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ÇINAR
ENGINEERING
CONSULTANCY INC.



**DİVRİĞİ-KARS-GEORGIA BORDER RAILWAY LINE REHABILITATION
AND MODERNIZATION PROJECT
STAKEHOLDER ENGAGEMENT PLAN
CNR-ETMIC-SEP-001
(Final)**

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 2 / 64



Bağlıca Mah. Çambayırı Cad. Çınar Plaza No:66/5 06790 Etimesgut/ ANKARA

Tel: +90 312 472 38 39 Fax: +90 312 472 39 33

Web: cinarmuhendislik.com

E-mail: cinar@cinarmuhendislik.com

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STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 3 / 64

Project Owner	T. C. Ministry of Transport and Infrastructure Directorate General of Infrastructure Investments
Address	Hakkı Turaylıç Cad. No: 5 06338 Emek/Çankaya/ANKARA
Telephone and Fax Numbers	+90 (312) 203 10 00
Project Title	Divriği-Kars-Georgia Border Railway Line Rehabilitation and Modernization Project
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Consultant	Çınar Engineering Consultancy Inc.
Address	Bağlıca Mah. Çambayırı Cad. Çınar Plaza No: 66/5 06790 Etimesgut / ANKARA
Telephone and Fax Numbers	Phone: +90 (312) 472 38 39 Fax: +90 (312) 472 39 33
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TABLE OF CONTENTS

TABLE OF CONTENTS	4
LIST OF TABLES	6
LIST OF FIGURES	6
ABBREVIATIONS & ACRONYMS	7
LIST OF APPENDICES	8
1 INTRODUCTION	9
1.1 Project Overview.....	9
1.2 Scope and Objectives of SEP	10
2 REGULATIONS AND REQUIREMENTS	12
2.1 Turkish Requirements	12
2.2 World Bank Requirements.....	12
3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	13
4 STAKEHOLDER IDENTIFICATION AND ANALYSIS	16
4.1 Social Impact Area.....	16
4.2 Identification of Stakeholders	16
4.3 4.3Disadvantaged/Vulnerable Individuals or Groups (DVIG)Disadvantaged/Vulnerable Individuals or Groups (DVIG).....	25
4.4 Summary of Stakeholder Interest in and Influence Over the Project.....	26
5 STAKEHOLDER ENGAGEMENT PROGRAM	27
5.1 Purpose and Timing of Stakeholder Engagement Program.....	27
5.2 Proposed Strategy for Information Disclosure.....	30
5.3 Proposed Strategy for Consultation	30
5.4 Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups	32
6 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES	33
6.1 Implementation Arrangements	33
6.2 Roles and Responsibilities	33
7 GRIEVANCE REDRESS MECHANISM	35
7.1 Purpose and Scope	35
7.2 Roles and Responsibilities	35
7.3 Principles of Grievance Mechanism	35
7.3.1 Workers Grievance Mechanism	36
7.4 GM contact information	43
8 MONITORING AND REPORTING	44
8.1 Monitoring Reports in the Course of the Project	44
8.2 Involvement of Stakeholders in Monitoring Activities	44
8.3 Reporting Back to Stakeholder Groups	47

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 5 / 64

APPENDIX-1 REGISTRATION FORM 48
APPENDIX-2 CLOSEOUT FORM 49
APPENDIX-3: WORLD BANK STANDARDS AND KEY GAPS WITH THE NATIONAL FRAMEWORK 50
APPENDIX-4: LIST OF STAKEHOLDER 53

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 6 / 64

LIST OF TABLES

Table 1. Information about the Stakeholder Participation Meetings.....	14
Table 2. Employee Information by Stations.....	16
Table 3. Settlements around the Stations	18
Table 4. Settlements around the railway line	20
Table 5. Summary list of OIPs.....	23
Table 6. Summary list of PAPs.....	24
Table 7. Stakeholder Engagement Plan.....	28
Table 8. Roles and Responsibilities	33
Table 9. Monitoring Plan.....	45

LIST OF FIGURES

Figure 1. Stakeholder Participation Meeting in Kars Train Station.....	14
Figure 2. Stakeholder Participation Meeting in Erzurum Train Station	15
Figure 3. Stakeholder Participation Meeting in Erzincan Train Station.....	15
Figure 4: Grievance Redress Service	42

ABBREVIATIONS & ACRONYMS

AIIB	Asian Infrastructure and Investment Bank
AYGM	Directorate General of Infrastructure Investments
BMP	Biodiversity Management Plan
BTK	Baku Tbilisi Kars
CHMP	Cultural Heritage Management Plan
CHSMP	Community Health and Safety Management Plan
ÇİMER	Presidency's Communication Center
CLO	Community Liaison Officer
DVIG	Disadvantaged/Vulnerable Individuals or Groups
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
ETMIC	Eastern Türkiye Middle Corridor Railway Development Project
GBVH	Gender-Based Violence and Harassment
GM	Grievance Mechanism
GRC	Grievance Redressal Committee
IsDB	Islamic Development Bank
km	kilometer
KPI	Key Performance Indicator
LMP	Labor Management Procedure
MoTI	Republic of Türkiye Ministry of Transport and Infrastructure
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OIP	Other Interested Parties
PAP	Project Affected Parties
PIU	Project Implementation Unit
PPWMP	Pollution Prevention and Waste Management Plan
PR	Public Relation
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan
WB	World Bank
YİMER	Foreigners Communication Center

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 8 / 64

LIST OF APPENDICES

Appendix-1 Registration Form
Appendix-2 Closeout Form
Appendix-3: World Bank Standards and Key Gaps with the National Framework
Appendix-4: List of Stakeholder
Appendix-5: Documents of the Stakeholder Participation Meetings

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 9 / 64

1 INTRODUCTION

Engaging with stakeholders forms the foundation for cultivating robust, positive, and responsive relationships crucial to effectively managing the environmental and social impacts of the project. The goal of stakeholder engagement is to disclose and consult with stakeholders about the environmental and social risks and impacts of the project and to establish and sustain positive connections with diverse external stakeholders throughout the project's lifecycle. Initiating the engagement process early on ensures timely public access to pertinent information, allowing stakeholders to participate in project design and impact assessment.

The Stakeholder Engagement Plan (SEP) will consistently facilitate communication between the Investor and various stakeholders. Regular sharing of project details, environmental and social risks, mitigation strategies, and the grievance mechanism will occur. The SEP will involve identifying stakeholders to be engaged during land preparation, construction, and operation phases, along with specifying communication tools, the grievance mechanism, and responsible parties. Recognizing that stakeholder engagement is an ongoing process, it is crucially updated and integrated into the Environmental and Social Impact Assessment (ESIA) Report.

1.1 Project Overview

The Eastern Türkiye Middle Corridor Railway Development Project (ETMIC) aims to improve logistics efficiency along the Divriği-Kars-Georgia border railway line and to enhance the operational resilience of Türkiye's national railway network.

The project, financed by World Bank (WB), Asian Infrastructure Investment Bank (AIIB) and Islamic Development Bank (IsDB) is developed around two main components:

Component 1 – Rehabilitation and Modernization of the Divriği-Kars-Georgia Border Railway Line and Component 2 – Project Management.

Component 1: Rehabilitation and Modernization of the Divriği-Kars-Georgia Border Railway Line

This component aims to rehabilitate and modernize the existing 667 km railway line between Divriği and the Türkiye-Georgia border. It includes comprehensive design and construction works to renew railway infrastructure and superstructure, electrifying the line, and installing advanced signaling systems compliant with EU standards. The project will significantly enhance the line's cargo capacity, increasing it from 750,000 tons per year to 20 million tons per year, while improving resilience to climate hazards through updated engineering standards and the integration of a Distributed Acoustic Sensing (DAS) early-warning system.

Sub-component 1.1: Design, Infrastructure and Superstructure Works

The major portion of the budget will be allocated to detailed engineering design and extensive civil works. This includes the renewal of 143 km of railway, electrification of the entire line, installation of a European Train Control System, and construction of new sidings and extension of existing ones. Additional improvements include tunnel clearance and drainage works, construction of bridges and controlled level crossings, and station renovations. These enhancements will not only increase capacity and speed but also significantly reduce GHG emissions by transitioning from diesel to electric trains.

Sub-component 1.2: Design Supervision and Construction Supervision Services

This sub-component comprises supervision services, ensuring high-quality implementation of the design and construction works. It includes oversight of the procurement process and the supervision of the entire project execution to guarantee robust construction standards and adherence to resilience measures against climate and

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 10 / 64

natural hazards. This component will enhance the project's overall efficiency and effectiveness, ultimately delivering a modernized, higher-capacity railway line that meets international standards and supports Türkiye's strategic logistics and environmental goals.

Component 2: Project Management

This component focuses on the mobilization of a specialized firm to manage the project. It covers various aspects such as construction, engineering, social and environmental monitoring, citizen engagement, and results monitoring and evaluation. The objective is to ensure seamless project implementation under the Project Implementation Unit (PIU), enhancing project management capacity and ensuring that all project activities align with the intended outcomes and sustainability goals.

Implementation Arrangements

The General Directorate of Infrastructure Investments (AYGM) is the implementing agency of the project. AYGM is a public institution affiliated with the Ministry of Transport and Infrastructure (MoTI) with a special budget for finance. After the completion of the construction works, the project will be handed over to The Republic of Türkiye Directorate General of State Railways (TCDD) and the operational activities will be performed by TCDD.

A PIU has already been established under AYGM for the ongoing World Bank-financed Rail Logistics Improvement Project – P170532 (RLIP). For this Project, an ETMIC-dedicated PIU sub-unit will be established under this PIU. Among other specialists the ETMIC sub-unit will be staffed by Environmental, Social, Health and Safety (ESHS) manager, environmental specialist, social development specialist and two Community Liaison Officers who will be responsible for the implementation and monitoring of this SEP.

Additionally, to address the risk of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), consultations with communities adjacent to the project are essential throughout the project's life cycle. These regular consultations should offer opportunities to share information about project-related risks and response measures, especially focusing on women, children, and other vulnerable groups who may require distinct approaches to ensure a safe space for discussion.

1.2 Scope and Objectives of SEP

The overarching goal of this SEP is to establish a comprehensive program for engaging stakeholders, encompassing public information disclosure regarding the project and its potential environmental and social risks and adverse impacts and consultation throughout the entire project life cycle. The SEP delineates the strategies through which the project team will communicate with stakeholders and incorporates a mechanism for individuals to express concerns, provide feedback, or register complaints related to project activities.

The primary objective of the SEP is to ensure a consultative process with all relevant parties, including individuals, groups, and organizations impacted by or interested in the project. It aims to maintain a continuous exchange of information between these stakeholders and project activities throughout its duration. Stakeholder engagement is pivotal in these projects as it enables stakeholders to stay informed at every stage, articulate their expectations and concerns, and establish an open communication channel with the project's investor.

The initial aspect of the SEP is meaningful consultation. A meaningful consultation;

- starts early in the project planning phase to gather initial opinions on the project proposal and guide project design.
- promotes stakeholder feedback, especially to inform project design and involve stakeholders in identifying and addressing environmental and social risks and impacts.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 11 / 64

- continues regularly as risks and impacts emerge.
- relies on the prior disclosure and distribution of adequate, relevant, clear, unbiased, meaningful, and easily accessible information within a period that allows meaningful consultations with stakeholders. This information is presented in a culturally appropriate format, in relevant local language(s), and is understandable to stakeholders.
- takes stakeholders' concerns, questions into account, and responds to feedback.
- SEP includes the establishment of a Grievance Mechanism through which stakeholders can submit their grievances or concerns, and which will be responded to in a timely and adequate manner.
- actively supports inclusive engagement with project-affected parties.
- is devoid of external manipulation, interference, coercion, discrimination, and intimidation.
- is recorded and disclosed by the Borrower.

The SEP has been developed to align and comply with national legal requirements and international standards, including the Environmental and Social Standards (ESSs) of the World Bank. The project will be implemented in accordance with both local national laws and international standards.

This project-specific SEP is a public document open to discussion with stakeholders and subject to regular updates to reflect the outcomes of ongoing engagement. The SEP comprises various components, including an explanation of its objectives, a brief description of the project, an overview of relevant stakeholder engagement standards (including World Bank requirements), a summary of previous engagement activities, identification and categorization of project stakeholders, methods for future engagement, roles and responsibilities for effective implementation, a Public Grievance Mechanism for addressing complaints and feedback, and means of monitoring and reporting.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 12 / 64

2 REGULATIONS AND REQUIREMENTS

2.1 Turkish Requirements

The Environmental Impact Assessment (EIA) Regulation requires stakeholder engagement and disclosure. The EIA Regulation includes certain provisions to ensure the participation of the public and relevant parties in the environmental impact assessment process. One of these provisions is the organization of public participation meetings in accordance with December 16th Pursuant to Article 9 of the EIA Regulation, which entered into force after being published in the Official Gazette dated 2003 and numbered 25318 to provide information about the effects of the project, and to receive opinions and suggestions. These meetings serve as an important platform for sharing information and dialogue about the environmental impacts of the project and the concerns of the public regarding the project. The Stakeholder Engagement Plan, defined in the regulation, details how communication and information provision will occur with individuals or groups affected by or related to a project. The Right to Information Law ensures everyone has the right to obtain information about public institutions. The Use of Right to Petition Law establishes legal remedies and authorities for relevant persons. The Personal Data Protection Law allows data subjects to lodge a complaint if their request is refused, and the Expropriation Law governs the expropriation process in accordance with specified laws.

Detailed information will be provided in Appendix-3: World Bank Standards and Key Gaps with the National Framework.

2.2 World Bank Requirements

This SEP has been prepared in accordance with the requirements of ESS10.

The World Bank's Policy on Access to Information emphasizes the principle that the World Bank, including the International Bank for Reconstruction and Development and the International Development Association, will conduct stakeholder consultations and disclose all non-exempt information it possesses. The policy delineates a transparent process for public information release and grants the right to appeal if individuals feel they were unfairly denied access or if a public interest case justifies overriding exceptions limiting information access.

The WB discloses disclosed information - and requires the client to disclose E&S instruments and to conduct stakeholder consultations

Detailed information will be provided in Appendix-3: World Bank Standards and Key Gaps with the National Framework.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 13 / 64

3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Within the scope of the EIA report prepared by the General Directorate of DLH Construction for the Kars Tbilisi Railway Project, regarding the Kars-Tbilisi Railway Project and Material Quarries;, "Public Participation Meetings" were held on 28.7.2005 and 27.07.2006 in Kars and Ardahan in order to ensure public consultations in the EIA process, to inform about the activity, to receive opinions and suggestions in the places where the meeting dates, meeting places and names are given below. Announcement texts and project summaries were prepared to announce the Public Participation Meeting to the public;

- An advertisement was published in a national newspaper,
- Advertisement in the local newspaper,
- Announcement was made on the governorate bulletin board,
- Announcements were made in district governorships,
- Announced in municipalities,
- Announcements were made to settlements that may be affected by the railway route,
- Brochures about the project were distributed to the participants of the public participation meeting.
- The meetings were conducted at: 12.00 in Yukarı Canbaz Village-Çıldır-Ardahan (28.07.2005) and on 27.07.2006 Time: 14.00 at Kars Art Center Conference Hall-Kars. The general questions asked at the meetings were centered on the following:
 - Expropriation costs are low and how much area will be expropriated
 - How will transitions to agricultural areas and animal crossings be provided on the route
 - Whether the station locations are close to their own settlements and whether local communities can use these stations for transportation
 - Whether there will be any damage to the existing facilities and planned projects of the public institutions and organizations participating in the meeting around the railway route and what measures will be taken
- In the Public Participation Meeting held in Yukarı Canbaz Village within the borders of Ardahan Province, it was requested that the Railway Route should pass west of Çıldır.

The last informative actions on the project were conducted in 2005 and 2006 and no further stakeholder engagement activities have been conducted after these dates. The project was initially conceptualized in 2006, at which point it entered the planning phase, with preliminary efforts steadily advancing under the oversight of the Ministry. Despite these early developments, the project encountered delays and was effectively paused due to prevailing political considerations. In 2022, a strategic decision was made to formally incorporate the project into the government's investment agenda.

As part of the project, stakeholder participation/consultation meetings have been held in three locations across the provinces of Kars, Erzurum, and Erzincan on 25.09.2024 and 26.09.2024. A Leaflet prepared for the project (see Appendix-5) has been posted in areas close to the meeting sites along with invitation letters, and governmental organizations were also notified through an official letter (see Appendix-5). Additionally, efforts were made to reach the Mukhtars, who were consulted during the ESIA process, via WhatsApp platform using their contact numbers.

Information about the meetings is provided in Table 1.

Table 1. Information about the Stakeholder Participation Meetings

Meeting Province	Meeting Place	Address	Date	Time	Number of Participants
Kars	Kars Train Station	İstasyon Neighborhood, 36100 Kars City Center/Kars	25.09.2024	15:00-17:00	25
Erzurum	Erzurum Train Station	Ömer Nasuhi Bilmen Neighborhood, İstasyon Square, 25200 Yakutiye/Erzurum	26.09.2024	10:00-11:30	18
Erzincan	Erzincan Train Station	Çarşı Neighborhood, 24040 Erzincan City Center/Erzincan	26.09.2024	16:00-18:00	28

The meetings were recorded, and the minutes of the meetings are included in Appendix-5, along with photographs from the sessions. However, due to personal data protection laws (KVKK), the participant list for each meeting is not shared.

The project introduction and all environmental and social documents prepared as part of the project are available on AYGEM's website (<https://aygm.uab.gov.tr/dogu-turkiye-orta-koridor-demiryolu-gelistirme-projesi>).

Kars

During the stakeholder meeting held at Kars Train Station on 25.09.2024 with the participation of 25 people (see Figure 1), the following issues, related to questions and concerns, were raised:

- The start and end dates of the project,
- Whether operational activities on the existing line and stations will continue during the construction phase of the project,
- The future employment conditions of the current employees if stations are closed during the construction phase,
- Details of the activities and designs to be carried out within the scope of the project,
- Deficiencies in the existing engineering structures (culverts, tunnels, bridges) along the project route, modifications required for the double line, and the need to remove and rehabilitate the waste dump site (Sarıkamış location) on the train route.
- Suggestions regarding the line design and rehabilitation.

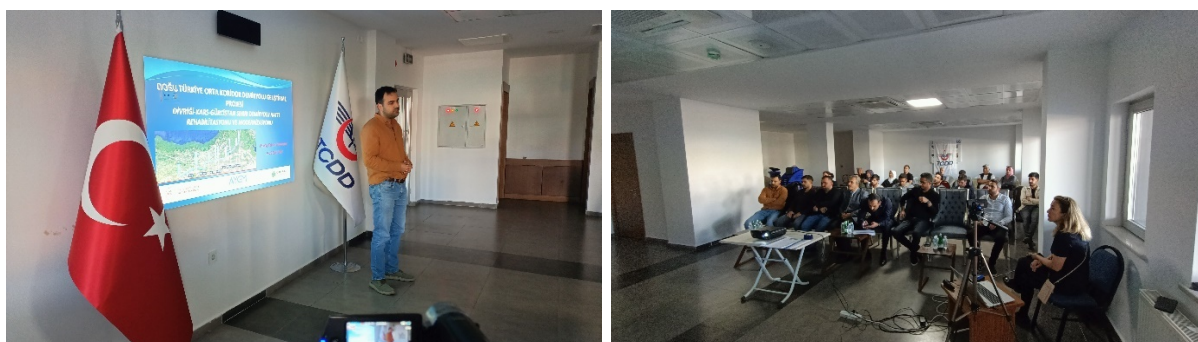


Figure 1. Stakeholder Participation Meeting in Kars Train Station

Erzurum

During the stakeholder meeting held at Erzurum Train Station on 26.09.2024, with the participation of 18 people (see Figure 2), the following issues, related to questions and concerns, were raised:

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 15 / 64

- The start and end dates of the project,
- Whether operational activities on the existing line and stations will continue during the construction phase of the project,
- The scope of the works to be carried out,
- Details of existing old structures and structures made of stone, brick, and concrete, bonded together with mortar, as well as engineering structures that need renewal (such as culverts and tunnels),
- The necessity of including TCDD in the supervision phase of the construction period,
- How the credit process works.



Figure 2. Stakeholder Participation Meeting in Erzurum Train Station

Erzincan

During the stakeholder meeting held at Erzincan Train Station on 26.09.2024, with the participation of 28 people (see Figure 3), the following issues, related to questions and concerns, were raised:

- The start and end dates of the project,
- Whether operational activities on the existing line and stations will continue during the construction phase of the project,
- Due to the geography of the Kemah-Divriği line, the current challenges, operational difficulties, and proposed solutions including;
 - Constructing a new line between Kemah and Çetinkaya and/or relocating the existing line,
 - Identifying an alternative route,
 - Improving the highway network, as the current railway line is the only access route in some locations.
- The need to improve and rehabilitate the line, considering the current operational security and train traffic safety weaknesses, while taking into account climate, weather conditions, and natural disaster scenarios,
- Updating the hydraulic and feasibility studies currently conducted along the line route and finalizing the railway design using the latest data.

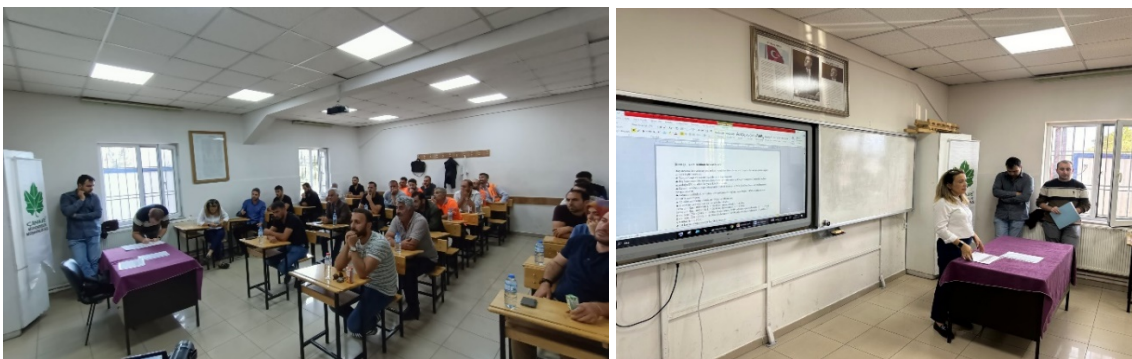


Figure 3. Stakeholder Participation Meeting in Erzincan Train Station

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Social Impact Area

When determining the social impact area of the project, two units were taken into consideration. The first is the stations, and the second is the railway. A 0-500 m corridor was used to determine the social impact area around the stations. For assessing the social impact area around the railway, a 0-5 km corridor was considered. According to the information provided by AYGM, the main activities of the project will be conducted around the stations and their surroundings. Therefore, the primary social impact areas of the project are the 0-500 m corridors considering stations as the central points. The secondary social impact area of the project is the 0-5 km corridors, considering the railway lines between stations as the central points. The direct impacts of the project will be observed within the 0-500 m corridor, while the indirect impacts will be observed within the 0-5 km corridor. As a summary;

- 1st Social Impact Area, 0-500 m buffer, Primary Social Impact Area, Direct impacts of the Project: Center of the social impact area is the Stations. Station employees are at the very core of this impact area. Additionally, this social impact area also includes the settlements around the stations, which are located within the 500 m corridor.
- 2nd Social Impact Area, 0-5 km buffer, Secondary Social Impact Area, Indirect impacts of the Project. The center of the social impact area is the railway line. This social impact area includes the settlements around the railway line, which are located within the 0 - 5 km corridor.

4.2 Identification of Stakeholders

Stakeholders are identified in four steps according to the social impact areas. These steps are as follows. Please refer to ESIA Section Socio-Economic Environment to review the baseline conditions regarding the identified stakeholders, findings of social research, impact assessment, and mitigation measures. Details of the identified stakeholders are given in Appendix-4: List of Stakeholders and Appendix-10 of ESIA, too.

The distribution of these stakeholders according to social impact areas and their descriptions are provided below:

1st Social Impact Area

- Step 1: Project Affected Parties (PAP), Directly affected PAPs and Disadvantaged / Vulnerable Individuals or Groups (DVIGs): Individuals or groups directly affected by the project. In this project, the employees of the stations, passengers, local people around the settlements, and local representatives of these settlements, respectively. They are stated within the 1st social impact area.
- List of the relevant stations and approximate number of the employees are given via Table 2. The identified number of station employees is around 19. The average number of employees at rural stations is around 4. The number of employees at main stations is unknown.
- List of the 48 settlements located nearby of the 42 stations are given via Table 3. Total population of these settlements is 72,413.

Table 2. Employee Information by Stations

#	Name of the facility	Km	Current condition	Province	Description of employee
1.	Canbaz	1432+349	Station	Ardahan	<i>There is no permanent employee. The responsible staff is assigned by Directorate General of TCDD, Railway Maintenance Directorate, Kars 47th Branch</i>

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 17 / 64

#	Name of the facility	Km	Current condition	Province	Description of employee
2.	Taşbaşı	1416+349	Station	Kars	<i>There is no permanent employee. The responsible staff is assigned by Directorate General of TCDD, Railway Maintenance Directorate, Kars 47th Branch</i>
3.	Güvercin	1397+149	Station	Kars	<i>There is no permanent employee. The responsible staff is assigned by Directorate General of TCDD, Railway Maintenance Directorate, Kars 47th Branch</i>
4.	Kars	1365+204	Kars Main Station	Kars	Both male and female <i>No information</i>
5.	Dikme	1352+150	Abandoned Stop / Station	Kars	No employee
6.	Benli Ahmet	1340+550	Station	Kars	No employee
7.	Selim	1329+945	Station	Kars	Consultation could not be realized
8.	Sarıkamış	1305+615	Station	Kars	Both male and female 7 staffs
9.	Soğanlı	1288+850	Station	Kars	No employee
10	Topdağı	1273+531	Station	Kars	Both male and female 5 staffs
11	Süngütaşı	1260+280	Station	Kars	Both male and female 6 staffs
12	Hızır İlyas	1248+408	Abandoned Stop / Station	Erzurum	No employee
13	Horasan	1233+879	Station	Erzurum	Only male 4 staffs
14	Karaçuha	1219+943	Abandoned Stop / Station	Erzurum	No employee
15	Köprüköy	1206+485	Station	Erzurum	Only male 4 staffs
16	Hasankale	1189+298	Station	Erzurum	Only male 5 staffs
17	Alvar	1180+762	Abandoned Stop / Station	Erzurum	No employee
18	Uzun Ahmet	1167+219	Station	Erzurum	Only male 4 staffs
19	Erzurum	1148+672	Main station	Erzurum	Both male and female <i>No information</i>
20	Kaplıca(Ilica)	1133+496	Station	Erzurum	Both male and female 6 staffs
21	Çiçekli	1124+500	Abandoned Stop / Station	Erzurum	No employee
22	Kandilli	1108+989	Station	Erzurum	Only male 6 staffs
23	Aşkale	1093+221	Station	Erzurum	Both male and female
24	Saptıran	1080+463	Abandoned Stop / Station	Erzurum	No employee
25	Erbaş	1047+637	Station	Erzincan	No employee
26	Çadirkaya	1033+998	Station	Erzincan	Only male 6 staffs
27	Mercan	1021+812	Station	Erzincan	Only male 8 staffs
28	Altinkent	1011+460	Abandoned Stop / Station	Erzincan	No employee
29	Demirkapı	998+831	Station	Erzincan	Only male

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 18 / 64

#	Name of the facility	Km	Current condition	Province	Description of employee
					7 staffs
30	Geçit	981+650	Station	Tunceli	No employee
31	Tanyeri	966+648	Station	Erzincan	Only male 10 staffs
32	Altınbaşak	951+338	Abandoned Stop / Station	Erzincan	No employee
33	Erzincan	933+784	Main station	Erzincan	Both male and female
34	Dumanlı	921+002	Abandoned Stop / Station	Erzincan	No employee
35	Alp	901+798	Station	Erzincan	Only male 7 staffs
36	Kemah	885+765	Station	Erzincan	Both male and female 9 staffs
37	Eriç	868+650	Station	Erzincan	Only male 6 staffs
38	Güllübağ	851+457	Station	Sivas	No employee
39	İliç	832+434	Station	Erzincan	Only male 10 staffs
40	Bağıtaş	821+802	Station	Erzincan	Both male and female 6 staffs
41	Çaltı	804+599	Station	Erzincan	Both male and female 10 staffs
42	Dazlak	793+500	Abandoned Stop / Station	Sivas	No employee

Table 3. Settlements around the Stations

	Station	Province	District	Settlement	Population (2024)
1	Dazlak	Sivas	Divriği	Gezey	18
2	Güllübağ	Sivas	Divriği	Güllübağ	771
3	Eriç	Erzincan	Kemah	Eriç	40
4	Kemah	Erzincan	Kemah	Çarşı	1,106
5	Alp	Erzincan	Kemah	Alpköy	67
6	Dumanlı	Erzincan	Kemah	Akyünlü	39
7	Erzincan	Erzincan	Merkez	Çarşı Mahallesi	2,512
8	Altınbaşak	Erzincan	Üzümlü	B. Kadagan	134
9	Altınbaşak	Erzincan	Üzümlü	Fırat	225
10	Altınbaşak	Erzincan	Üzümlü	İstasyon	276
11	Altınbaşak	Erzincan	Üzümlü	K. Kadağan	242
12	Altınbaşak	Erzincan	Üzümlü	Pınarbaşı	514
13	Altınbaşak	Erzincan	Üzümlü	Süleymanlı	425
14	Tanyeri	Erzincan	Üzümlü	Avcılar	142
15	Geçit	Tunceli	Pülümür	Yarbaşı	48
16	Demirkapı	Erzincan	Üzümlü	Bağlar	84

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 19 / 64

	Station	Province	District	Settlement	Population (2024)
17	Altinkent	Erzincan	Tercan	Kargın	2,131
18	Mercan	Erzincan	Tercan	Akşemsettin	651
19	Mercan	Erzincan	Tercan	Atatürk	2,443
20	Çadırkaya	Erzincan	Tercan	Camiikebir	692
21	Çadırkaya	Erzincan	Tercan	Gözeler	424
22	Çadırkaya	Erzincan	Tercan	Yeni Mahalle	541
23	Erbaş	Erzincan	Çayırlı	Çataksu Köyü	165
24	Saptıran	Erzurum	Aşkale	Saptıran	148
25	Aşkale	Erzurum	Aşkale	Üç Mart	483
26	Aşkale	Erzurum	Aşkale	İstasyon	2,027
27	Kandilli	Erzurum	Aşkale	Kandilli	894
28	Çiçekli	Erzurum	Aziziye	Çiğdemli	475
29	Kaplıca(Ilica)	Erzurum	Aziziye	Ilica	8,002
30	Erzurum	Erzurum	Yakutiye	Ömer Nasuhi Bilmen	29,254
31	Uzunahmet	Erzurum	Palandöken	Uzun Ahmet	165
32	Alvar	Erzurum	Pasinler	Çöğender	559
33	Hasankale	Erzurum	Pasinler	Kethuda	866
34	Köprüküyü	Erzurum	Köprüküyü	Şehitler	1,033
35	Karaçuha	Erzurum	Horasan	Karaçuha	59
36	Horasan	Erzurum	Horasan	Esentepe	841
37	Hızır İlyas	Erzurum	Horasan	Hızır İlyas	314
38	Süngütaş	Kars	Sarıkamış	Süngütaş	126
39	Soğanlı	Kars	Sarıkamış	Sırbasan	150
40	Sarıkamış	Kars	Sarıkamış	İstasyon	1,161
41	Selim	Kars	Selim	Köprübaşı	574
42	Benli Ahmet	Kars	Selim	Benli Ahmet	645
43	Dikme	Kars	Merkez	Cumhuriyet	7,335
44	Kars	Kars	Merkez	Hafızpaşa	2,581
45	Güvercin	Kars	Arpaçay	Güvercin	306
46	Taşbaşı	Kars	Arpaçay	Taşbaşı	188
47	Canbaz	Ardahan	Çıldır	Yukarıcambaz	329
48	Canbaz	Ardahan	Çıldır	Aşağıcambaz	208
					72,413

2nd Social Impact Area

- Step 2: Indirectly affected PAPs; Individuals or groups indirectly affected by the project. In this project, indirectly affected PAPs are local people around the railway line, and local representatives of these settlements, respectively. They are stated within the 2nd social impact area. Information on DVIGs has also been obtained here.

- The list of the 144 settlements located around the railway line are given via Table 4 with their current population. The total population of these settlements is 72,057.

Table 4. Settlements around the railway line

Province, District	Settlements	Population (2024)
Ardahan		574
Ardahan, Çıldır		574
1.	Akçakale	202
2.	Damlıca	148
3.	Karakale	224
Erzincan		17,294
Erzincan, Çayırlı		29
4.	Doluca	29
Erzincan, Central		9,587
5.	Barış	829
6.	Bayrak	469
7.	Beşsaray	402
8.	Cemal Gürsel	245
9.	Gani Efendi Çiftliği	267
10.	Karadiğın	388
11.	Oğlaktepe	184
12.	Pekmezli	29
13.	Sancak	887
14.	Şehit Cengiz Topel	1,497
15.	Söğütözü	148
16.	Ulalar	4,242
Erzincan, İliç		3,859
17.	Abdullahpaşa	1,044
18.	Atma	49
19.	Bağıtaş	86
20.	Büyükköy	55
21.	Çaltı	411
22.	Çöpler	314
23.	İbrahim Çeçen	1,864
24.	Ortatepe	36
Erzincan, Kemah		2,111
25.	Aşağı Gedik	52
26.	Atma	75
27.	Beklimçay	72
28.	Beşikli	61
29.	Dedek	28
30.	Göğüsbağı	612
31.	Gökkaya	94
32.	Kayabaşı	46
33.	Koçkar	143
34.	Koruyolu	23
35.	Küplü	118
36.	Mermerli	211
37.	Muratboynu	85
38.	Oğuz	93
39.	Olukpınar	73
40.	Sürek	43
41.	Uluçınar	42
42.	Yahşılar	96
43.	Yastıktepe	144
Erzincan, Tercan		536
44.	Gökçe	151
45.	Köprübaşı	21
46.	Sucuali	41
47.	Yeşilyayla	139
48.	Yollarüstü	184

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 21 / 64

Province, District	Settlements	Population (2024)
Erzincan, Üzümlü		1,172
49.	Demirpınar	95
50.	Denizdamı	32
51.	Derebük	16
52.	Karakaya Köyü	567
53.	Pelitli	55
54.	Pişkıdağ	407
Erzurum		17,548
Erzurum, Aşkale		3,943
55.	Altıntaş	49
56.	Çayköy	588
57.	Dallı	47
58.	Demirkıran	55
59.	Karasu	29
60.	Kıbrıs	1,033
61.	Küçükgeçit	252
62.	Pırnakapan	83
63.	Şafak	1,325
64.	Sazlı	54
65.	Taşagıl	127
66.	Tecer	11
67.	Topalçavuş	290
Erzurum, Aziziye		773
68.	Alaca	260
69.	Atlıkonak	207
70.	Demirgeçit	306
Erzurum, Horasan		4,081
71.	Azap	265
72.	Bulgurlu	635
73.	Camii Kebir	790
74.	Çiftlik	132
75.	Dalbaşı	164
76.	İnönü	1,401
77.	Şerefiye	694
Erzurum, Köprüköy		204
78.	Yapağılı	168
79.	Yukarı Söğütlü	36
Erzurum, Palandöken		313
80.	Nene Hatun	313
Erzurum, Pasinler		5,375
81.	Alvar	801
82.	Bahçelievler	1,344
83.	Büyüktüy	250
84.	Çakırtaş	451
85.	Ebsemce	461
86.	Övenler	258
87.	Paşabey	826
88.	Pusudere	77
89.	Reşadiye	341
90.	Şehit Burak Karakoç	221
91.	Üğümü	251
92.	Yukarıdanişment	94
Erzurum, Yakutiye		2,859
93.	Çiftlik	1,145
94.	İstasyon	714
95.	Müdürge(Çayırtepe)	560
96.	Soğukçermik(Soğucak)	440
Kars		35,897
Kars, Arpaçay		2,753
97.	Aydınğün	222
98.	Çanaksu	193
99.	Doğruyol	739

Province, District	Settlements	Population (2024)
100.	Göldalı	158
101.	Gönülalan	159
102.	Kakaç	92
103.	Kümbet	310
104.	Kuzgunlu	44
105.	Yenimahalle	836
Kars, Central		21,468
106.	Aydınlıkevler	3,036
107.	Dikme	720
108.	Halitpaşa	3,719
109.	Karacaören	236
110.	Karadağ	1,031
111.	Ladikars(Kümbetli)	1,356
112.	Mezra	367
113.	Örnek	4,316
114.	Paşacayır	2,826
115.	Yeni Mahalle	3,861
Kars, Sarıkamış		3,812
116.	Çatak	225
117.	Karaurgan	493
118.	Kurbançayır	224
119.	Sırataşlar	55
120.	Tepe	1,658
121.	Yağbasan	228
122.	Yenigazi	501
123.	Yeniköy	428
Kars, Selim		5,975
124.	Aşağıkotanlı	107
125.	Çarşı	2,635
126.	Cavlak	66
127.	Çaybaşı	108
128.	Cumhuriyet	2,505
129.	Karaçayır	140
130.	Yolgeçmez	274
131.	Yukarıkotanlı	140
Kars, Susuz		1,889
132.	Çamçavuş	235
133.	Cumhuriyet	262
134.	Harmanlı	543
135.	Porsuklu	385
136.	Yolboyu	464
Sivas		420
Sivas, Divriği		420
137.	Adatepe	97
138.	Aşağıhamam	170
139.	Çobandurağı	52
140.	Kalealtı	72
141.	Oyuktepe	29
Tunceli		324
Tunceli, Pülümür		324
142.	Başkalecik	64
143.	Dağyolu	72
144.	Doğanpınar	188
Population (2024)		72,057

- Step 3: Other Interested Parties (OIP); Local and regional institutions who may be interested in the project. In this project these are stated in the centers of districts and provinces. All the stakeholders are identified and listed on Appendix-4: List of Stakeholder and Appendix 10 of ESIA document.

A short list to describe identified stakeholders are provided via Table 5, and Table 6.

Table 5. Summary list of OIPs

Level		Name, if available	Identification
Governmental Institution	National	Ministries	OIP
		Regional	Directorates
	General directorates		OIP
	Regional directorates		OIP
	Development Agencies		OIP
	Provincial	Governorship	OIP
		Metropolitan municipalities	OIP
		Municipalities	OIP
		Provincial directorates of Ministries	OIP
		Provincial special administrations	OIP
	District	District governorship	OIP
		Municipalities	OIP
		District directorate of Ministries	OIP
		Rural service delivery union	OIP
		District special administrations	OIP
	Educational Institutions	Neighborhoods, Villages, Districts, and Provinces	Primary school
Secondary school			OIP
Districts, and Provinces		High school	OIP
		Vocational and technical high school	OIP
		Vocational school of higher education	OIP
		Universities	OIP
Healthcare institutions	Neighborhoods, Villages, Districts, and Provinces	Family healthcare centers	OIP
		Community healthcare centers	OIP
	Districts, and Provinces	Hospitals	OIP
		Integrated hospitals	OIP
		Research hospitals	OIP
Law Enforcement Forces	Districts, and Provinces	Gendarmerie	OIP
		Police	OIP
Union / Chamber / Association	Neighborhoods, Villages, Districts, and Provinces	Agriculture	OIP
		Irrigation	OIP
		Husbandry	OIP
		Beekeeping	OIP
		Fishery	OIP
Energy	Districts, Provinces, and Regional	Electricity distribution company	OIP
		Natural gas distribution company	OIP
Transnational investments	Regional	TANAP	OIP
		BTC	OIP

Level		Name, if available	Identification
Other investments	Districts, Provinces, and Regional	Mining areas	OIP
		Dams	OIP
		Power plants	OIP
		Factories	OIP
		Organized industrial zones	OIP
		Logistic centers	OIP
Companies	Districts, Provinces, and Regional	Mining	OIP
		Logistic	OIP
Non-governmental organizations	Villages	Village associations	OIP
Media	Districts, Provinces, and Regional	Local newspaper	OIP
		Local television / radio	OIP

Table 6. Summary list of PAPs

Directly and indirectly affected parties	Description	Identification	Relation
Local residents	Village	PAP	Direct Indirect
	Neighborhood	PAP	Direct Indirect
	District center	PAP	Direct Indirect
	Provincial center	PAP	Direct Indirect
	Youth <i>University students</i>	PAP	Direct
	Students Primary and secondary school	PAP	Direct
	Female Worker	PAP	Direct
	Ethnic groups Alevi, Meskhetian Turks, Kurdish, Zazaki	PAP	Direct
	People who depend on a sole source of livelihood Farmer, fishermen, beekeeper	PAP	Direct
	Village / Neighborhood	Mukhtarship	PAP
Station employee	Station manager	PAP	Direct
	Train formation worker	PAP	Direct
	Track maintenance and repair officer	PAP	Direct
Vulnerable groups	Non-Turkish-speaking groups / individuals	Vulnerable groups	
	Elderly		
	Women who are heads of households living alone		
	People with disabilities		
	illiterates		

- It is expected that the following groups will be more significantly affected than others by the anticipated adverse impacts of the project. They are already covered by directly affected PAPs. These stakeholders, along with groups dependent on livelihood sources such as agriculture, animal husbandry, and fisheries, have also been included in the

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 25 / 64

study to assess the impacts of the project on these activities. Identified these directly affected PAPs can be listed as following;

- Youth: University students
 - Students: Primary and secondary school students
 - Female workers: Railway line employees and other sectors such as health
 - Ethnic groups: Alevi, Meskhetian Turks
- People who depend on a sole source of livelihood: farmer, fishermen, beekeepers.

4.3 Disadvantaged/Vulnerable Individuals or Groups (DVIG) Disadvantaged/Vulnerable Individuals or Groups (DVIG)

In accordance with ESS10, this project defines vulnerable groups based on characteristics that might limit their access to project-related information, participation in consultations, and access to announcements. Consequently, non-Turkish-speaking individuals, the elderly, and people with disabilities are identified as vulnerable groups for this project. Most data on these Disadvantaged and Vulnerable Individuals and Groups have been gathered during Step 1 and Step 2 of the studies.

- **Non-Turkish speaker people:** 28% of all households. In light of the results, it is observed that languages other than Turkish are spoken in 63 settlements (45%), with some settlements having more than one language spoken other than Turkish. The languages reflected in the records, based on intensity, include Kurdish, Zazaki, Azerbaijani, Laz, and Arabic. In terms of language diversity, the most heterogeneous region is Erzincan (please refer to Section 4.12.9 of ESIA).
 - It was mentioned that in 106 out of 383 households, languages other than Turkish are spoken. The total number of people in these households is 488.
 - According to information obtained from the mukhtars of 140 settlements where interviews were conducted, languages other than Turkish are spoken in 63 settlements. Although the number of people using these languages is unknown, their prevalence is high in the regions of Erzurum, Kars, and Erzincan. Details of the data on vulnerable groups in this area are presented in 4.12.9 Ethnic origin, Language, and Belief of ESIA report.
- **Illiterate individuals:** When evaluating the general education status of the settlements, only 7 out of 140 mukhtars responded that the education level of the settlements includes primary school graduates or illiterate individuals. During household interviews, 65 out of 383 households mentioned having individuals who are illiterate. This accounts for approximately 17% of the households (please refer to Section 4.12.3 of ESIA).
- **Elderly people:** Within the scope of household survey, the distribution of the population by age groups is as follows: 318 individuals are in the 0-14 age group (children), 1,176 individuals are in the 15-64 age group (working age), and 128 individuals are aged 65 and above (elderly). The overall ratio of elderly individuals is 8% (please refer to Section 4.12.1 of ESIA).
 - According to the data provided by the mukhtar, the population in 21 out of 140 settlements consists mostly of elderly people. The mukhtar of 17 settlements, who consider their population to be of middle age, have also indicated the elderly as the other dominant population group. In summary, the elderly population predominates in approximately 38 out of 140 settlements.
 - A significant vulnerable group within the elderly population is women who live alone and are heads of households. Among the 140 settlement mukhtars interviewed, 115 responded to the question "How many elderly women living alone as household heads are there in the settlement?" Approximately 2,000 individuals are mentioned in this context.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 26 / 64

- **Disabled people:** In the household survey, out of a total of 1,622 individuals, 43 disabled individuals are mentioned. In the mukhtar interviews, the number of disabled individuals is approximately 978. In settlements around the station, the percentage of households with disabled individuals is 72%, while around the railway, this percentage goes up to 80% (please refer to Section 4.12.4 of ESIA).

4.4 Summary of Stakeholder Interest in and Influence Over the Project

This aspect involves understanding the concerns, needs, and expectations of different stakeholders in the railway line project. Stakeholders include local communities, environmental groups, businesses, government agencies, and others. Assessing their interest helps identify the aspects of the project that matter most to them, such as economic benefits, environmental impacts, or community well-being.

Stakeholder influence refers to the level of power or control that each stakeholder has over the project. Some stakeholders, like regulatory bodies or government agencies, may have significant influence due to their decision-making authority or legal powers. Local communities and environmental groups might influence the project through public opinion, activism, or legal challenges.

Understanding the interplay between stakeholder interest and influence is crucial for project management. It allows project planners to prioritize engagement efforts, address key concerns, and navigate potential challenges that may arise during the implementation of the railway line project. It also helps in fostering positive relationships with influential stakeholders and managing the expectations of those with high interest but lower influence.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 27 / 64

5 STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Purpose and Timing of Stakeholder Engagement Program

This aspect outlines the objectives and goals of involving stakeholders in the railway line project. It could include gaining community support, addressing concerns, obtaining valuable input for decision-making, ensuring regulatory compliance, or fostering positive relationships. The purpose is to clearly articulate why engaging stakeholders is essential and what the project aims to achieve through these interactions.

Timing of stakeholder engagement should include the following items;

- Determining when and how often stakeholder engagement activities will take place.
- In the planning phase, engagement focuses on gathering initial feedback and identifying key concerns.
- During the design phase, stakeholders should be involved in reviewing and providing input on specific aspects of the railway line.
- In the construction phase, communication should be emphasized updates on progress and addressing any emerging issues.
- In the operational phase, ongoing engagement focuses on monitoring impacts, addressing concerns, and maintaining positive relationships.

The purpose and timing of the stakeholder engagement program in a railway line project are integral to creating a structured and effective approach to involving those who are affected or have an interest in the project. This ensures that engagement efforts align with project objectives, are conducted at strategic points, and contribute to the overall success of the railway line implementation.

Detailed information is provided under Table 7.

Table 7. Stakeholder Engagement Plan

Timing	Main Topic	Management Plans	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
Land preparation and Construction	Environmental and Social (E&S) and OHS risks and disclosure of precautions Draft and final E&S documents	Draft and Final versions of the following documents: Environmental and Social Management Plan (ESMP) Community Health and Safety Management Plan (CHSMP) Emergency Preparedness and Response Plan (EPRP) Pollution Prevention and Waste Management Plan (PPWMP) Traffic Management Plan (TMP) Resettlement Framework (RF)	PAPs, OIPs, DVIG Settlements around the stations Settlements around the railway line Local and regional governmental institution Vulnerable groups Landowner /shareholders, if required in line with land acquisition	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents Consultation and information meeting with Landowner /shareholders, if required in line with land acquisition	Bilingual document meet local language Having an interpreter during meeting Access support for disabled people & elderly Technical assistance for illiterates	48 settlements around the stations 144 settlements around the railway line Landowner /shareholders, if required in line with land acquisition	Annual Prior to land acquisition activities if required in line with land acquisition	Contractor Social specialist Environmental specialist OHS specialist
Land preparation and Construction	Grievance mechanism	Draft version of SEP Final version of SEP including outputs of public consultations	PAPs, OIPs, DVIG Settlements around the stations Settlements around the railway line Local and regional governmental institution Vulnerable groups	Announcement of approved SEP	Technical assistance for illiterates	AYGM's website	Once	Contractor ETMIC sub-unit of the PIU
Land preparation and Construction	Grievance mechanism	Draft version of SEP Final version of SEP including outputs of public consultations	PAPs, OIPs, DVIG Settlements around the stations Settlements around the railway line Local and regional governmental institution Vulnerable groups	Announcement of approved SEP	Technical assistance for illiterates	AYGM's website	Once	Contractor ETMIC sub-unit of the PIU
Land preparation and Construction	Grievance mechanism	Draft and Final versions of the following documents: ESMP CHSMP EPRP PPWMP TMP Biodiversity Management Plan (BMP) Cultural Heritage Management Plan (CHMP) Occupational Health and Safety Management Plan (OHSMP) Labor Management Procedure (LMP)	PAPs,	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Not applicable	Worker accommodation area / camp site, if available Construction area Stations	Weekly	Contractor Worker representatives of Contractor
Land preparation and Construction	Discrimination and harassment SEA / SH GBV	Draft version of SEP Final version of SEP including outputs of public consultations LMP ESMP	PAPs Project workers	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Not applicable	Worker accommodation area / camp site, if available Construction area Stations	Annual	Contractor Social specialist
Operation	E&S and OHS risks and disclosure of precautions Draft and final E&S documents	ESMP CHSMP EPRP PPWMP TMP	PAPs, OIPs, DVIG Settlements around the stations Settlements around the railway line Local and regional governmental institution	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Having an interpreter during meeting Access support for disabled people & elderly	48 settlements around of the stations 144 settlements around of the railway line	Annual	Contractor Social specialist Environmental specialist OHS specialist

Timing	Main Topic	Management Plans	Identification of Targeted Stakeholders	Method used	Alternative methods for DVIG	Location	Frequency	Responsible Party
			Vulnerable groups					
Operation	Grievance mechanism	SEP	PAPs, OIPs, DVIG Settlements around the stations Settlements around the railway line	Announcement of revised SEP, if required	Technical assistance for illiterates, and elderly	48 settlements around of the stations 144 settlements around of the railway line	Once	Contractor ETMIC sub-unit of the PIU
Operation	Grievance mechanism	SEP LMP ESMP	PAPs	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Not applicable	Worker accommodation area / camp site, if available Construction area Stations	Semi annual	Contractor Worker representatives of Contractor
Operation	Grievance mechanism	SEP	PAPs, OIPs, DVIG Settlements around the stations	Informative meeting Presentations Informative visuals (brochures, posters etc.) Printed copies of project-specific documents	Technical assistance for illiterates	48 settlements around the stations	Annual	Contractor

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 30 / 64

5.2 Proposed Strategy for Information Disclosure

This strategy encompasses the details of what information will be disclosed, the formats in which it will be presented, and the methods used to communicate this information to different stakeholder groups.

The fact that what information will be disclosed involves specifying the types of information that will be made available to stakeholders. It would include project timelines, construction plans, environmental impact assessments, safety measures, community benefits, and any other relevant details that stakeholders may find important or informative.

The proposed strategy outlines the formats in which information will be presented. This could range from traditional written documents (such as reports, brochures, or fact sheets) to more modern methods, such as digital platforms, websites, or interactive presentations. The goal is to choose formats that are accessible and effective for each stakeholder group.

Methods of communication part of the strategy defines how the information will be communicated to different stakeholder groups. Methods may include community meetings, public forums, newsletters, social media updates, direct mail, and more. The selection of methods considers the preferences, needs, and accessibility of each stakeholder group.

In summary, the proposed strategy for information disclosure in a railway line project is a comprehensive plan that ensures transparency and effective communication with stakeholders. It addresses what information is shared, the formats used for presentation, and the communication methods employed to reach diverse stakeholder groups. This strategic approach aims to facilitate understanding, foster collaboration, and address concerns throughout the various phases of the railway project.

5.3 Proposed Strategy for Consultation

Proposed strategy for consultation involves specifying what information will be shared, the formats in which it will be presented, and the methods used to facilitate consultation with each stakeholder group.

The strategy defines the types of information that will be shared with stakeholders during the consultation process. All the Environmental and Social (E&S) management plans will be subject to consultation and disclosure. These management plans can be listed as the following;

- Environmental and Social Management Plan (ESMP)
- Stakeholder Engagement Plan (SEP)
- Labor Management Procedure (LMP)
- Labor Management Plan (LM Plan)
- Cultural Heritage Management Plan (CHMP)
- Biodiversity Management Plan (BMP)
- Community Health and Safety Management Plan (CHSMP)
- Pollution Management and Waste Management Plan (PPWMP)
- Traffic Management Plan (TMP)
- Occupational Health and Safety Management Plan (OHSMP)
- Emergency Preparedness and Response Plan (EPRP)

During the consultation information disclosure formats could involve public meetings, workshops, written documents, visual presentations, or online platforms, depending on the preferences and needs of the various stakeholder groups.

The strategy details the methods that will be used to communicate information during the consultation. Methods may include town hall meetings, focus group discussions, surveys,

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 31 / 64

online forums, and one-on-one interviews. Each method is chosen based on its effectiveness in engaging specific stakeholder groups and promoting meaningful dialogue.

The proposed strategy for consultation is designed to ensure that stakeholders have the opportunity to provide input, ask questions, and express concerns regarding the railway line project. By specifying what information will be shared, in what formats, and through which methods, the strategy aims to facilitate open and effective communication, promote collaboration, and address the diverse needs of stakeholders throughout the project's lifecycle.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 32 / 64

5.4 Proposed Strategy to Incorporate the View of Disadvantaged/Vulnerable Groups

Key elements of such a strategy should include:

- Clearly defining and identifying the specific disadvantaged or vulnerable groups within the project area. This could include low-income communities, marginalized populations, ethnic minorities, or those with limited access to resources and information.
- Designing communication and engagement methods that are culturally sensitive, accessible, and tailored to the specific needs of disadvantaged or vulnerable groups. This might involve using local languages, conducting targeted outreach, and selecting engagement platforms that are most effective for these communities.
- Ensuring that consultation processes are inclusive and provide a safe space for disadvantaged or vulnerable groups to express their views. This may involve conducting separate consultations, focus groups, or using participatory methods that facilitate meaningful engagement.
- Identifying and addressing barriers that may prevent the active participation of disadvantaged or vulnerable groups. This could include providing transportation assistance, ensuring meetings are held at accessible locations, and offering accommodation to support participation.
- Integrating the concerns, needs, and suggestions of disadvantaged or vulnerable groups into the decision-making processes of the railway line project. This ensures that the project's outcomes consider the broader social and economic implications for these communities.

Disadvantaged/vulnerable individuals or groups need additional measures to enable them to participate in stakeholder engagement activities.

- In meetings, having a support person proficient in sign language should be ensured for individuals with hearing impairments. Alternatively, meetings should be supplemented with visuals that include subtitles.
- Non-Turkish speaker individual can not access information related to E&S risks of the Project. Therefore, the regions where the proportion of non-Turkish speaker individuals is high, informative documents should be translated into local languages. In addition, informative meetings should be conducted by using a translator.
- Provision of information and signage in other languages than Turkish would be necessary as part of addressing issues of vulnerable groups.
- It would be appropriate to include languages other than Turkish in communication methods at locations where people who predominantly speak languages other than Turkish live or travel. Platforms, elevators, and other means should be provided for the access of physically disabled individual to meeting areas.
- Minutes of consultations meetings should be recorded. Reviewing/assessing the participation rates across local groups may indicate where extra efforts to improve the inclusion of specific sections of vulnerable groups are necessary.
- Information should be provided in a manner that is accessible and understandable for stakeholders.
- Necessary arrangements should be made to ensure that individuals with low educational levels and/or those who are not literate can benefit from the mentioned informational methods.

6 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 Implementation Arrangements

The expenditures associated with the SEP activities will be financed using the budget provided by the institution referred to as ETMIC sub-unit of the PIU. The responsibilities linked to SEP, and the necessary funds for these tasks, will be sourced from the budgets allocated by ETMIC sub-unit of the PIU for this specific purpose. The methods for information and disclosure encompass various channels both in print and online, as well as consultation meetings. These may include materials such as:

- Brochures, posters, flyers, etc., containing current information about the project, contractor, and facility in the form of introductory documents with informative short notes.
- The official website of the Project, where relevant documents are accessible online.
- Up-to-date announcements on the official website of the project.
- Current announcements on the Project's social media accounts.
- Bulletin boards placed inside and around the facility with warnings and information notes on occupational and environmental health, safety, security, and waste management.
- Request, complaint, and suggestion boxes located in and around the facility.
- Regular collaboration and consultation meetings with stakeholders on occupational and environmental health, safety, and waste management.
- Regular consultation meetings held with local and regional institutions and organizations.
- Collaboration and consultation meetings with relevant local and regional institutions for employment.
- In-depth interviews and discussions.
- Focus group meetings.
- Information and collaboration meetings covering the supply chain and potential buyers.

Detailed information is provided in Table 7 and Table 8.

6.2 Roles and Responsibilities

The entity overseeing the project will disseminate information regarding the project to all entities impacted by it, with particular emphasis on affected communities, residents, nearby establishments, and local government bodies. The project owner will actively engage in collaborating with these parties to identify crucial aspects of the project. The roles associated with the outlined administrative main responsibilities and their corresponding stakeholders are succinctly presented in Table 8 during stakeholder participation engagement activities.

Table 8. Roles and Responsibilities

Responsible Party	Responsibility	Content
ETMIC sub-unit of the PIU	Integrating all stakeholder engagement activities into the broader management systems.	<ul style="list-style-type: none"> • To establish an internal communication system to update senior management and staff, overseeing the ETMIC sub-unit of the PIU team for effective grievance mechanism implementation, coordinating with relevant parties, and conducting consultations on specific SEP.
ETMIC sub-unit of the PIU Social Development Specialist	Ensuring a clear understanding of stakeholder engagement by PIU and other stakeholders.	<ul style="list-style-type: none"> • To lead engagement activities with identified stakeholders, organizing Public Consultation Meetings and disclosure events, supporting ETMIC sub-unit of the PIU staff in stakeholder interactions.

Responsible Party	Responsibility	Content
		<ul style="list-style-type: none"> • To coordinate communication with the WB regarding SEP implementation. • To regularly update the SEP. • To share information with local communities and representatives. • To consult with and engage vulnerable groups in the vicinity.
ETMIC sub-unit of the PIU Environmental Specialist	To provide consolidated reports on overall SEP activities and the project's progress.	<ul style="list-style-type: none"> • To implement social and environmental monitoring. • To focus on reporting to the ETMIC sub-unit of the PIU and management. • To verify whether the social and environmental issues outlined in relevant documents are effectively implemented throughout the project's life.
ETMIC sub-unit of the PIU Grievance Mechanism	The role involves serving as the primary contact for GM in the MoTI PIU.	<ul style="list-style-type: none"> • To document and track grievances related to the project. • To manage and coordinate the resolution of these grievances. • To review records to identify significant non-compliance issues or recurring problems related to stakeholder engagement and other project activities. • To extend coordinating and monitoring GM at the contractor level. • To consolidate project-related grievances from various GM levels. • To inform ETMIC sub-unit of the PIU and management about the resolution process. • To prepare comprehensive GM reports for the project.
Social development specialist	Planning and implementation of SEP activities with MoTI	<ul style="list-style-type: none"> • To reach out to PAPs and stakeholders for site-specific project issues. • To conduct outreach at the regional and provincial levels. • To report on the implementation of SEP activities to the ETMIC sub-unit of the PIU. • To execute the defined grievance mechanism in the SEP effectively. • To keep ETMIC sub-unit of the PIU informed about the overall implementation status.
Contractor and subcontractor	Informing ETMIC sub-unit of the PIU of any issues related to their engagement with stakeholders	<ul style="list-style-type: none"> • To keep local communities informed about any environmental monitoring activities such as noise, vibration, water quality monitoring, etc. • To ensure transparency and awareness regarding the environmental impact of the project. • To develop and implement a GM specifically for the workforce, including subcontractors. • To address and resolve any concerns or grievances that may arise among the workforce. • To establish before the commencement of work to align with the requirements of the GM.
Supervision Consultant	Monitoring the contractors' recording and resolution of grievances, and reporting these to ETMIC sub-unit of the PIU in their monthly progress reports	<ul style="list-style-type: none"> • To reach out to the GM for the purpose of tracking and monitoring the progress of grievances. • To update, seek resolutions, and ensure that the grievance handling process is effectively managed and communicated within the project framework. • To maintain a coordinated and efficient system for addressing and resolving grievances within the context of the GM.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 35 / 64

7 GRIEVANCE REDRESS MECHANISM

7.1 Purpose and Scope

SEP document, developed for the project, delineated the project stakeholders, and established methods and schedules for engaging with them. The SEP outlines a comprehensive strategy for communication and engagement to ensure the fulfillment of project objectives and to execute the project in a transparent, participatory, responsive, and cooperative manner. Additionally, it sets up a mechanism for addressing grievances from stakeholders.

This grievance mechanism is established to promptly receive, and address complaints and concerns expressed by all stakeholders.

For projects funded by the World Bank, stakeholders will be informed about the guide prepared by the World Bank regarding the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV). Complaints related to GBV and SEA may lead to a culture of silence due to societal stigma. To counter this, stakeholders should be aware of the option to anonymously report such project-related complaints concerning these issues.

7.2 Roles and Responsibilities

The primary responsibility of ETMIC sub-unit of the PIU is to record and monitor complaints. In addition to ETMIC sub-unit of the PIU, the social experts of the Contractor will also be present on-site, following the guidelines in the SEP. Their duties include the recording and management of complaints. These designated personnel will adhere to the Grievance Mechanism to document and address all complaints from stakeholders, overseeing the specified mitigation measures. To enhance stakeholder awareness and facilitate transparent complaint submissions, project contact information will be disseminated via information meetings, project brochures, and the project website. Various official channels are available for stakeholders to voice their complaints;

- Phone Line: 03122031000
- Hot line: Alo 123
- E-Mail: aygm.ozelkalem@uab.gov.tr
- Grievance Registration Form: PAPs have the opportunity to complete grievance registration forms available at the construction site and other accessible public locations such as village coffehouse.
- Online Application: PAPs can fill in a complaint registration form online_ <https://www.cimer.gov.tr/>

7.3 Principles of Grievance Mechanism

Establishing a widely adopted grievance mechanism is crucial for resolving issues. The failure to address concerns in various projects often stems from affected persons lacking adequate information on how to utilize the grievance mechanism. A common grievance mechanism necessitates informing both affected individuals, and the development of suitable tools that enable diverse groups to access this mechanism. Hence, it is crucial to create appropriate tools that facilitate the accessibility of the mechanism for women, youth, the elderly, other vulnerable groups, and those who are illiterate.

The prompt reception of complaints is linked to the openness and accessibility of complaint channels. Complaints must be documented by the mechanism within 2 days, and the resolution process should be promptly initiated. A sample complaint registration form is included in Appendix-1 Registration Form.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 36 / 64

The grievance mechanism will be structured to accommodate the submission and resolution of anonymous complaints. Submitting a grievance will not necessitate personal information or physical presence; however, stakeholders have the option to include personal details if they choose to do so. All stakeholders will have the option to raise their complaints or concerns anonymously. This especially provides confidence to vulnerable individuals that they will not encounter any obstacles when expressing concerns. All grievances when received are logged into a GM database to facilitate tracking and monitoring.

Following thorough investigations, if resolving the issue falls under the responsibility of another unit, the complaint must be forwarded to the relevant unit within a maximum of 10 days.

The remedies and corrective actions proposed need to meet the satisfaction of the Complainant. It is essential that all involved parties reach an agreement on corrective actions during the resolution process. In scenarios where a satisfactory solution cannot be reached, a meeting should be arranged with the complainant, and holding consultation sessions with supervisor consultant. However, it should be understood by all parties involved that complainants who are not content with the resolution can seek legal recourse.

Should the complainant feel that the grievance has not been satisfactorily addressed by the ETMIC sub-unit of the PIU and specialists of ETMIC sub-unit of the PIU, they may request the matter to be escalated to the next level. A Grievance Redressal Committee (GRC) will be established, comprising local representatives and relevant institutional representatives. Independent experts will be selected from local universities, institutes, or non-governmental Organizations (NGOs). The GRC will be activated if a resolution cannot be reached at the initial level.

The complainant has the option to request ETMIC sub-unit of the PIU or Community Liaison Officer (CLO) at the site to forward their grievances to the GRC. This allows complaints previously considered by AYGM or Construction Contractors, yet unresolved, to be re-evaluated by the Committee. The ETMIC sub-unit of the PIU is tasked with updating the GRC on the discussions from the first stage of redressal and presenting the perspectives of both involved parties.

At the conclusion of the 30-day period allocated for resolving the complaint, the decision or outcome must be communicated to the complainant formally in writing. The date of this feedback will be documented in the Grievance Mechanism (GM) as the official closing date of the complaint. Actions taken to resolve the closed complaint should be monitored. A sample complaint closure form is provided in Appendix-2 Closeout Form.

World Bank's prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Gender-Based Violence (GBV) guideline prepared to inform Borrowers, and ETMIC sub-unit of the PIU about how to handle complaints.

To see all the steps of the grievance mechanism please refer to Figure 4.

7.3.1 Workers Grievance Mechanism

AYGM, currently has a grievance mechanism in place which allows all of its employees to raise workplace concerns. Pursuant to Article 21 of Law No. 657 (Civil Servants Law); Civil servants have the right to file a complaint and file a lawsuit against their institutions. Appeals and complaints (letter of application, petition etc.) are made by submitting the complaints to the next superior in the hierarchy after the employee's direct superior. Applications and complaints are examined and notified to the relevant party as soon as possible.

The complaint must be concluded within 30 days, from date of receipt of the first disciplinary supervisor authorized to decide. Civil Servants who exercise their right to complain cannot be fined for their complaints.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 37 / 64

Since ESS2 requires the establishment of Workers' Grievance Mechanism (WGM) for all Project workers, the contractors are also required to establish their own WGMs.

All Project workers will be informed about these WGMs at the time of their recruitment, and their employment contracts will involve detailed information of these WGMs including the ways they can convey their grievances and how these grievances will be recorded, handled, and monitored. The contractors will also ensure that the workers of their subcontractors are aware and can utilize the established WGM. The following principles on which the contractors will base their WGM will also be written in the relevant section of employment contracts:

- **Awareness.** WGM will be introduced to the workers at the workplace, through on-the-job training and other communication tools and participation methods. This introduction will explain the procedure, including the steps to be followed to convey complaints and requests, the channels of reception to be used, etc.
- **Accessibility.** The WGM will be established such that it can be accessed by workers easily, i.e. grievance boxes, e-mail, petition.
- **Anonymity.** Workers will have the right to submit their requests anonymously and these anonymous grievances will be treated equally with other complaints such as those of known origin.
- **Traceability.** The applications received from different channels of reception will be subject to a standard grievance mechanism operation procedure to be developed by the ETMIC sub-unit of the PIU.
- **Confidentiality.** The identities of complainants (if they do not prefer to be anonymous) will not be disclosed without obtaining their consent and their communication details will not be shared with third persons.
- **Archiving.** All complaints sent from application channels (written, verbal, etc.) will be recorded together with their supporting documents and will not be used for purposes other than the project implementation purposes, nor shall they be shared with third persons.

The WGM will be established according to the procedure below:

- **Step 1. Informal discussion:** Managers and workers are encouraged to use informal methods of resolving disagreements or disputes. If employees have a reasonable grievance or complaint regarding their work or the people they work with they should, wherever possible, start by talking it over with their manager. If discussions with line managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure, i.e., a human resources (HR) manager could host an informal meeting or discussion.
- **Step 2. Formal grievance:** If the matter is serious and/or the employee wishes to raise the matter formally, they should set out the grievance in writing to their manager. Where the grievance is against the employee's manager and the employee feels unable to approach them, the employee should address the grievance to another manager or the HR department. If there is a trade union at the workplace, the employee may wish to ask a union representative for advice and support.
- The contractor will provide appropriate channels to uptake formal grievances for the worker, i.e., e-mail, telephone, suggestion boxes. Especially, suggestion boxes should be placed so that anonymous grievances can be made.
- **Step 3. Grievance hearing:** A designated manager (normally from the HR department, hereafter the "grievance manager") will call the employee to a meeting, within a determined period after receiving the complaint, to discuss the employee's grievance. The employee should have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. After the meeting, the grievance manager will give the employee a decision in writing, within a determined period.
- **Step 4. Appeal:** If the employee is unhappy with the grievance decision and wishes to appeal, then the employee will be invited to an appeal meeting within a defined period

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 38 / 64

and the appeal will be heard by a more senior manager, ombudsman or a grievance committee. The members of the grievance committee will consist of at least the grievance manager, employee's manager (responsible from the work definition of the employee), one manager from the upper management and the aggrieved party/worker representative. The employee will normally have the right, upon request, to be accompanied by a colleague or trade union representative at this meeting. Every effort should be made to secure a resolution in the best interests of the worker(s) and the company. After the meeting, the senior manager, ombudsman or grievance committee will give the employee a decision. This decision is final within the terms of the company's internal grievance mechanism. If the worker is not satisfied, he or she will have the right to judicial or administrative channels.

If the construction contractors have an already established WGM, they can utilize that WGM provided that it is in line with the principles and procedures described in this section and records regarding the Project are kept separately. The requirements for contractor to establish WGM before the mobilization phase and to operate and maintain throughout the subproject activities will be incorporated in the bid documents.

For any complaint that has been forwarded or directly submitted—given that the contact details of the complainant are provided—the complainant will be informed, within two days that the complaint has been received. If the complaint is conveyed through suggestion boxes—provided that suggestion boxes at workplaces will be opened on a weekly basis—the complainant will be informed within two days after the suggestion box is opened. The social specialist of the Contractor and the relevant staff will investigate within two weeks and try to resolve the complaint. After two weeks, the aggrieved complainant would be given the status of resolution of his grievance.

Contractors will keep the written copies and a written list of complaints submitted to them. In addition, to facilitate analysis, monitoring and reporting, these complaints will be logged into a database, indicating contractor, type of complaint and solution. Contractors will send a copy of this database to the social development specialist of the ETMIC sub-unit of the PIU once a month, within the framework of standard reporting. The social development specialist of the ETMIC sub-unit of the PIU will maintain a master database of all complaints during the Project.

Sexual Exploitation and Abuse / Sexual Harassment

Project WGM will have a dedicated section for grievances related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) in case a worker prefers to raise this grievance through WGM as described at the Raising Concerns section of the CoC presented in Annex-1. The process for filing a grievance must be simple and easy to understand and clearly prohibit any kind of reprisal against workers who file grievances, including those relating to sexual harassment. Without adequate safeguards in place, there are risks of stigmatization and reprisals against workers who make allegations of sexual harassment.

The grievance receiving party will ensure that the case is dealt with through a survivor-centric approach respecting confidentiality and anonymity of the person and survivors are referred to service providers. Opinions of experts and consultants can be obtained in the solution to these problems in accordance with the national legislation and World Bank standards.

The protocols and procedures should be based on the following principles:

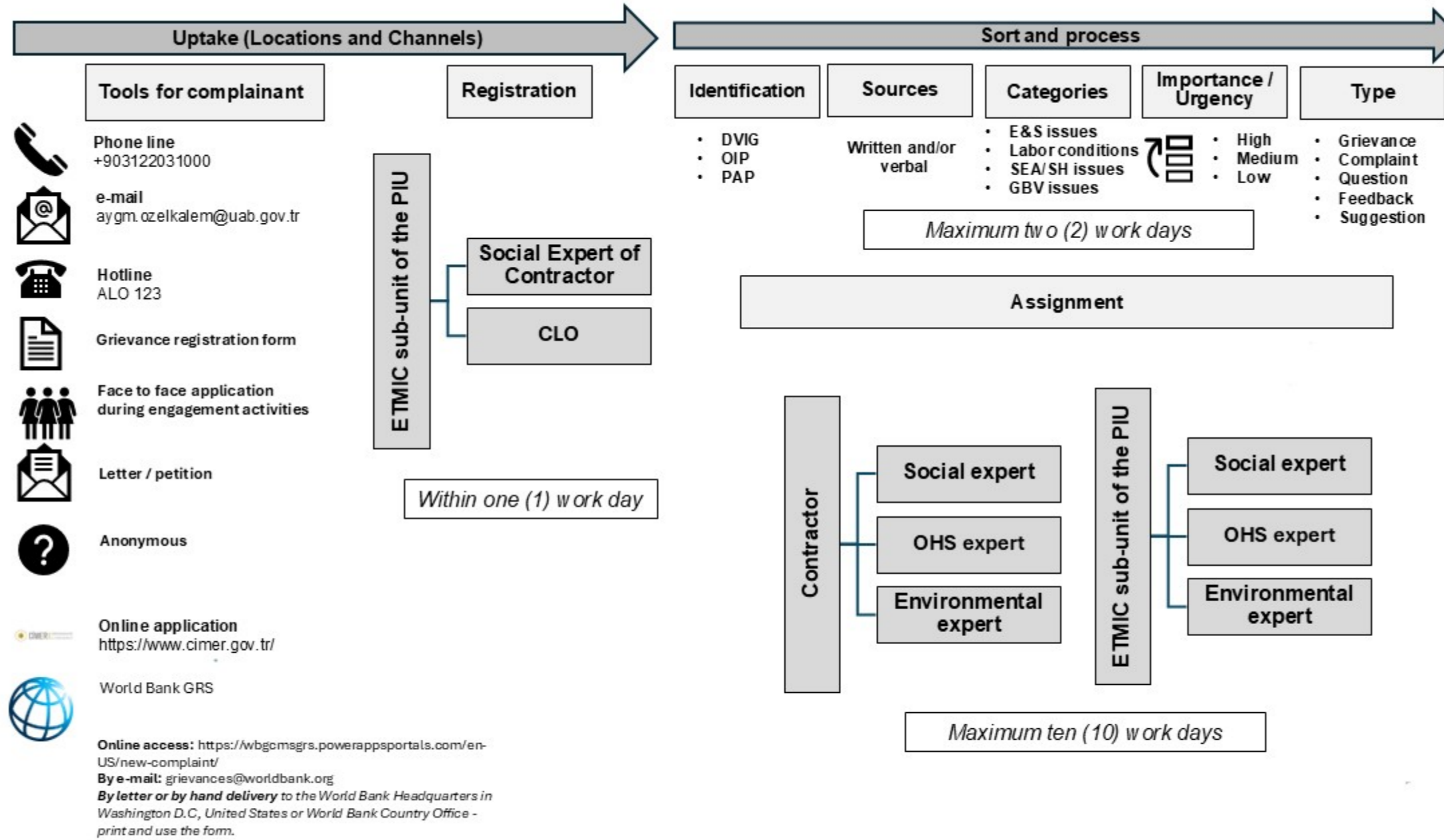
- All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.
- Criminal cases will be referred to the public prosecutor.

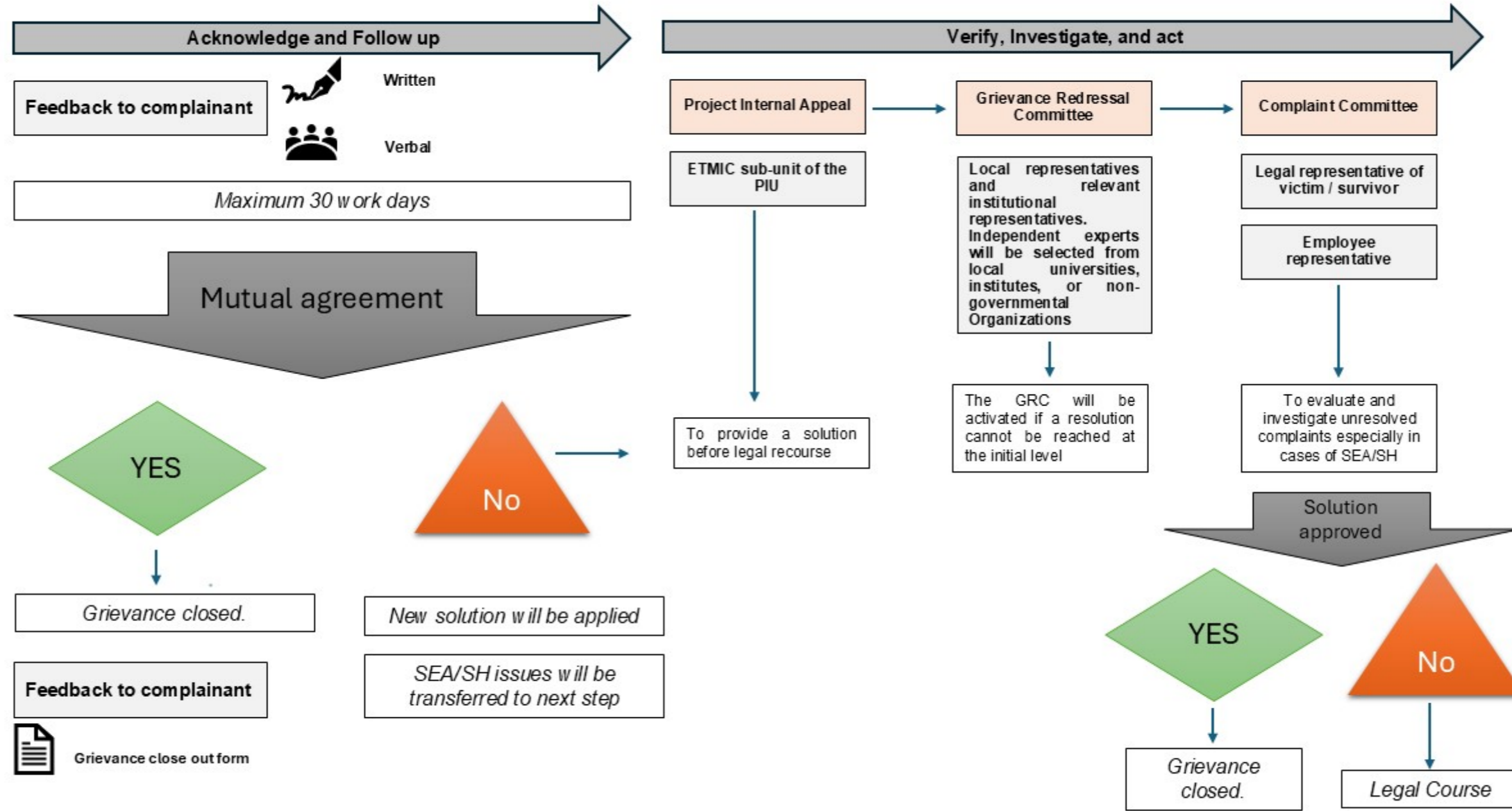
Handling grievances that are sensitive will be treated in full confidentiality. To enable female work force to safely access the WGM, labor trainings will include information on the various channels of the raising grievances and confidentiality of doing so. The gender specialist of the

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 39 / 64

ETMIC sub-unit of the PIU will ensure that contractors provide such training to workers, and to train contractors on how to collect grievances confidentially.

Türkiye already has a national referral system for SEA/SH, and workplace related harassment, bullying, and violence, and there are provisions in both the Labor Law and the Penal Code for this type of behavior that is deemed unacceptable. In addition, psycho-social support is also provided and available for survivors. When necessary, the social expert will refer the survivors to the Ministry of Family and Social Services call center (ALO 183) for SEA/SH, and to the Ministry of Labor and Social Security call center (ALO 170) for workplace-based psychological harassment-mobbing, violence, and bullying, etc. and will have in place mechanisms for confidential reporting with safe and ethical documenting of issues.





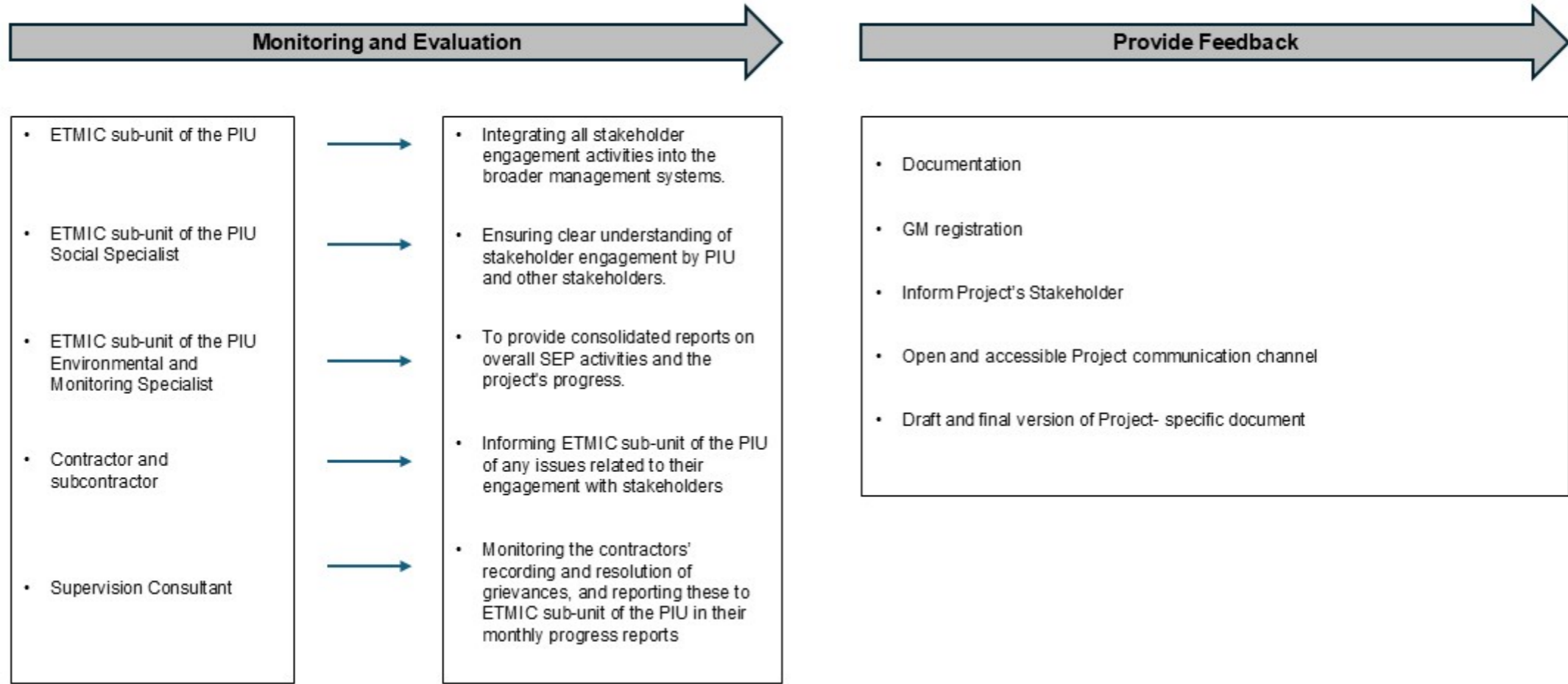


Figure 4: Grievance Redress Service

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 43 / 64

7.4 GM contact information

Presidency's Communication Center (CIMER)

CIMER serves as a platform for citizens to report various issues, lodge complaints, and make requests. CIMER has been actively utilized by citizens since its inception. This system operates through dedicated software and a web page developed by the Presidential Department of Communications, facilitating communication between citizens and the government, allowing applications to be submitted at any time and from anywhere.

In addition to its general use, the CIMER system will also be employed at the Project level to receive and address complaints from individuals affected by the Project or other concerned parties. As per the Right to Information Act, every individual has the right to access information, following the procedures and principles outlined in written regulations. This can be done by submitting a written request through the Right to Petition or online at <https://www.icisleri.gov.tr/bilgi-edinme>.

Foreigners Communication Center (YİMER)

The Republic of Türkiye Ministry of Interior, under the Presidency of Migration Management, is committed to providing accurate, rapid, and reliable information in accordance with the law 24/7 through YİMER 157 and other service channels for those seeking assistance. YİMER 157 provides continuous assistance to foreigners 24/7, 7 days a week, helping them with questions related to visas, residence permits, international protection, temporary protection, and more. It plays a crucial role in identifying victims of human trafficking and conducting rescue operations for those affected by migrant smuggling at sea. YİMER 157 serves as a lifeline for foreigners, aiming to be their primary source for information and assistance, accessible both within Türkiye and abroad.

World Bank Grievance Redress Service

The World Bank is an additional significant project stakeholder with its own established mechanisms for addressing complaints. To provide stakeholders with alternative channels for accessing this institution's complaint resolution processes, the following contact details can also serve as an additional avenue for submitting complaints.

World Bank (WB) Grievance Redress Service

- Online access: <https://wbgcmsgrs.powerappsportals.com/en-US/new-complaint/>
- By e-mail: grievances@worldbank.org
- By letter or by hand delivery to the World Bank Headquarters in Washington D.C, United States or World Bank Country Office -print and use the form.

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 44 / 64

8 MONITORING AND REPORTING

8.1 Monitoring Reports in the Course of the Project

In the role of the AYGM, a systematic monitoring process will be established for the Grievance Mechanism (GM). This approach involves the methodical collection of feedback from a diverse range of sources, including communities, local governmental bodies, other corporate entities, non-governmental organizations (NGOs), the media, academic institutions, and other interest groups. The effectiveness of this process will be ensured through purposeful consultations and the use of the Grievance Mechanism. If necessary, a comprehensive report summarizing all stakeholder engagement activities, including grievance tracking, will be compiled and presented to the relevant regulatory agency.

Additionally, the project owner pledges to maintain transparent communication channels with relevant stakeholders as dictated by the situation. Any newly identified stakeholders will be promptly added to the stakeholder list, with communication initiated accordingly. In the case of significant changes or updates to the project, the project owner will persist in addressing and disseminating information about environmental and social concerns to the relevant stakeholders. Notifications regarding improvements, upgrades, and issues related to the environment and society will be conveyed promptly following the procedures outlined in this SEP.

The SEP, which delineates the project's social and environmental framework, will undergo periodic revisions, especially when significant changes to the project occur. These revisions will provide concise summaries of concerns, issues, and inquiries that have arisen over the past year, along with details about any deviations from the initially planned activities or events.

8.2 Involvement of Stakeholders in Monitoring Activities

Table 9 has been crafted to outline the key performance indicators (KPIs) and designates the responsible parties tasked with overseeing this endeavor.

KPI-01 entails comprehensive recording and analysis of all written and verbal feedback, including anonymous complaints, alongside documentation of open and closed complaint numbers, actions taken for closed complaints, and efforts to reduce open complaints. Additionally, it involves recording minutes of meetings, capturing photographs if permissions are granted, maintaining grievance logs, reviewing documentation, and evaluating social compliance conditions of project implementations. KPI-02 involves the appointment of Community Liaison Officers (CLOs), including female CLOs, the assignment of grievances to relevant departments, and the institution of a PR office on-site. KPI-03 focuses on the meticulous recording of all written and verbal feedback, including anonymous complaints. Lastly, KPI-04 revolves around the monitoring of contractor activities engaged in grievance management.

Table 9. Monitoring Plan

Description		Requirements	Items Used for Monitoring	Target	Threshold Value	Project Phase and Frequency		Responsible Party
KPI-01	<p>The recording of all written and verbal feedback</p> <p>The records also include anonymous complaints.</p> <p>The records show both open and closed complaint numbers.</p> <p>Recording the actions taken for closed complaints in the records.</p> <p>Record minutes of meetings (MoM), and trainings (date, subject, number of participants)</p> <p>Photographs (if permissions obtained)</p> <p>Grievance Logs</p> <p>Review of documentation</p> <p>Evaluation of social compliance conditions of Project implementations</p>	<p>Constitution of Project specific GM</p> <p>Constitution of Project specific Worker's GM</p> <p>Preparation of complaint forms</p> <p>Evaluation of registration in Worker's GM</p>	<p>Routine site visits</p> <p>Random face to face interviews with stakeholders</p> <p>Focus group discussion with vulnerable groups</p> <p>Remote consultations with vulnerable groups</p>	<p>Grievances resolved in time and in mutually satisfactory manner</p> <p>Effective and satisfactory resolution of all received complaints</p> <p>Reducing the number of open complaints</p> <p>Implementation of targeted consultations</p> <p>High level of public participation</p> <p>Increase in participation rate of vulnerable participants</p>	<p>100% achievement on resolved grievances</p> <p>More than 50% of the participants as women.</p> <p>More than 10% of the participants as vulnerable groups.</p> <p>48 public consultation meetings will be conducted at settlement level located around the stations</p> <p>144 mukhtar meetings will be conducted at settlement level located around the railway line</p>	Once prior to project activities	Land preparation and construction	ETMIC sub-unit of the PIU Supervision consultant
KPI-02	<p>Appointment of Community Liaison Officer (CLO)</p> <p>Appointment of female CLO</p> <p>Assignment of grievances to relevant departments</p>	<p>Ensure proper staff for stakeholder engagement including vulnerable groups</p>	<p>Regular meetings with CLOs</p>	<p>All provisions given in the SEP will be implemented and recorded.</p> <p>All grievances will closed-out within the target timeframe.</p>	<p>100% achievement on resolved grievances</p>	Continuous	Pre-Construction	ETMIC sub-unit of the PIU Supervision consultant
					Weekly	Construction		
					Monthly	Operation		

STAKEHOLDER ENGAGEMENT PLAN

CNR-ETMIC-SEP-001

Final

10.12.2024

Page 46 / 64

Description		Requirements	Items Used for Monitoring	Target	Threshold Value	Project Phase and Frequency		Responsible Party
KPI-03	The recording of all written and verbal feedback The records also include anonymous complaints.	Constitution of accessible communication tools in any kind Considering language-based handicaps for any kind communication techniques Considering non-Turkish speaker individuals at locations where people who predominantly speak languages other than Turkish live or travel Providing a living document form used in disclosure process Institution of PR office on-site Conducting stakeholder consultations	Routine site visits Random face to face interviews with stakeholders Focus group discussion with vulnerable groups Remote consultations with vulnerable groups	All provisions given in the SEP will be implemented and recorded. All grievances will closed-out within the target timeframe.	100% achievement on resolved grievances	Continuous Weekly Monthly	Pre-Construction Construction Operation	ETMIC sub-unit of the PIU Supervision consultant
KPI-04	Monitoring of contractor's activities engaged in GM	Ensure monitoring of contractor's activities	Regular meetings with CLOs Regular meetings with social specialists of PMU, PIU, Contractor and Supervision consultant	All provisions given in the SEP will be implemented and recorded. All grievances will closed-out within the target timeframe.	100% achievement on resolved grievances	Monthly Quarterly Semi Annual	Pre-Construction Construction Operation	ETMIC sub-unit of the PIU Supervision consultant

STAKEHOLDER ENGAGEMENT PLAN		CNR-ETMIC-SEP-001
Final	10.12.2024	Page 47 / 64

8.3 Reporting Back to Stakeholder Groups

The SEP will undergo regular updates as deemed necessary throughout the project. Team members responsible for this task will compile periodic reports on stakeholder complaints and inquiries, detailing the status of corrective actions. These reports, whether on a quarterly basis or at other intervals, will assist in evaluating the number and nature of issues and the project's effectiveness in addressing them. Information about the project's public engagement activities will be communicated to stakeholders through various channels as required.

Appendix-1 Registration Form

GRIEVANCE FORM			
Reference No (to be filled by institution)			
Personal Information <i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information. Personal information will be used to identify if there exist special circumstances with respect to your grievance and it will be stored and processed according to Personal Data Protection Law No. 6698. You can choose to fill partly or not to fill.</i>			
Identity Number		Full Name	
Province		District	
Neighborhood/Village		Locality	
Preferred way of communication , (Please provide your contact details: mail address, e-mail address, telephone number, etc. in you would like to be informed about the resolution process, actions to be taken)			
Grievance			
Your proposal for solution (if any)			
Signature		Date	

Appendix-2 Closeout Form

GRIEVANCE CLOSEOUT FORM	
Grievance closeout number:	
Reference No of the Grievance	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	[] YES [] NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and/or his/her complaint has been remediated.

Full Name	Signature
Date	

Of the Complainant:

Full Name	Signature
Date	

Appendix-3: World Bank Standards and Key Gaps with the National Framework

National Framework	WB ESS	Key Gaps Between WBG ESSs and Turkish Legislation	Measures to fill the gaps
<p>National EIA Legislation According to the national EIA Regulation, projects are categorized as Annex I and Annex II projects, primarily based on the size or capacity of the planned investment rather than associated risks and impacts, and projects are classified according to these two categories.</p>	<p>ESS1: Assessment and Management of Environmental and Social Risks and Impacts Identifying, evaluating, and managing the project's environmental and social risks and impacts. Implementing measures and inclusive opportunities for disadvantaged and vulnerable populations. Adhering to national regulations and methodologies grounded in environmental and social considerations.</p>	<p>In ESS1, it is observed that social impact, along with environmental impact, is evaluated within the project scope, whereas in Turkish legislation, social impact assessment has only recently begun to be incorporated into the EIA process in more detail. In the national legislation, the EIA Regulation published in the Official Gazette dated 29.07.2022 and numbered 31907 aims to increase efforts in socially focused areas, such as the Stakeholder Engagement Plan, and to expand social impact assessment.</p>	<p>Providing stakeholders with information regarding environmental and social risks during the construction and operational phases. Developing diverse communication methods and tailored approaches for informing vulnerable groups, including women, poor individuals, and those with disabilities. Meeting the stipulated obligations outlined in Article 9 of the "Public Information and Engagement Process" within the National EIA Regulations.</p>
<p>The Occupational Health and Safety Law No. 6331 The Occupational Health and Safety Law No. 6331 and its related regulations encompass risk assessment regarding occupational health and safety in workplaces. The renewal of this assessment is subject to certain conditions outlined in the regulation. Additionally, emergencies are limited to the workplace. Furthermore, environmental accidents and social accidents are defined in different regulations.</p> <p>Labor Law In national legislation, workers under the age of eighteen (18) are divided into two categories: child workers (individuals who have completed the age of 14 but have not yet completed the age of 15 and have finished primary education)</p>	<p>ESS2: Labor and Working Conditions Fostering workplace safety and health. Ensuring equitable and inclusive treatment, establishing a fair and equal environment for all project workers. Safeguarding the rights and well-being of migrant workers, contracted workers, social workers, as well as disadvantaged and vulnerable project workers, including women and disabled individuals, across the entire supply chain. Prohibiting the use of forced labor and child labor in any form. Upholding the right to organize and enter into labor agreements, in accordance with national laws. Providing tools and mechanisms for project workers to express and address work-related concerns.</p>	<p>In Turkish legislation, there is no provision for providing tools and mechanisms for project workers to express and address work-related concerns.</p>	<p>Training internal stakeholders in occupational health and safety. Ensuring fairness in recruitment announcements and working conditions. Establishing codes of conduct and promoting awareness in this regard. Involving all internal stakeholders in the process of education, information, and engagement during construction and operation phases. Promoting awareness and providing information to all internal stakeholders about the prevention of forced labor and child labor during construction and operation phases. Promoting awareness and providing information to all internal stakeholders about workplace abuse and discrimination. Raising awareness and informing all internal stakeholders about sexual harassment and gender-based</p>

National Framework	WB ESS	Key Gaps Between WBG ESSs and Turkish Legislation	Measures to fill the gaps
and young workers (individuals who have completed the age of 15 but have not yet completed the age of 18). Child workers who have completed the age of 14 but have not yet completed the age of 15, young workers who have completed the age of 15 but have not yet completed the age of 18, and young workers who have completed the age of 16 but have not yet completed the age of 18 are categorized into three (3) groups, and their working conditions are specified.			discrimination in the workplace during construction and operation phases. Informing and empowering all internal stakeholders about the principles of freedom of association and labor agreements during construction and operation phases. Informing and facilitating access to the GM for all internal stakeholders during construction and operation stages.
No specific regulation	<p>ESS4: Community Health, Safety and Security</p> <p>Anticipating and preventing adverse effects on the health and safety of local communities throughout the project's lifecycle.</p> <p>Emphasizing quality, safety, and climate change considerations during the infrastructure design and construction phases.</p> <p>Reducing and controlling community exposure to traffic, diseases, and hazardous materials.</p> <p>Implementing effective measures for emergency response and management.</p> <p>Ensuring proper management that includes risk prevention and minimization for the well-being of staff and the properties of affected communities</p>	In national legislation, public health is addressed in a fragmented manner across different regulations.	Timely communication of environmental and social risks to stakeholders. Engaging in discussions regarding the mitigation of adverse impacts and the promotion of positive actions during the information-sharing process.
<p>Law on The Right to Information</p> <p>Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the</p>	<p>ESS10: Stakeholder Engagement and Information Disclosure</p> <p>Identifying the project's stakeholders. Assessing the degree of interest and support among stakeholders.</p>	ESS10 supports the use of a grievance mechanism, offering a proactive approach to social impact, whereas efforts in this area remain insufficient within Turkish legislation.	Project stakeholders, along with their levels of interest and support, are outlined in the Scope section. Ensuring stakeholders are promptly informed about environmental and social risks. Consultations with stakeholders regarding risk reduction and enhancing

National Framework	WB ESS	Key Gaps Between WBG ESSs and Turkish Legislation	Measures to fill the gaps
<p>necessities of a democratic and transparent government. Everyone has the right to information on the activities of the public institutions and the professional organizations, which qualify as public institutions.</p> <p>Right of petition, Right to Information and Appeal to the Ombudsperson</p> <p>Citizens and foreigner resident in Türkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye with regard to the requests and complaints concerning themselves or the public.</p>	<p>Taking into account the perspectives of stakeholders in environmental and social initiatives.</p> <p>Encouraging ongoing engagement with stakeholders throughout the project's lifecycle.</p> <p>Ensuring timely, clear, accessible, and appropriate disclosure of environmental and social risks and impacts to stakeholders.</p> <p>Offering accessible and inclusive mechanisms for raising concerns and grievances and ensuring their response and management.</p>		<p>positive actions are specified within the GM.</p>

Appendix-4: List of Stakeholder

Region	Stakeholder Group	Other Interested Parties (OIP)
		Name of Stakeholder
ARDAHAN	Governmental Institution	• Governorship of Ardahan
		• Ardahan Municipality
		• Çıldır Municipality
		• Çıldır Social Solidarity and Aid Association
		• Çıldır Village Services Union
		• Çıldır District Governorship
		• Çıldır District Special Administration
	Education	• Ardahan University Çıldır Vocational High School
		• Çıldır District Directorate of National Education
	Health	• Çıldır Healthcare Institutions
	Agriculture, Livestock and Fishery	• Çıldır District Directorate of Agriculture and Forestry
	Transportation	• General Directorate of Highways, Kars 18th Regional Directorate, 183rd Ardahan Branch, Çıldır Maintenance Center
		• AKTAS Border gate
	Development Agency	• Serhat Development Agency
	NGOs / Cooperatives and Unions	• Ardahan Beekeepers Union
		• Çıldır Irrigation Union
		• Federation of Çıldır Associations
		• Limited Liability Çıldır Fisheries Cooperative
	Companies	• Aras Electricity Distribution Inc.
• Pasifik Eurasia		
Media	• Kuzey Anadolu Gazetesi	
	• Ardahan TV	
Other	• Kuyucuk Bird Paradise	
KARS	Governmental Institution	• Governorship of Kars
		• Kars Municipality
		• Kars Cultural Heritage Protection Regional Board Director
		• Kars Organized Industrial Zone
		• Kars Provincial Directorate of Culture and Tourism
		• Kars Provincial Directorate of Environment, Urbanization, and Climate Change
		• 24th Directorate of DSİ Kars
		• TEDAŞ Operation Directorate
		• Arpaçay District Governorship
		• Arpaçay Municipality
		• Arpaçay District Special Administration
		• Arpaçay Rural Service Delivery Union
		• Sarıkamış District Governorship
		• Sarıkamış Municipality
		• Sarıkamış District Special Administration
		• Sarıkamış District Police Department
		• Sarıkamış District Gendarmerie Command
		• Sarıkamış Deep Snow and Severe Cold Weather Combat Training Center Command
		• Selim District Governorship

Region	Stakeholder Group	Other Interested Parties (OIP)
		Name of Stakeholder
		• Selim District Special Administration
		• Selim Municipality
		• Selim Social Solidarity and Aid Foundation
	Education	• Kars Provincial Directorate of National Education
		• Kars Kafkas University
		• Arpaçay District Directorate of National Education
		• Sarıkamış District Directorate of National Education
		• Kafkas University Sarıkamış School of Physical Education and Sports
		• Kafkas University Sarıkamış Vocational School
		• Sarıkamış Public Education Center
		• Yeniköy Orhan Yavuz Primary School
		• Halitpaşa Primary School
		• Selim District Directorate of National Education
		• Selim Public Education Center
		• Benliahmet Şehit Öğretmen Taşkın Senger Primary School
		• Benliahmet Şehit Öğretmen Taşkın Senger Secondary School
		• Dikme Hacı Yasemen Yılmazel Primary School
		• Dikme Hacı Yasemen Yılmazel Secondary School
	Health	• Kars Regional Training and Research Hospital
		• Kars Provincial Health Directorate
		• Arpaçay District Health Group Presidency
		• Arpaçay State Hospital
		• Sarıkamış District Directorate of Health
		• Kars Sarıkamış CHC Yeniköy Health House
		• Selim District Health Group Presidency
		• Selim District CHC
		• Benliahmet Health House
	Agriculture, Livestock and Fishery	• Kars Provincial Directorate of Agriculture and Forestry
		• Arpaçay District Directorate of Agriculture and Forestry
		• Arpaçay Chamber of Agriculture Presidency
		• Sarıkamış Forest Management Directorate
		• Sarıkamış Agricultural Products Office (TMO)
		• Selim District Directorate of Agriculture and Forestry
		• Selim Chamber of Agriculture
	Transportation	• Directorate General of TCDD, Railway Maintenance Directorate, Kars 47th Branch
		• Kars 18th Regional Directorate of State Highways
	Energy	• Aras Electric Distribution Facility Management
		• Aras Elektrik A.Ş. General Directorate
		• Baku-Tbilisi Kars line
		• BOTAŞ Branch Directorate
		• Kars Logistics Center
		• TEDAŞ ARAS Regional Directorate
• TEİAŞ 15th Regional Directorate		
• The Baku-Tbilisi-Ceyhan Pipeline		

Region	Stakeholder Group	Other Interested Parties (OIP)
		Name of Stakeholder
	Development Agency	• Trans-Anatolian Natural Gas Pipeline Project
		• Serhat Development Agency
	NGOs / Cooperatives and Unions	• Arpaçay Irrigation Cooperative
		• Arpaçay Sugar Beet Cooperative
		• Kars Arpaçay Associations Federation
		• Benliahmet Equestrian Sports Club
	Media	• Hacı Ayşe Cultural Center
		• Kars Hakimiyet Gazetesi
	Other	• Serhat TV
		• Arpaçay Kütük Ev (Restaurant)
ERZURUM	Governmental Institution	• Governorship of Erzurum
		• Erzurum Metropolitan Municipality
		• Erzurum Provincial Directorate of Culture and Tourism
		• Erzurum Eastern Anatolia Project (DAP) Regional Development Administration Presidency
		• 8th Directorate of DSI Erzurum
		• Erzurum Provincial Directorate of Agriculture and Forestry
		• Aziziye District Governorship
		• Aziziye Municipality
		• Aşkale District Directorate of Planning and Urbanization
		• Aşkale Police Department
		• Aşkale District Governorship
		• Horasan District Governorship
		• Horasan Municipality
		• Horasan District Gendarmerie Command
		• Horasan District Police Department
		• Köprüköy District Governorship
		• Köprüköy Municipality
		• Köprüköy District Gendarmerie Command
		• Köprüköy District Police Department
		• Palandöken District Governorship
		• Palandöken Municipality
		• Palandöken District Gendarmerie Command
		• Palandöken District Police Department
		• Pasinler District Gendarmerie Command
		• Pasinler District Governorship
		• Pasinler Municipality
		• Pasinler District Police Department
	Education	• Aşkale District National Education Directorate
		• Aziziye District National Education Directorate
		• Atatürk University Horasan Vocational School
		• Horasan District National Education Directorate
		• Horasan Boarding Regional Middle School
		• Köprüköy District National Education Directorate
		• Köprüköy High School
• Palandöken District National Education Directorate		

Region	Stakeholder Group	Other Interested Parties (OIP)		
		Name of Stakeholder		
		•	Pasinler District National Education Directorate	
		•	Atatürk University Pasinler Vocational School	
		•	Yakutiye District National Education Directorate	
		•	Ilıca Borsa İstanbul Yavuz Selim Social Sciences High School	
		•	Ilıca Kindergarten	
		•	Ilıca Multiprogram Anatolian High School	
		•	Ilıca Toprakkale Ziyaettin Özatalay Primary School	
		•	Ilıca Toprakkale Ziyaettin Özatalay Middle School	
		•	Kemaleddin Horasani Elementary School	
		•	Uzunahmet Kindergarten	
	Health	•	Horasan State Hospital	
		•	Pasinler District Public Health Center	
		•	Aşkale Family Health Center	
		•	Horasan District Health Directorate	
		•	Aşkale Kandilli Family Health Center	
		•	Aşkale District State Hospital	
		•	Erzurum Ilıca Family Health Center	
		•	İbrahim Hakkı State Hospital	
		•	Köprüköy District Health Directorate	
		•	Köprüköy District Integrated Hospital	
	Agriculture, Livestock and Fishery	•	Pasinler District CHC	
		•	Köprüköy State Hospital	
		•	Pasinler District Health Directorate	
		•	Aziziye District Directorate of Agriculture and Forestry	
		•	Köprüköy District Directorate of Agriculture and Forestry	
		•	Palandöken District Agriculture and Forestry Directorate	
	Transportation	•	Pasinler Chamber of Agriculture	
		•	Pasinler District Agriculture and Forestry Directorate	
		•	Pasinler TMO	
	Energy	•	Erzurum Provincial Administration Horasan Maintenance Centre	
		•	General Directorate of Highways, Erzurum 122nd Branch, Horasan Maintenance Centre	
	Development Agency	•	Erzurum 12th Regional Directorate of State Highways	
		•	Erzurum BOTAŞ Natural Gas Transmission IV. Regional Directorate	
	Factories	•	Erzurum TEİAŞ 15th Regional Directorate	
		•	Palen Doğal Gaz	
	Media	•	KUDAKA Northeast Anatolia Development Agency	
		•	ABS Plaster Factory	
	ERZINCAN	Governmental Institution	•	Aşkale Cement Factory
			•	TurkMag
			•	Haber 25 Gazetesi
		•	Kanal 25	
		•	Çadirkaya Municipality	
		•	Çayırlı District Governorship Social Solidarity and Aid Foundation	
		•	Çayırlı District Special Provincial Administration Directorate	

Region	Stakeholder Group	Other Interested Parties (OIP)	
		Name of Stakeholder	
		• Cultural Heritage Protection Directorate	
		• Çayırlı Municipality	
		• Eriç Gendarmerie Command	
		• Erzincan Governorship Social Solidarity and Aid Foundation	
		• Erzincan Municipality	
		• Governorship of Erzincan	
		• Tanyeri Gendarmerie Station Command	
		• Kemah District Governorship	
		• Kemah Municipality	
		• Kemah Social Assistance Association	
		• Tercan District Governorship	
		• Üzümlü District Governorship	
		• Üzümlü Municipality	
		• Alp Gendarmerie	
		• Üzümlü Social Solidarity and Aid Foundation	
		Education	• 23 Nisan Primary School
			• Altunkent Ömer Gültekin Primary School
			• Altunkent Ömer Gültekin Secondary School
	• Anagold Mining Middle School		
	• Aziz and Mehmet Torun Primary School		
	• Çadirkaya Imam Hatip Middle School		
	• Çadirkaya Multidisciplinary High School		
	• Çadirkaya Şehit Jandarma Binbaşı Ümit Çelik Middle School		
	• Çadirkaya Şehit Jandarma Binbaşı Ümit Çelik Primary School		
	• Çöpler Primary School		
	• Elmacık Primary School		
	• Erzincan Binali Yıldırım University		
	• Erzincan Binali Yıldırım University Kemah Vocational School		
	• Erzincan Binali Yıldırım University Tercan Vocational School		
	• Hacı Kamer Torun Kindergarten		
	• Iliç İbrahim Çeçen Imam Hatip Middle School		
	• Iliç Kindergarten		
	• Iliç Seyda Fırat Multi-Program High School		
	• Kemah İmam Hatip Middle School		
	• Kemah Sultan Melik Multi-Program Anatolian High School		
	• Kerer Primary School		
	• Mehmet Şemsettin Günaltay Primary School		
	• Mercan Multidisciplinary High School		
	• Mercan Primary School		
	• Necatibey Middle School		
	• Sabırlı Primary School		
	• Üzümlü District National Education Directorate		
Health	• Çadirkaya FHC		
	• Emergency Health Services Station		
	• Emergency Health Services Station No. 2		

Region	Stakeholder Group	Other Interested Parties (OIP)	
		Name of Stakeholder	
		<ul style="list-style-type: none"> Erzincan Provincial Health Directorate Erzincan Provincial Health Directorate Emergency Medical Services Chief Physician's Office Iliç District Health Group Presidency Iliç FHC Iliç State Hospital Kemah District State Hospital Mercan FHC Tercan FHC Tercan State Hospital Üzümlü FHC Üzümlü State Hospital 	
	Agriculture, Livestock and Fishery	<ul style="list-style-type: none"> Çayırılı Sugar Beet Growers' Cooperative Tercan District Agriculture Directorate 	
	Transportation	<ul style="list-style-type: none"> TCDD 442nd Track Maintenance Directorate Highways Tercan 16th Regional Directorate, 164th Branch TCDD Kemaliye Çaltı Logistics Directorate 	
	Energy	<ul style="list-style-type: none"> Aras Elektrik Company Bağıştaş-I Dam and HEPP Project Enerya Company 	
	Development Agency	<ul style="list-style-type: none"> KUDAKA 	
	Cemevi	<ul style="list-style-type: none"> Kemah Alevi Cultural Association Zeynal Karakoç Cem and Cultural Center 	
	Investments & Investors	<ul style="list-style-type: none"> Anagold Madencilik Bilfer Mining Çöpler Gold Mine Etüt Mining HESTAŞ Mining IC Holding Erzincan OIZ 	
	Media	<ul style="list-style-type: none"> Yeni Erzincan Gazetesi ERT Şah TV 	
	SİVAS	Governmental Institution	<ul style="list-style-type: none"> 19th Directorate of DSİ Sivas Divriği District Governorship Divriği Municipality Divriği Village Services Union Governorship of Sivas Sivas Municipality
		Education	<ul style="list-style-type: none"> Sivas Cumhuriyet University Sivas Cumhuriyet University Divriği Nuri Demirağ Vocational School Sivas Science and Technology University
		Transportation	<ul style="list-style-type: none"> Divriği Station Divriği Train Station Signaling and Electrification Chiefdom Sivas 16th Regional Directorate of State Highways
		Agriculture, Livestock and Fishery	<ul style="list-style-type: none"> Divriği Chamber of Agriculture
		Cemevi	<ul style="list-style-type: none"> Divriği Cemevi Cultural Center
		Media	<ul style="list-style-type: none"> Büyük Sivas Gazetesi

Region	Stakeholder Group	Other Interested Parties (OIP)
		Name of Stakeholder
TUNCELİ		<ul style="list-style-type: none">Kanal 58
	Governmental Institution	<ul style="list-style-type: none">Pülümür Municipality
	Agriculture, Livestock and Fishery	<ul style="list-style-type: none">Pülümür Beekeeping Cooperative
	Media	<ul style="list-style-type: none">Özgür Dersim Gazetesi
		<ul style="list-style-type: none">Dersim 62 TV

Directly Affected Parties on Settlements, Mukhtarship, Local Residents, and Disadvantaged / Vulnerable Individuals or Groups (DVIG) around the stations

	Province	District	Settlement	Population (2024)	Non-Turkish speaker individuals	Individual with handicaps	Elderly	Illiterate
1.	Ardahan	Çıldır	Yukarıcambaz	329	Yes, 2 households	Yes, 4 households	Yes, 4 households	Yes, 3 households
2.	Ardahan	Çıldır	Aşağıcambaz	208	Yes, 1 household	Yes, 1 household	Yes, 5 households	Yes, 1 household
3.	Erzincan	Kemah	Eriç	40	No	No	Yes, 1 household	Yes, 1 household
4.	Erzincan	Kemah	Çarşı	1,106	Yes, 5 households	Yes, 1 household	Yes, 2 households	Yes, 4 households
5.	Erzincan	Kemah	Alpköy	67	No	No	No	No
6.	Erzincan	Kemah	Akyünlü	39	No	No	No	No
7.	Erzincan	Central	Çarşı	2,512	Yes, 3 households	Yes, 1 household	Yes, 4 households	Yes, 2 households
8.	Erzincan	Üzümlü	Büyük Kadağan	134	Yes, 1 household	No	Yes, 2 households	Yes, 1 household
9.	Erzincan	Üzümlü	Fırat	225	No	No	Yes, 1 household	Yes, 1 household
10.	Erzincan	Üzümlü	İstasyon	276	No	No	Yes, 1 household	No
11.	Erzincan	Üzümlü	Küçük Kadağan	242	No	Yes, 1 household	Yes, 1 household	No
12.	Erzincan	Üzümlü	Pınarbaşı	514	Yes, 2 households	Yes, 4 households	Yes, 1 household	Yes, 1 household
13.	Erzincan	Üzümlü	Süleymanlı	425	Yes, 1 household	Yes, 1 household	Yes, 2 households	No
14.	Erzincan	Üzümlü	Avcılar	142	Yes, 2 households	Yes, 1 household	Yes, 1 household	No
15.	Erzincan	Üzümlü	Bağlar	84	No	Yes, 1 household	Yes, 1 household	No
16.	Erzincan	Tercan	Kargın or İstasyon	2,131	No	No	Yes, 1 household	No
17.	Erzincan	Tercan	Akşemsettin	651	Yes, 1 household	Yes, 1 household	Yes, 2 households	Yes, 1 household
18.	Erzincan	Tercan	Atatürk	2,443	Yes, 4 households	Yes, 2 households	Yes, 1 household	Yes, 1 household
19.	Erzincan	Tercan	Camiikebir	692	Yes, 1 household	No	Yes, 1 household	Yes, 3 households
20.	Erzincan	Tercan	Gözeler	424	No	No	No	No
21.	Erzincan	Tercan	Yeni	541	No	No	No	No
22.	Erzincan	Çayırlı	Çataksu	165	No	No	No	No
23.	Erzurum	Aşkale	Saptıran	148	No	No	Yes, 2 households	
24.	Erzurum	Aşkale	Üç Mart	483	No	No	No	Yes, 1 household
25.	Erzurum	Aşkale	İstasyon	2,027	Yes, 1 household	Yes, 3 households	Yes, 1 household	Yes, 4 households
26.	Erzurum	Aşkale	Kandilli	894	Yes, 1 household	Yes, 1 household	Yes, 3 households	Yes, 1 household
27.	Erzurum	Aziziye	Çiğdemli	475	No	No	No	
28.	Erzurum	Aziziye	İlica	8,002	Yes, 15 households	Yes, 18 households	Yes, 14 households	Yes, 10 households
29.	Erzurum	Yakutiye	Nearby neighborhood including Ömer Nasuhi Bilmen	29,254	Yes, 25 households	Yes, 34 households	Yes, 19 households	Yes, 9 households
30.	Erzurum	Palandöken	Uzunahmet	165	No	No	No	No
31.	Erzurum	Pasinler	Çöğender	559	No	No	No	Yes, 3 households
32.	Erzurum	Pasinler	Kethuda	866	Yes, 1 household	Yes, 1 household	Yes, 1 household	Yes, 1 household
33.	Erzurum	Köprüköy	Şehitler	1,033	Yes, 5 households	Yes, 6 households	No	No
34.	Erzurum	Horasan	Karaçuha	59	Yes, 1 household	Yes, 1 household	No	No
35.	Erzurum	Horasan	Esentepe	841	Yes, 2 households	Yes, 2 households	Yes, 1 household	Yes, 1 household
36.	Erzurum	Horasan	Hızırilyas	314	Yes, 2 households	Yes, 3 households	No	No
37.	Kars	Sarıkamış	Süngütaş	126	Yes, 1 household	Yes, 1 household	Yes, 1 household	Yes, 1 household
38.	Kars	Sarıkamış	Sırbasan	150	Yes, 1 household	Yes, 3 households	Yes, 1 household	No
39.	Kars	Sarıkamış	İstasyon	1,161	Yes, 2 households	Yes, 2 households	Yes, 3 households	Yes, 2 households
40.	Kars	Selim	Köprübaşı	574	Yes, 2 households	Yes, 2 households	No	No
41.	Kars	Selim	Benliahmet	645	Yes, 2 households	Yes, 1 household	Yes, 2 households	Yes, 2 households
42.	Kars	Central	Cumhuriyet	7,335	Yes, 13 households	Yes, 2 households	Yes, 6 households	Yes, 3 households
43.	Kars	Central	Hafızpaşa	2,581	Yes, 4 households	Yes, 2 households	Yes, 4 households	Yes, 2 households
44.	Kars	Arpaçay	Güvercin	306	Yes, 1 household	No	Yes, 3 households	Yes, 2 households

#	Province	District	Settlement	Population (2024)	Non-Turkish speaker individuals	Individual with handicaps	Elderly	Illiterate
45.	Kars	Arpaçay	Taşbaşı	188	Yes, 4 households	Yes, 5 households	Yes, 7 households	Yes, 3 households
46.	Sivas	Divriği	Gezey	18	No	No	No	No
47.	Sivas	Divriği	Güllübağ	771	Yes, 1 household	Yes, 2 households	Yes, 1 household	Yes, 1 household
48.	Tunceli	Pülümür	Yarbaşı	48	No	No	No	No

Indirectly Affected Parties on Settlements, Mukhtarship, Local Residents, and Vulnerable groups around the railway line

#	Province	District	Settlement	Population (2024)	Non-Turkish speaker	Individual with handicaps	Elderly	Illiterate
1.	Ardahan	Çıldır	Akçakale	202	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
2.	Ardahan	Çıldır	Damlıca	148	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
3.	Ardahan	Çıldır	Karakale	224	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
4.	Erzincan	Çayırlı	Doluca	29	Zazaki	3 individuals	Less than 10%	Less than 2%
5.	Erzincan	İliç	Atma	49	No	1 person	Less than 10%	Less than 2%
6.	Erzincan	İliç	Bağıştaş	86	No	4 individuals	More than 10%	Less than 2%
7.	Erzincan	İliç	Büyükköy	55	Kurdish	2 individuals	Less than 10%	Less than 2%
8.	Erzincan	İliç	Çaltı	411	Kurdish	5 individuals	Less than 10%	Less than 2%
9.	Erzincan	İliç	Çöpler	314	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
10.	Erzincan	İliç	İbrahim Çeçen	1,864	Kurdish	15 individuals	Less than 10%	Less than 2%
11.	Erzincan	İliç	Ortatepe	36	No	No	Less than 10%	Less than 2%
12.	Erzincan	İliç	Abdullahpaşa	1,044	Kurdish	4 individuals	Less than 10%	Less than 2%
13.	Erzincan	Kemah	Aşağı Gedik	52	Kurdish	2 individuals	Less than 10%	Less than 2%
14.	Erzincan	Kemah	Atma	75	No	No	More than 10%	Less than 2%
15.	Erzincan	Kemah	Beklimçay	72	Kurdish	3 individuals	Less than 10%	Less than 2%
16.	Erzincan	Kemah	Beşikli	61	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
17.	Erzincan	Kemah	Dedek	28	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
18.	Erzincan	Kemah	Göğüsbağı	612	No	1 person	Less than 10%	Less than 2%
19.	Erzincan	Kemah	Kayabaşı	46	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
20.	Erzincan	Kemah	Gökkaya	94	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
21.	Erzincan	Kemah	Koçkar	143	No	3 individuals	Less than 10%	Less than 2%
22.	Erzincan	Kemah	Koruyolu	23	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
23.	Erzincan	Kemah	Mermerli	211	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
24.	Erzincan	Kemah	Muratboynu	85	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
25.	Erzincan	Kemah	Oğuz	93	Kurdish, Zazaki	1 person	Less than 10%	Less than 2%
26.	Erzincan	Kemah	Olukpınar	73	No	2 individuals	Less than 10%	Less than 2%
27.	Erzincan	Kemah	Yastıktepe	144	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
28.	Erzincan	Central	Beşsaray	402	No	6 individuals	Less than 10%	Less than 2%
29.	Erzincan	Central	Gani Efendi Çiftliği	267	Kurdish	4 individuals	Less than 10%	Less than 2%
30.	Erzincan	Central	Oğlaktepe	184	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
31.	Erzincan	Central	Pekmezli	29	No	1 person	More than 10%	Less than 2%
32.	Erzincan	Central	Cemal Gürsel	245	Kurdish, Zazaki	8 individuals	Less than 10%	Less than 2%
33.	Erzincan	Central	Ulalar	4,242	Kurdish, Zazaki	30 individuals	Less than 10%	Less than 2%
34.	Erzincan	Kemah	Küplü	118	No	1 person	More than 10%	Less than 2%
35.	Erzincan	Kemah	Sürek	43	No	No	More than 10%	Less than 2%
36.	Erzincan	Central	Barış	829	Kurdish, Zazaki	20 individuals	Less than 10%	Less than 2%
37.	Erzincan	Central	Karadığın	388	Kurdish, Zazaki	2 individuals	More than 10%	Less than 2%
38.	Erzincan	Central	Söğütözü	148	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
39.	Erzincan	Kemah	Uluçınar	42	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
40.	Erzincan	Kemah	Yahşılar	96	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION

#	Province	District	Settlement	Population (2024)	Non-Turkish speaker	Individual with handicaps	Elderly	Illiterate
41.	Erzincan	Central	Sancak	887	No	10 individuals	Less than 10%	Less than 2%
42.	Erzincan	Central	Şehit Cengiz Topel	1,497	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
43.	Erzincan	Central	Bayrak	469	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
44.	Erzincan	Tercan	Gökçe	151	No	2 individuals	More than 10%	Less than 2%
45.	Erzincan	Tercan	Köprübaşı	21	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
46.	Erzincan	Tercan	Yeşilyayla	139	No	2 individuals	Less than 10%	Less than 2%
47.	Erzincan	Üzümlü	Demirpınar	95	No	3 individuals	Less than 10%	Less than 2%
48.	Erzincan	Üzümlü	Derebük	16	Zazaki	2 individuals	Less than 10%	Less than 2%
49.	Erzincan	Üzümlü	Karakaya Köyü	567	No	2 individuals	Less than 10%	Less than 2%
50.	Erzincan	Tercan	Sucuali	41	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
51.	Erzincan	Tercan	Yollarüstü	184	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
52.	Erzincan	Üzümlü	Pelitli	55	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
53.	Erzincan	Üzümlü	Pişkıdağ	407	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
54.	Erzincan	Üzümlü	Denizdamı	32	No	4 individuals	Less than 10%	Less than 2%
55.	Erzurum	Aşkale	Altıntaş	49	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
56.	Erzurum	Aşkale	Dallı	47	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
57.	Erzurum	Aşkale	Demirkıran	55	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
58.	Erzurum	Aşkale	Karasu	29	No	1 person	Less than 10%	Less than 2%
59.	Erzurum	Aşkale	Pınakapan	83	Kurdish	2 individuals	Less than 10%	Less than 2%
60.	Erzurum	Aşkale	Şafak	1,325	Kurdish	10 individuals	Less than 10%	Less than 2%
61.	Erzurum	Aşkale	Sazlı	54	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
62.	Erzurum	Aşkale	Taşagıl	127	No	2 individuals	Less than 10%	Less than 2%
63.	Erzurum	Aşkale	Tecer	11	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
64.	Erzurum	Aşkale	Topalçavuş	290	No	2 individuals	Less than 10%	Less than 2%
65.	Erzurum	Aşkale	Küçükgeçit	252	No	1 person	Less than 10%	Less than 2%
66.	Erzurum	Aşkale	Çayköy	588	No	2 individuals	Less than 10%	Less than 2%
67.	Erzurum	Aşkale	Kıbrıs	1,033	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
68.	Erzurum	Köprüköy	Yapağılı	168	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
69.	Erzurum	Köprüköy	Yukarı Söğütlü	36	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
70.	Erzurum	Palandöken	Nene Hatun	313	Kurdish	3 individuals	Less than 10%	Less than 2%
71.	Erzurum	Yakutiye	Çiftlik	1,145	No	3 individuals	Less than 10%	Less than 2%
72.	Erzurum	Yakutiye	İstasyon	714	No	10 individuals	Less than 10%	Less than 2%
73.	Erzurum	Yakutiye	Müdüрге(Çayırtepe)	560	No	18 individuals	Less than 10%	Less than 2%
74.	Erzurum	Yakutiye	Soğukçermik(Soğucak)	440	No	3 individuals	Less than 10%	Less than 2%
75.	Erzurum	Aziziye	Alaca	260	No	1 person	Less than 10%	Less than 2%
76.	Erzurum	Aziziye	Atlıkonak	207	No	4 individuals	Less than 10%	Less than 2%
77.	Erzurum	Horasan	Camii Kebir	790	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
78.	Erzurum	Aziziye	Demirgeçit	306	No	1 person	Less than 10%	Less than 2%
79.	Erzurum	Horasan	Dalbaşı	164	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
80.	Erzurum	Pasinler	Alvar	801	No	6 individuals	Less than 10%	Less than 2%
81.	Erzurum	Pasinler	Çakırtaş	451	Kurdish	8 individuals	Less than 10%	Less than 2%
82.	Erzurum	Pasinler	Bahçelievler	1,344	Kurdish, Laz	10 individuals	Less than 10%	Less than 2%
83.	Erzurum	Pasinler	Büyüktüy	250	Kurdish	3 individuals	Less than 10%	Less than 2%
84.	Erzurum	Pasinler	Pusudere	77	No	2 individuals	Less than 10%	Less than 2%
85.	Erzurum	Pasinler	Şehit Burak Karakoç	221	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
86.	Erzurum	Pasinler	Yukarıdanışment	94	No	7 individuals	Less than 10%	Less than 2%
87.	Erzurum	Pasinler	Paşabey	826	Kurdish	3 individuals	Less than 10%	Less than 2%
88.	Erzurum	Horasan	Şerefiye	694	Kurdish	20 individuals	Less than 10%	Less than 2%
89.	Erzurum	Pasinler	Ebsemce	461	No	6 individuals	Less than 10%	Less than 2%

#	Province	District	Settlement	Population (2024)	Non-Turkish speaker	Individual with handicaps	Elderly	Illiterate
90.	Erzurum	Horasan	Azap	265	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
91.	Erzurum	Pasinler	Övenler	258	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
92.	Erzurum	Horasan	Çiftlik	132	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
93.	Erzurum	Horasan	Bulgurlu	635	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
94.	Erzurum	Pasinler	Üğümü	251	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
95.	Erzurum	Pasinler	Reşadiye	341	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
96.	Erzurum	Horasan	İnönü	1,401	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
97.	Kars	Arpaçay	Çanaksu	193	No	5 individuals	Less than 10%	Less than 2%
98.	Kars	Arpaçay	Aydınğün	222	No	4 individuals	Less than 10%	Less than 2%
99.	Kars	Arpaçay	Doğruyol	739	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
100.	Kars	Arpaçay	Göldalı	158	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
101.	Kars	Arpaçay	Gönülalan	159	No	4 individuals	Less than 10%	Less than 2%
102.	Kars	Arpaçay	Kakaç	92	No	2 individuals	Less than 10%	Less than 2%
103.	Kars	Arpaçay	Kümbet	310	No	3 individuals	Less than 10%	Less than 2%
104.	Kars	Arpaçay	Kuzgunlu	44	No	1 person	More than 10%	Less than 2%
105.	Kars	Arpaçay	Yenimahalle	836	Kurdish	12 individuals	Less than 10%	Less than 2%
106.	Kars	Central	Aydınlıkevler	3,036	No	6 individuals	Less than 10%	Less than 2%
107.	Kars	Central	Dikme	720	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
108.	Kars	Central	Halitpaşa	3,719	No	17 individuals	Less than 10%	Less than 2%
109.	Kars	Central	Karacaören	236	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
110.	Kars	Central	Karadağ	1,031	Kurdish	3 individuals	Less than 10%	Less than 2%
111.	Kars	Central	Ladikars(Kümbetli)	1,356	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
112.	Kars	Central	Mezra	367	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
113.	Kars	Central	Örnek	4,316	No	15 individuals	Less than 10%	Less than 2%
114.	Kars	Central	Yeni Mahalle	3,861	No	30 individuals	Less than 10%	Less than 2%
115.	Kars	Central	Paşacıyır	2,826	No	1 person	Less than 10%	Less than 2%
116.	Kars	Sarıkamış	Çatak	225	Kurdish	2 individuals	Less than 10%	Less than 2%
117.	Kars	Sarıkamış	Karaurgan	493	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
118.	Kars	Sarıkamış	Sırataşlar	55	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
119.	Kars	Sarıkamış	Yağbasan	228	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
120.	Kars	Sarıkamış	Yenigazi	501	Kurdish	4 individuals	Less than 10%	Less than 2%
121.	Kars	Selim	Çaybaşı	108	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
122.	Kars	Selim	Çarşı	2,635	Kurdish	10 individuals	Less than 10%	Less than 2%
123.	Kars	Selim	Cavlak	66	Kurdish	1 person	Less than 10%	Less than 2%
124.	Kars	Selim	Cumhuriyet	2,505	Kurdish	20 individuals	Less than 10%	Less than 2%
125.	Kars	Selim	Karaçayır	140	Kurdish	2 individuals	Less than 10%	Less than 2%
126.	Kars	Selim	Aşağıkotanlı	107	Kurdish	2 individuals	Less than 10%	Less than 2%
127.	Kars	Sarıkamış	Yeniköy	428	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
128.	Kars	Selim	Yolgeçmez	274	Kurdish	10 individuals	Less than 10%	Less than 2%
129.	Kars	Sarıkamış	Kurbançayır	224	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
130.	Kars	Selim	Yukarıkotanlı	140	Kurdish	3 individuals	More than 10%	Less than 2%
131.	Kars	Sarıkamış	Tepe	1,658	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
132.	Kars	Susuz	Çamçavuş	235	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
133.	Kars	Susuz	Cumhuriyet	262	Kurdish	2 individuals	Less than 10%	Less than 2%
134.	Kars	Susuz	Harmanlı	543	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
135.	Kars	Susuz	Porsuklu	385	No	5 individuals	Less than 10%	Less than 2%
136.	Kars	Susuz	Yolboyu	464	No	3 individuals	Less than 10%	Less than 2%
137.	Sivas	Divriği	Kalealtı	72	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
138.	Sivas	Divriği	Aşağıhamam	170	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION

#	Province	District	Settlement	Population (2024)	Non-Turkish speaker	Individual with handicaps	Elderly	Illiterate
139.	Sivas	Divriği	Çobandurağı	52	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
140.	Sivas	Divriği	Adatepe	97	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
141.	Sivas	Divriği	Oyuktepe	29	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
142.	Tunceli	Pülümür	Başkalecik	64	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
143.	Tunceli	Pülümür	Dağyolu	72	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
144.	Tunceli	Pülümür	Doğanpınar	188	Zazaki, Kurdish	3 individuals	Less than 10%	Less than 2%