REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE

AYGM
Altyapı Yatırımları Genel Müdürlüğü



FİLYOS PORT AND INDUSTRIAL ZONE RAILWAY CONNECTION PROJECT

RESETTLEMENT PLAN Addendum No:1

AYGM-ZNG-RP-AD NO:1

2026 August - Final

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1. Scope of the Addendum

This Resettlement Plan (RP) Addendum No. 1 covers all public lands and unregistered sections along the project alignment, categorized into three groups: (i) Treasury-owned parcels, (ii) Treasury-owned parcels located within the premises of the Turkish Petroleum Corporation (TPAO), and (iii) unregistered lands (cadastral gaps). In addition, Parcel No. 124/1, while leased to Tosyalı AŞ for a period of 49 years, remains legally classified as Treasury-owned land. As of the reporting date, the parcel is idle, no construction activities have been initiated, and no active use or investment by Tosyalı is observed. The AYGM Real Estate and Expropriation Unit will engage with Tosyalı A.Ş. regarding this parcel as part of the expropriation process.

The assessed areas consist of public lands (Treasury-owned) and unregistered land segments within the existing railway corridor, some of which fall outside the scope of expropriation and do not correspond to registered cadastral parcels. Field verification conducted for accessible areas confirmed that no land users, crops, trees, or livelihood-dependent assets were observed. The Treasury-owned parcels are located within an area previously declared as an industrial zone but currently remain idle and unused, with no evidence of informal land use.

The parcels located within the TPAO premises could not be accessed due to pending permissions; however, as these areas are situated within an active and controlled facility, no land acquisition or livelihood impacts are anticipated under ESS5. These areas will be assessed once access is granted, if required.

One abandoned (idle) structure was identified. As stated in the approved RP, it is not in use and falls outside the scope of expropriation. The structure is located within an area subject to collective expropriations carried out between 1998 and 2000 for the establishment of an industrial zone; however, due to unsuitable soil conditions and subsequent changes in state planning, both the land and the structures have remained unused for over 25 years.

In addition, one parcel (Parcel No. 105/43) is currently subject to ongoing litigation. The expropriation process for this parcel will be managed by the AYGM Real Estate and Expropriation Unit in accordance with the applicable national legislation and the relevant court decisions and also Project's Resettlement Plan (RP).

Accordingly, no land acquisition or physical or economic displacement arises under this Addendum. The eligibility framework and entitlement principles of the approved RP remain unchanged. An overview of the assessed areas is provided in three separate tables for Treasury-owned lands, TPAO-related lands, and unregistered areas.

Table 1 Information on Public Lands

No	Province	District	Settlement	Plot/Parcel	Land Size (m²)	Land Ownership Status	Date of Field Visit
1	Zonguldak Filyos	Çaycuma	Gökçeler	107/1	16601,20	Treasury Land	02-05.03.2026
2	Zonguldak Filyos	Çaycuma	Gökçeler	107/2	101939,92	Treasury Land	02-05.03.2026
3	Zonguldak Filyos	Çaycuma	Gökçeler	107/3	6586.09	Treasury Land	02-05.03.2026
4	Zonguldak Filyos	Çaycuma	Gökçeler	118/3	14614.65	Treasury Land	02-05.03.2026
5	Zonguldak Filyos	Çaycuma	Gökçeler	124/1[1]	8630,12	Treasury Land	02-05.03.2026
6	Zonguldak Filyos	Çaycuma	Gökçeler	124/2	10891,03	Treasury Land	02-05.03.2026

[1] Parcel 124/1 is owned by the Treasury. However, the parcel is currently leased to Tosyalı A.Ş. under a lease agreement executed with the relevant public authority. Accordingly, while legal ownership remains with the Treasury, Tosyalı holds the leasehold rights for the use of the land.

7	Zonguldak Filyos	Çaycuma	Gökçeler	125/1	1148,12	Treasury Land	02-05.03.2026
8	Zonguldak Filyos	Çaycuma	Gökçeler	135/4	34630,75	Treasury Land	02-05.03.2026
9	Zonguldak Filyos	Çaycuma	Gökçeler	168/1	67781.80	Treasury Land	02-05.03.2026
10	Zonguldak Filyos	Çaycuma	Gökçeler	327/1	8671,41	Treasury Land	02-05.03.2026

Table 2 Land subject to litigation

No	Province	District	Settlement	Plot/Parcel	Land Size (m²)	Land Ownership Status	Date of Field Visit
1	Zonguldak Filyos	Çaycuma	Gökçeler	105/43	2559,08	Land subject to litigation	02-05.03.2026

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Table 3 Information on Unregistred Parcels

No	Province	District	Settlement	Administrative Location	Land Size (m²)	Land Ownership Status	Date of Field Visit
1	Zonguldak Filyos	Çaycuma	Gökçeler -Sefercik	Km 0+000 – Km 1+500	29000	Unregistred Land	4.02.2026
2	Zonguldak Filyos	Çaycuma	Gökçeler -Sefercik	Km 1+500 – Km 2+500	60000	Unregistred Land	31.01.2026
3	Zonguldak Filyos	Çaycuma	Gökçeler -Sefercik	Km 2+600 – Km 3+400	30000	Unregistred Land	22.01.2026

Table 4 Treasury Lands in TPAO

No	Province	District	Settlement	Plot/Parcel	Land Size (m²)	Land Ownership Status	Date of Field Visit
1	Zonguldak Filyos	Çaycuma	Sazköy	126/1	43934,89	Treasury Land in TPAO	12.05.2026

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2	Zonguldak Filyos	Çaycuma	Sazköy	103/56	2825,26	Treasury Land in TPAO	12.05.2026
3	Zonguldak Filyos	Çaycuma	Sazköy	104/10	688,66	Treasury Land in TPAO	12.05.2026
4	Zonguldak Filyos	Çaycuma	Sazköy	104/11	794,57	Treasury Land in TPAO	12.05.2026
5	Zonguldak Filyos	Çaycuma	Sazköy	104/1	2634,82	Treasury Land in TPAO	12.05.2026
6	Zonguldak Filyos	Çaycuma	Sazköy	104/2	5019,43	Treasury Land in TPAO	12.05.2026
7	Zonguldak Filyos	Çaycuma	Sefercik	5596	4691,36	Treasury Land in TPAO	12.05.2026

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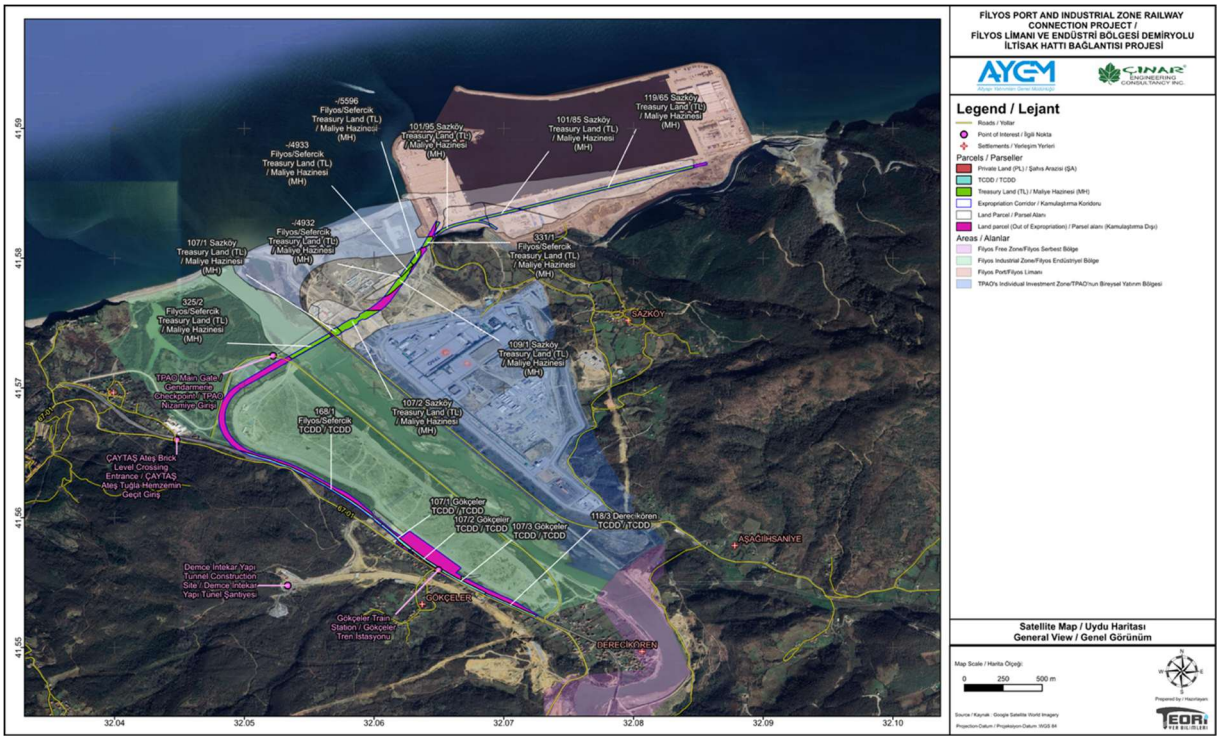
In addition, the geographical distribution of the Project alignment and the land segments assessed under this RP Addendum are presented in Figure 1 below. The figure illustrates the Filyos Port and Industrial Zone Railway Connection Line within Zonguldak Province, Çaycuma District. The sections marked in pink represent the unregistered areas that fall outside the scope of expropriation, as confirmed during field verification. These segments are located within the existing railway corridor and do not constitute registered cadastral parcels subject to land acquisition.

Figure 1 Geographic Distribution of the Project Alignment and Assessed Land Segments



Source: Prepared based on the approved Resettlement Plan (RP)

2. Detailed Parcel Information

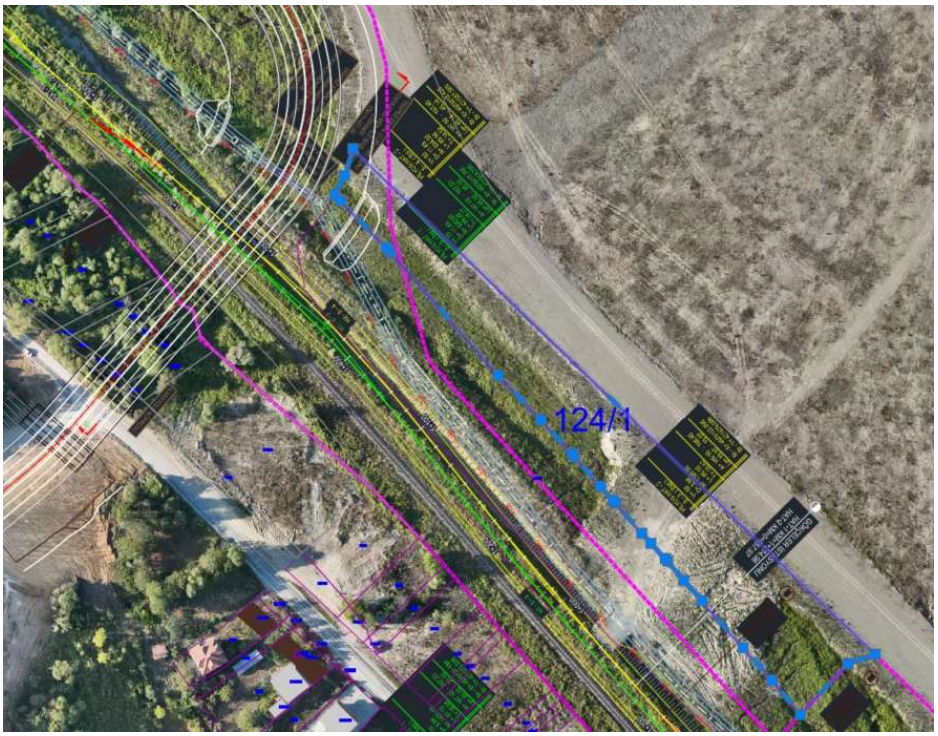
During cadastral and land registration works in Türkiye, certain areas were left unregistered under the legislation in force at the time. Although some were later registered through legal amendments, unregistered lands still exist today. These areas generally consist of public-use lands and do not have active parcel records in the land registry system. Where eligible for private ownership and of economic value, such lands may be registered in the name of the Treasury pursuant to Article 18 of Cadastre Law No. 3402.

Under RP Addendum No. 1, the alignment section in Zonguldak Province, Çaycuma District (Sefercik and Gökçeler), between Km 0+000 and Km 3+400, was assessed specifically with regard to three unregistered land segments (cadastral gaps) identified along the project corridor. These areas are located within the existing railway right-of-way and, by definition, do not correspond to registered cadastral parcels. As such, they fall outside the scope of formal land acquisition and expropriation processes.

Field verification confirmed that these unregistered areas are vacant public-use lands with no formal ownership records, and no informal land users, agricultural activities, or livelihood-dependent assets were observed. Within the Project's route, one concrete culvert located at KP1+825 will be reconstructed as part of the Project, and construction activities may result in temporary disturbance limited to the immediate work area. In addition, one idle structure located at KP0+500 will be fully demolished within the scope of the Project. This structure is situated within an area subject to collective expropriations carried out between 1998 and 2000 for the establishment of an industrial zone; however, due to unsuitable soil conditions and subsequent changes in state planning, both the land and associated structures have remained unused for over 25 years.

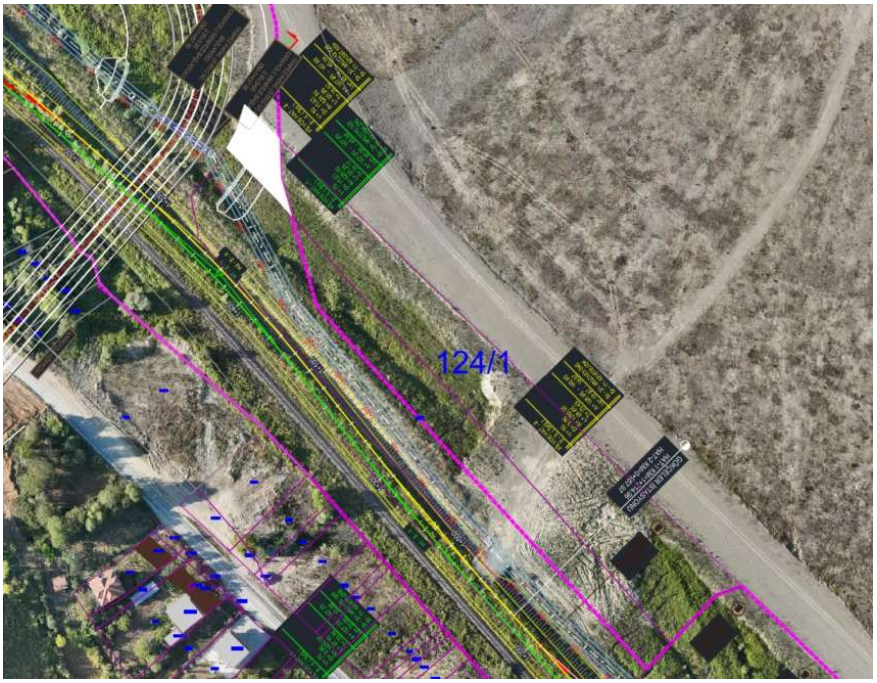
In addition, Parcel No. 124/1, which is located in proximity to the assessed alignment section, is leased to Tosyalı A.Ş. for a period of 49 years; however, the land remains legally classified as Treasury-owned. Field observations confirmed that the parcel is currently idle, with no active use, assets, or construction activities present. The parcel boundaries of Parcel No. 124/1 are presented in Figure 2 below.

Figure 2 Boundary of Parcel No. 124/1



It should be noted that expropriation requirements for Parcel No. 124/1 are limited to the section indicated with white hatching, as presented in Figure 3 below, while the remaining portion of the parcel will not be impacted by Project activities.

Figure 3 Section of Parcel No. 124/1 Subject to Expropriation (Indicated with White Hatching)



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Accordingly, no land acquisition, compensation, or livelihood restoration requirements arise within the scope of these unregistered areas. A summary of the findings is presented in Table 4 below. Further details and supporting explanations are provided in the relevant Land Appraisal Documents.

The Project affects one parcel under litigation, for which the expropriation process is being managed by the AYGM Real Estate and Expropriation Department. Figure 1 presents a satellite image of the Project area. The parcel under litigation (Parcel No. 105/43) is highlighted in purple, the public parcels within the Project footprint are shown in red, and the privately owned parcels are shown in blue.

Figure 4 Satellite Image of the Parcel 105/43

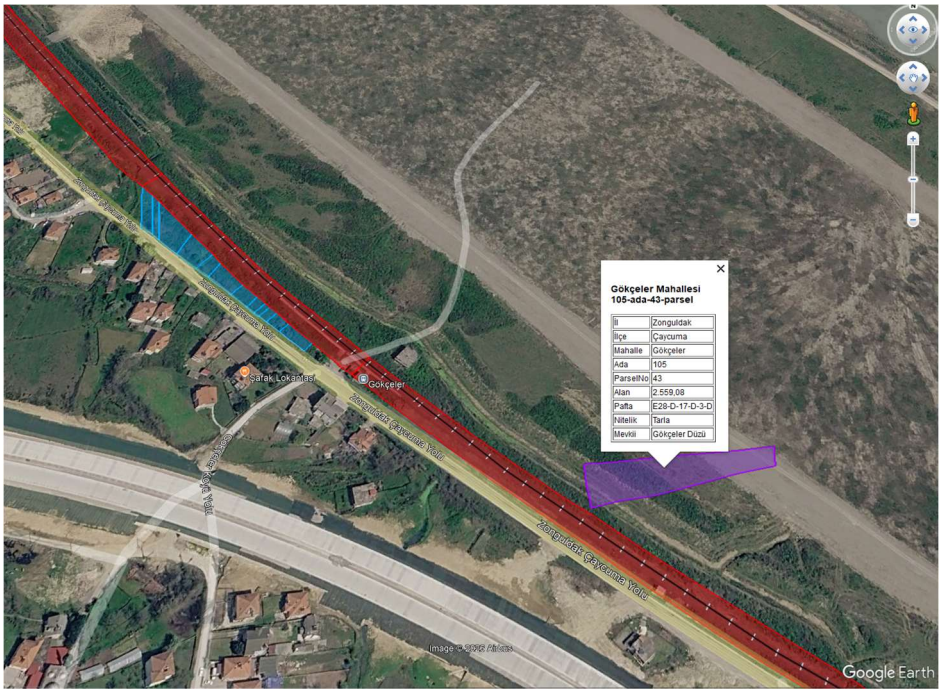

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Table 5 Summary of the Identified Structures on the Parcels and Status of their Use

No	Province	District	Settlement	Project-Related Location	Land Ownership Status	Land Owner Information	Informal Use Type	Impact Description	Utilities/ Structures	Assets information
1	Zonguldak Filyos	Çaycuma	Gökçeler	KP1+825	Unregistered Land	Treasury	None	Construction activities related to culvert replacement may result in temporary disturbance within the immediate work area.	1 Concrete Culvert	It is located on the existing railway line, which will be reconstructed under the scope of the Project and will continue to be utilized as a Project infrastructure asset.
2	Zonguldak Filyos	Çaycuma	Gökçeler	KP0+500	Unregistered Land	Treasury	None	The structure will be fully demolished within the scope of the project.	1 Idle Structure	The collective expropriations carried out between 1998 and 2000 to establish an industrial zone have remained unutilized for many years due to the incompatibility of the area's soil structure and subsequent changes in state planning for the region. As a result, both the land and the existing buildings have been left unused for over 25 years.

3. RP Consultations

Field assessments of the public lands and unregistered alignment sections in Zonguldak Province, Çaycuma District were conducted by the Contractor's Social, Environmental, and Survey Specialists under the supervision of DGII. The findings were submitted to DGII for review and have been incorporated into this RP Addendum. The Treasury-owned parcels located within the premises of the TPAO could not be visited at this stage due to pending access permissions and will be assessed once the required approvals are obtained.

The assessed sections consist of public lands (Treasury-owned) and unregistered areas (cadastral gaps) located within the existing railway corridor, some of which fall outside the scope of expropriation and do not correspond to registered cadastral parcels. In addition, Parcel No. 124/1 is leased to Tosyalı A.Ş. but remains legally classified as Treasury-owned land. No residential settlements, households, public institutions, or actively used structures are present. All identified are located within an area previously declared as an industrial zone but currently remain idle and unused, with no evidence of informal land use.

As no visible land use or occupancy was observed, the assessment was limited to on-site verification, and no stakeholder meetings or direct consultations were required. Field verification confirmed the absence of formal or informal users, agricultural activities, income-generating assets, and vulnerable PAPs. For the areas within the TPAO premises, no land acquisition or livelihood impacts are anticipated under ESS5, given that these areas are located within an active and controlled facility. Throughout the process, relevant stakeholders, including Tosyalı A.Ş., have been informed of the Project, and communication has been maintained as needed, including through formal and informal channels. It is also noted that the Project's camp area has been leased from Tosyalı A.Ş., indicating ongoing coordination with the company.

Accordingly, no resettlement-related consultation, compensation, or livelihood restoration measures are required under this Addendum. It is noted that the relevant parcel associated with Tosyalı A.Ş. is currently idle and not in active use. The company has been informed about the Project through ongoing communication and coordination, including interactions related to the leasing of the Project's camp area.

4. Affected Lands, Informal Users and Land Based Livelihoods

The sections assessed under this RP Addendum consist of public lands and unregistered land segments located within the existing railway corridor in Zonguldak Province, Çaycuma District, some of which fall outside the scope of expropriation. Within this context, the assessed areas have been categorized into three groups: (i) Treasury-owned parcels, (ii) Treasury-owned parcels located within the TPAO premises, and (iii) unregistered areas (cadastral gaps) that do not correspond to registered parcels.

Field verification conducted for accessible areas confirmed that no formal land ownership conflicts, informal land users, agricultural activities, trees, or livelihood-dependent assets are present. The Treasury-owned parcels are located within an area declared as an industrial zone in the past but currently remain idle and unused, with no evidence of informal use. This also applies to Parcel No. 124/1, which is leased to Tosyalı A.Ş. but is currently not in active use and shows no evidence of informal or economic activities.

The parcels located within the TPAO premises could not be accessed due to site access restrictions; however, as these areas are situated within an active and controlled facility, they are not expected to be subject to land acquisition or livelihood impacts under ESS5. These areas will be verified, if required, once access is granted.

Accordingly, the land is vacant and not used for residential, commercial, or livelihood purposes, and no affected lands, informal users, or land-based livelihoods have been identified under this Addendum.

5. Entitlement Matrix

The Entitlement Matrix presented under the approved RP in line with ESS5 remains applicable and unchanged under this RP Addendum, including the compensation provisions applicable to leaseholders where relevant. Parcel-level assessments confirmed that the identified unregistered sections located within the existing railway corridor fall outside the scope of expropriation and do not result in land acquisition, asset loss, or livelihood impacts. Accordingly, no PAPs are present and no compensation or livelihood restoration measures are triggered under this Addendum. An exception applies to a limited section of Parcel No. 124/1, which is owned by the Treasury and leased to Tosyalı and will be subject to expropriation. Any compensation or other entitlements arising from the leasehold interest, if applicable, will be provided in accordance with the provisions of the approved RP Entitlement Matrix and the relevant lease agreement. No additional entitlement categories are introduced under this RP Addendum.

6. Vulnerability Assessment

A vulnerability screening was conducted during field verification. As the assessed sections are vacant, public lands and unregistered areas with no identified land users or livelihood activities present, no vulnerable PAPs were identified. In this context, it is also noted that Parcel No. 124/1, although leased to Tosyalı A.Ş., is currently not in use and remains idle. Accordingly, no additional support measures are required under this Addendum. This finding is consistent with the current site conditions and will be re-evaluated in case of any changes during project implementation.

7. Budget and Compensations

As confirmed through parcel-level assessments, the identified public lands and unregistered area do not involve asset loss, or livelihood impacts. No PAPs are present within these areas. It is also noted that Parcel No. 124/1, leased to Tosyalı A.Ş., is currently idle and not in active use; therefore, no asset loss or livelihood impact is associated with this parcel, except for a limited section subject to expropriation. Accordingly, this RP Addendum does not require any compensation payments to informal users, livelihood restoration measures, or additional budget allocation is required under this RP Addendum.

Formal expropriation procedures for the lands leased to Tosyalı A.Ş. and the remaining 12 privately owned parcels within the Project scope will be carried out by the AYGM Real Estate and Expropriation Department in accordance with the applicable national legislation and project's Entitlement Matrix provided in the RP. The expropriation process and compensation arrangements for the remaining 12 privately owned parcels will be addressed under a separate RP Addendum.

8. Livelihood Restoration Plan

Parcel-level assessments conducted under this RP Addendum confirm that the identified public land and unregistered areas do not involve asset loss, or livelihood impacts. No land users, income-generating activities, or PAPs are present within the assessed areas. It is also noted that Parcel No. 124/1, leased to Tosyalı A.Ş., is currently idle and not in active use; therefore, no livelihood impacts are associated with this parcel. Accordingly, no Transitional Livelihood Support or livelihood restoration measures are required under this Addendum.

9. Grievance

No grievances or complaints have been received in relation to the assessed public land and unregistered areas covered under this RP Addendum. As no land users or PAPs have been identified within these areas, no grievances have arisen to date. This also applies to Parcel No. 124/1, leased to Tosyalı A.Ş., where no land use or related activities have been observed and no grievances have been submitted. The Project Grievance Mechanism remains operational and accessible in accordance with the approved RP; however, no grievances or submissions related to these sections have been recorded.

10. Project Documentation and Permitting Status

The assessed sections covered under this RP Addendum are public land and unregistered areas located within the existing railway corridor. All relevant project documentation remains consistent with the approved RP and applicable national legislation. No additional permitting requirements have arisen in connection with the sections assessed under this Addendum.

11.Conclusion

This Addendum covers all public lands located along the project alignment, which have been categorized into three groups: (i) 10 Treasury-owned parcels, (ii) 7 Treasury-owned parcels located within the Turkish Petroleum Corporation (TPAO) premises, and (iii) unregistered areas consisting of three separate sections.

Parcel-level field verification has been completed for accessible areas and confirmed that no formal or informal land users, trees, agricultural activities, or livelihood-dependent assets are present within the assessed sections. The Treasury-owned parcels are located in an area that was declared as an industrial zone many years ago but has remained idle and unused, with no evidence of informal land use. This also includes Parcel No. 124/1, which is leased to Tosyalı A.Ş. but remains idle and not in active use; only a limited portion of this parcel is subject to expropriation, with no associated asset loss or livelihood impact. Therefore, no land acquisition or livelihood impacts are anticipated.

The Treasury-owned parcels located within the TPAO premises could not be accessed due to pending site permissions; however, as these areas are situated within an active and controlled facility, no impacts in terms of ESS5 are anticipated. These areas will be subject to verification once access is granted, if required.

Accordingly, no land acquisition, physical displacement, compensation, or livelihood restoration measures are required under this Addendum. The findings are fully consistent with the principles and framework set out in the applicable RP.

12. ANNEX

The relevant Land Appraisal Documents and land registry records are provided separately at the link below:

https://drive.google.com/drive/folders/1jivSGK7CkSGhVgsROT30Zq-dY87mdglB?usp=drive_link