



CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN

Prepared According to the World Bank Environmental and Social
Standards

Project Owner	T. C. Ministry of Transport and Infrastructure General Directorate of Infrastructure Investments
Address	Hakkı Turaylıç Cad. No: 5 06338 Emek/Çankaya/ANKARA
Telephone and Fax Numbers	+90 (312) 203 10 00
Project Title	Cukurova Region and Iskenderun Bay Railway Connection Project
Project Location	Adana Province, Yumurtalık District, Osmaniye Province, Toprakkale District, Hatay Province Erzin District
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
Report Submission Date	5/14/2020

TABLE OF CONTENTS

TABLE OF CONTENTS	2
LIST OF APPENDICES	5
LIST OF TABLES.....	6
LIST OF FIGURES	8
ABBREVIATIONS	9
GLOSSARY	10
EXECUTIVE SUMMARY	13
1. INTRODUCTION	1
1.1. Project Description	1
1.2. Objectives of RAP	2
1.3. Scope of RAP.....	2
2. METHODOLOGY	4
2.1. Data Collection Tools.....	6
2.2. Limitations for RAP Study.....	7
3. LEGAL FRAMEWORK	8
3.1. Review of the National Legislation Governing Land Acquisition and Resettlement .8	
3.1.1. Expropriation Law	8
3.1.2. Resettlement Law	10
3.2. World Bank Environmental and Social Standards.....	13
3.3. Gap Analysis between National Legislation and International Standards	15
4. LAND ACQUISITION PROCESS AND REQUIREMENTS	23
4.1. Land Requirements of the Project	23
4.2. Land Acquisition Process of the Project	26
4.3. Transfer of Land Rights	31
4.4. Land Valuation Procedure	31
4.5. Resettlement Process	36
4.6. Cut-Off Date	36
4.7. Eligibility Criteria for Defining Various Categories of PAPs	37
4.8. Status of other components and project revisions	37
5. IDENTIFICATION OF PEOPLE AFFECTED BY LAND ACQUISITION.....	39
5.1. Landowners	39
5.2. Owners of immovable assets	41
5.2.1. Trees	41

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	 Altyapı Yatırımları Genel Müdürlüğü
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page iii / xiii	

5.2.2.	Structures.....	41
5.2.3.	Other assets	41
5.3.	Land users.....	41
5.3.1.	Formal (legal) land users	42
5.3.2.	Informal land users.....	42
5.3.3.	Agricultural Workers	43
5.3.4.	Beneficiaries of the common properties	43
5.4.	Owners of Businesses and employees	43
5.5.	Vulnerable Groups and PAPs that need special attention.....	43
6.	SOCIO-ECONOMIC AND DEMOGRAPHIC PROFILE OF PAPs.....	45
6.1.	Demographic Composition of PAHs	45
6.2.	Residency Status	49
6.3.	Ownership of Property and Vehicles	50
6.4.	Income and Expenses.....	51
6.4.1.	Income sources.....	51
6.4.2.	Expenses	53
6.5.	Land-Based Livelihoods	56
6.5.1.	Agricultural Land Use	56
6.5.2.	Ownership of Trees.....	58
6.5.3.	Agriculture and Garden Products.....	59
6.5.4.	Livestock Activities.....	60
6.5.5.	Usage of Common Properties	62
6.6.	PAPs' Perception of Livelihood and Suggestions for Improving Livelihoods	62
7.	POTENTIAL IMPACTS OF PHYSICAL AND ECONOMIC DISPLACEMENT	67
7.1.	Physical Displacement Issues.....	67
7.1.1.	Housing and Residential Structures	67
7.1.1.1.	Physical resettlement of a house	67
7.1.2.	Non-residential buildings	69
7.1.3.	Businesses	70
7.1.3.1.	Structures	70
7.1.3.2.	Physical Displacement of Super Energy Coal Processing Plant	71
7.1.3.3.	Physical Displacement of Parking Areas.....	74
7.2.	Economic Displacement Issues	75
7.2.1.	Loss of Land Assets	76

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page iv / xiii	

7.2.2.	Land Fragmentation	78
7.2.3.	Access to Land Problems	80
7.2.4.	Restriction in pasturelands.....	81
7.2.5.	Loss of trees and products	82
7.3.	Vulnerable Groups and PAPs that need special attention.....	83
7.3.1.	Vulnerable groups	83
7.3.2.	Agricultural Workers	83
7.3.3.	PAPs losing more than 20% of the total land assets	84
7.3.4.	Users of the lands belonging to legal entities	84
7.3.5.	Cumulative Impacts	84
8.	ELIGIBILITY FRAMEWORK AND ENTITLEMENT MATRIX	86
8.1.	Eligibility Framework.....	86
8.2.	Entitlement Matrix.....	87
8.3.	Additional Support Suggestions	102
8.3.1.	Protective and supportive measures for agricultural activities.....	102
8.3.2.	Minimizing the impacts on Yukariburnaz village	102
8.3.3.	Additional Measures for Vulnerable Groups.....	103
9.	RAP BUDGET.....	104
10.	MONITORING AND EVALUATION	106
11.	PUBLIC PARTICIPATION AND DISCLOSURE OF DOCUMENTS.....	111
11.1.	Consultation Activities Performed under RAP Preparation.....	111
11.2.	Further Consultation Activities under RAP Implementation	112
11.3.	Document Management and Disclosure to PAPs	113
11.4.	Feedbacks from Document Disclosure.....	113
12.	GRIEVANCE MECHANISM.....	117
12.1.	Purpose and Scope	117
12.2.	Roles and Responsibilities.....	117
12.3.	Principles of Grievance Mechanism.....	117
13.	IMPLEMENTATION OF RAP	120
13.1.	Roles and Responsibilities.....	121
13.2.	Implementation Schedule	123
	Appendices	125

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	 Altyapı Yatırımları Genel Müdürlüğü
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page v / xiii	

LIST OF APPENDICES

- Appendix 1. RAP Household Survey Questionnaire
- Appendix 2. RAP Workplace Replacement Questionnaire
- Appendix 3. Settlement (Mukhtar) interview form
- Appendix 4. Land Acquisition Impact Inventory of Individual Parcels Sarımsazı
- Appendix 5. Public and Legal Entity Parcels
- Appendix 6. Non-Cadastral Areas (NCA) used in the project
- Appendix 7a. Sample complaint register form
- Appendix 7b. Sample form of complain closure
- Appendix 8. Parcels summary list under impact
- Appendix 9. Replacement Costs of Super Enerji
- Appendix 10 Example of Land Entry Protocol
- Appendix 11. Example of Land Exit Protocol
- Appendix 12. Good practice example of GDoll

LIST OF TABLES

Table 2-1 Interview status with the right holders of the parcels belong to real persons	6
Table 3-1 Gap Analysis between Turkish legislation and World Bank Group Standards	16
Table 4-1 Number of parcels required for components of the Project	23
Table 4-2 Ownership Information of Project-Affected Lands	24
Table 4-3 Distribution of the required parcels by settlements	25
Table 4-4 Land Rights Required by Project Components	31
Table 4-5 Alternative route feedback / questions of stakeholders.....	38
Table 5-1 Number, shares and shareholdersof private lands with active title deed owned by real persons,.....	39
Table 5-2 Affected parcels that have uncertain ownership status (passive title deeds and non-cadastral lands).....	40
Table 5-3 Use of owned orchards.....	42
Table 6-1 Residency Status of PAHs in Affected Settlements	45
Table 6-2 Distribution of the PAHs according to the location of the lands affected by the land acquisition	45
Table 6-3 Usage types of parcels included in the survey study	45
Table 6-4 Demographic characteristics of the PAHs	46
Table 6-5 Size of PAHs' Residences	47
Table 6-6 Educational Status of Household Members.....	48
Table 6-7 Education Level of Students in PAHs	48
Table 6-8 Social Security Status of Household Members	49
Table 6-9 Ownership Status of Residences.....	49
Table 6-10 Potable Water Sources of PAHs' Houses	49
Table 6-11 Heating sources of PAHs' Houses	50
Table 6-12 Value of the House of Residence	50
Table 6-13 Ownership of Property other than the House of Residences.....	50
Table 6-14 Main Income Sources of PAHs	51
Table 6-15 Distribution of secondary sources of income.....	52
Table 6-16 Both main and secondary income sources.....	52
Table 6-17 Distribution of households by total annual income	53
Table 6-18 Expenses of PAHs by Spending Items	54
Table 6-19 Share of kitchen expenses in household expenses	54
Table 6-20 Share of heating, electricity and water costs in household expenses	55
Table 6-21 Share of education costs in household expenses	55

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page vii / xiii	

Table 6-22 Share of debt payments in household expenses	55
Table 6-23 Share of agricultural expenses in household expenses	56
Table 6-24 Types of owned lands.....	56
Table 6-25 Distribution of the households according to their use of the land they do not own or are not the shareholder for agricultural purposes.....	57
Table 6-26 Type of public land rented for agricultural purposes.....	57
Table 6-27 Type of private land rented for agricultural purposes.....	57
Table 6-28 Irrigation systems used	58
Table 6-29 Tree ownership status of the households.....	58
Table 6-30 Cultivated field and orchard products	59
Table 6-31 Distribution of the sample according to field and garden products	60
Table 6-32 Distribution of the sample according to animal ownership	60
Table 6-33 Distribution of owned animals according to their feeding places.....	62
Table 6-34 Perception of PAPs on Economic Competency	62
Table 6-35 Economic situation perception compared to last year	64
Table 6-36 Most Important Problems of the Region According to PAHs.....	64
Table 6-37 Suggestions of PAPs to Improve Livelihoods.....	66
Table 7-1 Demographic and socio-economic characteristics of household.....	68
Table 7-2 Fixed assets of Businesses to be displaced	70
Table 7-3 Personnel of Süper Enerji	71
Table 7-4 Distribution of all parcels affected by the project according to the usage rates in the Project	75
Table 7-5 Distribution of private parcels owned by real persons according to the usage rates in the Project	76
Table 7-6 How many pieces of individual parcels are divided and the possibility of unviable parts	79
Table 7-7 Cumulative impacts related to unviable land	79
Table 7-8 Situations that will prevent land access	80
Table 7-9 Distribution of the parcels under the influence according to their identified characteristics	82
Table 7-10 Being affected by another project	85
Table 7-11 Number of PAPs with multiple lands impacted	85
Table 8-1 Eligibility categories and principles.....	86
Table 8-2 Entitlement Matrix	89
Table 9-1 Estimated RAP Budget	104
Table 10-1 Roles of RAP Implementation units and staff in the M&E process	108

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page viii / xiii	

Table 11-1 Feedbacks of PAPs from Disclosure Activities.....	114
Table 13-1 RAP Implementation Activities.....	120
Table 13-2 Roles and Responsibilities in RAP Implementation	121
Table 13-3 RAP Implementation Schedule	123

LIST OF FIGURES

Figure 4-1 Project revision on Erzin Station	23
Figure 4-2 Number of difference and intersection sets of parcels belonging to real and legal persons	25
Figure 4-3 GDoll Land Expropriation Flow Chart	29
Figure 6-1 Usage types of the lands affected by the land acquisition (RAP field study, 2020)	46
Figure 6-2 Distribution of households members according to gender	47
Figure 6-3 Vehicle Ownership among PAPs (<i>Source: RAP field study, 2020</i>)	51
Figure 7-1 The house subject to physical resettlement.....	68
Figure 7-2 Structures in Toros Tarım I.C. Parking Area	71
Figure 7-3 Empty public land between free zone highway connection and Super Energy ..	74
Figure 7-4 Distribution of affected parcels by acquisition rates.....	75
Figure 7-5 Distribution of affected lands by acquisition rates	76
Figure 7-6 Erzin Yeşiltepe neighborhood citrus garden sales listings	78
Figure 7-7 Parcel No.1733 (ADANA-CEYHAN-SARIMAZI)	80
Figure 7-8 Parcel No. 6206 (HATAY-ERZİN-YEŞİLKENT).....	80
Figure 7-9 Agricultural lands and places of pastures used by Yukarıburnaz villagers.....	81
Figure 7-10 An example of a plot where high tree loss	82
Figure 7-11 An example of a parcel with low tree loss	82
Figure 7-2 Structures in Toros Tarım I.C. Parking Area	71
Figure 7-3 Empty public land between free zone highway connection and Super Energy ..	74

ABBREVIATIONS

ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
GDoll	General Directorate of Infrastructure Investments
GRM	Grievance Redress Mechanism
RAP	Resettlement Action Plan
M&E	Monitoring and Evaluation
MoEU	T.C. Ministry of Environment and Urbanization
MoTI	T.C. Ministry of Transportation and Infrastruce
NCA	Non-cadastral Area
OIZ	Organized Industrial Zone
PAH	Project Affected Household
PAP	Project Affected Person
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SSI	Social Security Institution
TUIK	Turkish Statistical Institute
WB	World Bank

GLOSSARY

Census: A complete and accurate count of the population that will be affected by land acquisition and related impacts. Census means a field survey carried out to identify and determine the number of Project Affected Persons (“PAP”), their assets, and potential impacts.

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

Cumulative impact: The impacts are more significant cumulatively than one by one, due to being within the scope of more than one project.

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

Displacement: The physical, economic, social and/or cultural uprooting of a person, household, social group or community as a result of the Project.

Displaced persons: are defined as persons who are affected in any of the ways described in WB ESS5. The word thus connotes all those people who lose land or the right to use land or who lose access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods. The term displaced persons are synonymous with “project-affected persons” and is not limited to those subjected to physical displacement.

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

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

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

Household: Refers to community consisting of one or more people who live in the same house or in a part of the same house, whether they have a kinship tie or who meet basic needs together.

Informal User: Refers to people who have no recognizable legal right or claim to the land they are occupying for residential, business and/or other purposes. They are not eligible for land compensation but qualify for compensation for loss of structures and improvements, loss of crops and transitional livelihood support.

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

Land acquisition: Includes both outright purchases of property and/or acquisition of access rights, such as easements or rights of way.

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

Livelihood restoration: In order to mitigate the economic displacement caused by involuntary resettlement, livelihood restoration process establishes the entitlements of affected persons and/or communities, and ensures that these are provided in a transparent, consistent, and equitable manner and that they are provided with adequate opportunity to re-establish their livelihoods.

Market value: The value that is required to enable affected persons and communities to replace lost assets with new assets of similar value.

Mitigation measure: Refers to the measures to be taken in order to minimize the negative impacts of impacts on livelihoods of the affected people.

Project: Refers to *Çukurova Railway Junction Line Connections Project*, including all its sub-projects, components and phases.

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

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

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

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

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

Resettlement: Covers all direct economic and social losses resulting from land taking and restriction of access, together with the consequent compensatory and remedial measures. Resettlement is not restricted to its usual meaning—physical relocation. Resettlement can,

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	 Altyapı Yatırımları Genel Müdürlüğü
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page xii / xiii	

depending on the case, include (a) acquisition of land and physical structures on the land, including businesses; (b) physical relocation; and (c) economic rehabilitation of displaced persons, to improve (or at least restore) incomes and living standards.

Resettlement Action Plan (RAP): The document in which a project sponsor or other responsible entity specifies the procedures that it will follow and the actions that it will take to mitigate adverse impacts, compensate losses, and provide development benefits to persons and communities affected by an investment project.

Resettlement assistance: Support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost workdays.

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

Unviable land: When a parcel subject to land acquisition is divided into more than one part, the remaining one or more parts become economically unusable. The reasons for this are; the remaining part may be too small, difficult to access the part, or the remaining part becomes useless with cumulative impacts. In some projects, parcels with the size of less than 1 acre are considered as unviable. A specific size is not specified for the unusable part in this RAP, it is recommended to make a consultative decision.

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

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page xiii / xiii	

EXECUTIVE SUMMARY

This Land Acquisition and Resettlement Action Plan (RAP) for Cukurova railway connectivity of the Project which aims to improve rail freight in Turkey with last mile connectivity and increase the operational efficiency of the logistics centers, RAP has been prepared to develop and implement a fair, transparent and consulted resettlement process which includes all stakeholders and affected parties. The land acquisition to be realized within the scope of the Project is within the provincial borders of Adana, Hatay and Osmaniye. In these areas the immovable affected assets are; croplands, orchards, vacant lands, public assets, pasture and settlement. In this context, the gaps between the laws of the Republic of Turkey and the World Bank requirements have been defined and measures to bridge these gaps have been discussed under this RAP.

Although the resettlement of dwellings was avoided to the extent possible in the Project, there are some cases that require physical displacement. A residential house, a barn and a few abandoned structures on public lands are affected by the Project. Apart from this, some abandoned and unused structures, ancillary structures (pole, canal etc.) and areas of use belonging to the workplaces are also affected by the Project. In the project design, the impacts on agricultural lands were also tried to be reduced and the railway route was placed in the spaces between the parcels. Therefore, only a few number of affected parcels are required to acquire. The use of private parcels has been minimised, while the use of public lands is higher. Less than 10% of private land parcel along the railway route will be impacted.

The groups affected by the land acquisition of the project are landowners, owners of assets on land, legal and illegal users of land and assets, agricultural workers, beneficiaries of public common property, affected business owners and their employees.

73 private lands, 58 public lands and 4 private lands with public shareholders are affected by the land acquisition requirements of the Project. Number of private parcels belonging to individuals is 59 while other private lands which were purchased for investment purposes are owned by companies. However, these company lands are used for agricultural purposes by farmers, just like public lands.

In the survey study conducted with the beneficiaries (owner, user or beneficiary) of the parcels needed for the construction of the project, it is observed that fruit production is under the influence. Erzin-Dörtyol Plain in the impact area of the project has been taken under protection according to the decision of the Council of Ministers on the Great Plain Status. For the lands to be acquired from this region, the opinion of the Hatay Provincial Directorate of Agriculture and Forestry should be taken, and productive structure of the region should be taken into consideration while compensation for the orchards is calculated. There is currently no public interest decision for the Project.

The affected citrus fruits and olive trees are located not only in the private-registered lands, but also in lands belonging to legal entities and non-cadastral areas. Within the scope of RAP, these areas have been identified and about 25 users have been identified as entitled. All affected groups are included in the Entitlement Matrix. In addition to the compensation measures provided in the matrix, additional mitigation measures have been developed. The implementation of all of these is considered to minimize the impacts of physical and economic displacement caused by land acquisition requirements of the Project.

	ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 1 / 123	

1. INTRODUCTION

1.1. Project Description

Building on the findings and results of the Bank-funded Technical Assistance on Last Mile Connectivity/Options to Improve Freight Rail Logistics in Turkey (P165757), Improving Rail Connectivity in Turkey aims to increase the freight modal share of railways in Turkey through last-mile connectivity improvements and strengthening of institutional capacity.

The project is developed around three main categories:

- Component I - Works is expected to include two main branching lines, Çukurova Region & Iskenderun Bay railway connection & Filyos Port/Industrial Zone connections, as well as two or three more projects to be selected from the list of 10 potential LMCs.
- Component II - Design & Consultancy is expected to include the survey, design & feasibility studies for the 10 potential LMCs identified by the Ministry as well as supervision of the construction works under Component I.
- Component III - Institutional Capacity Development is expected to include operating costs of the Project Implementation Unit as well as development costs of sectoral reforms and institutional capacity.

Within the scope of the 1st Component of the Project for Improving Railway Connections, it is planned to construct a railway connection line to the industrial facilities in Cukurova Region and İskenderun Bay - Yumurtalık Free Zone industrial centers and ports. The main purpose of the Çukurova Region and İskenderun Bay Railway Connection Project (the Project) is to make the transportation of raw materials and products economical by making infrastructure connection (such as OIZ - Port connection, OIZ - Main line connection) between the industrial areas. The railway connection line will connect the existing Osmaniye OIZ, Ceyhan OIZ and Ceyhan Energy Specific OIZ planned in the Yumurtalık Free Zone to the existing Toprakkale - Iskenderun railway line at the existing Erzin Station, which is planned to be extended.

GDoll is considering using international financing for the construction of Project. An Environmental and Social Impact Assessment (ESIA) study was carried out by ESIA Consultant in December 2019 to meet the environmental and social requirements of lenders. This RAP is also a part of this ESIA package. The main purpose of the Project is to improve the infrastructure connection between the industrial zones (OIZ-Port connection, OIZ-main line connection) and make the transportation of raw materials and products economical.

The Project is located in south of Turkey in Adana, Osmaniye and Hatay Provinces and it consists of two main lines with a total length of approximately 36 km crossing and includes five station buildings. Erzin station already exists and will be expanded and the rest of the stations will be built from scratch. The Project will serve Ceyhan OIZ, Ceyhan Energy Specialized OIZ and Erzin Port that are planned, as well as the existing Osmaniye OIZ and TAYSEB Yumurtalık Free Zone.

The main two lines and their sub-components of the Project are:

- (1) Osmaniye OIZ - Erzin Port Railway (Total length: 19,797 m)
 - a. Construction of 14,341 m railway between Osmaniye OIZ - Erzin Port
 - b. Construction of Osmaniye OIZ station
 - c. Construction of Erzin Port station
 - d. Construction of 2,252 m connection lines that will connect line coming from Osmaniye OIZ to Yukarıburnaz station

- e. Construction of 3,204 m connection lines that will connect line coming from Erzin Port to Yukarıburnaz station

(2) Construction of 16,300 m double-track railway that will connect TCDD Erzin Station-TAYSEB Free Zone Station Railway TCDD Erzin Station Railway to TAYSEB

- a. Construction of Yukarıburgaz Logistic station
- b. Construction of TAYSEB Yumurtalık Free Zone station
- c. Expanding of existing TCDD Erzin station

1.2. Objectives of RAP

The General Directorate of Infrastructure Investments (GDII) is committed to supporting sustainable development and social prosperity in its works. Therefore, GDII will carry out its activities in a way to protect the environment and communities. The project will evaluate the social, health, safety and environmental impacts of its activities and include these assessments in its planning, design and operational decisions. This RAP describes the objectives, principles, procedures and measures that should be adopted before, during and after the displacement of the Project affected people and assets. GDII is committed to comply with WB ESS5 in the development and implementation of RAP.

The objectives of RAP are as follows:

- To identify the land-based impacts of the project.
- To develop and implement a fair, transparent and negotiated resettlement process in which all stakeholders and affected parties can participate;
- To define compensation and mitigation measures in line with national laws and WB policies that allow minimizing the impact of land acquisition;
- To establish appropriate management procedures and systems for RAP implementation;
- To establish compliance with WB requirements in the implementation of resettlement and compensation activities;
- To implement resettlement activities together with affected parties;
- To enable stakeholders to participate in the planning, implementation and monitoring processes of RAP through the explanation of this RAP to stakeholders and the continued consultation during the resettlement process;
- To develop and implement convenience grievance procedures and mechanisms;
- To monitor (and revising if necessary) resettlement and restoration activities during and after resettlement;
- To ensure that vulnerable people / groups receive additional assistance when required.

1.3. Scope of RAP

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

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 3 / 123	

The local socio-economic context of the RAP is based on the findings of the field survey conducted in January 2020. RAP has been prepared to define and discuss the resettlement impacts associated with the Project activities.

The Project acts in accordance with WB ESS5 in order to minimize the impacts on the affected people and explains how to implement measures to minimize the resettlement impacts of the Project and monitor mitigation measures through this RAP. GDoll PIU has made as much effort as possible to avoid environmentally sensitive, important agricultural and residential areas when determining railway routes.

The objectives set out in this plan will be applied to all Project activities developed in relation to the construction and operation of the Project components. This plan is a living document (to be updated as needed). Therefore, changes that may cause an update need in the Project's Environmental and Social Management System (ESMS) will also be applied to the RAP and approved by the World Bank.

2. METHODOLOGY

Qualitative and quantitative research methods were used together, and the primary and secondary data were evaluated together in the RAP study which is conducted to plan the physical and economic resettlement caused by the land acquisition requirements of the project. The scope of RAP field work consists of settlements and workplaces which are on the parcels affected by the land acquisition of the project. Land acquisition requirements are expected to result in the following land-based impacts:

- Loss of residential houses and business buildings
- Loss of other immovable and fixed assets on land
- Loss of agricultural lands, agricultural crops and trees
- Loss of income sources and land-based livelihoods
- Restriction of access to lands
- Loss of common areas such as pasture and forest land.

Within the framework of the ESS5 requirements, the studies carried out for the preparation of this RAP as constituted on the following (1) desktop studies, (2) field study. The quantitative and qualitative data sources considered for both studies include:

- Turkey Statistical Institute (TUIK) and the Address Based Population Registration System (ABPRS) indicators,
- Socio-economic reports of Ceyhan Chamber of Commerce and Directorate of Erzin District Agriculture and Forestry,
- Official information from Erzin District Directorate of Agriculture and Forestry
- Consultations with the officials of Erzin District Directorate of Agriculture and Forestry, Erzin Chamber of Industry and Commerce, Erzin Chamber of Agriculture, Erzin (Yeşilkent) Irrigation Cooperative,
- Officials of Super Energy Coal Depot and Processing Plant Inc, Toros Tarım Sanayi ve Ticaret Inc., Yumurtalık Free Zone Directorate and Osmaniye OIZ Directorate,
- Interviews with Mukhtars of Sarımazı, Turunçlu, Aşağıburnaz, Yukarıburnaz,
- Household surveys (HHS) performed with owners and users of parcels that are subject to land acquisition.

Field study within the scope of RAP was carried out between 10-13 February 2020. Some of the institutional interviews were performed during the Social Impact Assessment (SIA) field study conducted between 14-17 January 2020. Before the RAP field study, the surveyors were trained on data collection tools and the Project.

Full census technique was applied for all parcels affected by the project components in the field study. Thus, it was aimed to contact the owners/shareholders, formal or informal users of affected lands and assets. For the parcels affected by the project, at least one or more owners, as well as the users, have been contacted, and the contact information of the owners and users who were not present during the site visit were obtained, and a questionnaire was applied to them through phone calls.

After the field study, GDoll submitted a project revision in the area to be used for Erzin Port station on February 19, 2020. The number of parcels affected due to this revision has increased. The owners of the recently included parcels were contacted by phone and a second round of surveys were carried out in March 2020.

Information about the owners and users of the affected parcels was obtained during the meetings with the mukhtars in four settlements (Sarımazı, Turunçlu, Yukarıburnaz,

Aşağıburnaz) affected by the land acquisition requirements of the project. Since the owners and users of the parcels whose addresses are registered in Yeşilkent reside in the Erzin district center, information about them was obtained from Erzin Chamber of Agriculture, Mukhtars of Mahmutlu and İsale neighborhoods of Erzin district center.

The data collected for the preparation of RAP were evaluated according to some impact conditions. These are;

- Ownership types of the lands that subject to land acquisition,
- User type of the lands subject to land acquisition,
- The amount of area to be used for the Project and the ratio of these amounts to the total parcel sizes of the land,
- Whether there is a part of the land to be unviable (divided, difficult to access, small-sized, nonproductive, etc.).
- Fixed assets on land (standing crops, trees, structures, wells, irrigation systems etc.)

The level of each of the circumstances described above allows assessing the magnitude of land-based impacts of the project. The study aimed to focus not only on private lands and their legal owners / users, but also public lands, formal/informal users and vulnerable groups.

The owners and users of the parcels registered within the borders of Turunçlu reside in Turunçlu, Aşağıburnaz and Yukarıburnaz villages. These villages were visited and the owners and the users (if any) were interviewed.

Among the shareholders of the affected parcels within the boundaries of Sarımazı, those having the address of Sarımazı were selected and Mukhtars asked whether those people were users or not and then it was firstly tried to contact with them.

If there is no user among the shareholders, in addition to interviewing one owner living in the village, the person who performs agricultural activity in the parcel as the only user was interviewed.

Owners and users of parcels registered in Yeşilkent currently reside in the center of Erzin district. For this reason, since it would not be an appropriate way to visit the addresses directly, records of the Chamber of Agriculture were used. The users could be reached since they perform agricultural activities on the parcels and are mostly registered in the Chamber. The questionnaire survey was conducted with the owners and users whose contact information could be taken.

To reach the owners of the parcels added with the revision in Erzin port location, contact information was obtained from the mukhtars (some were already the owners of the impacted parcels before the revision) and telephone interviews were performed.

As a result, the number of household questionnaires (HHQ) conducted is 45, and information about 64 parcels in total was obtained during these interviews. 10 out of 64 parcels that have been surveyed with their users belong to legal entities (8 Treasury, 1 public institution [BOTAŞ], 1 private company). HHQs were applied to the owners and/or users of 54 of the real persons' parcels. Since the owners are entitled to more than one parcel, the number of surveys is below the number of affected parcels. Besides, some parcels' deeds were passive due to the lawsuit and there was no information about the owners/shareholders. During the field study, it was aimed to reach the right holders of all affected parcels, which seemed to belong to individuals, but some could not be contacted.

Table 2-1 Interview status with the right holders of the parcels belong to real persons

	N	%		N	%
Real person parcels for which at least one right holder was interviewed with	54	83%	Interviewed with 1 entitled person	30	46
			Interviewed with 2 entitled persons	8	12
			Interviewed with 3 entitled persons	10	15
			Interviewed with 4 entitled persons	3	5
			Interviewed with 5 entitled persons	3	5
Real person parcels for which any right holder could not been interviewed	11	17%	Due to lack of address information in the land registry, could not be reached.	5	9
			Could not be reached	4	7
			Refused to answer questions	1	1
Total	65	100	Total	65	100

Source: RAP field study, 2020

The inventory given in Appendix-4 covers the analysis performed on all parcels (including those added by revision) that are affected by the project.

2.1. Data Collection Tools

Data collection tools used in the RAP field study are; (i) socio-economic household surveys with owners / users of immovable assets or lands affected by the project, (ii) settlement-level surveys with the Mukhtars and (iii) in-depth interviews with the owners/personnel of the affected business/workplaces. RAP field study was conducted in February, 2020

The household questionnaire surveys aimed to gather information about the general socio-economic status of the households in the study area, the importance of the affected lands in terms of sources of income, and the general views and expectations of PAPs on the project. Household survey generally includes; questions about home and infrastructure, agriculture and animal husbandry activities, income sources and expenditure items, self-perception, development of income sources of the settlement, information about the project and approach to the project, local employment opportunities within the scope of the project, use of common lands (See Appendix-1).

During the ESIA field studies, interviews were conducted with stakeholders who may be directly or indirectly affected by or interested in the Project and information was collected for RAP preparation. These stakeholders were; (1) local institutions and organizations (Public institutions and non-governmental organizations), (2) Organized Industrial Zone (OIZ) administrations that will be affected by the project, (3) officials of workplaces that will be affected by Project. The data obtained in these interviews were used in the preparation of both ESIA and RAP reports. In-depth interviews were performed with the businesses that were subject to physical and economic displacement by land acquisition of the Project about the possible impacts that may occur on their businesses and their future plans about relocation. The semi-structured question directive used during these interviews is presented in Appendix-2.

The socio-economic household questionnaire surveys and settlement-level surveys were carried out and included questions related to the resettlement impacts of the Project. Information on the following topics required for RAP was obtained by these surveys:

- Total land sizes and usage status,
- Local economy and livelihoods,
- Access and use of natural resources,
- Evaluations about vulnerable groups,
- Communication ways to the owners and users of the lands affected by Project (See Appendix-3 for settlement-level survey).

2.2. Limitations for RAP Study

The limitations and uncertainties encountered during the preparation of this RAP are indicated below:

- Difficulties in contacting PAPs who do not reside in impacted settlements,
- Insufficient/non-existent data for the determination of land users ,
- Some landowners rejecting to answer questionnaires.
- Complexity in the property pattern

The main limitation of the study was that there are parcels that were added to and removed from the list after the asset inventory had been prepared because of the late revision of project components. Land parcels that were newly added had nonetheless been observed during RAP field study, and interviews with the owners / users of these parcels been conducted by phone calls, the result of which have been reflected in this RAP.

In addition to above mentioned limitations, the location and technical specifications of other project components such as energy transmission lines (ETL), quarry and material borrow pits are yet to be determined. Therefore, the impacts caused by ETLs, quarries, material borrow pits and construction camp sites are not included in RAP since their locations and technical details are not determined yet. As the construction is foreseen to start in summer 2021, additional RAP studies will start, if necessary with the finalization of the locations of these project components and the preparation of expropriation files by the end of 2020 and the RAP will be updated or addendum will be prepared, in line with the references given in this report.

3. LEGAL FRAMEWORK

This section outlines the legislative framework that pertains to land expropriation and involuntary resettlement in Turkey as it applies to Project. It provides a summary of the relevant Turkish legislations and WB policies.

3.1. Review of the National Legislation Governing Land Acquisition and Resettlement

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

3.1.1. Expropriation Law

The specific article of Constitution states that except special cases the compensation value and the decreed increased value will be paid in full and cash to the users. The compensation of the farmers farming the acquired land is paid in full and cash, in any case. Private users cannot benefit from the expropriation of public lands and assets without paying compensation to the public at large. Even when land is acquired for public interest, expropriation agencies cannot benefit from the expropriation of private lands and assets without paying into a private bank account, in advance of actual land appropriation and project construction, the value of the expropriated assets.

Expropriation Law sets the procedures to be followed during; if and when it is required for public interest;

- the expropriation of immovable owned by real persons or legal identities subject to private law,
- the calculation of the expropriation fee,
- registration of the immovable asset and its appurtenances in the name of the expropriation administration,
- reclamation of the unused immovable assets, mutual rights and obligations as well as the procedures and methods for the settlement of the conflicts pertaining to them.

Article 3 - Requirements for Expropriation

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

Article 7 - Initial Procedures to be performed for Expropriation and Administrative Annotation

The administration that is to perform the expropriation prepares or commissions a scaled plan indicating the borders, surface area and type of the immovable assets of resources on which expropriation is to be constituted or appurtenances is to be constituted by way of expropriation, enables that the owners of the expropriated immovable asset, the ownerships if no title deed registrations are present and their addresses by binding them to documents

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 9 / 123	

through an inquiry it would conduct on the land registry, tax and population registry records as well as additional inquiries. After the administration takes the decision on expropriation, the related annotation of the expropriation in the title deed is notified to the title deed administration where the mentioned immovable asset is registered. If the owner changes after the notification date, the title deed administration is obliged to notify the administration of any changes to occur in the ownership or in the rights in kind that are separate from the ownership. If the document to be obtained from the court indicating that a request for the identification of the expropriation fee and the registration in the name of the administration as per the Article 10 is not submitted to the title deed administration within six months starting on the annotation date, this annotation is ex officio deleted from the title deed records.

Article 8 - Procurement Procedure

According to Article 8, after the expropriation decision is made, the administration will appoint one or more valuation commissions (consisting of at least 3 people) to identify the value of immovable. Additionally, one or more negotiation commissions (again consisting of at least 3 people) will be assigned for negotiations. After the administration has notified the owner of its intent to take over the immovable, shall the owner or its representative apply to the administration (within 15 days after notification) with the intent of selling the immovable, negotiation meetings are held on the date identified by the commission and if an agreement is reached on an amount that is not more than the estimated value, an official report is signed. The administration prepares the amount stated in the report within forty days and asks the owner to transfer the ownership rights in the name of the administration on the date specified in the title deed. The expropriation fee is paid as soon as the transfer of rights is realized. In cases where an agreement is not reached or transfer is not realized, action is taken as per the Article 10 of this Law.

Article 10 - Identification of the Expropriation Fee by Court and Registration of Immovable in the Name of the Administration

Article 10 states that, if the expropriation cannot be realized through procurement, the administration applies to the court of first instance in the locale of the immovable and requests that the expropriation fee for the immovable asset be identified and decision be made for its registration in the name of the administration in return for the payment of this fee. Within 30 days of the application of the administration, the Court notifies the owner of the immovable through an annotated invitation on the date of hearing. To those whose addresses could not be found after inquiries an announcement is made according to Notification Law (No. 7201) inviting them to attend the hearing. The Court also publishes information on the expropriation at least once in a local newspaper (if there is any) issued in the location of the immovable and in one of the newspapers circulated across Turkey. On the day of the hearing, the judge invites the parties to reach an agreement on the value of the immovable. If an agreement is reached, the judge considers this fee to be the expropriation fee. In cases where an agreement is not reached, the judge schedules an expedition (within ten days) to identify the value of the immovable asset and a date for the second hearing (within thirty days after the expedition). On the second hearing, if the parties fail to agree on the value once again, the judge will assign a new expert commission for the valuation within fifteen days and then identifies a fair and equitable expropriation fee by referencing both the reports and statements of the parties and experts. The identified fee is the expropriation fee of the immovable, resource or its easement rights. The Court grants fifteen days to the administration for the fee to be deposited in a bank on behalf of the owner. In cases where the right holder could not be identified, the court decides on the

registration of the immovable in the name of the administration under the circumstances that the bank receipt indicating the amount was blocked to be given to the right holder to be revealed in the future and that this decision is notified to the title deed department and the bank where the fee was deposited. The provision on registration is definitive and the parties reserve their rights for appeal pertaining to the fee.

Article 27 - Urgent Expropriation

The Expropriation Law (Article 27) states that, subject to a Council of Ministers Decree for national defense or in case of emergency, any immovable property may be expropriated by the administration undertaking expropriation for public interest. To apply the emergency clause of the law and to urgently acquire land through this mechanism, the value of the immovable property and asset (crop values are determined and paid prior to land entry) in question must be appraised by the valuation commission (established within the expropriation agency consist of relevant discipline experts) according to the article 11 of the Expropriation Law within seven days. The expropriation shall be made after the appraised value of the immovable is fully deposited by the administration in the name of the owner.

Article 27 of the law allows the expropriation body to enter the field earlier as compared to the timing of entry under the standard expropriation procedures, but the article does not limit the claims of the owner on valuation of land and fixed assets. The valuation process is done by the court or court nominated experts within one week. This article will only be used when other avenues have failed.

The Expropriation Department of GDoll will be the main land rights agency / authority in the preparation of the expropriation plans and the implementation of the expropriation process. The land acquisition strategy of GDoll is based primarily on the follow-up of the negotiated settlements and then on the legal court process if the negotiations fail. PIU does not expect to apply urgent expropriation procedures in the Project.

According to the Expropriation Law, in case of an ongoing lawsuit on parcels for the identification of right holders, the parcels are valued and the expropriation value is deposited in a escrow account and blocked. When the case is concluded with the decision of the court, this payment is transferred to the identified right holders. The system avoids any loss of income during the court process since legal interest is paid for the expropriation value in the escrow account.

3.1.2. Resettlement Law

Resettlement activities are regulated by Resettlement Law No. 5543 and Regulation for the Execution of Resettlement Law. Resettlement Law deals with the families applying to related governmental agencies in the project region and requesting government assisted resettlement. Resettlement assistance of the government is provided for entitled families while expropriation compensation payments are paid to all individuals possessing immovable properties in the project area. According to the Article 3 of the Law, three types of resettlement can be applied as for that the choices and requests of affected families. Article 3 of the Law reads this point as follows;

“ARTICLE 3 - (1)

a) Agricultural resettlement: Agricultural resettlement is implemented through providing a family with the following; agricultural land at the amount of envisaged in special resettlement project prepared by Ministry of Environment and Urbanization (MoEU), house,

management building, animal, agricultural devices and tools, workbench and credits one or more.

b) Non - agricultural resettlement: This type of resettlement is implemented through providing a family with the following: building plot at the amount provisioned in special resettlement project, house, devices, tools, workbench and loans one or more.

c) Physical settlement: This type of resettlement is implemented through providing construction credit support to a family within the amount of loan determined by the Ministry (MOEU) for the aim of re-building (moving) of villages because of unsuitability of a village centers or consolidating of villages because of dispersed settlement or villages which are fragmented as a result of disasters; after selling land (house plot) from village development areas to people in need”.

Article 12 of the Law refers to the resettlement of persons whose immovable assets are expropriated, and specifies eligibility criteria for government assisted resettlement as follows:

“(1) Due to the construction of a dam, an area adjacent to the dam, an area under protection, airport, highway, railway, plant and other facilities related to national economy and defense will be erected by public institutions and organizations; and due to the implementation of special laws and in order to protect historical and natural valuables;

a) The families who have to leave their locations/places as a result of partial or full expropriation of their immovable properties,

b) The families who do not own any immovable property, but who reside in the expropriation area at least for three years before the beginning of the calendar year, in which the resettlement planning studies were commenced, will be resettled to the locations/places indicated by the Ministry (MoEU) according to the provisions of this Law, provided that they request.

(2) However, the families who own immovable properties to be expropriated but left their places before the commencement date of resettlement planning studies shall not be resettled. Within the last three years as of this date, the families who sold their immovable properties without any compulsory situation and did not purchase immovable property with the equal or higher value shall not be resettled even if they did not leave their places. The compulsory situations mentioned above shall be determined by the regulations.

(3) Among the families residing in the expropriation area, those who are affected from the expropriation implemented by the public institutions and organizations, can be resettled by the Ministry to a location indicated within their village boundaries upon their written application if they do not want to be resettled by the government in any other place, provided that the suggestion of relevant Governorate and the approval of the Ministry of Interior are obtained.

(4) Among the families included in the scope of this article, and requested to be resettled by the Government;

the families who do not apply within the ninety-day following the ending date of the announcement of resettlement, and

the families who do not commit to deposit the amount determined by the Ministry (MoEU) from their expropriation compensation they received or will receive, or their full expropriation compensation and additional increase awarded by court in the case that the

amount of expropriation compensation is lower than the amount (determined by the Ministry) into the account of the Central Account Unit of the Ministry, shall not be resettled.

This article states that the affected family (entitled to expropriation compensation) requesting government assisted resettlement has to commit to deposit a certain amount of this compensation to the Ministry of Environment and Urbanization. The Regulations/Instructions for implementation of Resettlement Law defines this amount as 120 times of the gross monthly (30 days) minimum wage of any worker who is older than 16 years. If the affected household requesting government assisted resettlement is not entitled to expropriation compensation, then they are not required to pay down payment (as deposit) to the Ministry. Upon the completion of resettlement construction process the cost of resettlement shall be paid by the household to the Ministry within 15 years after a 5-year grace period and without interest. Naturally, the amount of down payment shall be taken into account (deducted). The amount of down payment is updated as of this netting date. Furthermore, according to regulations of the Law, if there are workers or persons with pension from any social security organization in the family, total annual amount of their wage/pension should be less than 18 times of monthly minimum gross wage.

Resettlement Assistance; Article 9 of Resettlement Law explains the resettlement assistance (which is similar to WB Standards) as follows:

- a) "At first, house and its' house - plot (for building),
- b) For craftsmen, artisans and tradesmen: workplace and its' building plot and operation credit to enable them providing for their livelihood,
- c) For farmers, land, necessary agricultural inputs, agricultural structures or plot of structure, and in kind and in cash operation and equipment credits as envisaged in agricultural resettlement project (specific),
- d) In case of the request of the right holder families (entitled to resettlement), resettlement credits can be given to the families collectively or individually, if the house, workplace and agricultural land are found by themselves and their suggestions are approved by MoEU."

Other assistances can be summarized as follows;

"Transportation (moving) of those entitled families to the resettlement areas (sites) shall be provided free of charge by the government according to the "Transportation (moving) Project" to be prepared (specifically) by the Ministry,"

In sum, landless families, renters of houses and/or workplaces, tenant users of the land, formal/informal users of treasury or forest areas and artisans including itinerant peddlers without immovable property but living in that area can be entitled to government assisted resettlement for which they might be eligible.

The Resettlement Law and Regulation for the Execution of Resettlement Law provides for government-assisted resettlement in the rural and urban areas. Two households that will be subject to physical resettlement have been identified in the project area. In addition to compliance with national law, Project will also comply with the World Bank's ESS5 on Involuntary Resettlement in order to address any gaps that are found in Section 3.3 regarding resettlement entitlements.

Consultation Requirements for Land Acquisition of the Legal Instruments

The key legal instruments that regulate land expropriation and resettlement require different levels of consultation with the affected populations; the consultation requirements of these laws and their reference to stakeholder engagement do not correspond to

	CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION PROJECT RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 13 / 123	

international standards. The Expropriation Law focuses primarily on the provision of information to the affected owners of immovable assets. The Law also requires consultations and negotiations for the valuation of the expropriated assets; this requirement instructs the expropriation agency to work together with all relevant local institutions, including branches of the Ministry of Food, Agriculture and Livestock, other government departments and real estate firms, as well as with the affected populations.

The Resettlement Law incorporates a level of consultation with affected persons and communities that goes beyond mere information provision. These concern the choice of resettlement sites rather than on encompassing broader aspects of the resettlement process, such as house design, community layout, etc. Consultation with the affected people is essential in the framework of Government assisted resettlement since the compensation payments for residential structures, together with other immovable assets on them, are kept by the resettlement agency to finance the new resettlement arrangements. Because the resettlement homes are often more costly than the traditional homes the affected people reside prior to the project, the difference between the value of affected assets and the actual costs of new residential units are paid by the affected people over a period of time. Thus, the concept of replacement cost that is privileged by the WB and IFC is not used in Government assisted resettlement arrangements. As a result, owners of affected assets often reject Government assisted resettlement; only those families that use (but do not own) the Project affected homes consider participation in such arrangements. Regulation for the Execution of Resettlement Law states that the disclosure shall be held by written notification and be posted for 30 days at an apparent place (such as schools, mosques, cooperative buildings etc.)

The Cadastral Law (No. 3402) determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps in order to register land and to constitute the basis of the spatial information system as the Civil Law (No. 4721) stipulates. In accordance with the Cadastral Law, the regions to be surveyed shall be notified via the Official Gazette, radio, television and local newspapers and other traditional ways, 30 days prior to the beginning of cadastral works. At least 15 days prior to the cadastral surveys, the Cadastral Manager shall notify the village to be surveyed and the adjacent village and municipalities by traditional ways. The Cadastral Technicians shall inform the villagers by the traditional ways, about the place to be surveyed, seven days before they start the cadastral survey.

3.2. World Bank Environmental and Social Standards

Involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out. ESS5 acknowledges that project related land acquisition and restrictions on land use may have negative impacts on communities and individuals. Project related land acquisition or land use restrictions may cause physical displacement (displacement, residential land or shelter loss), economic displacement (leading to loss of access to land, assets or assets, loss of income or other livelihoods), or both. Resettlement is considered involuntary when affected people or communities do not have the right to reject land acquisition or land use restrictions resulting in displacement. This standard emphasizes that mandatory resettlement should be avoided. If not avoided, necessary measures should be taken to reduce negative impacts on displaced people.

ESS5 requires that the land will not be obtained or assets will be lost before providing the affected people with full compensation and resettlement sites and relocation funds where applicable.

In addition, ESS5 requires the Project to develop and implement a resettlement plan that covers all affected persons. In this context, ESS5 requires that the Project transfer information and consultancy to the displaced persons during the preparation of the Project resettlement plan.

For these reasons, the overall objectives of the World Bank's ESS5 on Involuntary Resettlement are the following:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

To address the impacts covered under involuntary resettlements of this policy, the borrower (GDoll) prepared a RAP that covers the following:

- The resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are
 - informed about their options and rights pertaining to resettlement;
 - consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
 - provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.
- If the impacts include physical relocation, the resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are
 - provided assistance (such as moving allowances) during relocation; and
 - provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, locational advantages, and other factors is at least equivalent to the advantages of the old site, compensation for their losses at full replacement cost and assistance in improving their former living standards, income earning capacity and production levels or at least restoring them.

“Replacement cost” is the method of valuing assets endorsed by ESS5, and entails the following:

- Paying special attention to the adequacy of the legal arrangements concerning land title, registration, and site occupation;
- Publicizing among people to be displaced the laws and regulations on valuation and compensation;
- Establishing criteria for determining the resettlement eligibility of affected households; and
- The grievance procedures available for dispute over land acquisition.

ESS5 also recognizes that some types of loss, such as access to public services, customers and suppliers, grazing or forest areas, cannot easily be compensated for in monetary terms and, therefore, requires the Project to attempt to identify alternative ways to fully restore pre-project levels of livelihoods.

While ESS5 covers all affected people, it calls on the Project to pay particular attention to the needs of the poorest groups to be resettled and specifically states that the absence of legal title to land should not bar compensation to the population adversely affected by the Project, indigenous groups, ethnic minorities and pastoralists who may have usufruct or customary rights to the land or resources taken for the Project.

Explaining the standards on consultation requirements with project-affected individuals and groups, the ESS10 requires borrowers to engage with stakeholders throughout the project life cycle and initiates such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders in project design. The nature, scope and frequency of stakeholder engagement will be commensurate with the nature and scale of the project and its potential risks and impacts. According to ESS10, Borrowers will conduct meaningful consultations with all stakeholders, provide them with timely, relevant, understandable and accessible information, and consult in a culturally appropriate manner without manipulation, intervention, oppression, discrimination and intimidation.

As detailed in the ESS10, the Borrower needs to respond to the project affected parties' concerns and complaints about the project's environmental and social performance in a timely manner. To this end, the Borrower will propose and implement a grievance mechanism for resolving such concerns and complaints.

3.3. Gap Analysis between National Legislation and International Standards

There are several gaps between international standards and national legislation in regard to the preparation of RAP. First, under Turkish law, RAP is not a requirement for investments that cause economic and physical displacement. Similarly, an Environmental and Social Impact Assessment is a requirement under international standards, but only an Environmental Impact Assessment is required under Turkish law (only for the projects listed in Appendix-1 and Appendix-2 of the EIA Regulation). In addition, within the national legal framework, there is a lack of specific requirements for consultation and disclosure of RAP and Social Impact Assessment (SIA). The activities relevant to RAP consultations and disclosure are less explicit in Turkish national legislation, thus requiring the application of WB policies.

The main gaps between Turkish Law and World Bank Environmental and Social Standards are summarized in the table below (Table 3-1).

Table 3-1 Gap Analysis between Turkish legislation and World Bank Group Standards

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
Identification of Potentially Adverse Impacts of Land Acquisition	Adverse direct and indirect livelihood impacts of the land acquisition and other immovable assets identified and minimized. Lost livelihoods and decreased living standards are restored and improved.	There is no provisioning in the Turkish Law for livelihood restoration.	GDoll commits to apply international requirements through a Resettlement Action Plan. In cases where land-based livelihood impacts are found to be major a Livelihood Restoration Plan will be developed and implemented.
	Affected populations and impacts should be: - identified through thematic maps, a census, - an inventory of affected assets, - socio-economic surveys and studies, - analysis of surveys and studies, - consultation with affected populations.	Inventory of assets are required by Turkish Law. Land acquisition through expropriation requires the preparation of a census of affected immovable assets, and a list of their owners. No studies, surveys and consultations are required. Consultations for negotiated purchase of immovable assets are required by Article 8 of Expropriation Law.	An assets inventory is prepared. Full census method is used during household surveys with landowners/user affected by Project components. Surveys, GIS and Corine database are analyzed. Consultations in line with the SEP document are carried out in different stages with a range of stakeholders.
Physical Displacement	Involuntary resettlement should be avoided or minimized where feasible.	There is no provision regarding the minimization of resettlement in Turkish Laws.	All project specific alternatives are evaluated and the alternative that would result in a minimal level of physical resettlement is selected.
	All PAPs losing homes are entitled to resettlement	Resettlement entitlements are limited to certain categories of PAPs. Each nuclear family within affected dwellings is entitled to a resettlement	Impacts on dwellings will be eliminated through design. If dwellings are affected, will be handled individually for each case in accordance with this RAP and WB ESS5.

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
		home; this provisioning exceeds international standards. Article 12 of Resettlement Law states that the families who do not own any immovable property, but who reside in the expropriation area at least for three years before the beginning of the calendar year, in which the resettlement planning studies were commenced, will be resettled to the locations/places indicated by the Ministry (MoEU) according to the provisions of this Law, provided that they request. According to The Turkish Civil Law No. 4721, Article 713; "A person who holds an immovable property that is not registered in the title deed and who has possession of the immovable property for two decades without any trial and ownership as an owner may request that the right of ownership on the whole, one part or one part of the immovable property be registered in the title deed". In accordance with this provision, possession by usucaption is only for immovable property which is not registered in the title deed.	GDoll will allocate its available sources and budget to compensate physical and economic displacement of all PAPs including informal users who are not entitled to resettlement in Turkish legislation. All PAPs will be entitled to different types of compensation in accordance with this RAP and WB ESS5. Should government led resettlement be opted for, GDoll will be in close coordination and cooperation with MoEU to follow the resettlement process (according to Law #5543) to ensure that PAPs are provided with accommodation options and livelihood support before the civil works of the Project commence.
	Resettlement plans should be developed in cases where displacement is unavoidable.	No legal provisioning forces the project proponents to prepare social impact	GDoll performed RAP and SIA studies in accordance with WB ESS5.

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPS
		assessment and/or resettlement action plan under Turkish Law. Resettlement Law 5543 provides resettlement options to displaced PAPs by asking their preferences for urban versus rural resettlement.	
	Homes and residential land will be compensated by use of replacement value. Amortization is not allowed. Rural, urban and residential land is compensated by use of market prices.	Lost homes are not compensated by use of replacement value. Homes are compensated by use of their cost of construction with high quality material in the market. Amortization is taken into account. Residential land is compensated by its market prices, by using net capitalization method.	Cash compensation will be provided at unit price which covers all transaction costs as defined by WB ESS5 plus the cost of any registration and the transfer taxes. Depreciation of the asset will not be taken into account. In brief, the compensation for lands and structures will be at replacement cost as defined in the ESS5.
Economic Displacement	The loss of assets or access to assets that results in loss of income or other means of livelihood should be restored.	Economic displacement is implicit in the Expropriation Law that allows compensation for lost assets based on discounted net income. Valuation of agricultural land, trees, vineyards etc. is based on net income capitalization method and will consider additional factors that may have an impact on the immovable asset.	International requirements will be applied through Resettlement Action Plan(s) and where necessary via a Livelihood Restoration Plan.
	Economically displaced (loss of income as a result of land acquisition) PAPs and/or communities should be compensated and offered other assistance where required.	No legal provisioning is made in the Turkish legislation except for those that opt for State-Assisted Resettlement.	Entitlements for economically displaced PAPs are identified as transitional livelihood support, crop payment for unviable lands, cash compensation for

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
			loss of structures, water wells, livestock pens, transportation costs, title deed costs and payments regarding the loss of common lands such as grazing lands. Those entitlements will be paid from available sources and budget of GDoll since there is no legal provisioning made in Turkish legislation.
	Project related losses of the affected people should be compensated in full and in cash prior to the actual acquisition of immovable assets. All transaction costs should be paid. Not only title deed holders, but also customary owners, tenants, public land users and squatters are entitled to compensation.	Only the legal owners can receive monetary compensation (via the expropriation of lands). Users rights on public and private property are recognized due to recent changes in the Turkish Law. Traditional rights are recognized (with the exception of forest lands that do not recognize user rights).	All PAPs will be entitled to compensation. Users as well as owners will be compensated for assets and standing crops. Compensation measures that exceed provisions of national law will be covered by GDoll.
Common Property Resources	International policies require compensation for livelihood losses of individuals and communities that result from acquisition of pasturelands.	No legal provisioning is made in the Turkish legislation. The pasture and meadow losses of the families or the associated income losses of villages cannot be compensated.	Compensation payments regarding the economic livelihood losses arising from not being able to use common lands for grazing purposes will be defined in this RAP and provided by GDoll.
Transitional Livelihood Support	According to ESS5 the borrower will provide transitional support “to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.”	Transitional support is available only for government led resettlement.	Livelihood supports will be provided by GDoll to economically displaced people.

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
Monitoring and Evaluation	Procedures to monitor and evaluate the implementation of a Resettlement Action Plan will be established.	No legal provisioning is made.	GDoll will monitor the RAP implementation process regularly (internal monitoring). GDoll will receive support from independent consultants to perform external monitoring and completion audit as planned in this RAP.
Grievance Resolution	A grievance mechanism will be established to receive and facilitate resolution of concerns and grievances of affected people and communities about the Project. In order to resolve concerns promptly, an understandable and transparent consultative process that is culturally appropriate and readily accessible should be used. Affected Communities and people will be informed about the grievance mechanism in the course of the stakeholder engagement process.	The use of a grievance mechanism is not provisioned.	GDoll will establish a Grievance Mechanism to receive and facilitate resolution of concerns in accordance with WB policies.
Consultation / Participation	All people affected by land acquisition activities and other key stakeholders should be consulted and involved in resettlement planning.	There is no provision regarding to public participation in Turkish Laws. There is no requirement for Stakeholder Engagement Plan.	Current international standards of Stakeholder Engagement will be met by GDoll. GDoll has prepared a Stakeholder Engagement Plan for the implementation of all consultations throughout Project. GDoll will conduct

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
	The resettlement site must be chosen through consultation with all displaced people and host communities.	The Resettlement Law allows consultation in the process of selecting the resettlement sites to those who opt for State-Assisted Resettlement.	consultation meetings with all people affected by land acquisition activities. Considering the ongoing COVID-19 situation, DGoll will employ additional measures for the consultation of the RAP and for other engagement activities defined for the implementation of this RAP in line with project SEP. Physically displaced persons will be separately consulted in accordance with the internationally accepted principles,
Vulnerable Groups	Particular attention is to be paid to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly woman and children.	Expropriation and Settlement Laws do not make any definition for vulnerable groups. However, the State guarantees that citizens of live their lives in peace and security in accordance with Turkish Constitution, and also encourages them to achieve high socio-economic living standards. In this context, the State implements various rules and measures to protect and support needy, weak, helpless and homeless citizens (eg, Law No. 2022 on 01.07.1976).	Vulnerable groups affected by the Project are described in Section 7.3. Vulnerable people will be precisely found out to evaluate their losses in terms of livelihood restoration during the negotiation and land acquisition process. Livelihood impacts on these vulnerable groups will be assessed and compensation will be provided from available sources and budget of GDoll where necessary. Special effort will be made to encourage female owners and users to attend to negotiations and to register their entitlements.

Gap Subject	World Bank Group Standards	Turkish Legislation	Measures to bridge the GAPs
			Verbal communication channels will be available for those who are illiterate. Notary and transportation expenses of the elderly, disabled and sick right holders who are unable to withdraw their payments.
Gender	International policies address gender-differentiated aspects of impacts and opportunities, as well as gender-responsive consultation processes. The use of land and natural resources affected by the Project should be assessed in gender inclusive manner and specifically consider women's role in the management and use of these resources.	Customary law in the Project areas may deny women the right to ownership and management of cultivated lands. These customs are not recognized by the Civil Law, which states that all siblings and extended family members, regardless of gender and age, have similar inheritance rights.	GDoll will ensure that compensation arrangements should be issued in the names of both spouses or heads of households. Project's consultation process will capture both men's and women's views, if necessary, through separate forums or engagements.
Human Rights	Human rights issues are embedded in resettlement planning. The sponsor should ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities.	There are no provisions in the Turkish laws.	GDoll will recognize international Human Rights principles.

4. LAND ACQUISITION PROCESS AND REQUIREMENTS

4.1. Land Requirements of the Project

The route planned within the scope of the Project is planned to have a maximum width of 60 meters. The Project components require permanent expropriation (mostly partial) from which the ownership rights of the land are obtained.

Land acquisition requirements were tried to be minimized during the design and planning phase of the project. Although treasury lands were utilized as much as possible, private land acquisition was unavoidable. Especially the land acquisition was very limited in the railway line between Osmaniye OIZ - Erzin Port and at the stations on both ends. However, the necessity of moving of planned Erzin port towards the coast required that the Erzin port station planned to be built in the scope of Project to be built on the private agricultural lands. The fact that the station will be built in the area shown by the red line in Figure 4-1 slightly increased private land acquisition.

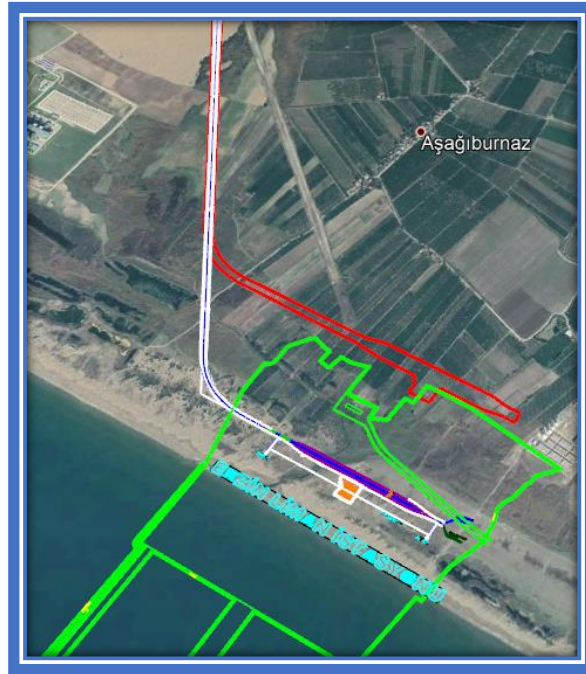


Figure 4-1 Project revision on Erzin Station

The affected lands will be permanently expropriated for the two main lines, connections, four new stations and one station expanding that will be constructed within the scope of the Project. The total area needed for the Project is 1,512,643.77 m² (1,512 decares).

The number of parcels required by each Project component is presented in Table 4-1 . The immovable/structures, cultivation/usage status, standing crops/trees and satellite images of the parcels to be acquired for the Project are indicated in detail in the Asset Inventory given in Appendix-4 and Appendix-5.

Table 4-1 Number of parcels required for components of the Project

Main Component	Sub-Component	The number of Parcels
Osmaniye OIZ - Erzin Port Line	14,341 m railway between Osmaniye OIZ - Erzin Port	20
	Osmaniye OIZ station	2

Main Component	Sub-Component	The number of Parcels
(Total length: 19,797 km)	Erzin Port station	20
	2,252 m connection lines that will connect line coming from Osmaniye OIZ station to Yukarıburnaz station	2
	3,204 m connection lines that will connect line coming from Erzin Port station to Yukarıburnaz station	9
TCDD Erzin Station-TAYSEB Free Zone Station Line	16,300 m double-track railway that will connect TCDD Erzin Station and TAYSEB station	64
	Yukarıburgaz Logistic station	2
	TAYSEB Yumurtalık Free Zone station	18
	Expansion of existing TCDD Erzin station	6

A complex property pattern has been observed in the Project area¹. It has been observed that some parcels have both public and private owners at the same time. It is seen that 44% of the lands are public land when it is classified in terms of ownership while the ratio of private parcels is 55% (Table 4-2). The usage of public and private land categories were considered to be insufficient to define the complex ownership structure in the project area, due to the fact that parcels owned by companies are mostly used by farmers to carry out agricultural activity (formal or informal), similar to the utilization public lands in the region. Therefore, private lands owned by real persons and legal entities were separated to discriminate different types of land acquisition induced impacts. The study has focused on the users of these legal entity-owned parcels as they are likely to encounter impacts on livelihoods.

Table 4-2 Ownership Information of Project-Affected Lands

Ownership	N	%	Ownership type	N
Private lands	73	55	Real person	50
			Ongoing court case process to settle ownership rights (Real person)	8
			Uncertain (thought to be Real person)	1
			Legal entity (private company)	11
			Shared ownership of real persons and legal entity (private company)	3
Private lands with public shareholders	2	1	Shared ownership of real persons and legal entity (public institution)	1
			Real and legal person (treasury) shareholder	1
Public lands	58	44	Common property	2
			OIZ	5
			Public institution ²	3
			Treasury	46

¹ On the parcel basis, different forms of ownership can be seen in Appendix 8.

² Two parcels belong to TCDD in Turunçlu and Yeşilkent, one parcel belongs to DSI in Yeşilkent and one parcel belongs to BOTAŞ in Yeşilkent.

Ownership	N	%	Ownership type	N
			Undetermined (thought to be common property)	2
Total	133		Total	133

The distribution of parcels owned by real persons, Treasury, public institutions, companies (legal entities) and communal areas are given in Figure 4-2. The distribution indicates that the number of parcels owned by real persons/individuals are 64 in which the number of parcels within this figure owned both by real persons and legal entities are 5.³

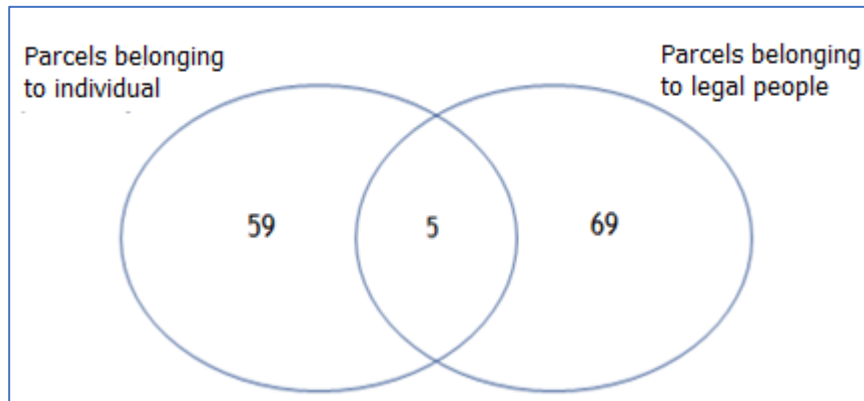


Figure 4-2 Number of difference and intersection sets of parcels belonging to real and legal persons

Considering the distribution of the parcels required for the Project by settlements where they are registered, it is seen that 44 parcels are registered in Adana province Ceyhan district Sarımaşı village, a total of 85 parcels are registered in Hatay province Erzin district; 57 in Turunçlu village and 28 in Yeşilkent village, and 4 commercially owned parcels are registered in the Tüysüz village of Toprakkale district, Osmaniye province (See Table 4-3).

Table 4-3 Distribution of the required parcels by settlements

	Adana Ceyhan Sarımaşı	Hatay Erzin Turunçlu	Hatay Erzin Yeşilkent	Osmaniye Toprakkale Tüysüz	Total
Parcels belonging to legal entities	41	19	5	4	69
Parcels belonging to real persons	3	35	21	0	59
Parcels in which individual and legal people are shareholder	0	3	2	0	5
Total	44	57	28	4	133

The parcels for which detailed information can be accessed from the land registry system are called "active title deed", while the others for which the information can not be found are called "passive title deed". The 64 parcels that belong to the real persons consist of two groups;(1) private lands with active title deed and (2) private lands with passive title deed. Rights owners of private parcels with passive title deed whose records could not be accessed

³ In this RAP report, the common private parcels were classified as real person parcels, considering their importance within the sources of income. For this reason, while the assessment of the study considers the total sum of the real person parcels to be 64 (59 + 5), the legal entity parcels were assessed based on 69 parcels.

because of land registry problems and court cases (inheritance transfer) were identified during RAP field study.

4.2. Land Acquisition Process of the Project

Although the project has avoided the factors that may cause resettlement during the planning phase, it requires the expropriation of public and private lands. Therefore, physical and economic resettlement can lead to impacts such as blocking or restricting access to economic assets and resources. GDoll Expropriation Department follows the following steps in the land expropriation process;

- 1) Determining which layouts the expropriation limit coincides with
 - 2) Letter of data request from the Cadastre Directorate to which the expropriation area belongs
 - 3) Obtaining the required maps from the Cadastre Directorate and reaching agreement on the finalized cadastral data
 - 4) Identification of immovable properties corresponding to expropriation from cadastral data
 - 5) Provision of title deed records from the Land Registry Directorate where the immovable are affiliated
 - 6) Identification of owners/shareholders
 - 7) Provision of population and succession information of the owners from the relevant Registry Office
 - 8) Identification of full right holders (including formal and informal users)
 - 9) Address investigation of right holders (relevant Registry Office, Land Registry, Police, Gendarmerie, Municipality, Mukhtar)
 - 10) Establishment of the Appraisal Commission
 - 11) Establishment of Reconciliation Commission
 - If the type of real estate is "Land";*
 - a. Provision of tax declaration from the relevant Municipality
 - b. Requesting precedent sales from real estate offices and land registry offices
 - If the type of real estate is "Arable Land";*
 - a. Requesting agricultural economic data from the relevant Agricultural Directorate
 - 12) Creating data that will form the basis of valuation
 - 13) All verbal data provided are stored in tables, photographs are stored electronically and geographical data are stored in CAD format in digital format.
- Beginning of separation (submission) notification process;
- i. Preparation of declarations
 - ii. Technical control and approval from the relevant Cadastre Directorate
 - iii. The completion of the submission procedures of the approved declarations from the related land registry office.

Urgent expropriation and cost determination litigation process;

- iv. Taking a presidential decision
- v. Ministry approval
- vi. Determination of the areas to be expropriated on the basis of parcel by preparing expropriation plans
- vii. Opening cases in the Civil Court of First Instance where the expropriation project is located

viii. Payment of the fees determined by the court

If an agreement was reached as a result of expropriation negotiations;

- Transferring the shares of title deed owners who have been agreed

If no agreement was reached as a result of expropriation negotiations;

- To open registration lawsuits against right holders who have not signed or participated in negotiations.
- Implementation of court decisions as a result of registration and cost determination cases

14) Preparing expropriation plans and determining expropriation areas on parcel basis

15) Establishment of an expropriation valuation commission

16) Determination of the market prices of the immovable to be expropriated

17) Receiving market prices from the General Directorate of National Real Estate

18) Preparation of the valuation report

19) Beginning of Land Identification Process

If a local expert will be requested;

- a. Requesting the local expert from the Local Authority

If a local expert will not be requested;

- a. Establishment of the detection commission

20) Determination of the quality and quantity of the land and the elements on it such as structure, tree, product etc. with the expert or detection commission

21) Establishment and approval of the determination minutes

22) Notification of the right holders to be negotiated about the immovable properties within the scope of expropriation as registered contractors.

23) Right holders notifying whether they can participate

24) Notification of the place and time of the reconciliation meeting to the right holder

If an agreement was reached in the reconciliation meeting;

- a. Preparation of purchase minutes to be signed in case of agreement
- b. Reconciliation minutes are sent to the relevant Land Registry Directorate and registration on behalf of the Treasury

If no agreement was reached in the reconciliation meeting;

- a. In case of no agreement, disagreement minutes are prepared
- c. Cost determination and registration case process
- d. Submission of the immovable parcel information to the legal unit, in which disagreement minutes are issued
- e. The Expert Examination Report of the lawsuits filed by the legal unit to the Administration

If an objection is to be submitted to the expert report and the objection is accepted;

- a) The Expert Examination Report of the lawsuits filed by the legal unit to the Administration

If no objection is to be submitted to the expert report and the objection is not accepted;

- a) The storage decision by the court to the Administration
- b) Submission of the receipt of the payment to the court
- c) The reasoned decision of the court comes to the administration

If there is no objection from the parties to the decision;

- d) If it is not certain in terms of registration, taking a court decision from the court
- e) If it is finalized in terms of registration, the registration process will be carried out at the relevant land registry offices according to the decision.

If there is objection from the parties to the decision;

- f) Submission to the upper court (Appeal-Supreme Court)

The flow chart summary of land expropriation process followed by GDoll is given in Figure 4-3.

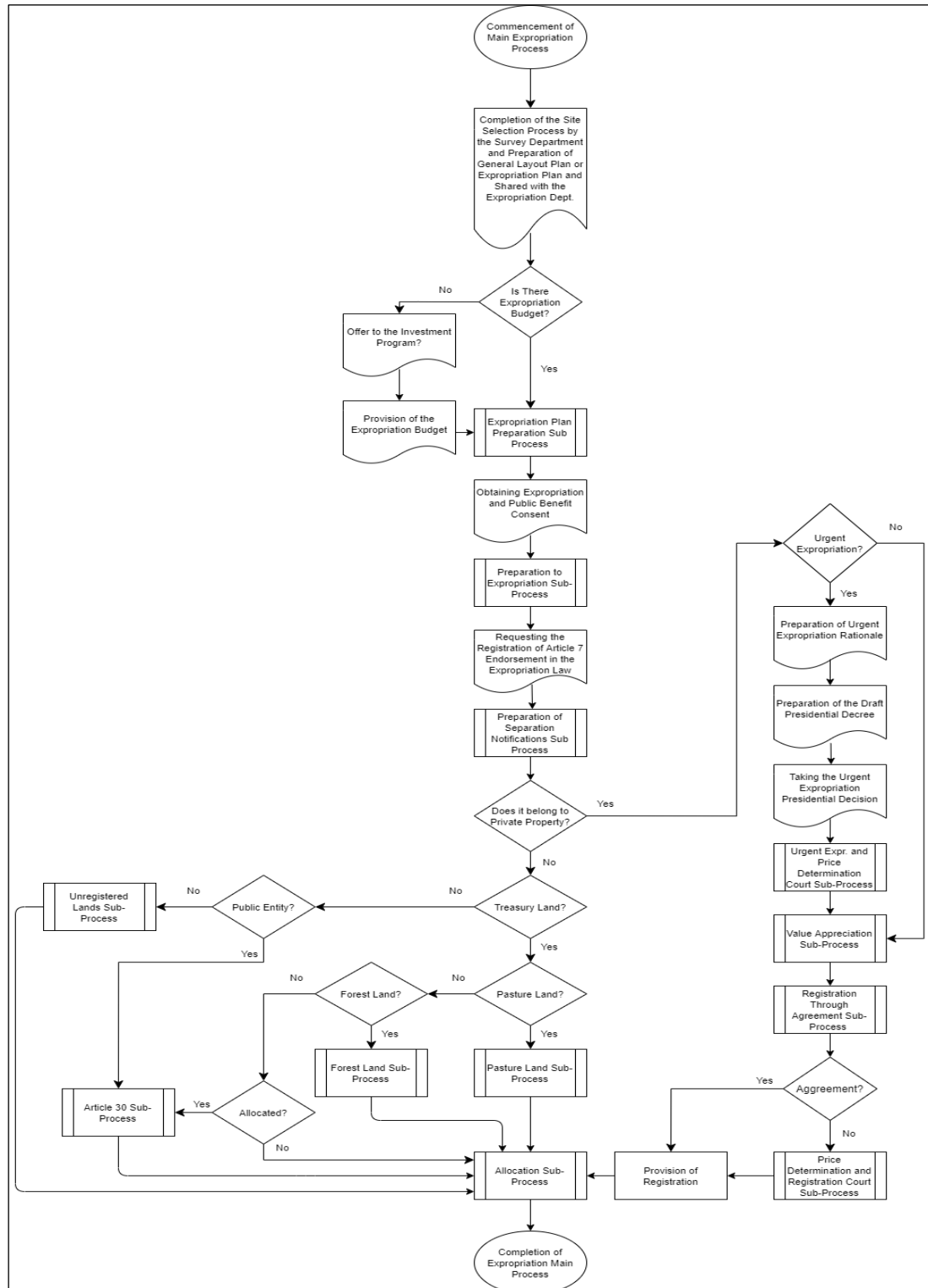


Figure 4-3 GDoll Land Expropriation Flow Chart

Resettlement program will be adhered to both the national laws for land acquisition and resettlement and WB ESS5. Where gaps exist between the national laws and the WB standards, gap filling measures provided in this RAP will prevail.

The following principles will govern land acquisition and easement to be conducted under the Project:

- GDoll will aim to achieve negotiated agreements on land acquisition with all PAPs based on the principles set out in this RAP. GDoll will negotiate fairly and openly with all PAPs to reach mutually acceptable agreements on compensation. Compulsory expropriation will only be undertaken as a last resort where negotiation fails.
- All land acquisition and resettlement activities will be managed through RAPs, including when there is physical displacement which means relocation or loss of shelter or structure and/or when there is loss of economic displacement which means loss of income or livelihood. Implementation results will be documented, monitored and, after completion, evaluated.
- Involuntary resettlement will be conceived as an opportunity for improving the livelihoods of the affected people and undertaken accordingly.
- Engagement activities regarding land acquisition will be carried out during relevant stages of the project according to SEP.
- Engagement and compensation will be carried out with equal consideration of women and men.
- Particular attention will be paid to households headed by women and other vulnerable groups, and appropriate assistance will be provided to help them improve their status. Additional consultations or regular information sharing will be provided for women specifically.
- GDoll will establish a grievance mechanism to receive and facilitate resolution of concerns regarding resettlement issues. This mechanism will allow women, disabled people, the elderly to reach GDoll easily.
- Land acquisition and RAP will be conceived and executed as a part of the Project, and the full costs of compensation will be included in Project costs and benefits.
- Draft land acquisition and resettlement plans will be consulted with affected people and other stakeholders, and their inputs/feedback will be taken into account in finalizing them.
- Compensation for lost assets will be at full replacement cost.
- Compensation and resettlement subsidies will be fully provided prior to clearance of right of way / ground leveling, demolition and any sort of construction activity.
- Upon completion of construction, temporarily used lands (for camp sites, storage areas etc.) will be restored as best as possible to its original condition in the event of temporary disruption so as to enable landowners/users/lessees to resume their pre-project activities.
- All PAPs, without regard to legal status of property, will receive support of various kinds, as per the principles set out in the Entitlement Matrix included in this RAP. Lack of legal title will not be a barrier to compensation and/or rehabilitation.
- GDoll will provide and prepare the plans for grievance redress and monitoring in line with WB policies and guidelines.

4.3. Transfer of Land Rights

The construction area of the Project remains within the expropriation borders, so there will be no temporary easement right under the Project. Land rights that will be obtained according to the Project components are given in the table below.

Table 4-4 Land Rights Required by Project Components

Project Component	Land Right	Provision	Duration	Responsibility
Project lines (railway, highway), art structures, stations and substations	Ownership rights	Land acquisition is permanent and ownership right is registered in the name of MoTI. As permanent facility shall be constructed on the referred land, it shall not possible for the former land owner to use the land.	Permanent	MoTI
Temporary & Associated Facilities (Camp Site, Storage Areas, access roads, Energy Transmission Line (ETL))	Contractual Rights through Rental Agreements	Subject land is rented for certain duration under mutually agreed terms and rates. Once the contract expires, land is handed back to owner after being reinstated to former conditions.	During Contract Period	Construction Contractor

Ownership Rights: Ownership rights mean permanent land acquisition. This includes railway, highway, all art structures, stations and transformer centers that will be built under the project. Land use rights are established permanently, it is no longer possible for the landowner to use the land. For the permanent transfer of property rights;

- Expropriation of private lands,
- The lands belonging to public institutions will be allocated to the project.

Contractual Rights through Rental Agreements: Rental agreements are concluded between the Contractors or sub-contractors and individual landowners for the temporary use of areas required for construction activities. Rental agreements may be concluded for any duration and are typically established for intermediate camp sites, storage areas, additional workspaces and others. After the termination of the rental agreements the land will be fully re-instated and handed back to the landowner(s).

4.4. Land Valuation Procedure

Valuation is the process of identifying the value placed on an asset for the purpose of calculating compensation. This is often regulated by national legislation but sometimes needs to be aligned with WB ESS5. In acquiring affected immovable assets GDoll will devote maximum effort to negotiate willing/buyer arrangements. GDoll will adopt the valuation procedure that is compliant with both the Court's valuation methodology (legal requirements) and with World Bank's ESS5. By considering these two methodologies and standards, GDoll ensures that the valuation results will comply with local procedures and international standards.

Under the Turkish legal framework, a valuation commission consisting of a minimum of three persons internally appointed by the agency responsible for land acquisition determines the estimated value of the immovable property to be expropriated, having regard to the information and documents to be obtained from expert persons, institutions and authorities (such as Provincial Directorate for Food, Agriculture and Livestock), the Ministry of Science, Industry and Technology, where necessary, and from local real estate agencies as per Article 8 of the Expropriation Law. Number of commissions can be more than one. The valuation commission determines the estimated ceiling values of immovable properties in the expropriation area. During the valuation of immovable assets or resources, valuation commission (and the expert commission designated by the Court) has to take into account the following valuation criteria, which are mentioned in Article 11 of the Expropriation Law:

- i. The nature of the immovable property or resource
- ii. The size of the immovable property or resource
- iii. All the characteristics and elements, which could affect the value of the immovable property or resource, including the individual value of each element
- iv. Tax declaration, if any
- v. Previous values of property determined by official bodies at the date of expropriation
- vi. For lands, the net income that could be derived from the immovable property or resource (without undertaking any changes, using the immovable property or resource in the same conditions as of the expropriation date)
- vii. For house plots, the amount for which equal (similar) house plots have been sold without any special purpose, prior to the date of expropriation
- viii. For structures, official unit prices (annually issued by the Ministry of Environment and Urbanization) at the expropriation date, calculations of the cost of building, and depreciation for wear and tear, and
- ix. Any other objective criteria that could affect the value of the property or resource

The legal framework protects the affected people in particular by ensuring that:

- No land will be used until compensation is paid
- Compensation is paid to a national bank account, or a trust account to be paid in three monthly periods in the event of disputed ownership to be paid to the person proved the ownership
- Market-based interest rates are charged for the value of the compensation if for any reason payment of compensation is deferred
- All ownership is recognized, including customary and traditional ownership
- Costs of due process are borne by GDoll, not by the affected people

The Law requires that potential income that can be generated from the affected immovable assets is taken into consideration in the valuation process; however, the concept of “replacement cost” is not reflected and depreciation is taken into account. Therefore, GDoll will explicitly allow for full replacement cost for buildings and will ensure that lost income is fully restored via the RAP Fund throughout the compensation process. For those vulnerable and with meager assets, additional income restoration measures may be designed, including provision of employment in construction works.

Calculations for Compensation Payments

Appraisal for Expropriation: Appraisal can be defined as a branch of science that teaches principles and criteria regarding properties, incomes and rights, to be followed on the basis of scientific methods.

The measures used for appraisal are called appraisal criteria. Appraisal criteria vary according to the type, purpose and marketing status of the property subject to appraisal. There are 2 criteria used for appraisal:

- i. Market price criterion
- ii. Income capitalization criterion

Both criteria are jointly used for appraisal during expropriation and partial expropriation proceedings. The appraisal expert will use a direct comparison method and take account of the latest purchasing/sales prices of plots similar to that subject to appraisal.

Factors affecting the value of a plot include:

- i. location
- ii. shape
- iii. physical structure of the soil
- iv. road frontage
- v. width of the road by the plot
- vi. restraining provisions of the city plan

A price survey is done by keeping in mind all the criteria listed above. A site visit will be conducted by a committee and will determine the prices. Agricultural engineers, civil engineers and property experts shall be assigned every year to form the committee. Appraisal experts will evaluate the average price per square meter - to be calculated on the basis of purchasing/sales prices of similar plots- by taking account of all the positive and negative features affecting the value of the plot subject to appraisal. In addition to the land market price, the committee will take into account the crop on the land and compensates crop loss without seed expense.

The formula used during valuation of the agricultural lands is $K = R / f$, where;

K = value (expropriation compensation)

R = net income (gross income-production costs) and

f = the capitalization rate (risk related to the capital invested in agricultural land)

After the market value is determined, additional fees for buying land will be considered and included before reaching the final replacement cost.

Going forward, each landowner will be surveyed and assessed for severity of impact and vulnerability. If landowner states that he/she will be vulnerable / not be able to maintain income after land acquisition, additional measures will be taken in line with the entitlement matrix to help them restore their income. This could include finding replacement land if they are farmers and claim to need help to get comparable land or other measures to help restore lost income.

A key factor determining land prices in small towns and city centers is their proximity to the city center or a road. Land or land parcels close to the city center or a road are more expensive than the others. In metropolitan areas, the value of a plot will be influenced by its location and, in particular its visibility and exposure to traffic. A plot situated at an intersection or featuring a broader angle of vision will be more valuable. Shape is also important, on the basis that well-shaped plots are more convenient for construction and soil characteristics will influence costs associated with preparing the land for foundations. Soil characteristics will also determine the need for the construction of an entrance floor and basement.

Income Capitalization Criterion

According to this criterion, the value of a property is calculated as the accumulation of the capitalization of net income or the total of average future incomes from that property up until the time of appraisal. Income capitalization criterion is often used for appraisal of agricultural lands. The most significant issue in conjunction with this criterion is the accurate determination of the yield of the land (net income) subject to appraisal and of the capitalization interest rate.

Net income (yield)

Net income is generally defined as the financial returns gained from the use of production items having a natural characteristic over a defined period of time. In other words, it is the revenue from a certain amount of money invested in works or rented lands over a defined period of time.

During the calculation of net income from agricultural lands, production value is determined on the basis of the yield of cultivated crops per declare and unit price of the crop. Net income is calculated by deducting total expenses necessary for the production of that crop from the resulting production value.

According to the existing rotational cultivation system applied in the land subject to appraisal; gross production value is calculated by multiplying crop output with the prices prevalent in the relevant year; net income is calculated by subtracting expenses associated with the product (annual operating expenses + 10% unknown expenses + 3% administration share + agricultural capital interest provision) from gross production value; annual net income is calculated by dividing the total net income by number of crops in the rotational cultivation system and the bare land value is calculated by capitalizing the net income (dividing by capitalization interest rate).

Since expropriation proceedings are realized over each parcel, land yield is calculated instead of farm yield. In relation to annual plants, land expropriation value is calculated over annual yield, and over total periodical yield gained throughout their economic lives for perennial plants.

- i. The formula used for capitalizing the net income from annual plants is, $S_o = s / f$
- ii. The formula used for capitalizing perennial periodical fixed income is, $P_o = p / qn-1$

The right to use unit capital invested in the land is called capitalization interest rate.

In order to determine the actual land yield; data on crop output, unit prices and costs should be collected from the producers in the region and Official Institutions. This way, after the land prices and yields close to actual values are determined, average capitalization interest rate will be calculated by dividing land yields by land sales prices (the same number of yields and land sales prices). Since land value and capitalization interest rate are in inverse proportion, land value will increase as capitalization interest rate decreases, provided that yield is stable. According to the Decision of Court of Appeals 18th Civil Panel, of July 01, 1993 No: 1993/262-531, capitalization interest rate ranges from 3% to 15% nationwide.

Land capitalization interest rate is significantly lower than the interest rates of industrial and commercial investments due to the fact that land is more reliable in yielding long-lasting revenue.

In order to determine a healthy, reliable and accurate capitalization interest rate, sales prices and yields of many lands should be known.

The calculated capitalization interest rate is the average interest rate and the appraiser will decide on increases or decreases by taking account of the positive and negative impacts on capitalization interest rate of the land. Positive aspects of the land will decrease the capitalization interest rate while negative aspects will increase the same.

Factors positively affecting capitalization interest rate and therefore decreasing the interest rate are as follows:

- i. Proximity to a city or town
- ii. Proximity to access roads (land, railway, airport)
- iii. Favourable health conditions
- iv. Favourable transportation conditions
- v. Buildings (if any) in good condition
- vi. Undivided land
- vii. Geometrically well-shaped land
- viii. Property safety
- ix. Ease of purchasing and selling
- x. Safety of landowner
- xi. Land registered before the cadastral office
- xii. High population densities
- xiii. Easily changeable rotational cultivation system
- xiv. Favourable irrigation conditions if it is an irrigated land
- xv. Small surface area

To ensure accurate calculations, appraisers firstly visit the expropriation area and in taking account of its current status of use, determine all the factors (soil structure, status of use, topography, climate, proximity to settlements and roads, favorable transportation conditions, location, current pattern of rotating plants in the region and whether or not irrigated and dry agricultural activities are carried out) that may affect the value of the relevant immovable property in accordance with Article 11 of the Expropriation Law.

In order to ensure that valuation of assets is in compliance with ESS5, in addition to the Turkish legal requirements listed above, GDoll will follow the Entitlement Matrix in Section 7 which details the entitlements that will be necessary for each type of loss that can be suffered by project affected persons.

Methods of valuing crops/trees

The value of the crop, including the value of time needed to reproduce such a crop, and the replacement cost for any investment made (input, labor etc.) will be considered for all requiring crop compensation. On the lands to be acquired, if the crops identified in, it is recorded first indicating its type and status and then production value of crops and the crop loss is determined by a committee composed by GDoll, headman of village (Mukhtar) and experts from Official agricultural Institutions. Payment for compensation is done in accordance with this assessment and valuation record. Owners/users will be compensated based on the market value of the crops on permanently acquired lands.

Valuation of trees are made according to the Junge method which considers the type/age of trees, rest of their economic lives, productivity, price, annual total income and coefficient according to income.

Orchards are very common in the Project area. In such cases, the value found for the trees will need to be added to the bare value of the land. Payments for trees, vineyards, etc. are made based on a calculation of the expected income from these for the rest of their lives;

with the recent changes, the Turkish law allows the payments to be made to both to the owners and users except in forest areas. As per international policies and the recent private sector practice in Turkey, people who have encroached to public and/or private land and planted trees and crops (or built immovable assets) are compensated for these assets (but not for the land).

The rental payments are considered to compensate for the inability of affected people to plant for the duration of the lease period. When permission is obtained to enter land, either through willing buyer/seller arrangements or through the court process, there may be standing crops on land. Standing crops may also be damaged from construction activity on land which was not included in the land acquisition process.

4.5. Resettlement Process

Resettlement Process is implemented according to Resettlement Law (5543) by Resettlement Department of Ministry of Environment and Urbanization (MoEU). GDoll will apply to this public institution in order to implement “state opted resettlement” process.

The first stage of the process was the identification of the PAPs subject to resettlement by GDoll during asset inventory and field studies carried out for the RAP preparation. These identified PAPs will be verified again during official asset inventory study in case of any possible changes. Then, the second stage of process will be receiving and evaluating applications by the MoEU according to the eligibility criteria specified by Resettlement Law. If the applications are determined as eligible, MoEU will request information from GDoll on resettlement process which monitored and supervised by GDoll (information on PAPs, ratio of resettlement etc.). If the application is not determined as eligible, MoEU will inform GDoll on the ineligibility. Upon the information provided by GDoll to MoEU, all resettlement process will be carried out by MoEU. After the evaluation and calculation process, MoEU will inform GDoll on the resettlement cost and finally GDoll will pay the resettlement cost to MoEU. Although the resettlement process will be carried out by MoEU, GDoll will coordinate with MoEU to ensure that the resettlement process is carried out in a timely manner since the WB standards do not allow for the construction to commence until all restorative measures taken for PAPs to be physically/economically resettled. Therefore, GDoll will ensure that all the resettlement activities and compensation/measures for resettled PAPs are completed before the commence of construction works on site.

4.6. Cut-Off Date

The cut-off date is the completion date of the Project's census and asset inventory studies. The person who occupies the project area after the cut-off date is not considered eligible for compensation and/or resettlement assistance support. Similarly, fixed assets (such as built structures, products, fruit trees and woodlands) that have been established after the completion date of the asset inventory or a mutually agreed alternative date will not be compensated. According to WB ESS5, "This cut-off date is normally the date when the census begins."

It is possible to set different cut-off dates for different project components. New cut-off dates can be determined for affected parcels in case of changes in the Project components.

The inventory studies for the Project' affected assets have been conducted between 14-17th of January 2020 and census survey between 7-10th February 2020. The scope of impact presented in this RAP is based on the result. Per national law, persons eligible to receive compensation as well as the exact scope of impact for which compensation will be paid have to be confirmed after the expropriation process has been initiated. Under this project, the final walkover survey will be conducted after the expropriation process is initiated but before

the start of construction, and all affected parcels, landowners and assets will be redefined. This RAP will be updated based on the result of the walk over survey, if necessary. The date when the walkover survey is conducted is the Cut-off date for the purpose of this project. DGoll will announce the survey two weeks beforehand so affected people are aware of it. As the construction phase was anticipated by DGoll to commence in the second half of 2021, it is envisaged that the expropriation process will commence in the second quarter of 2021. The person who occupies the project area after the cut-off date is not considered eligible for compensation and/or resettlement assistance support. Similarly, fixed assets (such as built structures, products, fruit trees and woodlands) that have been established after the completion date of the asset inventory or a mutually agreed alternative date will not be compensated.

4.7. Eligibility Criteria for Defining Various Categories of PAPs

The World Bank's ESS5 suggests the following three criteria for eligibility;

- i. Those who have formal rights to land,
- ii. Those who do not have formal legal rights to land at the time the census begins but have a claim to such land or assets provided that such claims are recognized under the national law,
- iii. Those who have no claim to land they are occupying or using.⁴

Those covered under first and second category are entitled to be either compensated or resettled for their losses according to the national legislation and will be compensated as per this RAP. Those covered under third category do not have some legal rights according to national legislation. But GDoll commits that they will also be provided with livelihood supports as stated in the RAP to achieve the objectives set out in ESS5 through the available sources and budget of GDoll. GDoll will cover additional supports such as; livelihood supports, compensation for loss of structures, animal feed, transportation costs, title deed costs etc. by using all facilities of public institutions. All project affected persons, irrespective of their status or whether they have formal titles, legal rights or not, will be eligible for some kind of assistance, if they occupied the land before the entitlement cut-off date.

4.8. Status of other components and project revisions

As stated in Section 2.2, the location and technical specifications of the Project components such as construction/camp sites, ETLs, quarry and material borrow pits are yet to be determined. Therefore, the impacts caused by ETLs, quarries, material borrow pits and construction camp sites are not included in RAP. As the construction is foreseen to start in the second half of 2021, it is necessary that Addendum to RAP studies be carried out by GDoll with the finalization of the locations of these project components and the preparation of expropriation documents by the end of 2020. The resettlement issues resulting from the undefined project components will be addressed with one or more addendum studies to this RAP, in line with the references given in this document.

Additional studies may also be required due to possible changes in the project route as situations that may lead to a route change are presented in the ESIA document. The need

⁴ World Bank ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

for such changes will be clarified after consultations are carried out with the following institutions:

- General Directorate of Cultural Heritage
- Hatay Agriculture and Forestry Directorate
- State Hydraulic Works (DSİ)

During ESIA field studies, the alternative access (route) plannings were discussed with the representatives of these institutions to receive their opinion and feedback about the Project. This feedback has been forwarded to GDoll after the field study and evaluated as presented below (Table 4-5).

Table 4-5 Alternative route feedback / questions of stakeholders

Feedback /questions	Explanations by GDoll
Why Existing line from Erzin station to the port does not pass through Leçelik which is a volcanic area? Would not this option minimize the damages to the agricultural lands?	There are some obstacles against this suggestion. Firstly, altitude of the line would increase and secondly this line would cut the public highways in two different points. This would create an extra expense which involved building two railway bridges. In the existing project public roads authority would not permit the construction of a second railway bridge. This would also eliminate a further acquisition of private lands. Apart from these there is a Kerkük and Yumurtalık pipeline in the vicinity and according to BOTAŞ regulations no constriction work would be carried out within 100 meters to the line. This also makes the application of this suggestion almost impossible. Besides current Project is planned upon the suggestions made by the State Waterworks (DSİ) to protect the water system in the vicinity. The current line also gives the upmost care to cause a minimum damage to the surrounding agricultural lands.
Erzin Port railway station damaging the fruit gardens.	The most important aspect of the project is the Port development as port company plans to develop new constructions. Therefore, it is inevitable that the development of Port railway station would cause some damage to the fruit gardens in the immediate vicinity.
Why the area between the current proposed station building and TAYSEB motorway junction is not used for the proposed railway station?	The land mentioned here is in the immediate vicinity of the Kerkük-Yumurtalık pipeline. As emphasized above the existing regulations do not permit any construction within 100 meters of the pipeline. Therefore, it is impossible to use the land mentioned here for any developments.

Source: ESIA field study, 2020

A management plan covering both locations of the project that are not yet known and possible revisions are presented in ESMP. As part of the Management of Change Process, new resettlement issues resulting from the components and revisions will be addressed with one or more addendum to RAP, in line with the references given in this report.

5. IDENTIFICATION OF PEOPLE AFFECTED BY LAND ACQUISITION

5.1. Landowners

People who have legal title to land and other assets (such as structures, trees, crops etc.) on affected lands have been identified through official records obtained from the local and national Registry Offices after the land acquisition requirements of the Project were finalized. According to the law, all landowners are entitled for compensation for their immovable properties. There is no provisioning for the compensation of livelihood losses for landowners in national law. Such losses will be covered through the available sources and budget of GDoll.

55 out of total 133 parcels affected by the land acquisition of the project belong to real persons as privately registered. Real persons and public institutions are shareholders in 5 of these parcels. 8 out of 55 parcels have ongoing court cases, the deeds are passive and no information on the owner/shareholders is available. The title deed registry of the 3 parcels has not been obtained yet while one of them is considered to be a private parcel according to field study. Thus, these 9 parcels will be considered as private parcels in following sections of the report as the individuals declared their ownership rights on these parcels during RAP field study. In this respect, the total number of Project-affected parcels owned by real persons is considered to be 63.

There are more than 766 individual shares in the 55 parcels whose title deed information is available. There are landowners who are deceased, even though they are registered in the land registry. Due to their successors, the number of shareholders on these parcels are likely to increase in an uncertain amount. Additionally, individuals coming forth to claim ancestral land are another group to be considered in the increase of entitled right holders. All such cases will be resolved and the final numbers of PAPs will be determined during the preparation of expropriation files. Though numbers will change, the potential impacts on potential groups and PAPs have been defined and set in the Entitlement Matrix provided in this RAP.

The below table shows the number of private lands with active title deed owned by real persons required for the Project. According to the table, a parcel registered in Sarımaşı has 5 shareholders. In Turunçlu, there are 384 shares in 37 parcels that are affected by the Project. Since the lands in the region belong to certain families, the number of people who are entitled as “landowner” for more than one parcel is high. As the same names (by checking the identity numbers and father names) with their ownership rights in different parcels are determined, it is seen that 37 parcels belong to 142 individuals in total (See Table 5-1).

Table 5-1 Number, shares and shareholders of private lands with active title deed owned by real persons,

Location	The number of private lands with active title deed	The number of shares	The number of shareholders	Qualification
ADANA CEYHAN SARIMAZI	1	6	6	- Road - Field
HATAY ERZİN TURUNÇLU	32	384	142	- Field - Plot - Canal - Orchards (citrus and olive)
HATAY ERZİN YEŞİLKENT	23	438	289	- Field - Road - Uncultivated land

Location	The number of private lands with active title deed	The number of shares	The number of shareholders	Qualification
				Orchads (citrus and olive)
Total private-registered individual parcels	55	828	437	

Source: Expropriation list provided from AYGM, 2020

There are repeating names in the title deeds registered in Yeşilkent. Accordingly, while the total number of shares of the 21 parcels affected by the project seems to be 438, the actual number of individual's shareholders is 289. It was determined that these shareholders are members of well-known families in Erzin. Among the 289 shareholders, there are only 37 different surnames. For example, surname "Keskin" - is observed 112 times.

As can be seen in Table 5-2, while the number of shares in the 55 private lands with active title deed is 828, the number of shareholders is almost half of the number (437). Considering the 3 parcels that have not been reached due to the lack of land registry records and 8 parcels (private lands with passive title deed) under court case process, the number of shares/shareholders is expected to be higher.

Owners of private lands with passive title deed are also considered to be "landowners" in the scope of this RAP. The ongoing cases on 8 parcels are with regards to inheritance transfer. Titles to the subject land are very old, yet have been included in PAP identification process and will be updated once the court process has transferred the title under rightful heirs. Additionally, another group that is unidentified due to lack of official land registration is determined as "user" rather than "landowner", who are the users of non-cadastral areas (NCA).

Table 5-2 Affected parcels that have uncertain ownership status (passive title deeds and non-cadastral lands)

Location	The parcels with passive title deeds		Non-cadastral areas (NCA) ⁵
	Parcels under court case	Parcels whose land registry is not available	
Turunçlu (in the vicinity of Yukarıburnaz village)	8 ⁶	1 ⁷	6
Sarımazı	0	2 ⁸	0
Yeşilkent	0	0	1

The lands shown in Table 5-2 will be evaluated as real person or public lands within the scope of this RAP. Accordingly, "Parcels under court case process" are evaluated as real person lands. 2 parcels in Sarımazı whose land registry is not available are evaluated as public lands and 1 parcel in Turunçlu is evaluated as private. Also, NCAs will be evaluated as public land and their ownership will be determined accordingly.

⁵ For detailed information on NCA, see Appendix-6.

⁶ According to the information obtained in the field study, these are considered to be private lands.

⁷ According to the information received in the field study, it is thought to be private land.

⁸ According to the information received in the field study, they are thought to be public lands.

5.2. Owners of immovable assets

5.2.1. Trees

Fruit trees such as oranges, tangerines, grapefruit, olives, carob, and apricot are common in the region. Citrus (orange, tangerine, and grapefruit) and olive trees were identified in the parcels affected by the land acquisition of the Project. The values of these trees are based on various characteristics such as age, species and fruitfulness. The subject lands include variety of trees ranging from ones that are young with yet, no produce, to economic trees which are over 20 years old.

There are identified citrus and olive trees in the 66 real person parcels affected by the Project. On the other hand, there were no PAPs observed on non-cadastral areas (NCA) and public lands that claim to own trees.

5.2.2. Structures

By law, titled landowners also have rights of the structures built on the land. These structures can be classified under the following: houses, barns, sheds, water wells etc. Users and beneficiaries of land who are not the owner of the land are also entitled to their own structures on the ground within the scope of this RAP. RAP defines the groups that have rights on structures as following.

- PAPs who are both owners of the land and structures on the land
- PAPs who are owners of structures on the land which they are users of
- PAPs who are owners of structures on the public lands and non-cadastral areas in which they are users of

Other structures affected by the project are those belonging to businesses that are located in parcels that belong to legal entities and treasury lands. These structures are buildings, facilities, warehouses, sheds, parking areas. The users of such structures may either be their owners or just users/tenants.

5.2.3. Other assets

There are also some other assets on the parcels in the project's area of influence. These have been observed as structures and materials related to the irrigation system, warehouses, natural assets (volcanic area called "Leçelik" and the water basin under it), and material storage areas. Their owners can be landowners, public institutions or land users. The canals and roads in the vicinity of the agricultural lands are under in the impact area of the Project. These are the assets in common use of local people.

5.3. Land users

The users of the lands and tree, structure, irrigation system etc. located on the land are also right owners within the scope of RAP. These users can be categorized in three groups: (1) formal (legal) users, (2) informal users, (3) agricultural vorkers and (4) beneficiaries. All groups are entitled to various rights within the scope of RAP.

The owners and users are not different persons in many of the affected lands. It was mentioned previously that agricultural activity is an important source of income for the landowners. As can be seen from Table 5-3, the owners of the orchards mostly use their lands themselves.

Table 5-3 Use of owned orchards

Type of use	N	%
Lands planted/cultivated by landowner	23	85.2
Produce owned by landowner through hiring of casual workers	1	3.7
Lands planted/cultivated by other shareholders	1	3.7
Some part of the land used by landowner; some part used by other PAPs without rental agreement	1	3.7
Lands planted/cultivated by other PAPs without rental agreement	1	3.7
Total	27	100

Source: RAP field study, 2020

5.3.1. Formal (legal) land users

Users of land and immovable assets can be classified as two groups: legal (formal) users and illegal (informal) users. Formal land users can be seen in both private and public lands. If these users are not the landowner (individuals, legal person or government), they make an agreement indicating the usage duration and conditions of the relevant land with land owner. The formal user groups identified within the scope of RAP are:

- Users who carry out agricultural activities in the land where they are owners or shareholders.
- Users (renter, partner, beneficiary etc.) who carry out agricultural activities by paying rental fee for the lands owned by other PAPs
- Users who carry out agricultural activities without paying rental fee with the permission of the landowner.
- Users who carry out agricultural activities on public lands by paying (rent, adequate price)

Agricultural activities in Erzin region are mostly carried out by landowners.

5.3.2. Informal land users

Informal users do not keep a legal document (deed or rental agreements) related to the private or public lands that they use. By law, illegal users may receive some compensation depending on the type of public land that they use (excluding pasture and forest land). Informal land users identified within the scope of RAP are:

- Users who carry out agricultural activities on public land without paying rental fees
- Users who carry out agricultural activities on the land belonging to private companies without paying rental fees
- Users who carry out agricultural activities on the land belonging to individuals without paying rental fees

As identified in RAP field study, there is one informal user who benefits from orchards in two private parcels (See Table 5-3) without rental agreement.

The rights of legal and illegal users on private and public lands is compensated in accordance with the law. It was mentioned previously that on both private and public lands there are citrus and olive trees providing income.

Some of the lands to be used for the Project do not have any title deed since no cadastral work has been carried out before for these lands. Some fixed assets and users were observed in some of NCAs that were not subdivided. PAPs, the user of these lands and the owner /

user of the assets on these lands, will be entitled to compensation/supports to be developed in this RAP. The main reason why these people are considered as public common land beneficiaries instead of informal users is that there is no formal registration of the lands. The fixed assets identified in NCAs evaluated within the scope of RAP and detailed in Appendix-6 are as follows:

- Fruit trees
- Various structures
- House, barn and shed belonging to a user
- Water wells

5.3.3. Agricultural Workers

Another group who earns income from agricultural activity, like formal and informal users, is agricultural workers. This group identified within the scope of RAP is as follows:

- Waged agricultural workers living in the region
- Seasonal agricultural workers coming from other regions
- Foreign (Syrian) workers

It is known that people who are under the category “Lands planted/cultivated by landowner” as given in Table 5-3, employ seasonal agricultural workers at harvest season. Waged agricultural workers living in the region rarely exist and were not identified in the affected parcels. There was only one person who carries out works of a family's farming grounds. However, he does not work for a fee; he collects produce as a formal user.

Since there was no harvest season, the situation of agricultural workers and Syrians could not be observed within the scope of RAP study. However, Entitlement Matrix also includes principles for these groups.

5.3.4. Beneficiaries of the common properties

Users of the pasture and forest lands do not have the right to receive compensation, so they are very likely to be negatively affected by the Project. The animal owners and herders use the grazing lands in the project area. This RAP defines measures for the compensation of such groups. The impacted beneficiary activities identified within the scope of RAP are as follows:

- Farmers who use pastures to graze their own animals,
- Herders who use pastures to graze animals which belong to someone else.

5.4. Owners of Businesses and employees

There are two business to be impacted by project activities. One of the two businesses is the owner of lands and all fixed assets which both of the businesses are established on. The other business however is currently the official tenant of the other business that owns the land and fixed assets. All equipment and machinery within the facility (that is considered the fixed asset on land) belongs to the tenant. The tenant is also among the clients of the business who owns the land. Both businesses carry out activities that require employing staff which will also likely result in the temporary loss of livelihoods due to relocation of businesses and temporary shut down.

5.5. Vulnerable Groups and PAPs that need special attention

Vulnerable groups that may be affected by the Project were formed with an understanding of the socio-economic profile and potential impacts during the ESIA studies. However, these

vulnerable group categories were redefined during the RAP preparation as a result of detailed analysis of PAPs and listed below.

- Physically or mentally disabled people
- People with chronic diseases
- Illiterate persons
- Elderly people over the age of 65 who live alone and need care
- Poor households
- Women, in particular female-headed households

“Women headed households”, any households “who do not own a land but use other lands in the village (by renting or without renting,” were not found during the household interviews conducted with the full-count method. Therefore, these groups are excluded from vulnerable group definitions.

Users of public lands, beneficiaries and (seasonal) agricultural workers, including Syrians discussed in the above topics should also be considered as vulnerable groups.

Vulnerable groups that may be affected by the Project were formed with an understanding of the socio-economic profile and potential impacts during the ESIA studies. However, as seen in the RAP study, there were other groups that need special attention:

- People who lose 20% of the total land assets that generate agricultural income due to land acquisition of the Project.
- Cumulative impacts on PAPs whose land has been already affected by other infrastructure or investment projects (highway, railway, oil or natural gas pipelines etc.) in the region and whose lands will be affected within the scope of this Project.
- PAPs subject to multiple impacts of the project (multiple lands affected by the land acquisition requirements of project components).
- PAPs left with unviable land due to project design and land take requirements of the Project.

6. SOCIO-ECONOMIC AND DEMOGRAPHIC PROFILE OF PAPs

Information on the current socio-economic status of the PAPs has been determined by analysing household surveys applied with full census sampling technique on parcel basis and presented in detail in this section.

6.1. Demographic Composition of PAHs

84.4% of the PAHs constantly reside in area where their land is located. While only one person reside in the affected settlement periodically, 13.3% of the interviewee reside in nearby settlements, not in the settlements affected by land acquisition (See Table 6-1).

Table 6-1 Residency Status of PAHs in Affected Settlements

	N	%
Residing permananetly	38	84.4
Residing periodically	1	2.2
Not residing here	6	13.3
Total	45	100.0

Source: RAP field study, 2020

The distribution of the PAHs, which participated in the surveys, according to the location of the lands affected by the land acquisition is given in Table 6-2.

Table 6-2 Distribution of the PAHs according to the location of the lands affected by the land acquisition

Province	District	Village/Neighborhood	N	%
Adana	Ceyhan	Sarımazı	3	6.7
Hatay	Erzin	Yeşilkent	17	37.8
		Turunçlu	25	55.6
Total			45	100.0

Source: RAP field study, 2020

PAHs participated in the surveys are entitled to different lands at the same time because they are users or owners of more than one land. Thus, information on 64 different parcels was obtained in 45 surveys. The distribution of these plots according to their usage types are presented in Table 6-3 and Figure 6-1.

Table 6-3 Usage types of parcels included in the survey study

Land use type	N
Uncultivated land	3
Orchard	44
Dry farming	4
Irrigated farming	11
Pasture	1
Pipeline	1
Canal	1
Total	65

When the distribution of the land use types of the land belonging to people participating in the surveys and affected by the land acquisition is assessed, it is seen that the 67% of the land affected is orchard. Irrigated agricultural lands are 17% and dry agricultural lands are 6%.

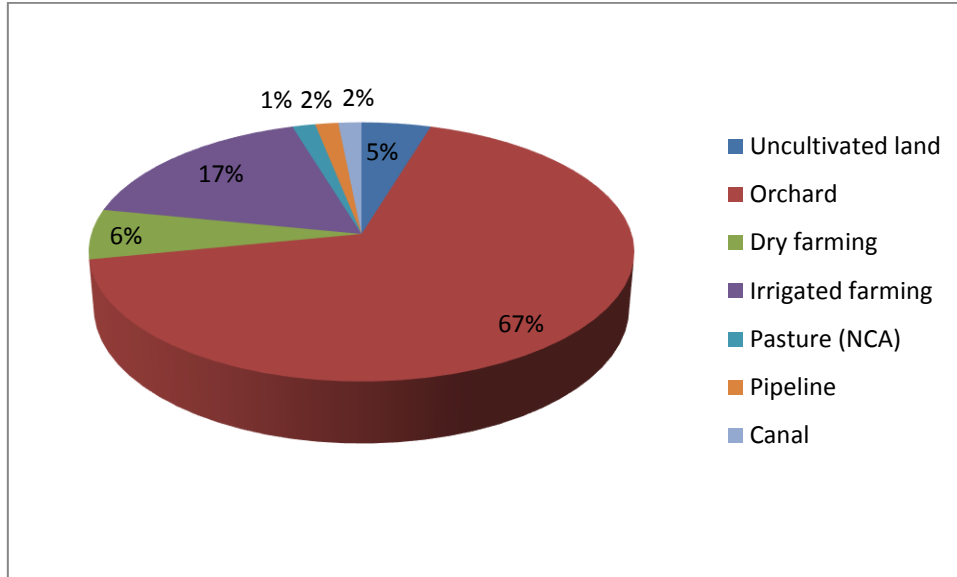


Figure 6-1 Usage types of the lands affected by the land acquisition (RAP field study, 2020)

The households participated in the survey are mostly nuclear families, consisting of parents and children. Considering the distribution according to household size, it is seen that 34.4% of them consists of 3-4 people and 31.3% of them consists of 5 people; while 2 people live in 9 households, 7 people live in 2 households.

Table 6-4 Demographic characteristics of the PAHs⁹

	N	%
Distribution of the PAHs according to household size		
2 people	9	28.1
3-4 people	11	34.4
5 people	10	31.3
7 people	2	6.3
Total	32	100
Distribution of household members according to age groups		
0-6	4	3.4
7-15	13	11.2
16-24	17	14.7
25-45	25	21.6
46-65	38	32.8
66-80	11	9.5

⁹ The HHQ surveys were shortened to be more feasible to be implemented in the phone due to time limitation, and thus, household characteristics were not asked in the phone surveys.

	N	%
80+	3	2.6
Total	111	95.7
Unanswered	5	4.3
Total	116	100
Distribution of household members according to marital status		
Married	64	55.2
Unmarried	28	24.1
Widowed	5	4.3
18 years and under	18	15.5
Unanswered	1	0.9
Total	116	100

Source: RAP field study, 2020

Demographic information of 116 people in total was obtained during the household surveys. Considering the age distribution of household members, it is seen that 25.9% of them are in school ages, 21.6% of them is young people, 32.8% of them are adults, 12.1% of them are advanced adults and elderly people. Regarding the distribution of the households according to their marital status, it is observed that 55.2% of them are married. Considering the distribution of household members by gender, 54% of them is male. (See Figure 6-2).

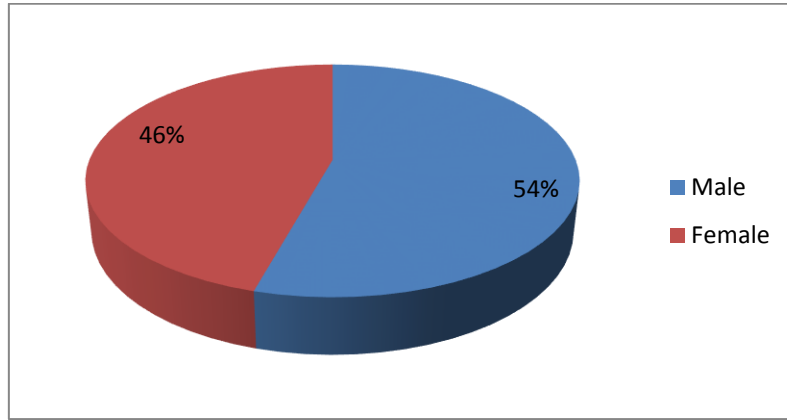


Figure 6-2 Distribution of households members according to gender

Considering the size of the residence, 37.6% of them lives in a house having size between 95 and 120 m², 28% of them lives in a house having size between 130 and 150 m² and 25% of them lives in a house having size between 160 and 250 m². 3 interviewee have not responded to the question.

Table 6-5 Size of PAHs' Residences

Size of the Residence (m ²)	N	%
95-120	12	37.6
130-150	9	28.2
160-250	8	25
Unanswered	3	9.4

Total	32	100
-------	----	-----

Source: RAP field study, 2020

When the distribution of household members according to educational status is evaluated, it is found that approximately 5 of them are not educated. 22.4% of the household members is primary school graduate, 6.9% of them is secondary school graduate, 24.1% of them is high school graduate, 5.2% of them is college and 6.9% of them is university graduate (See Table 6-6).

Table 6-6 Educational Status of Household Members

Educational status and level		N	%
Uneducated	Illiterate	5	4.3
	Literate	1	0.9
Educated	Primary school graduate	26	22.4
	Secondary school graduate	8	6.9
	High school graduate	28	24.1
	College graduate	6	5.2
	University graduate	8	6.9
NA		34	29.33
Total		116	100

Source: RAP field study, 2020

The distribution of students according to their education level is indicated in

Table 6-7. 5 out of total 25 students are away from their families while 4 of them are subject to bussed education.

Table 6-7 Education Level of Students in PAHs

Education Level	N	%
Primary school student	9	7.8
Secondary school student	1	0.9
High school student	6	5.2
College/University student	8	6.9
NA	91	78.4
Total	116	100

Source: RAP field study, 2020

64.4% of the household members have assurance under the SSI and Pension Fund, 19% have Agricultural BAG-KUR¹⁰ and 4.3% are covered by General Health Insurance. Members who can be considered vulnerable in terms of social security are 1 people who has a non-premium health insurance known as Green Card and 5 people who do not have any health insurance. 5.2% of household members have a disadvantage in terms of social security (See Table 6-8).

¹⁰ Social security organization for artisans and the self-employed.

Table 6-8 Social Security Status of Household Members

	N	%
SSI and Pension Fund	75	64.4
General health insurance	5	4.3
Green card	1	0.9
Agricultural BAG-KUR	22	19
No health insurance	5	4.3
No answer	78	6.9
Total	116	100

Source: RAP field study, 2020

6.2. Residency Status

According to the responses to the survey, 82.2% of the households reside in a house of their own, while 6.7% are shareholders of the house. 3 households are tenants of the house they reside in. 4.4 of PAHs live in a house owned by their close relatives without paying rent (See Table 6-9).

Table 6-9 Ownership Status of Residences

Ownership Status of the Residence	N	%
Owned by household with title deed	37	82.2
Owned by household with shared title deed (shareholders)	3	6.7
Owned by relatives, used without paying rent	2	4.4
Tenants	3	6.7
Total	45	100.0

Source: RAP field study, 2020

The potable water sources of the PAHs houses were questioned during survey. While 53% of the households thinks that the drinking water source is sufficient, 37% of them stated that it was insufficient. The distribution of drinking water according to the sources is shown in the below table. According to these data, 42.2% of the residences uses tap water, while 28.9% of them buys bottled water as drinking water. 4.4 of the households use water taken from the water tank and spring water. 22.2% of them has purification system to use tap water as drinking water.

Table 6-10 Potable Water Sources of PAHs' Houses

Sources of drinking water	N	%
Tap Water	19	42,2
Water tank	2	4,4
Spring water	1	2,2
Bottled water	13	28,9
Purification system	10	22,2
No answer	19	42,2
Total	45	100,0

Source: RAP field study, 2020

59 responses in total were received to the heating sources question and 41.3% of them was coal, 39% of them was wood and 15% of them was natural gas. There are 2 households who also use electrical heaters, air conditioning and solar energy as heating source and 1 household uses all of these sources. (See Table 6-11).

Table 6-11 Heating sources of PAHs' Houses

Household heating sources	Responses	
	N	%
Wood	23	39%
Coal	24	41%
Air conditioner and electrical heater	2	3%
Solar energy	1	2%
Natural gas	9	15%
Total	59	100.0%

Source: RAP field study, 2020

An assessment was made based on the opinions of PAPs on how much it would cost to rebuild the house they currently reside in. Accordingly, 40% of the households think that they can rebuild their house with a cost between 100,000 TRY-150,000 TRY (See Table 6-12).

Table 6-12 Value of the House of Residence

The cost of the their residences (TRY)	N	%
100,000-150,000	15	40
180,000-250,000	8	21
300,000-350,000	7	18
800,000	1	3.1
Unanswered	7	18.8
Total	38	100

Source: RAP field study, 2020

7 PAHs did not respond to this question, while 21% of them stated that the construction cost of the house would be between 180,000 TRY and 250,000 TRY, the other 18% of respondents mentioned that 300,000 TRY-350,000 TRY would be required for construction of their houses. One household has stated the cost of rebuilding his house to be 800.000 TRY.

6.3. Ownership of Property and Vehicles

Questions were also asked about the ownership of properties and vehicles of the households. The question "Do you have any other immovable property apart from house where you live?" was asked to the households and the distribution according to the answers is shown in the below table. Accordingly, 66.7% of households do not have any other immovable property. 20% of households have another house and 4.4% have a store/workplace (See Table 6-13).

Table 6-13 Ownership of Property other than the House of Residences

Possession	N	%
Yes- house	9	20.0

Yes - store/workplace	2	4.4
No	30	66.7
No answer	4	8.9
Total	45	100.0

Source: RAP field study, 2020

The other houses and stores of people are generally located in nearby settlements such as Erzin, Yeşilkent and İskenderun.

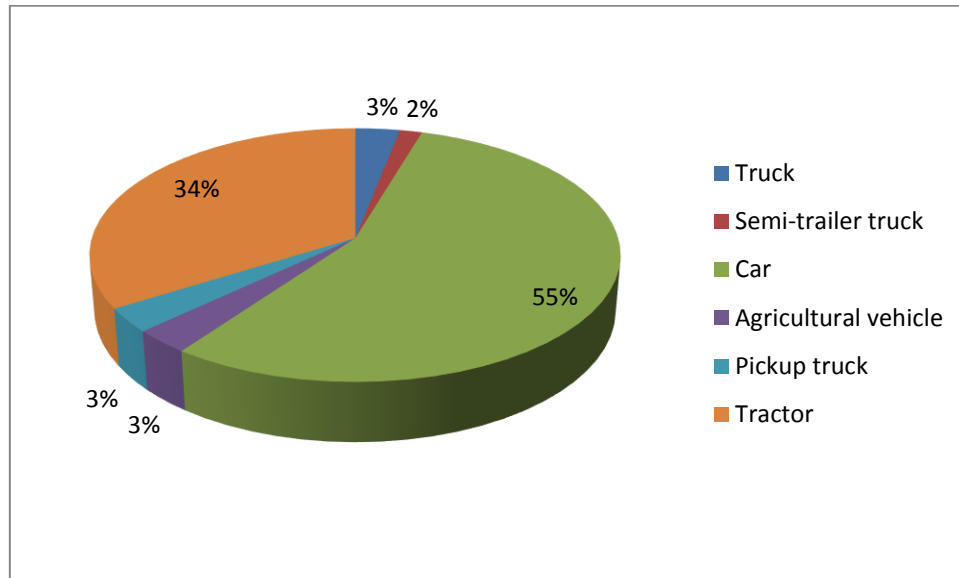


Figure 6-3 Vehicle Ownership among PAPs (Source: RAP field study, 2020)

The households were asked whether they had any vehicles. The answer to this question could not be obtained from 4 households. The remaining 39 households stated that they have one or more vehicles, while 2 of the households have no vehicle at all. There are 65 vehicles in total in 41 households. Considering their distribution of vehicles according to their types, it is noticed that the number of car owners and tractor owners is high (See Figure 6-3).

6.4. Income and Expenses

6.4.1. Income sources

Main and secondary income sources were asked to the project affected households. The responses of people to this question is presented in the below table. According to these results, agricultural income is at the top of the main income sources with ratio of 42.2%. Due to its regularity and predictability, 33.3% of people stated that their main income source is retirement pension (see Table 6-14).

Table 6-14 Main Income Sources of PAHs

Categories	N	%
Waged workers income	3	6.7
Salaried employee (White collar) income	3	6.7
Tradesman / Artisan / Trade Income	3	6.7
Retirement pension	14	31.1
Agricultural income (field)	5	11.1

Agricultural income (orchard)	12	26.7
Husbandry income	1	2.2
No answer	4	8.9
Total	45	100.0

Source: RAP field study, 2020

As can be seen from Table 6-14, main income source of 6.7% of households is waged workers income, while main income source of 6.7% of them is tradesman and trade income. The same people were asked in detail about the secondary income sources.

There were 25 households stated that they have one or more secondary sources of income, with a total of 33 responses. The sum of the responses given to questions related to secondary sources of income is indicated in Table 6-15. Accordingly, 88% of the 25 households that stated they have one or more secondary sources of income mentioned that agriculture is secondary sources of income. And also, 66.7% of the responses refers to agriculture. Retirement pension, periodic income, husbandry, rental income, transportation and social supports are also included in the secondary sources of income (See Table 6-15).

Table 6-15 Distribution of secondary sources of income

Categorizes	Responses		The ratio given in the sample
	N	%	
Retirement pension	4	12.1%	16.0%
Periodic/seasonal income	1	3.0%	4.0%
Agricultural income (orchard and field)	22	66.7%	88.0%
Husbandry income (sale of animals and animal products)	2	6.0%	8.0%
Rental income	1	3.0%	4.0%
Widower, fatherless child, disabled, elderliness pension	2	6.1%	8.0%
Transport business	1	3.0%	4.0%
Total	33	100.0%	132.0%

Source: RAP field study, 2020

It was observed that the households affected by the project have more than one source of income. 74 different sources of income in total were detected according to the responses of the households. When the both main and secondary income sources are evaluated, it is seen that 95.1% of the households have agricultural income, and nearly 44% of the households have retirement pension income. The percentage of households that have wages / salaries, trade, husbandry and rental income is presented in the “Response rate in total” column in Table 6-16.

Table 6-16 Both main and secondary income sources

	Responses		Response rate in total
	N	%	
Wage workers income	3	4.1%	7.3%
Salaried employee (White collar) income	3	4.1%	7.3%

Tradesman / Artisan / Trade Income	3	4.1%	7.3%
Retirement pension	18	24.3%	43.9%
Periodic/seasonal income	1	1.4%	2.4%
Agricultural income	39	52.7%	95.1%
Husbandry income (sale of animals and animal products)	3	5.1%	7.3%
Rental income	1	1.4%	2.4%
Widower, fatherless child, disabled, elderliness pension	2	2.7%	4.9%
Transport business	1	1.4%	2.4%
Total	74	100.0%	180.5%

Source: RAP field study, 2020

Annual income was asked to each participant household representative. When the revenues including all income sources, it is observed that annual earnings are between 10,000.00 TRY and 430,000.00 TRY. Although the revenues are tried to be calculated as including the expenses, the participants had difficulty in complying with this, especially in the calculation of agricultural revenues. In addition, government support for agricultural expenditures is not included in these income totals.

Considering the distribution of the households according to the total annual income, it is seen that the annual income of 35.5% is over 120,000.00 TRY. The same rate of household income is below 85,000.00 TRY (See Table 6-17).

Table 6-17 Distribution of households by total annual income

Annual Income	N	%
240,000.00 TRY +	6	13.3
Between 130,000.00 - 230,000.00 TRY	10	22.2
Between 120,000.00 - 85,000.00 TRY	9	20.0
Between 84,000.00 - 50,000.00 TRY	10	22.2
Between 40,000.00 - 10,000.00 TRY	6	13.3
No answer	4	8.9
Total	45	100.0

Source: RAP field study, 2020

Average annual income of the households affected by the project has been calculated as 133,000.00 TRY. This figure is divided into household size per person income is seen to be over the average of Turkey.

6.4.2. Expenses

The households were asked which areas they spent their household income mostly. Participants gave a maximum of seven answers to this question. There are a total of 133

responses obtained from 32 people¹¹. 21.8% of these answers are kitchen expenses, and 97% of the sample gave this answer (there were two people who did not answer the question). 20% of the responses is agricultural expenses and 90% of the households gave this answer. In other words, agricultural expenses indicate the importance of agricultural activity since agricultural expenses are important for 90% of the households. Heating expenses for 60% of households and electricity expenditure for 46% of them are important expense items.

Table 6-18 Expenses of PAHs by Spending Items

Spending Items	Responses		Response rate in total
	N	%	
Kitchen expenses (eating and drinking)	29	21.80%	96.70%
Heating expenses	18	13.50%	60.00%
Electricity and water costs	14	10.50%	46.70%
Personal needs (clothing, health, etc.)	6	4.50%	20.00%
Education costs	15	11.30%	50.00%
Credit / debt payment	15	11.30%	50.00%
Monopoly product cost	5	3.80%	16.70%
Agricultural activity expenses	27	20.30%	90.00%
Livestock expenses	2	1.50%	6.70%
Providing money to a close household member	2	1.50%	6.70%
Total	133	100.00%	443.30%

Source: RAP field study, 2020

50% of the households added their debt and credit payments to their spending items. Similarly, 50% of them allocated budget for education expenditures (See Table 6-18).

The households were also asked how much of their income was allocated to each item. Considering the distribution of households according to how much of their income is allocated for kitchen expenses, it is seen that 65.7% of the participants allocate between 20 % - 30% of their household income to kitchen expenses.

Table 6-19 Share of kitchen expenses in household expenses

	N	%
Between 10% - 15%	7	21.9
Between 20% - 30%	21	65.7
Between 50% - 60%	2	6.2
Unanswered	2	6.3
Total	32	100

Source: RAP field study, 2020

When how much of the household income was allocated for heating expenses is evaluated, it can be seen that 40.6% of the households do not consider this as an important expenditure item and 50% of them spend between 5%-10% of their income on heating. There is a similar distribution in electricity and water expenditures. While 53% of the households do not specify

¹¹ Spending patterns are considered to be representative therefore, expense questions were not asked to PAPs who were surveyed for the revision of the Project.

spending on electricity and water expenses as an important household expense item, 40.7% stated that they spend 5%-10% of their income on electricity and water expenses.

Table 6-20 Share of heating, electricity and water costs in household expenses

	Heating costs		Electricity and water costs	
	N	%	N	%
Between 5% - 10%	16	50	14	43.8
Between 15% - 20%	3	9.4	2	6.3
No expense	13	40.6	16	49.9
Total	32	100	32	100

Source: RAP field study, 2020

Considering the share of education expenses in expenses, the ratio of households who allocate between 40% - 50% of their household income is 9.4%. Approximately 22% of households spend between 5% - 10% of their household income, and 12.5% of them spend between 15% - 30%. 56.3% of the households does not have education expenditure in their households (See Table 6-21).

Table 6-21 Share of education costs in household expenses

	N	%
Between 5% - 10%	7	21.9
Between 15% - 30%	4	12.5
Between 40% - 50%	3	9.4
No expense	18	56.3
Total	32	100

Source: RAP field study, 2020

Debt payment is also an important expenditure item for the households. 53% of households stated that they do not allocate a share in household income to pay debts, while a household state that 60% their income was allocated for paying debts. 18.8% of the households allocates between 5%-10% of their income for paying debts while 24% of them spend between 20%-30% of their income for paying debts (See Table 6-22).

Table 6-22 Share of debt payments in household expenses

	N	%
Between 5% - 10%	6	18.8
Between 20% - 30%	8	24.0
60%	1	3.1
No debt payment	17	53.1
Total	32	100

Source: RAP field study, 2020

3 households stated that they deliver between 5% to 20% of their household income to a household member living out of the house. There are households that allocate budget in clothing, transportation, health, entertainment and Monopoly expenditure. 2 households stated that they spent 30% of their household income on livestock expenses. Agricultural expenditures have the largest shares in the household economy.

Agricultural expenses are not an important expenditure item for 6.2% of the households. In other households, some of the income is allocated to agricultural expenses. Accordingly, the proportion of the households who allocate between 10% - 25% of their income to agricultural expenses is 12.5%, the proportion of the households who allocate between 30% - 40% of their income to agricultural expenses is 31.3% and the proportion of them who allocate between 50% - 60% of their income to agricultural expenses is 34.4%. 2 households mentioned that they allocate between 70% - 80% of their income to agricultural expenses (See Table 6-23).

Table 6-23 Share of agricultural expenses in household expenses

	N	%
Between 10% - 25%	4	12.5
Between 30% - 40%	10	31.3
Between 50% - 60%	11	34.4
Between 70% - 80%	2	6.2
No expense	3	9.4
Unanswered	2	6.2
Total	32	100

Source: RAP field study, 2020

6.5. Land-Based Livelihoods

6.5.1. Agricultural Land Use

Almost all of the households are interested in agricultural activity as income. The types of land of these people have been observed. Among the households, there is nobody who states that he has a vineyard. 2 households have vegetable garden. Small-scale vegetable production is performed for their household consumption. 8 households have field. Five of them have dry agricultural land and their size varies between 5 m² and 25 m². There are 3 households that have irrigated fields. Dry and irrigated fields are cultivated by their owners and shareholders, or by third parties. Two of the households stated that they have lands that are not used for agricultural purposes (See Table 6-24).

Table 6-24 Types of owned lands

Types of land	No	Percentage in the sample
Vineyards	0	0%
Vegetable garden	2	4%
Dry field	5	10%
Irrigated field	3	6%
Orchard	37	76%
Woodland	0	0%
Land	2	4%

Source: RAP field study, 2020

It is seen that the land in the region is predominantly used as orchards and includes citrus trees such as orange, tangerine, grapefruit, lemon and olive trees. 85% of the households stated that they have orchards.

In the region, where agriculture has an important role among household income sources, it was also asked whether there are any lands they use for agricultural purposes although the

lands do not belong to them. 51.1% of the households declared that they use lands that they do not own or are not shareholders for agricultural purposes.

Table 6-25 Distribution of the households according to their use of the land they do not own or are not the shareholder for agricultural purposes

	N	%
Yes	23	51.1
No	17	37.8
No answer	5	11.1
Total	45	100.0

Source: RAP field study, 2020

26.7% of the households stated that they rented public lands for agricultural activity. 75% of these households rent orchard and the remaining households rent dry field.

Table 6-26 Type of public land rented for agricultural purposes

	N	%	Valid %
Dry field	3	6.7	25.0
Orchard	9	20.0	75.0
Valid Total	12	26.7	100.0
<i>Those who do not use treasury land and do not answer</i>	33	73.3	
Total	45	100.0	

Source: RAP field study, 2020

The total size of the orchards rented by these households is 194 decares and it can be seen that their size varies and range from 5 decares to 40 decares. There is no treasury land used by the households without paying rent.

22.2% of the households stated that they perform agricultural activities by renting private lands. While 70% of these households rents an orchard stated, 2 households stated that they rented dry fields and 1 household rent irrigated field. The total size of the agricultural lands, which are the private land rented by the households, is 682 decares and it is recorded that it varies between 7 decares and 400 decares.

Table 6-27 Type of private land rented for agricultural purposes

	N	%	Valid %
Irrigated field	1	2.2	10.0
Dry field	2	4.4	20.0
Orchard	7	15.6	70.0
Valid Total	10	22.2	100.0
<i>Those who do not rent private land and do not answer</i>	35	77.8	
Total	45	100.0	

Source: RAP field study, 2020

People who carry out agricultural activities were also asked about their irrigation system and multiple responses were received from these people performing agricultural activities

in more than one land. 36.2% of the irrigation resources is wells, 19.1% of irrigation resources is irrigation channels and 25.5% of the irrigation resources is DSI cooperative underground resources. Dripping system is used as irrigation system especially in Yeşilkent region. 42.5% of households use wells, 22.5% canal, and 30% DSI rource (Table 6-28).

Table 6-28 Irrigation systems used

Irrigation Sources	Responses		Rates in the responders
	N	%	
Well	17	36.2%	42.5%
River/creek/stream	1	2.1%	2.5%
Irrigation canal	9	19.1%	22.5%
Mains water	3	6.4%	7.5%
Other	1	2.1%	2.5%
Irrigation is not used	4	8.5%	10.0%
DSI Cooperative underground resource	12	25.5%	30.0%
Total	47	100.0%	117.5%

Source: RAP field study, 2020

6.5.2. Ownership of Trees

It is observed that the activities related to the soil in the region are mostly based on orchards. Tree ownership analysis of the households also support this situation. The trees owned by the households are usually citrus, olive, plum, peach, lemon, apricot, locust, medlar, walnut and pomegranate.

Table 6-29 Tree ownership status of the households

	N	The ration in samples	Total tree numbers of the sample	Average number of trees per supplier
Citrus	37	82.2	60,500 ¹²	1635
Olive	20	44.4	5,245	262
Plum	4	8.9	605	151
Peach	2	4.4	400	200
Lemon	2	4.4	60	30
Apricot	1	2.2	5	5
Locust	1	2.2	10	10
Medlar	1	2.2	10	10
Walnut	2	4.4	8	4
Pomegranate	1	2.2	60	60

Source: RAP field study, 2020

82.2% of the households said they have citrus trees, 44.4% of the households have olive trees, and 8.9% of the households stated that they have plum trees. There are one household or

¹² There are five people who do not respond.

two households having other trees. The total number of fruit trees owned by the households is also presented in

Table 6-29. When the ratio of the number of trees to the number of producers is evaluated, it is noticed that most of the products is used to earn income.

6.5.3. Agriculture and Garden Products

The number of people who earn income from the field and vegetable garden production in the region is less. This situation is also observed in the interviewed households. Few people perform dry and irrigated farming in the fields and gardens. While wheat, corn and sunflower productions are carried out in approximately 100 decares of land, tomato and vegetable productions are performed in the lands with the size of less than 1 decare.

Table 6-30 Cultivated field and orchard products

Product	The number of people cultivated	Cultivated land size (decare)
Wheat	6	50+
Corn	2	>1
Sunflower	3	40+
Tomato	3	>1
Vegetables, cucumber	3	>1
Onion and garlic	2	>1
Peanut	1	5
Melon and watermelon	3	2
Strawberry		>1

Source: RAP field study, 2020

It is seen that peanut and melon-watermelon productions contribute to the income of a few households. The households were asked about the income from the field and garden products and from which products they earned income. It is seen that produce from fields and gardens are used for household consumption and contribute to the income of some households.

Table 6-31 Distribution of the sample according to field and garden products

Product	N
Sunflower	2
Wheat	2
Corn	1
Peanut	1
Melon and watermelon	1
Strawberry	1

Source: RAP field study, 2020

5 households stated that they cultivate their land once a year, 3 households stated that this period is twice a year and 2 households said this period is three times a year and there is no land that is fallowed.

6.5.4. Livestock Activities¹³

The households affected by the project were asked if they have animals. While 5 households responded positively to this question, 83% of the rest of the households stated that they did not ranch (See Table 6-32).

Table 6-32 Distribution of the sample according to animal ownership

	N	%
Yes	5	16.7
No	25	83.3
Total	30	100

Source: RAP field study, 2020

It is seen that animal husbandry is not a major income source for most of the households. One of the 5 households that state that they have animals has 200 small cattles, while 3 households stated that they have 16 nols in total. The total number of fowl owned by all these households is 130 (the maximum number of fowl ownership is 100).

Households having small cattle and nols have their own barns. The size of barns varies between 10 m² and 500 m². Barns were built by using of various materials such as briquette, cement, tile, iron, zinc and stone.

In only one of the households, milk as an animal product is sold in case of excess amount of milk. The remaining milk and dairy products are used for household consumption.

Considering the distribution of nine responses regarding animal ownership according to how the animals are fed, it is seen that in the barn nearby the house and coop are mostly preferred. Only 2 households stated that pasture was used (See

¹³ Since the owners of the parcels affected by the revision were not engage with animal husbandry, the analysis was not renewed.

Table 6-33). Both people live Yukariburnaz village.

Table 6-33 Distribution of owned animals according to their feeding places

	N	%
In the village pasture	2	22.22
In the barn nearby the house	3	33.33
Coop	4	44.44
Total	9	100

Source: RAP field study, 2020

2 of the households earn income from animal sales. The total number of animals sold by a household last year is 5 goats, 5 sheep and 1 calf. The total income obtained is expressed as 10,500 TRY.

6.5.5. Usage of Common Properties

While the households do not use forest lands, 2 households stated that they used the pasture in their village to graze animals. It was stated that the people having address with Yeşilkent live in the district center. Pasture was used only by the beneficiaries living in Yukariburnaz village of Turunclu addressed parcels.

There is no forest among the lands to be used within the scope of the project. Therefore, HHQs applied within the scope of RAP do not provide sufficient information about the impacts on forest beneficiaries. According to ESIA, among the settlements within the study area of ESIA, Sarımazı is closer to the forest than other villages. Therefore, the study carried out under RAP preparation aimed to investigate if there were any income generating activities from nearby forest lands. Data collected reveals that only firewood is collected but there are no economic activities related to forest lands. Since the railway route does not limit any access to forest land there are no negative impacts anticipated from the use of forestlands.

6.6. PAPs' Perception of Livelihood and Suggestions for Improving Livelihoods

Based on the responses received from the interviewed households, their livelihood perceptions were examined. 51.1% of the households gave an "average" response to the question of which proportion they could meet their household requirements, while 40% of them stated that they had difficulty in meeting their household needs (See Table 6-34).

Table 6-34 Perception of PAPs on Economic Competency

	N	%
Average	23	51.1
Hard	18	40.0
No answer	4	8.9
Total	45	100.0

Source: RAP field study, 2020

71.1% of the households stated that their economic situation is getting worse compared to last year (

Table 6-35). The main reason for this can be considered as the increase in the prices of consumer goods according to country's economic conditions.

Table 6-35 Economic situation perception compared to last year

	N	%
Same	8	17.8
Worse	3	71.1
I do not know	1	2.2
No answer	4	8.9
Total	45	100

Source: RAP field study, 2020

The households were asked about the most important problems of their region. The total number of answers obtained in the question in which maximum 5 answers could be obtained for one person is 92. Among the most important problems, 48.3% of the households mentioned the unemployment problem, which constitutes 15.2% of all responses. Economic problems are important for 51.7% of the households and the ratio of the "economic problems" title in the responses is 16.3%.

24.1% of households included agricultural irrigation, 20.7% social facility deficiencies, 24.1% insufficient water infrastructure, 34.5% other infrastructural deficiencies in their "most important problems" lists.

Table 6-36 Most Important Problems of the Region According to PAHs¹⁴

Categorizes of important issues	Responses		The response ratio to prefer
	N	%	
Unemployment	14	15.20%	48.30%
Economy (livelihood, low income)	15	16.30%	51.70%
Incomplete / insufficient infrastructure (electricity, sewerage)	10	10.90%	34.50%
Agricultural irrigation	7	7.60%	24.10%
Access to the center	2	2.20%	6.90%
Access to the field	3	3.30%	10.30%
Education services	4	4.30%	13.80%
Health services	4	4.30%	13.80%
(internet, mobile phone network)	2	2.20%	6.90%
Waste	1	1.10%	3.40%
Social facilities (astroturf etc.)	6	6.50%	20.70%
Inadequate shelter conditions / heating conditions	1	1.10%	3.40%
Insufficient of agricultural areas	4	4.30%	13.80%
Insufficient drinking water infrastructure	7	7.60%	24.10%
Security	2	2.20%	6.90%

¹⁴ It was found sufficient to present the general problems of the region and solution offers through a sample that it represents. Therefore, these questions was not asked to the parcel owners who were affected by the revision.

Categorizes of important issues	Responses		The response ratio to prefer
	N	%	
Others	10	10.90%	34.50%
Total	92	100.00%	317.20%

Source: RAP field study, 2020

- Other significant problem topics that fewer people stated are as follows:
 - Issues related to infrastructure and services
 - Transportation to the city
 - Educational services
 - Health services
 - Communication (internet, mobile phone network)
 - Waste
 - Insufficient shelter conditions/heating conditions
 - Natural gas
 - The roads
- Environmental issues:
 - Flood risk
 - Air pollution
 - Environmental pollution (because of industry)
 - Using of coal and facilities
- Problems related to the agricultural activities and the lands:
 - Transportation to the land
 - Insufficient agricultural areas
 - Product evaluation
 - The fact that agricultural products are worthless
 - Cadastral problems
 - The expropriations
- Social issues:
 - Justice system
 - Security
 - Lack of playground
 - Foreign immigration

The households were asked about their ideas on improving livelihoods in the region. These responses are feature of providing additional measures. The total responses of the participants are 79. The most provided responses with a rate of 21.5% are related to measures to reduce agricultural costs. 63% of the participants request decreasing the prices of agricultural inputs such as seeds, pesticide, fertilizers and diesel oil.

The second most provided responses with a rate of 20.3% are related to increase agricultural investments and supports and also 59.3% of people thinks that this is a good livelihood improvement strategy. Furthermore, the rate of people who think fruit growing should be supported is high.

Table 6-37 Suggestions of PAPs to Improve Livelihoods

	Responses		The percentage of people giving response
	N	%	
Livestock supports	10	12.70%	36.00%
Greenhouse cultivation	2	2.50%	7.40%
The fact that agricultural inputs become cheaper (cheap seed, pesticide, fertilizer, diesel oil etc.)	17	21.50%	63.00%
Agricultural investments and supports	16	20.30%	59.30%
Supporting fruit growing / horticulture	14	17.70%	51.90%
The cooperative system	4	5.10%	14.80%
Training courses	4	5.10%	14.80%
Business establishment support	8	10.10%	29.60%
Employment opportunity	2	2.60%	7.40%
Protection of existing land	2	2.50%	7.40%
Total	79	100.00%	292.60%

Source: RAP field study, 2020

The rate of people who think that livestock supports is an important attempt to improve their livelihoods is 36%. While a few people provide suggestions on agricultural activities such as greenhouse cultivation and cooperatives, two people think that existing land should be protected. It is seen that support for business establishment is expected to be provided more than providing training courses or employment opportunities (See Table 6-37). One person thinks that establishment of syrup factory is able to create agricultural activity-industry corporation.

7. POTENTIAL IMPACTS OF PHYSICAL AND ECONOMIC DISPLACEMENT

7.1. Physical Displacement Issues

7.1.1. Housing and Residential Structures

While there are some houses on the lands needed for the construction of Yukarıburnaz Station, physical displacement was avoided by changing the station location as a result of re-planning. A house located in the non-cadastral area (NCA1), a barn and a shed is still under influence during the asset inventory study conducted by GDoll and examined within the scope of RAP. Owner of these structures affected by the Osmaniye OIZ - Erzin Port Line was contacted within the scope of the RAP study.

In another parcel whose land registry has not been reached yet (Parcel No. 1178), the used barrack style structures used seasonal under the influence of Erzin Port station - TAYSEB Free Zone station Line draw attention (See Appendix-5b Sequence no: 16). It is understood that these are not permanent residences. However, both GDoll officials and RAP field workers who monitor their determination do not have on-site identification of these structures. As a result of the determination of the official assets related to the buildings, the losses of the right holders will be compensated in line with the principles of RAP.

7.1.1.1. Physical resettlement of a house

Owner of the house and his family live in the house built outside the cadastral area in 1990, on the edge of the pasture. The household head stated that the house does not have a title deed and can be built for 300,000 TRY under current conditions. However, the drinking water supply of this house is insufficient. The household has no other property. There is a stable which is under the impact area of the Project, next to the house, which is made of briquette, cement and tile, was built in 1990 on the borders of Yukarıburnaz village and on the edge of the village pasture. At the same time, the household produces dairy, butter, cheese and eggs for household consumption, by using poultry near the house. In addition, a hut and a cluster are also affected.

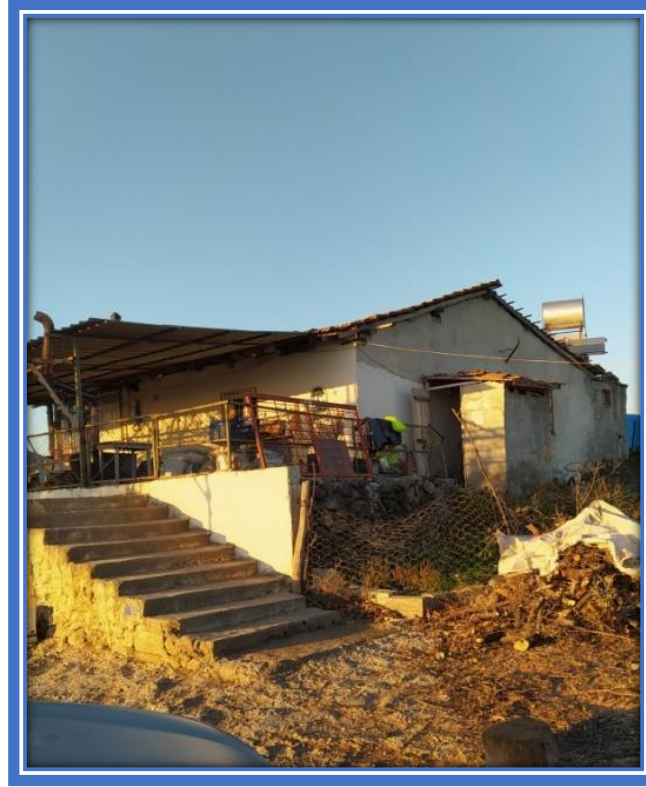


Figure 7-1 The house subject to physical resettlement

Since the owner was engaged in animal husbandry, he built his house near the pasture (See Appendix 6 Row no. 1). Physical resettlement, which will take place due to the fact that his house is within the scope of the project, will also cause him to move away from his economic resources. His home on land, where he does not have legal rights, and livelihoods such as barns, coops and proximity to pasture are affected. Useful information from the owner is summarized in Table 7-1.

Table 7-1 Demographic and socio-economic characteristics of household

Number of people in the household	5 (4 male 1 female)
Building under impact	House, barn, hut and outbuilding
Construction years of structures	1990
Size of house	150 m2
Number of rooms in the house	4
Cost of building house (in today's value)	300,000.00 TRY
Size of the barn	500 m2
Construction materials of the barn	Briquette and concrete
Source of the drinking water	Sterile with water meter
Quality of water source	Inadequate Why: unhealthy
Source of heating	Wood and coal
Other ownership apart from the current house	No
Livestock	200 sheep

	100 chicken
Source of animal fodder	Grazing land in the vicinity Manufactured animal fodder
Reasons for milk production	Domestic consumption
Reasons for butter and cheese production	Domestic consumption
Reasons for egg production	Domestic consumption
Vegetable garden	50 m2 House garden
Variety of vegetable	Tomatoes; green vegetables; onions; melon and watermelon
Vegetable production	Twice a year Domestic consumption
Agricultural production	No
Fruit production	Yes 8 decares
Irrigation system for fruit garden	Well water (1 water well)
Expectations for livelihood support	Subsistence for the cost of animal husbandry
Being affected by another land acquisition project	No
Employment expectancy	Yes
Curious about	What would happen to the house? Would they have a suitable accommodation where they could continue with animal husbandry and related activities?

Source: RAP field study, 2020

7.1.2. Non-residential buildings

There are also some other assets on the parcels in the project's impact area. In their use, it is necessary to get information and opinions from institutions. Some of the assets identified in GDoll officials' field work and RAP research are:

- Irrigation systems owned by DSI in Yeşilkent,
- Water tanks belonging to Ceyhan Municipality,
- High voltage line pylon in Osmaniye Tuyuzlı (Parcel No. 245/2),
- BOTAŞ pipeline in Adana Ceyhan,
- The water basin under the Leçelik region (Parcel No: 9055) (See Appendix-5c Sequence No. 4),
- Solar energy panel (Parcel No. 413), which belongs to Yusuf Gök and is located on public land,
- Water wells belonging to various owners and users,
- Stored materials (Lint Parcel No. 245/2) and coal stocks (Sarımazı Parcel No. 1935 and 1519).
- Yumurtalık water pump (Parcel No. 430)

The canals and roads around the agricultural lands are affected. In addition to these, the risk of roads and crossings to be blocked by local people has been addressed in the ESIA. Due to railway construction, passages to pasture and agricultural lands will be prevented.

Leçelik region is not positioned in the project footprint. Therefore, land acquisition from that region will not occur.

7.1.3. Businesses

7.1.3.1. Structures

Other structures affected by the project are those belonging to businesses located in legal entity parcels and Treasury lands other than public lands. The structures that will need to be relocated due to the Yumurtalık Free Zone station are presented in Table 7-2.

Table 7-2 Fixed assets of Businesses to be displaced

Structures to be displaced	Owner of the assets	User of the assets
2 built-in silos 2 septic tanks (60 m ³) Sheet roof of Packing building (1050 m ²) 2 double precipitation ponds (32 m ³) 50 m ² plant building 30 m ² weighbridge operation building 48 m ² weighbridge area 5 m entry ramp 5 m exit ramp 350 length 2" galvanized pipe for field watering system 40, 2" sprinklers (jet sprinkler) Hydrophore system (ball valve, nipple, sleeve etc.) 400 KW Transformer and general boards	Süper Enerji Inc. Co.	Süper Enerji Inc. Co.
Administrative building (300 m ²) Bathroom, ward, dining hall building (400 m ²) Packing building (except sheet roof) (1000 m ²)	Toros Tarım Inc. Co.	Süper Enerji Inc. Co.
An observation hut (3 m ²) in Parking Area Two small administrative buildings with one floor (12 m ²) in Parking area	Toros Tarım Inc. Co.	Large vehicles that bought goods from/to Torosport which is the port of Toros Tarım Inc. Co.

Source: RAP field study, 2020

According to Table 7-2, the land and buildings of Toros Tarım were transformed into a coal processing plant by Süper Energy. Therefore, Süper Enerji will not be able to receive expropriation payment from land and buildings. There are also some small buildings in the park area owned by Toros Tarım (See Figure 7-2).



Figure 7-2 Structures in Toros Tarım I.C. Parking Area

7.1.3.2. Physical Displacement of Super Energy Coal Processing Plant

Super Energy Coal Depot and Processing Plant Inc. is operating across Yumurtalık Free Zone. This facility will be displaced since it is located on the land where a train station will be built in the scope of project.

The company is located in an area of 56 acres performing packaging and market distribution activities for coal transported by sea to Turkey from abroad. The company has five branches throughout Turkey.

The screening and packaging processes are carried out on the premises where the facility is located. A total of 30 staff; 26 blue collar and 4 white collar personnel currently work at the facility. Depending on the workload throughout the year, an additional 10 blue collar workers (seasonal workers) are likely to join the team periodically. The entire personnel consist of men except one white collar woman employee. The facility operates 8 hours a day with almost no overtime hours, which are rarely performed. Since there is no public transportation to the region, a personnel bus is provided for the staff who comes to work.

Table 7-3 Personnel of Süper Enerji

Personnel	Number
Operations Manager	1
Deputy Operations Manager	1
Secretary	1

Foreman	1
Unskilled Worker	26
TOTAL	30
Seasonal Workers	10
Total	40

Source: SIA field study, 2020

There are no employees under the age of 18, whereas the age distribution of the personnel is as follows: 27 people between the ages of 18-50, and 3 people above the age of 50. Most of the personnel come from Sarımazı and Dört Yol. There are also personnel coming from surrounding districts such as Erzin, Osmaniye and Ceyhan.

Information provided by the operations manager states that local people are given priority in recruitment and assistance was received from the Employment Agency for the recruitment of unskilled positions. The company does not have health personnel. Regular (annual) health screenings are carried out due to highly hazardous work. Occupational health and safety services are provided by a third party company. The company conducts regular inspections and trainings.

Under its investment plans (within the next three years), the company has a washing facility project that will increase the quality of the product and the business potential of the company. The washing facility, which is planned to be established within the current land, is expected to improve the quality of the product and increase the company's competitiveness creating additional employment opportunities.

The operation manager was asked questions about relocation plans in case of displacement due to the project. Detailed information was obtained about the features of the area and facility they needed. The financial values of the said structures are presented in Annex 9. In order to sustain current operation, majority of the criteria listed below should be met simultaneously. If these criteria are not met, the operation will need to change (i.e. the type of transport to bring coal may have to change). Key criteria to maintain operation is as follows:

- Necessity to be close to the port,
- Necessity to be close to highway connection roads,
- The need to be away from the residential area,
- Necessity to be an industrial land,
- The need to be away from agricultural land,
- Necessity to be allowed for coal processing.

The relocation of the facility would require the transportation method to change which would result in additional operational costs for the company. Some of the cost items anticipated due to the relocation of the facility are as follows:

- Reconstruction of the facility (necessary physical structures)
- Infrastructure investments for the new facility area (water, sewage etc.)
- Transportation costs of machinery such as sieving, packing, weighbridge
- Differences occurred in personnel transportation costs
- In case new location is not owned by the business itself, differences in rental expenses
- Cost of permits and licenses to be obtained for the new location and additional

- Consultation costs for any documents that need to be prepared (i.e. feasibility and EIA studies etc.)
- Costs that will be born to prevent livelihood losses of current employees
- Any other loss that the business would suffer do to closure or relocation of business

The facility features required for the establishment of a similar business are listed below. Costs of these features have been listed by the owner and the manager of Süper enerji and presented in Appendix 9.

- 65 decares of concreted land
- Covering the land boundaries
- Administrative building (300 m²)
- Bathroom, ward, dining hall building (400 m²)
- Packing building (except sheet roof) (1000 m²)
- 2 built-in silos
- 2 septic tanks (60 m³)
- Sheet roof of Packing building (1050 m²)
- 2 double precipitation ponds (32 m³)
- 50 m² plant building
- 30 m² weighbridge operation building
- 48 m² weighbridge area 5 m entry ramp 5 m exit ramp
- 350 length 2" galvanized pipe for field watering system
- 40 2" sprinklers (jet sprinkler)
- Hydrophore system (ball valve, nipple, sleeve etc.)
- 400 KW Transformer and general boards

The primary choice of Super Energy was the use of public land next to the area where the station will be built (See Figure 7-3). This issue was discussed with GDoll officials, but it was learned that such a revision was not possible due to the BOTAŞ pipeline.



Figure 7-3 Empty public land between free zone highway connection and Super Energy

In addition, there may be some job losses due to the cessation of activity during the relocation. It is learned that approximately 100 vehicles (100 truck drivers) enter and exit for transportation to the facility daily (2,500 vehicles per month). Estimating that the approximate cost of the move may be \$ 130,000. Operations manager stated that they are not prepared for this type of calculation and will enter into planning in the event of an official notification.

In the event of Super Energy's job loss due to the railway station, its customers, distributors, Port owner Toros operation, transport truck / truck owners and drivers will be affected indirectly. It is thought that customers may start working with other companies if the shipment stops.

Süper Enerji is also an important customer of Torosport, which belongs to Toros Tarım. Super Enerji's relocation from the port and ending its operations would also cause Toros Tarım to experience loss of income as well.

7.1.3.3. Physical Displacement of Parking Areas

During project design efforts were made to avoid the displacement of physical structures. Though some were avoided to a certain extent the project's land requirement will create the need to relocate some parking areas. A car park owned by Kron Filter Industry and Trade Inc. (Parcel No. 113/3) in Osmaniye OIZ and a logistic parking area in the ownership of Toros Tarım Inc. in Adana Ceyhan Sarımaşı (Parcel No. 1428) will be physically displaced.

Among the users of these affected structures are the employees and clients of the mentioned businesses. In case alternative lands can be provided for the parking areas, impacts on operations can be avoided without any loss of work.

The parking areas have some small structures that will also need to be relocated. Supports to dismantle, transfer and re-assemble the physical structures of Toros Tarım Inc. was

evaluated within the scope of this RAP. If final design concludes that the parking area of Krom Inc. will be used for the station location, the entrance door of the factory can be moved to another side of the building. These costs have been included in EM in the following section.

7.2. Economic Displacement Issues

Majority of the impacted lands (83%) to be used for the construction activities of the project will require a less than 30% of the lands to be used. Figure 8 below shows the proportional distribution of lands impacted by the project according to the percentage of land lost. Since the proportion of lands lost to the project are not so high, economic displacement and impacts on livelihoods are expected to be significant.

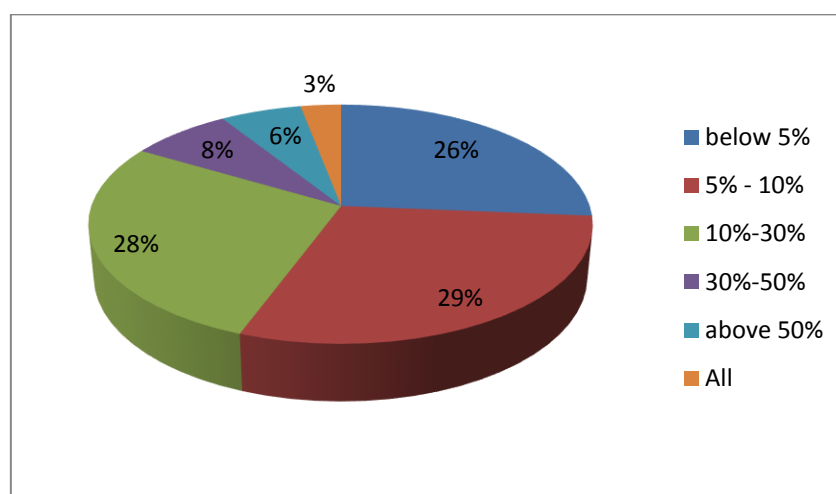


Figure 7-4 Distribution of affected parcels by acquisition rates

While assessing the impacts on land-based livelihood it is important to consider factors such as the number of shareholders, types of users and if there is any unviable piece of land due to project implementation.

30% to 50% of 10 parcels will be used for project construction. The socio-economic impacts that may arise from the acquisition of the parcels, which are among the household income sources used at this rate, may have medium or high impacts when combined with other factors. Some of these factors are the diversity of the livelihoods of the household, the place of agricultural activities in these resources or the total land assets, whether there is a cumulative impact with other project impacts. Again, it is important whether the land is divided by land ownership and user types, and whether there is an unviable land left.

Table 7-4 Distribution of all parcels affected by the project according to the usage rates in the Project

The ratio of the expropriated amount to the parcel size	Number of Parcel	Percentage
Below 5%	35	26%
5% - 10%	39	29%
10%-30%	37	28%
30%-50%	10	8%

The ratio of the expropriated amount to the parcel size	Number of Parcel	Percentage
More than half	8	6%
All	4	3%
TOTAL	133	100%

For both landowners and users, the highest negative impacts occur when more than half or all of the land is procured. However, within the scope of the Project, there is no parcel belongs to real persons under this measure. Only one unviable parcel (63 m²) has remained from an infrastructure project that belongs only to real persons and has a canal on it that will be acquired by GDÖİİ. This acquisition can even be positive for parcel owners.

It is seen that parcels belonging to legal entities are used at higher rates than parcels belonging to individuals. This situation causes the physical and economic displacement of those engaged in formal and informal agricultural activities and beneficiaries of public joint property on the lands owned by the Treasury and private companies.

7.2.1. Loss of Land Assets

The loss of land assets implies that the right to permanent use of land is taken from private individuals. The amount of land that needs to be acquired and belongs to individuals is 397,064.80 m². It is noteworthy that 70% of the impacted private parcels will need to be expropriated at a low rate (less than 10%). For an aggregate view of acquisition amounts on parcel basis, please see the summary list in Appendix-8.

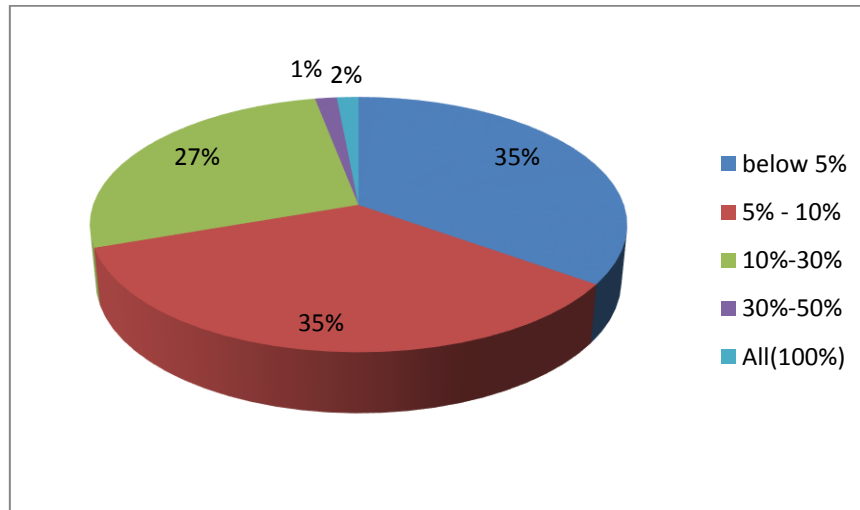


Figure 7-5 Distribution of affected lands by acquisition rates

There is a parcel planned to be used more than 30% (2%), While 10% to 30% of 28% of individual parcels are needed. It is noteworthy that while there is no need for more than half of the parcels to be purchased within the scope of the project, an entire parcel will be taken. Acquisition of the parcel, which is in the middle of the road and should be expropriated completely under normal conditions, may be affirmative for the parcel owners. The size of the parcel no 1733 in Adana Ceyhan Sarımazı is 13,449.93 m² and it can be seen that it belongs to six shareholders. It can be seen in Appendix-4a (Sequence no.1) that there is no structure or tree on the parcel other than the highway.

Table 7-5 Distribution of private parcels owned by real persons according to the usage rates in the Project

The ratio of the expropriated amount to the parcel size	Number of Parcel	Percentage
Below 5%	23	35%
5% - 10%	23	35%
10%-30%	18	27%
30%-50%	1	1%
More than half	0	0%
All	1	1%
TOTAL	66	100%

In private land acquisitions below 5%, low socio-economic impacts are expected on the landowners. Shareholders are not known due to the ongoing lawsuit on three of these parcels, all of which are located in Hatay Erzin. However, the owners of these lands were reached through the researchers conducted in the field study within the scope of RAP. When lawsuits are concluded, entitlements will arise.

5% to 10% of 35% of individual parcels are needed. The number of parcels that should be used at this rate is 24 and all of them are in Hatay Erzin. The total size of land acquisitions at this rate will be 89,371.70 m². However, one of the remaining parts of some plots is unsuitable for use and economic evaluation (unusable part). In these cases, expropriation of the unviable parts in consultation with the owners will be proposed. All cases of unviable lands are presented in Appendix 4 and summarized in Appendix 8. MoTI will provide information about unviable land rights in the consultation with the owners of the affected parcels. This issue will be addressed in expropriation notifications.

The rate in a parcel that belongs to individuals and where the expropriation is required at the highest rate is 33.94%. Within the scope of the project, there is no individual parcel needed higher than this. The parcel no. 6606, located within the borders of Hatay Erzin Yeşilkent, has been affected by this rate as it has a shape parallel to the line route. The parcel has 49 shareholders and there are citrus trees in the land. One of the 49 shareholders of the parcel is Mahmut Bölükbaşı. The parcel has the name of Bölükbaşı in the registry of the Chamber of Agriculture. It shows that he is engaged in agricultural activity in this parcel. Although he was abroad, a phone call was made.

Orchards addressed by Yeşilkent and Turunçlu are situated in Erzin-Dörtöyl plain which is designated as "Great plain protection area" with the decision of the Council of Ministers numbered 2018/11338 in 2018. This factor should be taken into account during land valuation and market purchase and sale records should be taken into consideration. Sales advertisements on the internet provide approximate information on the subject. According to the current sales prices in Yeşiltepe neighborhood, the prices of square meters of fruit orchards vary between 40 TRY and 60 TRY. At these prices, many features such as location, product type, age of the trees are effective (please see Figure 7-6 for sample sale listings).

	TUVA MEMOS EMLAKTAN BOTAŞ YOLUNDA SATSUMA BAHÇESİ 📌	17.000	714.000 TL	42 TL/m ²	14 Şubat 2020	Yeşiltepe Mh.
	GÜVEN EMLAKTAN KARAHÖYÜKTE BAHÇE 📌	30.600	1.683.000 TL	55 TL/m ²	15 Şubat 2020	Yeşiltepe Mh.
	TUVA MEMOS EMLAKTAN YEŞİLTEPE KARŞISINDA MANDALİNA BAHÇESİ 📌	6.500	295.000 TL	45 TL/m ²	11 Şubat 2020	Yeşiltepe Mh.
	AHMET AKİDAN BOTAŞ YOLU CİVARI 10 DÖNÜM MÜSTAKİL BAHÇE 📌	10.000	525.000 TL	53 TL/m ²	10 Şubat 2020	Yeşiltepe Mh.
	TUVA MEMOS EMLAKTAN GÖZENELERDE MANDALİNA BAHÇESİ 📌	20.000	800.000 TL	40 TL/m ²	10 Şubat 2020	Yeşiltepe Mh.
	ATATÜRK ÇİFTLİĞİNE YAKIN BAHÇE 📌	30.000	1.560.000 TL	52 TL/m ²	03 Şubat 2020	Yeşiltepe Mh.

Figure 7-6 Erzin Yeşiltepe neighborhood citrus garden sales listings

7.2.2. Land Fragmentation

The division and partial expropriation of the lands in terms of land ownership can sometimes cause a loss in the value of the land. Therefore, in some projects, this impact is tried to be reduced by land consolidation work before expropriation. There is no planned land consolidation under this project.

Railway projects have a decreasing impact, not a value increase. Therefore, the decrease in value on the remaining parcels also participates in the valuation process.

In linear projects, land is divided into two or more pieces. In such cases, sometimes one or more of the remaining pieces of land may become unviable. Reasons for a land to become unviable can be due to the following:

- The remaining piece is too small¹⁵
- Limited or no access to the remaining piece
- The remaining part becomes unviable with cumulative impacts

Some lands will be left with unviable parts due to the land requirements of the project. As assessed by satellite images, 21 parcels are not divided with only one single piece of land remaining. Due to the fact that the route is designed to move through the plots, one of such plots whose edges or corners are likely to be affected resulting with an unviable piece due to cumulative impacts. The parcel no. 6206 in Hatay Erzin Yeşilkent has only roads and the shareholders are finances with the individual (See Appendix-4c Sequence no: 18).

¹⁵ In some projects, parcels under 1 acre are considered unviable. In this RAP, no specific size is specified for the unviable part, it is recommended to make an consultative decision.

Table 7-6 How many pieces of individual parcels are divided and the possibility of unviable parts

After land acquisition;	The remaining piece may be unusable	No unusable parts	Total
One piece remains	1 ¹⁶	20	21
It is divided into two parts	28	13	41
It is divided into three parts	2	0	2
The whole parcel is taken	NA	NA	1

The number of private plots divided into two parts is 41 and the number of unused parts is 28. There is a potential for unusable parts on the two-person land, which is divided into three parts because the line passes twice. It is necessary to decide on which size and disabled lands will be counted and taken unusable parts by establishing an expert commission and in consultation with the rights holders.

Table 7-7 Cumulative impacts related to unviable land

Parcel	Province	District	Quarter	Total (M ²)	Expropriation (m ²)	Percentage	Ownership
6206	HATAY	ERZİN	YEŞİLKENT	81,481.59	478.12	0.59	Real and legal persons (public institution) shareholder
1733	ADANA	CEYHAN	SARIMAZI	13,466.87	1,960.81	14.56	Real person

The cumulative impacts related to unviable land issue are that affected parcels are also affected by highway projects. Two parcels with this feature are presented in Table 7-7. The effects of the two projects had an unviable impact. The location of the parcels in the table relative to the railway line is presented in the Figure 7-7 and Figure 7-8.

¹⁶ Due to cumulative impacts



Figure 7-7 Parcel No.1733 (ADANA-CEYHAN-SARIMAZI)



Figure 7-8 Parcel No. 6206 (HATAY-ERZİN-YEŞİLKENT)

7.2.3. Access to Land Problems

It was mentioned in the ESIA report that the division of the land or the progress of the line between the parcels may also have some negative impacts on agricultural activity. Situations related to access barriers that cause economic resettlement are summarized as in Table 7-8. Both the division of lands and the closure of existing roads can reduce access to lands and increase costs on income generating activities.

Table 7-8 Situations that will prevent land access

Topic	Temporary impacts	Permanent impacts	Groups under influence
Division of private agricultural land	Difficulty in accessing the rest of the divided lands due to construction activities	Limitations on transportation to the opposite side of the divided agricultural lands due to the railway line	- Users of owners - Stakeholder users - Only users (tenant, partner, etc.)
Division of public agricultural land	Due to construction activities, illegal users have difficulty in reaching the rest of the divided lands.	Illegal access of users to the railway line to reach to the agricultural land on the other side of the railway line	Illegal users
Pasture division	Due to construction activities, illegal users have difficulty in reaching the rest of the divided lands.	Access to the opposite side of the pastures divided due to the railway line	- Livestock farmers - Shepherds
Closing of roads to private agricultural lands	Cost increase due to preventing passage from villages to lands during construction phase	Increase in costs due to the prevention of transitions from villages to lands during operation phase	- Users of owners - Stakeholder users - Only users (tenant, partner, etc.)

Topic	Temporary impacts	Permanent impacts	Groups under influence
Closing of roads to private agricultural lands	Cost increase for illegal users due to the prevention of transition from villages to lands due to construction activities	Illegal users increase costs due to preventing transitions from villages to lands due to the built railway	Illegal users
Closing of roads leading to pastures	Prevention of passage from villages to pastures with animals due to construction activities and increased costs	Due to the constructed railway, preventing passage from villages to pastures with animals and increasing costs	- Livestock farmers - Shepherds

The transition of the villagers to agricultural lands or pastures can be interrupted in two ways due to the project activities; (i) temporarily due to construction works; (ii) permanently due to the railway line.

7.2.4. Restriction in pasturelands

Pasture use is important for Yukarıburnaz village. There is no livestock in other settlements affected by land acquisition. 9 responses were received from the households interviewed during the RAP field study on animal ownership. Two of these households stated that they used pasture near the village. These are two persons living in there. As can be seen in the ESIA study, there are other households in the Yukarıburnaz that use pastures. The location of the pasture used can be seen in Figure 7-9 . The location of the station in the image was changed and pasted to prevent physical resettlement. Therefore, there will be a contraction in the pasture area.

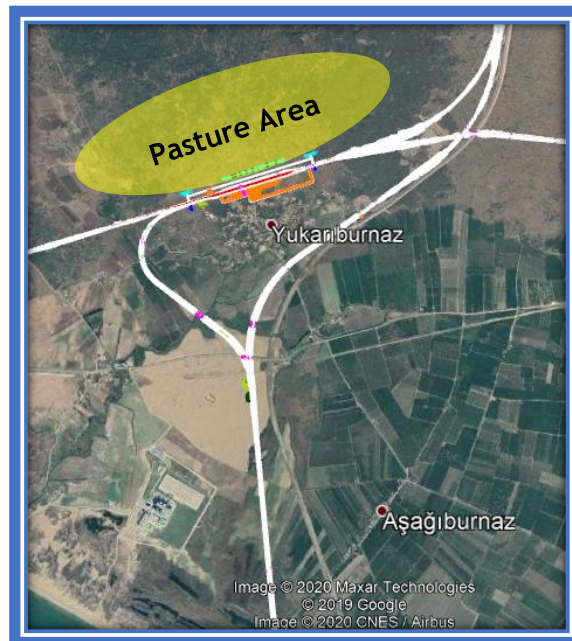


Figure 7-9 Agricultural lands and places of pastures used by Yukarıburnaz villagers

There is no use of forests within the scope of the project. Therefore, there is no economic displacement in this regard.

7.2.5. Loss of trees and products

Fruit trees such as oranges, tangerines, grapefruit, olives, carob, and apricot are widely available in the region. Citrus (orange, tangerine, and grapefruit) and olive trees were identified in the parcels affected by the land acquisition of the project. The values of these trees are based on various characteristics such as age, species and yield. Users of trees that yield are at risk of losing their economic resources.

Table 7-9 Distribution of the parcels under the influence according to their identified characteristics

Characteristic of land	Number
Roads, canals or empty lands	10
Real person parcels with citrus garden (several of them also have olive trees in the area of influence)	43
Fields	10

The asset inventory study and satellite photos by GDOII show that the individual parcels belong citrus trees within the impact area. It is seen that the quantity of tree is under the influence of the parcels that will be acquired at rates below 5%. As the amount of acquisition increases, the number of trees that need to be cut also increases. As can be seen in the sample images below, many trees are expected to be affected in parcel 427, while several trees are expected to be affected in parcel 994. Images related to other affected parcels can be seen in Appendix-4.

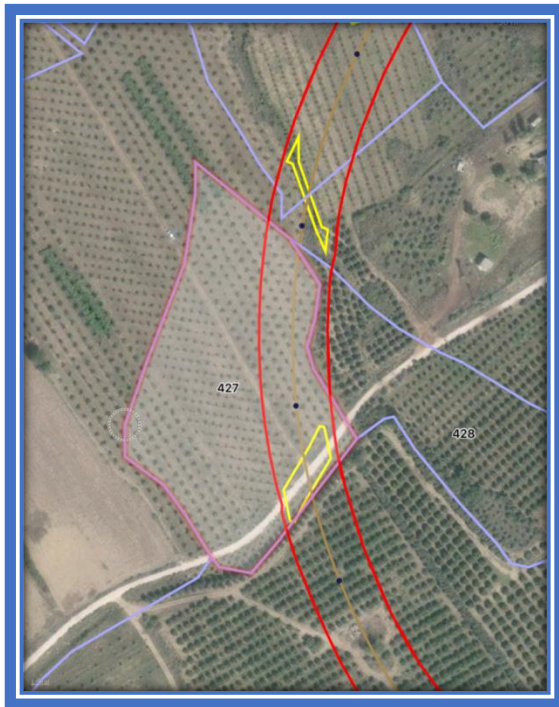


Figure 7-10 An example of a plot where high tree loss



Figure 7-11 An example of a parcel with low tree loss

However, the presence of fruit trees are not limited to individual parcels. Fruit trees will also be lost in public lands and in non-cadastral areas. RAP includes similar compensation suggestions for trees in lands without personal title deed, as in individual parcels. According to the information received from Erzin Agriculture and Forestry District Directorate, citrus

products grown in the region are orange, tangerine, golden ball and lemon. The most prominent subspecies produced around Erzin Yeşilkent are Vaşinkton, Freemonth (Pileymut in colloquial language) Satsuma.

7.3. Vulnerable Groups and PAPs that need special attention

7.3.1. Vulnerable groups

While there are no disabled individuals among the household members, 1 poor (has Green Card), 8 chronic patients and 2 elderly who need care were identified.

In such projects where stakeholder participation is important, it is possible to define those who are illiterate as a vulnerable group. In the survey study within the scope of RAP, it was determined that 4.3% of 116 household members whose information was received were illiterate. There is a possibility that there are illiterate people among the rights holders.

7.3.2. Agricultural Workers

Agricultural workers work periodically in difficult conditions in the region. Çukurova region is an important source of income for agricultural workers working intensely in citrus production. Erzin was recorded as one of the places where seasonal agricultural workers took part in the first organized action (1974). Another indicator of their intensity in the project area is the "Erzin Seasonal Agricultural Workers Assistance and Solidarity Association", which was established in Erzin in 2019. The authorities of this association could not be reached within the scope of RAP field study. As can be seen from the media, the Erzin District Governor stated that they had difficulties in finding interlocutors while working on seasonal agricultural workers and Syrian agricultural workers, and that the association would fill a significant deficiency in this regard.¹⁷ Therefore, the association can be considered as a stakeholder within the scope of the project.

Refugees living in nearby settlements have not been identified but are known to be in provincial centers and temporary accommodation centers. There are no Syrian refugees residing in the project area (towns and villages).

Due to the intensive agricultural activity, the region offers the opportunity to earn income from seasonal agricultural work for Syrian refugees. The proximity of Hatay to the Syrian border is another factor that increases the possibility of Syrian refugees migrating for job opportunities. RAP surveys have revealed that seasonal workers from the eastern provinces are likely to work during harvest season on project affected lands compared to local workforce. However, Syrian workers have also taken the place of workers coming from the eastern provinces in recent years. According to information collected via headman interviews, approximately 2,000 Syrian refugees may be employed during the harvesting season for the lands within the scope of the project as seasonal agricultural workers. The start of construction after harvest will have less impact on agricultural workers. In case the construction works and the fruit harvest coincide, these seasonal workers which also include Syrian refugees will need to be consulted in line with SEP and measures shall be taken to avoid any livelihood impacts on these groups. Printed and visual material used for communication should be prepared in Turkish and Arabic.

¹⁷ New on official website of Erzin District Governorship: <http://www.erzin.gov.tr/ilcemizde-yeni-kurulan-erzin-mevsimlik-tarim-iscileri-yarimlasma-ve-dayanisma-dernegine-ziyaret>

7.3.3. PAPs losing more than 20% of the total land assets

PAPs who lose more than 20% of their total land holding which they generate an agricultural income and who do not have any other source of livelihood will receive subsistence support under this RAP. Therefore, when calculating the 20% rate, the effect of more than one parcel should be taken into consideration. The exact number of people who would lose more than 20% of their total land holding is to be confirmed during the official asset inventory study, however, it is expected the number will be very few since majority of the PAPs have additional lands and the linear nature of the project will require small sections of lands to be provided to the project. A relatively high impact can be observed on users of land rather than landowners.

7.3.4. Users of the lands belonging to legal entities

Project-affected parcels owned by legal entities are registered in the name of treasury, public institutions or companies. These legal entities are as follows;

- Treasury
- Public common property
- Ceyhan OIZ
- General Directorate of Highways
- DSI
- BOTAS
- Toros Agriculture Industry and Trade Inc. (Erzin)
- Tosçelik Profile and Galvanize Industry Inc. (Erzin)
- Ser Fuel Distribution and Trade Inc. (Erzin)
- Yeşilyurt Iron and Steel Industry (Erzin)
- Kron Filter Industry and Trade Inc. (Osmaniye)

In the interviews within the scope of RAP, informal usage of such lands were not encountered (including public lands). Public and private lands that belong to legal persons are rented and used.

In addition to these, there are non-cadastral parcels that do not have a title deed and are not registered as public land. Agricultural activities in these lands are carried out informally. Explanations regarding the locations of the non-cadastral areas and satellite images are presented in Appendix-6 and the income generating trees and product assets on them are determined.

7.3.5. Cumulative Impacts

Vulnerability can also be an issue to consider under the cumulative impacts. PAPs impacted by previous investment projects may also be impacted by the project. Same parcels or other parcels owned by these PAPs may be subject to land acquisition. In such cases, the amount of land lost for multiple projects may impact the land-based livelihood of these PAPs. Another cumulative impact can be that multiple projects may impact the value of land decreasing its market value or resulting in unviable pieces which are no longer used by PAPs.

The plots under cumulative impacts are presented in Appendix 8. As can be seen in detail in Appendix 8, the cumulative impacts have been observed in 18 parcels. These plots have been affected by other infrastructure projects. At the same time, the owners and users were also asked whether any land they have was affected by a previous project. The rate of being affected by another project is around 50% (See Table 7-10). The reason for having such high rates is that there is an ongoing industrial development in the region as mentioned in detail in the project ESIA.

Table 7-10 Being affected by another project

	Frequency	Percent	Valid Percent
Yes	22	48.9	55
No	18	40	45
Valid Total	40	88.9	100
No answer	5	11.1	
	45	100	

Source: RAP field study, 2020

Four people stated that their fields and 13 people stated that the orchard was also affected by other projects.¹⁸ These are land acquisitions for motorway, power plant, channel projects and industrial investments.

It is seen that the incomplete highway project in Asağiburnaz, which has been emphasized within the scope of ESIA, has created a cumulative impact. It has been observed that some parcels were evacuated with no active utilization and still registered under the names of individuals. This impact should be taken into account during consultations in particular for parcels numbered 1144 and 1150 with citrus trees.

Another vulnerability may be caused due to multiple lands of the same PAP being impacted within the scope of the project. In Turunçlu¹⁹ addressed parcels, there are 384 shares in 37 parcels that are affected by the Project. Since the lands in the region belong to certain families, the number of people who are entitled as “landowner” for more than one parcel is high. When same names (by checking of Turkish identity numbers and father names) with their ownership rights in different parcels are determined, it is seen that 37 parcels belong to 142 individuals in 384 shares in total. Number of PAPs whose multiple lands are impacted by the project have been identified via HHQ and shown in Table 7-11.

Table 7-11 Number of PAPs with multiple lands impacted

Category	Number of entitled persons
Number of people who have only one impacted land	17
Number of people whose 2 lands are impacted	9
Number of people whose 3 lands are impacted	6
Number of people whose 4 lands are impacted	4
Number of people whose 5 lands are impacted	3
Number of people whose 6 lands are impacted	1
Number of people whose 7 lands are impacted	3

¹⁸ Halil Ünal, İsmail Güçlü (on behalf of Tüzün Güçlü), Bekir Aydın, Ahmet İkiz, Ömer Kürtül, Musa Büyüker, Ömer Yıldırım, Recep Keskin, Ahmet Sökmen, Yaşar Uğur Özasan, Hasan Armut, Ahmet Yıldırım, Ali Özer, Hüseyin Çopur, Mehmet Akif Aksoy, Sadi Bölükbaşı, Mustafa Özsoy

¹⁹ These plots are actually around Aşağıburnaz and among their owners are those who live in the center of Erzin.

8. ELIGIBILITY FRAMEWORK AND ENTITLEMENT MATRIX

The Entitlement Matrix presented in this section provides an overview of all rights within the scope of RAP. The project will try to minimize reluctant resettlement and improve or at least restore livelihoods and living standards of displaced persons. Access roads from the project components are not within the scope of RAP since the locations of construction sites and storage areas have not been determined yet. These components should be planned in accordance with the principles and strategies presented here with an addendum to RAP.

8.1. Eligibility Framework

Compensation for parties affected by the project will be based on transparent, consistent and fair compensation measures. The rights defined under this RAP will comply with local legislation and ESS5. The entitlement matrix will include the categories and rights in Table 8-1.

Table 8-1 Eligibility categories and principles

Impact Categories	Entitlement principles
Permanent land acquisition	Full replacement cost (market prices + transaction costs). Maximum effort to avoid pre-harvest land acquisition.
Partial loss of land	Full replacement price of the lost land section (market prices + transaction costs). Maximum effort to avoid pre-harvest land acquisition.
Remaining Unviable land	If the land parcel remaining after partial expropriation of a land is not economically usable, this remaining part will also be acquired, and compensation will be paid (at full replacement price) upon the request of the land holder.
Houses	Full compensation based on full replacement price in a similar / comparable area, plus moving allowance and temporary allowance (depending on the situation, 6 months minimum wage equivalent income support benefit package or employment opportunity or other outreach mechanisms provided by the municipality and / or other institutions). Wear rate will not be deducted.
Tenants	Assistance in finding a new housing and moving and transportation allowance. Compensation to ensure that tenants are not harmed in the event of a lease termination early.
Structures on the land (barn, shed, fence, etc.)	Full replacement cost. Depreciation will not be deducted. Moving allowances will be provided.
Agricultural products, trees and other soil-based products	The value of the product (market price) and the amount of investment made for the product (input, labor, age of trees). Each product and / or tree will be evaluated according to their own characteristics (annual or perennial, maturity, average yield of at least 3 years, etc.)
Temporary land acquisition	Market rental price to be paid for the lease term. The land must be returned to the affected persons on condition that it was received. In case of loss of agricultural land and crops during the rental period, the property owner must be compensated for the loss of crops during the rental period. If the land is used for a business and its income is affected during the rental period, compensation is paid to the enterprise for the damage suffered during the rental period. The temporary using period starts with the land entry protocol (See Appendix 10) signed by the landowner. Standing crop is recorded with the product registration report and photographs. When the use of the parcel within the scope of the project has ended, the soil is reinstated and delivered to the landowner. It is recorded with the land exit protocol (See Appendix 11), which includes the signature of the landowner and the construction subcontractor and show the soil is reinstated and delivered properly.

Impact Categories	Entitlement principles
Legal tenants, employees or workers in the land or business	Compensation can be paid for the income they earn from the land, the products, and their investment in the land, ensuring that they are not worse off compared to pre-project conditions. Additional allowance will be paid for employees and workers (depending on the situation, 6-month minimum wage equivalent income support benefit package or employment opportunity or other outreach mechanisms provided by the municipality and / or other institutions).
Informal users of public land	Compensation is paid for the value of the investment in products and land (at full replacement value).
Affected persons who do not have an official deed for public land or third-party private land but are dependent on the land they use their livelihoods.	Assistance is provided in efforts to restore livelihoods and living standards to their pre-displacement.
Affected businesses	The cost of full replacement of the affected workplace. Providing temporary assistance for the establishment of the business in a new place and, if necessary (depending on the situation and time lost), compensating the lost income.
Employees of affected businesses	In cases where operation needs to stop, compensation for the loss of monthly salaries, or if employment contract is terminated additional measures such as severance pay and other supportive allowances will be covered to avoid livelihood impacts. Maximum effort to relocate without having to stop operation will be made.
Vulnerable Groups	Efforts will be made to bring livelihoods and living standards to levels prior to displacement. Additional support will be provided, such as priority in employment or mobility aid.

8.2. Entitlement Matrix

There are different types of rights holders who are affected by land acquisition in different ways. The entitlement matrix offers compensation measures in the following impacts:

- Loss of houses (physical displacement)
- Loss of non-residential immovable structures
- Loss of non-residential immovable workplace structures due to land acquisition
- Active person deed land loss
- Passive private land loss
- Crop, trees, water wells etc. losses
- Loss of livelihoods
- Loss of businesses
- Loss of land and / or access to land, resettlement of settlements and other income-related structures, making land unavailable due to expropriation etc. temporary or permanent loss of income for reasons.
- Lands divided into multiple sections due to land acquisition and result in unviable parts
- Loss of common property areas (forests and pastures)
- Impacts on publicly owned services and assets
- Undefined impacts

The groups that are eligible for compensation and measures on these issues are as follows:

- Persons who are permanent users and legal owners of the dwelling
- Permanent user and unregistered property of a dwelling on a land that he has no right to have.

- Official users / tenants who do not own the home
- Landowners of the buildings permanently or periodically
- The user of the building on a land on which he does not have any right, and his title deed
- Official users / tenants of the non-residential building
- Owners of businesses
- Commercial Tenants (Other owners of businesses)
- Employees of impacted businesses
- Non-user landowners
- Landowners who are users of land
- Owners / non-shareholders
- Official users of public lands and other legal entities (paying rent, renters)
- Unofficial users of public lands and other legal lands
- Users of non-cadastral areas

Other groups under the influence of land acquisition, such as seasonal workers, vulnerable groups, those under cumulative impact, users of forests and pastures that are publicly owned, will be considered within the framework of additional support recommendations.

According to some provisions of the National law;

- No land can be used until compensation payments are made,
- In case of a dispute about the right to property, compensation payments are deposited in a national bank account or escrow account belonging to the person who proves his ownership in three-month periods,
- If the compensation payment is postponed for any reason, interest from the market interest rate will be applied to the compensation amount,
- Property rights based on customs or traditions are also granted,
- Costs arising from legal procedures will be borne by GDÖİ, not by the affected people.

Table 8-2 Entitlement Matrix

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
1	Loss of housing (physical displacement)	0	Persons who are permanent users and legal owners of the dwelling	- Cash compensation for full replacement value (payment of expropriation compensation to the beneficiary, including incomplete production and depreciation costs). - Before the building collapses, households have the right to use all recovered materials, including, but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their homes. - Transport expenses are covered, or transportation support is given. - Transaction costs and legal fees associated with the land acquisition process will be paid to the right holder. - Material support can be provided to build the house in another close area that is not affected by the Project within the scope of negotiations with the landowner.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided by the the available sources and budget of GDoll). During the expropriation process, GDoll Expropriation Department will negotiate with landowners/users, evaluate the preferences of the households for resettlement, and apply the most appropriate choice to restore the living conditions of the household to better or at least restore the living conditions. GDoll will be in close coordination and cooperation with MoEU to follow the resettlement process to ensure that PAPs are provided with accommodation options and livelihood support before the civil works of the Project commence. In addition, within the scope of the Social Assistance and Solidarity Encouragement Law No. 3294, GDoll will be the intermediary in providing in-kind and cash support to the household.
2		0	Persons who are formal permanent users	- Before the building collapses, households have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their homes. - Material support can be provided to build the house in another close area that is not affected by the Project within the scope of negotiations with the landowner.	During the expropriation process, GDoll Expropriation Department will negotiate with landowners/users, evaluate the preferences of the households for resettlement, and apply the most appropriate choice to restore the living conditions of the household to better or at least restore the living conditions. In addition, within the scope of the Social Assistance and Solidarity Encouragement Law No. 3294, GDoll

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				- Transport expenses are covered, or transportation support is given. - Users will be informed five months before construction to ensure they can find another accommodation. Besides, assistance to find a proper accommodation will be provided by GDoll. - Transaction costs and legal fees associated with the land acquisition process will be paid to the right holder.	will be the intermediary in providing in-kind and cash support to the household.
3		1 dwelling	Permanent user of a dwelling on the land without legal title deed	- Cash compensation for the full replacement cost (including expropriation compensation, unfinished production and depreciation costs) is paid to the beneficiary. - Before the building collapses, households have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their homes. - Material support can be provided to build the house in another close area that is not affected by the Project within the scope of negotiations with the landowner. - Rental assistance will be provided to the permanent user of the household over 1 year. - Transport expenses are covered, or transportation support is given. - Agricultural engineer support can be provided for the establishment of a vegetable garden elsewhere, as the vegetable garden will also be lost together with residential house. - Users will be informed five months before construction to ensure they can find another accommodation.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided by the the available sources and budget of GDoll). During the expropriation process, GDoll Expropriation Department will negotiate with landowners/users, evaluate the preferences of the households for resettlement, and apply the most appropriate choice to restore the living conditions of the household to better or at least restore the living conditions. GDoll will support from its current budget to relocate and reconstruct the livelihood related buildings to another place in the village such as vegetable garden, barn and coop, as they will also be lost together with the residential house, if requested by the household during negotiations. In addition, within the scope of the Social Assistance and Solidarity Encouragement Law No. 3294, GDoll will be the intermediary in providing in-kind and cash

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				Besides, assistance to find a proper accommodation will be provided by GDoll. - Transaction costs and legal fees associated with the land acquisition process will be paid to the right holder. - A member of household could be employed in the Project.	support to the household, if requested by the household during negotiations. GDoll will be in close coordination and cooperation with MoEU to follow the resettlement process to ensure that PAPs are provided with accommodation options and livelihood support before the civil works of the Project commence.
4	Loss of other immovable/buildings related with livelihood activities	0	Formal owners of structures used permanently or periodically	- Payment at replacement cost (payment of the expropriation compensation to the beneficiary, including incomplete production and depreciation costs) - Households have the right to use all of the recovered materials. - Supports such as transportation and labor will be provided for the relocation of structures such as barns, haystacks, coops to another place requested by the users.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided by the the available sources and budget of GDoll). During the expropriation process, the usage conditions of these structures will be consulted with the users, and the most suitable moving options will be determined.
5		1 barn 1 shed 4-5 unused small highland huts Water wells 1 Solar energy	The owner of the structure on a land on which s/he has no rights and no title deed	- Payment at replacement cost (payment of the expropriation compensation to the beneficiary, including incomplete production and depreciation costs) - Before the building collapses, owners have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their homes. - Supports such as transportation and labor costs for the relocation of assets will be provided.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided by the the available sources and budget of GDoll). During the expropriation process, the usage conditions of these structures will be consulted with the users, and the most suitable moving options will be determined.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
6	Loss of business and Loss of non-residential immovable workplace structures	1 facility and 1 administrative building used by Süper Enerji	Owner of the structures (Toros Tarım Inc. Co. / Torosport Ceyhan Port)	- Cash compensation at full replacement cost (including expropriation compensation, unfinished production and depreciation costs) is paid. - Before the building collapses, owners have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their structures. - The delivery of the materials to the user (Super Energy) is under the initiative of Toros Tarım. In such a situation, the transport of materials will be supported.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided by the the available sources and budget of GDoll) During the expropriation process, the usage conditions of these structures will be consulted with the users, and the most suitable moving options will be determined.
7		1 logistic parking area 1 private parking space in front of the factory	Toros Agricultural Inc. Co. Kron Inc. Co.	- Support in finding alternative land for parking areas will be provided. - Transportation, modification, repair, installation, road correction etc. costs that will occur due to the transfer of parking areas to another location will be compensated. - Material support can be provided to build the house in another close area that is not affected by the Project within the scope of negotiations with the landowner.	GDoll will be in cooperation with institutions such as the District Government, Municipality, Ministry of Finance (for Treasury land) and TOKI in finding alternative lands and building new structures that may be required.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
8		Super Enerji Inc. Co.	User of the structures, loss of business	- Support in finding alternative lands will be provided. - In order to establish the business in a new place without stopping operation / activity, it will be ensured that the new location is found and made ready before the project construction begins. Any income loss will be compensated if the new facility was not put into operation before the construction of the project or if there was a business interruption/ work stoppage during the relocation. - Loss of income due to relocation of tenant will be compensated for the duration of relocation (disassembly, transportation and assembly) for Toros Tarım will be covered (about 3 to 5 months). - Amendments, repairs, paint etc. expenses to be made for the location to be ready for operation will be met in a way not to be lower quality than the old facility. Transportation costs of the machinery, equipment, goods at the facility will be paid. - If there is any material that cannot be reused when disassembled, it will be compensated. - Support will be provided on legal consultancy (lawyer) costs and new expenses for necessary permits, EIA documents, etc. - If the business's departure from the port creates new costs in logistics, these costs will be covered, and the business will be ensured to work with full capacity.	Possible replacement cost will be considered (See Appendix 9). GDoll has this kind of experiences in previous projects (See Appendix 12). Through its available resources and budget, AYGM is committed to compensating the losses of businesses without any grievances due to physical resettlement, as specified in the RAP, in order to achieve the objectives, set out in ESS5. As a public institution, AYGM will provide additional support by using all facilities of public institutions. GDoll will cooperate with institutions such as the District Government, Municipality, Ministry of Finance (for Treasury lands) and TOKI in finding and building a new place for the establishment.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
9		30 people (Super Energy)	Employees of the workplace	- All actions to be planned in a manner that allows business to stay in operation. - In cases where operation is to be stopped even temporarily, GDoll will be a party to protect the rights of the employees and will compensate for the income losses of the employees. This compensation may include the salaries of workers and the payment of insurance premiums during the period of work / activity. - In cases of retrenchment due to relocation of businesses, additional supports will be provided find jobs for workers whose contracts have been terminated. For this, cooperation will be made with organizations such as TAYSEB management and the Chamber of Industry.	Possible replacement costs should be considered (See Appendix 9). GDoll has this kind of experiences in previous projects (See Appendix 12). Through its available resources and budget, AYGM is committed to compensating the losses of businesses without any grievances due to physical resettlement, as specified in the RAP, in order to achieve the objectives, set out in ESS5. As a public institution, AYGM will provide additional support by using all facilities of public institutions.
10	Loss of agricultural lands / Loss of land-based livelihoods / Lands that are divided into more than one part due to land	80 parcels	Non-user owners / shareholders	- Cash compensation (including incomplete production and depreciation costs) at full replacement cost is paid to the right owners. - If the remaining part of the land is "unviable" after partial permanent expropriation, the remaining parts will be expropriated under law.²⁰	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided from the available sources and budget of GDoll).
11		45 parcel	Owners / shareholders who are users of the land	Cash compensation (including incomplete production and depreciation costs) at full replacement cost is paid to the right owners.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided from the available sources and budget of GDoll).

²⁰ If the remaining part of the expropriated property is not suitable for cultivation/benefit, expropriation of the remaining property must be made within thirty days after the submission of a written notice without the need to file a lawsuit in the administrative court (Expropriation Law Article 12, pr.7).

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
	acquisition have unviable parts			- If the remaining part of the land is "unviable" after partial permanent expropriation, the remaining parts will be expropriated under law. - Compensation is paid to the user after valuation of the products and trees on the land by the Commission. - Livelihood support projects will be developed and implemented in cooperation with relevant institutions for farmers whose livelihoods depend on agriculture and have lost their land. - Temporary or permanent employment opportunities especially cleaning, chauffeur, security, cookery etc. during the construction and operation period will be offered to PAPs.	In case the remaining lands are "unviable", AYGM will ensure that the necessary actions are taken under the Expropriation Law, in consultation with the landowners, without waiting for the application of the affected persons. In the case of households whose livelihoods are dependent on agriculture and have lost their land, GDoll will develop projects jointly with the Provincial / District Directorate of Agriculture and Forestry and cooperatives in the region and will provide livelihood support for households who have lost their livelihoods. GDoll will also inform the landowner about the necessary procedures for the supports that can be provided under the Resettlement Law and ensure that they receive livelihood support. GDoll will also ensure that, in the case of households who have lost their income sources, these households will receive the necessary support as an intermediary in line with social assistance programs under the Social Assistance and Solidarity Encouragement Law No. 3294. For the provision of temporary or permanent employment opportunities, prioritization of local employment and displaced persons will be stipulated in contracts to be made with the Construction Contractor and GDoll will ensure that these people have been provided with employment opportunities in the Project.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
12		9 parcels	Landowners whose deeds are passive due to ongoing case process	- They have the same rights as the owners of active title parcels. - Payment of replacement costs to an escrow account (including interest paid during the process) Payment made to rightholder after court concludes the case.	Compensation will be paid from Expropriation Budget of GDoll (however, full replacement cost that the legal legislation does not cover will be provided from the available sources and budget of GDoll). There is ongoing lawsuit on parcels for the identification of right holders. According to the law, the parcels are valued and the expropriation fee is deposited in an escrow account on behalf of GDoll and blocked. When the case is concluded with the decision of the judge, this payment is made available to the right holders. There is no loss of income as by law, interest is for the duration of ongoing court case.
13	Losses of crops and trees	80 parcels	Non-user owners of private lands	Values of assets are also added to the expropriation value.	A special commission will determine the market values of these crops or trees. It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners.
14			Users of private lands	- Crop price and net income to be obtained from trees will be paid in cash compensation. - The value of the product (market price) and the investment amount for the product (input, labor, age of trees) are calculated and paid to the user. - Each product and / or tree will be evaluated according to their own characteristics (annual or perennial, maturity, average yield of at least 3 years, etc.)	A special commission will determine the market values of these crops or trees. It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
15			Formal/informal users of public lands and other legal entity lands	- Crop price and net income to be obtained from trees will be paid in cash compensation. - The cost of the trees is paid to the user who owns the trees belonging to public and legal persons. - The value of the product (market price) and the investment amount for the product (input, labor, age of trees) are calculated and paid to the user. - Each product and / or tree will be evaluated according to their own characteristics (annual or perennial, maturity, average yield of at least 3 years, etc.)	A special commission will determine the market values of these crops or trees. It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners.
16		4 NCAs (See Appendix 6)	Users of non-cadastral areas (NCA)	- Crop price and net income to be obtained from trees will be paid in cash compensation. - The cost of the trees is paid to the user who owns the trees belonging to public and legal persons. - The value of the product (market price) and the investment amount for the product (input, labor, age of trees) are calculated and paid to the user. - Each product and / or tree will be evaluated according to their own characteristics (annual or perennial, maturity, average yield of at least 3 years, etc.)	A special commission will determine the market values of these crops or trees. It is important to identify the users who will experience loss of agricultural income due to land acquisition, rather than landowners.
17		Seasonal workers working at 52 parcels(orchards) ²¹	Seasonal workers including Syrians	Livelihood support projects will be developed and implemented in cooperation with relevant institutions for farmers whose livelihoods depend on agriculture and have lost their land.	In the case of households whose livelihoods are dependent on agriculture and have lost their land, GDoll will develop projects jointly with the Provincial / District Directorate of Agriculture and Forestry and cooperatives in the region and will provide livelihood support for households who have lost their livelihoods.

²¹ Fruit trees were identified in 43 private and 9 public lands. In some of these parcels, only a few trees are affected by the land acquisition.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
					Seasonal Agricultural Workers Solidarity Association, Erzin Chamber of Agriculture and Erzin Agriculture and Forestry district directorate will be stakeholders that will be collaborated to develop a project that will meet the needs of seasonal agricultural workers.
18	Loss of common property areas / Loss of access to pasturelands	In Yukarıburnaz village 113 households	Users of pasturelands	- Technical and feasible measures will be explored in order to provide access to pasture areas, and proper passages will be provided to restore access after construction. - If access to the pasture lands cannot be provided during the construction period, land users whose livelihood is highly dependent on livestock and pasture use will be provided with 2 years of feed support. This support can be provided in the form of direct provision and distribution of fodder in cooperation with cooperatives and related institutions. - If the access to pasture areas is provided through passage gaps; there is no need to compensate the herders if the passage to pastures is open and safe for human and animal health. However, if the partial transition is far from traditional use and it poses a danger to human and animal health, the feed support specified in the previous bullet should be provided partially. - Animal losses due to construction activities are compensated.	In case the transition cannot be provided during construction, GDoll will cooperate and develop a project with Provincial / District Directorate of Agriculture and Forestry and agricultural cooperatives and provide feed support to the herders. For the provision of temporary or permanent employment opportunities, prioritization of local employment and displaced persons will be stipulated in contracts to be made with the Construction Contractor and GDoll will ensure that these people have been provided with employment opportunities in the Project. GDoll is willing and experienced in meeting income losses from previous investment projects (see Appendix 12 for example).

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
19	Public use impacts on services and common assets	Pipeline Public water wells and irrigation system Material storage areas Power plant pylon Water tanks	Local people	- The current infrastructure and services will be protected and regulated so as not to bring economic losses to its users. - Any type of impact on other public assets used by locals will be consulted with relevant state authorities (BOTAŞ, DSI, Agricultural Directorates, Ceyhan Municipality) and compensated at full or avoid through project design.	GDoll will make official correspondence with the institutions such as General Directorate of Cultural Heritage, DSI, Ceyhan Municipality, and Hatay Provincial Directorate of Agriculture for the protection of these assets.
20	Cumulative impacts on PAPs	40 parcels	Owners of the parcels whose lands were affected by other previous projects as well as being affected by this Project	- Agricultural projects will be developed and implemented in cooperation with relevant institutions for farmers whose livelihoods depend on agriculture and have lost 20% of their total land holdings. - Temporary or permanent employment opportunities especially cleaning, chauffeur, security, cookery etc. during the construction and operation period will be offered to PAPs. - Special applications will be made for income loss compensation if necessary (see Appendix 12 for sample application).	GDoll will coordinate with other public institutions and non-governmental organizations to support agricultural project development for the Cumulative affected, multiple affected PAPs who loss 20% of their total land holdings. In the case of farmers whose livelihoods depend on agriculture and have lost their land, GDoll will inform the landowner about the necessary procedures for the supports that can be provided under the Resettlement Law and ensure that they receive livelihood support.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
21	Multiple impacts on PAPs	28 parcels	People whose more than one parcel of land affected by the Project.	- Agricultural projects will be developed and implemented in cooperation with relevant institutions for farmers whose livelihoods depend on agriculture and have lost 20% of their total land holdings. - Temporary or permanent employment opportunities especially cleaning, chauffeur, security, cookery etc. during the construction and operation period will be offered to PAPs. - Special applications will be made for income loss compensation if necessary (see Appendix 12 for sample application).	GDoll will coordinate with other public institutions and non-governmental organizations to support agricultural projects for theCumulative affected, multiple affected PAPs who loss 20% of their total land holdings. In the case of farmers whose livelihoods depend on agriculture and have lost their land, GDoll will inform the landowner about the necessary procedures for the supports that can be provided under the Resettlement Law and ensure that they receive livelihood support.
22	Vulnerable groups	2-3	Vulnerable PAPs (elderly, displaced, women headed household etc.)	- Specific Agricultural projects will be developed and implemented in cooperation with relevant institutions for farmers whose livelihoods depend on agriculture and have lost 20% of their total land holdings. - Temporary or permanent employment opportunities especially cleaning, chauffeur, security, cookery etc. during the construction and operation period will be offered to PAPs. - Special applications will be made for income loss compensation if necessary (see Appendix 12 for sample application).	DGoll will identify parcels subject to cumulative impact during the expropriation process and assess the efficiency of the remaining land. If necessary, the entire land will be expropriated at replacement cost in consultation with the landowner.
23	Undefined impacts	NA	New rights holders identified through Monitoring and Evaluation	If an undefined impact is encountered, RAP recommendations will be followed and support strategies will be developed.RAP commitments are subjected to the monitoring and evaluation procedure presented in Chapter 10 and updated according to need.	Such issues will be identified during monitoring and evaluation activities and measures will be developed within the framework of RAP principles.

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
24		NA	New rights holders emerging due to project revisions	- PAPs who are included by revisions will be entitled to compensation and supports within the framework of the principles in this report. - If necessary, additional work is carried out for revisions.	Such issues will be identified during monitoring and evaluation activities and measures will be developed within the framework of RAP principles.
25		NA	Rights holders that will emerge when project access points, ETLs, construction sites and locations of storage areas are determined	Addendum to RAP will be prepared to identify people affected by these project components and identified PAPs will be entitled to compensation and measures in comply with this RAP.	GDoll will prepare Addendum to RAP for Project components that are not covered by this report.

8.3. Additional Support Suggestions

8.3.1. Protective and supportive measures for agricultural activities

The region is very productive for olive and citrus production. A careful approach to agricultural activities in “Yeşilkent” and “Turunçlu”, which took their names from these fertile lands, will be adopted. This approach may take the form of taking part in activities that support agricultural activities. The additional measures to be implemented are detailed in this section.

- Local experts in local institutions and organizations will be consulted with about the fertile fruit gardens of the Erzin-Dörtüol Plain (Yeşilkent) under protection.
- Owners and / or users of the affected lands will be given the opportunity to harvest their crops before construction.

Access to agricultural lands or pastures can be interrupted in two ways due to the project activities; (1) temporarily due to construction works; (2) permanently due to the railway line. Both the division of lands and the closure of existing roads can reduce land dependency and increase costs on income generating activities. To prevent the socio-economic negative impacts of these problems, the proper crossings will be established on the line route if possible and traditional uses will be taken into account when determining the location of crossing points. Practices that may prevent farmers’ agricultural activity will be avoided sensitively. Supporting agricultural activities also depends on the protection of irrigation systems. It is known that there are irrigation systems in the project area previously built by DSI. As stated in the ESIA document, citrus production in the region is made with a drip irrigation system of 99%. It has been observed that stakeholders have concerns about possible damages to irrigation canals built by DSI. A hitch in irrigation canals can affect a wider area than affected parcels. Therefore, during the design phase, GDoll acted responsibly and determined a route that will not damage the irrigation systems.

Supporting agricultural activities and protecting agricultural infrastructure will prevent the reduction of income sources of seasonal agricultural workers, including Syrians, as well as farmers.

Seasonal agricultural workers, including Syrians will be indirectly affected by land acquisition. To reduce this impact, the following measures will be implemented:

- Construction activities will wait for the completion of harvest season as confirmed by GDoll
- Seasonal Agricultural Workers Solidarity Association will be consulted regularly as a stakeholder of the project and additional measures will be implemented as necessary and if requested by them

8.3.2. Minimizing the impacts on Yukariburnaz village

Many households in Yukariburnaz village, are engaged in animal husbandry which is an important source of livelihood. Two railway lines that will be constructed is anticipated to have impacts on both the daily lives of these PAPs and create livelihood impacts as the routes limit and prevent the access to pasture lands. These impacts have also been discussed under the project ESIA document. Through interviews and meetings held with the villagers concerns and possible options of how to overcome the impact was discussed. Some mitigation measures have been proposed with the guidance and suggestions of PAPs.

It is highly likely that the project will result in limiting the access to agricultural and pasture lands and to change the traditional use patterns of the community also impacting the daily operation of animal husbandry activities. Therefore, developing livelihood restoration projects with relevant institutions such as fodder support and agricultural supports is very critical especially for the Yukarıburnaz village. Additionally, employment opportunities under the project will prioritize these PAPs of working age living in Yukarıburnaz village.

8.3.3. Additional Measures for Vulnerable Groups

Vulnerable people who will be subject to physical and economic displacement will be supported in terms of their special needs. For example, it may not be enough to inform the vulnerable people about land acquisition by notification. Vulnerable people who cannot leave their homes because of their disabilities and illnesses will not incur additional costs on proxy and bank transactions.

There are also other people who may be more affected by economic and physical displacement. EM adopts various principles for these PAPs who are determined within the scope of RAP. The groups of PAPs listed below will be verified again during expropriation process and receive additional support in line with the EM if necessary.

- PAPs that have encountered cumulative impacts; whose land has been already affected by other infrastructure or investment projects (highway, railway, oil or natural gas pipelines etc.) in the region and whose lands will be affected within the scope of this Project.
- PAPs whose multiple lands are affected by the land acquisition requirements of all Project components.
- PAPs losing more than 20% of the total land assets that generate agricultural income due to land acquisition of the Project.
- PAPs left with unviable land due to the Project.

9. RAP BUDGET

The census survey and inventory studies for the Project' affected assets have been conducted. Though the assets survey all affected parcels, landowners and other assets on lands were identified with current Project design. This asset inventory study carried out by the Expropriation Department provides data about the affected lands but missing information on some parcels such as the exact number of trees, types of trees, crops planted on lands etc. Inventory of project-affected assets is included in Appendix-4. As the construction phase was anticipated by GDoll to commence in the second half of 2021, it is envisaged that the expropriation process will commence in the second quarter of 2021 and the identified assets will be verified formally. Although the formal valuations will be made during expropriation process, costs for the affected lands and other immovable and compensation for losses have been forecasted.

Table 9-1 Estimated RAP Budget

Budget Items	Estimated Costs
Consultancy costs for the preparation of RAP	30,000 \$
Expropriation payments of affected lands and assets	5,293,000 \$ ²²
Payments for standing crops and trees	3,528,000 \$ ²³
Personnel employment costs for the implementation of RAP (<i>Social Specialist at PIU and Community Liaison Officer at site</i>)	245,000 \$
Consultancy costs for land determination services during expropriation process	49,500 \$
Consultancy costs for external monitoring services	80,000 \$
Costs of the entitlements to be made from the current budget and sources of DGoll	480,000 \$ ²⁴
Administrative expenses (publication, transportation, etc.)	5,000 \$
Contingency (%3)	291,315 \$
TOTAL	10,001,815 \$

For the official valuation of assets, the methodology for valuation of assets to be followed by GDoll is presented in Section 4.4. The relevant World Bank requirements and the gaps that need to be addressed within the scope of RAP are included in Section 3.3. The groups eligible for the entitlements are defined in Entitlement Matrix in Section 8.2. Valuation process will be based on the full replacement price compatible with the market prices. There are a number of other points to consider during official valuation:

- Railway construction projects have a value-reducing impact for the lands. Therefore, the decrease in value on the remaining parcels is taken into account during the land valuation process.
- The remaining unviable parts of the parcels affected by land acquisition have been evaluated within the scope of this RAP. The principles to be used in the expropriation of these areas should be determined in consultation with the right holders.
- It should be borne in mind that the Erzin-Dörtüol Plain (Yeşilkent) contains fruitful orchards under protection. In accordance with the principle of compensation in the replacement cost of the World Bank, expropriation costs that are not below the market purchase and sale records should be calculated.

²² The budget is calculated without deducting amortization costs of the land and assets (at replacement cost).

²³ The budget is calculated at replacement cost.

²⁴ Including the estimated costs of livelihood restoration projects as defined in Entitlement Matrix.

- It is recommended to request local experts and to be consulted with institutions and organizations in the land valuation process of the orchards in the Protected Plain.

	Environmental and Social Impact Assessment RESETTLEMENT ACTION PLAN	
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 106 / 123	

10. MONITORING AND EVALUATION

In this section, roles and responsibilities for the monitoring and evaluation process, reporting frequency, internal and external monitoring content and indicators, as well as the integration of feedback from external monitoring into the Project implementation process are defined.

The purpose of monitoring and evaluation (M&E) is to provide feedback on Project management regarding RAP during the construction and operation of the Project and to prevent livelihood losses of PAPs that may arise from the Project by making necessary arrangements. Monitoring and evaluation is necessary for the measures developed to compensate the negative impacts caused by land acquisition and for the RAP implementation process to proceed in a healthy manner. In addition, the effectiveness of the grievance mechanism, one of the most important tools of stakeholder engagement, will be monitored for a successful RAP implementation. The main purpose of RAP monitoring will be to verify the following questions:

- Are the compensations and measures provided in the RAP implemented properly and timely?
- Can the eligible groups receive their full compensation entitlements within the agreed period?
- Can the compensation and measures offered in RAP be effective in maintaining or increasing the living standards of PAPs?
- Are the complaints made by PAPs managed and resolved in accordance with the RAP and SEP?
- Are measures related to stakeholder engagement and resettlement taken to include vulnerable groups?
- Are there undefined impacts or eligible groups? (person or groups who may experience physical and economic losses)
- Are the measures identified in the ESIA report and other social and environmental management plans implemented to support mitigation of resettlement impacts?

To this end, a mutually complementary monitoring mechanism, consisting of internal, external monitoring and completion audit, has been established as follows;

Internal monitoring: M&E activities, which are carried out with the reporting made within the institution, in which the answers to the above questions are sought.

External monitoring: M&E activity supported by the consultancy from an independent party and seeking answers to the above questions. Internal monitoring reports are reviewed, and field visits are carried out.

Completion audit: Ending both internal and external monitoring processes of the project, RAP completion audit will provide a final indication that the restoration of livelihoods is sustainable and no other intervention is required. The internal and external monitoring process will end with RAP Completion Audit to be conducted by External Monitoring Consultant. Internal and external monitoring reports are reviewed in the completion audit and field visits are carried out.

The basic principle of the whole monitoring process is to conduct each monitoring activity in a participatory manner using appropriate techniques. These techniques are, for example, in-depth interviews with PAPs or community leaders, focus group discussions with vulnerable

	Environmental and Social Impact Assessment RESETTLEMENT ACTION PLAN	 Altyapı Yatırımları Genel Müdürlüğü
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 107 / 123	

groups or communities, and related mitigation actions at the community level, in addition to monitoring and visiting affected lands with PAPs.

Roles and responsibilities of the units to be authorized in the monitoring and evaluation process are defined in Table 10-1.

Table 10-1 Roles of RAP Implementation units and staff in the M&E process

Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators
GDoll (Headquarters)	PIU	Internal Monitoring	✓ Preparation of M&E reports and submission to Project management and lenders ✓ To follow the land acquisition process in order to compensate the losses of all PAPs ✓ To ensure that all landowners' (formal and informal) livelihoods are compensated timely and appropriately through the RAP Fund ✓ To ensure that all PAPs, especially vulnerable ones, can easily express their concerns that may arise in the RAP implementation process and respond to them in time. ✓ To monitor the engagement activities regarding land acquisition to be carried out with relevant stakeholders in accordance with the SEP ✓ To ensure that the grievance mechanism is transparent and accessible to all PAPs ✓ To closely monitor the compliance of all planned RAP applications with the program and the budget. ✓ To plan in detail the subsequent measures to be taken in consultation with the relevant parties of the RAP Implementation.	Quarterly	➤ Number of economically displaced households and individuals by project component and / or land acquisition type, ➤ The number of public information and consultations needed during the RAP implementation on land acquisition and restoration of livelihoods, ➤ Number of compensation payments completed, ➤ Amount and percentage of payments made as a result of court proceedings and payments made as a result of negotiations, ➤ Number of ongoing / open court cases among total court cases ➤ Number and type of complaints about land acquisition and compensation process, ➤ Status of complaints (open, closed), closing time and resolution status, ➤ Number of PAPs received any compensation payments and / or subsistence from current budget and sources of GDoll, ➤ Number of stakeholders contacted during the RAP Implementation (types of stakeholders, issues raised / discussed and gender distribution of participation) and feedback from Consultations, ➤ Number and type of support provided to vulnerable groups among PAPs

Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators
		External Monitoring	✓ Providing the internal monitoring data and all other necessary documents to the external monitoring Consultant ✓ Organizing M&E studies, reviewing reports and submitting them to Project management and lenders. ✓ Taking action in practice when necessary, giving information about corrections.	Semi-annually	-
		Completion Audit	✓ Providing the internal monitoring data and all other necessary documents to the external monitoring Consultant ✓ Organizing M&E studies, reviewing reports and submitting them to Project management and lenders. ✓ Taking action in practice when necessary, giving information about corrections.	At the end of the Project	-
Independent Party	Resettlement Specialists	External Monitoring	✓ Perform monitoring activities to verify compliance with RAP commitments and identify problem areas in RAP implementation ✓ Preparation of external monitoring reports by reviewing internal monitoring records and reports and using both desktop data and field observations ✓ To provide advice to GDII on corrective actions and measures to be taken to improve RAP implementation	Semi-annually	➤ Number of information and consultation activities performed related to the resettlement process ➤ Number of consultations with vulnerable groups ➤ Number of households physically displaced, ➤ Number of PAPs receiving transitional livelihood support or other compensation ➤ Number of PAP / households receiving additional support ➤ The number of compensation agreements awarded and reconciled ➤ Number of ongoing lawsuits for which no consensus can be reached ➤ Percentage of complaints resolved in a timely manner

Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators
		Completion Audit	✓ Upon the completion of resettlement activities, performing a RAP Completion Audit, preparing the audit report and submitting it to the Project management.	At the end of the Project	➤ Number of complaints that cannot be resolved / closed on time ➤ Qualitative feedback from PAPs on RAP implementation ➤ The ability of households to return to pre-displacement living standards and income sources ➤ How the compensation / crop payments received are evaluated by the households ➤ Whether payments are made at full replacement price ➤ Satisfaction status of the households regarding the physical displacement
GDoll (Project site)	Community Relations Officer	Internal Monitoring	✓ Preparing monthly reports to the PIU about the compliance of RAP implementation activities with the plan ✓ Providing necessary data about the internal monitoring to the PIU ✓ Following the activities of Construction Contractor to be in line with the RAP and other relevant plans of the Project ✓ Taking actions in the implementation when necessary, informing the PIU about the corrections	Quarterly	Records, signed petitions, official documents, photographs, materials, complaint registration and closure forms available on the following topics: ➤ Compensation, support and measures provided within the RAP ➤ Developments related to the necessary payment and support process of eligible PAPs ➤ Impact indicators of compensation, support and measures offered in RAP to protect or increase the living standards of PAPs ➤ Complaints raised by PAPs and solutions developed ➤ Stakeholder engagement practices ➤ Implementation of mitigation measures identified in the ESIA report and other social-environmental management plans
		External Monitoring	✓ Providing the necessary data for external monitoring to the central unit. ✓ Taking actions in the implementation when necessary, informing the PIU about the corrections	Semi-annually	

	Environmental and Social Impact Assessment RESETTLEMENT ACTION PLAN	 Altyapı Yatırımları Genel Müdürlüğü
REPORT NO: CNR-ADN-RAP-001 Rev-00	Page 111 / 123	

11. PUBLIC PARTICIPATION AND DISCLOSURE OF DOCUMENTS

The Stakeholder Engagement Plan (SEP) of the Project is already in place and the consultation activities to be carried out within the scope of this RAP will also be in line with the SEP. Active communication has been established with the stakeholders determined in the SEP during the project preparation period, and will be in the future as well. The methods and materials defined in the SEP (consultation meetings with local communities, focus group discussions, presentations, local media announcements, brochures, grievance mechanism, phone line, etc.) will be used throughout all phases of the Project.

As stakeholder engagement is a continuous process that needs to be taken into account throughout the project life cycle, this section describes stakeholder engagement activities performed during the RAP preparation process and activities that will be performed during RAP implementation.

11.1. Consultation Activities Performed under RAP Preparation

GDOII has consulted and made project revisions to minimize resettlement during the project design phase. Land measurements were made by experts. GDOII staff provided the infrastructure for consultations that proceeded through the informal asset inventory by visiting the entire line.

Within the scope of the ESIA, social and environmental measurements and evaluations were made in the project area. These studies are based on the following consultations with people affected by the project, local institutions and organizations;

- Official correspondence and requests for information,
- Survey work in nearby settlements,
- Focus group meetings,
- Settlement interviews with mukhtars,
- In-depth interviews with local institution and organization officials,
- In-depth interviews were conducted with the influenced workplace and industrial area officials.

Physical and economic resettlement issues were analyzed within the scope of RAP. This analysis is based on consultations with individuals affected by land acquisition, local institutions and organizations. In this context;

- Official correspondence and requests for information,
- A survey study with the owners, users and beneficiaries of the lands to be purchased,
- Interviews with those affected by physical resettlement,
- In-depth interviews were made with local institution and organization officials.

Stakeholders communicated during the RAP studies are:

- Mukhtars of affected settlements (Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımazı, Turunçlu, Yeşiltepe, Büyüktüysüz) around the Project area (January 2020, February 2020).
- Community members of Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımazı, Turunçlu, Yeşiltepe and Büyüktüysüz villages (January 2020).
- Facility Manager of Super Energy Coal Storage Facility (January 2020, February 2020, April 2020).
- Owner of Super Energy Coal Storage Facility (April 2020).
- Toros Agriculture Industry and Trade Process and Planning Manager, Operating Manager, Marketing Manager (January 2020).

- Institution authorities of Erzin Chamber of Industry and Trade (January 2020).
- Head of the Chamber of Erzin Chamber of Agriculture (January 2020, February 2020).
- Deputy Manager of Erzin Yeşilkent Irrigation Cooperative (January 2020).
- Engineer and Technician Personnel of Osmaniye OIZ (January 2020).
- Deputy Manager of the Institution and engineers of Erzin District Directorates of Agriculture and Forestry (January 2020).
- Entitled households/persons which will be affected by land acquisition in Yeşilkent (Erzin district centre), Sarımazı, Turunçlu, Aşağıburnaz and Yukarıburnaz (February 2020).
- Entitled households/persons affected by Erzin Port station revision (March 2020).

11.2. Further Consultation Activities under RAP Implementation

After the official asset inventory study is completed, informative meetings will be held in all the settlements affected by the Project with the participation of DGoll PIU, Expropriation Department and other relevant officials. Announcements will be made in advance to ensure high participation of landowners and users to the meetings. Informative material such as brochures and posters prepared will be distributed to PAPs in these meetings and they will be informed in detail about the entitlements and land expropriation process of the Project. Guide to Land Acquisition and Compensation (GLAC) will be prepared to include detailed information about entitlements, eligibility criterias, valuation procedures and GRM and distributed to PAPs during the engagement activities. Frequently asked questions and answers will also be presented in this guide to ensure all PAPs have necessary information about their entitlements.

Consultations to ensure public participation during RAP implementation are as follows:

- Negotiations with RAP implementation with affected people, households and communities. Informing people living in settlements that are under direct and indirect socio-economic impacts, affected by land acquisition and vulnerable groups about the grievance mechanism.
- Disclosure of RAP to the public.
- Informing the right holders determined in RAP about the implementation stages.
- Consultation with the owners of the buildings and workplaces to be resettled.
- To record the complaints regarding the implementation of the rights holdings presented in RAP and to resolve them by managing them.

Institutional consultations on all phases of the project will also be carried out. These;

- Taking the expropriation decision and choosing the expropriation method
- Getting opinions from institutions and organizations
 - DSI regarding irrigation systems and water resources,
 - Hatay Agriculture and Forestry Provincial Directorate with regard to the protected lowland status,
 - BOTAŞ regarding pipelines,
 - Ceyhan Municipality and
 - Consultations with other local institutions and organizations.

11.3. Document Management and Disclosure to PAPs

GDoll PIU is responsible for implementing a document management system to manage all documentation related to land acquisition, consultations with stakeholders, asset inventory, surveys, payments, compensation contracts and other legal documents regarding RAP.

This RAP has been announced in consultation with the public, in accordance with WB ESS5. Feedback received during this consultation has been integrated into RAP and submitted to the World Bank's final approval. After the approval of the World Bank, GDoll will publish both Turkish and English versions of the document on its official website, as well as sharing RAP with the relevant Ministries, Local Authorities and Institutions. The final RAP will also be announced on the World Bank website with a separate link. The World Bank will approve any addition to the RAP developed in the later stages of the project; this document will be available on both the GDoll and the World Bank website. RAP will also be presented to PAPs, especially vulnerable groups, in public consultation meetings to inform about the project's land-based impacts, legal rights and entitlements, Grievance Mechanism before the land acquisition process begins.

11.4. Feedbacks from Document Disclosure

As the Covid-19 pandemic has coincided with the preparation studies of this RP, GDoll has adopted additional measures during the consultation and disclosure of this document. As a national lock down is currently in place, electronic copies of the document and additional tools such as presentations and informative videos on the environmental and social impacts of the project, including land-based impacts, have been prepared and disseminated via GDoll's official website, other social media channels and via direct messaging on individual basis for the PAPs. Official correspondence and electronic information sharing with stakeholders such as other public institutions have been carried on as usual.

To the extent possible, DGoll will refrain from sending and distributing printed material until the outbreak is over. This consultation/disclosure was carried out as a primary step and are to last until the end of third quarter of 2020. As per the requirements of ESS10 and the consultation requirements of ESS5, GDoll will repeat its consultation process by conducting regular consultation meetings once the lock down is no longer at force and before civil works can start.

Feedback regarding the disclosure of the documents has been collected through official correspondences, online feedback forms, e-mail and through a hotline established for this purpose. As the public disclosure is limited to these channels due to outbreak, additional consultations have been conducted with Mukhtars to ensure all PAPs have been informed about the Project documents and received informing messages from DGoll. The availability and efficiency of adopted ways of disclosure has been consulted with the settlement heads and additional measures were implemented accordingly. For the PAPs who could not access online channels, an informative summary text of disclosed documents has been prepared and shared. Mukhtars were also asked to convey the questions and concerns of PAPs who are not able to access the communication channels, if any.

Feedback received from stakeholders during the disclosure process is presented in the **Table 11-1**, with reference to the relevant sections of RP and ESIA documents. All the issues mentioned are currently covered under this RAP. Although the raised issues are addressed in relevant documents, GDoll will provide feedbacks to PAPs in response to their questions and concerns. It is seen that most of the questions / complaints have been raised about the Project revision made in Erzin Port station. Apart from this topic, RP and ESIA field studies have shown that the public view on the Project is mostly positive.

Table 11-1 Feedbacks of PAPs from Disclosure Activities

Questions/Concerns	Subject	N	Addressed Section
Our house, barn and garden are affected by the Project (Yukarıburnaz). What is the current phase of the Project?	Physical resettlement	1	Physical resettlement are discussed under the title of “Physical resettlement” in the “Potential Impacts of Physical and Economic Displacement” section of RAP.
Will our losses during the moving be covered?	Loss of business	1	Business Loss issues are discussed under the title of “Businesses” in “Potential Impacts of Physical and Economic Displacement” section of RAP and “Impacted Land and Other Assets, Economic and Physical Displacement” section of ESIA.
The only problem is that the railway route divides the main road of our village. So that, interchanges should be constructed. Because there were many accidents in our neighbor village (Yeşiltepe) in the past because of railroad crossing.	Community Health and Safety, Infrastructure Status	1	Under the titles of “Community Health and Safety” and “Infrastructure Status and Social Services” of ESIA.
Tosyalı Port Project is planned at Hatay / Erzin / Aşağıburnaz borders. Then the Railway Project, which will connect to the port area, was started. In the first design of the railway project before the revision, the arable lands were not affected. Later, the project was amended and citrus cultivated lands with high economic value came into impact. This will affect irrigation systems, transportation and harvest activities negatively. However, in the first version of the Project (before revision), unused treasury lands and non-agricultural lands were preferred. It is essential to make the project prior to the revision. As an agricultural engineer living in the region, I think my suggestions will be taken into consideration.	Project route, Land Fragmentation, Economic displacement, Cumulative impacts	11	Revision is seen under the title of “Land Requirements of the Project”.
We do not want this project, which makes us suffer by dividing our agricultural lands in the middle. Alternatively, we want it to pass through the non-agricultural treasury land. We kindly request you to keep the Project design like as before the revision. We do not want the section of Çukurova-İskenderun railway passing through Aşağıburnaz village. We are not against the railway passing through the treasury land without harming our land. Don't prevent our income.			Land divisions are discussed under the title of “Land Fragmentation” in “Potential Impacts of Physical and Economic Displacement” section of RAP and “Impacted Land and Other Assets, Economic and Physical Displacement” section of ESIA.
We don't want this road to pass here (Aşağıburnaz - Erzin port) because we're small farmers.			Cumulative Impacts are discussed under the title of “Cumulative Impacts” in “Potential Impacts of Physical and Economic Displacement” of RAP.
			Alternative assessments for the Project technical design is made in the ESIA Section 6.

Questions/Concerns	Subject	N	Addressed Section
We are not against the railway project of the Ministry of Infrastructure and Transport. But we are against the division of our agricultural lands. It could pass through the vacant lands near our orchards. Since it is our main source of income, we are against dividing the lands.			
The Railway, which is planned to pass through my land in Aşağıburnaz, should be changed as it will divide our land and make our agricultural activities difficult. It would be more proper to pass through the treasury lands.			
Since our livelihood is farming, we do not want our land to be divided. A road has already passed through our lands, and now if the railroad passes, we farmers will be victimized.			
We do not want the Çukurova-İskenderun railway, which is planned to pass through our Aşağıburnaz village, as it will damage our agricultural land.			
The parcels of Aşağıburnaz village affected by the railway route, were divided into two with the highway passing in past. These parcels will be divided again by railway. The division of lands negatively affects our income. We ask the Ministry to design the Project to pass the railroad through the treasury lands. Please do not remove the peasants from agriculture.			
The Project divides our agricultural lands (Aşağıburnaz). If the railway passes 500 meters below (towards Erzin port), no one's land will be divided. My land is divided in the middle. It leaves me 10 meters on one side and 10 meters on the other.			

Source: Document Disclosure Activities, 2020

GDoll have also communicated with all national and local institutional stakeholders during the disclosure process in accordance with the SEP. Opinions were requested from the institutions and organizations with an official correspondence about environmental and social safeguard documents of the Project. Official responses were received from the relevant institutions within the disclosure process. In the letter dated 05.05.2020 of the Hatay Provincial Culture and Tourism Directorate presented a request for information about the process and a suggestion to receive opinion from the Regional Board of Hatay Cultural Heritage Preservation Directorate.

In the letter dated 08.05.2020 received from the Ministry of Agriculture and Forestry, it was stated that their opinions and suggestions will be officially shared once their correspondences with the relevant General Directorates have concluded. Future suggestions will be evaluated by GDoll.

According to the letter dated 05.05.2020 received from Osmaniye Governorship, Provincial Directorate of Agriculture and Forestry, two parcels planned to be used for the Project within the borders of Osmaniye province are arable lands (246/6 and 246/7). It is reminded that the permission of non-agricultural use of these two parcels should be obtained, and that the construction activity should not start before the permit application is made and the permit is obtained. These permissions will be obtained by GDoll during the land acquisition process.

12. GRIEVANCE MECHANISM

12.1. Purpose and Scope

The SEP document prepared for the project identified the stakeholders of the project and regulated the methods and timeframe for consultation with these stakeholders. SEP draws a communication and consultation roadmap to ensure that the Project objectives are achieved and that the Project is carried out in a transparent, inclusive, responsive and collaborative way. SEP also establishes a grievance mechanism for stakeholders.

The grievance mechanism will be established to receive complaints and concerns expressed by PAPs with respect to compensation and resettlement in a timely manner and to convey them to relevant authorities. An application body designed to resolve disputes in an impartial manner is also included in this mechanism. This mechanism will continue to function throughout the resettlement planning and implementation process.

The grievance mechanism will be one of the tools to monitor the implementation of the RAP. The RAP identified the indicators to monitor the effectiveness of the RAP implementation. Data from the grievance mechanism database will be used to monitor Project performance related to the land acquisition of PAPs and the restoration of livelihoods. The Project will take the necessary mitigation measures by analyzing the results of the complaints and comparing them with the objectives defined in RAP.

12.2. Roles and Responsibilities

Recording and monitoring of complaints (including environmental issues) will be the primary responsibilities of GDoll PIU. At the same time, both GDoll and the Contractor's social experts will be on site (as defined in the SEP) and they will also be responsible for the recording and management of complaints. These assigned personnel will follow the Grievance Mechanism to record and resolve all grievances from stakeholders and to monitor the defined mitigation measures. Project contact information will be provided through information meetings, Project brochures and the Project website to increase awareness of PAPs and provide transparency on how they can voice their complaints. Various channels through which stakeholders can officially voice their complaints include:

- ✓ **Phone line:** Stakeholders can call GDoll PIU directly (0312 203 10 00) and speak to a contact person: Güzide SAYIN (or directly call on 0312 203 17 96 or Ali KETENCİOĞLU [or directly call on 0312 203 17 98])
- ✓ **E-mail:** Complaints can be sent via e-mail to guzide.sayin@uab.gov.tr or ali.ketencioglu@uab.gov.tr
- ✓ **Face-to-face:** PAPs can forward their complaints to the relevant staff of GDoll or the Contractor in the site
- ✓ **Grievance Registration Form:** PAPs can fill in grievance registration forms that will be available at the construction site and also other public locations that all stakeholders can access (Appendix 7a)
- ✓ **Online application:** PAPs can fill in a complaint registration form online at <https://aygm.uab.gov.tr/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gelistirme-projesi>

12.3. Principles of Grievance Mechanism

A common and adopted grievance mechanism is of great importance in solving problems. Failure to solve problems in many projects is because the PAPs do not have sufficient information on how to use the grievance mechanism. A common grievance mechanism requires that both affected people and eligible individuals be informed and appropriate tools

that will allow different groups to access the mechanism to be developed. Thus, appropriate tools that make the access of women, young people, elderly, other vulnerable groups and illiterate people to mechanism easier should be developed.

A common and adopted grievance mechanism should also be introduced to Contractor personnel. Contractor personnel should be able to properly direct the individuals who have complaints to use the mechanism and inform the authorities about the complaint.

Receiving the complaint in a timely manner is related to the openness and accessibility of the complaint channels. Complaints should be recorded in the mechanism within 2 days and the solution process should be started. A sample complaint registration form is provided in Appendix-7a.

The grievance mechanism is designed in a way to allow anonymous complaints to be submitted and resolved. Submitting a grievance will not require personal information or physical presence, however the stakeholders can add their personal information if they wish to do so. All stakeholders will be allowed to raise their complaints or concerns anonymously. This gives especially the vulnerable people confidence that they will not be face with any difficulties for raising concerns.

It is the responsibility of PIU and site experts of GDoll to develop solutions and actions to the received complaints. After the necessary investigations are done, if the solution providing is under the responsibility of another unit, the complaint should be sent to the relevant unit within maximum 10 days.

Legal requirements, World Bank standards, mitigation measures in the ESIA and entitlement strategies in the RAP will be used to resolve the complaints. If the resolution of the complaint requires legal responsibilities other than the Project authorities, the complainant is informed about these issues and even supported if possible.

The solution and corrective actions developed should satisfy the Complainant. All parties should be able to reach an agreement on corrective actions during resolving process. In cases where a satisfactory solution cannot be developed, it is necessary to meet with the complainant, apply to the witnesses, and hold consultation meetings involving the complainant and third parties. If the complaint issue is an irreversible loss, compensation should be made, replacing the damaged asset and providing another compensable benefit. However, it should be known by the parties that the complainants who are not satisfied with the solution can go to court.

At the end of the 30-day period for the resolution of the complaint, the decision / result should be presented to the complainant in formal-written ways. The date of this feedback is recorded in the GRM as the closing date of the complaint.

Implementation of the developed solution may take time. The activities implemented in the resolution of the closed complaint should be followed. Complaints should be closed with a separate form and attached to the complaint registration form. Sample complaint closure form is presented in Appendix-7b.

The complainant may request that the issue be transferred to the next level if he or she does not feel that the grievance is being adequately addressed by the PIU and site experts of DGol. A Grievance Redressal Committee (GRC) will be formed that will consist of civic leaders and relevant institutional representatives. The independent experts will be chosen from the local universities, local institutes or local NGOs. The GRC will be called into place when a first-tier resolution is not found.

The complainant is free to ask for DGoll's PIU or CLO at site to convey his/her complaints to the GRC so that any complaints which have already been considered by DGoll or Construction Contractors but could not be resolved can be re-considered by the Committee. PIU will be responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both parties.

The GRC will hold the necessary meetings with the affected party / complainant and attempt to find a solution acceptable at all levels. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained on the closure format as in Annex 5. If the complainant does not accept the solution found by the GRC, he/she has the right to apply to the judiciary and pursue legal proceedings.

13. IMPLEMENTATION OF RAP

The impacts and entitlements identified within the scope of this report will be applied in accordance with the criteria and commitments set out in the implementation of the Project. The activities to be carried out within the scope of RAP implementation are summarized in the table below.

Table 13-1 RAP Implementation Activities

Implementation Issue	Implementation Activities
Public information, consultation and participation	All affected people (communities, landowners, users and beneficiaries) will be provided with timely and relevant information and will be consulted on resettlement options, and opportunities to participate in planning, implementation and monitoring processes. Participation means the import of complaints, demands and information received from public and development of social and environmental principles.
Establishing a grievance mechanism	Appropriate and accessible grievance mechanism will be available in order to receive and resolve grievances of affected people.
Preparation of Contractor contracts	Contracts will be developed in line with the environmental and social standards adopted. Documents such as RAP, Stakeholder Engagement Plan, Workforce Management Plan, Site Management Plan, and Emergency Action Plan will be taken as guide while preparing contracts.
Eligibility and entitlement to compensation and support	Necessary compensation and measures will be applied to the groups in the RAP Entitlement Matrix; not only legal owners, but also traditional landowners without title deeds, formal/informal users, beneficiaries of forest and pasturelands.
Environmental and social mitigation measures	Mitigation measures determined within the scope of the ESIA and RAP will be planned and implemented.
Evaluation of replacement value / cost for immovable properties	Compensation will be calculated from the full replacement cost. The valuation should be carried out properly ensuring that the affected person obtains equivalent substitution assets. Depreciation will not be deducted from the calculation.
Transportation aid and support	All affected people will be provided with measures and development support during resettlement.
Obtaining of land rights	Land rights will be taken over by making compensation payments and allocation transactions.
Monitoring and evaluation	Monitoring arrangements will be made during the expropriation / resettlement implementation, including livelihood restoration / community development programs.
Operation of the grievance mechanism	Complaints of affected people will be taken and resolved within the framework of the principles in Section 12.

13.1. Roles and Responsibilities

GDoll Expropriation Department will be the main authority in the preparation of the expropriation plans and the realization of the expropriation process, but it is not responsible for the implementation of the RAP. PIU, established within GDoll, will be the primary responsible for RAP implementation. PIU will include experts who are experienced and competent in the implementation of RAP. GDoll PIU will work in close cooperation with the Expropriation Department and will follow the land acquisition activities in order to ensure that land acquisition activities are carried out in accordance with relevant national laws and international policies. Table 13-2, shows the distribution of roles and responsibilities for RAP implementation.

Table 13-2 Roles and Responsibilities in RAP Implementation

Unit	Responsibility
Expropriation Department of GDoll	✓ Communicates with land owners / users to inform them about their rights and land acquisition process ✓ Identifies formal / informal land users and assets and vulnerable groups on the affected lands, establishes a commission for value determination ✓ Manages and executes all transactions related to land acquisition in accordance with Turkish legislation. ✓ Provides regular land acquisition process information to GDoll PIU, including complaints and meeting records in negotiation meetings ✓ Carries out the organizational and institutional consultations required for the fulfillment of the RAP commitments.
GDoll PIU (Headquarters)	✓ Works in close cooperation with the Expropriation Department to ensure that the land acquisition process complies with the World Bank Environmental and Social Standards, ensures that value calculations are made to meet international standards. ✓ Implements and develops processes related to the Grievance mechanism, management of entitlement supports/compensations and stakeholder engagement. ✓ Leads, follows and monitors the site personnel for the proper execution of processes related to the Grievance mechanism, management of entitlement supports/compensations and stakeholder engagement. ✓ Coordinates with the parties for the proper implementation of processes related to the Grievance mechanism, management of entitlement supports/compensations and stakeholder engagement. ✓ Tracks and reports information activities conducted within the scope of RAP entitlement applications / complaints / requests ✓ Monitors and reports the progress made regarding the commitments defined in the RAP ✓ Determines whether other actions are necessary to achieve RAP implementation objectives ✓ Examines whether the RAP entitlement applications are eligible ✓ Verifies that measures for the restoration of livelihoods are implemented and evaluates their effectiveness ✓ Prepare brochures and other informative materials related to land acquisition in line with SEP

GDoll Community Relations Officer (Site)	✓ Provides regular information to PAPs about the grievance mechanism, construction phases and schedule, community safety, management of entitlement supports/compensations and entitlements ✓ Implements processes related to the Grievance mechanism, compensation implementations and stakeholder engagement. ✓ Receives the RAP entitlement applications / complaints / requests of the PAPs and directs them to the PIU at Headquarters and ensures that the necessary actions are taken. ✓ Distributes leaflets and other informative materials related to land acquisition and conducts other engagement activities defined in SEP
Independent Consultants	✓ Monitors and reports the progress made regarding the commitments defined in the RAP. ✓ Reviews internal monitoring activities, records and reports and proposes solutions to verify compliance with RAP commitments and identify problem areas in RAP implementation. ✓ Monitor compensation and mitigation implementations and evaluate the appropriateness of the activities ✓ Verifies that measures for the restoration of livelihoods are implemented and evaluates their effectiveness and suggests corrective measures to PIU if any required

13.2. Implementation Schedule

Table 13-3 RAP Implementation Schedule

[illegible]

[illegible]

Appendices

It is presented in a separate file.