



REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE

AYGM
Altyapı Yatırımları Genel Müdürlüğü



ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY CONNECTION PROJECT

RESETTLEMENT PLAN Addendum No:1

AYGM-CKR-RP-AD NO:1



1. Scope of the Addendum

This Resettlement Plan (RP) Addendum No. 1 has been prepared to present the additional information and impacts identified during Project implementation in a concise and structured manner, while remaining consistent with the principles and commitments set out in the original RP.

The Addendum presents parcel-level impacts in a tabulated format to clearly outline the scope and nature of land acquisition and expropriation impacts based on parcel-specific information that became available during Project implementation, as such information was not available at the time of preparation of the RP for the overall Çukurova Project due to absence of parcel-specific information. This Addendum confirms that the legal framework, eligibility criteria, entitlement matrix, and compensation principles established under the approved RP for the Çukurova Project remain fully applicable to these newly identified impacts.

Under RP Addendum No: 1, additional land acquisition requirements have been identified in the provinces of Adana and Hatay, affecting parcels that are legally owned by Organized Industrial Zone (OIZ) administrations. Although the affected parcels are registered as OIZ property, informal land use was identified during Project implementation through site-based field assessments and available records . No formal land users or tenants have been identified within the scope of this Addendum based on field verification and available documentation. These informal users constitute the Project Affected Persons (PAPs) under this Addendum and are eligible for livelihood support and assistance for affected assets and income impacts in accordance with the RP and ESS5 requirements .

The eleven (11) parcels subject to these additional assessments are presented on a parcel-by-parcel basis through summary tables, providing information on their location, ownership status, and the extent of land to be expropriated, as well as the identification of informal land users, where applicable. An overview of the affected provinces, districts, settlements, parcels, and ownership status is provided in Table1.

Table1 Parcels Scheduled for Initial Construction

No	Province	District	Settlement	Plot	Parcel	Ownership Type
1	Adana	Ceyhan	Sarımazı	-	1952	Ceyhan Organized Industrial Zone (OIZ)
2	Adana	Ceyhan	Sarımazı	-	1957	Ceyhan Organized Industrial Zone (OIZ)
3	Adana	Ceyhan	Sarımazı	-	1962	Ceyhan Organized Industrial Zone (OIZ)
4	Adana	Ceyhan	Sarımazı	-	1967	Ceyhan Organized Industrial Zone (OIZ)
5	Adana	Ceyhan	Sarımazı	-	1973	Ceyhan Organized Industrial Zone (OIZ)
6	Hatay	Erzin	Turunçlu	959	233	Hatay Erzin Organized Industrial Zone (OIZ)
7	Hatay	Erzin	Turunçlu	959	76	Hatay Erzin Organized Industrial Zone (OIZ)
8	Hatay	Erzin	Turunçlu	959	79	Hatay Erzin Organized Industrial Zone (OIZ)
9	Hatay	Erzin	Turunçlu	959	86	Hatay Erzin Organized Industrial Zone (OIZ)
10	Hatay	Erzin	Turunçlu	959	89	Hatay Erzin Organized Industrial Zone (OIZ)
11	Hatay	Erzin	Turunçlu	959	96	Hatay Erzin Organized Industrial Zone (OIZ)



In addition, the geographical distribution of the project area and the parcels subject to this Addendum and the additional assessment is presented through a location map included in Figure-1.



Figure-1 Geographic Distribution of the Project Area and Affected Parcels

Livelihood support measures applicable to the affected parties are implemented in accordance with the entitlement framework defined under the RLIP Çukuorva Project RP and are reflected in the relevant tables included in this Addendum.

The Addendum also addresses implementation arrangements and the grievance mechanism by referencing the existing systems established under the RP, thereby ensuring continuity in Project implementation while clearly identifying any updates or additions introduced through this Addendum. In this context, the existing institutional arrangements, roles and responsibilities, and grievance mechanism (GM) established under the RP will continue to be applied.

Where relevant, this Addendum further clarifies implementation procedures related to the identification of affected informal users, assessment of livelihood impacts, and provision of livelihood support measures, in line with ESS5 requirements.



2. Detailed Parcel Information

All 11 parcels covered under this Addendum are located within the boundaries of the Hatay Erzin and Ceyhan OIZs, and none of the parcels are privately owned by individuals. With the exception of one parcel, all of the identified parcels are subject to informal use. Based on the findings of field studies, agricultural activities are carried out on these parcels, and the cultivated products are harvested on a periodic basis.

The duration of agricultural use varies from parcel to parcel; however, in general terms, the parcels have been cultivated for an extended period of time. The current users indicate that the use rights have been transferred to them from previous generations. As a result, although the parcels are recorded as public land in official state records, they are locally used for agricultural purposes by village residents. In the absence of formal legal registration, the use of the parcels continues based on customary and locally accepted practices. This information is further supported by parcel-level Land Acquisition and Clearance (LAC) Forms, which document crop types and duration of use based on user declarations.

User identification has been carried out based on actual land use at parcel and sub-parcel level. In cases where multiple users cultivate the same parcel, or where a single user cultivates multiple parcels, land use has been disaggregated accordingly to reflect user-based cultivation patterns.

During the initial informal user identification studies conducted at the beginning of the year, references were made to the existence of informal tenancy arrangements within the Project area. Individuals who use the parcels were reported to occasionally lease the land under their use to third parties on an annual or multi-year basis, based on informal and locally acknowledged arrangements without formal documentation. However, during the subsequent valuation studies carried out by the independent valuation expert, informal users did not refer to or declare any such rental arrangements, and the valuation process was conducted based on direct land use and cultivation practices observed on-site.

Accordingly, while such arrangements may exist within local practice, no claims or entitlements related to informal tenancy were formally asserted during the valuation process. For the purposes of this Addendum, all users have therefore been assessed based on actual land use and livelihood dependency, rather than informal rental relations.

Parcel no. 233 is a relatively large parcel and has been subject to a lawsuit regarding objections to expropriation compensation dating back approximately 50 years. It has been stated by the title holder of the parcel, Hatay Erzin Organized Industrial Zone (OIZ), that the process has reached its final stage, and that the outstanding payments are expected to be completed by April 2026, leading to the formal closure of the case. Detailed title deed information for the parcel has been presented in the relevant LAC document.



Only one parcel contains an unfinished structure that is currently idle. The structure was reportedly initiated approximately 25 years ago by the late father of the owner family but was never completed. According to the son and one of the legal heirs (the former informal land user), the building has not been used by any family member for more than 20 years, and there is no intention to complete or use it in the future. This structure has been considered solely as a physical asset within the scope of livelihood impact assessment and does not represent an actively used residential or economic unit. Other than this, no privately owned assets or structures belonging to individuals have been identified on the parcels.

Based on parcel-level assessments, the Addendum identifies no impacts on the number of trees, pasturelands, or other fixed land-based assets. Although agricultural activities have been carried out on certain parcels, the Project does not result in a permanent loss of privately owned land or legally recognized land-based income sources, as the affected parcels are publicly owned and used informally. In addition, no impact on agricultural workers or businesses has been identified based on available data and field observations.

Based on field surveys and consultations conducted during site visits, no vulnerable PAPs have been identified among the affected users based on available information and field verification. This assessment has been confirmed through consultations with PAPs and the relevant village headmen (mukhtars), who indicated that there are no households or individuals meeting the vulnerability criteria defined in the RP.

Table 2 Summary of Parcels, Land Use Status, and Identified Structures

No	Province District VillageVillage	Plot Parcel	Land Ownership Status	Land Owner Information	Area of the land (m ²)	Informal User–Cultivated Areas by Parcel (m ²)	Utilities/ Structures	Presence of Informal Users	Number of Informal Users
1	Adana Ceyhan Sarımazı	1952	Public Land	Ceyhan OIZ	28189,06	5.161,98	None	Yes	1
2	Adana Ceyhan Sarımazı	1957	Public Land	Ceyhan OIZ	26475,27	6.387,15	None	Yes	2
3	Adana Ceyhan Sarımazı	1962	Public Land	Ceyhan OIZ	25678,16	17.073,38	None	Yes	2
4	Adana Ceyhan Sarımazı	1967	Public Land	Ceyhan OIZ	19976,95	8.372,00	None	Yes	1
5	Adana Ceyhan Sarımazı	1973	Public Land	Ceyhan OIZ	9902,37	6.328,00	None	No	0
6	Hatay Erzin Turunçlu	959/76	Public Land	Hatay Erzin OIZ	76873,5	5.779,96	None	Yes	1
7	Hatay Erzin Turunçlu	959/79	Public Land	Hatay Erzin OIZ	62313,47	9.159,46	None	Yes	6
8	Hatay Erzin Turunçlu	959/86	Public Land	Hatay Erzin OIZ	57848,14	7.629,65	None	Yes	1
9	Hatay Erzin Turunçlu	959/89	Public Land	Hatay Erzin OIZ	53031,92	8.309,76	None	Yes	2
10	Hatay Erzin Turunçlu	959/96	Public Land	Hatay Erzin OIZ	40728,55	7.846,99	None	Yes	2
11	Hatay Erzin Turunçlu	959/233	Public Land	Hatay Erzin OIZ	1.982.446,98	133.451,82	1 Idle Structure	Yes	18

3. RP Consultations

Preliminary field assessments for the asset inventory related to the parcels covered under this Addendum were carried out by the contractors in March and November 2025. These preliminary works were undertaken to support the identification and verification of existing land use patterns and any potential assets prior to the formal asset inventory process. In parallel, regular and ongoing consultations were conducted by the Construction Contactor (CC) with the relevant stakeholders. These consultations primarily focused on obtaining required work permits, as well as coordination related to drilling, surveying, and other infrastructure works planned to be carried out within the scope of the Project. Such engagements were maintained on a periodic basis to ensure alignment with OIZ procedures, uninterrupted access to the sites, and the timely implementation of Project activities.

The identification of informal land use to date is based on fieldwork carried out by the DGII PIU on 19 December 2025 and subsequent site assessments conducted between 30.12.2025, 02.01.2026, and between 05.01.2026 and 10.01.2026 which formed the basis for the preparation of this Addendum. These initial studies served as the basis for establishing the overall approach and implementation roadmap for the informal user identification and livelihood support process.

Following the decision to proceed with the process under the supervision of independent valuation experts, field studies were initiated accordingly. The date of the valuation fieldwork conducted for the first 10 parcels (19.02.2026) was established as the cut-off date for these parcels. Informal users of the initial 10 parcels did not raise any claims other than crop payments for the parcels and vacated the land without any issues on the date specified in the mediation agreement.

Subsequently, a second round of fieldwork was conducted for Parcel No: 233, for which the cut-off date was defined as 04.03.2026. Throughout the preparation of the valuation reports and the mediation process, Community Liaison Officers (CLOs) maintained regular and documented engagement with each affected user, ensuring that all individuals were informed about the process and its key steps. In addition, formal notifications regarding the cut-off dates and valuation process were communicated to the relevant village headmen (muhtars) to ensure broader community awareness.

Informal users cultivating watermelons on the subject parcel requested to harvest their crops themselves prior to vacating the land. As the irrigation systems had been installed by the users, they indicated that they were familiar with the dismantling process and therefore only requested additional time for removal. Within the agreed timeframe, the irrigation systems were dismantled and the site was vacated without any issues. As the idle structure on the parcel had not been in use for a long time, no claims were raised other than determined payment amount for the structure.

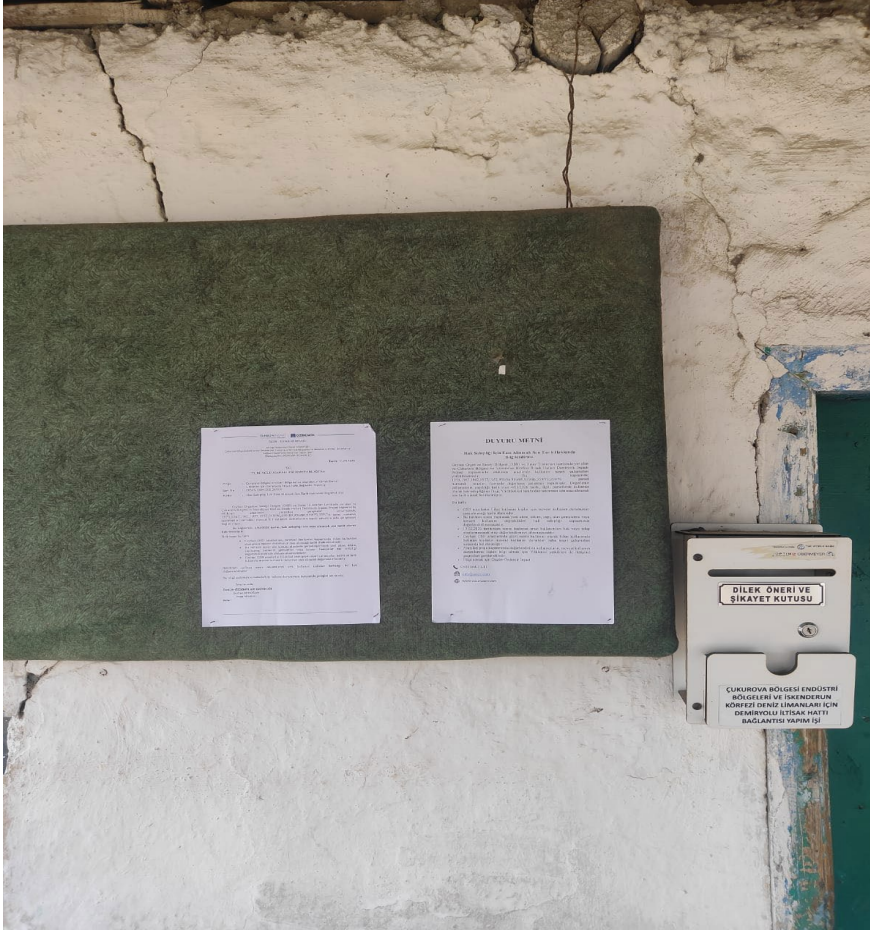


Figure 2 Public announcement of cut-off dates (19.02.2026 and 04.03.2026) for determining eligible informal land users within the Project area.

On 18.03.2026, mediation meetings were held in the presence of the mediator and contractor representatives, and agreements were reached, completing the process for the first 10 parcels. Following the completion of this process, the relevant LAC documentation for each parcel has been updated with the latest supporting documents and submitted to the World Bank.

For Parcel No: 233, similar meetings were conducted on 26.03.2026, and agreements were finalized through the mediation process. Payments are scheduled to be completed by 03.04.2026. Following the completion of payments, the LAC documentation for Parcel No: 233 has been finalized, together with all relevant supporting annexes, and prepared for submission to the World Bank.

All documentation related to the process has been systematically recorded, verified, and maintained through the Land Acquisition and Clearance (LAC) documentation system, including mediation records, valuation reports, and user declarations, ensuring traceability, transparency, and consistency throughout the implementation process.



4. Entitlement Matrix

The Entitlement Matrix summarizes the eligibility criteria, livelihood support principles, and livelihood support measures applicable to Project Affected Persons (PAPs) in accordance with ESS5. Entitlements are defined based on actual land use and livelihood dependency, rather than legal ownership status, to ensure that income losses resulting from land acquisition are adequately addressed. The matrix serves as the primary reference framework for the implementation of livelihood support and transitional livelihood support measures, as presented in Table 3 below.

Table 3. Entitlement Matrix

No	Impact Category	Actual No. of Affected HHs / Persons / Assets	Entitled Persons	Entitlement	Explanations / Responsibilities
1	Loss of agricultural lands / loss of land-based livelihoods / unviable land parts due to land acquisition	29 land users	Formal and informal actual land users (crop owners)	<ul style="list-style-type: none"> • Cash-based livelihood support for annual crops calculated based on Gross Crop Value (GCV). • <i>Livelihood support is provided to actual crop users, regardless of land ownership.</i> • <i>Harvesting of standing crops prior to construction is allowed where feasible.</i> 	<p>Identification of affected persons is based strictly on verified land use and livelihood dependency at parcel and sub-parcel level, rather than formal ownership records. All informal users have been identified through field surveys, user-level verification, and land use documentation (including LAC forms).</p> <p>Livelihood impacts have been assessed using a gross agricultural production value approach, reflecting actual cultivation patterns and crop types observed on-site. In cases where multiple users cultivate the same parcel or a single user utilizes multiple parcels, allocations have been made based on actual use, with sub-parcel distinctions applied where necessary.</p> <p>In line with ESS5, informal users are recognized as eligible for livelihood support measures, regardless of the absence of formal land tenure. Where livelihood support measures are not covered under national legislation (including Article 19 of the Expropriation Law), payments are ensured through the RP–LRP Fund. All compensation and livelihood assistance payments for the informal users covered under this Addendum have been fully completed prior to the submission of this document to the World Bank.</p> <p>The process ensures that all identified users are treated consistently, transparently, and in alignment with ESS5 principles, with a focus on restoring livelihoods rather than compensating for land ownership. Accordingly, this Addendum reflects a completed implementation process for the initial 11 parcels subject to World Bank review and clearance.</p>



No	Impact Category	Actual No. of Affected HHs / Persons / Assets	Entitled Persons	Entitlement	Explanations / Responsibilities
2	No impact on public infrastructure has been identified at this stage. This provision applies only in case of unforeseen damage during construction.	None identified	Relevant public authority (in case of damage)	In the event of construction-related damage, affected infrastructure will be restored or reinstated at full replacement cost in coordination with the responsible authority.	All required permits and approvals have been obtained. The Project design incorporates avoidance measures. The Contractor will be responsible for implementing all protection and reinstatement measures during construction. The Supervision Consultant will monitor and verify compliance on site, and DGII will oversee the overall process and coordinate with the relevant institutions as necessary.
3	Cumulative impacts on PAPs (multiple project impacts on the same land)	0	Potentially affected users (if threshold exceeded)	Targeted Livelihood Support (TLS) and additional income restoration measures would be provided if applicable.	Based on user-based assessment and available data, no affected household has been identified as experiencing $\geq 10\%$ loss of total agricultural land used for livelihood purposes. Therefore, mandatory livelihood restoration measures are not applicable under ESS5. This category is retained as a precautionary mechanism should future cumulative impacts arise.



5. Vulnerability Assessment

A vulnerability screening was conducted as part of the land acquisition impact assessment process, during land use identification and stakeholder engagement activities. The assessment focused specifically on vulnerabilities that could limit a Project Affected Person's (PAP's) ability to participate in consultation and decision-making processes related to land acquisition, adapt to land-based impacts, or restore their livelihoods following the loss of land use.

The screening considered vulnerability criteria commonly recognized under ESS5, including but not limited to: female- or child-headed households, persons with disabilities, the elderly, very poor households, persons without social security, illiterate persons, and PAPs without secure land tenure who may lose rented land without having alternative land. In this context, vulnerability has been assessed in relation to the capacity of affected persons to respond to land acquisition impacts, participate in decision-making processes, and restore their livelihoods.

Based on this assessment, no vulnerable PAPs have been identified among the 29 informal land users cultivating the 11 affected parcels, based on available information and field verification. Nevertheless, vulnerability will continue to be monitored throughout implementation, and where identified, appropriate support measures will be developed in line with ESS5 requirements.

6. Budget and Cost Estimates

This section presents the budget of the Resettlement Plan (RP), reflecting the current understanding of livelihood impacts within the Project Area of Influence based on progressively verified field data, parcel-level assessments, and asset inventories. To date, detailed livelihood support calculations have been completed for 11 parcels, providing the most reliable and verified basis for the budget:

- For the first 10 parcels, a total livelihood support amount of 910.939,36 TL has been calculated and paid, based on confirmed agricultural land use and crop-based impacts (see Table 4).
- For the 11th parcel (Parcel No: 233), which represents a significantly larger and atypical case, a separate and detailed calculation has been undertaken, resulting in a livelihood support amount of 8.041.230,38 TL for crop-based impacts. In addition to the value of the idle (unfinished) structure (390.000,00 TL) (see Table 5).

These calculations are based on a gross agricultural production value approach, reflecting the value of affected agricultural output. The verified data from these parcels provides a robust analytical basis for estimating the overall budget, particularly considering that approximately 56 parcels are affected by informal land use. Building on this dataset, the budget has been



extrapolated using representative unit values and observed impact patterns, while also incorporating additional livelihood-related impacts identified during fieldwork.

Accordingly, the RP budget includes not only crop-based livelihood losses but also perennial assets (e.g. trees), income-generating infrastructure (such as irrigation systems and wells), and other livelihood-related assets, as well as potential additional support needs related to transitional impacts and vulnerability, in line with ESS5.

Based on this combined approach—integrating verified parcel data (Table 5 and Table 6), scaled estimations for remaining affected parcels, and additional asset and livelihood components—the total RP budget is estimated at approximately 90.000.000 TL.

This budget reflects a comprehensive allocation, designed to ensure that both currently identified and reasonably foreseeable livelihood impacts can be addressed in accordance with ESS5 principles.

Final livelihood support amounts and budget allocations will be confirmed following the completion of detailed valuation studies, full asset inventory, user identification, and entitlement verification processes, and will be formally documented within the RP implementation framework.

The livelihood support amounts calculated for the first 10 parcels are based on parcel-specific land use assessments and verified crop data collected at user level. A total of 13 users have been identified within these parcels. As some users cultivate more than one parcel, while certain parcels are used by multiple users, the affected areas have been further categorized into sub-parcels to accurately reflect user-based land use patterns. These calculations reflect the actual agricultural activities identified on-site and have been derived using the adopted gross production value approach. The resulting amounts represent the current verified baseline of livelihood impacts and form the initial component of the overall RP budget. The detailed breakdown of these calculations is presented in Table 4.

The livelihood support calculation for Parcel No: 233 has been undertaken separately due to its significantly larger size and distinct characteristics. This parcel represents a large, continuous land area along the Project alignment, with 18 informal users identified across 23 sub-parcels through field surveys. It is also noted that 2 of these users are also cultivating land within the first 10 parcels. The budget includes both crop-based livelihood losses and the value of an idle (unfinished) structure. Crop values have been calculated using the gross agricultural production approach, while the idle structure has been assessed based on its current condition, and its value has been included as a separate item in the total presented at the end of the table. Given its scale, this forms a standalone and consolidated calculation within the RP budget. The detailed breakdown is provided in Table 5.

Table 4 Livelihood Support Payments for the First 10 Parcels (Verified and Disbursed Amounts)

Informal User ID No	Neighborhood	Plot	Parcel	Sub-Parcel	Crop Type	Affected Area (m ²)	Total Area(m ²)	Support Amount Per Parcel (TL)	Total Support Amount (TL)
1	SARIMAZI	0	1967		Sunflower	8.372,00	19.976,95	87.906,00	87.906,00
2	SARIMAZI	0	1962		Sunflower	7.131,99	25.678,16	74.885,90	147.412,24
	SARIMAZI	0	1957	A	Sunflower	2.936,94	26.475,27	30.837,87	
	SARIMAZI	0	1962	A	Sunflower	7.131,99	25.678,16	41.688,47	
3	SARIMAZI	0	1952		Pea	5.161,98	28.189,06	180.669,30	321.949,06
	TURUNÇLU	959	89	B	Canola	3.672,73	53.031,92	45.909,13	
	TURUNÇLU	959	86		Canola	7.629,65	57.848,14	95.370,63	
4	TURUNÇLU	959	96	B	Sunflower	4.936,92	40.728,55	51.837,66	113.296,48
	TURUNÇLU	959	89	A	Sunflower	4.637,03	53.031,92	48.688,82	
	TURUNÇLU	959	79	A	Sunflower	1.216,19	62.313,47	12.770,00	



Informal User ID No	Neighborhood	Plot	Parcel	Sub-Parcel	Crop Type	Affected Area (m ²)	Total Area(m ²)	Support Amount Per Parcel (TL)	Total Support Amount (TL)
5	TURUNÇLU	959	76		Sunflower	5.779,96	76.873,50	60.689,58	78.306,38
	TURUNÇLU	959	79	C	Sunflower	1.677,79	62.313,47	17.616,80	
6	SARIMAZI	0	1957	B	Sunflower	3.450,21	26.475,27	36.227,21	36.227,21
7	TURUNÇLU	959	96	A	Sunflower	2.910,07	40.728,55	30.555,74	30.555,74
8	TURUNÇLU	959	79	B	Sunflower	2.356,48	62.313,47	24.743,04	24.743,04
9	TURUNÇLU	959	79	D	Sunflower	1.740,07	62.313,47	18.270,74	18.270,74
10	TURUNÇLU	959	79	E	Sunflower	2.005,90	62.313,47	21.061,95	21.061,95
11	TURUNÇLU	959	79	F	Sunflower	163,03	62.313,47	1.711,82	1.711,82
12	SARIMAZI	0	1962	A	Sunflower	2.809,40	25.678,16	29.498,70	29.498,70
13	SARIMAZI	0	1973			6.328,00	9.902,37	0,00	0,00
TOTAL								910.939,36	910.939,36



Table 5 Livelihood Support Calculation for Parcel No: 233 (Crop and Idle Structure Components)

TURUNÇLU Plot 959 Parcel 233					
Sub-Parcel ID No	Informal User ID No	Crop Type	Affected Area (m ²)	Total Area(m ²)	Support Amount (TL)
1	1	Wheat	3.316,80	1.982.446,98	19.486,20
2	2	Watermelon	28.841,99	1.982.446,98	2.884.198,00
3	3	Watermelon	4.168,13	1.982.446,98	2.526.978,60
4			10.287,43		
5			8.516,98		
6	4	Watermelon	7.844,74	1.982.446,98	2.032.547,00
7			12.480,73		
8	5	Barley	922,44	1.982.446,98	4.992,71
9	6	Wheat	170,71	1.982.446,98	9.840,62
10			1.504,29		
11	7	Barley	3.633,88	1.982.446,98	19.668,38



12	8	Sunflower	7.845,54	1.982.446,98	82.378,17
13	9	Sunflower	4.643,19	1.982.446,98	48.753,50
14	10	Sunflower	4.809,30	1.982.446,98	50.497,65
15	11	Sunflower	3.806,49	1.982.446,98	39.968,15
16	12	Sunflower	4.476,36	1.982.446,98	47.001,78
17	13	Sunflower	4.624,16	1.982.446,98	48.553,68
18	14	Sunflower	4.002,90	1.982.446,98	46.164,83
19			393,75		
20	15	Sunflower	4.431,88	1.982.446,98	46.534,74
21	16	Sunflower	3.854,92	1.982.446,98	40.476,66
22	17	Sunflower	3.795,64	1.982.446,98	39.854,22
23	18	Sunflower	5.079,57	1.982.446,98	53.335,49
SUB-TOTAL					8.041.230,38
IDLE STRUCTURE					390.000,00
TOTAL					8.431.000,00



7. Livelihood Restoration Plan

The livelihood impact assessment has been conducted based on parcel-level land use data, user identification studies, and field verification, with analysis undertaken at the user level in line with ESS5 principles. The assessment evaluated the proportion of affected land relative to the total agricultural land used for livelihood purposes.

The findings indicate that, based on available data and field verification, none of the affected households have been identified as experiencing a loss exceeding 10% of their total livelihood-related agricultural land. Accordingly, the magnitude of impact does not meet the threshold that would require additional livelihood restoration measures.

On this basis, no additional livelihood restoration support is warranted under this Addendum, and all identified impacts are adequately addressed through crop-based livelihood support measures reflecting actual land use.

This section confirms that a systematic, evidence-based, and ESS5-compliant assessment has been undertaken, and that the need for additional livelihood support has been rigorously evaluated and not triggered.

The implementation of livelihood support for informal land users will be monitored based on parcel and user-level records developed during the process, allowing for a consistent understanding of identified impacts and livelihood support measures provided. Monitoring outcomes will support the overall tracking of implementation and identification of any issues that may arise, in line with the approach set out in the Resettlement Plan (RP).

8. Grievance

No grievances or complaints have been identified in relation to the affected parcels. In addition, no grievances have been reported by informal land users with respect to the Project or any other related matters to date.



9. Project Documentation and Permitting Status

All official correspondence and project-related documentation relevant to the affected parcels have been systematically recorded and maintained within the Project documentation system. For each affected parcel, LAC Form has been prepared to support valuation and livelihood support calculations. Following the completion of independent valuation studies and the formalization of the process through mediation, all documentation related to user identification, valuation, agreements, and livelihood support measures has been consolidated within the Land Acquisition and Clearance (LAC) documentation system.

Permits for works within the affected parcels have been coordinated with the relevant authorities. The Erzin Organized Industrial Zone work permit has been officially issued and is included in the Annexes. For the Ceyhan Organized Industrial Zone, the permit request has been formally submitted and official correspondence is ongoing; issuance of the permit is anticipated in the near term, subject to completion of administrative procedures. With respect to utility crossings, permit applications to BOTAŞ and ASKİ have been formally submitted, and the approval processes are ongoing with the relevant institutions. Construction activities affecting these utilities will not commence until the relevant permits are obtained, and the current permit status is presented in the table below

Table 5. Permit Status Table

	Permit / Approval	Responsible Authority	Date	Status	Remarks / Reference
1	Erzin Organized Industrial Zone (OIZ) Work Permit	Erzin OIZ Directorate	05.08.2025	Obtained	Official permit issued; included in the Appendices
2	Ceyhan Organized Industrial Zone (OIZ) Work Permit	Ceyhan OIZ Directorate	14.01.2026	Obtained	Official permit issued; included in the Appendices



10. Conclusion

All eleven affected parcels are currently used by informal land users, all of whom reside in Sarımazı Village. None of the identified users hold formal ownership or legally recognized land use rights over the affected areas; however, they have been cultivating the land for livelihood purposes for an extended period.

Parcel 959/233 is subject to historical expropriation-related issues dating back to earlier periods and is currently registered under Hatay Erzin Organized Industrial Zone (OIZ). These legal matters are related to past expropriation processes and are not directly associated with the current Project.

The informal user identification, valuation, and agreement processes have been completed based on actual land use and livelihood dependency, supported by field verification and user-level assessments. The process has been implemented through structured engagement, valuation studies, and mediation-based agreements, ensuring that all affected users were informed and included.

The livelihood support process has been implemented in a timely and structured manner. Livelihood support payment process for the first 10 parcels was completed on 18.03.2026. Following the agreements signed on 26.03.2026 for Parcel No: 233, the corresponding livelihood payments are scheduled to be completed by 03.04.2026.

Regarding social risk and vulnerability, based on socio-economic surveys, field observations, and consultations, no vulnerable PAPs have been identified among the informal land users across the eleven affected parcels, based on available information and field verification. Accordingly, no additional vulnerability-specific measures are required beyond the standard livelihood support approach applied under the RP.

Stakeholder engagement has been maintained throughout the process, ensuring that communication with affected users was carried out in a consistent and structured manner.