



REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE

AYEM
Altyapı Yatırımları Genel Müdürlüğü



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ENGINEERING
CONSULTANCY INC.



**ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY
CONNECTION PROJECT
RESETTLEMENT PLAN
CNR-ADN-RP-002
Final**

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ABBREVIATIONS & ACRONYMS

BOTAŞ	Petroleum Transportation with Pipelines Joint Company
CİMER	Presidency's Communication Center
CLO	Community Liaison Officers
CLS	Community-level Survey
CPI	Consumer Price Index
DGII	General Directorate of Infrastructure Investments
DSI	State Hydraulic Works
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
FGD	Focus Group Discussions
GLAC	Guide to Land Acquisition and Compensation
GM	Grievance Mechanism
HLS	Households-level Survey
IFI	International Finance Institution
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MoAF	Ministry of Agriculture and Forestry
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTI	Ministry of Transportation and Infrastructure
NCA	Non-cadastral Area
NTD	Note to Draft
OIZ	Organized Industrial Zone
PAH	Project Affected Household
PAP	Project Affected Person
PIU	Project Implementation Unit
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SSI	Social Security Institution
TUIK	Turkish Statistical Institute
WB	World Bank
YİMER	Foreigners Communication Center

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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 their 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 which persons, households, groups and/or communities affected by the Project are entitled to. 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 for project purposes.

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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 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 Household (“PAH”): A social unit consisting of a family and/or non-family members living together and affected by the project negatively and/or positively.

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

Resettlement: 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, 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 Plan (RP): 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.

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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 unviable. A specific size is not specified for the unusable part in this RP, 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.

Significantly Affected: Consideration of the scale of loss of productive assets as well as changes in institutional, technical, cultural, economic, and other factors may be important in determining the significance of economic displacement. In general practice, however, loss of 10 percent or more of productive land or assets from a household or enterprise often is considered significant.

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EXECUTIVE SUMMARY

The project is implemented by the Ministry of Transport and Infrastructure (MoTI) through its Directorate General of Infrastructure Investments (DGII), aims to increase rail freight efficiency in Türkiye by improving last-mile infrastructure connectivity (LMC), enhancing the operational efficiency of rail-enabled logistics centers, and strengthening institutional capacity in the rail intermodal and freight logistics sector.

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 Çukurova Region and İskenderun Bay – Toros, Adana, Yumurtalık Free Zone (TAYSEB) industrial centers and ports. The main purpose of the Çukurova Region and İskenderun Bay Railway Connection Sub-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 to the existing Toprakkale - İskenderun railway line at the existing Erzin Station.

The risk classification of the project is identified as “Substantial” according to the World Bank Environmental and Social Framework (ESF).

The General Directorate of Infrastructure Investments (DGII) is committed to supporting sustainable development and social prosperity in its works. This RP describes the objectives, principles, procedures and measures that will be adopted before, during and after the displacement of the Project affected people and assets. DGII is committed to comply with WB ESS5 in the development and implementation of RP.

This RP provides detailed information about the impacts of land acquisition and land use of the Project on the affected people/assets and further describes the approaches and measures to be adopted to prevent or minimize these impacts.

The socio-economic context of this RP is based on data collected during three rounds of field surveys. The initial survey was conducted in January–February 2020. Following this, on February 19, 2020, the General Directorate of Infrastructure Investments (DGII) submitted a project revision concerning the area to be used for the Erzin Port Station. This revision led to changes in the number and location of affected land parcels, prompting a second round of surveys in March 2020. Subsequent project design modifications again altered the scope of land acquisition, necessitating a third round of fieldwork in March 2024. Accordingly, the socio-economic baseline data have been comprehensively updated to reflect the current project footprint.

The planned right-of-way for the railway line is expected to have a maximum width of 60 meters. The Project components will require permanent land acquisition, primarily in the form of partial expropriation of affected land parcels. Where possible, design optimization was employed to minimize the need for private land acquisition, and treasury/public lands were prioritized during route planning. Despite these efforts, the acquisition of certain privately owned lands was unavoidable. Notably, land acquisition along the Osmaniye OIZ–Erzin Port railway line and at the terminal stations was kept to a minimum. However, due to the need to relocate the planned Erzin Port Station closer to the coastline, it became necessary to acquire privately owned agricultural lands in that area.

In 2024, in addition to the household surveys conducted earlier, a new Asset Inventory was prepared by the Directorate of Real Estate and Expropriation based on the updated list of affected parcels. This effort was undertaken to ensure the RP remains accurate, current, and fully aligned with World Bank standards.

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The Directorate of Real Estate and Expropriation implements a multi-step process each time new parcels are brought into the scope of the project. For every update, the Asset Inventory is re-initiated to reflect changes in land acquisition needs. As part of this process, ownership and user information is extracted from title deed and cadastre records using parcel numbers identified in the revised Expropriation Plan. Updated contact information for landowners and users is then obtained through official correspondence with the relevant directorates, including the Civil Registry Office. This updated information forms the basis for meaningful stakeholder engagement and compensation planning.

The Directorate also conducts land valuation studies covering not only the land itself but also any assets such as trees, plants, and crops found on the land. To ensure objectivity and fairness, valuation data is obtained through formal requests to relevant provincial institutions, such as Agricultural Directorates and Chambers of Agriculture, using average market prices from the last five years. These valuations are incorporated into compensation calculations.

To manage this process in line with national legislation, two formal committees have been established:

- The Valuation Committee, responsible for determining unit values of land and immovable assets, and
- The Valuation and Negotiation Committee, which engages directly with PAPs to negotiate compensation amounts based on these valuations.

In consideration of Türkiye's current economic conditions and ongoing inflation, the Directorate prioritizes rapid implementation of the valuation and compensation process immediately following the expropriation decision and ministerial approval. This approach is intended to reduce potential financial losses to affected persons by ensuring that compensation reflects recent and relevant market conditions.

As of 2020, a total of 133 land parcels were initially identified as required for the Project. However, following subsequent design revisions, 100 of these parcels were excluded from the project footprint and new areas were brought into scope. According to the updated Expropriation Plan prepared in 2024, the project now affects a total of 143 land parcels. Of these, 51 are privately owned—47 by individuals and 4 by legal entities—while 92 parcels are publicly owned. The total area required for permanent land acquisition amounts to approximately 1,451,707.56 square meters, with a significant portion of the public lands classified as industrial-use areas.

A total of 16 informal users have been identified as utilizing publicly owned lands within the project area. In addition, it was determined that 3 of these users also own private land parcels that are affected by the project, meaning they are both formal landowners and informal users. These dual-status individuals have been recorded accordingly, and their entitlements will be assessed in line with both their ownership and usage status, to ensure their inclusion in the resettlement process, further verification and documentation will be conducted through on-site assessments and stakeholder engagement. Verified informal users will be considered for compensation and livelihood restoration measures in accordance with the World Bank's Environmental and Social Framework. Detailed information on the updated Asset Inventory can be found in Appendix 1.

In line with the World Bank's Environmental and Social Standard 5 (ESS5), eligibility for resettlement entitlements is based on the following three categories:

1. Those who have formal legal rights to land or assets,
2. Those who do not have formal legal rights to land or assets at the time the census begins but have a claim to such land or assets that are recognized or recognizable under the national law,
3. Those who have no recognizable legal right or claim land or assets they occupy or use.

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All identified affected persons and households falling within these categories will be considered eligible for applicable entitlements as outlined in this RP.

In addition, key informant interviews were held with mukhtars (village/neighborhood heads) of all affected settlements. These interviews provided valuable community-level socio-economic information and supported the identification of both formal and informal land users. All users of the affected land—whether privately or publicly owned—have been recorded in the Asset Inventory and Census included in Appendix 1.

Potential Impacts of Physical and Economic Displacement

Affected Lands and Land Based Livelihoods

1. According to 88% of the representatives of the Project-Affected Household (PAH) representatives, they will be affected adversely because of the Project's land acquisition.
2. It has been identified that olive and citrus production is taking place on some of the publicly owned lands affected by the Project. Since the valuation process for the affected public and private lands were not completed, the number of affected trees and the adequacy of the compensation paid for the trees could not yet be examined.
3. The cost of trees located on private lands will be paid to the actual owner. No cutting cost/wood cost will be deducted from this compensation. In case such deductions are made in the land valuation reports, the deductions will be refunded to the tree owners from the RP fund.
- Two pasture areas will be partially affected by land acquisition. Although these areas are large and the proportion of land loss is limited, there is a potential risk of temporary access restrictions during the construction phase. Pasture use is particularly important for the village of Yukarıburnaz. The restriction is expected to be temporary; however, if construction activities result in longer-term or unforeseen access constraints, additional mitigation measures will be arranged to ensure continued access. There is a risk that the traditional pasture access patterns of the Yukarıburnaz residents will change. Therefore, this issue has been addressed within the LRP Two people stated that livestock activities may be adversely affected if the pasture access road is blocked. Livelihood restoration measures on the subject are defined within the scope of this RP.
- The number of household representatives who declared that they benefit from forests is five. Four of them take wood from the forest for heating purposes. It was learned that one household collects mushrooms and herbs from the forest, but the representative of this household does not expect this activity to be affected by the land acquisition of the project.
 4. If forest access is blocked due to construction activities, project officials should be contacted via GM. Access will be provided in a way that will not cause any loss of income to the affected people.
- Technical and feasible measures will be explored to provide access to natural resources / forestlands, and proper passages will be provided to restore access after construction by the Contractor.
 5. According to mukhtars, there are a total of 54 households engaged in fishing activity in the settlements affected by the land acquisition of the Project. In Hürriyet and Turunçlu settlements, these households could be affected by the land use of the Project, if necessary precautions are not taken. Seasonal workers come to Hürriyet and Aşağıburnaz settlements to work on agricultural activities.
 6. The approximate number of seasonal workers coming from Syria, Diyarbakır and Urfa for citrus picking is 2050. RP includes measures for the project to

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provide shelters (tents) during construction for seasonal workers who normally stay on the affected lands.

Affected Structures

A detailed asset inventory, including all structures located on affected lands, will be conducted by PIU in coordination with the Department of Real Estate and Expropriation, following the completion of the land valuation and expropriation process and the payment of compensation to PAPs. The compliance of compensation paid for structure, buildings and other assets with ESS5 will be examined during the implementation phase and at the end of the Project through an independent third-party completion audit.

Information about the affected structures was collected in the field study carried out during the RP preparation phase in 2020. Accordingly, 8 landowners/users declared that there were houses/dwellings on the affected lands, and 22 land owners/users declared that there were non-residential and non-commercial structures. It was noted in the Household Level Survey (HLS), that there was a commercial building on one of the lands. In addition, workplaces affected by the project were included in the household survey and in-depth interviews were conducted

. The compensation strategy in RP has been determined in principle according to the information here. However, payments to be made from the RP fund will be based on the Asset Inventory prepared as a result of the PIU corporate identification studies, following the land valuation.

Four lands belonging to Toros A.Ş. will be affected by the land acquisition of the project. Two of them are not used. Two pieces of land are used for commercial purposes (0/946, 0/1428). In addition, there is a public land used for commercial purposes (0/1792). Süper Enerji 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 the project. 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 the 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 by the RP Fund to prevent livelihood losses of current employees
- Any other loss that the business suffers do to closure or relocation of business

There are houses on the lands affected by the project, but since these houses are outside the expropriation boundary, there is no physical resettlement impact.

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Resettlement and Compensation Strategy

The resettlement strategy of the project has four components:

- Entitlement Matrix
- Livelihood restoration measures
- Vulnerability assistance
- Other mitigation measures

The Entitlement Matrix (EM) provides an overview of all rights and entitlements of PAPs within the scope of RP. The project will try to minimize involuntary resettlement and improve or at least restore livelihoods and living standards of displaced persons. The design of the project has been finalized. However, if there is a need for new land after the contractor is selected, compensation will be provided according to this EM and an addendum will be prepared to this RP. And if any adverse impacts not covered in this EM is encountered with the need for new land, the addendum will include additions to the EM as well.

If houses will be affected;

- Cash compensation for full replacement value (payment of expropriation compensation to the beneficiary, including access to debris and without deduction of depreciation).
- Before the building is demolished, households have the right to use all recovered materials, including, but not limited to, windows, doors, kitchens, bathrooms, metal parts, and wood 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. In case of deductions such as depreciation and debris costs these will be refunded to the owners.
- 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.

For the affected businesses;

- Cash compensation at full replacement cost (including expropriation compensation, right to debris and without depreciation) is paid.
- Before the building is demolished owners have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, wood in their structures.
- Süper Enerji, operating as a tenant of Toros Tarım, utilizes the affected site for commercial activities. The responsibility for the delivery and relocation of materials belonging to Süper Enerji lies with Toros Tarım. In the event that relocation requires the transport of these materials to a new site, the associated transportation costs will be covered by the RP fund.
- Support/service assistance 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.
- Support will be provided to affected persons in identifying and securing suitable alternative land, where necessary, as part of the Project's livelihood restoration measures. In order to establish the business in a new place without stopping operation / activity, it will be ensured that the new location is found by Süper Enerji and made ready before the project construction begins with consultations with the owner of company and the company's management. Any income loss will be compensated if the

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new facility is not put into operation before the construction of the project or if there is a business interruption/ work stoppage during the relocation.

- For tenants (e.g. Toros Tarım) loss of income due to relocation will be compensated for the duration (3-5 months) of relocation (disassembly, transportation and assembly) Amendments, repairs, paint etc. and other expenses to be made at the new location to be ready for operation will be covered to the extent that the new facility should not be of lower quality than the old facility. Transportation costs for machinery, equipment, and goods of 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 at full capacity.

For the affected lands;

- Cash compensation (including debris and depreciation costs) at full replacement cost is paid to the right full owners.
- If the remaining part of the land is "unviable" after partial permanent expropriation, the remaining parts will be expropriated under law.
- Cash compensation at full replacement cost is paid to the rightful owners.
- 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 by the Commission of the products and trees on the land.
- Agricultural training will be developed and implemented in cooperation with relevant institutions for farm owners and users whose livelihoods depend on agriculture and who have lost their land.
- Temporary or permanent employment opportunities, especially in cleaning, chauffeur, security, cookery etc. during the construction and operation periods will be offered to PAPs.
- 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.)

The impacts of the project on some PAPs are greater than on others. These are (1) vulnerable groups, (2) PAPs significantly affected by the project. Vulnerable groups consist of people such as female head of household, elderly, disabled affected by the land acquisition of the project. People significantly affected by the project are those who have lost more than 10% of their total land holdings, owners and users of parcels that have previously been affected by another project (multiple project impact), those who are landless public land users. Vulnerability Assurances will be provided to vulnerable PAPs, and livelihood restoration measures will be provided to people significantly affected by the project.

Vulnerable Groups such as elderly, woman, people with disability, and non-Turkish speaking groups. Vulnerable groups will be helped to access stakeholder participation mechanisms,

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compensation and other rights (Vulnerability Assistance). Efforts will be made to bring livelihoods and living standards as a minimum to levels prior to displacement. If people who are entitled to benefit from livelihood restoration measures (significantly affected people) have additional vulnerabilities, the amount of support they will receive increases according to their vulnerability and significance scores Appendix 2). Additional support will be provided, such as priority in employment or mobility support, access to legal rights or a bank to receive compensation.

Significantly Affected People: Livelihood restoration measures have been planned for following groups (significantly affected people):

- Owners and users of the parcels that have previously been affected by another project (multiple project impact),
- Landless informal users of impacted public lands,
- PAPs whose total land holding are affected by the Project more than 10%,
- Seasonal workers, whose housing conditions are affected
- Members of Yukarıburnaz settlement where pastures are affected by the Project.

For Vulnerability Assessment for these groups see Appendix 2.

Livelihood restoration instruments will be:

- Transitional Livelihood Support (TLS)
- Local Employment
- Trainings
- Pasture Improvement Project

Monitoring and Evaluation

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,

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

Completion audit: Ending both internal and external monitoring processes of the project, RP completion audit will provide a final indication that the that the expropriation, compensation and resettlement assistance are in compliance with the requirements of this RP and that restoration of livelihoods is sustainable, and no other intervention is required. The internal and external monitoring process will end with RP 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.

Stakeholder Engagement

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 RP 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.

DGII 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 RP.

This draft RP will be subject to public disclosure and consultation in accordance with WB ESS5 by PIU. Feedback received during this consultation will be integrated into RP and submitted to

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the World Bank's final approval. After the approval of the World Bank, DGII will publish both Turkish and English versions of the document on its official website, as well as sharing RP with the relevant Ministries, Local Authorities and Institutions. Arabic-language information materials will be prepared, if needed, to ensure inclusive and effective stakeholder engagement. The final RP will also be announced on the World Bank website with a separate link.

Guide to Land Acquisition and Compensation (GLAC) will be prepared to include detailed information about entitlements, eligibility criteria, valuation procedures and GM and distributed to PAPs during the engagement activities.

The Grievance Mechanism (GM) is an important tool of SEP and serves the purpose of addressing environmental and social impact-related complaints, opinions, suggestions, feedback, and questions by covering internal and external stakeholders under separate headings.

The grievance mechanism will be one of the tools to monitor the implementation of the RP. The RP identified the indicators to monitor the effectiveness of the RP 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 RP.

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1 INTRODUCTION

Among Türkiye's transportation investments, railways are the most substantial infrastructures, as highlighted by the 12th Development Plan¹ (2024-2028) prepared by the Republic of Türkiye Presidential Directorate of Strategy and Budget. The main purpose, in terms of railway transportation, is to enhance the efficiency, capacity, and safety of the railway system. This includes increasing the proportion of electrified and signaled railway lines, promoting the use of domestic means for designing and manufacturing rail system vehicles, and boosting the localization rate of critical components. The plan aims to advance the R&D, design, and production capabilities of the domestic industry, and to ensure comprehensive maintenance and repair of rail system vehicles and their sub-components, thereby contributing to the overall modernization and development of the railway transportation infrastructure in Türkiye.

During the 11th Development Plan period, studies were carried out to increase effectiveness and efficiency in transportation and logistics, reduce costs and ensure intermodal integration. The rate of electrified lines in railways has increased to 52 percent and the rate of signaled lines has increased to 58 percent, and significant modernization works are currently continuing. It is stated that the road-based system in freight and passenger transportation continued during the 11th Development Plan period, and that there is still a need to prioritize transportation investments focusing on freight transportation in order to increase road traffic safety, reduce environmental impacts, and transition to railway-connected multi-modal systems.

1.1 Project Background

The World Bank's Board of Executive Directors approved a loan for the Türkiye Rail Logistics Improvement Project (RLIP) on 30.06.2020. The project is implemented by the Ministry of Transport and Infrastructure (MoTI) through its Directorate General of Infrastructure Investments (DGII), aims to increase rail freight efficiency in Türkiye by improving last-mile infrastructure connectivity (LMC), enhancing the operational efficiency of rail-enabled logistics centers, and strengthening institutional capacity in the rail intermodal and freight logistics sector.

The project development objective (PDO) is to reduce transport costs in selected rail freight corridors and to strengthen institutional capacity at the Ministry of Transport and Infrastructure (MoTI) to deliver rail freight connectivity and manage rail-enabled logistic centers.

The project is developed around three main components:

- Component 1: Construction of Railway Branch Lines and Multimodal Connections at Priority Network Nodes,
- Component 2: Feasibility studies, detailed engineering designs, environmental and social documentation, and construction supervision for rail last-mile infrastructure connectivity at additional freight nodes,
- Component 3 – Covid-19 response support, institutional strengthening, capacity building, and project implementation support.

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 Çukurova Region and İskenderun Bay – Toros, Adana, Yumurtalık Free Zone (TAYSEB) industrial centers and ports. The main purpose of the Çukurova Region and İskenderun Bay Railway Connection Sub-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

¹ https://onikinciplan.sbb.gov.tr/wp-content/uploads/2023/11/On-Ikinci-Kalkinma-Plani_2024-2028.pdf

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existing Osmaniye OIZ, Ceyhan OIZ and Ceyhan Energy Specific OIZ to the existing Toprakkale - İskenderun railway line at the existing Erzin Station.

There will be constructed four stations in the Project.

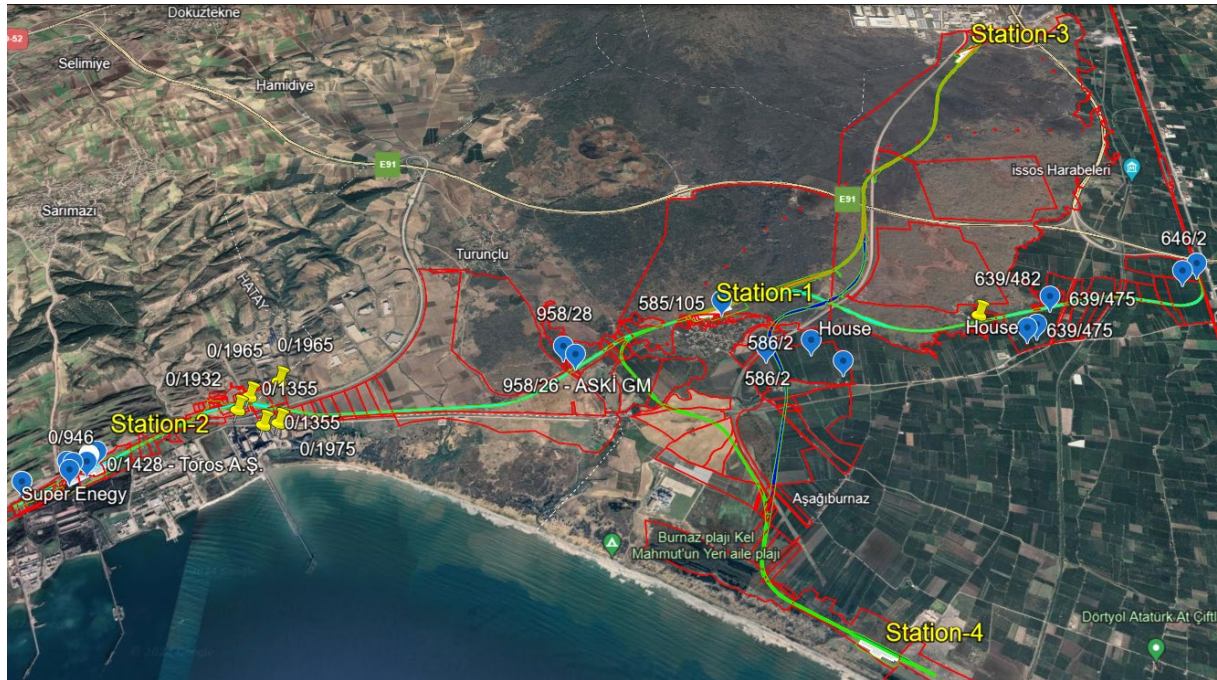


Figure 1. Locations of the stations

The risk classification of the project is identified as “Substantial” according to the World Bank Environmental and Social Framework (ESF). As a result, although the sub-projects have an exemption on Environmental Impact Assessment (EIA) according to the national legislation, an Environmental and Social Impact Assessment (ESIA), Resettlement Plan (RP), Stakeholder Engagement Plans (SEP), and Environmental and Social Management Plan (ESMP) have been prepared in compliance with the World Bank Environmental and Social Framework (ESF), and Environmental and Social Standards (Source: RP preparation field study - HLS, 2024) for the Project.

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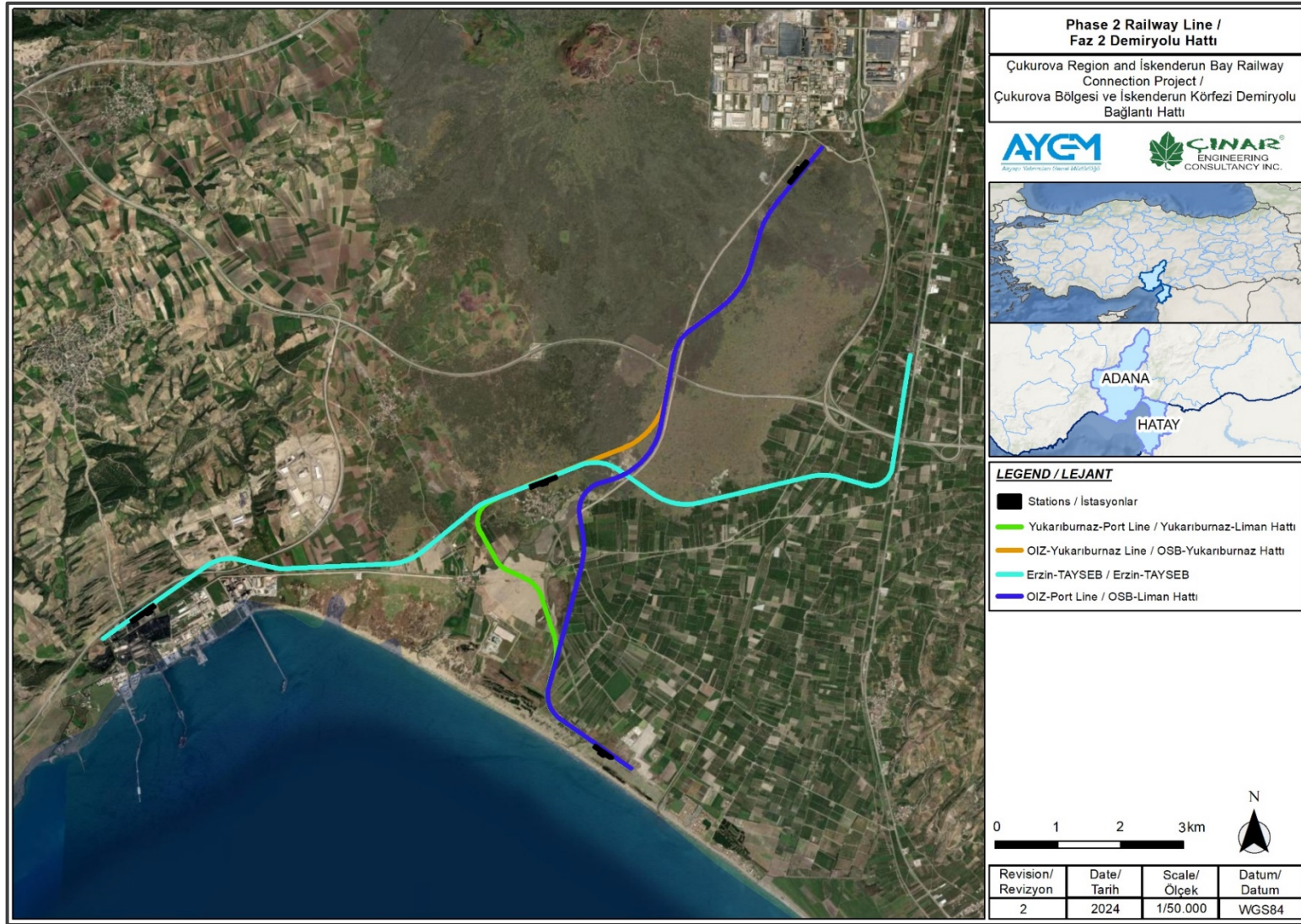


Figure 2. Çukurova Sub-Project Railway Design in Phase-2 (Revised Line)

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1.2 Objectives of RP

The General Directorate of Infrastructure Investments (DGII) is committed to supporting sustainable development and social prosperity in its works. This RP describes the objectives, principles, procedures and measures that will be adopted before, during and after the displacement of the Project affected people and assets. DGII is committed to comply with WB ESS5 in the development and implementation of RP.

The objectives of RP are as follows: ESIA

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

1.3 Scope of RP

The impacts of the Project land acquisition are set out in the ESIA and the basic principles of reducing these impacts are specified in the Resettlement Framework (RF). This RP provides detailed information about the impacts of land acquisition and land use of the Project on the affected people/assets and further describes the approaches and measures to be adopted to prevent or minimize these impacts.

The local socio-economic context of the RP was based on the findings of the first field survey conducted in January-February 2020. After the field study, DGII submitted a project revision in the area to be used for Erzin Port station on February 19, 2020. The number of parcels affected increased as a result of this revision. A second round of surveys were carried out in March 2020. However, after this date, the project was revised once again, and the affected lands changed. For this reason, a field study was conducted for the third time in March 2024 and the socio-economic baseline of the Project area was updated entirely.

The Project acts in accordance with WB ESS5 to minimize the impacts on the affected people and in the RP explains how to implement measures to minimize the resettlement impacts of the Project and monitor mitigation measures DGII 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 requirement in the

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Project's Environmental and Social Management System (ESMS) will also be applied to the RP and will be approved by the World Bank. However, for any revisions that may occur after final approval by the WB, addendums to this RP may be issued with the Bank's approval, provided that the entitlements outlined in this RP remain unchanged.

The project has reached its final design. However, if additional land is required during implementation, addendum(s) will be issued to this RP.

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2 LEGAL FRAMEWORK

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

2.1 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 the public interest, the government is authorized to initiate and execute an expropriation process. All hydropower, airport, highway and other roads, and similar large-scale infrastructure projects are considered to be in the public interest and provide the basis for Article 46. The Article refers to the Expropriation Law.

2.1.1 Expropriation Law

The specific article of the Constitution states that except in special cases the compensation value and the decreed increased value will be paid in full and cash to the users. The compensation to farmers farming the acquired land is paid in full and in cash, in any case. Private entities 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 compensation into PAP's 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 acquisition if and when land 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 responsible for performing the expropriation prepares or commissions a scaled plan indicating the borders, surface area, and type of the immovable assets or resources for which expropriation is to be constituted. It ensures that the owners of the expropriated immovable assets, their ownership (if no title deed registrations are present), and their addresses are identified. This is done by conducting an inquiry into the land registry, tax, and population registry records, as well as additional inquiries, and binding this information to the relevant documents.

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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 of the 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, the owner or its representative shall 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 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 Türkiye. 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 12 – Partial Expropriation

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

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

- Provided that there does not exist any change in the value of the non-affected part of the immovable property, the value of the partially expropriated immovable property shall be equivalent to the proportion to be expropriated at the amount determined for that immovable property according to the provisions of Article 11.
- If there is a decrease in the value of the non-affected part, the value of the partially expropriated immovable property will consist of the expropriation fee determined for the affected part of the immovable property in compliance with paragraph (a) plus the amount corresponding to the decrease of the value of the non-affected part.

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

Unviable lands:

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

Article 14 – Right to a Lawsuit

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

Article 18 – Dispute on the Ownership

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

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

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

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

As a result of the research conducted by the administration, it is determined that the immovable property that is not registered in the title deed, which is decided to be expropriated, is not among the public properties listed in Article 16 of the Cadastre Law No. 3402. If it is determined

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that the immovable property is in possession and that a claim has been made to acquire it by possession, experts carry out an examination. Evidence is collected and a report is prepared. In this report, the surface area of the immovable property, the identity of the possessor, tax registration, the starting date and duration of possession, and whether the conditions for gaining ownership have been met are stated.

The court determines the expropriation fee of the immovable property in the procedure and within the period specified in Article 10. If possession is accepted from the information and documents provided by the administration, the court notifies the possessor.

If there is no objection by the Treasury or a third party within thirty days from the last announcement, the amount determined by the court as the expropriation fee is deposited to the bank specified in the announcement on behalf of the possessor. If necessary, this period may be extended by the court for once. If the administration submits to the court the receipt stating that the expropriation fee has been deposited in the name of the possessor, the court decides to register the immovable property in the name of the administration and to pay the expropriation fee to the possessor, and this decision is notified to the land registry office and the bank where the money was deposited.

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 DGII 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 DGII 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 an 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.

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

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

The administration that requires the immovable, resource or easement rights identifies the fee according to Article 8 of Expropriation Law. It lodges a written application at the administration owning the asset by stating the amount it would pay based on this fee. If the owner of the asset

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fails to abide by the transfer and respond within sixty days, the conflict is settled via an affirmed decision within two months after being inspected by the relevant administrative office of the Council of State upon application by the receiving administration.

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

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

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

2.1.2 Forest Law (No. 6831)

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

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

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

2.1.3 Pasture Law (No. 4342)

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

Neither the right of the public nor of the specific users of pastures are recognized under the local legislative framework. Compensation will be paid for pasture lands to the relevant public agencies.

2.1.4 Cadastral Law (No. 3402)

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

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2.1.5 Agricultural Reform Law (No. 3083)

The Agricultural Reform Law regulates several issues for lands that are irrigated and that have been determined by the President. The Law covers matters regarding land consolidation and allocation of land for other purposes rather than agriculture in case of need. It is stipulated in the Law that in areas where agricultural production has no longer economic viability due to fragmentation, land consolidation works will be realized to prevent fragmentation that will result in affecting both on the livelihood and the work force of any family.

2.1.6 Notification Law (No. 7201)

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

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

2.1.7 Land Registry Code (Official Gazette No. 28738)

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

2.2 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.

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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, by 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 (DGII) prepared a RP 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 displace the laws and regulations on valuation and compensation;
- Establishing criteria for determining the resettlement eligibility of affected households; and
- A grievance procedure shall be available for complaints 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.

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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.

2.3 Gap Analysis between National Legislation and International Standards

There are several gaps between international standards and national legislation with regard to land acquisition, resettlement and compensation and livelihood restoration. First, under Turkish law, RP 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 Annex-1 and Annex-2 of the EIA Regulation). In addition, within the national legal framework, there is a lack of specific requirements for consultation and disclosure of RP and Social Impact Assessment (SIA). The activities relevant to RP 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 Table 1.

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Table 2-1. Gap Analysis between Turkish Legislation and World Bank Group Standards

Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
Census and Asset inventory and cut-off-dates	Borrower will, as part of the environmental and social assessment, conduct a census to identify the persons who will be affected by the Project, to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	Turkish Law requires preparation of inventory of assets. Land acquisition through expropriation requires the preparation of a census (full count) of affected immovable assets, and a full list of their owners, not users. According to Turkish Constitution, private users on public lands are not addressed by local laws or regulations unless they have an official rental agreement with the government.	National requirement is limited to census of immovable assets and legal titleholders. Users are not included in the census.	An assets inventory has been prepared. All owners and assets are identified by Administration. Users including informal users are identified in the scope of RP preparation studies and an Asset Inventory and Census in line ESS has been prepared (Appendix 1). The cut-off date is the date when the "asset inventory observation" is made and the assets on the land are recorded.
Requirement to prepare a Resettlement Plan	According to ESS5, in the case of economic and / or physical displacement, the Borrower will develop a Resettlement Plan.	No legal provisioning forces the Project proponents to prepare resettlement action plan under Turkish Law.	Resettlement planning is a key gap, since resettlement-related documentation only includes cadastral information, asset list and compensations. Livelihood impacts and losses are not addressed.	This gap has been addressed by the preparation of the RP in compliance with ESS5.
Compensation at Full Replacement Value	According to ESS5, when land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, the Borrower will offer affected persons compensation at replacement cost, and other assistance as may	Valuation of agricultural land depends on capitalization of annual net income calculated by taking market prices into account. According to Article 3 of the Turkish Capital Markets Board (CMB) Communiqué on Valuation Standards in the Capital Markets (III-62.1), which came into force by being published in the Official Gazette dated 01.02.2017 and numbered 29966, it is stated that "In the valuation activities carried out by the Turkish Appraisers 'Association and the Turkish Capital Markets Association" is mandatory to comply with the	Lands are compensated at full replacement value. Compensations of fixed assets (trees and structures) are not at full replacement cost as it deducts certain items (depreciation, cutting costs, etc.).	The project will be following the ESS5 requirements and compensation will be made at full replacement cost by establishing the RP Fund by DGII and covering the gaps in the amount between the expropriation payments and full replacement cost.

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
	be necessary to help them improve or at least restore their standards of living or livelihoods. Economically displaced persons who are without legally recognizable claims to land will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost.	published International Valuation Standards." Accordingly, the lands are valued in accordance with ESS5. Buildings are compensated by use of their cost of construction given by reference values defined by MoEUCC and market value. However, depreciation and debris costs are deducted from calculated values.		
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 home; this provisioning exceeds international standards. 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 usucapion is only for immovable property which is not registered in the title deed.		Impacts on dwellings have been eliminated through design. If dwellings are affected, they will be handled individually for each case in accordance with this RP and WB ESS5. DGII 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

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
	Homes and residential land will be compensated at replacement value. Amortization is not allowed. Rural, urban and residential land is compensated at market prices.	Lost homes are not compensated at replacement value. Homes are compensated at their cost of construction with high quality material in the market. Amortization is taken into account. Residential land is compensated at its market prices, by using a net capitalization method.		accordance with this RP and WB ESS5. Cash compensation will be provided at a 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.
Loss of Business	In cases where land acquisition or restrictions on land use affect commercial structures, affected business owners will be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment.	National legislation provided compensation only for the loss of property and/or structures.	National legislation does not have provisions for the compensation of business owners for the loss of income caused by expropriation.	Compensation will be paid from Expropriation Budget of DGII. However, full replacement cost that the legal legislation does not cover will be provided by the RP budget of DGII according to Entitlement Matrix of this RP (Chapter 8).
Land Entry	According to ESS5, land cannot be entered for construction purposes without	According to Turkish Constitution, even when land is acquired for a public interest, expropriation agencies cannot benefit from the expropriation of private lands and	There is no gap in terms of access to the land, but since the compensation for the replacement fee will be paid	This gap will be covered by DGII through the RP Fund of the Project.

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
	compensation to the landowners for the replacement cost.	assets without paying into a bank account the value of the expropriated assets in advance of land entry.	from the RP fund, the completion of expropriation is not sufficient for entry to the land.	RP requirements will be followed through protocols to be signed by owners/users during the entry and exit stages of the land.
Compensation for Loss of Communal Assets	For persons whose livelihoods are natural resource-based and where project-related restrictions on access are envisaged, implementation of measures will be made to either allow continued access to affected resources or provide access to alternative resources with equivalent livelihood-earning potential and accessibility. Where appropriate, benefits and compensation associated with natural resource usage may be collective in nature rather than directly oriented towards individuals or households.	Communal assets are compensated according to Article 30 of Expropriation Law. Properties owned by public institutions cannot be expropriated but only can be a subject to transfer. There is no compensation for displaced persons benefiting from pasture lands and forest lands.	Communal users of public lands and common properties such as pastures, forestry lands, treasury lands or lands under the jurisdiction of other state bodies are not recognized and/or compensated.	If there has been loss of income due to land acquisition and temporary access barrier in the use of communal assets, community level or household level compensations will be provided from RP Fund.
Treatment of squatters / informal land users	Project-related losses of the affected people should be compensated in full and in cash before the actual acquisition of immovable assets or access to land and informal users should be added entitled to compensation.	Renters of houses and/or workplaces, tenant users of the land, formal and informal users of public and forest areas and merchants without immovable property are not entitled to expropriation compensation. According to Turkish Constitution, private users on public lands are not addressed by local laws or regulations unless they have an official rental agreement with the government.	There is no compensation in Turkish Law for informal users/squatters on public lands. Eligibility is based on legal ownership of land. When the owners of buildings on public lands are documented with documents other than title deeds, compensation can be	Within the scope of the RP, a study was carried out to identify informal users (See Appendix 1 – Asset Inventory and Census)

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
			provided according to Article 18 of the Expropriation Law.	
Measures for Vulnerable Persons	Particular attention should be paid to the needs of vulnerable groups, especially those below poverty line, the landless, the elderly, women and children. Livelihood restoration planning should provide special assistance to women, minorities, or vulnerable groups.	Under the Turkish Constitution, the State guarantees its citizens to continue their lives in peace and security, and also socioeconomically encourages them to reach a higher standard of living. In this context, the State applies several rules and measures to protect and support its needy, weak, helpless, and homeless citizens.	Turkish legislation does not specify vulnerable groups under Expropriation Law.	Within the scope of RP, vulnerable groups among PAPs were identified and entitled. RP. PAPs that have an existing vulnerability will be provided with Vulnerability Assistance and livelihood restoration.
PAPs suffering significant impact	Consideration of scale of loss of productive assets as well as changes in institutional, technical, cultural, economic, and other factors may be important in determining the significance of economic displacement. In general practice, however, loss of 10 percent or more of productive land or assets from a household or enterprise often is considered significant.	There is no national requirement to address significantly affected PAPs.	Turkish legislation does not specify PAPs suffering significant impact under Expropriation Law.	The household suffering more than 10% impact on land and assets will be entitled to receive livelihood support and PAH members will have priority in local employment and training (For details see Entitlement Matrix and Livelihood Restoration chapter).
Monitoring and Evaluation (M&E)	M&E is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	M&E needs to have a plan and a budget.	RP includes a M&E principle in accordance with WB standards.

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling measures in this project
	affected persons should be monitored for such projects.			
Information Disclosure	Disclosure of information and expects the Borrower to provide Affected Communities with access to relevant information on the purpose and duration of the Project and any risks to and potential impacts on such communities.	Public participation meetings are conducted by the requirements of the national EIA Regulation as part of the EIA process. This allows consultation with the Project-affected communities to a certain extent during the scoping phase of the national EIA process. Upon completion, EIA disclosure is compulsory. Public disclosure/information meeting is officially announced 10 days before the meeting.	Disclosure content is limited to EIA and does not include social issues / concerns.	A SEP specific to the sub-project was prepared SEP describes in detail Project disclosure and consultation. RP will be consulted and disclosed according to SEP.
Project-level Grievance Mechanisms (GM)	Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.	In the expropriation process under national law, the owner's consent is sought for the immovable property in the first instance but not always consent is achieved, and expropriation becomes compulsory. Expropriation involves compulsory appropriation of the immovable property by the State for public interest. However, Expropriation Law allows that the owner and occupant of the immovable property subject to expropriation and other concerned parties may file actions against the expropriation procedure or appraised values and errors of fact before judicial courts. Reference can also be made to the Law on the Use of the Right to Petition no 3071 and Law on the Right to Information. There is the Presidential Communication Centre (CİMER) which is a central unit where public complaints are handled.	There is no project specific grievance mechanism requirement.	The GM will allow the problems of PAPs to be resolved quickly, fairly and transparently without resorting to legal remedies. The functioning of the mechanism is presented in detail in the SEP.

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3 LAND NEED AND ACQUISITION PROCESS

3.1 Land Need 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 acquired.

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 the planned Erzin port towards the coast meant that the Erzin port station has to be built on private agricultural lands.

In 2020, a total of 133 parcels were estimated to be required for the project. After the project revision, 100 of these parcels were out of scope and new lands were expected to be affected. According to the updated expropriation plan in 2024, there are 143 affected parcels. 51 parcels are private (47 owned by real persons, 4 owned by legal entity/company) and 92 of them are public lands. For the construction of the project an area of 1451,707.56 m² is needed. The vast majority of public lands are industrial type lands. Informal users were identified in the arable ones (Appendix 1).

Table 3-1 Affected lands per settlements

Settlement	Private lands			Public lands		Total		
	# of parcels owned by real persons	# of parcels owned by legal entities	# of owners	# of parcels	# of public land users identified	# of parcels	# of owner/users	Size (m ²)
Aşağıburnaz	20	0	48	4	1	22	49	200260.85
Hürriyet	14	0	342 ²	11	5	25	347	531489.39
Sarımazı	1	4	6	37	0 ³	42	6	245140.45
Turunçlu	3	0	8	15	2	17	10	126628.50
Türkmen / Büyük Tüysüz	0	0	0	1	0	1	0	13310.93
Yukarıburnaz	13	0	61	24	8	34	69	409068.63
Total	51 ⁴	4	465	92	16	143	481	1,451,707.56

² There are many shareholders on the title deed but not in the settlement and/or on the land. For these lands, owner-users in the settlement and on the land were reached within the scope of the RP field study.

³ Industrial area; not arable.

⁴ 18 out of 47 parcels have ongoing court cases, the deeds are passive and no information on the owner/shareholders is available. "Passive" means that information about the parcel cannot be accessed from the parcel information system and therefore the owners cannot be identified at the moment in the scope of RP study. The expropriation fees for passive lands are deposited into a escrow account and the right owners are awaited to be determined.

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Source: Available expropriation data, 2024

3.2 Land Acquisition Steps

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

1. Determining which borders 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
 7. Provision of title deed records from the Land Registry Directorate where the immovable is recorded
5. Identification of owners/shareholders
6. Provision of population and succession information of the owners from the relevant Registry Office
7. Identification of full right holders
8. Address investigation of right holders (relevant Registry Office, Land Registry, Police, Gendarmerie, Municipality, Mukhtar)
9. Establishment of the Appraisal Commission
10. Establishment of Reconciliation Commission
11. 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
12. If the type of real estate is "Arable Land";
 - a. Requesting agricultural economic data from the relevant Agricultural Directorate
 - b. Collecting 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;

1. Preparation of declarations
2. Technical control and approval from the relevant Cadastre Directorate
3. The completion of the submission procedures of the approved declarations from the related land registry office.

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
1. Preparing expropriation plans and determining expropriation areas on parcel basis
 2. Establishment of an expropriation valuation commission

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3. Determination of the market prices of the immovable to be expropriated
4. Receiving market prices from the General Directorate of National Real Estate
5. Preparation of the valuation report
6. Beginning of Land Identification Process
7. If a local expert will be requested;
 - a. Requesting the local expert from the Local Authority
 - b. Or establishment of the detection commission
8. Identification and assessment 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
 8. Establishment and approval of the determination minutes
9. Notification of the right holders to be negotiated with about the immovable properties within the scope of expropriation as registered contractors
10. Right holders notifying whether they can participate
 9. Notification of the place and time of the reconciliation meeting to the right holder

If an agreement was reached in the reconciliation meeting;

1. Preparation of purchase minutes to be signed in case of agreement
2. 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;

1. In case of no agreement, disagreement minutes are prepared
2. Cost determination and registration case process
3. Submission of the immovable parcel information to the legal unit, in which disagreement minutes are issued
4. 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;

1. 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;

1. The storage decision by the court to the Administration
2. Submission of the receipt of the payment to the court
3. The reasoned decision of the court comes to the administration

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

1. If it is not certain in terms of registration, taking a court decision from the court
2. 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;

1. Submission to the upper court (Appeal-Supreme Court)

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

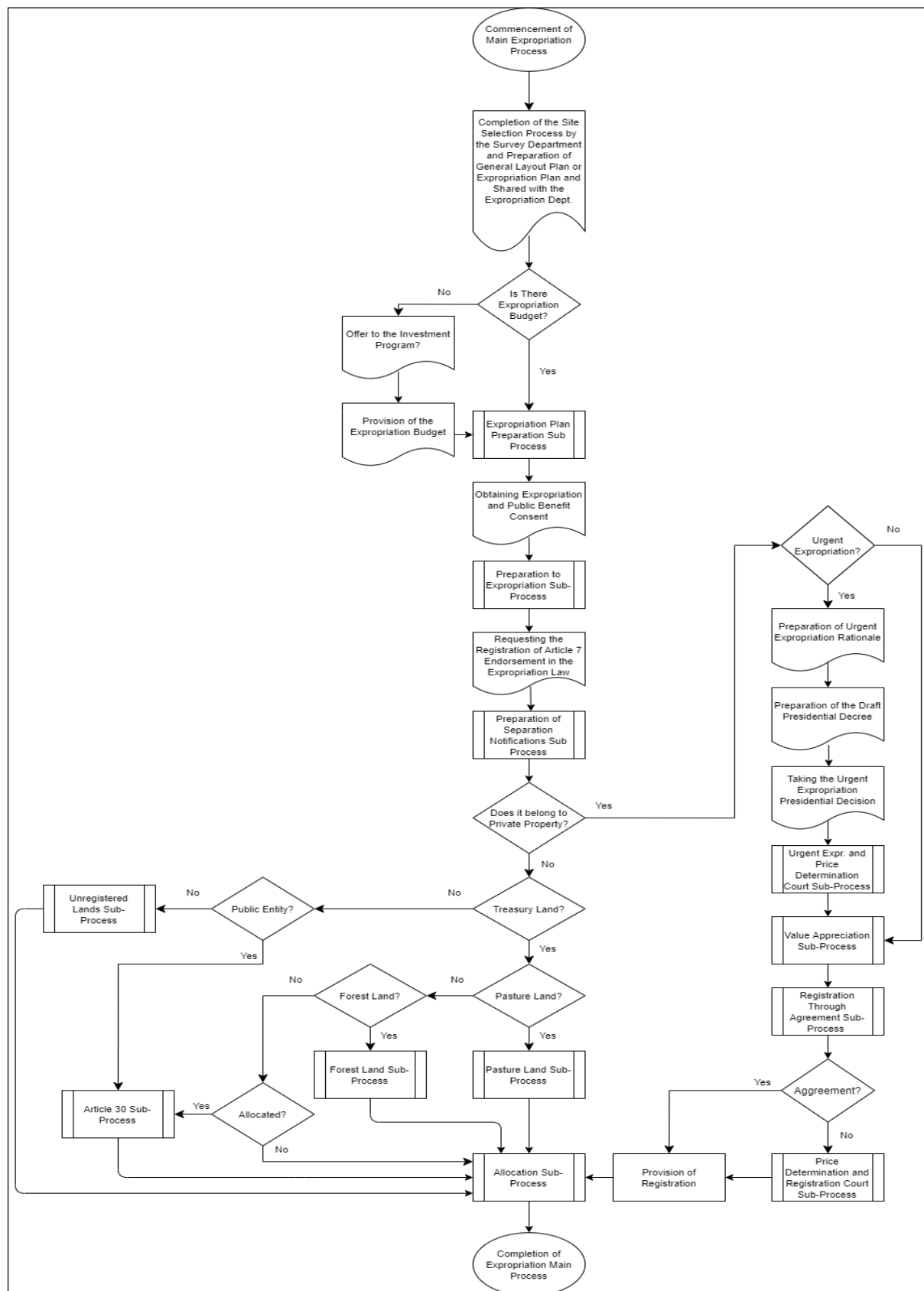


Figure 3. DGII Land Expropriation Flow Chart

In this process, which proceeds in accordance with national legislation, the identification of users, especially informal public land users, remains incomplete. This gap has been resolved

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with the RP preparation field study in 2024 (See Appendix 1 - Asset Inventory and Census). The valuation process is ongoing, and given the high inflation rate in Türkiye, efforts are being made to ensure that the assigned values do not decrease, so that affected persons do not incur losses. Current market data is being used to reflect up-to-date and fair compensation values.

The detailed budget will be prepared during the implementation phase by following the principles in heading 3.5. of this RP by AYGM PIU before any civil work starts.

During field visits, interviews were held with landowners and headmen to identify the users of each parcel. The identified users were added to Appendix 1. Household surveys were conducted with users. To determine users' livelihood losses, total land assets and the impact rate of land acquisition of the project were examined, and information was provided on household vulnerabilities and livelihood patterns.

3.3 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 Table 3.

Table 3-2. Land Rights Required by Project Components

Project Component	Land Right	Provision	Duration	Responsibility
Project lines (railway, highway), engineering structures, stations and substations	Ownership rights	Land acquisition is permanent, and ownership rights are registered in the name of MoTI. As permanent facilities shall be constructed on the referred land, it will not be possible for the former landowner 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 a certain duration under mutually agreed terms and rates. Once the contract expires, land is handed back to the 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 engineering structures (such as bridge, tunnel, aperture etc.), stations and transformer centers that will be built under the project. Land use rights are established permanently, and 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).

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3.4 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 not in line with WB ESS5 in some respects. In acquiring affected immovable assets DGII will devote maximum effort to negotiate willing buyer-willing seller arrangements. DGII 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, DGII 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. The 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, the 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:

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

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, an Escrow account or a trust account to be paid in three monthly installments in the event of disputed ownership, and to be paid to the person proved to be the owner
- Market-based interest rates are charged for the value of 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 DGII, 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, DGII will explicitly allow for full replacement cost for buildings and will ensure that lost income is fully restored via the RP Fund throughout the compensation process. For those vulnerable and with

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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:

- Market price criterion
- 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:

- location
- shape
- physical structure of the soil
- road frontage
- width of the road by the plot
- 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 compensate 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 the 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 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. The shape is also important, on the basis that

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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.

- The formula used for capitalizing the net income from annual plants is, $S_o = s / f$
- 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.

The 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.

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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:

- Proximity to a city or town
- Proximity to access roads (land, railway, airport)
- Distance to healthcare services
- Favorable transportation conditions
- Buildings (if any) in good condition
- Undivided land
- Geometrically well-shaped land
- Property safety
- Ease of purchasing and selling
- Adequacy of security services
- Land registered before the cadastral office
- High population densities
- Easily changeable rotational cultivation system
- Favorable irrigation conditions if it is an irrigated land
- 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, DGII 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 crops are identified on it, 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 DGII, headman of village (Mukhtar) and experts from Official Agricultural Institutions. Payment for compensation is made 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 Türkiye, people who have encroached on public and/or private land and planted

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trees and crops (or built immovable assets) are compensated for these assets (but not for the land).

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. If the land is cultivated by a tenant and the lease agreement is active, any crops/produce on the land belong to the tenant. In this case, the tenant will be given time to harvest the standing crop. Crop payment is provided for crops that cannot be harvested due to the urgency of the construction. Users will be informed in advance by the Contractor so that the expropriated lands are not planted a second time.

3.5 Eliminating Valuation Gaps

This Resettlement Plan (RP) comprises the determination of compensation and identifies the compensation deductions which are not in compliance with ESS5 and stipulates that these be reimbursed along and any gap in values be included in the RP budget. Since the expropriation and land valuation processes have not yet been completed, it is not possible at this stage to assess the compliance of compensation with ESS5. Therefore, a principle-based estimated Resettlement Plan (RP) budget has been prepared, rather than a detailed, parcel-specific budget. The detailed budget will be developed during implementation by the DGII PIU, once the final project alignments are identified by the contractor. Based on the finalized alignments, the PIU will either update the existing RP or prepare an addendum in line with the principles outlined in this RP.

DGII has gained experience in international standards by carrying out many IFI-supported projects in the last five years. It requests a valuation in accordance with international standards from the valuation companies it receives services from⁵. However, when other DGII projects are examined, some incompatibility between national valuation practices inherent in the existing Expropriation Law and international standards are detected. Based on other project experiences, these non-conformities, which must be paid from the RP fund

- Depreciation deductions on buildings and other structures,
- Debris fee deductions in buildings and other structures,
- Reflecting the cost of cutting trees to the tree owner,
- Loss of livelihood in cases where the project has significant impacts on livelihoods,
- Loss of time in the process of preparing new land or business,
- Temporary livelihood losses resulting from access barriers to areas used by the community,
- Livelihood restoration of informal users of the affected lands and compensation for any loss of assets.

Compensation payment in accordance with ESS5 will be made by not making the deductions listed here and by providing the support planned in the RP.

3.6 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

⁵ According to Article 3 of the Capital Markets Board (CMB) Communiqué on Valuation Standards in the Capital Markets (III-62.1), which came into force by being published in the Official Gazette dated 01.02.2017 and numbered 29966, "In the valuation activities carried out, the Valuation Experts Association of Turkey and the Turkish Capital Markets Association " it is mandatory to comply with the published International Valuation Standards."

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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 World Bank ESS5, the cut-off date is typically the date on which the census begins. In this case, the census survey was conducted in March 2024, and the scope of impacts presented in this RP is based on the findings of that survey. For any additional land required after the construction contractor has finalized the alignment, the cut-off date for eligibility will be the date on which the asset inventory for the additionally affected lands is prepared. Such additional acquisition and compensation will be covered through an addendum to this RP.

3.7 Eligibility Criteria for Defining Various Categories of PAPs

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

- (1) Those who have formal legal rights to land or assets,
- (2) Those who do not have formal legal rights to land or assets at the time the census begins but have a claim to such land or assets that are recognized or recognizable under the national law,
- (3) Those who have no recognizable legal right or claim to land or assets they occupy or use.

Those covered under the first and second category are entitled to be either compensated and/or resettled for their losses according to the national legislation and will be compensated as per this RP. Those covered under the third category do not have legal rights according to national legislation. But DGII commits that they will also be provided with livelihood supports as stated in the RP to achieve the objectives set out in ESS5 through the available sources and budget of DGII. DGII will cover additional supports such as livelihood restoration measures, compensation for loss of structures, animal feed, moving 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.

3.8 Status of other components and project revisions

The location and technical specifications of the Project components such as construction/camp sites, ETLs, quarry and material burrow pits are yet to be determined. Therefore, the impacts caused by ETLs, quarries, material burrow pits and construction camp sites are not included in this RP. As the construction is foreseen to start in the first half of 2025, it is necessary that an Addendum to RP studies be carried out by DGII with the finalization of the locations of these project components and the preparation of expropriation documents by mid-2025. The resettlement issues resulting from the undefined project components will be addressed with one or more addendum studies to this RP, in line with the procedures, standards, and entitlement matrix given in this document.

This RP cover all lands that will be affected by the main components of the project.

Additional studies may be required if there are changes to the project route. The potential reasons for such change are outlined in the ESIA report. In the event of a route change, further consultations will be carried out with relevant institutions to determine and finalize the new alignment. The selection of the primary institutions consulted—namely the General Directorate of Cultural Heritage, Hatay Agriculture and Forestry Directorate, and State Hydraulic Works (DSI)—is based on the requirements set forth both in the Constitution of the Republic of Türkiye and the World Bank's Environmental and Social Framework (ESF).

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According to Article 63 of the Turkish Constitution, the State is responsible for protecting and improving the natural environment, ensuring sustainable use of natural resources, and preserving cultural heritage. In this context, the General Directorate of Cultural Heritage holds authority over the protection of archaeological sites and cultural assets potentially affected by infrastructure projects. The Hatay Agriculture and Forestry Directorate is mandated by national legislation, including the Forestry Law No. 6831 and Agriculture-related regulations, to oversee sustainable land use, forest conservation, and agricultural activities, which are directly relevant to project impacts on agricultural lands and natural vegetation. The State Hydraulic Works (DSI), established under Law No. 6200, is responsible for the management and protection of water resources, irrigation, and flood control, and therefore plays a critical role in evaluating potential hydrological impacts of project components such as borrow pits and construction activities.

The initial identification of these three institutions reflects compliance with both national legal obligations and international best practices. Additional consultations with other agencies will be conducted as needed depending on specific project developments and potential impacts.

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4 METHODOLOGY

Qualitative and quantitative research methods were used together, and the primary and secondary data were assessed together in the RP preparation study which is conducted to plan the physical and economic resettlement caused by the land acquisition requirements of the project. The scope of RP field work consisted of settlements and workplaces which are on the parcels to be 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,
- Loss of common properties and land such as pasture and forest land,
- Restriction of access to lands and common properties.

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

- Türkiye 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 Süper Enerji Coal Depot and Processing Plant Inc, Toros Tarım Sanayi and Ticaret Inc., Yumurtalık Free Zone Directorate and Osmaniye OIZ Directorate,
- Interviews with Mukhtars of Sarımazı, Turunçlu, Aşağıburnaz, Yukarıburnaz, Hürriyet in 2024
- Household surveys (HHS) performed with owners and users of parcels that are subject to land acquisition, conducted in January, February, March 2020 and in March 2024.

4.1 RP Preparation Field Studies

4.1.1 Field studies carried out in 2020

The first field study for preparation of the RP 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 RP field study, the surveyors were trained on data collection tools and the Project.

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

Landowners and users were reached through the mukhtars of four settlements affected by the land acquisition requirements of the project. Information on socio-economic profile of the owners and users of 64 affected parcels was obtained through household surveys, covering 45 households owning the parcels.

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

- Ownership of the land subject to land acquisition,
- Use 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,
- Impact rate on the total land holding of the owner/user,
- Whether the remaining part of the land will 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 on each PAP. The study aimed to focus not only on private lands and their legal owners / users, but also on public lands, formal/informal users and vulnerable groups.

4.1.2 Field study carried out in 2024

The land requirement for the Project changed significantly in Phase 2 and a new RP preparation field study was needed. Due to the revision, a new survey was carried out with the owners/users of the lands that were included in the impact area of the Project, as well as the owners and users of the lands that were already going to be affected by the Project before the revision. Additionally, updates were made to the questionnaire. The main reasons for updating the questionnaire and all field data are:

- It is expected that there will be changes in the livelihood patterns of households due to the rapid increase in inflation in Turkey in the last four years,
- There is a possibility that the PAPs on the land have changed,
- Changes in the population structure can be expected due to events such as war, migration and earthquakes that occur near the region.
- Between 2020 and 2024, DGII gained significant project experience in following international standards. This experience strengthened its institutional capacity. As a public institution, DGII wants to implement a similar resettlement policy in all its IFI supported projects in Türkiye in order to be fair and accountable. For this reason, innovations have been made in measurement and evaluation tools.

Accordingly, the survey conducted in March 2024 for the current socio-economic baseline of the RP is based on the following numbers.

Table 4-1. Numbers of household surveys

Settlement	Private lands				Public lands			Total		
	# of parcels owned by real persons	# of parcels owned by legal entities	# of owners	# of Household survey	# of parcels	# of public land users identified ⁶	# of Household survey with users of public lands	# of parcels	# of owners/users	# of survey
Aşağıburnaz	20	0	48	10	4	1	4 ⁷	22	49	12
Hürriyet	14	0	342 ⁸	7	11	5	3	25	347	10
Sarımazı	1	4	6	0 ⁹	37	0 ¹⁰	0	42	6	0
Turunçlu	3	0	8	1	15	2	3	17	10	4
Türkmen / Büyük Tüysüz	0	0	0	0	1	0	0	1	0	0
Yukarıburnaz	13	0	61	2	24	8	8	34	69	9
Total	51¹¹	4	465	20	92	16	16	143	481	35¹²

Source: RP field study, 2024

Owners/users of private lands and users of arable public lands were identified (Appendix 1).

Out of a total of 51 privately owned land parcels affected by the project, consultations were conducted with 35 users. Among these, 16 individuals were identified as informal users of publicly owned arable lands. Furthermore, it was determined that 3 of these 16 individuals are both informal users and formal owners of private land parcels affected by the project. These dual-status users have been recorded accordingly, and their entitlements will be evaluated based on both their ownership and land use status. Both owners/users of private lands and users of arable public lands have been identified (this information is detailed in Appendix 1).

- Stakeholders and users have been determined for a total of 51 private land parcels and 16 arable public land parcels.
- 3 of these 16 individuals are both informal users and formal owners of private land parcels affected by the project.
- A total of 35 households who own or use the affected lands have been interviewed.

4.2 Sampling Strategy

⁶ Also not a private land owner/user

⁷ 3 informal users are also private land users.

⁸ There are many shareholders on the title deed but not in the settlement and/or on the land. For these lands, owner-users in the settlement and on the land were reached within the scope of the RP field study.

⁹ Industrial area; not arable. Owners are one affected private land are investors, not local people.

¹⁰ Industrial area; not arable.

¹¹ 18 out of 51 parcels have ongoing court cases, the deeds are passive and no information on the owner/shareholders is available. "Passive" means that information about the parcel cannot be accessed from the parcel information system and therefore the owners cannot be identified at the moment in the scope of RAP study.

¹² 3 of PAPs both private land owner/user and public land user at the same time

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The sampling strategy for surveys is presented in Table 5. Representatives (mukhtars) of all affected settlements were interviewed. In these interviews, both community level information was obtained, and land users (formal and informal) were identified. Users of all affected private and public lands were identified and recorded in Appendix 1 - Asset Inventory and Census document with information from Household Level Survey (HLS).

Table 4-2. Sampling Strategy

Survey	Sampling	Implementation
Community-level survey (CLS)	The settlement heads in 6 settlements (based on the available expropriation data)	Semi-structured community level questionnaires with the 5 mukhtars in the affected settlements have been conducted. Since only a public land within the OIZ borders in OSMANIYE, TOPRAKKALE, TÜRKMEN/BÜYÜK TÜYSÜZ settlement was affected by the project, no headman meeting was held within the scope of CLS.
Household-level survey (HLS)	<u>Sample survey¹³</u> The owners (481 PAPs) and users of affected 51 private parcels. Public lands include roads, industrial parcels, raw soil etc. All of them are not suitable for agricultural activity. There are two pasturelands. 50 of the 91 public lands are arable.	The owner/user of 16 private lands could not be reached. For the detailed parcel-based information on these lands see Table 6. Some lands were left to the heirs of deceased owners over the years, and since no title deed transactions were made, the number of shareholders increased significantly. Therefore, the PAP count appears high. However, these shareholders are not "on the land" or in the project-affected settlement. Especially efforts are made to reach people on the land and in settlements. 16 informal public land users have been identified and included the HLS implementation.
Affected business interviews	<u>Full census</u> <u>2 public land and 2 private lands owned by legal entity (Toros Tarım) used by two company (Toros Tarım and Süper Enerji)</u>	Affected business interviews were conducted by managers of two affected businesses.

4.3 Data Collection Tools

Data collection tools used in the RP 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.

Interviews were conducted with stakeholders who may be directly or indirectly affected by or interested in the Project and information was collected for RP 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 the Project.

¹³ Not all owners of the land in the land registry records, but owners who are mostly users in the village, were included in the socio-economic survey. Land users (owner-user, shareholder-user or only user) were identified by consulting the muhtar and villagers through land registry records and maps.

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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 RP 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.

4.4 Asset Inventory and Census

During the RP preparation studies in 2024 an effort was made to prepare an Asset Inventory and Census in accordance with ESS5 (Appendix 1). Besides landowners, all detected users (including tenants and informal users) were listed. Since the land valuation process was not yet completed, it was not possible to determine if the valuation was in compliance with ESS5 or not.

Census and identification work began with a meeting with the mukhtar. All PAPs on affected parcels (landowners and users) were identified. In particular, PAPs whose lands are a source of income were identified, while absentee shareholders of parcels were not reached. For the Census study, the following information was obtained by directly contacting the PAPs identified in the settlement and added to the parcel-based Asset Inventory:

- Livelihood patterns of the Project Affected Households (PAHs),
- Household population,
- Vulnerable household members,
- Impact rate on livelihood,
- Total land holding,
- Parcel size,
- Size of acquired area,
- Vulnerabilities.

4.5 Limitations for RP Study

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

- The property ownership pattern in Türkiye is complex. Although some landowners have died, the inheritance procedures have been neglected, so the land registry records contain the names of many heirs. These landowners live in urban centers and may not earn income from the affected land. Therefore, while the number of landowners is high, the number of users who are more affected by the land acquisition of the project is less than owners.
- Some of the parcels with multiple shareholders, these are the heirs of deceased owners and live in other cities. These shareholders are generally not dependent upon the affected parcels for their livelihood. Therefore, among the landowners, priority was given in the socio-economic household survey to landowners who use the land, live in the village, and engage in land-based livelihood activities,
- The identification of the absentee shareholders of land parcels was challenging: There are no official records regarding land users. Therefore, user identification was made for all lands by consulting the mukhtar, owners living in the village, other people living in the village, and maps and land registry records. During the identification, intensive efforts were made for a Census in accordance with

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WB ESS5, and in case of identified landowners not living in the village, these were contacted by phone.

- Some lands on which lawsuits are ongoing are in a "passive" position, therefore the land registry records could not be accessed. The locations of these lands were shown with the help of a map, and the owner-users were reached, and the rights holders of passive lands were also included in the socio-economic household survey.

13 private landowners or users could not be included in the HLS application. Detailed parcel-based explanations and evaluations regarding the reasons for this are presented in the table below.

Table 4-3. The private lands for which rights holders could not be reached

Settlement	Parcel	Explanation
ADANA, CEYHAN SARIMAZI	0/1733	The parcel owners are not local people. They are unknown in the region. It is thought that they bought land for investment purposes.
HATAY, ERZİN, AŞAĞIBURNAZ	621/1	Could not be reached (under lawsuit process)
HATAY, ERZİN, AŞAĞIBURNAZ	626/60	Owner user is identified but could not be reached
HATAY, ERZİN, AŞAĞIBURNAZ	626/61	Owner user is identified but could not be reached
HATAY, ERZİN, AŞAĞIBURNAZ	627/1	The parcel owners are not local people. They are unknown in the region. It is thought that they bought land for investment purposes.
HATAY, ERZİN, AŞAĞIBURNAZ	627/2	
HATAY, ERZİN, AŞAĞIBURNAZ	627/3	
HATAY, ERZİN, YUKARIBURNAZ	585/137	Could not be reached
HATAY, ERZİN, YUKARIBURNAZ	585/141	Owners are unknown by local people
HATAY, ERZİN, YUKARIBURNAZ	585/144	Owners are unknown by local people
HATAY, ERZİN, YUKARIBURNAZ	585/157	Owners are unknown by local people
HATAY, ERZİN, YUKARIBURNAZ	595/1	Could not be reached (under lawsuit process)
HATAY, ERZİN, YUKARIBURNAZ	596/17	Could not be reached (under lawsuit process)

Source: RP preparation field study, 2024

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5 CATEGORIES OF PEOPLE AFFECTED BY LAND ACQUISITION

5.1 Landowners

People who have legal titles 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 to 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 DGII.

5.2 Owners of fixed assets

5.2.1 Trees

Fruit trees such as oranges, tangerines, grapefruit, olives, carobs, and apricots 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.

5.2.2 Structures

By law, titled landowners also have rights to 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 RP. RP defines the groups that have rights to structures as follows:

- 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 actual owners of structures on the public lands

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

5.2.3 Other assets

There are also other assets on the parcels affected by the land acquisition of the project. These have been observed as structures and materials related to the irrigation system, warehouses, Their owners can be landowners, public institutions or land users. The canals and roads in the vicinity of 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 trees, structures, irrigation systems etc. located on the land to be acquired are also rights owners within the scope of RP. These users can be categorized in three groups: (1) formal (legal) users, (2) informal users, (3) agricultural workers and (4) beneficiaries of common properties such as pastureland and forestland. All groups hold various rights within the scope of RP.

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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 landowner. The formal user groups identified within the scope of RP 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)

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, informal users may receive some compensation depending on the type of public land that they use (excluding pasture and forest land which are common property – see below)). Informal land users identified within the scope of RP 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

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 RP is as follows:

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

5.3.4 Beneficiaries of the common properties

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

- Farmers who use pastures to graze their own animals,
- Herders who use pastures to graze animals which belong to someone else,
- People benefitting in other ways from other natural resources such as forestlands and rivers.

5.4 Owners of Businesses and employees

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There are two businesses, Süper Enerji and Toros A.Ş., which will be impacted by project activities according to the latest information from 2024. The parcel where both businesses are located is owned by Toros A.Ş., which also holds ownership of all permanent structures and fixed assets on the site, including buildings, internal infrastructure, and utilities. Süper Enerji operates as a tenant on the same parcel under a formal lease agreement with Toros A.Ş. Süper Enerji has all movable assets such as equipment and machinery used within the facility, but does not have any ownership rights over the land or structures.

5.5 Vulnerable Groups and PAPs that need special attention

The impacts of the project on some PAPs are greater than on others. These are (i) vulnerable groups, (ii) PAPs significantly affected by the project. Vulnerable groups consist of people such as female headed of household, elderly, disabled affected by the land acquisition of the project. people significantly affected by the project; those who have lost more than 10% of their total land holdings, owners and users of parcels that have previously been affected by another project (multiple project impact), those who are landless public land users. Vulnerability Assurances will be provided to vulnerable PAPs, and livelihood restoration measures will be provided to people significantly affected by the project.

5.5.1 Vulnerable groups

Vulnerable groups that may be affected by the Project were defined with an understanding of the socio-economic profile and potential impacts during the ESIA studies. However, these vulnerable group categories were redefined during the RP preparation as a result of detailed analysis of PAPs and listed below.

- Elderly people in need of care and social assistance,
- Disabilities (mental and physical),
- Unemployed (looking for a job),
- Women who have lost their husbands/divorced,
- Home-bound due to chronic illness,
- Illiterate adult,
- Refugee/migrant,
- Earthquake victim,
- Seasonal agricultural workers, including Syrian refugees.

“Women headed households” were not identified during the household interviews conducted with the full-census method.

5.5.2 Significantly affected people

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

- Physical displaced PAHs,
- Landless informal users of impacted public lands,
- PAPs whose total land holding are more than 10% affected by the Project (significantly affected),
- Seasonal workers whose housing conditions are affected
- Pasture users in Yukarıburnaz settlement where pastures are affected by the Project.

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The total of 51 privately owned land parcels and 16 publicly owned arable lands affected by the project were identified, as detailed in Appendix 1. Socio-economic household surveys were carried out with 35 households who either own or use these lands. Among the surveyed households, 16 were identified as informal users of publicly owned arable lands. Notably, 3 of these informal users were also formal owners of privately owned land parcels within the project-affected area, thus holding both formal and informal status.

Total land holdings are based on declaration. It should be supported by land registry records obtained from e-government during RP implementation. According to land registry records, PAPs that are determined to be affected by 10% or more of the total land assets of the project will be eligible for Livelihood Restoration Plan (LRP) supports.

Table 5-1 Impact rates on the total land holding of the affected households

Household code (For names ¹⁴ see Appendix 1)	Total land holding (m2) of the PAH	No. of affected parcels of the PAH	Total expropriated sizes on the affected lands (m2)	Impact rate (%) on total land holding of the PAH
1	11000	1	2546,48	23,15
2	137000	1	1681,57	1,23
3	80000	1	5009,53	6,26
4	165000	1	709,66	0,43
5	80000	1	4267,02	5,33
6	7765	1	4932,62	63,52
7	1562000	3	21696,78	1,39
8	117433	1	13745,55	11,71
9	8000	1	2133,51	26,67
10	25000	1	2133,51	8,53
11	100000	1	15559,15	15,56
12	No information	1	4443,74	NA
13	10000	1	633,42	6,33
14	58000	6	11895,04	20,51
15	53737	1	20043,03	37,30
16	37285	1	0,56	0,00
17	6430	1	3251,16	50,56
18	27223	1	992,71	3,65
19	15615	1	784,92	5,03
20	820000	6	55612,12	6,78
21	49000	3	5996,81	12,24
22	12000	1	3932,04	32,77
23	30000	1	3143,78	10,48
24	38000	2	3992,99	10,51
25	150000	1	3469,98	2,31
26	90000	1	3469,98	3,86
27	32000	1	3469,98	10,84
28	650000	3	29795,1	4,58
29	19000	1	2765,82	14,56

¹⁴ Private info will be removed in disclosure process.

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Household code (For names ¹⁴ see Appendix 1)	Total land holding (m2) of the PAH	No. of affected parcels of the PAH	Total expropriated sizes on the affected lands (m2)	Impact rate (%) on total land holding of the PAH
30	1000000	3	19038,26	1,90
31	30000	5	7212,12	24,04
32	23000	1	323,58	1,41
33	34000	1	22,71	0,07
34	25000	2	5917,53	23,67
35	58000	1	1434,84	2,47

Source: RAP preparation field study and expropriation list

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6 SOCIO-ECONOMIC AND DEMOGRAPHIC PROFILE OF PAPs

Information on the current socio-economic status of the PAPs has been determined by analyzing household surveys conducted among to PAPs and an Asset Inventory (Appendix 1) has been prepared on parcel basis with user identification.

The distribution of households reached within the scope of the survey and included in the HLS by location is given in the table. Two women and 33 men were interviewed, representing 35 households. Additional 12 absentee shareholders were not covered by the survey.

Table 6-1. Distribution of households by settlement

Settlement	# of households	Percentage (%)
Yukarıburnaz	9	25.7
Aşağıburnaz	12	34.3
Hürriyet	10	28.6
Turunçlu	4	11,4
Total	35	100

Source: RP preparation field study - HLS, 2024

According to the household survey, 16 individuals are private landowners/users, 16 individuals are users of public land, and 3 individuals are both public land users and private landowners. Officials of companies whose lands were owned and used by the project were not included in the household-level survey (HLS); instead, separate interviews were conducted with the affected businesses.

Table 6-2. Categories of HLS respondents

PAP type	
Surveyed private land owner/user (including the lands under court case)	16
Surveyed public land users	16
Surveyed private land owner/user and public land user	3*
Total	35

Source: RP preparation field study - HLS, 2024

**3 users are both public and private users*

When we look at the distribution by household population, it is seen that there are generally 3-5 people living in households.

Table 6-3. Distribution of PAHs by household population

Household population	Frequency	Percent
2	6	17.6
3-5	19	55.8
6-8	7	20.6
8+	2	5.8
Total	34	100
<i>No answer</i>	<i>1</i>	
<i>Grand total</i>	<i>35</i>	

Source: RP preparation field study - HLS, 2024

A total of 148 people live in PAHs. Among household members, the rate of women is 49.3% and the rate of men is 50.7%.

Table 6-4. Distribution of household members by gender

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Sex	Frequency	Percent
Woman	72	49.3
Man	74	50.7
Total	146	100
<i>Unknown (no answer)</i>	2	
<i>Grand total</i>	148	

Source: RP preparation field study - HLS, 2024

When we look at the distribution of household members by age, it is seen that 34.5% of them are younger than 26 years old.

Table 6-5. Distribution of household members by age

Age	Frequency	Percent
Under 26	49	34.5
26-35	19	13.4
36-45	13	9.2
46-55	21	14.8
56-65	18	12.7
66-75	14	9.9
75+	8	5.6
Total	142	100
<i>Unknown (no answer)</i>	2	
<i>Grand total</i>	148	

Source: RP preparation field study - HLS, 2024

When we look at the distribution according to the main sources of income, it was learned that the main source of income of 82.4% of the households is agriculture (crop production). This is followed by paid work (8.8%).

Table 6-6. Distribution of households according to their main sources of income

Main source of livelihood	Frequency	Percent
Agriculture (crop production)	28	82.4
Pension	1	2.9
Paid, salaried work	3	8.8
Business and self-employment income	2	5.9
Total	34	100
<i>No answer</i>	1	
<i>Grand total</i>	35	

Source: RP preparation field study - HLS, 2024

Household representatives were asked about their primary sources of income as well as their auxiliary/secondary sources of income, and multiple answer possibilities were given. Thus, a total of 78 responses were received from 35 household representatives. Accordingly, it has been observed that livestock (animal production) and rent earn, which are not among the main sources of income, are also included in the livelihood patterns of the households. Agriculture is the main livelihood 82.4% of the households but it is among the livelihoods of all households (100%). 61.80% of households have a pension among their sources of income.

Table 6-7. Main and auxiliary/secondary sources of livelihood

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Sources of livelihood	Responses		Percent of PAHs
	Number	Percent	
Agriculture (crop production)	34	43.60%	100.00%
Livestock (animal production)	2	2.60%	5.90%
Pension	21	26.90%	61.80%
Paid, salaried work	10	12.80%	29,40%
Business and self-employment income	10	12.80%	29,40%
Rent earn	1	1.30%	2.90%
Total answers	78	100.00%	

Source: RP preparation field study - HLS, 2024

When we look at the expenses of households, it is seen that agricultural expenses come first, followed by grocery and nutrition expenses.

When we look at the distribution of households according to the subjective perception of socio-economic status of household representatives, 73.5% have a medium socio-economic level.

Table 6-8. Subjective perception of socio-economic status of household representatives

Socio-economic status	Frequency	Percent
Good	7	20.6
Moderate	25	73.5
Bad	2	5.9
Total	34	100
No answer	1	
Grand total	35	

Source: RP preparation field study - HLS, 2024

The distribution of affected households according to the ownership status of the house they live in shows that the house ownership rate is 94.1%.

Table 6-9. Distribution of affected households by ownership status of the house they live in

Ownership status	Frequency	Percent
We live in our own house	32	94.1
We stay in our family's house without paying rent	2	5.9
Total	34	100
No answer	1	
Grand total	35	

Source: RP preparation field study - HLS, 2024

Households' total land assets were asked, and this information was recorded in the Asset Inventory (Appendix 1). When the data is analyzed collectively, it is seen that 21.43% of the households have land between 15,000 and 25,000 m2.

Table 6-10. Total land assets of PAHs

Total land holding (m2)	# of HH	Percent
2000-8000	3	10.71
8000-15000	3	10.71
15000-25000	6	21,43
25000-100000	5	17.86
100000-500000	4	14.29
500000-1000000	2	7.14

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Total land holding (m2)	# of HH	Percent
1000000-1800000	4	14.29
2000000+	1	3.57
Total	28	100.00
<i>No answer/land</i>	7	
<i>Grand total</i>	35	

Source: RP preparation field study - HLS, 2024

Household representatives were asked whether they were engaged in agricultural activities in this total land holdings and the following answers were received. 72.4% of respondents farm all of the land they own.

Table 6-11. Being engaged with agriculture on the lands owned by themselves

Answer	# of HH	Percent
Yes, entire on our lands	21	72,4
Yes, some of our lands	8	27.6
Total	29	100
<i>Missing</i>	6	
<i>Grand total</i>	35	

Source: RP preparation field study - HLS, 2024

Eight of the respondents are engaged in agricultural activities on lands belonging to others.

Table 6-12. Being engaged with agriculture on the lands owned by other villagers

Answer	#of HH	Percent
Yes	8	23.5
No	26	76.5
Total	34	100
<i>No answer</i>	1	
<i>Grand total</i>	35	

Source: RP preparation field study - HLS, 2024

58.8% of household representatives declared that they use public lands for agricultural purposes.

Table 6-13. Using public lands for agricultural purpose

Answer	# of HH	Percent
Yes	20	58.8
No	14	41.2
Total	34	100
<i>No answer</i>	1	
<i>Grand total</i>	35	

Source: RP preparation field study - HLS, 2024

The products produced are:

- Citrus,
- Banana,
- Tomatoes,
- Sweetcorn,
- Olive.

While 76.5% of households are members of the Farmer Registration System (ÇKS), one household is included in another insurance system.

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Table 6-14. Being included an agricultural insurance system

Answer	Frequency	Percent
Yes, Farmer Registration System (ÇKS)	26	76.5
Yes, other insurance system	1	2.9
No	7	20.6
Total	34	100
No answer	1	
Grand total	35	

Source: RP preparation field study - HLS, 2024

Four households affected by the project's land acquisition are also engaged in animal husbandry. Four households own a total of six cattle.

Table 6-15. Being engaged with animal husbandry

Answer	Frequency	Percent
Yes	4	11.8
No	30	88.2
Total	34	100
No answer	1	
Grand total	35	

Source: RP preparation field study - HLS, 2024

Project impacts on households whose socio-economic and demographic profiles are presented here are assessed in Chapter 7.

7 POTENTIAL IMPACTS OF PHYSICAL AND ECONOMIC DISPLACEMENT

7.1 Affected Lands and Land Based Livelihoods

7.1.1 Affected lands and agriculture

According to 88.2% of the representatives of the PAHs, they will be affected adversely because of the Project's land acquisition.

Table 7-1. Adverse impact expectation

Do you expect any negative impact due to land acquisition/use of the project?	Frequency	Percent
YES	30	88.2
NO	2	5.9
DON'T KNOW/NO IDEAS	2	5.9
Total	34	100
<i>No answer</i>	<i>1</i>	
<i>Grand total</i>	<i>35</i>	

Source: RP preparation field study - HLS, 2024

Representatives of 30 households who expected an adverse impact were asked what kind of impact they expected and were given the opportunity to give more than one answer (multiple answer options). Accordingly, a total of 132 responses were received from 30 households. All (100%) household representatives expect access and irrigation problems and additional costs in agricultural activities as the lands are divided. While the rate of those who expect an adverse impact on agricultural activities due to land loss is 96.7%, the rate of those who think that they will have difficulty in irrigating their other lands in case the irrigation system is damaged is 90%.

Table 7-2. Expected adverse impacts

Answers	Responses		Percent of PAHs
	# of answers	Percent of answers	
Adverse impact on agricultural activity due to land loss	29	22.00%	96.70%
Access and irrigation problems in agricultural activities and additional costs due to the division of lands	30	22.70%	100.00%
If the irrigation system is damaged, it will be difficult to irrigate other lands.	27	20.50%	90.00%
Loss of land value	17	12.90%	56.70%
Products will be damaged by dust arising from construction	25	18.90%	83.30%
Other	4	3.00%	13.30%
Total	132	100.00%	

Source: RP preparation field study - HLS, 2024

Expected specific impacts other than those in Table 72 are:

- The shareholder who owns the trees cannot receive compensation for the trees due to the ongoing lawsuit on the land (he will receive it once the lawsuit is completed).
- Fruit/product quality is expected to decrease.
- A loan cannot be taken out because there is an annotation on the title deed.

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7.1.2 Informal users

It has been determined that olives and citrus fruits are produced on public lands affected by the project. Informal user identification has been carried out on all public lands. The 16 informal users identified were included in the HLS application and added to the project's Asset Inventory and Census document (Appendix 1).

Informal users think that they will lose income due to the land acquisition of the project. According to Article 19 of the Expropriation Law, these people are already entitled to compensation for the trees they own on public land. However, if they cannot receive the cost of the trees they own, this cost will be covered from the RP fund.

7.1.3 Affected trees

Since valuation process for the affected public and private lands were not completed, the number of affected trees and the adequacy of the compensation paid for the trees could not be examined in detail. The cost of trees located on private lands will be paid to the actual owner. No cutting cost/wood cost will be deducted from this compensation. If such deductions were made according to land valuation reports, the deductions will be refunded to the tree owners from the RP fund.

Within the scope of the RP preparation field study, the total tree assets on the affected lands were identified as follows.

Table 7-3 Total tree assets on the affected lands

Block/ Parcel	Province	District	Settlement	Total amount of trees in the Land
626/57	Hatay	Erzin	Aşağıburnaz	150 Tangerine Trees, 17 Years Old
626/31	Hatay	Erzin	Aşağıburnaz	15 Citrus Trees, 17 Years Old
631/6	Hatay	Erzin	Aşağıburnaz	1200 Citrus Fruits, 5 Years Old
626/56	Hatay	Erzin	Aşağıburnaz	300 Citrus Fruits, 15 Years Old
626/54	Hatay	Erzin	Aşağıburnaz	350 Citrus Fruits, 20 Years Old
631/14	Hatay	Erzin	Aşağıburnaz	1200 Citrus Fruits, 2 Years Old
626/58	Hatay	Erzin	Aşağıburnaz	500 citrus fruits aged 20 years
623/1	Hatay	Erzin	Aşağıburnaz	25 Years Old 1400 Citrus Fruits
622/1	Hatay	Erzin	Aşağıburnaz	25 Years Old 18000 Citrus Fruits
623/2	Hatay	Erzin	Aşağıburnaz	25 Years Old 15000 citrus fruits
626/59	Hatay	Erzin	Aşağıburnaz	550 citrus fruits, 12 years old
585/57	Hatay	Erzin	Yukarıburnaz	500 olive trees, approximately 13 years old
585/53	Hatay	Erzin	Yukarıburnaz	240 Pieces of 12 years old Olive Trees
585/52	Hatay	Erzin	Yukarıburnaz	100 Olive Trees, 2 Years Old
585/47	Hatay	Erzin	Yukarıburnaz	140 Citrus Fruits at 9 years old, 240 Olives at 14 years old
585/51	Hatay	Erzin	Yukarıburnaz	150 Olives 10 years old
585/55	Hatay	Erzin	Yukarıburnaz	150 Olives 10 years old
585/56	Hatay	Erzin	Yukarıburnaz	100 Olives, 8 years old
585/110	Hatay	Erzin	Yukarıburnaz	300 Olives at 10 Years Old, 100 Olives at 2 years old, 15 Citrus Fruits at 7 years old
585/102	Hatay	Erzin	Yukarıburnaz	225 Olives, 15 years old
585/54	Hatay	Erzin	Yukarıburnaz	160 Olive Trees, 3 years old
585/103	Hatay	Erzin	Yukarıburnaz	250 Olive Trees, 10 years old
585/101	Hatay	Erzin	Yukarıburnaz	100 Olive Trees, 10 years old

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Block/ Parcel	Province	District	Settlement	Total amount of trees in the Land
586/2	Hatay	Erzin	Yukarıburnaz	8500 Citrus Fruits, 33 years old, 200 Olives, 12 years old
586/4	Hatay	Erzin	Yukarıburnaz	2000 citrus fruits at 8 years old, 1000 citrus fruits at 20 years old
596/5	Hatay	Erzin	Yukarıburnaz	1300 Citrus Fruits, 13 years old
585/105	Hatay	Erzin	Yukarıburnaz	60 Olives, 5 years old, 250 Oranges, 10 years old
585/104	Hatay	Erzin	Yukarıburnaz	90 Oranges, 10 years old
958/11	Hatay	Erzin	Turunçlu	1000 Citrus Fruits, 3 years old
639/478	Hatay	Erzin	Hürriyet	750 citrus trees, 8 year old
639/479	Hatay	Erzin	Hürriyet	350 citrus trees, 24 years old
639/472	Hatay	Erzin	Hürriyet	200 citrus trees, 44 years old
639/475	Hatay	Erzin	Hürriyet	600 citrus trees, 44 years old, 30 olive trees, 15 years old
646/2	Hatay	Erzin	Hürriyet	11000 citrus trees, 20 years old
645/3	Hatay	Erzin	Hürriyet	1500 20 year old citrus trees
645/5	Hatay	Erzin	Hürriyet	1500 20 year old citrus trees
639/481	Hatay	Erzin	Hürriyet	500 citrus trees, 25 years old
647/1	Hatay	Erzin	Hürriyet	400 citrus trees, 25 years old
647/5	Hatay	Erzin	Hürriyet	400 citrus trees, 25 years old
647/2	Hatay	Erzin	Hürriyet	250 citrus fruits, 25 years old
644/13	Hatay	Erzin	Hürriyet	300 citrus trees 40 years old, 100 olive trees 10 years old
639/465	Hatay	Erzin	Hürriyet	
645/1	Hatay	Erzin	Hürriyet	
646/1	Hatay	Erzin	Hürriyet	600 citrus trees 40-year-old, 200 olive trees 10 years old
639/471	Hatay	Erzin	Hürriyet	300 citrus trees 40-year-old, 100 olive trees 10 years old
957/12	Hatay	Erzin	Turunçlu	100 Olives, 5 years old
958/19	Hatay	Erzin	Turunçlu	200 Lemon trees, 5 years old
958/16	Hatay	Erzin	Turunçlu	450 Citrus Fruits, 5 years old
958/15	Hatay	Erzin	Turunçlu	500 Olives, 10 years old
958/27	Hatay	Erzin	Turunçlu	250 Citrus Fruits, 18 years old
958/28	Hatay	Erzin	Turunçlu	300 Olives, 18 years old
TOTAL				36.695

Source: RP preparation field study - HLS, 2024

7.1.4 Affected pasturelands and animal husbandry

Two pastures will be affected by the land acquisition of the project. Pasture areas are large and the impact rate is not high. However, there is a risk of access blocking.

Table 7-4. Affected pasturelands

Province	District	Settlement	Block	Parcel	Size (m2)
HATAY	ERZİN	HÜRRİYET	639	508	13661032
HATAY	ERZİN	YUKARIBURNAZ	585	1	5615619

Source: Available expropriation list, 2024

Pasture use is important for Yukarıburnaz village. The pasture access barrier will be temporary. The risk of permanent impact on pasture access in the Yukarıburnaz settlement is minor (Figure 4).

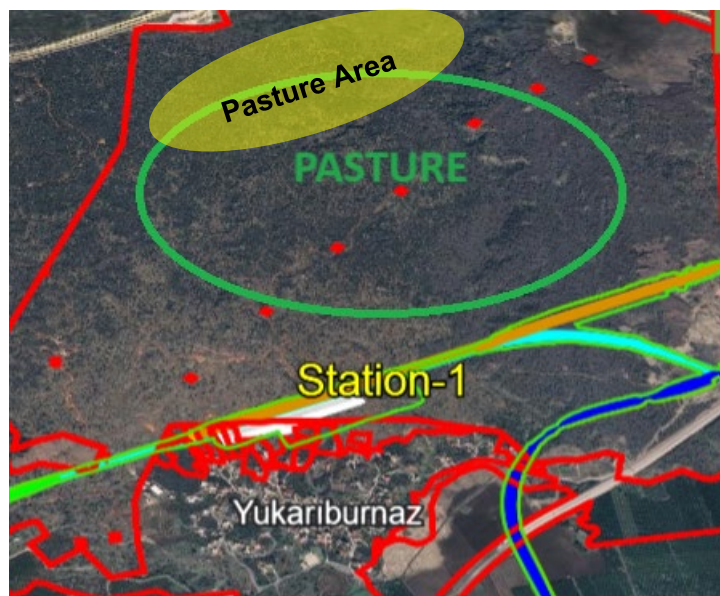


Figure 4. Pasture location of Yukarıburnaz settlement

The total number of animals in affected settlements, the number of households engaged in livestock farming and the number of households selling animals are as follows. It represents the number of households and animals that access barriers have the potential to affect.

Table 7-5. Numbers on animal husbandry activities in the PASs

Province	District	Settlement	# of households have cattle	# of cattles	# of households sell cattle	# of households have small cattle	# of small cattles	# of households sell small cattle
Hatay	Erzin	Hürriyet	50	300	40	45	4500	40
Adana	Ceyhan	Sarımazı	10	100	10	30	3000	30
Hatay	Erzin	Turunçlu	5	50	5	20	5000	15
Hatay	Erzin	Yukarıburnaz	5	30	5	3	500	3
Hatay	Erzin	Aşağıburnaz	13	60	13	2	1000	2
Total			83	540	73	100	14000	90

Source: RP preparation field study - CLS, 2024

Within the scope of this RP, pasture and livestock impact was evaluated at the community level. Within the scope of the household level survey, questions about the impacts on livestock activities were also asked to those whose lands were affected. Two people stated that livestock activities may be adversely affected if the pasture access road is blocked. Livelihood restoration measures on the subject are defined within the scope of this RP.

7.1.5 Affected forestlands and benefiting activities

The number of household representatives who declared that they benefit from forests is five. Four of them take wood from the forest for heating purposes. It was learned that one household collects mushrooms and herbs from the forest, but the representative of this household does not expect this activity to be affected by the land acquisition of the project. Representatives of households taking wood from the forest are concerned that this activity will be affected by the land acquisition of the project. Forests are not affected by the project.

Table 7-6. Benefiting from forestlands

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Answer	Frequency	Percent
Yes	5	14.7
No	29	85.3
Total	34	100
<i>No answer</i>	<i>1</i>	
<i>Grand total</i>	<i>35</i>	

Source: RP preparation field study - HLS, 2024

If forest access is blocked due to construction activities, project officials should be contacted via GM. Access will be provided in a way that will not cause any loss of income. Technical and feasible measures will be explored to provide access to natural resources / forestlands, and proper passages will be provided to restore access after construction by the Contractor.

7.1.6 Other land-based income generating activities

According to mukhtars, there are total 54 household engaged with fishing activity in the settlements affected by the land acquisition of the Project. In Hürriyet and Turunçlu settlements, these households could be affected by the land use of the Project, if necessary, precautions are not taken. If river/sea access is blocked due to construction activities, project officials should be contacted via GM. Access will be provided in a way that will not cause any loss of income. Technical and feasible measures will be explored to provide access to fishing areas, and proper passages will be provided to restore access after construction by the Contractor.

Seasonal workers come to Hürriyet and Aşağıburnaz settlement to work for agricultural activities. The approximate number of workers coming from Syria, Diyarbakır and Urfa for citrus picking is 2050. While the accommodation area of seasonal agricultural workers in the Hürriyet neighborhood, where 2000 workers come, is not affected by the land use of the project, it is thought that the accommodation area in the Aşağıburnaz settlement, where 50 people come, may be affected (Parcel no: 622/1, 623/30). Seasonal agricultural workers stay in tents. Therefore, their locations may change every year. RP will take measures for seasonal workers staying in tents on the affected lands during construction (for details see Entitlement Matrix in Chapter 8).

7.2 Affected Structures

A detailed asset inventory, including structures on affected lands, will be prepared and finalized based on Appendix 1 prior to the initiation of the valuation and expropriation process. Compliance of compensation paid for structures including buildings with ESS5 will be examined during the implementation phase and at the end of the Project with a third party completion audit. Information about the affected structures was collected in the field study carried out during the RP preparation phase. Accordingly, 8 land owners/users declared that there were houses/dwellings on the affected lands, and 22 land owners/users declared that there were non-residential and non-commercial structures. It was stated that in the scope of HLS, there was a commercial building on one of the lands. In addition, workplaces affected by the project were not included in the household survey and in-depth interviews were conducted. The compensation strategy in RP has been determined in principle according to the declarations here. However, payments to be made from the RP fund will be based on the Asset Inventory prepared as a result of corporate identification studies by PIU following completion of the land valuation process. In close cooperation with DGII's Real Estate and Expropriation Department, the valuation process will be conducted transparently, taking into account the most recent five-year price data obtained from relevant institutions. This approach fully complies with the World Bank's Environmental and Social Framework requirements, ensuring

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fair, transparent, and market-based compensation for all affected assets. Future updates will be incorporated into the RP addendum.

Table 7-7. Structures and buildings on the lands

Answers	No.
There is a residential building (house/dwelling) on the land	8
There is a non-residential and non-commercial structure on the land	22
There is a commercial building on the land	1
No structure	8
Total	35

Source: RP preparation field study - HLS, 2024

7.2.1 Residential buildings (house/dwelling) on the affected lands

There are houses on the lands affected by the project, but since these houses are outside the expropriation boundary, there is no physical resettlement impact.

7.2.2 Non-residential and non-commercial structures on the affected lands

A list of affected structures on the lands and information on the valuation method were not provided. This information will be provided after the land valuation process is completed. All structures in the affected lands were identified with the household representatives surveyed within the scope of the RP preparation field study and the following list was prepared. The PIU will check through the corporate identification study further detail the list and verify whether this covers all the structures affected by the land acquisition of the project and, if so, whether they are compensated.

Table 7-8. Identified structures on the affected lands by declaration

Structure	Location	Parcel	Age	Material
Irrigation system	Aşağıburnaz	626/57	No answer	Plastic
Irrigation system	Aşağıburnaz	631/6	5	Plastic
Irrigation system	Aşağıburnaz	626/56	20	Plastic
Irrigation system	Aşağıburnaz	631/14	10	Plastic
Irrigation system	Aşağıburnaz	626/54	12	Plastic
Irrigation system	Aşağıburnaz	631/14	10	Plastic
Well	Aşağıburnaz	623/1	24	Concrete
Irrigation system	Aşağıburnaz	631/14	No answer	Plastic
Irrigation system	Aşağıburnaz	626/59	No answer	Plastic
Irrigation system	Aşağıburnaz	626/59	No answer	Plastic
Irrigation system	Aşağıburnaz	631/14	25	Plastic
Irrigation system	Aşağıburnaz	622/1	20	Plastic
Barn	Yukarıburnaz	585/102	30	Brick
Well	Yukarıburnaz	592/1	No answer	Plastic
Barrack	Yukarıburnaz	592/1	No answer	No answer
Barn, sheep pen, poultry house	Yukarıburnaz	586/4	No answer	No answer
Barn	Yukarıburnaz	586/2	38	Brick
Barn	Yukarıburnaz	585/105	20	Brick
Structure	Hürriyet	639/478	No answer	No answer
Irrigation system	Hürriyet	639/479	24	Plastic

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Structure	Location	Parcel	Age	Material
Irrigation system	Hürriyet	639/472	No answer	Plastic
Irrigation system	Hürriyet	639/475	No answer	Plastic
Irrigation pool	Hürriyet	639/475	60	Stone
Storage	Hürriyet	646/2	40	Brick
Irrigation system	Hürriyet	639/481	No answer	Plastic
Irrigation system	Hürriyet	647/7	No answer	Plastic
Irrigation system	Hürriyet	647/2	No answer	Plastic
Irrigation system	Hürriyet	639/465	No answer	Plastic
Irrigation system	Hürriyet	645/1	No answer	Plastic
Irrigation pump owned by the Municipality	Turunçlu	957/12	No answer	Concrete
Well	Turunçlu	958/16	No answer	Concrete
Well	Turunçlu	958/28	No answer	No answer

Source: RP preparation field study - HLS, 2024

7.3 Commercial facilities to be relocated

Four lands belonging to Toros A.Ş. will be affected by the land acquisition of the project. Two of them are not used. Two lands are used for commercial purposes (0/946, 0/1428). In addition, there is a public land used for commercial purposes (0/1792).

7.3.1 Süper Enerji to be relocated

Süper Enerji 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 the project.

The company is located in an area of 56 acres performing packaging and market distribution activities for coal transported by sea to Türkiye from abroad. The company has five branches throughout Türkiye. Süper Enerji uses the facility on parcel 0/946 owned by Toros A.Ş. and public parcel number 0/1792.

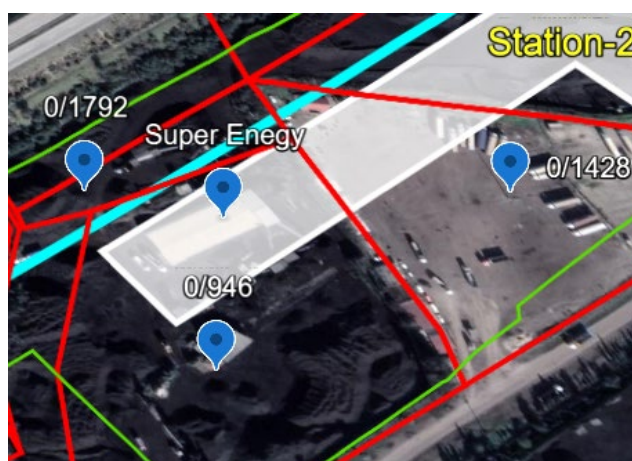


Figure 5 Location of Süper Enerji (0/1792 and 0/946)

In 2024, Süper Enerji representative has been contacted again, and the below information was confirmed. The company will continue to use the parcels until the implementation of RP.

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

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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 7-9. Personnel of Süper Enerji

Personnel	Number
Operations Manager	1
Deputy Operations Manager	1
Secretary	1
Foreman	1
Unskilled Worker	26
Total	30
Seasonal Workers (app.)	10
Grand Total	40

Source: RP 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 Sarımaşı and Dörtöl. 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 representing the business owner. He 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 the 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)

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- 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 the 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 6.

- 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 Süper Enerji was the use of public land next to the area where the station will be built (See Figure 6). This issue was discussed with DGII officials, but it was learned that such a revision was not possible due to the BOTAŞ pipeline.



Figure 6. Empty Public Land Between Free Zone Highway Connection and Süper Enerji

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In addition, there may be some business 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. The 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 Süper Enerji's business 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 Toros port, which belongs to Toros Tarım. Süper Enerji's relocation from the port and ending its operations would also cause Toros Tarım to experience loss of income as well.

7.3.2 Relocation of Parking Areas

During project design efforts were made to minimize 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. in Osmaniye OIZ and a logistic parking area in the Toros A.Ş. in Adana Ceyhan Sarımsazı (Parcel No. 0/1428) will be relocated.

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 RP. If final design concludes that the parking area of Toros Inc. will be used for the location of the station, 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.

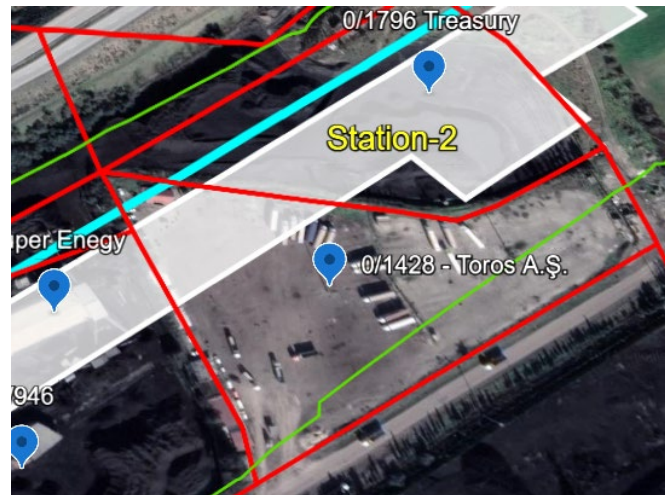


Figure 7 Track parking area of Toros A.Ş. (0/1428)

7.4 Communal Facilities to be affected

The Project's land acquisition will not adversely affect communal facilities. Unused facilities of Adana Water and Sewerage Administration (ASKİ) exist on parcel 958/26 in Ceyhan, Adana. Following official correspondence, the finalized project design formally submitted to ASKİ. If

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necessary, these facilities will be relocated or removed by mutual agreement. Any impacts identified during implementation will be assessed and included in an addendum to the RP.

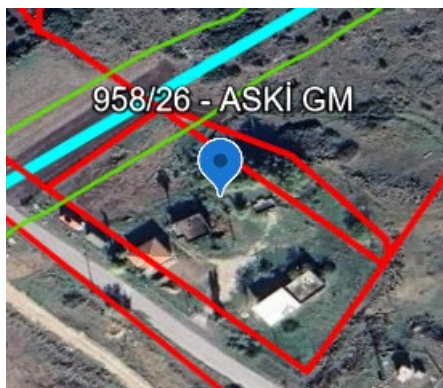


Figure 8. Facility of ASKİ on an affected land

8 RESETTLEMENT AND COMPENSATION STRATEGY

The resettlement strategy of the project stands on three legs. Accordingly, Entitlement Matrix (8.1.) is supported by the following tools:

- Livelihood restoration measures (8.2.)
- Vulnerability assistance (8.3.)
- Other mitigation measures (8.2.3.)



Figure 9 Resettlement and compensation strategy

The Entitlement Matrix (EM) presented in this section provides an overview of all rights within the scope of RP. The project will try to minimize involuntary resettlement and improve or at least restore livelihoods and living standards of displaced persons. The design of the project has been finalized. However, if there is a need for new land after the contractor is selected, compensation will be provided according to the EM of this RP. If an unforeseen effect is encountered in the EM as a result of land acquisition an addendum will be prepared for this RP.

The impacts of the project on some Project-Affected Persons (PAPs) are greater than on others. These include: (i) vulnerable groups, such as female-headed households, the elderly, and persons with disabilities who are affected by land acquisition; and (ii) significantly affected persons, including those who lose more than 10% of their total landholdings, those whose parcels have previously been affected by other projects (i.e., subject to multiple project impacts), and landless users of public (Treasury) lands.

Vulnerability assistance will be provided to support the specific needs of vulnerable PAPs—such as facilitating transport access for the elderly or ensuring continued access to agricultural land—while livelihood restoration measures will be offered to those significantly affected, to help restore income and living standards.

Additionally, components such as access roads, construction sites, and storage areas are currently outside the scope of this Resettlement Plan (RP), as their exact locations have not yet been determined. Once these locations are finalized, the impacts on PAPs will be assessed, and any resulting resettlement or livelihood impacts will be addressed through a dedicated addendum to the RP, ensuring that all applicable mitigation measures, including

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those for vulnerable and significantly affected groups, are applied in line with the principles and entitlements outlined herein.

8.1 Entitlement Matrix

Compensation for parties affected by the project will be based on transparent, consistent and fair compensation measures. The entitlements defined under this RP will comply with local legislation and ESS5.

There are different types of rights holders who are affected by land acquisition in different ways. The entitlement matrix offers compensation measures to persons affected by the project in various ways, and compensate for a range of losses including adverse livelihood impact. Other groups affected by 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 commitments.

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 DGII, not by the affected people.

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Table 8-1 Entitlement Matrix

No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
1. Land related buildings/businesses					
1.1	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 debris and without depreciation deductions).	Compensation will be paid from RP Fund. However, the full replacement cost that the legal legislation does not cover will be provided by the RP-fund provided by DGII. Depreciation and debris costs will not be deducted. If it is done, it will be updated according to the Consumer Price Index (CPI) in the RP fund and returned to the owners.
				Before the building is demolished, households have the right to use all recovered materials, including, but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their homes.	During the expropriation process, DGII 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
				Transport expenses are covered, or transportation support is given.	Moving allowance and transitional livelihood support (depending on the vulnerability and significance score income support benefit package or employment opportunity or other outreach mechanisms provided by the municipality and/or other institutions). For details see Section 8.2. Livelihood Restoration Measures.
				Transaction costs and legal fees associated with the land acquisition process will be paid to the right holder. Any deductions such as depreciation and debris costs will be refunded to the owners.	Assistance in finding new housing and moving allowance to physically displaced PAPs including tenants. Compensation to ensure that tenants are not harmed in the event of lease termination early.
				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.	Transitional Livelihood Support (TLS) will be provided to the house owners according to vulnerability and significance score (for calculation methodology see Appendix 2).
		0	Persons who are formal permanent residents		DGII Expropriation Department will ensure households can access and recover these materials before demolition.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				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.	DGII will negotiate with landowners/users and provide necessary material support for rebuilding nearby.
				Transport expenses are covered, or transportation support is given.	DGII will arrange and cover transport expenses or provide transport support during relocation.
				Users will be informed five months before construction to ensure they can find another accommodation. Besides, assistance to find proper accommodation will be provided by DGII.	DGII will notify users in advance and support them in finding alternative accommodation.
				Transaction costs and legal fees associated with the land acquisition process will be paid to the right holder.	DGII will cover all transaction and legal costs related to the land acquisition process for the right holders.
1.2	Loss of other immovable/buildings related to livelihood activities	Unknown	Formal owners of structures used permanently or periodically	Payment at replacement cost (payment of the expropriation compensation to the beneficiary, including debris and without deduction for depreciation.	Compensation will be paid from RP Fund. However, the full replacement cost not covered by legal legislation will be provided by the RP-fund by DGII.
				Households have the right to use all of the recovered materials.	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.
				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	DGII will provide support for transport and labor to relocate structures as requested by the users, ensuring smooth relocation.
				Compensation for informal assets	Compensation for informal assets is covered according to Article 19 of the Expropriation Law. If compensation cannot be provided from the RP Fund to informal users whose ownership ties cannot be proven with official documents, compensation will be paid from the RP-LRP Fund.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
1.3	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 A.Ş.)	Cash compensation at full replacement cost (including expropriation compensation, debris and without deduction for depreciation) is paid.	Compensation will be paid from RP Fund of DGII. However, full replacement cost is not covered by the legal provisions, so the discrepancy will be provided by the RP fund provided by DGII. Although the national valuation of land complies with ESS5, the same does not apply to fixed assets. Some expenses and deductions made in the compensation calculated for buildings, structures and trees are not in compliance with ESS5 (such as depreciation, debris cost, wood cutting expenses). Outstanding full replacement costs (top-up payments) will be provided by the RP Fund.
				Before the building is demolished, owners have the right to use all recovered materials, including but not limited to, windows, doors, kitchens, bathrooms, metal parts, woods in their structures.	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.
				The delivery of the materials to the user (Süper Enerji) is under the initiative of Toros Tarım. In such a situation, the transport of materials will be supported.	Transport of materials will be supported when delivery is initiated by Toros Tarım, ensuring that users are not burdened with transport costs. In such cases, full support for the transportation of recovered materials will be provided to facilitate the process.
		1 logistic parking area	Toros A.Ş.	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.	DGII 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 porters' lodge in the parking area that may be required.
		Süper Enerji Inc. Co. (Tenant of Toros Tarım A.Ş.)	User of the structures under relocation impact, 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.	Through the RP fund, DGII is committed to compensate the losses of businesses caused by the need to relocate, in order to achieve the objectives, set out in ESS5. As a public institution, DGII will provide additional support by cooperating with other public institutions such as the District Government, Municipality, Ministry of Finance (for Treasury lands). Possible replacement costs will be considered (See Appendix 6).

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				- 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 for a period of up to six 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, and 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 at full capacity.	
		30 people (Süper Enerji)	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, DGII 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.	Through its RP fund, DGII is committed to compensating the losses of businesses caused by the need to physical resettlement, as specified in the RP, in order to achieve the objectives, set out in ESS5. As a public institution, DGII will provide additional support by using all facilities of public institutions.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
2.Structures/Trees and Cultivated Crops					
2.1	Loss of agricultural lands / Loss of land-based livelihoods / Lands that are divided into more than one part due to land acquisition have unviable parts	465 shareholders	Non-user owners / shareholders	- Cash compensation (including debris 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 law¹⁵.	Compensation will be paid from the RP Fund of DGII. However, full replacement cost that are not covered by legal provisions will be provided by the RP-fund provided by DGII.
		33 owner users	Owners/shareholders who are users of the land	- Cash compensation 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. - Compensation is paid to the user after valuation of the products and trees on the land by the Commission. - Agricultural trainings 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.	Compensation will be paid from the RP Fund of DGII. However, full replacement cost will not be covered by that the legal provisions and the remaining compensation will be provided by the RP-fund provided by DGII. <i>Unviable lands:</i> In case the remaining lands are "unviable", DGII 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. If the land parcel remaining after partial expropriation of land is not economically usable, an application for expropriation of the remaining property must be made within thirty days after the submission of a written notice without the need to file a lawsuit in the administrative court according to the Expropriation Law, Article 12, (pr.7). 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 DGII will ensure that these people have been provided with employment opportunities in the Project. <i>Harms and damages:</i>

¹⁵ 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).

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
	Loss of crops and trees				The contractor is responsible for compensating for any damages (including dust impact) to products and assets that occur outside the construction zone due to construction activities. Cash compensation at market value of annual crops to crop owner determined by MoAF will be paid. Compensation for damages to buildings/structures will be calculated by experts according to the cost tables of the Ministry of Environment, Urbanization and Climate Change.
		20	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.
		1000 (Approximate number) *Total number of crops and trees will be determined by AYGM Department of Real Estate and Expropriation.	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.)	The value of the product (market price) and the amount of investment made for the product (input, labor, age of trees). The construction calendar will be shared with the mukhtars and PAPs of the affected settlement by the Contractor, so that the farmers can harvest their crops. If there is standing crop on expropriated lands just before the construction activities and the construction cannot wait for certain reasons, the cost of the crops will be paid to the user by the Project. Crop owner allowed harvesting their standing crops prior to Contractor's entry into land plot. If harvest is not possible due to the urgency of construction activities, cash compensation at market value of annual crops to crop owner including informal land users determined by MoAF will be paid by updating. 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. 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.)

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
					The compensation paid for trees will be in line with the market price. Compensation paid for trees will include felling cost/wood cost; there will be no deductions. Missing payments, if any, will be covered by the RP fund. Those who want to move their trees to another land will be given time. No cutting cost/wood cost is deducted from the compensation paid for trees. If such deductions were made according to land valuation reports, the deductions will be refunded to the tree owners from the RP fund.
15		16 people	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 the 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.).	The value of the product (market price) and the amount of investment made for the product (input, labor, age of trees). 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. Compensation is already provided for 1 trees according to Article 19 of the Expropriation Law. If compensation cannot be provided from the RP Fund to informal users whose ownership ties cannot be proven with official documents, compensation will be paid from the RP-LRP Fund. No cutting cost/wood cost is deducted from the compensation paid for trees. If such deductions were made according to land valuation reports, the deductions will be refunded to the tree owners from the RP fund.
2.Community and Public Resource Impacts					
	Loss of accommodati on area	2050 people in two settlements parcels(orchards) ¹⁶	Seasonal workers including Syrians	Supporting agricultural activities and protecting agricultural infrastructure will prevent the reduction of income sources of seasonal agricultural workers, including Syrians, as well as farmers.	DGII will cooperate with other public institutions for the protection of agricultural activity such as Provincial / District Directorate of Agriculture and Forestry and cooperatives in the region, Seasonal

¹⁶ 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.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				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 DGII - 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 The deterioration that has occurred or is likely to occur in seasonal workers' housing conditions will be eliminated. Housing areas and alternatives will be evaluated by the Contractor.	Agricultural Workers Solidarity Association, Erzin Chamber of Agriculture and Erzin Agriculture and Forestry district directorate. If the accommodation areas of seasonal workers will be affected by the project, they will be provided to establish shelters in the existing alternative areas. The alternative area should be sufficient in terms of toilet, drinking and utility water and electricity facilities.
	Loss of common property areas / Loss of access to pasturelands	In Yukarıburnaz village 113 households	Users of pasturelands	Technical and feasible measures will be implemented to ensure access to pasture areas is maintained or restored after construction, including providing proper passageways.	The Contractor is responsible for implementing technical and feasible measures to maintain or restore access to pasturelands after construction, including building or rehabilitating safe and proper passages.
				Community-level support will be provided specifically to pasture users in the Yukarıburnaz settlement.	DGII will coordinate with the Ministry of Agriculture and Forestry (MoAF) to develop and implement a pasture improvement project as part of livelihood restoration measures targeting pasture users in Yukarıburnaz.
				If access to pasture lands is restricted during construction, land users whose livelihoods depend heavily on livestock and pasture use will receive feed support during the restricted period. This support may include direct provision and distribution of fodder in cooperation with cooperatives and relevant institutions.	DGII and the Contractor will work with local cooperatives and relevant institutions to provide direct feed support and distribute fodder to livestock-dependent land users during periods when pasture access is restricted.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
				If pasture access is maintained through safe and healthy passage gaps, no additional compensation will be provided to herders. However, if access to the land cannot be ensured and this situation poses health or safety risks to humans or animals, feed support will be granted	Compensation is not due if pasture access remains open and safe. However, DGII will ensure partial feed support is provided if access is limited or unsafe for humans or animals.
				Any animal losses caused by construction activities will be compensated by the Contractor.	The Contractor is liable to compensate for any animal losses directly caused by construction activities
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.	DGII 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.
21	Significant impact on total land holdings of the farmers	16 PAPs (see Table 5-1)	PAPs whose total land holding are affected by the Project more than 10%	These people are paid compensation at the full replacement costs; they can buy new ones to replace the lost land. Acquisition of new land will be supported by the expropriation cost of these PAPs. However, they may need time to find new land and start using it for agricultural purposes. For this reason, the household will be entitled to receive TLS. Temporary or permanent employment opportunities, especially cleaning, chauffeur, security, cookery etc. during the construction and operation period will be offered to PAPs. Agricultural training for farmers.	The household will be entitled to receive TLS according to their vulnerability and significance score (Appendix 2) in the scope of livelihood restoration. PAH members will have priority in local employment and training. DGII and project implementers will ensure prompt and full payment of compensation at replacement cost, so PAPs can secure new agricultural land without undue delay. TLS programs will be effectively designed and delivered to support affected households during the transition period until new land is fully productive, including income support, food security assistance, or alternative livelihood options.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
					Agricultural trainings will be organized in cooperation with relevant agricultural institutions and extension services, tailored to the needs of PAPs to help them adopt modern and sustainable farming practices on their new land. Continuous monitoring and feedback mechanisms will be established to ensure that PAPs are adequately supported during the transition, and that employment and training programs meet their needs effectively.
4.Livelihoods, Vulnerable Groups, Quality of Life					
4.1	Vulnerable groups	40	Vulnerable PAPs - Elderly people (4 person) - Persons with disabilities (4 person) - Unemployed (6 person) - Women who have lost husband/divorced (6 person) - Home-bound due to chronic illness (1 person)	Temporary or permanent employment opportunities, especially cleaning, driver, security, cook, etc. during the construction.	Special priority and reasonable accommodations will be given to vulnerable PAPs such as elderly, persons with disabilities, unemployed, women-headed households (widows/divorced), home-bound due to illness, earthquake victims, and illiterate adults to access employment opportunities. Vulnerable groups will be prioritized for employment and/or livelihood restoration opportunities. Employment conditions will consider their physical and social limitations.
				Priority in livelihood restoration measures.	Livelihood restoration programs will be adapted for vulnerable PAPs, providing increased support proportional to their vulnerability and significance scores (see Appendix 2). For example, additional financial aid, skills training, or social services access.
				Simplified access to information and grievance mechanisms (e.g., audio-visual formats for illiterate adults)	Communication will be adapted to meet the needs of vulnerable groups, including audio-visual materials, local language, or personal assistance to ensure full understanding and participation in grievance procedures and project information sharing.

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
			- Earthquake victims (11 person) - Illiterate adults (8 people)	In cases of project-related displacement or resettlement, entitlement to Transitional Livelihood Support (TLS) based on vulnerability and significance score, plus moving allowance.	TLS packages will be designed to accommodate specific vulnerabilities, such as mobility support for the elderly or disabled, and targeted assistance for earthquake victims. Additional legal and social support will be offered to facilitate smooth transition.
				Coordination with local stakeholders (e.g., Social Assistance and Solidarity Foundation, Municipal Social Services, NGOs, Chambers of Agriculture) to ensure continued support beyond project duration.	DGII and project implementers will collaborate closely with local social services and NGOs to provide ongoing support tailored to vulnerable groups' needs, ensuring long-term livelihood sustainability and social protection.
5. Temporary Use of Land					
5.1	Temporary Land Use	NA	In case of temporary land need of the project, the owner of the rented land	Market rental price to be paid for the lease term with a protocol. The temporarily used land will be returned to its former state, and a land exit protocol will be signed.	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 use period starts with the land entry protocol (See Appendix 4) 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 the parcel returned to the landowner. It is recorded with the land exit protocol (See Appendix 5), which includes the signature of the landowner and the Contractor and shows the soil is reinstated and delivered properly.

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8.1.1 Protection Against Inflation

In recent years, there has been a high inflation problem in Türkiye. Compensations paid with Expropriation for lands and fixed assets on the lands are already updated against inflation by the Court in the Article 10 cases. Additional payments to be made from the RP fund will be updated according to the Consumer Price Index (CPI) with the Monetary Values Update Tool of the Turkish Statistical Institute (TurkStat) and paid to the PAPs by PIU. RP-fund payments will be updated quarterly until payment is made. If the current price is not paid within three months, the price will be updated again.

8.1.2 Protection Against Inflation

In recent years, there has been a high inflation problem in Türkiye. Compensations paid with Expropriation for lands and fixed assets on the lands are already updated against inflation by the Court in the Article 10 cases. Additional payments to be made from the RP fund will be updated according to the Consumer Price Index (CPI) with the Monetary Values Update Tool of the Turkish Statistical Institute (TurkStat) and paid to the PAPs by PIU. RP-fund payments will be updated quarterly until payment is made. If the current price is not paid within three months, the price will be updated again.

8.2 Livelihood Restoration Measures

There are people who may be more affected by economic displacement. EM adopts various principles for these PAPs who are determined within the scope of RP. The groups of PAPs listed below considered “Significantly Affected People” and will receive additional supports.

- Physical displaced PAHs,
- Landless informal users of impacted public lands,
- PAPs whose total land holding are affected by the Project more than 10%,
- Housing conditions of affected seasonal workers,
- Members of Yukarıburnaz settlement where pastures are affected by the Project.

8.2.1 Livelihood restoration instruments

Transitional Livelihood Support (TLS)

Transitional Livelihood Support (TLS) is established to assist households in maintaining their livelihood during periods of change. The amount of TLS, which matches the monthly net minimum wage, will be distributed from the RP fund to assist the PAPs affected by the land acquisition of the project. The minimum wage is fixed at 26.005,50 TRY (739 USD) according to the Official Gazette dated December 27,2024. TLS amounts to be paid to eligible individuals within the scope of Livelihood restoration are calculated according to the vulnerability and significance score (Appendix 2).

DGII has gained experience in international standards by carrying out many IFI-supported projects in the last five years. DGII officials want to determine a fair management principle by using common methods in RP applications in various regions of Türkiye. Therefore, the Vulnerability Assessment in Appendix 2 will be used in calculating livelihood supports.

Local Employment

Employing local residents is a key mitigation strategy outlined in ESIA of the Project. Furthermore, a special emphasis will be placed on providing employment opportunities to PAPs and members of PAHs which are directly impacted by the Project's land acquisition. The

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application forms for jobs will include the question, "Were your house and lands directly affected by the land acquisition of the Project?".

To ensure the provision of either temporary or permanent job opportunities, a preference for hiring local and displaced individuals will be mandated in agreements with the Contractor will guarantee that these individuals are offered employment within the Project.

Trainings

The main purpose of agricultural trainings is to help the PAPs impacted by the land acquisition of the project increase the productivity of their existing lands. Enabling farmers whose lands are partially affected by the Project to use their remaining land more efficiently will reduce the adverse impact of the Project on livelihood.

At least one agricultural training will be planned in each PAH according to the demands of PAPs. The activity will be announced on the Project's website and PAPs will be invited directly or through the mukhtars by CLO. Training subjects can include, but are not limited to;

- Efficient use of resources
- Productivity increasing agricultural techniques
- Sustainability practices
- Climate change
- Development of alternative agricultural activities
- Trainings to increase product diversity

Pasture Improvement Project

Besides the above household and PAP-based activities, community level activity is also planned. If the pastures, which are the source of livelihood of the villagers, narrowed due to the Project and livestock activities are adversely affected, pasture improvement projects will be carried out together with the Directorates of Agriculture and Forestry to improve the quality of the remaining part of the affected pasture or to develop alternative pastures. The fact that the pasture in Yukarıburnaz settlement is affected by the Station 2 area is an example of this situation.

8.2.2 Livelihood restoration programme

The program to be followed for the significantly affected people listed above and the tools that will be used to minimize the livelihood losses of households is presented below.

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Table 8-2. Livelihood restoration programme

PAP Category	Type of LRP instrument	Implementation	Time
Landless informal users of impacted public lands	- TLS - Local employment - Agricultural trainings	The household will be entitled to receive TLS according to its vulnerability and significance score (Appendix 2). PAH members will have priority in local employment and training. PAP's GM application will be received, evaluated and TLS payment will be made to his/her bank account one time for one household.	After land acquisition
PAPs whose total land holding are affected by the Project more than 10%	- TLS - Local employment - Agricultural trainings	These people are paid compensation at the full replacement costs, they can buy new ones to replace the lost land. Acquisition of new land will be supported by the expropriation cost of these PAPs. However, they may need time to find new land and start using it for agricultural purposes. For this reason, the household will be entitled to receive TLS according to its vulnerability and significance score. PAH members will have priority in local employment and training. PAP's GM application will be received, evaluated and TLS payment will be made to his/her bank account one time for one household.	After land acquisition
Housing conditions affected seasonal workers	Improvement of housing conditions	The deterioration that has occurred or is likely to occur in seasonal workers' housing conditions will be eliminated. Housing areas and alternatives will be evaluated by the AYGM PIU.	Before and during construction
Members of Yukarıburnaz settlement where pastures are affected by the Project	- Pasture improvement projects - Local employment	Pasture improvement projects will be carried out together with the Directorates of Agriculture and Forestry to improve the quality of the remaining part of the affected pasture or to develop alternative pastures.	During construction

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8.3 Other Mitigation Measures

8.3.1 Protective and supportive measures for agricultural activities

The region is very productive in terms of olive and citrus production. A careful approach to agricultural activities 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-Dörtöl Plain 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, 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 damage to irrigation canals built by DSI. A hitch in irrigation canals can affect a wider area than affected parcels. Therefore, during the design phase, DGII 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 DGII.
- The 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. It will be verified whether the Association covers all seasonal workers, incl. those of non-Turkish origin

8.3.2 Minimizing the impacts on Yukarıburnaz village

Many households in Yukarıburnaz village are engaged in animal husbandry which is an important source of livelihood. Two railway lines that will be constructed are 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 were discussed.

It is highly likely that the project will result in limiting the access to pasture lands and to change the traditional use patterns of the community also impacting the daily operation of animal husbandry activities. Therefore, developing a pasture improvement project with relevant institutions for Yukarıburnaz village is important. It will be implemented under the leadership

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of AYGM PIU, in coordination with relevant authorities such as municipalities, the Provincial Directorate of Agriculture and Forestry, and other necessary institutions.

Additionally, employment opportunities under the project will prioritize these PAPs of working age living in Yukarıburnaz village.

8.3.3 Construction Calendar Information

The construction calendar will be shared with the mukhtars and PAPs of the affected settlement by the Contractor, so that the farmers can harvest their crops. If there is standing crop on expropriated lands just before the construction activities and the construction cannot wait for certain reasons, the cost of the crops will be paid to the user by the Project.

Crop owner allowed harvesting their standing crops prior to Contractor's entry into land plot. If harvest is not possible due to the urgency of construction activities, cash compensation at market value of annual crops to crop owner including informal land users determined by MoAF will be paid by updating.

8.4 Vulnerability Assurances

Vulnerable groups include people disadvantaged by race, colour, gender, health, language, religion, political or other opinion, national or social origin, property. Birth, or other status. What distinguishes them from other people affected by the Project land acquisition is that they need to be supported when undergoing the expropriation processes, as they need the support of others in other daily duties/routines because of physical (disability), social (gender) or economic (poverty, landless) disadvantages. Vulnerable groups taken into account are:

- Woman head of household,
- Elderly people in need of care and social assistance,
- Disabilities (Mental and Physical),
- Unemployed (looking for a job),
- Women who have lost their husbands/divorced,
- Home-bound due to chronic illness,
- Illiterate adult,
- Refugee/migrant,
- Earthquake victim,
- Seasonal agricultural workers.

Vulnerable people may face various challenges in accessing the opportunities provided under the Environmental and Social Management Plans. These may include difficulties in participating in stakeholder engagement activities, accessing the grievance mechanism, receiving compensation or crop payments, and benefiting from livelihood restoration measures.

8.4.1 Identified Vulnerable PAPs

According to the answers given by household representatives regarding the vulnerability of household members (with more than one answer option), 40 of the 148 household members have vulnerabilities in the project affected households. Distribution of vulnerabilities presented in the table below.

Table 8-3. Distribution of household members by vulnerability per settlements

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Vulnerability	Yukarıburnaz	Aşağıburnaz	Hürriyet	Turunçlu	Total
Elderly people in need of care and social assistance	1	3	0	0	4
Disabilities (Mental and Physical)	0	2	2	0	4
Unemployed (looking for a job)	2	2	2	0	6
Women who have lost their husbands/divorced	2	3	1	0	6
Home-bound due to chronic illness	0	1	0	0	1
Illiterate adult	3	5	0	0	8
Earthquake victim	3	4	0	4	11
Total	11	20	5	4	40

Source: RP preparation household survey, 2024

8.4.2 Vulnerability Assistance

The types of assistance for vulnerable groups are presented in the table below. But the assistance to be provided may not be limited to these. The requests of PAPs are always evaluated by the PIU and can be achieved by evaluating the relation to vulnerability and the project.

Table 8-4. Vulnerability assistances per vulnerable groups

Vulnerability category	Vulnerability Assistance
Woman head of household	Safe stakeholder engagement opportunities will be provided for women. Women CLOs will hold one-to-one meetings with these groups and provide information about the entire project, including land acquisition, community health and safety, and gender aspect. Requests for assistance will be considered to achieve compensation or various supports.
Widowed/divorced women	
Elderly people in need of care and social assistance	It is known that these groups have difficulties in accessing information, compensations, and other supports. Therefore, when they want to reach a service related to the Project directly or indirectly but has difficulty reach it due to their vulnerability; they can request assistance from the local units of the Project. These Vulnerability Assistances include but are not limited to: ■ Reaching the bank. ■ Meeting with the bank. ■ Bank employee home visit. ■ Reaching the notary. ■ Getting information from the notary. ■ Notary employee home visit. ■ Sending and receiving documents (cargo, fax, e-mail, etc.). ■ Signing any document at home. ■ Transportation. ■ Access to information and consultancy. ■ Professional, lawyer, estate agent etc. ■ Utilization in public services. ■ Engagement opportunities at home. Vulnerable PAPs identified in the Census study will be provided with specific information about their entitlements from RP.
Disabled (Physical / Mental)	
Homebound due to Chronic Disease	
Unemployed (although looking for a job)	Local employment opportunities will be provided for unemployed and poor peasants. PAPs who have not worked in an insured job for more than one year will be given priority in local employment.
PAPs who do not have social security	
Illiterate adult	Oral, face-to-face and visual engagement opportunities and translator support will be provided. Consultancy will be provided in line with their demands in accessing social services.

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Vulnerability category	Vulnerability Assistance
Earthquake victim	Oral, face-to-face and visual engagement opportunities. Local employment opportunities will be provided.

PAPs who are entitled to receive transitional livelihood support (TLS) due to significant loss of livelihood will receive an additional vulnerability and significance score if they have the above vulnerabilities (See Appendix 2).

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9 RP BUDGET

The census survey and inventory studies for the Project' affected assets have been conducted (For the Asset Inventory and Census list as a RP implementation table see Appendix 1). 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. During the RP preparation field study, efforts were made to make this Inventory compatible with ESS5. Accordingly, users were identified on the lands, including informal users on public lands. Information was obtained regarding the households' livelihood patterns, total land assets and vulnerabilities. A detailed asset inventory, to be managed by the PIU. including structures on affected lands, will be provided based on Appendix 1 after land valuation process. Monitoring of compliance of compensation paid for structures including buildings with ESS5 will be examined during the implementation phase and third party assessment of RP implementation will be conducted when the RP is fully implemented and all compensations paid. (See Chapter 10). In this context, see Appendix 3 for the approximate RP budget prepared according to predictable expenditure items.

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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 RP 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 are necessary for the measures developed to compensate for the negative impacts caused by land acquisition and for the RP 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 RP implementation. RP implementation monitoring will monitor/document that RP is fully implemented. Following completion of RP implementation there will be an independent assessment of RP which will look into whether RP fulfilled the objective of ensuring that no PAP are worse off after acquisition than before. The main purpose of RP monitoring will be to verify the following questions:

- Are these compensations and measures provided in the RP implemented properly and timely?
- Can the eligible groups receive their full compensation entitlements within the agreed period?
- Can the compensation and measures offered in RP be effective in maintaining or increasing the living standards of PAPs?
- Are the complaints made by PAPs managed and resolved in accordance with the RP and SEP?
- Are measures related to stakeholder engagement and resettlement taken to include vulnerable groups and significantly affected people?
- 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, RP 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 RP 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 groups or communities, and related mitigation actions at the community level, in addition to monitoring and visiting affected lands with PAPs.

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Roles and responsibilities of the units to be authorized in the monitoring and evaluation process are defined in Table 36.

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Table 10-1. Roles of RP Implementation Units and Staff in the M&E Process

Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators for Monitoring
DGII	PIU (Social Expert) & PIU (Community Relations Officer)	Internal Monitoring	- Preparation of M&E reports and submission to Project management and lenders - To follow the land acquisition process in order to compensate for the losses of all PAPs - To ensure that all landowners' (formal and informal) livelihoods are compensated timely and appropriately through the RP Fund - To ensure that all PAPs, especially vulnerable ones, can easily express their concerns that may arise in the RP implementation process and respond to them in time - To ensure that significantly affected people are entitled and supported - 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 RP 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 RP 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 RP implementation on land acquisition and restoration of livelihoods - Number of compensation payments completed - The 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 DGII - Number of stakeholders contacted during the RP 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 and significantly affected people among PAPs

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Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators for 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		
		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 RP commitments and identify problem areas in RP 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 DGII on corrective actions and	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

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Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators for Monitoring
Supervision Consultant	Social Expert		measures to be taken to improve RP implementation		- Percentage of complaints resolved in a timely manner - Number of complaints that cannot be resolved / closed on time - Qualitative feedback from PAPs on RP 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
		Completion Audit	Upon the completion of resettlement activities, performing a RP Completion Audit, preparing the audit report and submitting it to the Project management	At the end of the Project	
		Internal Monitoring	- Preparing monthly reports to the PIU about the compliance of RP 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 RP 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 RP - Developments related to the necessary payment and support process of eligible PAPs - Impact indicators of compensation, support and measures offered in RP 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	

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11 PUBLIC CONSULTATIONS 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 RP 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 RP preparation process and activities that will be performed during RP implementation.

11.1 Consultation Activities Performed under RP Preparation

DGII has consulted and made project revisions to minimize resettlement during the project design phase. Land measurements were made by experts. DGII 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 RP. This analysis is based on consultations with individuals affected by land acquisition, local institutions and organizations in 2020 and 2024 (two RP preparation field studies). 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 conducted with local institution and organization officials.

Stakeholders communicated during the RP studies are:

- Owners and users of the lands affected by the land acquisition of the project in 2024.
- Toros Agriculture Industry and Trade Process and Planning Manager, Operating Manager, Marketing Manager in May 2024.
- Facility Manager of Süper Enerji Coal Storage Facility in May 2024.
- Owner and residences of the houses on the affected lands in March 2024.
- Informal users of public lands in March 2024.

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- Mukhtars of 5 settlements affected by the land acquisition of the project after revision (Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımaşı, Turunçlu) in March 2024.
- Owners and users of the lands affected by the land acquisition of the project in 2020.
- Owner of Süper Enerji Coal Storage Facility (April 2020).
- Facility Manager of Süper Enerji Coal Storage Facility in April 2020.
- Entitled households/persons affected by Erzin Port station revision (March 2020).
- Head of the Chamber of Erzin Chamber of Agriculture (February 2020).
- Facility Manager of Süper Enerji Coal Storage Facility in February 2020.
- Mukhtars of 7 settlements affected by the land acquisition of the project (Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımaşı, Turunçlu, Yeşiltepe, Büyüktüysüz) in February 2020.
- Deputy Manager of the Institution and engineers of Erzin District Directorates of Agriculture and Forestry (January 2020).
- Engineer and Technician Personnel of Osmaniye OIZ (January 2020).
- Deputy Manager of Erzin Yeşilkent Irrigation Cooperative (January 2020).
- Head of the Chamber of Erzin Chamber of Agriculture (January 2020).
- Institution authorities of Erzin Chamber of Industry and Trade (January 2020).
- Toros Agriculture Industry and Trade Process and Planning Manager, Operating Manager, Marketing Manager in January 2020.
- Facility Manager of Süper Enerji Coal Storage Facility in January 2020.
- Community members of Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımaşı, Turunçlu, Yeşiltepe and Büyüktüysüz villages (January 2020).
- Mukhtars of 7 settlements affected by the land acquisition of the project (Aşağıburnaz, Yukarıburnaz, Kurtpınarı, Sarımaşı, Turunçlu, Yeşiltepe, Büyüktüysüz) in January 2020.

11.2 Document Management and Disclosure to PAPs

DGII 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 RP.

This draft RP will be disclosed and consulted with the public, in accordance with WB ESS5 by PIU. Feedback received during this consultation will be integrated into RP and submitted to the World Bank's final approval. After the approval of the World Bank, DGII will publish both Turkish and English versions of the document on its official website, as well as sharing RP with the relevant Ministries, Local Authorities and Institutions. Arabic-language information materials will be prepared, if needed, to ensure inclusive and effective stakeholder engagement. The final RP will also be announced on the World Bank website with a separate link. The World Bank will approve any addition to the RP developed in the later stages of the project; this document will be available on both the DGII and the World Bank website. RP will also be presented to PAPs, especially vulnerable groups and significantly affected people, in public consultation meetings to inform about the project's land-based impacts, legal rights and entitlements, Grievance Mechanism by PIU. The hard copy of the RP will be available in the mukhtarship of the affected settlements.

Guide to Land Acquisition and Compensation (GLAC) will be prepared to include detailed information about entitlements, eligibility criteria, valuation procedures and GM and distributed to PAPs during the engagement activities.

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DGII 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 an 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 DGII.

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 DGII during the land acquisition process.

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12 GRIEVANCE MECHANISM

12.1 Purpose and Scope

The Stakeholder Engagement Plan (SEP) document has been prepared for the management of communication and interaction processes that need to be established during the crediting period among institutions, organizations, and other stakeholders that may be directly and/or indirectly affected by the Project, which is conducted by the Project Owner in collaboration with ÇINAR. Additionally, SEP aims to contribute to minimizing the adverse social impacts of the Project and enhancing its positive effects through the inclusive engagement with stakeholders.

The overall purpose of the SEP is to define a program for stakeholder engagement, including public information and consultations, throughout the Project cycle. One of the important objectives of the SEP is to ensure that appropriate information on E&S risks and impacts is disclosed to stakeholders in a timely, accessible and appropriate manner - and to promote effective and inclusive consultations with them, as well as providing an accessible means for raising issues and grievances.

The Grievance Mechanism (GM) is an important tool of SEP and serves the purpose of addressing environmental and social impact-related complaints, opinions, suggestions, feedback, and questions by covering internal and external stakeholders under separate headings.

The grievance mechanism will be one of the tools to monitor the implementation of the RP. The RP identified the indicators to monitor the effectiveness of the RP 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 RP.

12.2 Roles and Responsibilities

Recording and monitoring of complaints (including environmental issues) will be the primary responsibilities of DGII PIU. At the same time, both DGII 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:

- Telephone (Stakeholders can call DGII on (0312) 203 10 00 and request to speak to contact person:

Contact Phone: 0312 203 10 00 Extension: 3059

Contact e-mail address:

elifnur.kara@uab.gov.tr, igorkem.gokmen@uab.gov.tr, hazal.babur@uab.gov.tr

Contact persons: Elifnur Kara, İbrahim Gökem Gökmen, Hazal Babur

- Face to face (Stakeholders can voice their grievance to assigned personnel of DGII at local office)

Complaint register form (CRF) (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances) (see Appendix-1 of SEP).

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DGII also has the "ALO 123 REQUEST FORM" web application. Through this application, all stakeholders can submit their requests and notifications to DGII: <https://www.uab.gov.tr/cagri-merkezi>

- Presidency's Communication Center (CİMER)
- Foreigners Communication Center (YİMER) For details see SEP document.¹⁷

The primary avenue for submitting any form of feedback or complaint will be through the Project-level Grievance Mechanism (GM). The GM process will be overseen by key personnel, including social and environmental specialists as well as Community Liaison Officers (CLOs). The core responsibility of the CLOs will involve collecting submissions from stakeholders directly in the field.

12.3 Principles of Grievance Mechanism

To ensure stakeholders are informed about this process and can readily express their concerns, contact information will be made available through the Project's website, public information meetings, consultation sessions, and Project brochures. These efforts aim to raise awareness and promote transparency regarding how stakeholders can formally voice their grievances. Various formal channels for stakeholders to lodge their grievances include:

- Phone line
- E-mail
- Face-to-face
- Grievance registration form
- Online application

According to SEP of the project, any form of feedback or complaint will be through the Project-specific Grievance Mechanism (GM). The GM process will be overseen by key personnel, including social and environmental specialists as well as Community Liaison Officers (CLOs). The core responsibility of the CLOs will involve collecting submissions from stakeholders directly in the field.

To ensure a gender-sensitive approach, a female CLO will be assigned to facilitate more comfortable interactions with local women. Both male and female CLOs will be stationed within the local area throughout the pre-construction and construction phases. They will be based in a Public Relations (PR) Office strategically located as close as possible to the settlements. Additionally, CLOs will have the mobility to reach vulnerable groups and attend on-site viewings as required. The address of the PR Office and the contact information for the CLOs will be widely publicized in common areas for easy access.

In summary, primary interactions with stakeholders will be carried out by CLOs in the field, although other recommended communication methods will also be available. In cases where language barriers exist, CLOs will be proficient in using local languages such as Arabic, given the presence of a refugee population in the region.

One significant role of the CLOs is to inform complainants about the existence of legal recourse outside the Project-specific GM. If complainants prefer to seek resolution through legal institutions like the courts, CLOs will guide them through the process until their grievance is addressed. Recording and follow up of grievances (including environmental issues) will be the primary responsibilities of the DGII PIU. DGII PIU will have personnel assigned for the grievance management process both on site and at Headquarters. As defined in Roles and Responsibilities (Section 6), Social Specialist and Community Liaison Officer (CLO) at DGII

¹⁷ <https://aygm.uab.gov.tr/uploads/pages/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gel-pkp-cukurova-revised-14052020-clean-5ec5a349bd8dc.pdf>

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PIU will be primarily responsible for grievance management as well as the Supervision Consultant Social Expert and Contractors' Social experts. DGII will regulate the contractual agreements with Contractor to ensure that they have a CLO on site who will be responsible for recording and follow up of grievances on site office. These assigned staff will follow the Grievance Mechanism established to record and resolve all complaints from the stakeholders and follow corrective actions taken. Contact information will be provided via Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for stakeholders have been provided above.

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13 IMPLEMENTATION OF RP

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 RP implementation are summarized in Table 37.

Table 13-1. RP Implementation Activities

Implementation Issue	Implementation Activities
Public information, consultation and participation	All affected people will be provided with timely and relevant information and will be consulted on resettlement/compensation options, and opportunities to participate in planning, implementation and monitoring processes. Participation means the import of complaints, demands and information received from the public and development of social and environmental principles.
Establishing a grievance mechanism	Appropriate and accessible grievance mechanisms 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 RP, Stakeholder Engagement Plan, Workforce Management Plan, Site Management Plan, and Emergency Action Plan will be taken as guides while preparing contracts.
Eligibility and entitlement to compensation and support	Necessary compensation and measures will be applied to the groups in the RP Entitlement Matrix with livelihood restoration measures; not only legal owners, but also traditional landowners without title deeds, formal/informal users, beneficiaries of forest and pasturelands.
Evaluation of replacement value / cost for immovable properties	Compensation will be calculated from the full replacement cost. The valuation will be carried out properly ensuring that the affected person obtains equivalent substitution assets. Depreciation will not be deducted from the calculation.
Obtaining 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

DGII 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 RP. RP implementation activities will be carried out by the PIU of DGII. PIU will include experts who are experienced and competent in the implementation of RP. DGII 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 38, shows the distribution of roles and responsibilities for RP implementation.

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Table 13-2 Roles and Responsibilities in RP Implementation

Unit	Responsibility
Expropriation Department of DGII	- Communicates with land owners / users to inform them about their rights and land acquisition process. - Identifies lands, owners, assets to be expropriated. - Valuation of the impacted assets and providing expropriation compensation. - Providing top-up payments in EM and a budget for livelihood restoration payments. - Manages and executes all transactions related to land acquisition in accordance with Turkish legislation. - Provides regular land acquisition process information to DGII PIU, including complaints and meeting records in negotiation meetings. Carries out the organizational and institutional consultations required for the fulfillment of the RP commitments.
DGII PIU (Social Expert)	- 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. - Preparing GLAC and distribute it in the settlements to the PAPs - Identifies formal / informal land users and assets and vulnerable and significantly affected groups on the affected lands - Identify compensation not in compliance with ESS5 and identify eligible PAPs. - 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 RP entitlement applications / complaints / requests. - Monitors and reports the progress made regarding the commitments defined in the RP. - Determines whether other actions are necessary to achieve RP implementation objectives. - Examines whether the RP 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.
DGII (Community Relations Officer)	- 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 RP 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
Supervision Consultant (Social Expert)	Monitors and reports the progress made regarding the commitments defined in the RP.

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Unit	Responsibility
	▪ Reviews internal monitoring activities, records and reports and proposes solutions to verify compliance with RP commitments and identify problem areas in RP 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.

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APPENDIX 1. ASSET INVENTORY AND CENSUS (IMPLEMENTATION SUMMARY)

Provided as a separate excel sheet.

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APPENDIX 2. VULNERABILITY AND SIGNIFICANCE SCORING METHODOLOGY FOR TLS PAYMENTS

VULNERABILITY AND SIGNIFICANCE SCORING FOR TLS PAYMENTS

Table 40 includes vulnerability and significance scoring as well as livelihood restoration measures. The TLS amounts to be paid according to the score calculated in the light of this information are presented in Table 39.

Table 0-1 TLS Calculation Chart (TLS Hesaplama Tablosu)

Vulnerability and significance score (Hassasiyet Puanı)	TLS
15-20 score	1 month TLS
25-30 score	2 month TLS
35-40 score	3 month TLS
45-50 score	4 month TLS
55-60 score	5 month TLS
65-70 score	6 month TLS
75-80 score	7 month TLS
85-90 score	8 month TLS
95-100 score	9 month TLS
105-110 score	10 month TLS
115-120 score	11 month TLS
125-130 score	12 month TLS

Table 0-2 Vulnerability and Significancy Scoring Chart (Hassasiyet Puanlama Tablosu)

Category <i>Kategoriler</i>	Score <i>Puan</i>	Entitlements <i>Haklar</i>
PAPS with Vulnerabilities (Hassasiyetler)		
Woman head of household, Widowed or divorced, single <i>Kadın hane reisi, Dul ya da boşanmış, bekar</i>	15	Effort for stakeholder engagement <i>Paydaş katılımı sağlama</i>
Elderly people in need of care and social assistance, Home/bedbound due to Chronic Disease <i>Bakıma ve sosyal yardıma muhtaç yaşlılar, Kronik rahatsızlık sebebi ile eve/yatağa bağımlı olan kişiler</i>	10	
Disabled (Physical / Mental) <i>Engelli (Fiziksel / Zihinsel)</i>	15	
Unemployed (although looking for a job) and Those who do not have social security, Poor and/or landless peasants <i>İşsiz (iş aramasına rağmen) ve Sosyal güvenliği olmayan kişiler, Yoksul ve/veya topraksız köylü</i>	10	
Those whose houses were heavily damaged in the earthquake	10	
Seasonal workers around the Project area <i>Proje alanı çevresinde olan mevsimlik işçiler</i>	-	Effort for stakeholder engagement <i>Paydaş katılımı sağlama</i>

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Category <i>Kategoriler</i>	Score <i>Puan</i>	Entitlements <i>Haklar</i>
Illiterate people <i>Okuma yazma bilmeyen kişiler</i>	-	New accommodation development support if accommodation areas are affected by the land use of the project by the Contractor. <i>Konaklama alanları projenin arazi kullanımından etkilenirse Yüklenici tarafından yeni konaklama alanı geliştirme desteği.</i>
Significantly Affected People (Önemli Ölçüde Etkilenen İnsanlar)		
Physical displaced PAHs <i>Fiziksel olarak yer değiştiren PEH'ler</i>	20	Moving support <i>Taşınma desteği</i> TLS by score <i>Puana göre TLS</i> Priority access to livelihood restoration measures <i>Geçim restorasyon önlemlerine öncelikli erişim</i>
Owners and users of the partially acquired parcels under multiple project impact <i>Çoklu proje etkisi altında bulunan kısmi kamulaştırılmış parsellerin sahipleri ve kullanıcıları</i>	15	TLS by score if livelihoods are affected <i>Geçim kaynakları etkileniyorsa puana göre TLS</i> Priority access to livelihood restoration measures <i>Geçim restorasyon önlemlerine öncelikli erişim</i>
Landless informal users of impacted public lands <i>Etkilenen kamu arazilerinin arazisiz gayri resmi kullanıcıları ve çobanlar</i>	15	TLS by score if livelihoods are affected <i>Geçim kaynakları etkileniyor ise puana göre TLS</i> Priority access to livelihood restoration measures <i>Geçim restorasyon önlemlerine öncelikli erişim</i> Community level supports <i>Topluluk düzeyinde destekler</i>
PAPs whose total land holding are affected by the Project more than 10% <i>Toplam toprak varlığı Projeden %10'den fazla etkilenen PEK'ler</i>	15	TLS by score if livelihoods are affected <i>Geçim kaynakları etkileniyorsa puana göre TLS</i> Priority access to livelihood restoration measures <i>Geçim restorasyon önlemlerine öncelikli erişim</i>
Employers have to leave from the job as a result of business relocation due to project activities <i>Proje faaliyetleri nedeniyle geçici faaliyet kesintisi sonucunda işten ayrılan işçiler.</i>	15	TLS for workers who lost their job due to the project <i>Proje nedeniyle işinden ayrılmak zorunda kalan işçiler için TLS</i>

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APPENDIX 3. ESTIMATED BUDGET

NTD: Will be provided as a separate excel sheet

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APPENDIX 4. LAND ENTRY PROTOCOL

ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY CONNECTION PROJECT LAND ENTRY PROTOCOL

PROVINCE	KP
DISTRICT	COORDINATE
SETTLEMENT	LOCATION
BLOCK/PLOT	DATE

The owner / user of the land has given the necessary permit by signing this document on the land with the above information, provided that the necessary measurement is made and the payment of the damaged products determined by the relevant Provincial Directorate of Agriculture is paid by the MoTI as a result of the determinations to be made.

Reason for land entry:

Note: Necessary information about the activities to be carried out by MoTI was provided by DGoll Representative. Annexes:

Name Surname	Date	Signature
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Landowner/Shareholder
Land user
Settlement Head (Mukhtar)
DGoll Representative
CC Representative

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APPENDIX 5. LAND EXIT PROTOCOL

ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY CONNECTION PROJECT LAND EXIT PROTOCOL

PROVINCE	KP
DISTRICT	COORDINATE
SETTLEMENT	LOCATION
BLOCK/PLOT	DATE

The contractor completed the reinstatement of the land used for the construction Works within the scope of the Çukurova Region and İskenderun Bay Railway Connection Project and the land mentioned above was handed back to the landowner. The Owner / user releases the Project Contractor by declaring that he/she has no rights or receivables.

This protocol does not give the Contractor any guarantee or claim under contracting agreements with MoTI.

Note: The reinstated or restored places should be listed, photographed, if the crop payment is paid, the "Crop Payment Agreement" should be filled and added to this protocol. (See. Land Entry Protocol)

Annexes:

Name Surname	Date	Signature
Landowner/Shareholder		
Landuser		
Settlement Head (Mukhtar)		
DGoll Representative		
CC Representative		

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APPENDIX 6. REPLACEMENT COSTS OF SÜPER ENERJİ



COSTS OF REPLACEMENT OF SÜPER ENERJİ INC. CO. (Estimated and approximate prices)

- **EXCAVATION, FILLING, LEVELING AND CONCRETE**

The site concreting cost of 65 decares is approximately;

$$65000 \text{ m}^2 * 40 \$ / \text{m}^2 = \underline{2600000 \$}$$

- **COVERING THE LAND BOUNDARIES**

If we take the average circumference length of 65 acres of 1500 meters and width of 30 cm in height as 3 m wall and above 3 m sheet metal;

$$3 \text{ m concrete: } 350 \$ / \text{m} * 1500 \text{ m} = \underline{525000 \$}$$

$$3 \text{ m metal: } 100 \$ / \text{m} * 1500 \text{ m} = \underline{150000 \$}$$

$$\underline{\text{TOTAL : } 675000 \$}$$

- **BUILT-IN SILOS**

$$\text{Average } 50000 \$ / \text{pcs} * 2 \text{ pcs} = \underline{100000 \$}$$

- **ADMINISTRATIVE BUILDING**

$$\text{An average of } 300 \text{ m}^2 \text{ administrative building; } 300 \text{ m}^2 * 350 \$ / \text{m}^2 = \underline{105000 \$}$$

- **BATHROOM, RUNNING AND DINING HALL**

Average 400 m²;

$$400 \text{ m}^2 * 300 \$ / \text{m}^2 = \underline{120000 \$}$$

- **SEPTIC**

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$$2 \text{ pcs} * 60 \text{ m}^3 * 250 \$ / \text{m}^3 = \underline{\underline{30000 \$}}$$

- **PACKING AREA**

1050 m² roof is about 60 ton

$$60000 \text{ kg} * 2 \$ / \text{kg} = \underline{\underline{120000 \$}}$$

- **SEDIMENTATION POOL**

An average of 2 double pools;

$$8 \text{ m} * 4 \text{ m} * 1 \text{ m} = 32 \text{ m}^3$$

$$8000 \$ / \text{pcs} * 2 * 2 = \underline{\underline{32000 \$}}$$

- **PLANT BILDING**

$$50 \text{ M}^2 * 300\$ / \text{m}^2 = \underline{\underline{15000 \$}}$$

- **WEIGHBRIDG BUILDING AND AREA**

For weighbridge processing building $30 \text{ m}^2 * 300 \$ / \text{m}^2 = \underline{\underline{9000 \$}}$

For weighbridge area $3 \text{ m} * 16 \text{ m} = 48 \text{ m}^2 + 5 \text{ m}$ entry ramp + 5 m exit ramp;
 $(58 \text{ m}^2 * 300 \$ / \text{m}^2) + (10 \text{ m} * 600\$ / \text{m}^2) = \underline{\underline{23400 \$}}$

TOTAL : **32400 \\$**

- **MACHINERY REMOVAL, INSTALLATION AND TRANSPORT**

Machines Removing Material + Workmanship: $250000 \text{ kg} * 0.5 \$ / \text{kg} =$
125000 \\$

Machines Installation Material + Workmanship: $250000 \text{ kg} * 1 \$ / \text{kg} =$
250000 \\$

Material Repair Due to Removing: $250000 \text{ kg} * 0.5 \$ / \text{kg} = \underline{\underline{125000 \$}}$

Transport : about 25 trucks * 1000 \$ =
25000 \\$

Crane Operation $20000 \$ / \text{month} * 5 \text{ months} * 2 \text{ crane} = \underline{\underline{200000 \$}}$

TOTAL : **= 725000 \\$**

- **WATERING SYSTEM**

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For land watering system	
350 boy 2" galvanized pipe 350*65 \$	=22750 \$
40 pcs 2" sprinklers (jet sprinkler) 40*240 \$	= 9600 \$
Hydrophore system	=15000 \$
Other materials and workmanship (küresel vana, nipel, maşon vs)	= 5000 \$
TOTAL :	=52350 \$

- **TRAFO**

400 KW Transformer and general boards	= <u>17000 \$</u>
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- **ENVIRONMENT AND LICENSE PERMITS**

Report and fee for license permission: 65*750 \$/decar	= <u>48750\$</u>
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Report and fee for Environmental Permit: 65*500 \$/decar	= <u>32500\$</u>
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Equipment cost and permit for fire report: 65*500\$/decar	= <u>32500\$</u>
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- **FREIGHT DIFFERENCE**

As the new location will be far from the possible port, there will be a difference in coal transportation. If we think that we have imported an average of 250,000 / year coal, the transportation difference will be \$ 0.09 per km, and the annual cost will be calculated as $250,000 * \$ 0.09 * \text{km} * \text{year}$.

If a sample account is made (10 km account is taken)

$250,000 * \$ 0.09 * 10\text{km} = \$ 225000$

(The calculation has been made over 10 km and the current km will be recalculated in case the move takes place.)

Note: The account has been made for only 1 year and our company will have a freight difference of only **\$ 225000** for every year thereafter.

- **LOSS OF BUSSINES/INCOME**

Salary and SSI payments will occur as we will not be able to employ the existing shipping staff during possible moving (approximately 6 months of moving and installation).

30.000 \$*6 moths	= <u>180000 \$</u>
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<u>GENERAL TOTAL</u>	= 4.917.500 \$ +KDV
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APPENDIX 7. SAMPLE COMPLAINT REGISTER FORM

Complaint register form			
Name of the person who received the complaint:		Date:	
Position:			
ŞİKÂYET SAHİBİ İLE İLGİLİ BİLGİLER		Type of complaint	
Name - surname (not mandatory)		Private land acquisition	☐
Telephone number (not mandatory)		Public land acquisition	☐
Address (not mandatory)		Environmental problems	☐
Village		Damage or lost during the construction	☐
Province - District		People and animal health	
In which way the complaint has been received	☐ Telephone	Access problems and negative restrictions	☐
	☐ Meetings	Social and Cultural problems	☐
	☐ Personal Application	Other:	
	☐ By post - email		
	☐ Petition		
	☐ Field visit		
	☐ Other:.....		
DETAILS OF THE COMPLAINT			
Attachments			 Page

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APPENDIX 8. SAMPLE FORM OF COMPLAINT CLOSURE

Form of complain closure		
Evaluation of the complaint		
Possible Action		
<i>(RP, SEP use the related documents)</i>		
Who executed the action		
Is there a need for compensation?	☐ YES	☐ NO
CLOSURE		
<i>This section needs to be completed and signed by the complaint processing committee (instead of the signature of the complainant a bank transaction document could be enclosed)</i>		
Officer in charge	Owner of the complaint	
Name-surname	Name-surname	
Date and signature	Date and signature (if there is no signature reasons for that need to be explained)	

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APPENDIX 9. HOUSEHOLD SURVEY FORMS

Provided as a separate document