

Source: Nufusune, Statistics on Population, 2022^{8,9,10}

Table 5.3 given below summarizes the population and gender distribution of the Project affected settlements of the Ovacık WPP.

⁶ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/merkez-ilce-nufusu-canakkale on 20 December 2023 alasehir-ilce-nufusu-manisa

⁷ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/lapseki-ilce-nufusu-canakkale on 20 December 2023

⁸ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/havran-ilce-nufusu-balikesir on 20 December 2023

⁹ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/yenice-ilce-nufusu-canakkale on 20 December 2023

¹⁰ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/ivrindi-ilce-nufusu-balikesir on 20 December 2023

Table 5.3: Population of the Project affected settlements of the Ovacık WPP

Name of the settlements	Total population	Male	%	Female	%
Gökçeici	58	30	52%	28	48%
Kuşçayır	135	66	49%	69	51%
Karıncalık	218	111	51%	17	49%
Çatalçam	88	42	48%	46	52%
Denizgöründü	144	74	51.3%	70	48.7%
Taşlıtarla	78	41	52.6%	37	47.4%

Source: Nufusune, Statistics on Population, 2022^{11,12}.

Table 5.4 given below summarizes the population and gender distribution of the Project affected settlements of the Ihlamur WPP.

Table 5.4: Population of the Project affected settlements of the Ihlamur WPP

Name of the settlements	Total population	Male	%	Female	%
Fındıklı	366	178	48.6	188	51.4
Yalıoba	34	19	55.8	15	44.2
Güneşli	129	69	53.5	60	46.5
Canbaz	83	35	42.1	48	57.9

Source: Nufusune, Statistics on Population, 2022^{13,14}.

Table 5.5 given below summarizes the population and gender distribution of the Project affected settlements of the Dampınar WPP.

Table 5.5: Population of the Project affected settlements of the Dampınar WPP

Name of the settlements	Total population	Male	%	Female	%
Dağyeni	854	418	48.9	436	51.1
Dampınar	302	157	51.9	145	48.1
Habibler	164	76	46.3	88	53.7
Selatin	405	211	52.1	194	47.9

Source: Nufusune, Statistics on Population, 2022¹⁵.

Table 5.6 given below summarizes the population and gender distribution of the Project affected settlements of the Hacıhıdırlar WPP.

¹¹ Nufusune, 2022 Statistics on Population, Retrieved from nufusune.com/bayramic-ilce-nufusu-canakkale on 20 December 2023.

¹² Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/merkez-ilce-nufusu-canakkale on 20 December 2023

¹³ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/gonen-ilce-nufusu-balikesir on 20 December 2023.

¹⁴ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/yenice-ilce-nufusu-canakkale on 20 December 2023.

¹⁵ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/germencik-ilce-nufusu-aydin on 20 December 2023.

Table 5.6: Population of the Project affected settlements of the Hacıhıdırlar WPP

Name of the settlements	Total population	Male	%	Female	%
Ataköy	1073	537	50	536	50
Hisar	267	138	51.7	129	48.3
Kıranyer	62	33	53.2	29	46.8
Yeşilyurt	71	36	51	35	49
Karacaören	391	212	54.2	179	45.8

Source: Nufusune, Statistics on Population, 2022^{16,17,18}

Table 5.7 given below summarizes the population and gender distribution of the Project affected settlements of the Kestanederesi WPP.

Table 5.7: Population of the Project affected settlements of the Kestanederesi WPP

Name of the settlements	Total population	Male	%	Female	%
Osmaniye	628	333	53	295	47
Kozluca	510	258	50.58	252	49.42
Evrenli	309	158	51.13	151	48.87
Bahçedere	63	30	47.6	33	52.4
Dağhacıyusuf	1,590	830	52.2	760	47.8
Akpınar	1,259	648	51.4	611	48.6
Ören	593	317	53.4	276	46.6
İğdeli	1,457	750	51.5	707	48.5
Altınoluk	476	242	50.8	234	49.2

Source: Nufusune, Statistics on Population, 2022^{19,20}

Table 5.8 given below summarizes the population and gender distribution of the Project affected settlements of the Uygur WPP.

¹⁶ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/karacasu-ilce-nufusu-aydin on 20 December 2023.

¹⁷ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/saraykoy-ilce-nufusu-denizli on 20 December 2023.

¹⁸ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/babadag-ilce-nufusu-denizli on 20 December 2023.

¹⁹ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/alasehir-ilce-nufusu-manisa on 20 December 2023.

²⁰ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/kiraz-ilce-nufusu-izmir on 20 December 2023.

Table 5.8: Population of the Project affected settlements of the Uygar WPP

Name of the settlements	Total population	Male	%	Female	%
Alhatlı	247	117	47.3	130	52.7
Göçbeyli	61	30	49.2	31	50.8
İneşir	126	56	44.4	70	55.6
Sarıcaoğlu	104	54	51.9	50	48.1
Durmuşlar	386	200	51.8	186	48.2
Yalnızdam	79	29	36.7	50	53.3
Çamoba	72	40	55.5	32	44.5
Kaplan	51	24	47	27	53
Kiraz	124	58	46.8	66	53.2
Yayladalı	32	16	50	16	50

Source: Nufusune, Statistics on Population, 2022^{21,22}

Table 5.9 given below summarizes the population and gender distribution of the Project affected settlements of the Akköy WPP.

Table 5.9: Population of the Project affected settlements of the Akköy WPP

Name of the settlements	Total population	Male	%	Female	%
Yalıköy	2,485	1,304	52.5	1,181	47.5
Akköy	1,103	591	53.6	512	46.4

Source: Nufusune, Statistics on Population, 2022²³

Additional information regarding the socioeconomic baseline of the affected settlements and households will be provided in the separate RAPs. Moreover, RAP studies will address the following:

- Identification of land use types (e.g. privately owned, pasture, forestry, treasury, others) and users affected by the Project land acquisition/need,
- Identification and assessment of Project Affected Persons (PAPs) (owners/shareholders, users of privately owned lands, formal/informal users of public lands such as treasury) that have been/will be affected by the Project-related land acquisition processes.
- Identifying gaps between national expropriation legislation and PS5 and preparing a plan to eliminate gaps.

During the preparation phase of the RAP study, following tasks was finalized:

- Preparation of questionnaires,
- Training,
- Preparation of field study materials,
- Preparation of asset inventory and Census template,

²¹ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/bergama-ilce-nufusu-izmir on 20 December 2023.

²² Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/soma-ilce-nufusu-manisa on 20 December 2023.

²³ Nufusune, 2022 Statistics on Population. Retrieved from nufusune.com/didim-ilce-nufusu-aydin on 20 December 2023.

- SPSS database preparation,

To obtain the community level information, Community Level Surveys with the headmen or local Key Informants (KIs) was conducted, while a socio-economic baseline survey was conducted with the identified PAPs in the settlements. A separate census and identification study was conducted with the headmen or KIs in the settlements to identify all affected PAPs. To complete an Asset Inventory, following information was obtained by directly contacting the PAPs identified in the settlements:

- Livelihood patterns of the Project affected households
- Household population
- Vulnerable household member
- Impacts on livelihoods
- Total land holding
- Parcel size
- Magnitude of land loss
- Fixed assets on the lands
- Compensation payments
- Deductions not in line with PS5

Following Table 5.10: shows the sampling strategy used during the RAP studies:

Table 5.10: Sampling strategy

Survey	Sampling	Implementation
Community-level surveys	Full census <i>The settlement headmen/KIs in approximately 46 settlements based on the available expropriation data</i>	Structured Community level Questionnaires (CLQs) with the headmen/KIs in all Project Affected Settlements (PASs)
Households-level surveys	Full census <i>Covering both female and male PAPs as appropriate</i>	Structured Household Level Questionnaires (HHQs) will be administered through field surveys with the sample representing the following PAP categories (covering both female and male PAPs as appropriate): Owners, formal/informal users, tenants of the affected privately-owned parcels and fixed assets, --Users of the pastures and forests, -Vulnerable persons/households with vulnerable members affected from Project-related land acquisition.

Secondary data sources for the RAP studies were:

- Public benefit and urgent expropriation decisions issued by the authorities for the Project,
- Documentation on the status of expropriation on different parcels,
- Expropriation plans for all affected parcels (in excel format),
- List of affected landowners/shareholders,

6 Official information from institutions and organizations. Potential Impacts of the Project on Project Affected People (PAPs)

The PAPs are the users of land, properties, and businesses that will be used for the implementation of the sub-projects, either permanently or temporarily, as well as those whose livelihoods are connected to the affected land or properties. They include the following categories:

- Landowners who lose all or part of their land,
- Owner of businesses affected by temporary or permanent land acquisition or who have access restrictions to land, including informal businesses,
- Employees and workers of businesses that may be affected by temporary or permanent land acquisition,
- Users grazing in the pasture areas in the construction site, especially in the Treasury lands
- Utilising the forest lands in the Project, mainly for livelihood activities (e.g. mushroom cultivation)
- Property owners who, as a result of the Project, have to be resettled,
- Property owners whose land will be needed during the construction on a temporary basis,
- Formal renters of land or property affected by land acquisition, and
- Those who are not owners or formal renters of the affected land or properties, but they either reside on or their livelihoods are directly dependent on the affected land or properties (e.g., tenants, those earning wages from working on the affected agricultural land or affected businesses or are using the land informally with or without the permission of the owner, informal businesses like street vendors).

Land requirements of the sub-projects may necessitate ownership rights or easements to be established on subject lands. Permanent land take will require ownership rights to be established while easements may be established on lands that will require temporary land take. In some cases, land on which infrastructure has been established may be handed back to the rightful owners for their use, with some limitations (such as not planting trees, not building structures etc.). Compensation will be based on the loss of value due to these restrictions, for example on restoring livelihoods. The RAPs will include methodology to determine such value loss.

6.1 Physical and Economic Displacement

In the context of IFC PS 5 and EBRD PR 5, which focus on land acquisition and involuntary resettlement, there are two key aspects: physical displacement (relocation, loss of land or shelter) and economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources or other means of livelihood).

Physical displacement refers to the physical relocation of people from their homes or land due to a development project. Identifying factors for PAPs involve assessing who will be directly affected, considering criteria such as land ownership, residence, and resource dependency. Measurements include determining the extent of displacement and its impact on individuals and

communities, while actions encompass developing a comprehensive plan that includes fair compensation, alternative housing, livelihood restoration, and access to essential services. The goal is to mitigate adverse effects and ensure a socially responsible outcome.

Ongoing additional studies are being conducted to verify whether any physical displacement is necessary. Risks are also determined for the structures located on the relevant parcel even though these residential or non-residential structures are outside the area to be expropriated/purchased. Community health and safety orientated risks such as dust, noise or traffic during the construction process are identified. In these cases, PAPs will be contacted and appropriate actions in the entitlement matrix will be applied to the mentioned structures and households.

In addition to these, economic displacement occurs when individuals or communities experience adverse changes in their livelihoods or economic activities due to a development project. Identifying factors for economically displaced persons involve assessing the disruption to income sources, employment, or business operations. Measurements include quantifying the economic losses and changes in employment patterns. Mitigation actions may include providing alternative income-generating opportunities, skills training, or support for transitioning to new economic activities. The aim is to minimize negative economic impacts and promote sustainable development for those affected by the Project.

6.1.1 General Assessment of Impacts on Livelihoods

Communities dependent on the affected land face immediate disruptions to their economic activities, leading to loss of income and livelihood insecurity. The analysis of the impacts on economic activities through land acquisition begins with a participatory approach. This means involving the affected stakeholders directly in the decision-making process. In this case, household representatives were consulted to gather their opinions and insights. The participatory approach ensures that the perspectives of those impacted by the land acquisition and land use are considered. It allows for a more comprehensive understanding of potential issues. Household representatives (specifically those engaged in agriculture) were surveyed.

Sub-projects are located in rural areas and agricultural lands will be affected, the impact goes beyond the value of the land which is taken and can include crops and other affected land-related livelihoods and assets. Thus, the local community members who lose their agricultural or grazing land may be economically affected, as their livelihood activities are reduced or completely lost. In this sense, various economic-based and livelihood-related impacts are observed in the field.

- Adverse Impact on Agricultural Activity due to Land Loss: This impact refers to the negative effects on agricultural activities caused by the loss of land. It affects directly the livelihoods of households. When land is acquired or divided, it disrupts existing agricultural practices.
- Access and Irrigation Problems: Households are concerned about access and irrigation issues due to land division. If lands are divided, it can lead to difficulties in accessing fields and managing irrigation systems.
- Irrigation System Damage: Some households worry about damage to the irrigation system. If the system is impaired, it becomes challenging to irrigate other lands effectively.
- Loss of Land Value: Households express concerns about the value of their land decreasing. Compensation measures should address this loss to ensure fair treatment.
- Product Damage from Construction Dust: Anticipation of damage to agricultural products due to construction dust. Construction activities can negatively impact crops and livestock.
- Other Concerns: A small percentage of households have additional unspecified concerns.

The Project's preliminary economic displacement strategy was to avoid economic displacement in accordance with PS5 and PR5. 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 irrigation systems,
- Avoiding agricultural access closures,
- Avoiding animal access closures.

The land acquisition and construction is ongoing processes. Only in Akköy land transaction is completed. There are identified damages²⁴ on irrigation systems for most of the sub-project social area of influence.

If the land became "unviable" after partial permanent expropriation, the remaining sections can be expropriated in accordance with the law, following the "unviable lands acquisition criteria." For the expropriation of such unviable lands, an official application from the PAPs to the Administration (Energy Market Regulatory Authority) is required.

In Akköy, there is no damage identified. However, a dust complaint was received because the excavation materials were still on the site. All outstanding complaints will be resolved by Project Company within three months in the operation phase.

6.1.1.1 Loss of Agricultural Lands

When development projects involve land acquisition and urgent expropriation, the loss of agricultural lands can have far-reaching impacts. Firstly, it disrupts the livelihoods of farmers and rural communities, leading to economic instability. Food security is also affected as reduced crop cultivation areas result in decreased food availability. Additionally, environmental degradation occurs when agricultural land is converted to non-agricultural uses. To address these challenges, robust resettlement frameworks and fair compensation, are essential.

6.1.1.2 Loss of Agricultural Crops and Trees

The loss of crops and trees resulting from land acquisition and urgent expropriation processes may have profound and multifaceted impacts. Agriculturally, it disrupts the livelihoods of communities dependent on farming, leading to immediate income loss and food insecurity. Ecologically, the removal of trees can disturb local ecosystems, affecting biodiversity and contributing to environmental degradation. Socially, it can displace communities and erode cultural ties to the land.

Additionally, the loss of mature trees hampers the ecosystem's ability to provide crucial services such as carbon sequestration and habitat preservation.

6.1.1.3 Loss of and Access Limitations to Grazing/Pasture Lands

The loss of and access limitations to grazing lands resulting from land acquisition and urgent expropriation processes for a project can significantly impact rural communities and their way of life. It directly threatens the livelihoods of those reliant on livestock for sustenance and income. Grazing lands are essential for maintaining the health and productivity of animal husbandry, and their loss can lead to a decline in animal well-being, reduced milk and meat production, and economic hardships for rural communities. Mitigating these impacts requires solid measures, including fair compensation, provision of alternative grazing areas, and engaging affected

²⁴ The detail information regarding the damages on irrigation systems for all sub-projects is given in Project-specific RAP.

communities in the decision-making process to ensure sustainable solutions that address their unique needs and maintain pasture related practices.

6.1.1.4 Forestlands and Natural Resources

The analysis of the impact on forestland involves an examination of forest usage and potential effects due to land acquisition. This includes assessing how local populations utilize the forest for various activities and their expectations regarding the impact of land acquisition on these activities:

- Some respondents may engage in commercial activities like collecting mushrooms in forests, medicinal plants, or buying wood.
- A group may use the forest for household needs.
- And a portion of the PAPs do not use the forest at all.

It is questioned whether PAPs will be affected in the context of the forest land to be utilised and how this impact can be addressed. Various options are considered, such as the opening of new forest roads from suitable compensation. Overall, the approach involves detailed assessment of forest use, anticipation of impacts and development of strategies to mitigate adverse impacts, taking into account both direct users and indirect beneficiaries of the forest.

6.1.1.5 Other Land-Based Income Generating Activities

The acquisition of land may disrupt various land-based income-generating activities, including fishing, beekeeping, and mushroom farming. These activities often rely on specific environmental conditions and land resources that may be altered or rendered inaccessible by land acquisition. For instance, fishing communities might lose access to critical water bodies due to construction or pollution, directly affecting their livelihoods and food security. Beekeepers may face the loss of foraging grounds for their bees if natural flora is cleared, leading to reduced honey production and financial instability. Similarly, mushroom farming, which often depends on specific forested areas or controlled environments, can be severely impacted if these lands are repurposed or destroyed, disrupting the delicate ecological balance required for mushroom cultivation.

However, within the scope of sub-projects, these impacts are very rare. Within the scope of beekeeping, it is noted that the routes of mobile beekeepers may change but it is not a significant problem. For mushroom picking activity, neighbourhood mukhtars stated that there are no mushroom pickers at the turbine points. Finally, for example, some of the households engaged in fishing under the Uygur WPP expressed that they may have problems in accessing water. Within the entitlement matrices prepared, actions have been defined in accordance with the restrictions to be imposed on this livelihood activity.

6.1.1.6 Impacts on Vulnerable Groups

Vulnerable populations often bear a disproportionate burden. Forced displacement can exacerbate existing socio-economic inequalities, as these groups may lack the means to easily adapt or find alternative livelihoods. The loss of ancestral lands can erode cultural identity and disrupt traditional practices, leading to increased vulnerability and social exclusion. It is crucial for any project involving land acquisition to incorporate targeted measures for the protection and empowerment of vulnerable groups, including inclusive consultation processes, culturally sensitive resettlement plans, and opportunities for meaningful participation in decision-making to ensure equitable outcomes.

The potential vulnerable groups may be interested in the sub-projects will be:

- Disabled people;

- Elderly people;
- Unemployed;
- Women headed households;
- Homebound due to chronic illness;
- Illiterate people;
- Landless/homeless;
- Students/ students with mobile education;
- Syrians under temporary protection (SuTP);
- Refugees under international protection (UIP); and
- Seasonal workers who involve agricultural labour

Special attention will be given for the identification of the vulnerable individuals who may be affected by the projects disproportionately during the preparation of Environmental and Social Impact Assessment Report, Stakeholder Engagement Plan and project specific Resettlement Action Plan.

6.2 Livelihood Restoration Strategy for Akköy WPP

Livelihood improvement actions and targets to be determined in both past and completed (Akköy WPP) and ongoing land transactions will be evaluated under the title of LRP within the scope of project specific document. The initiative will involve taking over publicly and privately owned agricultural, forest, and pasture lands, which may lead to economic displacement.

Prioritizing long-term resilience and adaptability of livelihoods for Project-Affected Settlements (PASs) and Project-Affected Households/Persons (PAHs/PAPs) aligns with international development guidelines.

The LRP scope, eligibility and actions identified in the land acquisition transactions for the Akköy WPP Project will be as follows.

- Owners and Users of Parcels Under Multiple Project Impact:
 - Some parcels may have been affected by land acquisition from another project in the past.
 - Multiple impacts are already considered in land valuation based on local legislation.
 - Landowners who want to sell these lands will have their transaction costs covered from the RRA (Rehabilitation and Resettlement Assistance) fund.
- Landless Informal Users of Impacted Public Lands:
 - Landless informal users of impacted public lands were not specifically identified.
 - People hesitated to provide information about agricultural activities on public lands.
 - The identified informal users are not completely landless; agriculture is only one aspect of their livelihood.

Livelihood Restoration Tools to be followed in the LRP of Akköy WPP for the specified PAP groups are summarised below:

- Transitional Livelihood Support (TLS):
 - Established to assist households during periods of change.
 - Amount of TLS matches the monthly net minimum wage.
 - Distributed from the RRA (Retrospective Resettlement Assessment) Fund to assist direct-PAPs affected by past land acquisition process of the Project.

- Local Employment:
 - Key mitigation strategy outlined in the ESIA (Environmental and Social Impact Assessment) of the Project.
 - Focus on providing employment opportunities to direct-PAPs and vulnerable members of PAHs directly impacted by past land acquisition.
 - Project Company committed to prioritizing hiring of local personnel during operation phase in case of a workforce need.
- Real Property Tax Support:
 - Owners of impacted lands informed about their rights by the Community Liaison Officers
 - Purchase and sale real property taxes covered by RRA fund if owners choose to buy new land.
- Trainings:
 - Aim to increase productivity of existing lands for
 - PAPs.
 - Enable farmers with partially affected lands to use remaining land more efficiently.
 - Topics include efficient resource use, productivity-enhancing techniques, sustainability practices, climate change, and alternative agricultural activities.

Training providers include Provincial Directorates of Agriculture and Forestry, General Directorate of Agricultural Reform, Regional Development Agencies, and Union of Chambers of Agriculture of Türkiye. Project Company will organize the special training activities for PAHs by contacting the institutions above according to the demands of local communities.

7 Eligibility Criteria

PAPs should be assisted in their efforts to improve their former living standards, income earning capacity, and production levels, or at least to restore them to pre-project level whereby lack of legal title does not exclude individuals from the eligibility to receive compensation and/or rehabilitation assistance. Any person who will suffer loss or damage to an asset, business, trade or loss of access to productive resources as a result of land acquisition or restrictions on land use undertaken or imposed in connection with the project will be considered eligible for compensation and/or resettlement assistance.

PAPs may be classified as the people who:

- Have formal legal rights to land or assets.
- Do not have formal legal rights to land or assets but have a claim to land or assets that is recognized or recognizable under national law.
- Have no recognizable legal right or claim to the land or assets they occupy or use.

The cut-off date for being eligible for compensation and/or resettlement assistance will be the last day during the completion of the census/inventory of assets, which represents a cut-off date for eligibility for resettlement assistance. Any new structures or additions to existing structures carried out after the cut-off date will not be considered affected, and their owners or occupants will not be eligible for compensation or supplemental assistance (unless they can demonstrate the census/inventory of assets failed to identify them as affected).

Sufficient public awareness of the cut-off date will be given to the community through the responsible agencies contracted by the Project Company, media, community elders and leaders by the implementing agency.

8 Methods of Valuing Assets

The required lands are determined based on the final plan of the Project. In line with the determination and valuation studies carried out by independent and private companies licensed by the Capital Markets Board of Türkiye (CMB), prices are determined by taking into account the agricultural characteristics of the lands to be purchased and the condition of the outbuildings (trees, crops, buildings, barns, etc.) on the lands. Calculation of unit values of such immovable properties by the companies carrying out these studies is made according to the Capitalization of Income Method Agricultural Net Income calculation.²⁵ After this process is completed, the resulting amounts are evaluated under the coordination of the Mapping and Expropriation Unit. Finally, the amount necessary to reach the full replacement cost will be added to the determined value.

Once the price evaluations within the Project Company are completed, a purchase request is opened. Parallel to this process, a “Land Acquisition Commission” is formed with the participation of the relevant staff. The commission holds disclosure meetings and compromise negotiations with the landowners about the Project, negotiates with the parties in a way that adheres to the upper limits determined within the Project Company, and final prices are determined.

The commission determines the estimated ceiling value of immovable properties in the expropriation area. During the valuation of immovable assets or resources, the valuation commission has to take into account the following valuation criteria, which is mentioned in Article 11 of the Expropriation Law:

- The nature of the immovable property or resource,
- The size of the immovable property or resource,
- All characteristics and elements, which could affect the value of the immovable property or resource, including the individual value of each element,
- Tax declaration (taxes paid on that immovable property or resource), if any,
- Previous values of property determined by official bodies at the date of expropriation,
- For lands, the net income that could be derived from the immovable asset or resource (without undertaking any changes, using the immovable property or resource in the same conditions as of the expropriation date),
- For trees, there is criteria of being a fruit orchard or not. If the trees in a land are meeting the criteria of being a fruit orchard the valuation method of that land will be valuation of the land as a fruit orchard otherwise, value of each tree will be added to the value of the land.
- For house plots, the amount for which equal (similar) house plots have been sold without any special purpose, prior to the date of expropriation,
- For structures, official unit prices (annually issued by the Ministry of Environment and Urbanization) at the expropriation date, calculations of the cost of building, and depreciation for wear and tear, and
- Any other objective criteria that could affect the value of the property or resource

²⁵ TMMOB Chamber of Agricultural Engineers, Expert Handbook, Assoc. Prof. Dr. Sadık Kırbaş, Assoc. Prof. Dr. Besim Akın, 1983, Ankara.

Valuation of Easement Rights

As a basic principle for the indemnification of temporarily acquired land, the landowner shall be compensated for the restricted access and usage rights as well as the loss of productivity and income experienced during the period of limited or restricted land usage.

During the production of expropriation plans, the area on which an easement right will be established is determined together with its coordinates, and then the plan is produced.

In areas where a permanent easement right will be established; the loss of value caused on the property by the easement (for example, due to loss of productive land) is taken as the cost of easement right. Permanent easement right is annotated to the land register and its cost is paid to the right-holder.

In areas where temporary easement right will be established; the loss of income caused on the property by the easement is taken as the cost of easement right and paid to the right-holder.

For easement rights, the procedures required under ownership rights shall be applied; however, the areas subjected to establishment of temporary and permanent easement right are restored before they are handed over to their owner.

To ensure accurate calculations, appraisers firstly visit the expropriation area, take account of its current status of use and determine all the factors (soil structure, status of use, topography, climate, proximity to settlements and roads, favourable transportation conditions, location, current pattern of rotating plants in the region and whether or not irrigated and dry agricultural activities are carried out) that may affect the value of the relevant immovable property in accordance with Article 11 of the Expropriation Law. For long term easement, the plot price determination for compensation cannot surpass 50% of value of the market price of the whole parcel in an urban area if the land were sold (35% in a rural area). This represents the top allowable price according to Turkish law. There is no change in ownership and restrictions are removed when the use of the area ends. In those exceptional cases where the market value of the land acquired for the long-term easement is higher than the 50% (or 35%) threshold for compensation, then the project will expropriate the entire parcel of land and provide full compensation to the owner for the land. During implementation, the Project Company will determine the compensation amount according to the entitlement matrix below by using the gap analysis. If there are any gaps to be found by the Project Company, measures will be taken to meet the IFC PS 5 and EBRD PR 5 standards of replacement cost. There might be individual cases where negative or severe impacts are not addressed through providing full compensation at replacement cost. In such cases, additional assistance for livelihood restoration will need to be provided to PAPs. Categories eligible for additional livelihood assistance are also covered in Table 8.1 given below provided Entitlement Matrix. An entitlement matrix will be prepared for each sub-project and appropriate actions will be defined for the groups included in the impact area of the relevant project.

Table 8.1: Project Entitlement Matrix

PAP Category	Type of losses	Entitlements	Actions/Responsibilities
Owners of the affected lands	Loss of private lands	<ul style="list-style-type: none"> ● Cash compensation at full replacement cost is paid to the right owners according to partial or entire loss of the 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.²⁶ ● A replacement land of similar agricultural/industrial/other (depending on the land category) potential. 	<ul style="list-style-type: none"> ● Compensation for lands will be paid from Expropriation Budget. ● Project company will take a role in informing the public about the issue and the Project will prepare Guide to Land Acquisition (GLAC) and distribute it to all settlements. ● In the full replacement cost, the compensation is paid, including the transaction costs necessary to purchase a new property. ● If the remaining parcel of land after expropriation of a part of it is not economically viable, it will also be acquired and compensated (at full replacement cost), if the owner so desires
Formal and informal users (owner of the crops) of the private and public lands	Loss of crops	<ul style="list-style-type: none"> ● 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 (MoAF) by updating. ● Users who will experience loss of agricultural income due to land acquisition, rather than landowners will be identified. ● 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. 	<ul style="list-style-type: none"> ● Maximum effort will be practice to avoid land take before harvest. ● The construction calendar will be shared with the mukhtars of the PASs (Project Affected Settlements) by Project Company, 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. ● 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. ● Project Company's subcontractor agreements will include compensation for harms and damages commitment and liability.

²⁶ 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).

PAP Category	Type of losses	Entitlements	Actions/Responsibilities
		<ul style="list-style-type: none"> Damages caused by construction activities to products and assets outside the construction area are compensated by sub-contractor firms. 	
Formal/informal owners of the trees on the affected lands	Losses of trees	<ul style="list-style-type: none"> Compensation of trees and other fixed assets are paid in accordance with national Land Expropriation Law and PS5 and PR5 in cash to tree owners. Outstanding full replacement value (top-up payment) will be provided from the RAP-LRP Fund. Cash compensation for affected trees at full replacement value will be provided. 	<ul style="list-style-type: none"> A CMB licenced firm valued the trees in accordance with PS5 and PR5 (at full replacement value). There are deductions non-comply with international standards. These will be paid from RAP-LRP fund at updated value.
Formal/informal owners/users of the structures on the affected lands	Losses of fixed assets	<ul style="list-style-type: none"> Compensation of fixed assets are paid in accordance with national Expropriation Law in cash to property owners. Outstanding full replacement cost / top-up payment will be provided from the RAP-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. Deteriorated irrigation systems will be fixed or construction will be assisted. A possibility of in-kind compensation (e.g. replacement house/ other in-kind resettlement package). 	<ul style="list-style-type: none"> Compensation for lands in which expropriation process will be paid from Expropriation Budget. However, full replacement cost that the legal legislation does not cover (top-up payment) will be provided from RAP-LRP Fund in updated value. Relocation allowance and disturbance allowance will be provided Project Company will ensure that the GM (Grievance Mechanism) is always open for those seeking access to their entitlements in this RAP during construction. Project company is responsible for providing entitlements of formal and informal Project Affected Households (PAHs) and Regional Unit of Project company will play a role in facilitating PAPs access to their entitlements.
Beneficiaries of the affected private grazing areas	Loss of common property areas and access	<ul style="list-style-type: none"> Access to pastures and private grazing lands will be provided. If access for animal husbandry activities cannot be provided during the construction period, land users whose livelihood is dependent on livestock will be provided with feed support. 	<ul style="list-style-type: none"> Technical and feasible measures will be explored to provide access to pasture/grazing areas, and proper passages will be provided to restore access after construction by Project company. If road access could not be provided, feed support will be provided from RAP-LRP Fund. This support can be provided in the form of direct provision and distribution

PAP Category	Type of losses	Entitlements	Actions/Responsibilities
		<ul style="list-style-type: none"> If the access to pasture/grazing areas is provided through passage gaps; there is no need to compensate the animal owners if the passage to the lands is open and safe for human and animal health. However, if the partial transition is far from traditional use and it poses a danger to human and animal health, the feed support specified in the previous bullet should be provided partially. 	<ul style="list-style-type: none"> of fodder in cooperation with cooperatives and related institutions. Project Company will ensure that the GM is always open for those seeking access to their entitlements in this RAP during construction. Project company is responsible for providing entitlements of PAHs and Regional Unit of Project company will play a role in facilitating PAPs access to their entitlements.
Beneficiaries of the affected forestlands	Loss of common property areas and access	<ul style="list-style-type: none"> Access to forestlands will be provided. If access for benefiting activities cannot be provided during the construction period, land users whose livelihood is dependent on forestry and benefiting from natural resources will be provided with product payment. If the access to forestlands is provided through passage gaps; there is no need to compensate the beneficiary PAPs if the passage to forests is open and safe for human. However, if the partial transition is far from traditional use and it poses a danger to human health and safety, the product payment will be provided for days of access barrier. 	<ul style="list-style-type: none"> Technical and feasible measures will be explored to provide access to forestlands, and proper passages will be provided to restore access after construction by Project company. If road access could not be provided, product payment will be provided from RAP-LRP Fund. Project company will ensure that the GM is always open for those seeking access to their entitlements in this RAP during construction. Project company is responsible for providing entitlements of PAHs and Regional Unit of Project company will play a role in facilitating PAPs access to their entitlements.
Legal Renters & Illegal Renters	Loss of rental areas	<ul style="list-style-type: none"> Assistance with finding a new place and moving and transition allowance. If the lease is terminated early, compensation to ensure that renters do not suffer losses. Temporary Tenant Support / Interim Renter Support will be provided to the relevant PAPs in accordance with the assessment studies. 	<ul style="list-style-type: none"> Project Company will provide guidance on finding a new place to live, share resources, and offer support during the transition. Also, it will be ensured that the renter receives compensation for eligible expenses related to early termination. Landlord or property management will be informed as soon as the decision to terminate early is made by the Project Company.

PAP Category	Type of losses	Entitlements	Actions/Responsibilities
		<ul style="list-style-type: none"> Tenants, informal users and persons without recognisable claims are not entitled to expropriation compensation in law. However for the informal renters, all basic costs related to the relocation of the informal tenant will be covered by the Project Company within the RAP Fund. 	<ul style="list-style-type: none"> In line with the assessment studies, the Project Company will provide Temporary Tenant Support to the relevant PAPs and will keep the grievance mechanism open for the specified period (average six months or entire construction phase).
Owners/Users of the land which will be subjected to easement	Loss of land for the establishment of easement rights	<ul style="list-style-type: none"> Easement value for permanent and temporary easement right determined by the Company in accordance with criteria specified by law, considering the decrease of the total land value as a consequence of the installation and relevant land use restrictions Loss of future land productivity for the construction period considered during determination of easement value and included in the payment for the easement to the landowner 	<ul style="list-style-type: none"> A thorough assessment will be conducted of the easement's impact on land value and productivity. The losses and damages will be assessed by independent expert from the Provincial Directorate of Agriculture and Forestry, contracted, verified and funded by the Project Company
Employees or workers on the land or businesses	Disruption in economic activity	<ul style="list-style-type: none"> Compensated for their income earned from the land, crops, and any investments made on the land in a manner that they will be the same or better off than before the Project. For employees and workers additional allowance (depending on the case, income restoration assistance package such as equivalent of 6 months of minimum wage or a job opportunity or other social support mechanisms facilitated by the Project Company and/ or other institutions) will be paid. 	<ul style="list-style-type: none"> The income loss for landowners, employees, and workers will be evaluated and tailored compensation packages based on individual circumstances will be provided. LRP will be presented in the prepared RAP and actions will be given for these economic based impacts. Project company will ensure that the GM is always open for those seeking access to their entitlements in this RAP during construction.
Affected settlements (PASs)	Impacts on access roads and services commonly use	<ul style="list-style-type: none"> The current infrastructure, roads and services will be protected and regulated so as not to bring economic losses to its users. 	<ul style="list-style-type: none"> Infrastructure and roads damaged in past construction activities will be repaired by Project company.

PAP Category	Type of losses	Entitlements	Actions/Responsibilities
		<ul style="list-style-type: none"> ● Technical and feasible measures will be explored to provide access to lands, and proper passages will be provided to restore access after construction. 	<ul style="list-style-type: none"> ● Project company will ensure that the GM is always open for those seeking access to their entitlements in this RAP during construction.
Vulnerable PAPs	Being more affected by the Project due to available vulnerability	<ul style="list-style-type: none"> ● Vulnerability assistance will be provided, including various types of service support. ● Stakeholder engagement channels will be open for vulnerable PAPs and 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. 	<ul style="list-style-type: none"> ● Vulnerability Assistance (VA) will be provided by Project company. ● Project company is responsible for providing entitlements of formal and informal PAHs and Regional Unit of Project company will play a role in facilitating PAPs including vulnerable PAPs access to their entitlements. ● CLOs will organize activities for vulnerable groups and women have access to stakeholder engagement opportunities.
Impacts of ETLs	Economic displacement	<ul style="list-style-type: none"> ● The Energy Transmission Lines design phase is not yet completed. However, the approximate areas where the lines will be installed are known. The lines may pass through both public and private lands. ● Permanent expropriation will take place at the pole locations, and compensation will be provided at full replacement cost. All entitlements under the entitlement matrix, LRP, and VA will apply to the impacts on livelihoods. ● Permanent easement rights will be established for the areas under the wires, and PAPs will be able to continue both their livestock and agricultural activities. 	<ul style="list-style-type: none"> ● Necessary additional payments will be provided by Project Company from the RAP-LRP fund. ● Project company will ensure that the GM is always open for those seeking access to their entitlements in this RAP during construction. ● Project company is responsible for providing entitlements of formal and informal PAHs and Regional Unit of Project company will play a role in facilitating PAPs access to their entitlements.

In addition to the national legal requirements, the Project Company will follow the Entitlement Matrix above which details the entitlements in accordance with the IFC PS 5 and EBRD PR 5.

9 Organizational Procedures & Implementation Process

The Project Company will take into account some situations in the processes to be carried out for implementations of the Project-specific RAP. Before financing the sub-projects, the Project Company will make sure that the social safeguards issues are identified, the processes spelled out in this framework are followed, and in the cases when there will be a need for land acquisition or resettlement, a RAP is prepared in accordance with this framework, submitted to the Lender for review and clearance and disclosed. The Project Company’s role includes building capacity to implement the RF; ensuring the necessary conditions either preparing RAP according to the RF; and regular monitoring of the RAPs, and reporting to the Lenders, using the reporting format attached to this RF (Appendices Section A.1).

The Land Acquisition Committee of the Project Company, which is formed with the participation of the Surveyor, Procurement Officer, Project Manager/Operational/Power Plant Manager and/or such persons as they deem appropriate, and which follows the valuation process, will be referred to at the necessary points to be consulted during the follow-up phase of the items in the RAP.

Finally, the Project Company will ensure that, to the extent possible, sub-projects, which involve land acquisition or resettlement, are avoided. In other words, land acquisition is kept to a minimum level based on the technical requirements within this framework document.

During the implementation of the project, when land acquisition or resettlement is necessary, the Project Company will inform the Lenders of the need to carry out an expropriation or resettlement process for the proposed sub-investments.

The roles and responsibilities required in the RAP-LRP implementation are presented in Table 9.1. While general project management is common to nine WPP project package, regional tasks are specific to the subprojects.

Table 9.1: Roles and Responsibilities for RAP Implementation

Level/Unit	Roles	Responsible
General Project Management		
Health and Safety (HS) Manager	<ul style="list-style-type: none"> Work in coordination with Corporate Social Relations Mentor and HR Manager to review internal and external 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 by HS Site Chiefs of nine WPP project package. Report to the Senior Project Management Team on Project's HS Performance and key HS issues, including RAP-LRP, ESMP and SEP implementations of nine WPP project package. 	Project Company Central Unit
Corporate Social Relations Mentor	<ul style="list-style-type: none"> Oversee compliance of nine WPP Projects' social performance (including implementation of measures/actions related to SEP, GM, RAP) with Project Standards. Prepare social management/action plan updates and training documents on the implementation of the SEP and grievance mechanism as part of Project ESMS. 	Project Company Central Unit

Level/Unit	Roles	Responsible
	<ul style="list-style-type: none"> Work in coordination with HS Manager, HR Manager and other relevant manager/directors to review external grievances and ensure/verify that the site teams address the external grievances/corrective actions in responsive timeframes in accordance with the Project SEP. Evaluate the capacity of the site social teams/officers for RAP implementation. Ensure effective and periodic communication with the internal and external stakeholders. Review resettlement and loss of income related public grievances and ensure/verify that the site teams address the public grievances/corrective actions in responsive timeframes. Ensure the LRP and Vulnerability Assistance implementations in nine WPP project package. 	
Surveying and Land Acquisition Mentor & Corporate Social Relations Mentor	<ul style="list-style-type: none"> Ensure fulfilment of all applicable national legislative and permitting requirements in nine WPP project package. To ensure the implementation of RAP-LRP with regional teams of nine WPP Projects. Provide reaching rights holders and providing their entitlements in nine WPP project package. Ensure the LRP and Vulnerability Assistance implementations. 	Project Company Central Unit
Director of Infrastructure and Superstructure Works	<ul style="list-style-type: none"> Ensure fulfilment of all applicable national legislative and permitting requirements in the Project. Ensure adequate resources are allocated for the implementation of the Project RAP-LRP during the construction phase. Ensuring that RAP requirements are met before civil works for nine WPP project package. 	Project Company Central Unit
Director of Technical Affairs	<ul style="list-style-type: none"> Ensure fulfilment of all applicable national legislative and permitting requirements in the Project. Ensure incorporation of the RAP-LRP, ESMP and SEP requirements to the contracts/agreements made with the subcontractors and vendors. 	Project Company Central Unit
Director of Financial and Administrative Affairs	<ul style="list-style-type: none"> Ensure required financial allocations are in place for effective implementation of RAP-LRP. 	Project Company Central Unit
Regional Project Management (E&S Positions)		
HS Chief	<ul style="list-style-type: none"> Work in coordination with CLOs to review internal and external grievances and implement required corrective actions, if any, in responsive timeframes in accordance with the Project SEP and with approval from HS Manager. Report to the HS Manager on Project's HS Performance and key HS issues, including RAP-LRP, ESMP and SEP implementation. 	Project Company Regional Unit
Community Liaison Officers (CLOs)	<ul style="list-style-type: none"> Ensure compliance of Project's social performance (including implementation of measures/actions related to ESMP, SEP, GM, RAP-LRP) with Project Standards. Ensure effective and periodic communication with the external stakeholders during the construction phase. Ensure all Project personnel (direct and contracted) receives trainings on the implementation of the internal and external grievance mechanism developed for the Project (e.g., how to submit internal grievances, how to manage external grievances, etc.) at the time of employment. Support related specialists and Corporate Social Relations Mentor in the implementation of RAP-LRP. Management of internal grievances as required. 	Project Company Regional Unit

Level/Unit	Roles	Responsible
Subcontractors		
Subcontractors	<ul style="list-style-type: none"> Ensure compliance with the Project-specific E&S policies, E&S management plans and Project Standards, including RAP-LRP, ESMP and SEP in line with their contractual requirements. Ensure competent and trained HS staff is allocated to implement SEP and to manage GM. 	Subcontractor firm

Since the exact dates of the Project have not been finalized yet, the tentative staged-based timeline is presented below:

Table 9.2: RAP-LRP Implementation Schedule

Implementation Topics	Stage
Asset Inventory and Census preparation (including formal-informal users and vulnerable PAPs)	Prepared during RAP preparation. The dates of census and inventory conducted within the scope of the prepared project specific RAPs are indicated.
Disclosure of the RAP	After last draft of RAP
Announcement of the eligibility and the entitlements to PAPs household-based	Before civil works
Compensations according to national legislation	Before civil works
Compensations according to international requirements	Before civil works
Mobilization of the contractor and the subcontractors	After compensations
Land entry protocols for the temporary affected lands	Before construction
CLO activities, negotiations with PAPs and the operation of the GM	During the Project
Community level supports	During the Project
Compensations harms and damages	During the Project
Monitoring and Evaluation (M&E)	During the Project, periodically

10 Stakeholder Engagement and Consultation

One of the key steps on the basis of the Lenders' requirements and standards on resettlement, land acquisition and compensation is the implementation of a framework for stakeholder engagement, consultation, participation, and the establishment of a process to redress the grievances of the PAPs.

The RF will be officially disclosed on the website of the Project Company in both English and Turkish. The documents determined to be included the ESIA disclosure package should be disclosed before construction begins on the Project affected lands.

In the public participation meetings of each sub-project, the RF will be included in the ESIA disclosure packages²⁷ of the sub-projects, which have been prepared in line with the Lenders' requirements and national legislation, and disclosed to the Project stakeholders including the PAPs affected from the land acquisition and expropriation activities of the Project.

The Project Company will assign six Community Liaison Officers (CLOs) for the Project (two CLOs will be employed for more than one sub-projects). The CLOs will be in close contact with the representatives of the PAPs as well as the PAPs individually, as needed. The representatives will be chosen by the impacted community in a participatory, accessible, and transparent manner. The CLOs will also be accessible to the PAPs and their contact numbers will be provided to the PAPs.

The CLOs will arrange stakeholder engagement and consultation meetings during the implementation of the RF in a place and time which is accessible to the PAPs and will be in communication with them in advance, depending on a given situation.

The CLOs may need to reach out to certain vulnerable groups or persons in a tailored manner to ensure their participation.

During the preparation of the RAPs, consultations will be held with the PAPs to discuss the RF as well as the draft RAP to ensure participation in the Project and that everyone's opinions are taken into account. Consultation and participation will be held in an accessible and meaningful manner. RF and/or RAPs will be disclosed before meetings for the PAPs to view and discuss. The Project Company and its representatives will respond to the PAPs' questions in the consultation meetings. Consultation meetings, attendees and issues raised will be documented. A Project-specific consultation log, which is given in Appendices Section A.3, will be used in order to record all stakeholder engagement and consultation activities.

Key stakeholder groups are listed below:

- Ministry of Energy and Natural Resources
 - Energy Market Regulatory Authority (EMRA)
 - Turkish Electricity Transmission Company (TEIAS)
- Ministry of Agriculture and Forestry (MoAF)

²⁷ A disclosure package of the Project that includes the Final Draft ESIA Report together with the SEP, Non-Technical Summary (NTS), Resettlement Framework (RF), Framework Biodiversity Action Plan (BAP), and stand-alone Critical Habitat Assessment (CHA). Summaries of the Climate Change Risk Assessment (CCRA) and Human Rights Impact Assessment (HRIA) that are conducted within the scope of the Project will be covered as part of NTS.

- Ministry of Environment, Urbanization and Climate Change (MoEUCC)
- Governorships of the Project Provinces
- Municipalities of the Project Provinces
- Mukhtars of the Project affected settlements
- Residents of the Project affected settlements
- People who lose their lands, assets and livelihood sources
- Vulnerable/disadvantaged groups

Prior to appraisal of the Project, the Project Company will inform the PAPs and other relevant stakeholders through dissemination of the RF online and through conducting public consultations as described in this RF. Dissemination activities will be implemented through well-targeted mechanisms listed below but not limited to:

- Online channels (i.e., Project Company's website) where the Project information and its outcomes are displayed,
- Printed ESIA documents (i.e., Project information document) to be disclosed in the Project affected settlements, and
- Informative stakeholder engagement meetings that will provide timely, relevant, and life-enhancing information about the works to be carried out within the scope of the Project and address land acquisition risks while specifying vulnerabilities if any.

11 Grievance Mechanism & Right for Litigation

Under the Turkish Expropriation Law No. 2942, the landowner can file an annulment lawsuit at administrative jurisdiction and correction lawsuit against mistakes of fact at jurisdiction within 30 days of the official announcement of intent to expropriate. After failure or refusal to negotiate and at the conclusion of a court settlement, the owner can appeal the compensation level stated in the judgment at the Supreme Court of Appeals.

Moreover, the Project Company is required to establish an effective and accessible grievance mechanism as a part of the stakeholder engagement, information disclosure and consultation to comply with the Lenders' requirements and standards (particularly IFC PS1, EBRD PR10, EP IV Principles 5 and 6, and DFC ESPPs 3 and 5) and to reduce the cases of litigation. The aim of the grievance mechanism is to provide channels that are free of manipulation, coercion and intimidation in which PAPs can report their requests, concerns and grievances regarding the Project and its impacts including resettlement, land acquisition and expropriation activities.

Responding to grievances and resolving them in a timely, proactively, unbiased, effective and efficient manner is essential according to the international standards and requirements on stakeholder engagement. Specifically, it provides a transparent and credible process for fair and sustainable outcomes. By this way, trust and cooperation could be mutually developed among the Project stakeholders and the Project Company through corrective actions. Main components of a successful grievance mechanism also include anonymity, confidentiality and transparency principles. Grievance channels both online and offline will be enabled to receive anonymous applications.

According to the documents provided by the Project Company, there is an existing grievance mechanism in place for the Project stakeholders. Project Company has a grievance register form used for registration of the grievance. The form is saved within the software system of the Project Company, which is used for documentation and workflow management. Sample of the grievance register form is presented in Appendices Section A.4.

The Project Company will establish a formalized and written Project Grievance Mechanism Procedure that involves the principles of the mechanism (including anonymity), available channels with contact details of the CLO, defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution, sample subjects that describes the type of grievance as per the identified Project impacts (including land acquisition and expropriation), and management and resolution process together with the assigned responsible Project staff.

Grievances are categorized as external and internal depending on the type of the stakeholder. For the resettlement-related grievances, external grievance mechanism, which is defined in detail below, will be utilized.

The steps listed below summarize the external grievance mechanism process:

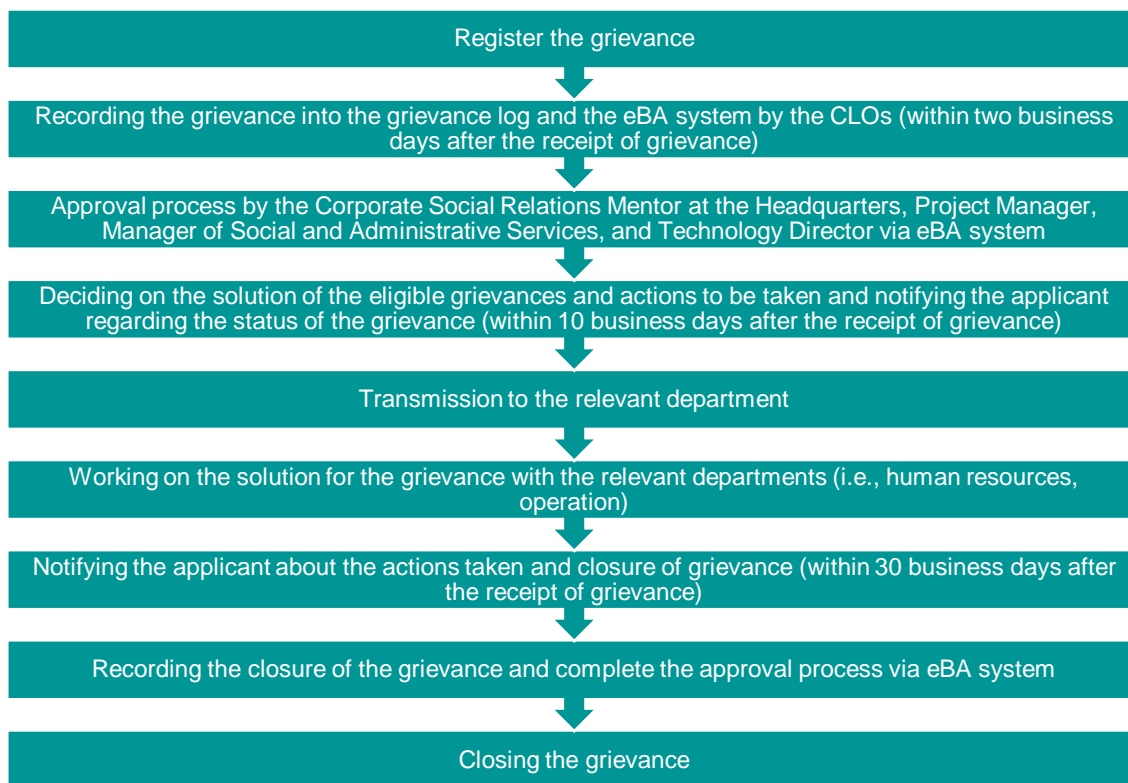


Figure 11.1: Steps of the External Grievance Mechanism Process

PAPs can use the grievance mechanism through the following channels:

- Verbal statements during face-to-face meetings/visits
- Phone calls and/or online messages (i.e., via WhatsApp) to the Project Company/CLOs
- Posters that are hung in common areas of the Project affected neighbourhoods, indicating what the clear communication channels are
- Official letter and/or petition to;
 - The Head Office (Barbaros Mah, My Office İş Merkezi, Çiğdem Sok. No:1/16 34746 Ataşehir/İstanbul), or
 - The Project Administration Offices
- The corporate e-mail address: kurumsal@enerjisauretim.com
- Project e-mail address: yekares2@enerjisauretim.com
- Online grievance forms available in Project website (for anonymous grievances): <https://yekares2.enerjisauretim.com>

All received grievances will be kept in a central grievance log by the CLO. Sample grievance log to be utilized by the Project Company throughout the Project is provided in Appendices Section A.5.

12 Budget

The land acquisition and resettlement process for the investments will be carried out by the Project Company ensuring that the process followed is in line with relevant Turkish laws and IFC and EBRD standards. When the process is out of compliance, the Project Company will be reporting to the Lenders regularly on progress made.

The Project Company will finance the land acquisition and resettlement from their own sources of financing.

13 Monitoring and Evaluation

The purpose of monitoring will be to verify that:

- Actions and commitments described in the RAP are implemented fully and on time
- Livelihood measures are in place, and they are being implemented to the satisfaction of the PAPs
- Eligible PAPs receive their full compensation entitlements within agreed timeframes
- Complaints and grievances lodged by the PAPs are followed up and that where necessary, appropriate corrective actions are implemented

Primary monitoring responsibility will rest with the Project Company. For monitoring, prepared RAPs will be inserted above-mentioned bullets into the reporting formats and these reports will be submitted to the Lenders by the Project Company. The Project company has the responsibility to ensure that project implementation is fully consistent with the RF and also to provide for adequate monitoring and reporting of the activities set out in the RAP.

In addition to the quarterly monitoring reports which are as part of ESMS, the Project Company, will also carry out its own due diligence and supervision monitoring on the processes of land acquisition and resettlement, noting when the process is out of compliance, and reporting to the Lenders on progress made every six months in accordance with the reporting format in Appendices 2. The Reporting Format in Appendices 2 will also be used by the Project Company on RAP progress.

In addition, the Lenders will also review the processes in their regular monitoring periods, and if needed, recommend mitigation measures to resolve any outstanding issues.

A. Appendices

A.1 Outline for Resettlement Action Plan

1. Description of Project and Potential Impacts
2. Objective and Rationale for Preparing RAP
3. Legal Framework
4. Survey of Affected Persons and Assets (baseline census, asset inventory and socioeconomic survey information)
5. Valuation, Compensation (specific compensation rates and standards)
6. Policy entitlements related to any additional impacts identified through the census or survey, Entitlement Matrix
7. Description of Resettlement Sites and Programs for Improvement or Restoration of livelihoods and Standards of Living, (including Resettlement Implementation Plan –RIP- and Income Restoration Plan – IRP-) – description of resettlement sites can be explained only should there be any physical displacement, otherwise the document will discuss livelihood restoration strategy if need be for economic displacement
8. Implementation Schedule for Resettlement Activities
9. Public Consultation and Disclosure Activities for RAP
10. Institutional Responsibility of Implementation
11. Procedures for Grievance Redress
12. Monitoring and Implementation
13. Timetable and Budget with Detailed Cost Estimate

A.2 Progress Reporting Format

RP Progress Report

The cover of the Report should include date of preparation and the reporting period as (month) to (month) 20XX

Sub-project Description

Brief description / overview of the sub-project, including: any associated or linked facilities needed for its functionality and success, including those linked facilities financed by other sources; key components; reports should up-date any changes or variations in design which may change land access requirements. (This section remains relatively unchanged in the reports unless there is change in design).

Implementation Summary

The summary of all tasks and activities undertaken up to date on land acquisition and/or resettlement should be provided. Progress on issues such as negotiations for land, court cases, compensation payments, community engagement, site selection, physical relocation, livelihood restoration and grievances should be explained.

Emerging Issues and Recommendations

This section should describe the key issues and report on its state of resolution / non-resolution.

Follow-up on Previous Recommendations

This section will not exist for the first report as it will not have any follow up requirements from a previous period. As of the second report this section will provide information on key issues brought up in the previous report and measures taken to mitigate them. Any unresolved issue will once again be pointed out in this section.

Conclusion

General progress of RAP implementation will be evaluated and future actions in line with the recommendations will be discussed in this section.

Summary Tables for RP Implementation

In line with its monitoring indicators set out in the RP, this section will provide through several tables, both period specific and accumulated information on RP implementation. The tables can be provided separately in an excel worksheet or directly under this section depending on the content of information presented. (An excel sheet with several tables have been provided as reference and can be adapted as necessary to each sub-project.)

A.3 Sample Project Consultation Log

No	Date	Engagement Channel (i.e., phone call, face-to-face, consultation)	Authorized Person Conducting the Activity (i.e., CLO, Project Company representatives)	The Subject of the Engagement/Consultation Activity (i.e., current Project status, information disclosure, regular visit)	Type and Name of the Stakeholder Engaged (Community/Public, Mukhtar, etc.)	Number of Stakeholders Engaged	Meeting Place and Time	Notes from the Activity (i.e., employment requests, road safety grievances)	Comments/Feedback of the Authorized Person (i.e., CLO, Project Company representatives) after the Engagement
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									

A.4 Project Grievance Form

A. General Information	
Project Name	
Name of the Recorder	
Form Registry No	
Date of Register	
Place of Register	<input type="checkbox"/> Project office <input type="checkbox"/> Other: Please specify the location
B. Means of Receiving Grievance	
<input type="checkbox"/> Telephone <input type="checkbox"/> Petition (Please attach one copy to this form)	<input type="checkbox"/> Face-to-face meetings (site visits) <input type="checkbox"/> Community meetings (Public Information Meetings etc.) <input type="checkbox"/> E-mail <input type="checkbox"/> Other: Please specify
C.1. Information about the Applicant (Please do not fill for anonymous applications)	C.2. Stakeholder Category
Name	<input type="checkbox"/> Local governmental authorities <input type="checkbox"/> Local residents <input type="checkbox"/> Non-governmental organization <input type="checkbox"/> Project Employees <input type="checkbox"/> Workers of contractors/subcontractors <input type="checkbox"/> Consultant <input type="checkbox"/> Media <input type="checkbox"/> Other: Please specify
Gender	
Contact Information	
Address	
Neighbourhood/ District/ Province	
Phone number: E-mail address:	
D.1. Information about Grievance	D.2. Grievance Category
	<input type="checkbox"/> Damage to land/crop/structure <input type="checkbox"/> Damage to access roads <input type="checkbox"/> Environmental impacts (pollution, dust, noise) <input type="checkbox"/> Use of lands without owner's consent and legal permission <input type="checkbox"/> Restricting access to natural resources/lands <input type="checkbox"/> Payment of usage fee or compensation <input type="checkbox"/> Expropriation <input type="checkbox"/> Resettlement <input type="checkbox"/> Demand for job or work from local <input type="checkbox"/> Working conditions <input type="checkbox"/> Laying off <input type="checkbox"/> Non-payments of workers' wages <input type="checkbox"/> Debt to local suppliers or subcontractors <input type="checkbox"/> Demanding any supports on education <input type="checkbox"/> Demanding any supports for households/individuals <input type="checkbox"/> Demanding any supports for neighbourhood/community <input type="checkbox"/> Demanding any supports for local authorities <input type="checkbox"/> Other: Please specify
E. Actions Recommended	

A.5 Sample Project Grievance Log

Registration number	Date of receipt and registration	How is the grievance received? (via Grievance Form, community meeting, telephone etc.)	Name of the responsible staff receiving grievance	Information about the applicant (Leave blank if application is anonymous)				Grievance category	Description of the grievance	Priority of the grievance (High, Medium, Low)	Due date of the addressing the grievance	Responsible person/ department for follow-up	Grievance status (open, closed, pending)	Action planned	Date of action taken	Supporting documents for grievance close out and resolution
				Name and surname	Gender	Telephone and/or e-mail	District									

