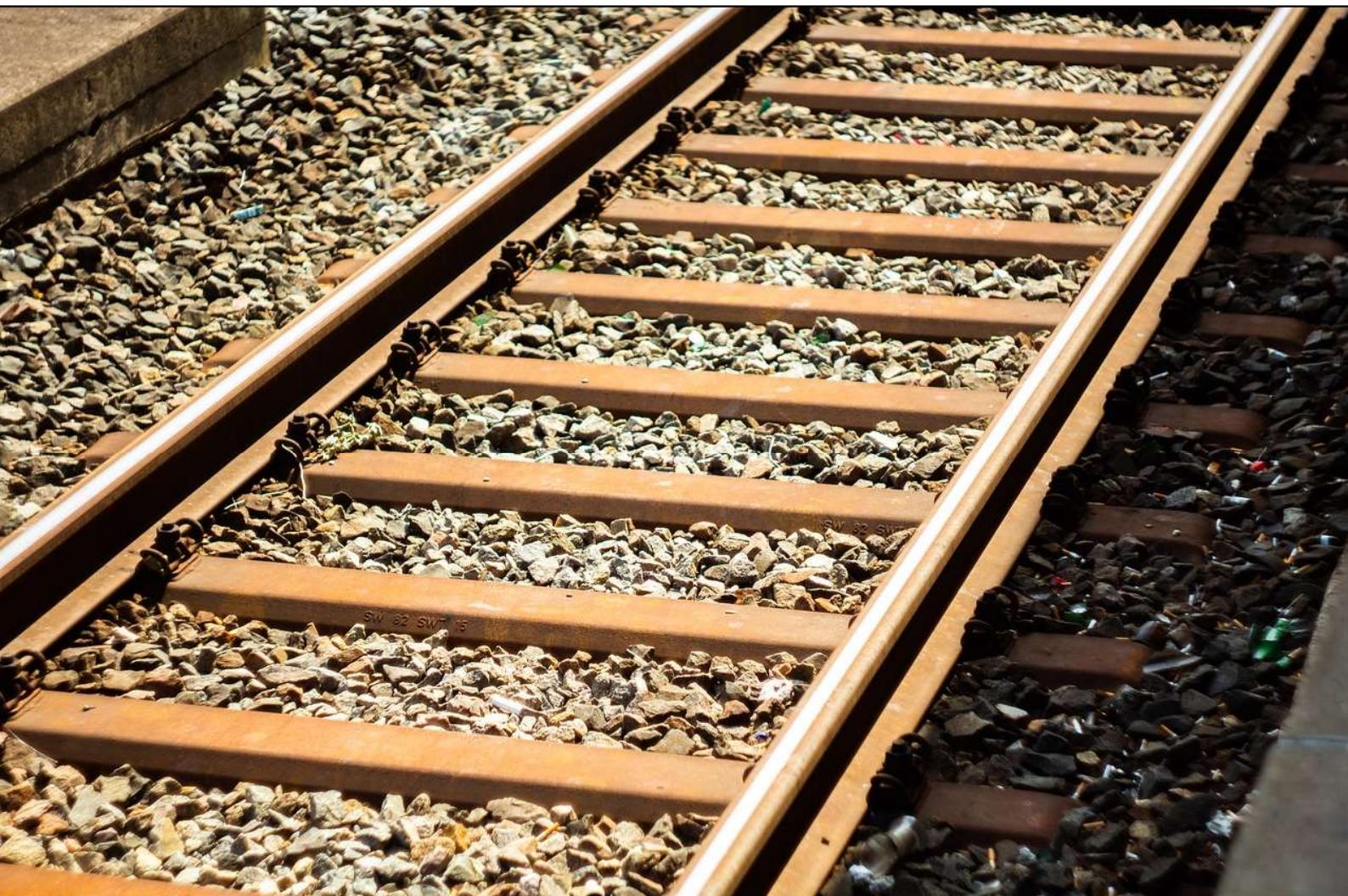




REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE

AYGM
Altyapı Yatırımları Genel Müdürlüğü

ÇINAR[®]
ENGINEERING
CONSULTANCY INC.



**FİLYOS PORT AND INDUSTRIAL ZONE RAILWAY CONNECTION
PROJECT
RESETTLEMENT PLAN
CNR-ZNG-RP-002
Final**



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ABBREVIATIONS&ACRONYMS

AoI	Area of Influence
CAD	Computer-Aided Design
CiMER	Presidency's Communication Center
CLO	Community Liaison Officers
CLS	Community level survey
CPI	Consumer Price Index
DGII	Directorate General of Infrastructure Investments
DSI	State Hydraulic Works
EIA	Environmental Impact Assessment
EM	Entitlement Matrix
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
ETL	Energy Transmission Line
GIB	Directorate of Revenue Administration
GLAC	Guide to Land Acquisition and Compensation
GM	Grievance Mechanism
ID	Identity Number of shareholder
IFI	International Finance Institution
KVKK	Personal Data Protection Law
LMC	Last-Mile Infrastructure Connectivity
LMP	Labor Management Procedure
LRP	Livelihood Restoration Programme
M&E	Monitoring and Evaluation
MoAF	Ministry of Agriculture and Forestry
MoCT	Ministry of Culture and Tourism
MoEUCC	Ministry of Environment, Urbanisation and Climate Change
MoIT	Ministry of Industry and Technology
MoTI	Ministry of Transport and Infrastructure
N/A	Not Available
PAH	Project Affected Household
PAP	Project Affected Person
PDO	Project Development Object
PIU	Project Implementation Unit

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PR	Public Relations
RP	Resettlement Plan
RLIP	Türkiye Rail Logistics Improvement Project
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
Tax ID	Tax identification number
TCDD	Turkish State Railways
TLS	Transitional Livelihood Support
TPAO	Turkish Petroleum Corporation
TR ID	Türkiye National Identification Number
TRY	Turkish Lira
TurkStat	Turkish Statistical Institute
USD	United State Dollar
VKN	Tax Identification Number
WB	World Bank

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GLOSSARY

Affected Persons: Person (whether natural or legal) experiencing either physical or economic displacement as a result of the project. See also displaced person and project-affected person.

Area of Influence: The area likely to be affected by: (i) the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project (ii) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or (iii) indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.

Associated Facilities: Facilities or activities that are not funded as part of the project and are: (a) directly and significantly related to the project; (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. For facilities or activities to be Associated Facilities, they must meet all three criteria. This Resettlement Plan (RP) will also be applicable to the Associated Facilities. The addenda will be plans for expropriation and compensation related to the additional lands.

Bushland: Forested or shrubland area, typically natural vegetation not used for agriculture.

Census: A complete (100%) 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: Persons who are affected in any of the ways described in World Bank (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 includes both those subject to physical and economic 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: "Eligibility" refers to criteria identifying which affected persons are entitled to receive compensation, resettlement assistance and/or other benefits as a result of land acquisition. Usually established either by law or via policies.

Entitlements: The compensation which persons, households, groups and/or communities affected by the Project are entitled to.

Expropriation: "Expropriation" refers to the government's act of a dispossession or a limitation of private ownership rights on property with compensation under legal framework.

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Field: Agricultural land or cultivated open field.

Field and road: Land comprising both agricultural fields and roads or access routes.

Filyos river: Filyos River and its surrounding land.

Flood plain: River floodplain; low-lying areas periodically inundated by river overflow.

Garden: Garden; small-scale area used for vegetables or fruit cultivation.

Health Protection: This land, owned by the Treasury, is designated as a health protection area. The decision is made by the officials of the General Directorate of Public Health. Such areas are generally associated with natural resources and are designated to implement measures aimed at preventing pollution.

Household: One or more people who live in the same house and form an economic unit.

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.

Income Support: Re-establishing the productive livelihood of the displaced persons to enable income generation equal to or, if possible, better than that earned by the displaced persons before resettlement.

Involuntary resettlement: Involuntary resettlement occurs in cases of expropriation or restrictions on land use based on eminent domain and negotiated settlements in which the state or expropriating authority can resort to expropriation.

Land acquisition/expropriation: Expropriation refers to the action by the state or an authority taking property or limiting ownership rights on property from its owner for public use or benefit water bodies.

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.

Livelihood: Refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.

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

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

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.

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.

Project: Refers to *Filyos Port and Industrial Zone Railway Connection Project*, including all its sub-projects, components and phases.

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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.

Railway: Railway corridor and associated land.

Railway and ancillary structures: Railway and associated infrastructure, such as stations, depots, or signaling facilities.

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

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.

Raw land: Unused, undeveloped natural land.

Raw land and bushland: Land combining undeveloped natural areas and shrubland/forested areas.

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.

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.

Restrictions on Land Use: “Restrictions on land use” refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.

Sandy area: Sandy land, with limited suitability for agriculture or construction.

Significantly Affected: 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.

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

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

Vacant area: Open land without any structures or current use.

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 others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Wasteland: Land unsuitable for agriculture or construction; low or no productive value.

Wasteland vacant area: Open and unproductive land; vacant area not suitable for use.

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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.

The Filyos Port and Industrial Zone Railway Connection Project (“Filyos Sub-project” or “the Project”) route is planned in an area located within the borders of Filyos, in the Çaycuma District of Zonguldak Province. The route begins northwest of Derekören Village and follows the surrounding natural geographical features, passing to the northeast of Gökçeler Village. Along the route, there are various natural and artificial obstacles, the most significant of which is the Filyos River, which will be crossed by a bridge as part of the project. After crossing the Filyos Industrial Zone and Filyos River, the route continues through the Turkish Petroleum Corporation (TPAO) facilities and extends to the end of the eastern quay of Filyos Port.

The project route is planned in an area located within the borders of Filyos, in the Çaycuma District of Zonguldak Province. The route begins northwest of Derekören Village and follows the surrounding natural geographical features, passing to the northeast of Gökçeler Village. Along the route, there are various natural and artificial obstacles, the most significant of which is the Filyos River, which will be crossed by a bridge as part of the project. After crossing the Filyos Industrial Zone and Filyos River, the route continues through the TPAO facilities and extends to the end of the eastern quay of Filyos Port.

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

The Directorate General of Infrastructure Investments 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 this RP, as well as any future RP Addendum(s).

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. Where additional or updated information becomes available through official land inspection, asset inventory, and valuation processes conducted prior to construction, such information will be reflected in RP Addendum(s), which will be prepared by the DGII PIU and submitted to the World Bank for review and approval prior to the commencement of construction works.

In the finalized project route, in order to reduce adverse impact on cultural heritage and on settlements in the Area of Influence (AoI) of the project, the project routing was changed. 36 parcels will be subject to land acquisition within the scope of Phase 2, as opposed to the 471 parcels anticipated in Phase 1. A total of 36 parcels are located within the expropriation corridor. Of these, 18 parcels are privately owned. A total of 102 shareholders were identified as having ownership rights on these 18 parcels.

Among these parcels, 8 parcels have a single shareholder, while 10 parcels have multiple shareholders, with shareholder numbers ranging from 2 to 22. This distribution indicates that some parcels have straightforward ownership structures, whereas others require coordinated engagement with several co-owners throughout the land acquisition process.

Among these 102 shareholders, 14 were identified as land users of the relevant private lands or first-degree relatives of the land users within the Project Affected Household (PAH). During the field visit, it was identified that some landowners were deceased, and this information has

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been duly recorded in the RP. In the case of parcel 110/13, the landowner is deceased and the contacted legal heir (son) explicitly refused to participate in the consultation process. Once the legal heirs are officially identified and ownership status is clarified, the necessary updates will be incorporated into the RP Addendum, which will be prepared by the DGII PIU and submitted to the World Bank for review and approval prior to the commencement of construction works.

The remaining 18 parcels are distributed as follows: lands owned by the Treasury (13 parcels), and lands owned by Turkish State Railways (TCDD) (5 parcels). One of the 13 Treasury parcels is currently subject to litigation (Gökçeler village, 105/43). Of the 13 treasury parcels, 11 are located within the boundaries of TPAO and Filyos Port, and since these lands are located within the security zone, no area is available for private use. Accordingly, due to their location within TPAO and Filyos Port boundaries and designated security zones where private use is not permitted, no informal or unauthorized land use was identified on these parcels.

To assess the physical and economic resettlement impacts of the project, the villages of Derekören, Gökçeler, Sazköy, and Sefercik (Çaycuma District of Zonguldak Province) were defined as the area of influence. The settlements of Derekören, Gökçeler, and Sazköy are located within the Çaycuma District of Zonguldak Province, as well as the Sefercik settlement in the Filyos town of the same district. These villages are home to the shareholders and land users of the 36 parcels located within the expropriation corridor, as well as the formal and/or informal users of public lands.

The socio-economic context of this RP is based on data collected during two rounds of field surveys. The initial survey was conducted in February 2025. In February 2025, due to seasonal conditions, access could not be obtained to the majority of parcels located within the expropriation corridor. For the parcels that were accessible, crop patterns could not be identified due to snow cover. To enable direct observation of the crops in their growing state, a second field visit was conducted in September 2025. This visit also aimed to re-establish contact with the PAHs that could not be reached in February 2025. Considering the low population levels in the settlements during the winter months, it was assessed that the autumn season -when agricultural activities are at their peak and local residents are largely present in their villages- represents the most suitable period for accessing PAHs.

In addition to this supplementary fieldwork, further meetings were held with officials from relevant units of Filyos Municipality, Çaycuma District Governorship, and Zonguldak Provincial Special Administration, in order to identify the formal and informal users of lands registered under the Treasury and TCDD. Furthermore, additional consultations were conducted with mukhtars (Derekören, Gökçeler, and Sefercik villages) and local community leaders to identify the formal or informal users of these lands.

As a result of the supplementary fieldwork conducted in September 2025, it was determined that all Treasury and TCDD lands (11 plots) within the boundaries of TPAO and the Filyos Port are under the exclusive use of TPAO. This area is secured through private security measures. Access is restricted to facility personnel only. Entry by other individuals is monitored and controlled by the gendarmerie and a private security company. Consequently, it was confirmed that there is no formal or informal individual use of these lands. Furthermore, due to the security measures in place, entry into the facility and photography are prohibited, preventing the conduct of any identification or survey activities on parcels located within this area.

In line with the findings of the completed consultations, no formal or informal users were identified on the relevant lands. During the parcel-level field identification activities, no evidence of land use was observed on these parcels. It was further determined that the majority of the lands registered under the Treasury and TCDD consist of areas that are divided by the railway, vacant, or otherwise fallow.

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Due to dense vegetation and the marshy nature of the terrain, access to two Treasury parcels (105/43 and 124/2) from the west could not be achieved. The eastern sides of these parcels were also inaccessible, as they are bordered by the Filyos River. Consequently, physical field identification activities could not be conducted on these two parcels.

In September 2025, an Asset Inventory was prepared by ÇINAR based on affected parcels. A valuation study was conducted for all assets (e.g., wire fences, walls), crops (e.g., trees), and other structures (e.g., abandoned or occupied buildings) located on the affected parcels. In the valuation of immovable properties, the Unit Price Annex of the Ministry of Culture and Tourism (MoCT), the unit prices of the Ministry of Environment, Urbanization and Climate Change (MoEUCC), and comparable land values were taken as reference. For crop valuation, the 'Zonguldak Province Çaycuma District Supplementary Schedule 1 for Fruit-Bearing and Non-Fruit-Bearing Individual Trees' was used.

This effort was undertaken to ensure the RP remains accurate, current, and fully aligned with World Bank standards. The Directorate of Real Estate and Expropriation will also carry out an Asset Inventory. Until the mentioned Asset Inventory is completed, the cut-off date established for this Resettlement Plan will remain 18 September 2025.

As part of the Asset Inventory process, ownership and user information was extracted from title deed and cadaster records using parcel numbers identified in the Expropriation Plan. Updated contact information for landowners and users was 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 conducted 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 was 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.

The total registered area of the 36 parcels located within the expropriation corridor defined for Phase 2 is 1,481,037.15 m², of which 130,142.01 m² is planned to be expropriated.

The total area of the 18 privately owned parcels, including the parcel currently under litigation, is 7,049.29 m², of which 5,397.24 m² will be subject to expropriation.

The remaining 18 parcels are under the ownership of the Treasury (including the parcel currently under litigation), and TCDD. Field investigations confirmed that there are no formal or informal users on these lands. It is further noted that 11 of these 18 public parcels are located within the boundaries of the TPAO and the Filyos Port, where no formal or informal individual use has been observed.

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If any formal or informal users are identified on the aforementioned public lands, additional verification and documentation activities will be conducted through on-site assessments and stakeholder engagement and the outcomes will be reflected in the RP Addendum(s), which will be prepared and submitted to the World Bank for review and approval prior to the commencement of construction works. Verified informal users will be considered for compensation and livelihood restoration measures in accordance with the World Bank's ESF. Detailed information on the Asset Inventory can be found in Appendix-1. Data related to the valuation study will also be presented within the same 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.

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

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 landowners and land users. All users of the affected land have been recorded in the Asset Inventory, Census and Valuations included in Appendix-1.

Potential Impacts of Physical and Economic Displacement

Affected Lands and Land Based Livelihoods

1. A draft Asset Inventory and Valuation study has been conducted to assess potential economic losses under the RP. However, the final studies will be carried out by the Directorate of Real Estate and Expropriation of DGII, and the actual losses and compensations can only be confirmed following the completion of these final assessments.
2. The cost of trees located on private lands will be paid to the registered landowner. 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.
3. On the plot numbered 118/3 (Derekören) and 168/1 (Sefercik), which belongs to TCDD, an apricot tree with potential economic value has been identified. In recent consultations with the mukhtars and key informant individuals of both Derekören, Gökceler, and Sefercik villages, no user was identified on this land. Other vegetation on the plot consists of shrubs that have no economic value.
4. None of the lands subject to the expropriation plan are officially designated as pastures or grazing areas. No areas suitable for grazing were identified on either private or public lands. Many areas are unsuitable for animal passage due to barriers separating the parcels from the road. Other areas mostly extend as narrow corridors along the sides of the railway. These sites, which are open to active passenger and freight train traffic, are also not safe for pedestrian or animal passage.
5. On the other hand, these areas are covered with dense shrub vegetation. This natural barrier renders pedestrian and animal passage across the lands impossible. For instance, during the land survey studies, the plots numbered 124/2 and 105/43, which belong to the Treasury, could not be accessed due to dense vegetation cover.

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6. To the west of the expropriation corridor, bridge and viaduct works related to the ongoing road project¹ on the opposite side of the highway² are continuing. These activities, located at the beginning of the internal road of Gökçeler village, have increased traffic density on the highway. In the mentioned section of the road, there is also an active construction site and excavation area. This area contributes to additional construction machinery traffic. The single-lane road has become even more congested due to existing vehicle traffic and construction machinery. These conditions also pose risks for animal crossings. Consequently, suitable and safe areas for pedestrian and animal passage along both sides of the highway are very limited.
 - Starting 40 meters north of Gökçeler Train Station and extending approximately 350 meters in a straight line to the north, a total of 18 private parcels are located side by side in a contiguous layout. All of these private parcels are adjacent to the highway on the west side and to the railway on the east side. No agricultural activities were observed on the parcels.
7. The gardens contain garden plants as well as fruit-bearing and non-fruit-bearing trees, while some parcels are entirely vacant/fallow in terms of agricultural production. The distribution of the trees observed during the land survey studies, by plot, is as follows.
 - a. *Privately owned parcels 102/22 and 102/23*: Fig tree (1), Acacia (1), Pear (1)
 - b. *Privately owned parcel 102/24*: Acacia (1), Poplar (1), Willow (1)
 - c. *Privately owned parcel 110/2*: Acacia (1)
8. According to the information provided in the expropriation plan, 3 of these 18 parcels are classified as fields, while the remaining parcels are classified as gardens. No evidence of cultivated or harvested crops was observed on the three parcels classified as fields.

Affected Structures

A detailed asset inventory, including all structures located on affected lands, will be conducted by Project Implementation Unit (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 September 2025. None of the PAH representatives, who are the land users, mentioned the presence of any structures on their parcels. However, during the site visit, structures that were not mentioned in the consultations but exist within the private parcels were also encountered.

While the compensation principles and framework are defined under this RP, the determination of compensation amounts will be carried out by the DGII Real Estate and Expropriation Department through the official valuation and asset inventory process. The DGII PIU will be responsible for ensuring that this process is duly completed and that the resulting figures are reflected in the RP implementation and the relevant RP Addendum(s). The finalized compensation amounts will be included in the RP Addendum(s), which will be prepared prior to the commencement of construction works and submitted to the World Bank for review and approval.

¹ Kilimli-Filyos-Saltukova Dual Carriageway Project (ongoing) / <https://www.bahadirgrup.com.tr/project/caycuma-bartin-ayr-hisaronu-zonguldak-yolu-ongermeli-kiris-yapim-isi/>

² Saltukova-Kilimli Road, Control Section No. 67-01.

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The starting and ending points of Gökçeler Train Station are located within the boundaries of public parcels (107/3 and 107/2 to the north) owned by TCDD. During the land survey the following points have been observed and recorded for valuation purposes.

- A steel-warehouse, and concrete-floored stop and waiting room belonging to Gökçeler Train Station were identified within parcel 107/3. The waiting room's door is locked, and there are no staff members inside (unmanned facility). Train arrival and departure times are posted outside the waiting room. Although the interior of the room appears to be largely out of use, the stop as a whole remains functional for passenger traffic.
- In an area that lies within the expropriation boundary but has been excluded from the expropriation process, there is an abandoned old two-storey building. This building is located on the west side of the railway, directly opposite the aforementioned waiting room. The structure is completely abandoned, and no signs of use were observed inside. The sections of the building where doors and windows should be lacking any materials serving a covering or enclosing function.
- Within private parcel 110/5, there is a garden positioned with one side parallel to the railway and the other side parallel to the road. An electric wire fence has been installed around this garden. These materials have been included in the valuation study for the private parcel.
- On private parcel 102/24, an abandoned warehouse structure was encountered. This warehouse is of semi-masonry construction.
- Between privately-owned parcel number 102/20 and the eastern side of the highway, there is a dilapidated old bus stop. Directly opposite this stop (on the western side of the road), there is another bus stop that has been renovated.

Considering the condition of the structures on both public and private parcels, no findings have been made that could indicate future physical displacement impacts. However, if any physical displacement impacts be identified at later stages of the Project, a separate RP and/or RP Addendum will be prepared by the DGII PIU and submitted to the World Bank for review and approval prior to the commencement of construction works.

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 for this RP. And if any adverse impacts not covered in this EM are encountered with the need for new land, the addendum will include additions to the EM as well.

For the affected lands:

- Cash compensation (including debris and depreciation costs) at full replacement cost will be 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.
- Cash compensation at full replacement cost will be 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.

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- Compensation will be 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 prices 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 impact 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 among PAPs consist of people such as female head of household, elderly, or disabled. Vulnerability Assurances will be provided to vulnerable PAPs, and livelihood restoration measures will be provided to people significantly affected by the project.

Vulnerable Groups among PAPs will also be helped to access stakeholder participation mechanisms, 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 to a bank to receive compensation.

Significantly Affected People: has been described for this RP as “PAPs whose total land holding are affected by the Project more than 10%”. Livelihood restoration measures have been planned for significantly affected people.

For Vulnerability Assessment for these groups see Appendix-2.

Livelihood restoration instruments will be:

- Transitional Livelihood Support (TLS)
- Local Employment
- Trainings

Monitoring and Evaluation (M&E)

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 expropriation, compensation and resettlement assistance are in compliance with the requirements of this RP and future RP Addendums and that restoration of livelihoods is sustainable, and no other intervention is required. The Completion Audit will be conducted by an External Monitoring Consultant following the implementation of each RP Addendum, where applicable. Internal and external

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monitoring reports will be reviewed as part of the Completion Audit, and field visits will be carried out to verify compliance and outcomes.

Stakeholder Engagement

The Stakeholder Engagement Plan (SEP) of the Project is already in place and the consultation activities targeting PAPs 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 DGII PIU will be responsible for establishing and maintaining a document management system to systematically record, store, and manage all documentation related to land acquisition and resettlement activities, including stakeholder consultations, asset inventory and surveys, valuation and compensation records, payment documents, compensation agreements, legal records, and all documentation related to the implementation of this RP and any future RP Addendum(s).

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 future RP Addendums 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. The final RP and RP addendum(s) will also be announced on the World Bank website with a separate link.

A 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 reflect on the implementation of the RP. The RP identified the indicators to monitor the effectiveness of the RP and relevant RP Addendum(s) 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 entitlements, principles, and objectives defined in RP and relevant RP Addendum(s).

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1 INTRODUCTION

Among Türkiye's transportation investments, railways are the most substantial infrastructures, as highlighted by the 12th Development Plan³ (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 research and development, 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 (2019-2023), 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 RLIP 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 object (PDO) is to reduce transport costs in selected rail freight corridors and to strengthen institutional capacity at the MoTI to deliver rail freight connectivity and manage rail-enables 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: Phase 2 Covid-19 response support, institutional strengthening, capacity building, and project implementation support.

Within the scope of the Component-1 of the Project for improving railway connections, it is planned to construct a railway connection line to the industrial facilities by Filyos Port and Industrial Zone Railway Connection Project ("the Project" or "Filyos Sub-project"). The main

³ https://www.sbb.gov.tr/wp-content/uploads/2023/12/On-İkinci-Kalkınma-Plani_2024-2028_11122023.pdf

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purpose of the Project is to carry out the transportation and distribution of goods arriving at Filyos Port in a safe and cost-effective way within the scope of Filyos Valley Project, which is planned to be built in Çaycuma District of Zonguldak province.

The railway route was revised considering the issues specified in Environmental and Social Commitment Plan (ESCP), and the studies and measurements that could not be performed due to the seasonal restrictions were carried out at Phase-2.

Phase-2 investigations were conducted on 36 parcels, building upon the findings of the Phase-1 studies.

The project line begins at the Gökçeler Station on the İrmak-Zonguldak Railway line. Further details can be found in the ESIA report under the section on Project Components.

The project route is planned in an area located within the borders of Filyos, in the Çaycuma District of Zonguldak Province. The route begins northwest of Derekören Village and follows the surrounding natural geographical features, passing to the northeast of Gökçeler Village. Along the route, there are various natural and artificial obstacles, the most significant of which is the Filyos River, which will be crossed by a bridge as part of the project. After crossing the Filyos Industrial Zone and Filyos River, the route continues through the TPAO facilities and extends to the end of the eastern quay of Filyos Port.

The risk classification of the project is identified as "Substantial" according to the World Bank 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), Labor Management Procedure (LMP), and Environmental and Social Management Plan (ESMP) have been prepared in compliance with the World Bank ESF, and Environmental and Social Standards for the Project.

1.2 Objectives of RP

The Directorate General 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. Any future RP Addendum(s) to be prepared will be based on the principles, procedures, and provisions set out in this RP.

The objectives of RP are as follows:

- To identify the land-based impacts of the project.
 - To develop and implement a fair, transparent and negotiated resettlement process for all project affected people (PAPs),
 - To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or levels prevailing prior to the beginning of project implementation, whichever is higher To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected,
- To establish compliance with WB requirements in the implementation of resettlement and compensation activities,
- To implement resettlement activities together with affected parties,

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- To enable PAPs to participate in the planning, implementation and monitoring processes of RP through continued consultation before and during the resettlement process,
- To develop and implement 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 receive additional assistance when required.

1.3 Scope of RP

The impacts of the Project land acquisition are identified in the ESIA report. 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. Any future RP Addendum(s) to be prepared will be based on the principles, procedures, and provisions set out in this RP.

As of January 2020, the settlements located along the planned project route for Phase 1 were the villages of Sazköy, Derekören, Gökçeler, and Aşağıihsaniye within the Filyos Township of Çaycuma District, Zonguldak Province, as well as the neighborhoods of Öteyüz and Sefercik. A total of 471 parcels were going to be affected by project components such as railways, roads, engineering structures, stations, and substations. Among these parcels, 139 were privately owned land with 715 PAPs, while 322 were registered in the name of the Treasury.

In the finalized project route, in order to reduce adverse impact on cultural heritage and on settlements in the Area of Influence (AoI) of the project, the project routing was changed. 36 parcels will be subject to land acquisition within the scope of Phase 2, as opposed to the 471 parcels anticipated in Phase 1.

A total of 36 parcels are located within the expropriation corridor. Of these, 18 parcels are privately owned. A total of 102 shareholders were identified as having ownership rights on these 18 parcels. Among these 102 shareholders, 14 were determined to be either the land users of the relevant private lands or first-degree relatives of the land owners within the Project Affected Household (PAH). In addition, one of the 102 shareholders is the sole owner of a parcel (Gökçeler village, 110/13) currently subject to ongoing litigation. The landowner is deceased, and the contacted heir (son) has explicitly refused to participate in the consultation.

The remaining 18 parcels are distributed as follows: lands owned by the Treasury (13 parcels), and lands owned by TCDD (5 parcels). One of the 13 Treasury parcels is currently subject to litigation (Gökçeler village, 105/43). Of the 13 treasury parcels, 11 are located within the boundaries of TPAO and Filyos Port, and since these lands are located within the security zone, no area is available for private use.

To assess the physical and economic resettlement impacts of the project, the villages of Derekören, Gökçeler, Sazköy, and Sefercik (Çaycuma District of Zonguldak Province) were defined as the area of influence. The settlements of Derekören, Gökçeler, and Sazköy are located within the Çaycuma District of Zonguldak Province, as well as the Sefercik settlement in the Filyos town of the same district. These villages are home to the shareholders and land users of the 36 parcels located within the expropriation corridor, as well as the formal and/or informal users of public lands.

The socio-economic context of this RP is based on data collected during two rounds of field surveys. The initial survey was conducted in February 2025. In February 2025, due to seasonal conditions, access could not be obtained to the majority of parcels located within the expropriation corridor. For the parcels that were accessible, crop patterns could not be identified due to snow cover. To enable direct observation of the crops in their growing state,

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a second field visit was conducted in September 2025. This visit also aimed to re-establish contact with the PAHs that could not be reached in February 2025. Considering the low population levels in the settlements during the winter months, it was assessed that the autumn season -when agricultural activities are at their peak and local residents are largely present in their villages- represents the most suitable period for accessing PAHs.

In addition to this supplementary fieldwork, further meetings were held with officials from relevant units of Filyos Municipality, Çaycuma District Governorship, and Zonguldak Provincial Special Administration, in order to identify the formal and informal users of lands registered under the Treasury and TCDD. Furthermore, additional consultations were conducted with mukhtars (Derekören, Gökçeler, and Sefercik villages) and local community leaders to identify the formal or informal users of these lands.

As a result of the supplementary fieldwork conducted in September 2025, it was determined that all Treasury and TCDD lands (11 plots) within the boundaries of TPAO and the Filyos Port are under the exclusive use of TPAO. This area is secured through private security measures. Access is restricted to facility personnel only. Entry by other individuals is monitored and controlled by the gendarmerie and a private security company. Consequently, it was confirmed that there is no formal or informal individual use of these lands. Furthermore, due to the security measures in place, entry into the facility and photography are prohibited, preventing the conduct of any identification or survey activities on parcels located within this area.

In line with the findings of the completed consultations, no formal or informal users were identified on the relevant lands. During the parcel-level field identification activities, no evidence of land use was observed on these parcels. It was further determined that the majority of the lands registered under the Treasury and TCDD consist of areas that are divided by the railway, vacant, or otherwise fallow. In accordance with WB ESS5, the Project thus managed to reduce the impacts of land acquisition on the affected people. This RP describes how to mitigate the adverse impacts of land acquisition in the Project and to monitor the mitigation measures.

The objectives set out in this plan will be applied to all Project activities developed in relation to the land acquisition, compensation and other mitigation efforts. This plan is a living document (to be updated as needed). Therefore, changes that may cause an update requirement in the Project's Environmental and Social Management System (ESMS) will also be applied to the RP and 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 stage; however, should additional land requirements arise during implementation, RP Addendum(s) will be prepared accordingly and submitted to the World Bank for approval prior to the commencement of construction works on the newly affected areas.

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2 LEGAL FRAMEWORK

This section outlines the legislative framework that governs 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 cultivating 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 a 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 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 subsequent instalments of the expropriation fee determined by the court are deposited into time-deposit accounts with quarterly terms at the bank designated by the court.

The process to be followed to resolve any 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 that the immovable property is in possession and that a claim has been made to acquire it by

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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) (see Appendix-5 and Appendix-6) 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 immovables, 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 immovables, resources or easement rights, identifies the fee according to Article 8 of Expropriation Law. It lodges a written application to the administration owning the asset by stating the amount it would pay based on this fee. If the

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owner of the asset 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 to appeal concerning the fee.

The immovables, resources 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 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.

2.1.3 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.

2.1.4 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.

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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 mukhtars of the settlement or municipal quarter.

2.1.5 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 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.

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 DGII has prepared an RP that covers;

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- the 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.
- 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.

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.

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2.3 Gaps 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 Group Policies are summarized in Table 2-1.

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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 strategy and standards to be followed in this RP
Census and Asset inventory and cut-off-dates	<p>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,</p> <p>Defining cut-off date in connection with census determines eligibility to access compensation, and prevents eligible persons, such as opportunistic settlers, from claiming benefits.</p>	<p>Turkish Law requires preparation of inventory of assets.</p> <p>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.</p> <p>According to Turkish Constitution, private users on public lands are not considered eligible to compensation by local law or regulations unless they have an official rental agreement with the government.</p>	<p>National requirement is limited to census of immovable assets and legal titleholders.</p> <p>Users are not included in the census.</p>	<p>An assets inventory will be prepared.</p> <p>All owners and assets will be identified by the Administration. Users including informal users will be identified in the scope of Asset Inventory and Census in line with ESS5.</p> <p>The cut-off date will be the date when the "asset inventory observation" will be conducted and the assets on the land are recorded.</p>
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 requires 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 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 be necessary to help them improve or at least restore their standards of living or livelihoods.	<p>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, "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. Accordingly, the lands are valued in accordance with ESS5.</p> <p>Buildings are compensated by use of their cost of construction given by reference values defined by MoEUC and market value. However, depreciation and debris costs are deducted from calculated values.</p>	<p>Land compensation is considered in terms of the difference based on full replacement cost.</p> <p>Compensations of fixed assets (trees and structures) are not at full replacement cost as it deducts certain items (depreciation, cutting costs, etc.).</p>	<p>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.</p> <p>There will be no depreciation, and any transaction costs associated with the land acquisition and compensation will be reimbursed to PAP.</p>
Compensation	<p>Livelihood restoration should be ensured.</p> <p>All PAPs should be included in entitlement to payments.</p>	<p>Turkish law covers expropriation value based on market value, and after deduction of depreciation cost. It also excludes registration, transfer taxes and livelihood impacts.</p> <p>Turkish law does not cover compensation for common property resources.</p> <p>If a payment is to be made, the joint account of the spouses will be used.</p>	<p>It is not fully aligned with the replacement cost requirement.</p>	<p>PAPs including non-titleholders, public land users, squatters and customary owners will be considered in line with livelihood restoration.</p> <p>Compensation for common property resources will be covered.</p> <p>Full replacement cost will be applied for all payments.</p> <p>Registration, transfer taxes and livelihood impacts will be included to calculation.</p> <p>Compensation payments will be made to individuals' own bank accounts, not to joint accounts of spouses.</p>
Economically displaced persons	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.	National law only recognises legal owners or legal tenants. There are no provisions for livelihood restoration or coverage of PAPs including non-titleholders, public land users, squatters and customary owners.	ESS5 compensates users also for any loss of assets, structures, crops and they are entitled to livelihood restoration	<p>The Project, including economically displaced persons without legally recognizable land rights, will follow the ESS5 requirements, and compensation will be made at full replacement cost by establishing the RP Fund by DGII and covering the gaps between expropriation payments and the full replacement cost.</p> <p>There will be no depreciation, and all transaction costs related to land acquisition and compensation will be reimbursed to the PAP.</p>
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 were evaluated and the alternative that would result in a minimal level of physical resettlement was selected.
Physical Displacement	All PAPs losing homes are entitled to resettlement	Resettlement entitlements are limited to certain categories of PAPs.		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.

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling strategy and standards to be followed in this RP
		<p>Each nuclear family within affected dwellings is entitled to a resettlement home; this provisioning exceeds international standards.</p> <p>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".</p> <p>In accordance with this provision, possession by usucaption is only for immovable property which is not registered in the title deed.</p>		<p>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.</p> <p>All PAPs will be entitled to different types of compensation in accordance with this RP and WB ESS5.</p>
Physical Displacement	<p>Homes and residential land will be compensated at replacement value.</p> <p>Amortization is not allowed.</p> <p>Rural, urban and residential land is compensated at market prices.</p>	<p>Lost homes are not compensated at replacement value.</p> <p>Homes are compensated at their cost of construction with high quality material in the market.</p> <p>Amortization is taken into account.</p> <p>Residential land is compensated at its market prices, by using a net capitalization method.</p>		<p>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.</p> <p>Depreciation of the asset will not be taken into account.</p> <p>In brief, the compensation for lands and structures will be at replacement cost as defined in the ESS5.</p>
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 the 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
Land Entry	According to ESS5, land cannot be entered for construction purposes without providing compensation to the landowners for the replacement cost	According to Turkish Constitution, even when land is acquired for a public interest, expropriation agencies cannot benefit from the expropriation of private lands and assets without paying into a bank account the value of the expropriated assets in advance of land entry.	There is no gap in terms of access to the land, but since the compensation for the replacement fee will be paid from the RP fund, the completion of expropriation is not sufficient for entry to the land.	<p>This gap will be covered by DGII through the RP Fund of the Project.</p> <p>RP requirements will be followed through protocols to be signed by owners/users during the entry and exit stages of the land, ensuring no access or entry to the land before RP is implemented and PAPs have received full compensation.</p> <p>(see Appendix-5 and Appendix-6)</p>
Compensation for Loss of Communal Assets	<p>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.</p> <p>Where appropriate, benefits and compensation associated with natural resource usage may be collective in nature rather than directly oriented towards individuals or households.</p>	Communal assets are compensated according to Article 30 of Expropriation Law. Properties owned by public institutions cannot be expropriated but can only 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.	Any loss of income and access 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 all 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.	<p>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 of land.</p> <p>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.</p>	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 provided according to Article 18 of the Expropriation Law.	<p>Within the scope of the RP, a study was carried out to identify informal users; however, no informal users were identified.</p> <p>As this RP will be followed for the duration of the Project, any informal users encountered during the project will also be entitled to compensation as ESS5.</p>

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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling strategy and standards to be followed in this RP
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 PAPs with 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.
Gender aspects	ESS5 para 26, 33. Particular attention must be paid to gender aspects. ESS5 para 18. Women's perspectives must be obtained through consultation and their interests factored into all aspects. ESS5 footnote 175. Documentation of ownership or occupancy and compensation should be issued in the names of both spouses or single heads of households and other resettlement assistance should be equally available to women and adapted to their needs.	There are no specific gender guidelines integrated in Expropriation Law. The Expropriation Law is gender neutral and titleholders will be compensated according to the law irrespective of gender. According to the Turkish legislation all siblings and extended family members, regardless of gender and age, have similar inheritance rights.	Gender is not reflected in any aspect of land acquisition or resettlement planning.	Safe stakeholder engagement opportunities will be provided for women. Women Community Liaison Officers (CLOs) will hold one-to-one meetings with women 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. Compensation payments will be made to individuals' own bank accounts, not to joint accounts of spouses. Participation of women-headed households in communication processes will be ensured to prevent any loss of their entitlements
Monitoring and Evaluation (M&E)	M&E is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	M&E needs to have a plan and a budget.	RP includes an M&E principle in accordance with WB standards.
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 with PAPs and disclosed according to SEP.
Consultation	Requires consultation with all categories of PAPs, including those without formal legal rights Affected persons should be informed about their entitlements, and consulted on livelihood restoration measures Special attention should be given to disadvantaged or vulnerable groups	No communication process has been defined outside the EIA. Within the EIA, there are no specific references to disadvantaged groups or non-formal rights holders.	There is no provision for continuous consultation and establishment of a grievance mechanism during implementation of the resettlement plan. PAPs including non-titleholders, public land users, squatters and customary owners, have not been included in livelihood restoration measures, including consultation processes. Special provisions for poor and vulnerable people, community engagement, gender impacts, and grievance mechanisms are also deficient.	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. All PAPs including non-titleholders and vulnerable groups will be included The GM will also be accessible for these groups.
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	In the expropriation process under national law the owner's consent is sought for the immovable property in the first instance but consent is not always achieved, and expropriation becomes compulsory.	There is no requirement of a project specific grievance mechanism	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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Gap Subject	WB Standards	Turkish Legislation	Gaps	Gap filling strategy and standards to be followed in this RP
	and grievances about the client's environmental and social performance.	<p>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.</p> <p>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.</p> <p>There is the Presidential Communication Centre (CiMER) which is a central unit where public complaints are handled.</p>		

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3 LAND NEED AND ACQUISITION PROCESS AND REQUIREMENTS

3.1 Land Need of the Project

A total of 36 parcels are located within the expropriation corridor. Of these, 18 parcels are privately owned. A total of 102 shareholders were identified as having ownership rights on these 18 parcels. Among these 102 shareholders, 14 were determined to be either the land users of the relevant private lands or first-degree relatives of the land users within the Project Affected Household (PAH). In addition, one of the 102 shareholders is the sole owner of a parcel (Gökçeler village, 110/13) currently subject to ongoing litigation. The landowner is deceased, and the contacted heir (son) has explicitly refused to participate in the consultation (see Table 3-1).

The remaining 18 parcels are distributed as follows: lands owned by the Treasury (13 parcels), and lands owned by TCDD (5 parcels). One of the 13 Treasury parcels is currently subject to litigation (Gökçeler village, 105/43). Of the 13 treasury parcels, 11 are located within the boundaries of TPAO and Filyos Port, and since these lands are located within the security zone, no area is available for private use (see Table 3-1).

The socio-economic context of this RP is based on data collected during two rounds of field surveys. The initial survey was conducted in February 2025. In February 2025, due to seasonal conditions, access could not be obtained to the majority of parcels located within the expropriation corridor. For the parcels that were accessible, crop patterns could not be identified due to snow cover. To enable direct observation of the crops in their growing state, a second field visit was conducted in September 2025. This visit also aimed to re-establish contact with the PAHs that could not be reached in February 2025. Considering the low population levels in the settlements during the winter months, it was assessed that the autumn season -when agricultural activities are at their peak and local residents are largely present in their villages- represents the most suitable period for accessing PAHs.

In addition to this supplementary fieldwork, further meetings were held with officials from relevant units of Filyos Municipality, Çaycuma District Governorship, and Zonguldak Provincial Special Administration, in order to identify the formal and informal users of lands registered under the Treasury and TCDD. Furthermore, additional consultations were conducted with mukhtars (Derekören, Gökçeler, and Sefercik villages) and local community leaders to identify the formal or informal users of these lands.

As a result of the supplementary fieldwork conducted in September 2025, it was determined that all Treasury and TCDD lands (11 plots) within the boundaries of TPAO and the Filyos Port are under the exclusive use of TPAO. This area is secured through private security measures. Access is restricted to facility personnel only. Entry by other individuals is monitored and controlled by the gendarmerie and a private security company. Consequently, it was confirmed that there is no formal or informal individual use of these lands. Furthermore, due to the security measures in place, entry into the facility and photography are prohibited, preventing the conduct of any identification or survey activities on parcels located within this area.

In line with the findings of the completed consultations, no formal or informal users were identified on the relevant lands. During the parcel-level field identification activities, no evidence of land use was observed on these parcels. It was further determined that the majority of the lands registered under the Treasury and TCDD consist of areas that are divided by the railway, vacant, or otherwise fallow.

The total registered area of the 36 parcels located within the expropriation corridor defined for Phase 2 is 1,481,037.15 m², of which 130,142.01 m² is planned to be expropriated.

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The total area of the 18 privately owned parcels, including the parcel currently under litigation, is 7,049.29 m², of which 5,397.24 m² will be subject to expropriation.

Ownership information of the lands in the land acquisition corridor was compiled based on the information and documents provided by DGII and presented in. The distribution of the parcels affected by the land expropriation process and number of PAPs are also given in Table 3-1. The total land loss due to expropriation is registered to be 130,142.01 m², 124,744.77 m² of this loss is in TCDD legal entity, and treasury lands (as of February 2025).

Table 3-1. Ownership Information and Expropriation Summary of Lands within the Expropriation Corridor

	Private	Treasury	TCDD Legal Entity	Total (m ²)
Size of the area (m²)	7,266.69	1,374,628.86	99,141.60	1,481,037.15
Area to be Expropriated (m²)	5,614.64	83,122.35	41,405.02	130,142.01
# of parcels	18	13	5	36
# of PAPs	102	NA	NA	102

A total of 4 settlements is affected by the land acquisition of the project. These settlements are located within the borders of Çaycuma district of Zonguldak Province. As seen in Table 3-2, which shows the distribution of the lands in the corridor to be expropriated according to the settlements.

Table 3-2. Distribution of Lands in the Expropriation Corridor by Settlements

Settlement	Number of Affected Parcel	Privately owned parcels	Number of PAP	Treasury land	TCDD Legal Entity
Gökçeler	23	18	102	2	3
Sazköy	6	0	0	6	0
Sefercik	6	0	0	5	1
Derecikören	1	0	0	0	1
Total	36	18	0	13	5

Details of the expropriation corridor including private and public parcels are given in Figure 3-1, Figure 3-2, and Figure 3-3.

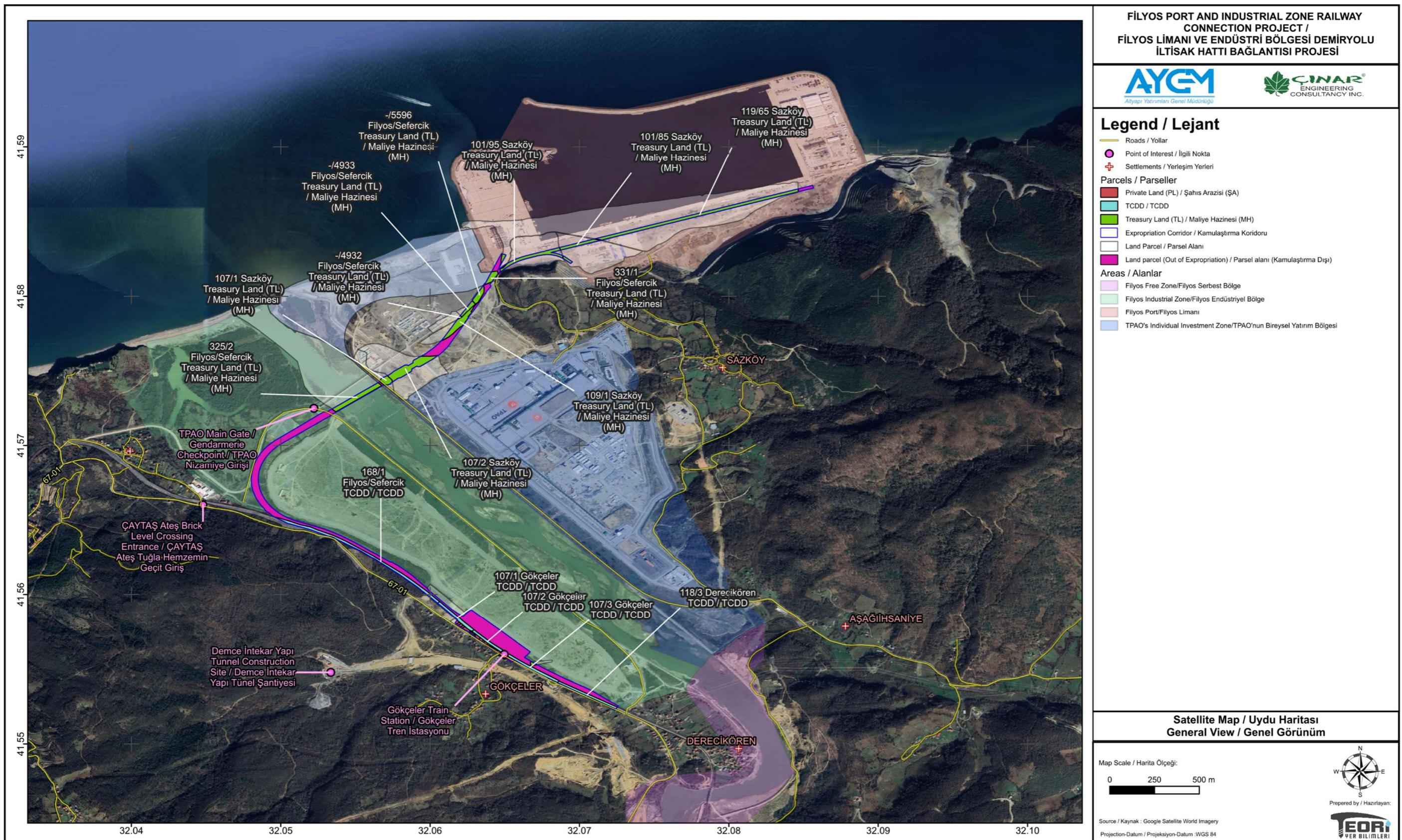
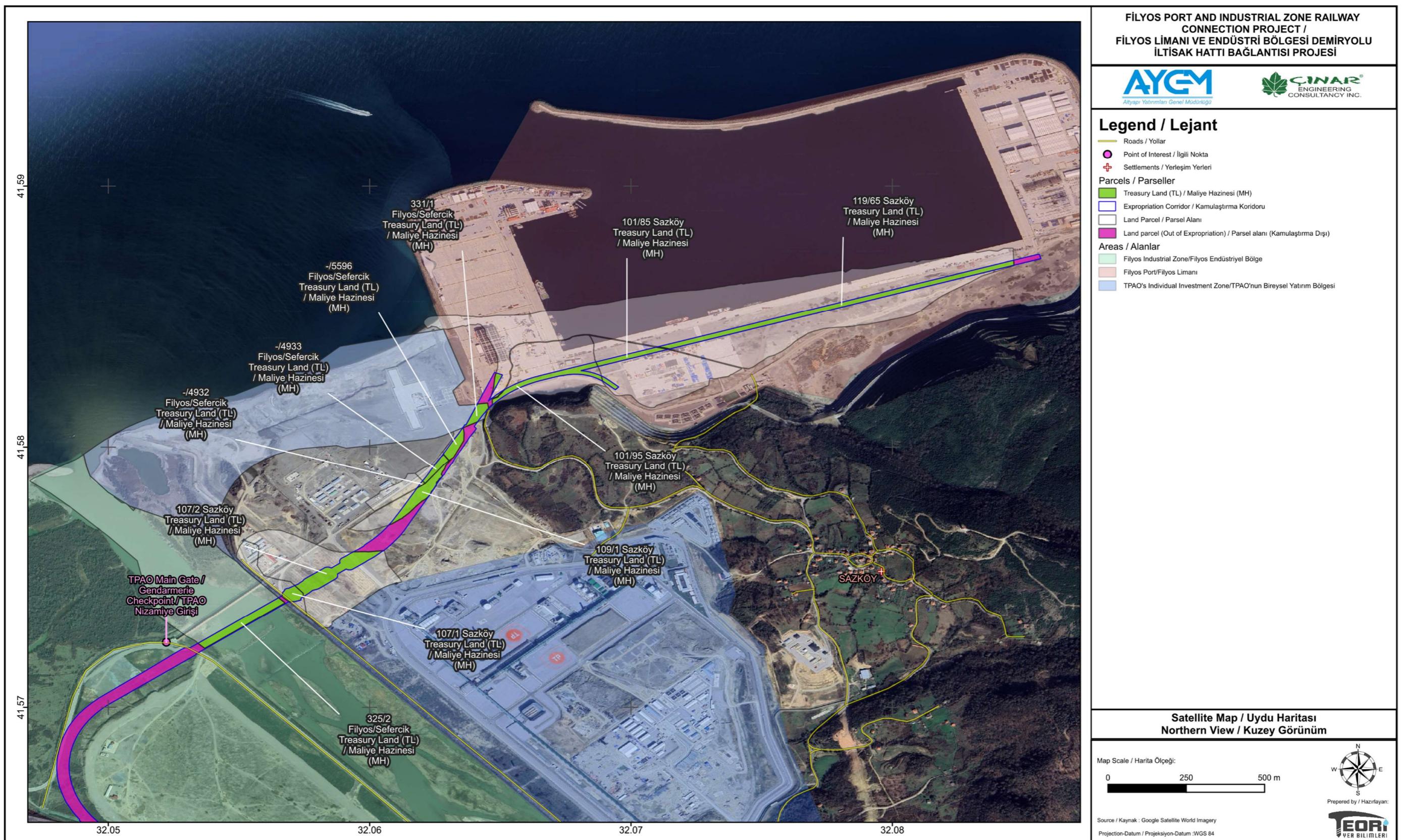


Figure 3-1. Filyos Sub-Project Railway Design in Phase-2 - General View



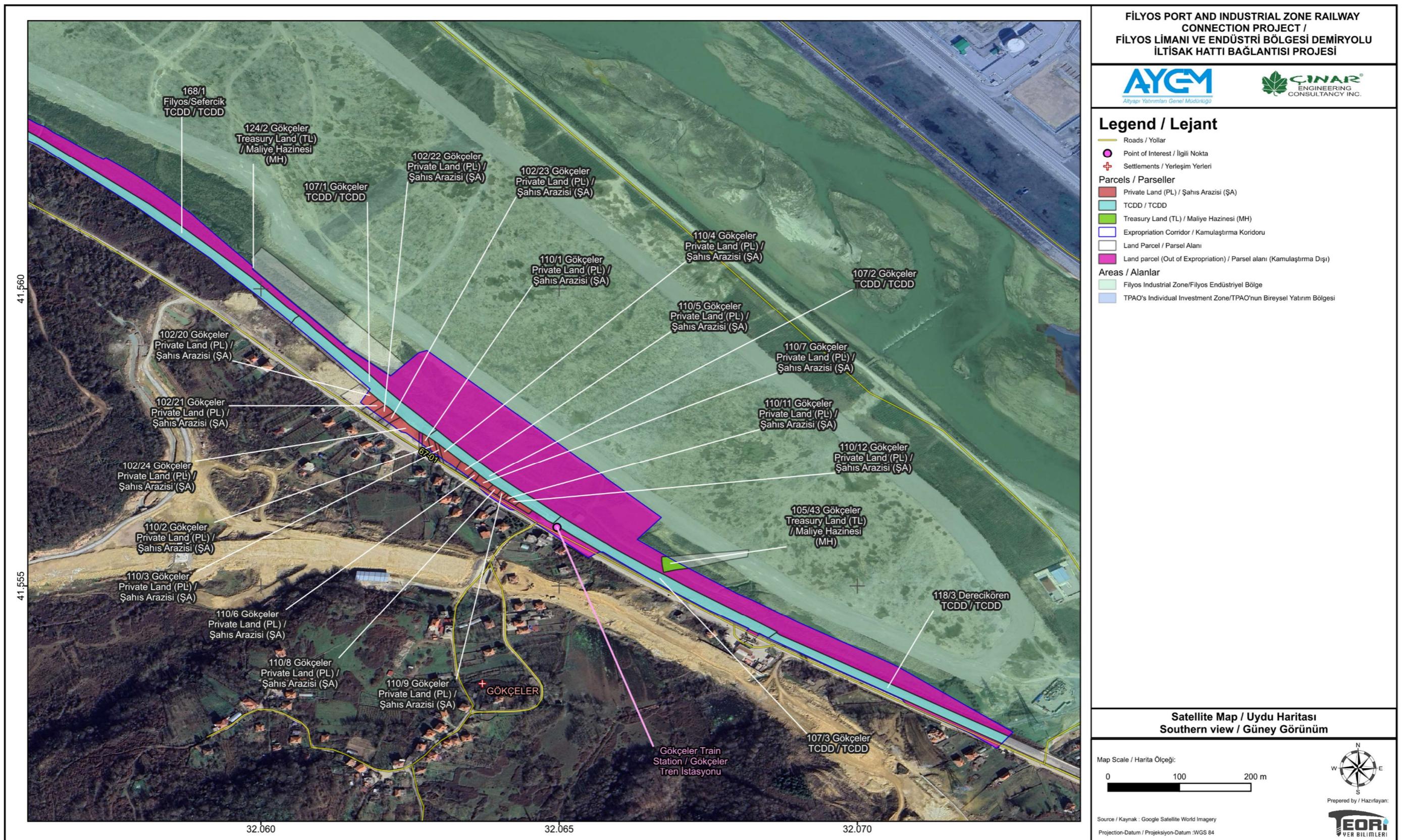


Figure 3-3: Filyos Sub-Project Railway Design in Phase-2 - Southern View

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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. Therefore, 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;

Determining with which parcel boundaries the expropriation limit coincides;

1. Letter of data request from the Cadaster Directorate to which the expropriation area belongs
2. Obtaining the required maps from the Cadaster Directorate and reaching agreement on the finalized cadastral data
3. Identification of immovable properties corresponding to expropriation from cadastral data
4. 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 Computer-Aided Design (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 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
 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

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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. Determination of the quality and quantity of the land and the elements on it such as structure, tree, product etc. with the expert or detection commission
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
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 3-4.

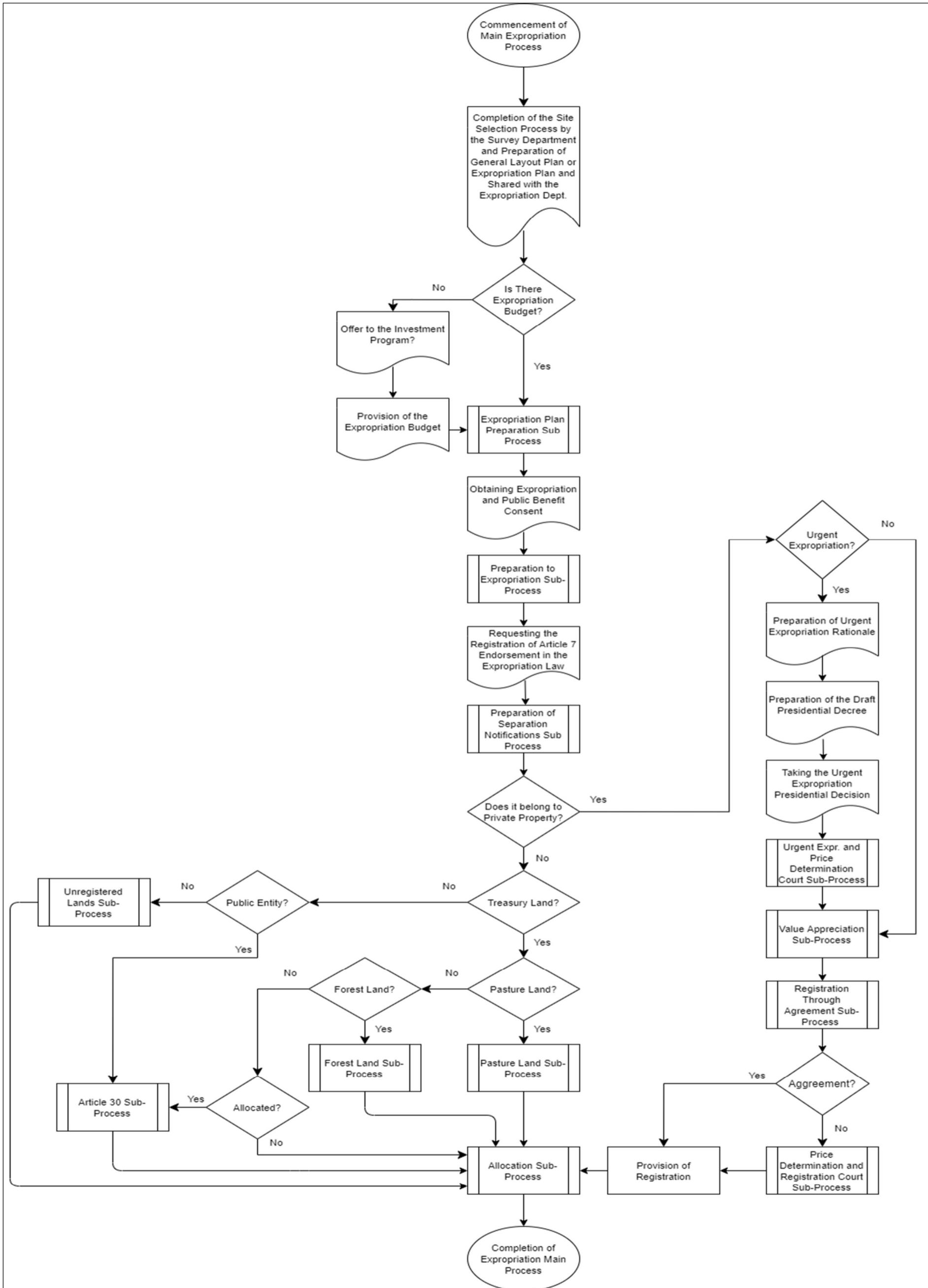


Figure 3-4. DGII Land Expropriation Flow Chart

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This process has been carried out in accordance with national legislation, and the identification of both formal and informal users of public lands has been completed. Surveys for all areas classified as public parcels were conducted through multiple sources (muhtars of Derekören, Gökçeler, and Sefercik, Filyos Municipality, Çaycuma District Governorate, Zonguldak Provincial Special Administration, and local people living in Derekören, Gökçeler, and Sefercik); however, no users were identified in these areas.

The valuation study has been completed in draft form. In the study, assessments were conducted for structures and ancillary facilities located directly on the parcels, and consultations were held with the land owners/users. For land owners/users who at the time were not available in the Area of Influence (AoI), meetings were conducted with their relatives. These consultations were carried out to bridge gaps between national and international regulations and to reach all legitimate rights holders.

The research results will provide the Valuation Commission with ready and usable information, particularly for the objective determination of full and partial expropriation values of the lands. They can serve as data for judicial and decision-making bodies in determining expropriation values, offering guidance and support. In addition, the research results are expected to have a positive impact on expert appraisers in the provinces and districts within the study area, helping to determine expropriation values accurately and correct common errors.

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. In accordance with national legislation, the valuation and expropriation timetable is determined by the DGII's Real Estate and Expropriation Department. The expropriation and compensation process is expected to start in the first quarter of 2026, and the exact dates for completion of valuation and initiation of compensation payments will be communicated once officially finalized.

Once the official valuation results and the expropriation timetable are finalized and formally communicated by the DGII Real Estate and Expropriation Department, this information will be incorporated into the relevant RP Addendum(s) prior to the implementation of land acquisition activities. The DGII PIU will be responsible for overseeing and coordinating the implementation of the expropriation and compensation process in accordance with the applicable legal framework and ESS5 requirements, ensuring that compensation is fully paid before land take and access to land is restricted.

The detailed budget will be prepared during the implementation phase by the DGII PIU, in accordance with the principles set out in Section 9 of this RP, and will be included in the RP Addendum prior to the commencement of any civil works.

During field visits, interviews were held with landowners and mukhtars 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 3-3.

Table 3-3. Land Rights Required by Project Components

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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

Permanent 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).

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 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, according 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 Industry and Technology (MoIT), 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, 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

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- 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 MoEUCC) 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, or a trust account to be paid in three monthly periods in the event of disputed ownership to be paid to the person proving the ownership
- Market-based interest rates are charged for the value of the compensation if for any reason the 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. And any transaction costs will also be reimbursed by DGII for those vulnerable and with meager assets, or subject to expropriation of more than 10% of their land 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 studies 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:

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

Income Capitalization Criterion

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

Net income (yield)

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

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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, $So = s / f$
- The formula used for capitalizing perennial periodical fixed income is, $Po = p / qn-1$

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, the average capitalization interest rate will be calculated by dividing land yields by land sales prices (the same number of yields and land sales prices). Since land value and capitalization interest rate are in inverse proportion, land value will increase as capitalization interest rate decreases, provided that yield is stable. According to the Decision of Court of Appeals 18th Civil Panel, of July 01, 1993 No: 1993/262-531, capitalization interest rate ranges from 3% to 15% nationwide.

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

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

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

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

- Proximity to a city or town
- Proximity to access roads (land, railway, airport)
- Distance to healthcare services
- Favourable transportation conditions
- Buildings (if any) in good condition
- Undivided land
- Geometrically well-shaped land

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- 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
- Favourable 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 8 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 done in accordance with this assessment and valuation record. Owners/users will be compensated based on the market value of the crops on permanently acquired lands.

Valuation of trees is carried out 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.

Gardens with vegetables, fruit and non-fruit tree cultivation are 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 to public and/or private land and planted trees and crops (or built immovable assets) are compensated for these assets (but not for the land).

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

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3.5 Eliminating Valuation Gaps

This RP comprises the determination of compensation and compensation deductions which are not in compliance with ESS5 and including the gap in values in the RP budget. The expropriation and land valuation process has not been completed yet. For this reason, the compliance of compensation with ESS5 cannot yet be examined. Therefore, a principle estimated RP budget was prepared instead of a detailed parcel-based budget. The detailed budget will be prepared during the implementation phase by following the principles in this RP by DGII PIU according to principles in this RP.

DGII has gained experience in international standards by carrying out many IFI-supported projects in the last five years. It requests valuation in accordance with international standards from the valuation companies it receives services from⁴. However, when other DGII projects are examined, some incompatibilities between national valuation practices and international standards inherent in the existing Expropriation Law are detected. Based on other project experiences, these non-conformities, which must be paid from the RP fund can be expected to be as follows:

- 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 supports 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 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 field-based data collection was conducted through surveys on the site. Accordingly, the cut-off date will be clearly determined and announced when DGII's Real Estate and Expropriation department enters the field to carry out the asset inventory. For any additional land required after the construction contractor has finalized the alignment, the cut-off date for eligibility will be the date

⁴ 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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on which the asset inventory for the additionally affected lands is prepared. Such additional acquisition and compensation will be covered through an addendum(s) to this RP which will be prepared and submitted to the World Bank for review and approval prior to implementation.

The cut-off date will be publicly announced in connection with the census.

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 support 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 support, such as livelihood restoration measures, compensation for loss of structures, animal feed support, moving/relocation costs, and additional necessary support, 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 occupy the land before the entitlement cut-off date

Entitlement matrix and principles of this Resettlement Plan (RP) will also be applicable to the Associated Facilities. The addenda will be plans for expropriation and compensation related to any the additional lands.

3.8 Status of other components and project revisions

This RP covers all lands affected by the main components of the project and will also apply to any Associated Facilities. Should there be any changes to the project route, additional studies may be required. If any Associated Facilities are identified at a later stage, they will be defined and addressed in an RP Addendum(s).

The location and technical specifications of the Project components such as construction/camp sites, ETLs, quarry and material borrow pits are yet to be determined. Therefore, the impacts caused by ETLs, quarries, material burrow pits and construction camp sites are not included in this RP. As the construction is foreseen to start in the first half of 2026, it is necessary that an Addendum to RP be carried out by DGII with the finalization of the locations of these project components and the preparation of expropriation documents by mid-2026. The resettlement issues resulting from the undefined project components will be addressed with one or more addenda to this RP, in line with the procedures, standards, and entitlement matrix given in this document. Following the identification of additional land requirements for each component, an assessment will be conducted to determine whether such requirements may result in physical and/or economic displacement. For this purpose, the following activities will be carried out: (a) verification of land ownership and land use, (b) preparation of asset inventories, (c) establishment of eligibility and entitlement criteria, (d) identification of landowners, shareholders, and formal and/or informal users on privately owned parcels, and (e)

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identification of formal and/or informal users on public land. As previously indicated, these activities are addenda to the ongoing land acquisition processes.

The World Bank's ESF, specifically Environmental and Social Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) and ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement), require comprehensive stakeholder engagement and due diligence with all relevant governmental agencies to identify and mitigate environmental and social risks. These standards emphasize the need to involve authorities responsible for cultural heritage, land and forestry management, and water resources when projects may impact such areas.

Therefore, the preliminary identification of cultural heritage, land and forestry management, and water resources authorities reflects compliance with both national legal obligations and international best practices under the World Bank ESF. 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 was conducted to plan the economic resettlement caused by the land acquisition requirements of the project. The scope of this RP covers 36 parcels located within the AoI. Land acquisition requirements are expected to result in the following land-based impacts:

- Loss of immovable and fixed assets on the TCDD land,
- Loss of movable assets on the private lands, and
- Loss of vegetable gardens, fruit, and non-fruit trees.

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 under both components include field-based data collection activities carried out with the registered land users and representatives of Project Affected Households (PAHs) who could be reached during the RP field study. These activities included the administration of questionnaires and semi-structured interviews and were undertaken for the purpose of identifying potential physical and economic resettlement impacts associated with land acquisition. The official Asset Inventory will be conducted as part of the expropriation process, and the relevant RP Addendum(s) will be prepared, finalized, disclosed, consulted upon, cleared by the World Bank, and implemented prior to the commencement of civil works, in accordance with RP requirements. Draft Asset Inventory for all affected lands due to the Project's land requirement;

- Field-based data collection was conducted through surveys with representatives of (PAHs).
- Draft Valuation and Land Identification studies,
- In-depth interviews with local residents, and mukhtars of Derekören, Gökçeler, and Sefercik villages,
- In-depth interviews with the officials from relevant units of Filyos Municipality, Çaycuma District Governorship, and Zonguldak Provincial Special Administration.

4.1 RP Preparation Field Studies

4.1.1 Phase 2 studies- February 2025

Following the redefinition of the project alignment in Phase 2, the settlements of Gökçeler, Derekören, Sazköy and Sefercik have been determined as being within the AoI. The first field study for preparation of the RP was carried out on 4-5 February 2025. The scope of the planned field study was to identify Project Affected Persons (PAPs) who could be reached during fieldwork and to identify affected land parcels within the Project area. Since half of the 36 parcels are public lands owned by TCDD and the Treasury, meetings were also held with the relevant institutions to collect information about these lands and their users. Before the RP field study, the surveyors were trained in data collection tools and the Project.

Some of the landowners and users were reached through the mukhtars of four settlements affected by the land acquisition requirements of the project. Information on the socio-economic profiles of the owners and users of 12 affected private parcels was obtained through household surveys, covering 43 shareholders owning the parcels. As of February 2025, no representative of the remaining 6 private parcel owners (including the sole owner of the parcel currently under court proceedings), covering a total of 59 shareholders, has been reached.

18 of the 36 parcels are owned by TCDD and the Treasury. To obtain information about these lands and their usage, meetings were held with four village muhtars, Filyos Municipality, and

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the National Real Estate Department under the Çaycuma District Governorship. Data was collected for 16 parcels. However, as of February, it was confirmed that there were no users on these lands. Another important point regarding their use is that most of these parcels are located within the TPAO area. A meeting was requested with TPAO, but the institution declined the request.

No data could be obtained for the two parcels owned by the Treasury (including the parcel currently under litigation).

4.1.2 Phase 2 studies- September 2025

The general purpose of the RP studies conducted in September was as follows:

- To complete the Draft Asset Inventory and Valuation studies that were missing in February 2025,
- To provide a basis for valuation and budget,
- To identify all eligible people and develop the entitlement matrix,
- To physically visit all parcels in order to reassess the areas that could not be accessed in February 2025 due to seasonal conditions and that were covered with snow,
- To include in the RP study the PAHs who could not be reached in February 2025,
- To identify other PAPs with shareholder status in the parcels, together with those identified as the land users,
- To verify the data collected regarding the status of the lands owned by TCDD and the Treasury and their actual users,
- To repeat consultations for the parcels owned by the Treasury for which no data could previously be obtained,
- To conduct additional meetings with TPAO and the Zonguldak Provincial Special Administration to collect more detailed data.

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 (vegetable garden, fruit and non-fruit trees, structures, 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. However, no informal users were identified during the studies conducted in either February 2025 or September 2025.

Accordingly, the RP surveys conducted in 2025 (both February and September) for the current socio-economic baseline of the RP were based on the following numbers (see Table 4-1).

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Table 4-1. Numbers of household surveys

Settlement	Private Lands				Public Lands					
					Treasury Lands			TCDD land		
	# of parcels owned by real person	# of parcels owned by legal entities	# of owners	# of Household survey	# of parcel owned by Treasury	# of Treasury land users identified	# of Household survey with users of treasury lands	# of parcel owned by TCDD	# of TCDD land users identified	# of Household survey with users of TCDD lands
Gökçeler	18 ⁵	0	102	14	2 ⁶	0	0	3	0	0
Sazköy	0	0	0	0	6	0	0	0	0	0
Sefercik	0	0	0	0	5	0	0	1	0	0
Derecikören	0	0	0	0	0	0	0	1	0	0
Total	18	0	102	14	13	0	0	5	0	0

Owners/users of private lands and users were identified (see also Appendix-1).

Privately-owned parcels (18 plots)

A total of 18 privately-owned land parcels will be affected by the Project. 102 shareholders were identified as having ownership rights to these 18 parcels. Among these 102 shareholders, 14 were determined to be either the actual users of the relevant private lands or first-degree relatives of the actual users within the PAH. In addition, one of the 102 shareholders is the sole owner of a parcel (Gökçeler village, 110/13) currently subject to ongoing litigation. The landowner is deceased, and the contacted heir (son) has explicitly refused to participate in the consultation.

During the RP field studies conducted in February and September 2025, all parcels were physically identified, and information regarding owners and users was collected.

For these 18 parcels, 14 abovementioned the land users were identified across 17 parcels, and all were successfully engaged with. Their opinions on the Project's land acquisition impacts were gathered through face-to-face and telephone interviews.

During the process of identifying landowners and users, support was gathered from both the village mukhtar and respected elders of the community to the greatest extent possible. In particular, information on landowners who had migrated from the village and permanently reside elsewhere, as well as on deceased owners, was obtained through these efforts.

Despite these verification efforts, it was observed that neither the muhtar nor the community elders had any knowledge of, or were able to provide information on, certain shareholders.

The fieldwork carried out for the preparation of the Resettlement Plan consists of two steps: (1) administration of the questionnaire aimed at collecting information about the landowner and/or user (RP questionnaire), and (2) administration of the questionnaire aimed at collecting information about the household of the landowner and/or user (household questionnaire). These two steps are referred to as RP Field study (see Appendix 9-1 and Appendix 9-2).

The RP questionnaire targets registered landowners and/or land users directly affected by land acquisition and focuses on collecting parcel-specific information such as land tenure status, land use, crop production, and economic impacts related to the affected land. Where

⁵ Total number, including private parcel under ongoing court proceedings

⁶ Total number, including the Treasury parcel under ongoing court proceedings

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applicable, information under this questionnaire was obtained directly from the land users. The household questionnaire, on the other hand, targets representatives of Project Affected Households (PAHs) and focuses on collecting socio-economic and demographic information at the household level, including household composition, income sources, and vulnerability-related indicators. In cases where the registered land user could not be reached during the fieldwork period, certain socio-economic information was obtained from household representatives and is treated as second-hand information in the analysis.

The “RP field study” for the Filyos Project was conducted to assess the physical and economic resettlement impacts arising from land acquisition. This study collected parcel-level information directly from registered landowners and land users, providing a clear record of affected lands and their owners. In addition, household-level surveys were conducted with representatives of Project Affected Households (PAHs) to gather socio-economic data on all household members affected by land acquisition. While a parcel may be registered under a single individual, the household survey ensures that impacts on all affected household members are captured, which is essential for the preparation of livelihood restoration plans. For consistency and to avoid confusion, both surveys are listed in the table as part of the RP field study. In Table 4-2, participation in the RP field study is marked as “Done” for PAH representatives who took part in either or both components of the study. Participation reflects engagement with either the parcel-level assessment, the household survey, or both.

Table 4-2. Private parcels⁷

# ⁸	Settlement	Locality	Block / Parcel	Type ⁹	# of shareholder	RP field study/PAH	Draft Asset Inventory
1.	Gökçeler	Dikilitaş	102/20	Field	2	Done	Done
2.	Gökçeler	Dikilitaş	102/21	Field	9	Done	Done
3.	Gökçeler	Dikilitaş	102/22	Field	1	Done	Done
4.	Gökçeler	Dikilitaş	102/23	Garden	1	Done	Done
5.	Gökçeler	Dikilitaş	102/24	Garden	2	Done	Done
6.	Gökçeler	Dikilitaş	110/1	Garden	19	Done	Done
7.	Gökçeler	Dikilitaş	110/2	Garden	20	Done	Done
8.	Gökçeler	Dikilitaş	110/3	Garden	3	Done	Done
9.	Gökçeler	Dikilitaş	110/4	Garden	22	Done	Done
10.	Gökçeler	Dikilitaş	110/5	Garden	1	Done	Done
11.	Gökçeler	Dikilitaş	110/6	Garden	9	Done	Done
12.	Gökçeler	Dikilitaş	110/7	Garden	1	Done	Done
13.	Gökçeler	Dikilitaş	110/8	Garden	1	Done	Done
14.	Gökçeler	Dikilitaş	110/9	Garden	32	Done	Done

⁷ “RP field study” marked as “Done” indicates participation in either or both components of the field study. Where available, parcel-level information was collected directly from registered land users; otherwise, socio-economic information was obtained from PAH representatives and treated as second-hand data.

⁸ The ranking is independent of the expropriation plan. See Appendix-1 for the ranking provided by the institution.

⁹ An explanation for “Type”, as presented in the table, has been provided in the Glossary sections.

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# ⁸	Settlement	Locality	Block / Parcel	Type ⁹	# of shareholder	RP field study/PAH	Draft Asset Inventory
15.	Gökçeler	Dikilitaş	110/10	Garden	9	Done	Done
16.	Gökçeler	Dikilitaş	110/11	Garden	6	Done	Done
17.	Gökçeler	Dikilitaş	110/12	Garden	9	Done	Done
18.	Gökçeler	Dikilitaş	110/13	Garden	1 / Legal dispute	Not yet	Done

Distribution of the parcels owned by TCDD, and Treasury are given in Table 4-3. Details of the parcels are provided in Appendix-1, Figure 3-1, Figure 3-2, and Figure 3-3, too.

Table 4-3. Public Lands

#	Settlement	Locality	Block / Parcel	Location (Inside / Outside TPAO boundaries)	Type	Owned by	Asset Inventory
1.	Gökçeler	Gökçeler düzü	105/43	Outside the boundaries of TPAO	Field	Treasury	No
2.	Gökçeler	<i>No locality name</i>	124/2	Outside the boundaries of TPAO	Health Protection	Treasury	No
3.	Sazköy	Ada	109/1	Within the boundaries of TPAO	Bushland	Treasury	No
4.	Sazköy	Denizkenarı	101/85	Within the boundaries of TPAO	Raw land and bushland	Treasury	No
5.	Sazköy	Gölkenarı	101/95	Within the boundaries of TPAO	Raw land	Treasury	No
6.	Sazköy	Kum	119/65	Within the boundaries of TPAO	Sandy area	Treasury	No
7.	Sazköy	Muratlar	107/1	Within the boundaries of TPAO	Wasteland (vacant area)	Treasury	No
8.	Sazköy	Muratlar	107/2	Within the boundaries of TPAO	Wasteland (vacant area)	Treasury	No
9.	Sefercik	Ada öte karşı	- ¹⁰ (0) /4932	Within the boundaries of TPAO	Garden	Treasury	No
10.	Sefercik	Ada öte karşı	- (0) /4933	Within the boundaries of TPAO	Garden	Treasury	No

¹⁰ There are parcels without block numbers. These are indicated with a '-' in the official list. However, in many practices, the use of '0' for empty block numbers is common. To reflect both formats, they have been presented within the column.

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#	Settlement	Locality	Block / Parcel	Location (Inside / Outside TPAO boundaries)	Type	Owned by	Asset Inventory
11.	Sefercik	Ada öte karşı	- (0) /5596	Within the boundaries of TPAO	Garden	Treasury	No
12.	Sefercik	<i>No locality name</i>	325/2	Within the boundaries of TPAO	Filyos river	Treasury	No
13.	Sefercik	<i>No locality name</i>	331/1	Within the boundaries of TPAO	Floodplain	Treasury	No
14.	Gökçeler	Dikilitaş	107/1	Outside the boundaries of TPAO	Field	TCDD	Yes
15.	Gökçeler	Dikilitaş	107/2	Outside the boundaries of TPAO	Railway	TCDD	Yes
16.	Gökçeler	Dikilitaş	107/3	Outside the boundaries of TPAO	Field and road	TCDD	Yes
17.	Sefercik	Kavak yanı	168/1	Outside the boundaries of TPAO	Railway and ancillary structures	TCDD	Yes
18.	Derekören	Darılık	118/3	Outside the boundaries of TPAO	Field and road	TCDD	Yes

Public lands within the boundaries of TPAO (11 Treasury owned plots);

Out of the 36 parcels, 18 are publicly owned. Of these, 13 parcels belong to the Treasury and 5 to TCDD. 11 of the 13 Treasury parcels are located within the TPAO boundaries, and are not in registered use no private user (conducted by real persons) has been identified on these lands. Furthermore, due to the 11 Treasury parcels being located within the TPAO private security zone, on-site physical inspections, asset inventory studies, and photographic documentation showing the current condition of the lands could not be conducted in these areas. As a result, it can be stated with certainty that there is no private use by real persons on these 11 Treasury parcels which are located within the TPAO boundaries. However, since Asset Inventory and valuation assessments could not be conducted on these lands, they were necessarily excluded from these assessments.

Distribution of the public lands within the boundaries of TPAO is given in Table 4-4. Details of the parcels are provided in Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3, too.

Table 4-4. Public lands within the boundaries of TPAO (11 Treasury owned plots)

#	Settlement	Locality	Block / Parcel	Type	Owned by	Asset Inventory
1.	Sazköy	Ada	109/1	Bushland	Treasury	No
2.	Sazköy	Denizkenarı	101/85	Raw land and bushland	Treasury	No

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#	Settlement	Locality	Block / Parcel	Type	Owned by	Asset Inventory
3.	Sazköy	Gölkenarı	101/95	Raw land	Treasury	No
4.	Sazköy	Kum	119/65	Sandy area	Treasury	No
5.	Sazköy	Muratlar	107/1	Wasteland (vacant area)	Treasury	No
6.	Sazköy	Muratlar	107/2	Wasteland (vacant area)	Treasury	No
7.	Sefercik	Ada öte karşı	- /4932	Garden	Treasury	No
8.	Sefercik	Ada öte karşı	- /4933	Garden	Treasury	No
9.	Sefercik	Ada öte karşı	- /5596	Garden	Treasury	No
10.	Sefercik	No locality name	325/2	Filyos river	Treasury	No
11.	Sefercik	No locality name	331/1	Floodplain	Treasury	No

Public lands located outside the boundaries of TPAO (Treasury parcels (2 plots) + TCDD parcels (5 plots)=(7 plots));

Distribution of the public lands located outside the boundaries of TPAO is given in Table 4-5. Details of the parcels are provided in Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3, too.

Table 4-5. Public lands located outside the boundaries of TPAO

#	Settlement	Locality	Block / Parcel	Type	Owned by	Asset Inventory
1.	Gökçeler	Gökçeler düzü	105/43	Field	Treasury	No
2.	Gökçeler	No locality name	124/2	Health Protection	Treasury	No
3.	Gökçeler	Dikilitaş	107/1	Field	TCDD	Yes
4.	Gökçeler	Dikilitaş	107/2	Railway	TCDD	Yes
5.	Gökçeler	Dikilitaş	107/3	Field and road	TCDD	Yes
6.	Sefercik	Kavak yanı	168/1	Railway and ancillary structures	TCDD	Yes
7.	Derecikören	Darılık	118/3	Field and road	TCDD	Yes

Treasury parcels (2 plots) (Outside of TPAO) A detailed screening was conducted to identify the use of the remaining 2 Treasury parcels outside TPAO boundaries, as well as the 5 TCDD parcels.

Both of the 2 Treasury parcels are located within the boundaries of Gökçeler Village; however, due to terrain and vegetation conditions, physical access to these parcels was not possible. Consequently, on-site inspections and photographic documentation reflecting the current condition of these areas could not be conducted.

Based on observations conducted in September 2025, the likelihood of any usage on these 2 Treasury parcels is considered very low. There is no access road to these 2 Treasury parcels. The 2 Treasury parcels are surrounded by dense vegetation to the south, north, and west,

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while the eastern boundaries are defined by the Filyos River. These field observations were further confirmed during consultations with mukhtars, local residents, and the institutions¹¹.

- *Treasury-owned parcel-1 124/2, Gökçeler village*: According to official land registry records, this parcel is classified as a “health protection zone¹²”. The total area of the parcel is 10,891.03 m², and the planned land acquisition amounts to 5.44 m², representing less than 1%¹³ (0.05) of the total parcel area.

Treasury-owned parcel-2 105/43, Gökçeler village: According to official land registry records, this parcel is classified as a “Field”. The total area of the parcel is 2,559.08 m², and the planned land acquisition amounts to 620.18 m², representing 24% of the total parcel area. This parcel is recorded as being owned by the Treasury. Tax identification numbers (Tax ID or VKN) for both the Treasury and the defendant party¹⁴ are available through the Directorate of Revenue Administration (GİB); however, access to this information is restricted to authorized institutions. Consequently, no screening could be conducted for the defendant party, and no information regarding the ongoing litigation could be obtained. Furthermore, consultations with the relevant institutions did not yield any informal information on the land or its litigation status.

TCDD parcels (5 plots) (Outside of TPAO), These five parcels start with 118/13 (Derekören) in the south, continue northward with 107/3, 107/2, and 107/1 (Gökçeler), and end with 168/1 (Sefercik). There are 18 privately owned parcels located between 107/1 and 168/1. Five TCDD parcels are entirely owned by TCDD and are largely allocated for railway lines, station buildings, and other related structures under TCDD.

A summary Table 4-6 has been prepared showing the location of all public and privately owned parcels subject to land acquisition with respect to TPAO boundaries.

Table 4-6. Summary Table: Location of all lands with respect to TPAO boundaries

Type	Treasury lands	TCDD lands	Total Public Land	Type	Total Private Land	GRAND TOTAL
Public lands located outside the boundaries of TPAO	2	5	7	Private lands located outside the boundaries of TPAO	18	25
Public lands within the boundaries of TPAO	11	0	11	Private lands within the boundaries of TPAO	0	11
Total Public Land	13	5	18	Total Private Land	18	36

¹¹ Filyos Town Municipality, Çaycuma District Governorate, and Zonguldak Provincial Special Administration

¹² Health Protection: This land, owned by the Treasury, is designated as a health protection area. The decision is made by the officials of the General Directorate of Public Health. Such areas are generally associated with natural resources and are designated to implement measures aimed at preventing pollution.

¹³ The percentage of the planned land acquisition (m²) is calculated by multiplying the planned acquisition area by 100 and dividing by the total parcel area (m²).

Example calculation: $(5.44 \text{ m}^2 \times 100) \div 10,891.03 \text{ m}^2 = 0.05 \%$

¹⁴ No information is available regarding the identity of the party initiating the litigation. It is assumed that the initiating party may be another public institution; however, this could not be confirmed.

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4.2 Sampling Strategy

The sampling strategy for surveys is presented in Table 4-7. Muhtars of all affected settlements were interviewed. In these interviews, both community level information was obtained, and land users (formal and informal) were identified. According to this research, there is no formal and informal land use of public lands. Users of all affected private lands were identified and recorded in Appendix-1, too.

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Table 4-7: Identification of Project Affected Persons Surveyed During Fieldwork¹⁵

Survey Instrument	Survey Coverage	Implementation Notes
Community level survey (CLS)	The settlement heads in 4 settlements (based on the available expropriation data)	Semi-structured community level questionnaires with the 4 mukhtars in the affected settlements (Derekören, Sefercik, Sazköy and Gökçeler) have been conducted.
RP Questionnaire and Household Questionnaire (RP field study)	A total of 18 private land parcels are affected, involving 14 identified land users (individuals or PAH representatives).	No information could be obtained for a privately owned parcel under litigation, and no consultation could be conducted with any user of this parcel.
Registered users and owners / shareholders	<p>The affected private parcels involve 14 land users, who are defined as Project Affected Persons (PAPs), as they are directly impacted by land acquisition.</p> <p>RP Field Study (comprising the RP Questionnaire and the Household Questionnaire) were applied to these 14 individuals who are the land users of the 18 private lands.</p> <p>Due to the very limited land use and low income-generating potential of the affected private parcels, the scope of the RP field study and the associated data collection activities remained limited.</p> <p>See also Asset Inventory.</p> <ul style="list-style-type: none"> - All the shareholders have been identified via in-depth interview with mukhtars and community leaders. - Interviews were completed with all 14 identified land users. 	<p>The current status of the 102 shareholders surveyed is as follows:</p> <ul style="list-style-type: none"> - 23 shareholders are deceased, therefore, the heirs to be legally determined in the future will be considered as PAPs. - 61 shareholders reside permanently outside the village, - No information could be obtained for 4 shareholders, - The remaining 14 individuals are registered as having their regular address in the village.

¹⁵ Surveys were conducted based on the actual availability and participation of land users and PAH representatives during fieldwork, rather than through a sampling methodology.

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Table 4-8. Summary of RP field survey for private parcels

Settlement	Total Number of Affected Private Parcels	Total Number of Owners / Shareholders in the Affected Private Parcels (PAPs including PAH)	Number of interviewed PAH representatives	Population of PAHs Experiencing Potential Physical and Economic Resettlement Impacts ¹⁶
Gökçeler	18	102	14	34 ¹⁷

Table 4-9. Summary of RP field survey for Treasury and TCDD parcels

Settlement	Total Number of Affected Treasury Parcels	Number of Treasury Parcels Assessed for Potential Physical and Economic Resettlement Impacts	Total Number of Affected TCDD's Parcels
Gökçeler	2	2	3
Sazköy	6	6	0
Sefercik	5	5	1
Derecikören	0	0	1
Total	13	13	5

¹⁶ The information presented in this table is based on the RP field study conducted during the preparation of this RP and reflects data collected from land users and PAH representatives who could be reached during fieldwork. Potential impacts on other shareholders who were not reached during the field study will be identified and addressed, as applicable, through the preparation of relevant RP Addendum(s), in accordance with RP requirements.

¹⁷ Although interviews were conducted with 14 individuals, the total figure reflects the cumulative number of persons residing within those households.

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4.3 Data Collection Tools

The fieldwork carried out for the preparation of the Resettlement Plan consists of two steps: (1) administration of the questionnaire aimed at collecting information about the landowner and/or land user (RP questionnaire), and (2) administration of the questionnaire aimed at collecting information about the household representative of the Project Affected Household (PAH) (household questionnaire). These two steps are referred to as RP Field study (see Appendix 9-1 and Appendix 9-2). The RP questionnaire was administered primarily to registered landowners and/or land users directly affected by land acquisition and focused on parcel-level information related to land tenure, land use, and economic impacts. The household questionnaire, on the other hand, targeted PAH representatives and focused on collecting socio-economic and demographic information at the household level.

The “*RP field study*” for the Filyos Project was conducted to assess the physical and economic resettlement impacts arising from land acquisition. The *RP field study* involved consultations with landowners and/or land users (representatives of the PAH) through the *RP field study* process. The *RP questionnaire* primarily aims to collect information related to the private lands affected by acquisition. The representatives of the PAH were also surveyed using a *household questionnaire*, which focused on gathering information regarding PAHs.

A digital data collection infrastructure was employed for the two questionnaires, using an electronic form platform (Google Forms). This setup enables the direct capture and storage of responses into a centralized database (Google Sheets) during face-to-face field interviews, ensuring real-time data entry. The questions were posed face-to-face to the participants by the social researcher, and the participants’ responses were recorded by the same researcher (by Google Forms) and submitted directly to the database (Google Sheets).

In addition, a separate questionnaire was developed specifically for interviews with the mukhtars. Besides, unstructured in-depth interviews were conducted to collect information on shareholders’ data and the use of public parcels. These interviews primarily involved mukhtars, local opinion leaders (especially elders), and officials from relevant public institutions.

4.4 Draft Asset Inventory and Census

During the RP preparation studies in September 2025 an effort was made to prepare an Asset Inventory and field-based data collection was conducted through surveys with representatives of PAHs in accordance with ESS5 (see also Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3, too).

The valuation study has been completed in draft form. In the study, assessments were conducted for structures and ancillary facilities located directly on the parcels, and consultations were held with the actual users. For actual users who were not available in the AoI, meetings were conducted with their relatives. These consultations were carried out to bridge gaps between national and international regulations and to reach the legitimate rights holders.

The research results will provide the Valuation Commission with ready and usable information, particularly for the objective determination of full and partial expropriation values of the lands. They can serve as data for judicial and decision-making bodies in determining expropriation values, offering guidance and support. In addition, the research results are expected to have a positive impact on expert appraisers in the provinces and districts within the study area, helping to determine expropriation values accurately and correct common errors.

An additional study was conducted in September 2025 to address incomplete interviews and unidentified shareholders from February 2025. Information on all shareholders was collected

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during this study. However, it was determined that it was not possible to reach all shareholders. There are no suitable conditions to conduct a full census. Consequently, shareholders who are permanent residents of the village are considered the land users of the privately-owned land subject to expropriation. For 18 private parcels, a total of 14 PAH representatives were interviewed as the land users. The interviewed individuals are both the land users of the land subject to expropriation and either the landowners themselves or first-degree relatives of the landowners (spouse/son/daughter).

The data obtained from these interviews were assessed in the context of the physical and economic resettlement impacts arising from the Project's land acquisition. According to the interview findings presented in subsequent sections, the remaining shareholders - due to not residing permanently in the village, having entirely migrated, or being deceased - were not directly reached during the RP field survey. Therefore, the assessment presented in this RP is based on limited fieldwork and available consultations. Based on available observations and consultations with local residents, it is expected that these absent PAPs are unlikely to experience significant economic impact from the land acquisition. However, the amount of land potentially lost by each PAP has not yet been calculated, and no actual data is available for the affected group of absent PAPs. However, a precise assessment of the land potentially lost by these absent PAPs could provide further substantiation. Accordingly, the actual physical and economic resettlement impacts on these absent PAPs cannot be conclusively determined at this stage and will be clearly identified and addressed through the preparation of the relevant RP Addendum(s), based on the official Asset Inventory studies, in line with RP requirements. Moreover, the land users do not use the land directly as a primary source of livelihood; the produce is either consumed within the household or the land is left entirely fallow.

This is related to the small size of the parcels and their location within the narrow corridor between the railway and the highway. Parcels that could not be assessed during winter (February 2025) due to snow cover were re-visited in September 2025 and were observed to be nearly vacant, fallow, or covered with products (vegetables, fruit, and non-fruit trees) of low economic value. Additionally, some structures reflected in the Asset Inventory (see also Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3, too) were found to have no significant economic use and were almost entirely abandoned.

Independently of these data, all shareholders (including deceased individuals) were assessed based on the proportion of expropriated land relative to their total land holdings, and vulnerability status was determined for those experiencing losses exceeding 10%.

4.5 Limitations for RP Study

The number of permanent households living in the village increases especially during the summer and religious holidays, due to the arrivals of households that do not live permanently in the village but continue to have ties with the village and use their houses in the village as "summer houses". The date of the research, February, 2025, coincides with the period when these households, who continue to have ties with the village but do not live in the village, were not in the village. This situation prevented access to land owners and users with whom face-to-face interviews were planned. Consequently, the field was revisited in September 2025, and the incomplete interviews were completed.

Although this limitation was largely addressed through the additional fieldwork conducted in September 2025, notable local social conflicts among the local population regarding public projects and land acquisition processes persist. For example, an interview regarding a parcel under ongoing litigation was categorically refused by the first-degree relative (son) of the deceased landowner. For another parcel, although no litigation was ongoing, the interviewee indicated that a legal case concerning the parcel was still active and that they could not provide statements without legal representation. These legal proceedings were reported to be related

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to expropriation activities carried out for public projects, although no definitive information was provided.

The cumulative impact of the existing highway (67-01), railway, ongoing tunnel construction, TPAO, the free zone, Filyos Port, and OSB area has reinforced negative perceptions regarding public projects and land acquisition processes. The fact that many users leave their land fallow is also related to these experiences. Past expropriations that resulted in reduced parcel sizes, compensation set below market value, and delayed payments have weakened the connection between landowners and their land.

The presence of multiple other projects in the area, coupled with the fact that this project has been repeatedly raised but not yet implemented, has shaped the responses of the local population.

Difficulties related to full census

A total of 102 landowners have been identified across 18 private parcels. Findings regarding each landowner, compiled from interviews with the village mukhtar and local opinion leaders, are presented in Table 4-10. As indicated in these findings;

- 23 individuals are deceased, therefore, the heirs to be legally determined in the future will be considered as PAPs.
- 61 individuals reside permanently outside the village,
- No information could be obtained for 4 individuals.
- The remaining 14 individuals are registered as having their regular address in the village.

When compiling the list of unique individuals, an ascending order based on unique Türkiye National Identification Number (TR ID) was applied, and each individual was assigned a new Identity Number (ID). These ID details are presented in Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3. alongside the actual information but have been anonymized in the documents to be published in accordance with the Personal Data Protection Law (KVKK).

In light of this information, the limitations regarding the full census are elaborated in the following subsections.

Shareholders identified as deceased

During the interviews, it was reported that some shareholders were deceased. This information is based solely on the statements of the mukhtar and village residents and does not include any official records. Since inheritance procedures have not been completed for the deceased shareholders, the exact number of landowners on the parcels remains uncertain. These uncertainties can only be resolved through official address verification procedures to be carried out during the expropriation process.

Residing outside the village

61 individuals reside permanently outside the village. Two of the representatives interviewed as the registered land users are frequently residing outside the village. Although they are actual user, they themselves indicated that their connection to the land is weak. In particular, one of them stated: "*I just go occasionally to check the expenses, my mother goes sometimes to pick a few tomatoes or peppers, even for that she is reluctant. The lands are by the roadside and nothing is being done on them.*" Residing outside the village limits shareholders' relation with their land. Currently, the affected parcels are not considered a primary source of livelihood, and the involvement of the land users with these lands has been observed to be low. In most interviews, participants reported that the products on the lands holds little or no economic value. They described previous implementations related to public projects, including expropriations and boundary changes. For instance, that they were unsure whether they even owned land there, that expropriations had occurred, boundaries kept changing, or that the road

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and railway had taken portions of the land, leaving the parcels reduced in size and largely unusable. The lands are arranged sequentially along a narrow corridor between the railway and the highway. During land valuation (September 2025), most areas were observed to be vacant or idle. The number of structures and fruit and non-fruit trees recorded in the asset inventory (see also Appendix-1, Appendix-4, Figure 3-1, Figure 3-2, and Figure 3-3) corroborates this observation.

At the current stage of project preparation, parcel-level information on the exact size of land to be acquired from each Project-Affected Person (PAP) is not yet available, as the detailed expropriation planning and valuation process is being carried out by the DGII's Real Estate and Expropriation Department. This process will generate verified data on land take per parcel and per PAP, which will allow a more precise assessment of the magnitude and significance of land loss. Once this information is finalized and formally communicated to the Project Implementation Unit, it will be incorporated, analyzed, and disclosed through the relevant RP Addendum(s), in full compliance with ESS5 requirements.

Based on these findings, the impact of land acquisition on the registered land users residing in the village is considered low, and for other shareholders living outside the village, the land acquisition impact is deemed low.

Unidentified shareholders / not recognized by the community

Neither the registered land users/owners nor other community members had any knowledge of four individuals listed in the ownership records. It is assumed that these individuals may be new-generation owners who have obtained rights through inheritance of parcels. Another possibility is that they are names remaining from old title records, belonging to persons who had passed away. Because of this, it has not been possible to identify them based on information such as paternal name or surname.

When asked, current land users stated that they did not know whether these persons were their relatives or co-owners, nor did they understand why their names appeared on the same parcels. This situation may have resulted from inheritance procedures that led to the transfer of ownership rights to multiple heirs, or from the fact that inheritance procedures have not yet been completed for parcels where the registered owners had passed away many years ago. These uncertainties can only be clarified through official address verification to be carried out during the expropriation process. At this stage, it is not possible to gather available information about these owners through desk-based or field studies.

Uncertainties related to civil registry records

Based on the title deed information provided within the expropriation plan, filtering by Türkiye National Identification Number (TR ID) identified 102 unique individuals, and the total number of shareholders was considered to be 102 real persons.

A query using TR ID, name, surname, and father's name revealed an individual with the same name, surname, and father's name but recorded under a different TR ID. This individual (ID 90 and 95, see Table 4-10) appears as one of the 20 shareholders of parcel 110/2; however, due to the possibility of duplicate registration, there may actually be 19 landowners on this parcel.

Another person (ID 45 and 78, see Table 4-10) with the same name and father's name has a two-letter difference in the surname. To resolve such discrepancies, individuals may seek legal action, which can result in the same person being recorded under different TR ID. The aforementioned individual is one of the 11 shareholders of parcel 110/9; however, due to the possibility of duplicate registration, there may actually be 10 landowners on this parcel.

These complex population data indicate an issue stemming from official records.

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A separate issue is that two individuals (ID 5 and 75, see Table 4-10) listed under the same TR ID, name, and father's name have different surnames. This discrepancy arises from the same person being recorded under both her maiden surname and her family surname after marriage.

These findings demonstrate that the population and land registry records are not fully formalized. The identified errors cannot be corrected through desk-based studies. Such issues can only be addressed through official address verification procedures to be conducted during the expropriation process by the DGII.

Table 4-10: Shareholders of private parcels and their relationship with the land

ID	Interview Results: Residence and Other Information
1	Deceased
2	Not known by the mukhtar and/or villagers / No information available
3	Residing outside the village / Residence: Zonguldak / Çaycuma
4	Residing outside the village / Residence: Zonguldak / Çaycuma
5	Residing outside the village / Residence: Zonguldak / Filyos
6	Residing outside the village / Residence: Zonguldak / Çaycuma / Temenler
7	Deceased
8	Deceased
9	Zonguldak / Çaycuma / Gökçeler
10	Deceased
11	Zonguldak / Çaycuma / Gökçeler
12	Zonguldak / Çaycuma / Gökçeler
13	Zonguldak / Çaycuma / Gökçeler
14	Zonguldak / Çaycuma / Gökçeler
15	Zonguldak / Çaycuma / Gökçeler
16	Residing outside the village / Residence: Bartın
17	Deceased
18	Zonguldak / Çaycuma / Gökçeler
19	Deceased
20	Deceased
21	Deceased
22	Residing outside the village / Residence: İstanbul
23	Residing outside the village / Residence: Gümüşhane
24	Residing outside the village / Residence: İzmir
25	Residing outside the village / Residence: Germany
26	Residing outside the village / Residence: Zonguldak / Çaycuma
27	Zonguldak / Çaycuma / Gökçeler
28	Zonguldak / Çaycuma / Gökçeler
29	Deceased
30	Deceased
31	Residing outside the village / Residence: Zonguldak / Çaycuma / Saltukova

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ID	Interview Results: Residence and Other Information
32	Residing outside the village / Residence: Zonguldak / Çaycuma
33	Zonguldak / Çaycuma / Gökçeler
34	Residing outside the village / Residence: İstanbul
35	Residing outside the village / Residence: Trabzon
36	Residing outside the village / Residence: Zonguldak / Ereğli
37	Residing outside the village / Residence: İzmit
38	Residing outside the village / Residence: Zonguldak / Ereğli
39	Residing outside the village / Residence: Zonguldak / Ereğli
40	Residing outside the village / Residence: Zonguldak / Ereğli
41	Not known by the mukhtar and/or villagers / No information available
42	Not known by the mukhtar and/or villagers / No information available
43	Deceased
44	Deceased
45	Residing outside the village / Residence: Belgium
46	Deceased
47	Zonguldak / Çaycuma / Gökçeler
48	Zonguldak / Çaycuma / Gökçeler
49	Residing outside the village / Residence: İstanbul
50	Residing outside the village / Residence: İstanbul
51	Residing outside the village / Residence: Zonguldak / Ereğli
52	Zonguldak / Çaycuma / Gökçeler
53	Residing outside the village / Residence: Zonguldak / Çaycuma / Temenler
54	Residing outside the village / Residence: İzmit
55	Residing outside the village / Residence: Zonguldak / Çaycuma
56	Residing outside the village / Residence: Zonguldak / Çaycuma / Temenler
57	Deceased
58	Residing outside the village / Residence: Zonguldak / Ereğli
59	Residing outside the village / Residence: Zonguldak / Filyos
60	Deceased
61	Residing outside the village / Residence: İstanbul
62	Deceased
63	Deceased
64	Residing outside the village / Residence: Zonguldak / Çaycuma / Derekören (<i>Mukhtar of Derekören village</i>)
65	Residing outside the village / Residence: Zonguldak / Çaycuma
66	Deceased
67	Residing outside the village / Residence: İstanbul
68	Residing outside the village / Residence: Zonguldak / Çaycuma / Çömlekçi
69	Residing outside the village / Residence: Zonguldak / Çaycuma / Çömlekçi

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ID	Interview Results: Residence and Other Information
70	Residing outside the village / Residence: Zonguldak / Ereğli
71	Residing outside the village / Residence: Zonguldak / Çaycuma / Çömlükçi
72	Zonguldak / Çaycuma / Gökçeler
73	Residing outside the village / Residence: İstanbul
74	Deceased
75	Zonguldak / Çaycuma / Gökçeler
76	Deceased
77	Not known by the mukhtar and/or villagers / No information available
78	Residing outside the village / Residence: Belgium
79	Residing outside the village / Residence: Zonguldak / Çaycuma / Derekören
80	Residing outside the village / Residence: İstanbul
81	Residing outside the village / Residence: Zonguldak / Filyos
82	Residing outside the village / Residence: Düzce
83	Residing outside the village / Residence: Zonguldak / Filyos
84	Deceased
85	Residing outside the village / Residence: Zonguldak / Filyos
86	Residing outside the village / Residence: Zonguldak / Filyos
87	Residing outside the village / Residence: Zonguldak / Filyos
88	Zonguldak / Çaycuma / Gökçeler
89	Residing outside the village / Residence: Zonguldak / Filyos
90	Deceased
91	Residing outside the village / Residence: Ankara
92	Residing outside the village / Residence: Ankara
93	Residing outside the village / Residence: Zonguldak
94	Residing outside the village / Residence: Zonguldak / Çaycuma / Çömlükçi
95	Deceased
96	Residing outside the village / Residence: Zonguldak / Çaycuma / Saltukova
97	Residing outside the village / Residence: Zonguldak / Filyos
98	Residing outside the village / Residence: Zonguldak / Filyos
99	Residing outside the village / Residence: İstanbul
100	Residing outside the village / Residence: Zonguldak
101	Residing outside the village / Residence: Zonguldak / Çaycuma
102	Residing outside the village / Residence: Zonguldak / Kilim

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5 CATEGORIES OF PEOPLE AFFECTED BY LAND ACQUISITION

5.1 Land Owners

People who have legal titles to land and other assets (such as structures, vegetables, fruit and non-fruit trees etc.) on affected lands will be identified through official records obtained from the local and national Registry Offices after the land acquisition requirements of the Project are 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.

The distribution of parcels based on the area sizes are presented below with Table 5-1. The smallest parcel is 49.86 m² (private parcel), and the largest is 481,890.56 m² (Treasury land). The largest plot size among individually owned parcels is 1,392 m². All values exceeding this size belong to Treasury land and TCDD. In this regard, while the size of private parcels ranges approximately between 50 and 1,500 m², the size of Treasury land and TCDD properties varies between 1,500 and 500,000 m².

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Table 5-1. Parcel-Based Distribution of Expropriated Area Ratios¹⁸

#	Settlement	Block / Parcel	Land size	Expropriation amount	Rate (%)	Ownership	# of Shareholders
1	Derecikören	118 / 3	14,614.65	6,094.27	41.70	TCDD	NA
2	Filyos / Sefercik	0 / 4932	10,943.00	5,076.94	46.39	Treasury	NA
3	Filyos / Sefercik	0 / 4933	4,584.00	1,746.46	38.10	Treasury	NA
4	Filyos / Sefercik	0 / 5596	4,691.36	1,628.42	34.71	Treasury	NA
5	Filyos / Sefercik	168 / 1	67,781.80	18,565.60	27.39	TCDD	NA
6	Filyos / Sefercik	325 / 2	208,951.75	9,744.02	4.66	Treasury	NA
7	Filyos / Sefercik	331 / 1	481,890.56	4,926.84	1.02	Treasury	NA
8	Gökçeler	107 / 1	6,114.74	6,114.74	100.00	TCDD	NA
9	Gökçeler	107 / 2	4,044.32	4,044.32	100.00	TCDD	NA
10	Gökçeler	107 / 3	6,586.09	6,586.09	100.00	TCDD	NA
11	Gökçeler	110 / 12	122.31	122.31	100.00	Private	9
12	Gökçeler	102 / 20	1,291.34	349.01	27.03	Private	2
13	Gökçeler	102 / 21	448.84	448.84	100.00	Private	9
14	Gökçeler	102 / 22	508.45	508.45	100.00	Private	1
15	Gökçeler	102 / 23	375.51	375.51	100.00	Private	1
16	Gökçeler	102 / 24	1,392.19	682.47	49.02	Private	1
17	Gökçeler	110 / 1	378.97	378.97	100.00	Private	15
18	Gökçeler	110 / 2	307.69	307.69	100.00	Private	20
19	Gökçeler	110 / 3	199.80	199.80	100.00	Private	3

¹⁸ This table presents parcel-based information on land size and expropriated area within the expropriation corridor and does not reflect land loss at the individual PAP or shareholder level. Any expropriation ratios shown are calculated on a parcel basis and indicate the proportion of each parcel affected by expropriation. The assessment of land loss and associated economic impacts at the individual PAP level will be identified and addressed, as applicable, through the preparation of the relevant RP Addendum(s), in accordance with RP requirements.

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#	Settlement	Block / Parcel	Land size	Expropriation amount	Rate (%)	Ownership	# of Shareholders
20	Gökçeler	110 / 4	664.61	664.61	100.00	Private	22
21	Gökçeler	110 / 5	435.29	435.29	100.00	Private	1
22	Gökçeler	110 / 6	180.85	180.85	100.00	Private	9
23	Gökçeler	110 / 7	342.87	342.87	100.00	Private	1
24	Gökçeler	110 / 8	180.56	180.56	100.00	Private	1
25	Gökçeler	110 / 9	91.88	91.88	100.00	Private	11
26	Gökçeler	110 / 10	49.86	49.86	100.00	Private	8
27	Gökçeler	110 / 11	78.27	78.27	100.00	Private	6
28	Gökçeler	110 / 13	217.40	217.40	100.00	Legal process	1
29	Gökçeler	105 / 43	2,559.08	620.18	24.23	Treasury / Legal process	NA
30	Gökçeler	124 / 2	10,891.03	5.44	0.05	Treasury	NA
31	Sazköy	109 / 1	20,296.98	7,741.79	38.14	Treasury	NA
32	Sazköy	101 / 85	79,800.95	2,280.46	2.86	Treasury	NA
33	Sazköy	101 / 95	64,807.89	6,834.39	10.55	Treasury	NA
34	Sazköy	119 / 65	366,671.14	26,789.28	7.31	Treasury	NA
35	Sazköy	107 / 1	16,601.20	3,236.38	19.49	Treasury	NA
36	Sazköy	107 / 2	101,939.92	12,491.75	12.25	Treasury	NA

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5.2 Owners of fixed assets

5.2.1 Trees

The land inspection and inventory study could not be carried out for a total of 13 parcels, including 11 parcels located within the TPAO boundary, which could not be inspected, and 2 parcels that could not be accessed due to physical obstacles.

According to the physical findings from 23 parcels that could be visited during the land inspection study conducted on 18.09.2025, a total of 11 trees were identified on 7 parcels, including 3 fruit-bearing trees (apricot, fig, and pear) and 8 non-fruit-bearing trees (acacia, poplar, and willow) (see Appendix-1, Appendix-4, Table 5-2 and Figure 5-1).

The parcel 118/3 is a public parcel belonging to TCDD, and despite all investigation results, no formal or informal user has been identified for this parcel. A total of 10 trees were identified on 4 private parcels, with 23 shareholders who may hold rights over these trees (see Table 5-2 and Figure 5-1).

For the total of 10 trees on 4 parcels, 4 separate land users were identified. Three of these users are relatives of the shareholders listed in the ownership records (a grandchild, a nephew, and a spouse), while the other is one of the shareholders (see Appendix-1, Appendix-4, Table 5-2 and Figure 5-1).

Considering the number of shareholders and users together with the tree assets, the economic loss for the affected PAHs will be low. For the public land, no user has been identified, and therefore there is no economic loss impact for this area (see Appendix-1, Appendix-4, Table 5-2 and Figure 5-1).

The main impact of land acquisition has been assessed through the PAHs of the land users who have rights to the mentioned tree. A total of 10 people live within the PAHs of the 4 land users (see Appendix-1, Appendix-4, Table 5-2 and Figure 5-1).

All shareholders and users are considered as eligible person due to economic loss from losing the trees and will be addressed within the compensation payments.

Detailed information about PAHs are given in Appendix-1.

A draft price for these trees was prepared based on the quantity, age, unit, and total price data of individual fruit-bearing and non-fruit-bearing trees in Çaycuma District, Zonguldak Province. This valuation study serves as a preliminary preparation for the main compensation determination studies to be conducted in the future and does not directly correspond to official prices.

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Table 5-2. Owners of fixed assets- Trees

Settlement	Block / Parcel	Land size (m ²)	Expropriation amount (m ²)	Expropriation rate	Registered Land User	Household size of the Land User	Ownership	Number of shareholders	Type	Quantity (Unit)	Age (Years)	Unit Price	Total Price (TRY ¹⁹)	Total Tree Price (TRY)
Derekören	118/3	14,614.65	6,094.27	42%	-	-	TCDD	-	Apricot	1	5	951.69	951.69	951.69
Gökçeler	102/22	508.45	508.45	100%	1 registered land user Relative of the deceased sole owner (ID 10) living in the village / not included in the shareholder list	2	Private	102/22: 1 shareholder 102/23: 1 shareholder	Fig	1	5	2,028.00	2,028.00	5,484.08
	102/23	375.51	375.51	100%	1 land user Spouse of the shareholder / not included in the shareholder list	4			Acacia	1	15	206.25	206.25	
	102/24	1,392.19	682.47	49%	1 registered land user Relative of the shareholder residing outside the village / not included in the shareholder list	2	Private	102/24: 1 shareholder	Pear	1	15	3,249.83	3,249.83	
	110/2	307.69	307.69	100%	1 registered land user One of the shareholders living in the village	2	Private		Acacia	1	15	206.25	206.25	1,237.50
					4	10	3 Private lands 1 Public land	23		11			Total	7,879.52
SUMMARY	5 parcels													



Figure 5-1: Fixed Assets- Trees

¹⁹ Turkish Lira

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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 private land which they are users of
- PAPs who are land owners of structures on the public lands

The land inspection and inventory study could not be carried out for a total of 13 parcels, including 11 parcels located within the TPAO boundary, which could not be inspected, and 2 parcels that could not be accessed due to physical obstacles. The findings, including the identification and valuation of affected assets, will be incorporated into the RP Addendum(s) to be prepared by the DGII PIU and disclosed in accordance with ESS5 requirements. The official land inspection and asset inventory for the identified 13 parcels will be conducted by the DGII Real Estate and Expropriation Department as part of the formal expropriation process and completed prior to the commencement of construction works. The RP Addendum will be prepared based on the results of this official Asset Inventory and will be submitted to the World Bank for review and approval before implementation. According to the physical findings from 23 parcels that could be visited during the land inspection study conducted on 18.09.2025, a total of 6 structures were identified on 5 parcels, including

1. Public land_Steel Warehouse,
2. Public land_Gökçeler Train Station Waiting Hall,
3. Private parcel_Semi-Masonry Warehouse,
4. Private parcel_Wire-Mesh Gate-Fence,
5. Out of expropriation_Reinforced Concrete House, and
6. Out of expropriation corridor_Sheet Metal Hut.

The valuation study serves as a preliminary preparation for the main compensation determination studies to be conducted in the future and does not directly correspond to official prices. The details of the methodology and content used in the valuation study are provided separately in the Appendix-1.

1. Steel Warehouse: This structure is located on TCDD parcel No. 107/3. It is directly under the use of TCDD and is not used by any private individual. The structure is a steel warehouse. It has an area of approximately 12 m² and is a 10-year-old reinforced concrete construction with a terrace feature. Based on the unit prices of the MoEUCC, the approximate value of the structure has been determined as 22,680 TRY. This structure is one of the technical components in the Gökçeler Train Station area (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3).

2. Gökçeler Train Station Waiting Hall: The building containing the waiting hall belonging to Gökçeler Train Station is located on TCDD parcel No. 107/3. This structure is directly owned by TCDD and is classified as a public building. Therefore, expropriation procedures applicable to public buildings will need to be implemented regarding ownership and usage. The building is a reinforced concrete structure. Its intended use has been designated as a warehouse and waiting hall. It is estimated to be approximately 10 years old and has an area of around 30 m². Based on the unit prices of the MoEUCC, the approximate value of the building has been

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determined as 82,350 TRY (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3).

3. Semi-Masonry Warehouse: Within private parcel No. 102/24, a partial masonry warehouse-type structure of approximately 30 m² has been identified. The building is surrounded by dense tree cover, and there is no accessible entry point. The landowner resides in İstanbul, and the land user of the building is his sibling. During the interview with the land user, it was stated that the construction of the building was initiated by the land user and landowner a long time ago for commercial purposes but remained unfinished due to the personal circumstances. It was explained that, since the parcel is located by the roadside, the building was intended to serve as a roadside facility such as a tea garden. The construction of the ground floor was completed, but the upper floor was not started. Currently, the ground floor is suitable for use as a warehouse, but it is not being utilized for any storage purposes. Negligence has been cited as the reason for the interruption of the building's construction, with no other reasons reported. The parcel has a single owner. The land user of the land is a sibling of the owner, who resides outside the village. The household size of land user (PAH) is four persons. Based on the unit prices of the MoEUCC, the approximate value of the building has been determined as 19,324 TRY (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3)

4. Wire-Mesh Gate-Fence: On private parcel No. 110/5, which has a single owner, the owner is also the user of the land. There are two people living within the PAH. During the interview with the user of the land, it was stated that the garden is used to cultivate subsistence crops such as beans, corn, peppers, tomatoes, and onions, and that the household's main source of income is retirement pension. In the same interview, it was also stated that trees such as walnut, apple, hazelnut, plum, grape, and persimmon are present on the land; however, these were not observed during the field assessment.

Within the land, there is a movable iron gate with wire mesh. The age of the gate is estimated to be 3 years, and its size is approximately 3.75 m². The estimated value is 3,845 TRY. A wire mesh fence with iron posts, used to enclose the garden, has a length of 15 m and a mesh area of 15 m². Using the unit prices of the MoEUCC, the approximate value of the 3-year-old iron post wire mesh fence has been determined as 6,175.56 TRY (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3).

5. Reinforced Concrete House: This building, located opposite the intersection of TCDD parcel No. 107/3, where Gökçeler Train Station is situated, and parcel No. 107/2, also owned by TCDD, is within the area designated as the expropriation corridor but lies in a section excluded from expropriation. It has been observed that the building is completely abandoned. A railway line passes between Gökçeler Train Station and this building. Due to safety concerns on the railway line, which is active with both passenger and freight train traffic, access to the building was not possible. However, it can be observed from outside that the building lacks protective materials such as doors and windows. The building is not in any functional use. The structure, described as a two-story reinforced concrete house, has been calculated at approximately 110 m² per floor. Its age is estimated to be around 10 years. The approximate value determined for the building is projected to be 1,760,616.00 TRY. The ownership of the building could not be identified, and no users were encountered inside or outside the building. As previously noted, the building is located outside the areas designated for expropriation, on land without available block-parcel information (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3).

6. Sheet Metal Hut: Outside private parcels No. 102/20 and 102/21, there is an old roadside sheet metal hut. This shelter is located on the road, outside the expropriation corridor. It is used by the local community. Opposite this shelter (on the other side of the road), there is another shelter in better condition. The shelter, made of a metal sheet cabin, is estimated to be 5 years old and occupies an area of approximately 2 m². Using the unit prices from the MoCT's Unit Price Supplement List, the cost for assembly and disassembly of the movable

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metal sheet cabin has been estimated at 2,051 TRY (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3).

For structures located on private parcels 110/5 and 102/24, both the landowners and the users will be recognized as eligible persons in accordance with ESS5, and will be included in the entitlement matrix.

The structures located on public parcel, identified as 107/3, are public property, and any impacts arising from land acquisition will be assessed in accordance with Article 30.

Abandoned building that is within the expropriation corridor but outside the area to be expropriated will be assessed only if it is affected during project activities. However, no land use or user has been identified for this building at this time.

The final approach regarding the metal sheet bus shelter, which is located outside the expropriation corridor but is in public use, will be determined through future studies to be carried out.

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.

5.2.3 Other assets

There are also other assets on the parcels affected by the land acquisition of the project. On private parcels, these include trees without economic value, bushes, small vegetable gardens enclosed in a rudimentary way, and various randomly placed covering materials. After the draft valuation study, although no separate value was assigned to these elements for the further expropriation process, they may still hold value for their users. For instance, small vegetable gardens have value for those cultivating, and non-fruit trees also have economic value, e.g. the value of the wood. On public parcels, similarly, forest trees without economic value and various bushes are present. Valuations for these elements were excluded, as they were considered to have no economic value. During the final studies, these components may either be included in the process or remain excluded.

Current land sale prices have been included in the document to compare with the values of the lands in the area. The locations of the relevant lands are indicated by Figure 5-4. According to the current data obtained from sahibinden.com, the price per square meter of comparable lands varies. For the land in the closest location, the current price per square meter is 11,455 TL and 4,795 TL.

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Table 5-3: Owners of fixed assets- Structures

Settlement	#	Block / Parcel	Land size (m ²)	Expropriation amount (m ²)	Expropriation rate	Registered Land User	Household size of the Land User	Ownership	Number of shareholder	Type	Total Price (TRY)
Gökçeler	1.	107/3	6,586.09	6,586.09	100%	-	-	TCDD	-	Steel Warehouse	22,680
	2.									Gökçeler Train Station Waiting Hall	82,350
	3.	102/24	1,392.19	682.47	49%	1 registered land user Relative of the shareholder residing outside the village / not included in the shareholder list	2	Private	1	Semi-Masonry Warehouse	19,324
	4.	110/5	435.29	435.29	100%	1 registered land user Both solely owner and user of the land	2	Private	1	Wire-Mesh Gate-Fence	10,026.50
	5.	Out of expropriation	-	-	-	-	-	Not available	-	Reinforced Concrete House	1,760,616
	6.	Out of expropriation corridor	-	-	-	-	-	Not available	-	Sheet Metal Hut	2,051
						2	4		2	Total	1,897,047.5

107/3 Steel Warehouse View Point: East	107/3 Gökçeler Train Station Waiting Hall View Point: East	102/24 Semi-Masonry Warehouse View Point: North East	110/5 Wire-Mesh Gate-Fence View Point: South East
Out of expropriation Reinforced Concrete House View Point: North		Out of expropriation corridor Sheet Metal Hut View Point: North East	
1 41,55588, 32.06533, 39,1m, 16° 18 Eyl 2025 10:18:28		1 41,5582, 32.0613, 40,0m, 25° 18 Eyl 2025 11:20:50	

Figure 5-2: Owners of fixed assets- Structures-1

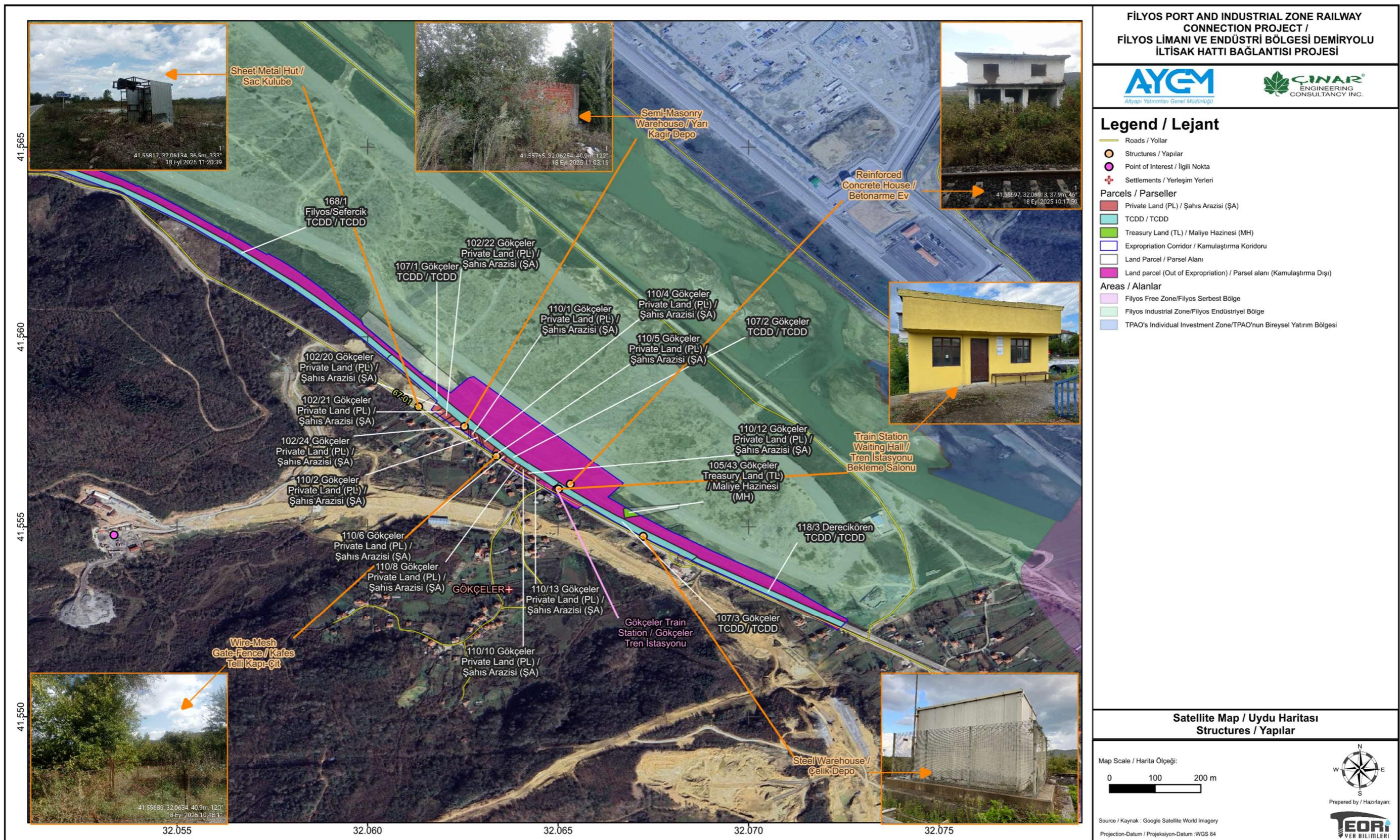


Figure 5-3: Owners of fixed assets-Structures-2

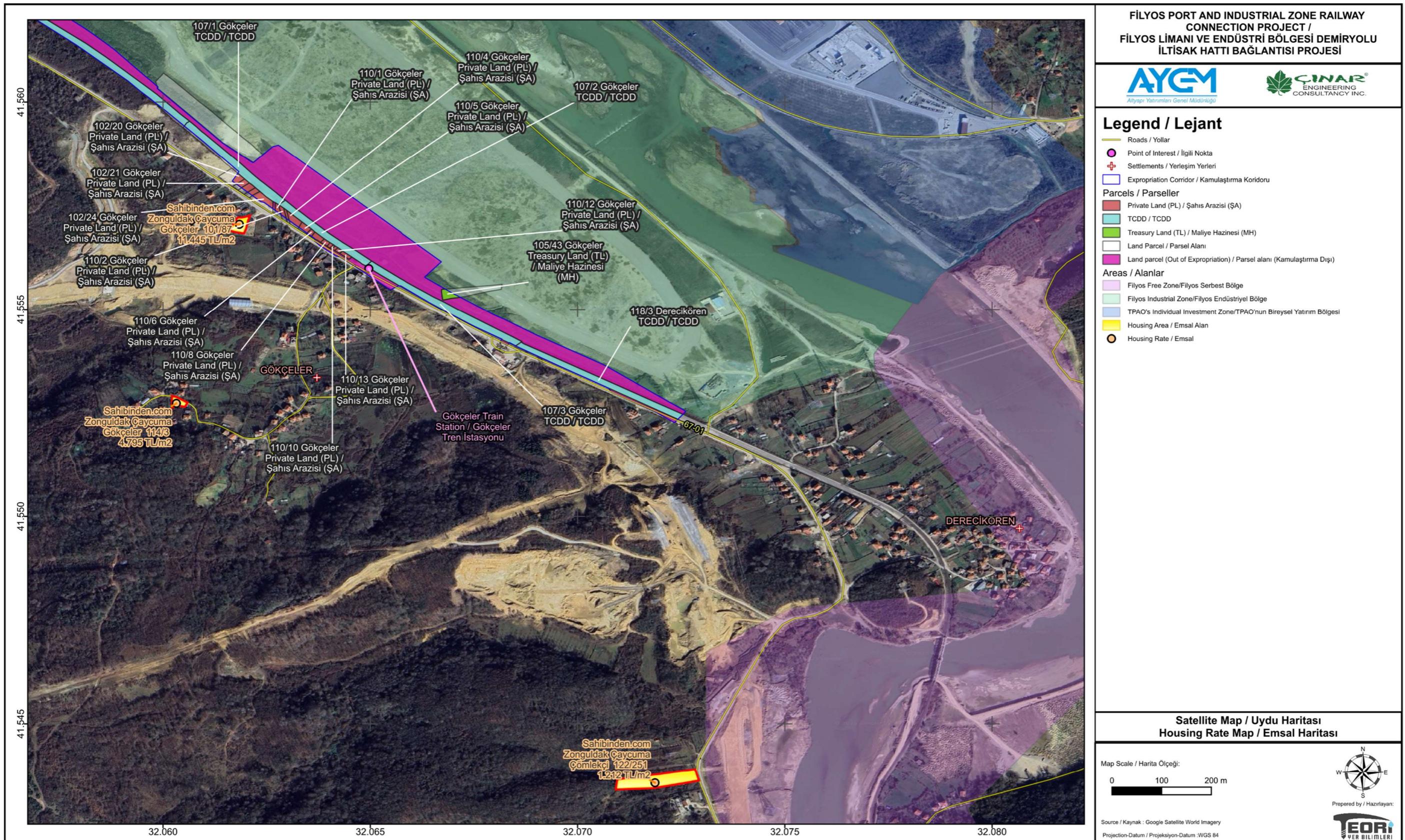


Figure 5-4: Housing Rate Map

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5.3 Land users

The users of the lands and trees, structures, and other assets located on the land to be acquired are also rights owners within the scope of RP. These users can be categorized in two groups: (1) formal (legal) users, and (2) informal users. However, there are no identified informal users on public lands. All groups hold various rights within the scope of RP.

5.3.1 The land users

Users of land and immovable assets can be classified as two groups: legal (formal) users and illegal (informal) users.

Users of privately owned lands have been identified as land users; however, no usage has been observed on public lands. The structures located on public lands (e.g., Gökçeler Train Station and associated areas) are for public use. For the remaining areas, no direct usage has been observed.

The land users identified within the scope of RP are:

1. Sole owner
2. Spouse of the sole owner
3. Sibling of the sole owner living in the village

Son of the deceased sole owner

4. Relative of the deceased sole owner living in the village. Therefore, the heirs to be legally determined in the future will be considered as PAPs.
5. One of the shareholders living in the village
6. Spouse of one of the shareholders
7. Relative of the shareholders living in the village

The distribution of users by privately owned parcels is as follows (see Table 5-4).

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Table 5-4. Information about Land Users &PAHs

List number of User Land	ID of Land User (if any)	Information about the Land User & PAHs					Information about the land				Identified Asset
		Relationship of the Land user with the landowner / shareholder	Gender	Age	Household size of the Actual User	Primary Income Source of PAH	Block / Parcel	Land sequence number in the Expropriation Plan	Land Type	Total number of Shareholders	
1	-	Spouse of the sole owner (ID 13)	Female	42	4	Employment as a worker/official in permanent jobs	102 / 23	15	Garden	1	Trees
2	ID 12	One of the shareholders living in the village	Male	61	2	Retirement	110 / 3	19	Garden	3	No asset
3	ID 18	One of the shareholders living in the village	Male	74	2	Retirement	110 / 2	18	Garden	20	Trees
		Son of the deceased sole owner (ID 19)					110 / 7	23	Garden	1	No asset
4	-	Spouse of the sole owner (ID 47)	Female	65	2	Retirement	110 / 8	24	Garden	1	No asset
5	ID 88	One of the shareholders living in the village	Male	79	2	Retirement	110 / 1	17	Garden	15	No asset
6	-	Spouse of one of the shareholders (ID 64)	Male	63	4	Agriculture	102 / 20	12	Field	2	No asset
7- Land User without ID number	-	Sibling of the sole owner living in the village (ID 67)	Male	57	2	Retirement	102 / 24	16	Garden	1	Semi-Masonry Warehouse + Trees
8	-	Spouse of one of the shareholders (ID 28)	Female	70	3	Retirement	110 / 12	11	Garden	9	No asset
							102 / 21	13	Field	9	No asset
							110 / 6	22	Garden	9	No asset
9	ID 5	One of the shareholders living in the village	Female	66	No response	No response	110 / 9	25	Garden	11	No asset
10	ID 33	One of the shareholders living in the village	Male	32	2	Retirement	110 / 10	26	Garden	8	No asset
11 - Land User without ID number	-	Relative of the shareholders living in the village	Female	64	2	Retirement	110 / 11	27	Garden	6	No asset
12 - Land User without ID number	-	Relative of the deceased sole owner (ID 10) living in the village	Male	64	2	Retirement	102 / 22	14	Field	1	Trees
13	ID 14	Sole owner	Male	68	2	Retirement	110 / 5	21	Garden	1	Wire-Mesh Gate-Fence
14	ID 52	One of the shareholders	Female	75	4	Retirement	110 / 4	20	Garden	22	No asset
Rejected	-	Land under dispute / Rejected (ID 20)	Rejected	Rejected	Rejected	Rejected	110 / 13	28	Garden	1	No asset

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5.3.2 Beneficiaries of the common properties

Users of privately owned lands have been identified as land users; however, no usage has been observed on public lands. The structures located on public lands (e.g., Gökçeler Train Station and associated areas) are for public use. For instance, there is no information on the number of daily users of the train station. For other technical structures under TCDD (e.g., steel warehouses), direct public use does not occur. Although it is outside the expropriation corridor, the bus stop is also a common-use facility. The number of users for this facility is also unknown.

No other common-use areas, such as forests, pastures, grazing lands, or water sources, exist apart from the structures mentioned above.

For the 11 parcels within the TPAO boundary, there is no private use, and even if a common resource were available, it is inaccessible for public use.

For the Treasury and TCDD lands outside the TPAO boundary (7 plots), no formal or informal usage has been observed.

As of February 2025, interviews were conducted with representatives of the Çaycuma District Governorate and Filyos Town Municipality, mukhtars and elderly people in the village that holds official information on land use. According to their findings, no informal land use practices were found due to the “vacant” and “unused” condition of the land. The information obtained in February was re-verified through consultations with the same institutions. A meeting with Zonguldak Provincial Special Administration was proposed and conducted regarding land use. In addition, detailed inquiries on usage were carried out with the neighborhood heads (Gökçeler, Derekören, and Sefercik) and the village elders. No use was identified in areas outside the TPAO boundaries as a result of any of the completed consultations. The areas within the TPAO boundaries are located within a special security zone, and therefore, there is no individual use in these areas. For example, land registered as agricultural area under Treasury ownership was described by the representative as vacant and unused. Excluding public lands for which information could not be obtained, no formal or informal land use by individuals was found in Treasury lands and TCDD areas. It was reported that five of the lands that appear to be gardens are used by TPAO within the construction site as a stockyard and access road.

Similarly, although the 325/2, and 331/1 parcels appear as Filyos river, and flood plain it has been reported that these areas are used by TPAO as green areas. Part of the area in parcel 331/1 is used as a stockyard, while parcel 325/2 appears as a green space. The stated land use (which has not been verified by TPAO) may therefore differ from its actual or intended use. As this information has been obtained indirectly and has not been formally verified by TPAO, it is referred to as the intended or reported use, which may differ from the officially recorded land use and the actual use to be confirmed through the formal asset inventory and verification process.

In September 2025, the abovementioned institutions were re-visited to verify the data obtained in February, and the collected information was reviewed again. No new comments were received from the relevant institutions during this revisit. During these meetings, information was also obtained regarding the zoning plans for the lands in the area. Besides, consultation with the Zonguldak Provincial Special Administration was recommended.

During the meeting with Zonguldak Provincial Special Administration, no information could be obtained regarding the public use status of the lands. However, unofficial findings were gathered concerning the existing facilities on the parcels and which institution's jurisdiction the relevant parcels fall under. The compiled information needs to be verified through direct coordination with the relevant institutions during the expropriation process (see Table 5-5).

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Table 5-5. Current condition of Public Lands

# (Expropriation Plan)	Settlement	Locality	Block / Parcel	Owned by	Current Condition	Relevant Authority ²⁰
1	Derecikören	Darılık	118/3	TCDD	No information	Zonguldak Provincial Special Administration
2	Sefercik	Ada öte karşı	-/4932	Treasury	No information	Filyos Municipality
3	Sefercik	Ada öte karşı	-/4933	Treasury	No information	Filyos Municipality
4	Sefercik	Ada öte karşı	-/5596	Treasury	No information	Filyos Municipality
5	Sefercik	Kavak yanı	168/1	TCDD	No information	Filyos Municipality
6	Sefercik	<i>No locality name</i>	325/2	Treasury	No information	Filyos Municipality
7	Sefercik	<i>No locality name</i>	331/1	Treasury	No information	Filyos Municipality
8	Gökçeler	Dikilitaş	107/1	TCDD	In the vicinity of the Kilimli- Filyos- Saltukova Dual Carriageway Project (ongoing)	Zonguldak Provincial Special Administration
9	Gökçeler	Dikilitaş	107/2	TCDD		
10	Gökçeler	Dikilitaş	107/3	TCDD		
29	Gökçeler	Gökçeler düzü	105/43	Treasury	Around the Energy Transmission Line	Zonguldak Provincial Special Administration
30	Gökçeler	<i>No locality name</i>	124/2	Treasury	No information	Zonguldak Provincial Special Administration
31	Sazköy	Ada	109/1	Treasury	Filyos Port	Zonguldak Provincial Special Administration
32	Sazköy	Denizkenarı	101/85	Treasury	Filyos Port	Zonguldak Provincial Special Administration
33	Sazköy	Gölkenarı	101/95	Treasury	Filyos Port	Zonguldak Provincial Special Administration
34	Sazköy	Kum	119/65	Treasury	Filyos Port	Zonguldak Provincial Special Administration
35	Sazköy	Muratlar	107/1	Treasury	Filyos Port and Industrial Area	Zonguldak Provincial Special Administration

²⁰ It refers to the zoning plan that falls within the jurisdiction area of the institution

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# (Expropriation Plan)	Settlement	Locality	Block / Parcel	Owned by	Current Condition	Relevant Authority ²⁰
36	Sazköy	Muratlar	107/2	Treasury	Filyos Port	Zonguldak Provincial Special Administration

5.4 Vulnerable Groups and PAPs that need special attention

The impacts of the project on some PAPs will be greater than on others. These are (i) vulnerable groups, (ii) PAPs significantly affected by the project. Vulnerable groups among PAPs consist of people such as female headed of household, elderly, disabled. People significantly affected by the project are; those who will lose more than 10% of their total land holdings. Vulnerability Assurances will be provided to vulnerable PAPs, and livelihood restoration measures will be provided to people significantly affected by the project.

5.4.1 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:

- Female heads of household,
- Elderlies,
- People with handicapped including home bound, bedridden individual, and
- Illiterates.

Summary of the vulnerable groups within the households are as following;

- 6 PAHs including female household head,
- 2 PAHs including disabled individuals,
- 8 PAHs including elderly people,
- 3 PAHs including elderly individuals who are in need of care, bedridden, and homebound
- 1 PAH including illiterate adult.

5.4.2 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”:

Significantly Affected People have been defined for this RP as “PAPs whose total land holding are affected by the Project more than 10%”. Livelihood restoration measures have been planned for significantly affected people.

The losses of 102 individuals listed as landowners have been assessed in terms of their total landholdings. In this assessment, calculations were made based on the total landholdings of these 102 individuals located within the expropriation corridor. If the individuals own additional lands outside the expropriation corridor, there is no available information regarding these lands.

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In total, expropriation is planned of 18 privately owned parcels. The total area of these parcels is 7,266.69 m², of which 5,614.64 m² (77%) has been included in the expropriation plan. In 16 of the 18 privately owned parcels, the expropriation rate is 100%, while in one parcel it is 49% and in another it is 27%. Accordingly, the losses of the landowners of the privately owned parcels due to expropriation are at the same rates: 99 individuals have lost 100%, 1 individual has lost 49%, and 2 individuals have lost 27% (see Table 5-6).

Table 5-6: Assessment of Land Loss for 102 Individuals

ID	The total landholding of the shareholders within the AOL (m ²)	Expropriation Amount (m ²)	Loss Ratio in Total Landholding (%)
1	15.38	15.38	100.00
2	41.54	41.54	100.00
3	25.26	25.26	100.00
4	25.26	25.26	100.00
5	18.38	18.38	100.00
6	41.54	41.54	100.00
7	15.38	15.38	100.00
8	25.26	25.26	100.00
9	50.53	50.53	100.00
10	523.83	523.83	100.00
11	66.60	66.60	100.00
12	66.60	66.60	100.00
13	375.51	375.51	100.00
14	435.29	435.29	100.00
15	15.38	15.38	100.00
16	15.38	15.38	100.00
17	25.26	25.26	100.00
18	15.38	15.38	100.00
19	342.87	342.87	100.00
20	217.40	217.40	100.00
21	83.56	83.56	100.00
22	6.52	6.52	100.00
23	66.60	66.60	100.00
24	6.52	6.52	100.00
25	83.56	83.56	100.00
26	94.94	94.94	100.00
27	6.52	6.52	100.00
28	83.56	83.56	100.00
29	83.56	83.56	100.00
30	83.56	83.56	100.00
31	83.56	83.56	100.00
32	26.09	26.09	100.00
33	1.39	1.39	100.00
34	2.08	2.08	100.00
35	1.39	1.39	100.00

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ID	The total landholding of the shareholders within the AOL (m ²)	Expropriation Amount (m ²)	Loss Ratio in Total Landholding (%)
36	1.39	1.39	100.00
37	2.08	2.08	100.00
38	9.95	9.95	100.00
39	30.63	30.63	100.00
40	30.63	30.63	100.00
41	9.95	9.95	100.00
42	6.89	6.89	100.00
43	12.47	12.47	100.00
44	12.47	12.47	100.00
45	9.19	9.19	100.00
46	83.56	83.56	100.00
47	180.56	180.56	100.00
48	7.79	7.79	100.00
49	7.79	7.79	100.00
50	7.79	7.79	100.00
51	36.75	36.75	100.00
52	10.38	10.38	100.00
53	41.54	41.54	100.00
54	94.94	94.94	100.00
55	94.94	94.94	100.00
56	41.54	41.54	100.00
57	94.94	94.94	100.00
58	41.54	41.54	100.00
59	25.26	25.26	100.00
60	41.54	41.54	100.00
61	94.94	94.94	100.00
62	94.94	94.94	100.00
63	25.26	25.26	100.00
64	645.67	174.51	27.03
65	6.52	6.52	100.00
66	26.09	26.09	100.00
67	1392.19	682.47	49.02
68	15.38	15.38	100.00
69	15.38	15.38	100.00
70	12.25	12.25	100.00
71	25.26	25.26	100.00
72	94.94	94.94	100.00
73	15.38	15.38	100.00
74	15.38	15.38	100.00
75	15.38	15.38	100.00
76	15.38	15.38	100.00
77	9.95	9.95	100.00
78	9.19	9.19	100.00

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ID	The total landholding of the shareholders within the AOL (m ²)	Expropriation Amount (m ²)	Loss Ratio in Total Landholding (%)
79	645.67	174.51	27.03
80	7.79	7.79	100.00
81	10.38	10.38	100.00
82	10.38	10.38	100.00
83	10.38	10.38	100.00
84	15.38	15.38	100.00
85	25.26	25.26	100.00
86	25.26	25.26	100.00
87	50.53	50.53	100.00
88	50.53	50.53	100.00
89	50.53	50.53	100.00
90	15.38	15.38	100.00
91	15.38	15.38	100.00
92	15.38	15.38	100.00
93	15.38	15.38	100.00
94	15.38	15.38	100.00
95	15.38	15.38	100.00
96	16.62	16.62	100.00
97	83.56	83.56	100.00
98	10.38	10.38	100.00
99	15.38	15.38	100.00
100	83.56	83.56	100.00
101	25.26	25.26	100.00
102	25.26	25.26	100.00
Total	7,830.48	6,178.43	78.90

The total landholdings are based on the documents provided together with the expropriation plan, and the actual total landholdings of individuals can be finalized through official address verification procedures carried out during the expropriation process. As noted in the limitations section, some of the individuals listed in the expropriation plan are deceased or have incorrect identification numbers. At this stage, a detailed assessment has not yet been conducted for individuals who are identified as land users but are not included in the official landowner list. In line with ESS5, such land users are considered Project-Affected Persons (PAPs), and the required information regarding their use of land and potential impacts will be identified, assessed, and included in the relevant RP Addendum(s).

Detailed information has been provided for all land users with Table 5-4. For land users numbered (please refer to the column: List number of land User of Table 5-4) List number of land User: 7, List number of Land User:11, and List number of Land User:12 in this list, no assessment can be made regarding vulnerability due to land loss. The remaining 11 users are either direct landowners, one of the co-owners of the land, or first-degree relatives (spouse, and son) of the landowner/co-owner, and are within the same PAH as the owner.

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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 PAPs and an Asset Inventory has been prepared on parcel basis with user identification.

Information has been obtained for a total of 36 parcels located within the expropriation corridor as part of the RP field studies. A total of 14 people participated in the interviews for private parcels. The distribution of users by privately owned parcels is given in Table 5.3.

All of the private parcels are located within the boundaries of Gökçeler village. The distribution of parcels by the number of shareholders is presented in Table 5-7.

Summary of the findings of the survey are listed below:

- 14 PAHs, for whom the potential physical and economic resettlement impacts on 17 private land parcels could be observed. The total population of these PAHs is 34 individuals.
- Average household size of the PAH is 2.43. Most common household size is 2.
- Gender distribution of the total population of these PAHs is 19 female, and 15 male.
- Most populated age group is 15-64 with 19 people. The number of elderly people (14) is higher than children (1).
- The number of elderly individuals who are in need of care, bedridden, and homebound is 3.
- Among the 14 Project-Affected Households (PAHs), 8 households are represented by male household heads, while 6 households are headed by female household heads.
- Average age of the representative of PAH is 62.86.
- The youngest PAH's representative is a 32-year-old male, while the oldest PAH's representative is a 79-year-old man.
- 7 of the PAH's representatives are overaged. The remaining 7 representatives are in ages between 32 and 64.

The details regarding the participants in the interviews, as part of the current economic conditions, are as follows:

- Most common primary income source (11 individual) is retirement.
- It is followed by employment as a worker or civil servant in permanent jobs, and agriculture.
- Among secondary income sources, the top three are agriculture, livestock employment as a worker or civil servant in permanent jobs, and temporary daily works.
- 5 of the 14 households have no other income source.

PAH representatives who were interviewed were asked to evaluate the approximate monthly income of their households.

Of the 14 PAH representatives who participated in the interview, 7 described their monthly income as being minimum wage and 22,000 TL. The minimum wage for 2025 is 26,005.50 TRY gross and 22,104.67 TRY net. The second range among the income level is represented by 5 household head is 22,000 and 55,000 TL (Poverty line).

The household's main expenditure item is most commonly food and kitchen expenses, followed by heating and fuel, and rent.

Among the most commonly stated secondary household expenditure items, heating and fuel expenses followed by food and kitchen expenses, clothes, health, and agricultural expenses.

All of households have stated that they spend all of their monthly income.

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In response to the question "The number of individuals aged 15-64 in the household who are looking for work but unable to find it," 2 out of 14 households answered with 0.

PAH representatives interviewed within the scope of the RP field study were asked whether their household members were the owner/shareholder of any land. All of the representatives responded that their households own or share land. There are 18 private parcels, of which 1 is under litigation. The number of owners per parcel varies significantly. Multi-owner parcels are as common as single-owner parcels (see Table 5-7).

Table 5-7. Distribution of the private parcels by number of shareholders

Number of shareholders per private parcels	Gökçeler
1	6
2	2
3	1
6	1
9	4
19	1
20	1
22	1
32	1
Total	18

Landowners whose share of land to be acquired for the project in relation to their total land holdings is above 10% would be considered as severely affected. Detailed information about this vulnerability condition is given on 5.4.2. Significantly Affected People.

According to the results of the interview, agricultural activities are not ranked as first among the most common primary income sources.

8 out of 14 respondents answered the question, "Do you have cultivated agricultural land on the relevant parcel?" negatively. Only 2 individuals who answered "yes" have stated that agricultural activity in this area is their primary source of livelihood. The current crops present on the agricultural lands include pepper, eggplant, bean, corn, tomato, onion, animal feed, alfalfa, barley, and wheat. During the physical field survey conducted in September, no evidence was found of the cultivation of products other than those in the vegetable gardens (such as alfalfa, barley, and wheat). Parcels that could not be assessed during winter (February 2025) due to snow cover were re-visited in September 2025 and were observed to be nearly vacant, fallow, or covered with products (vegetables, fruit, and non-fruit trees) of limited economic value. There is no significant difference between the crops planned to be planted in the future and the current ones. Some of the owners did not expect to utilize the area in the next season.

When participants were asked whether they have other lands aside from the ones they cultivate, two of them responded with "yes."

When asked about their agricultural lands, "Has this land been subject to expropriation, land consolidation, or similar processes before? Can you briefly explain?", none of the respondents answered in the affirmative. The future plan provided by users regarding the potential damage to agricultural lands due to the Project's land acquisition activities were roughly summarized around limiting / reducing the activity. The remaining had no idea regarding future plan in line with expropriation results.

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Two participants have vineyard activities within the agricultural lands. They prefer to utilize the land in next season for grapes and fig cultivation.

Horticultural activities carried out as agricultural practices were not indicated by anyone as the main source of livelihood. While it was not clearly stated what exactly was grown, vegetables such as pepper, eggplant, bean, corn, tomato, and onion were planted in these areas.

The fruit-bearing and non-fruit-bearing tree species encountered in areas where trees are grown mostly consist of the following:

- Fruit trees such as fig, walnut, apple, plum, hazelnut, grapevine, and persimmon
- Non-fruit trees such as willow,

The above-mentioned crops that were reported to exist during the consultations were not observed during the physical field surveys. Detailed information about fixed assets is given in 5.2.1 Trees sub section of 5.2. Owners of fixed assets.

In the event that the tree-covered areas will be damaged due to the project's land acquisition activities, limiting / reducing the activity and completely abandoning of fruit cultivation has been suggested. These explanations indicate that there are no substitutions or alternative plans available from the users' perspective.

As a summary of the discussions held with the landowners /users, the general views expressed about the Project were as follows²¹:

- Some participants stated that, prior to expropriation, they could only carry out small-scale gardening sufficient for household consumption.
- *All lands here are jointly owned, so we cannot farm properly. We expect the state to mediate and make these lands productive*
- *Employment opportunities and provision of social support*
- *Livestock can be considered as a support area*
- *Most people living in the village are retirees and make a living through gardening. Therefore, if new land is provided to those whose fields are expropriated, the negative impact would not be as severe.*
- *Support should be given for cultivating a crop specific to the region*
- *There could be leadership, such as forming a cooperative, for women's initiatives*

In accordance with the information provided by the 14 heads of households who participated in the discussions about the relevant parcels in the expropriation corridor, a total of 1 illiterate adult among the household members.

The number of disabled individuals in 14 households is 2. The number of elderly individuals who are in need of care, bedridden, and homebound in 3 households is 3.

²¹ The opinions are presented in alphabetical order.

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7 POTENTIAL IMPACTS OF PHYSICAL AND ECONOMIC DISPLACEMENT

7.1 Affected Lands and Land Based Livelihoods

7.1.1 Affected Lands and agriculture

Based on the socio-economic information provided, almost all individuals identified as the land users reported retirement, with regular pension payments, as their primary source of livelihood. Only one Project-Affected Household (PAH) identified agriculture as its main livelihood source. The views of this PAH are presented in Table 7.1.

The data collected through the HLS shows differences compared to the Asset Inventory study conducted in September regarding the crops reported to be cultivated on the lands. For example, fodder crops and alfalfa, which could be associated with livestock, were not observed. Due to their current sizes, the parcels are also not suitable for wheat or barley cultivation, as there is no area large enough for agricultural machinery to operate. The relevant areas are only suitable for vegetable gardens and the cultivation of fruit and non-fruit trees.

Rather than concerns about the impact of the Project on the existing lands, greater emphasis has been placed on the outcomes of past investments that have been continuously carried out in the region. Legal issues arising from previous expropriation processes on the lands are still ongoing. One land shareholder, who is a defendant in the case (the title transfer has not yet taken place), refused to participate in the consultation. Another PAH representative attended the meeting but did not provide information, stating that due to the ongoing court cases the PAH representative (List number of Land User is 9, ID 5) did not want to share details, and stated that the other shareholders (sisters) also continue to oppose, which prevented them from contributing to the conclusion.

16 out of 18 privately-owned parcels will be fully expropriated. This creates significantly affected people. At present, even for the PAHs, the economic link to the land is weak. Most PAHs have left their lands uncultivated. In addition, apart from the trees identified during the Asset Inventory, no other products with economic value were observed. After the draft valuation study, although no separate value was assigned to these elements for the further expropriation process, they may still hold value for their users. For instance, small vegetable gardens have value for those cultivating, and non-fruit trees also have economic value, e.g. the value of the wood.

Nevertheless, in some households, although the land and its activities are not the primary source of livelihood, the garden products produced on the land have an economic value. Even though no additional products of economic value were identified beyond those recorded during the Asset Inventory, the statement by a land user (List number of Land User is 14, ID 52) that "we used to exchange (barter)" indicates a loss of household income, which should not be overlooked (see Table 7-1).

Participating the land users were asked the open-ended question: "How will the implementation of the Project affect your life? Positively or negatively?" The responses received are as follows in Table 7-1.

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Table 7-1: How will the implementation of the Project affect your life? Positively or negatively?

List of Land User	ID of the Land User (if any)	Evaluation in line with agriculture & land loss
1	-	I expect it to be positive
2	ID 12	Positive impacts, beneficial to the country economically
3	ID 18	Positive impacts
4	-	No impact
5	ID 88	Positive impacts. Economically it will be good. People will work here and come here
6	-	Negative Negative impact. It will prevent us from farming. Our entire livelihood depends on agriculture
7	-	It will be good in terms of transportation
8	-	Negative Good for transportation, but bad for us. Our fruit trees and farming are gone
9	ID 5	Rejected to answer
10	ID 33	No impact
11	-	Positive
12	-	Positive impacts
13	ID 14	Negative Negative impacts, because it takes away my source of livelihood
14	ID 52	Negative Negative. We used to exchange (barter) things produced there, but that is gone

The impacts related to the land loss and agricultural activities can be summarized as follows;

- The impact arising from land loss has caused high sensitivity for all shareholders and has been classified as a critical impact.
- Loss of agricultural income: Based on the direct statements of 14 PAH representatives, 4 out of 14 PAHs are assessed as experiencing a significant impact, while the remaining are assessed as low impact.
- The livelihood loss impact on non-PAH shareholders is low.

The tree values determined during the Asset Inventory (18.09.20925) are preliminary and intended for use in the valuation study to be conducted during the official expropriation process. All PAHs and the land users (regardless of whether they are listed among legal shareholders) on the lands will be recognized as entitled parties in the official procedures.

7.1.2 Informal Users

No informal use has been identified on public lands.

7.1.3 Affected trees

The trees assessed under the Asset Inventory study are presented in detail in subsection 5.2.1 of section 5.2. Owners of fixed assets. During consultations with the land users, the trees and products mentioned were also indicated by the land users to have economic value. In this regard, the Asset Inventory should be considered as a draft, and the views expressed under the Section 7.1.1 should be taken into account during the official valuation studies. The RP should then be updated through the preparation of RP Addendums, which will be based on the official asset inventory to be conducted by DGII, with officially announced cut-off dates, and which will be finalized, consulted upon, and subject to the World Bank's approval and the RP will be updated accordingly to clearly reflect these processes.

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7.2 Affected Structures

Two separate categories should be used to assess the affected structures. The first category includes structures on public lands, and the second category includes structures on private lands.

Public lands

Among the structures on public lands, the Gökçeler train station (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3) and its associated areas located directly within the expropriation corridor may have a negative effect on public use. While this effect does not constitute an economic or physical resettlement impact, the unavailability of these areas could result in changes to routine travel patterns. This effect would apply to all passengers using the Gökçeler train station. However, this effect is not considered within the scope of the RP, but is addressed in the ESIA and ESMP documents.

The same assessment applies to the bus stop (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3) located outside the expropriation corridor. Passengers using this stop during construction activities should be taken into account. This effect is not included within the scope of the RP, but is addressed in the ESIA and ESMP documents.

For the abandoned building located within the expropriation corridor but not included in the expropriation, no use or user could be identified. Therefore, the impact of the loss of this building is considered low.

Private lands

The partially constructed building on the private parcel No. 102/24 (see Appendix-1, Appendix-4, Table 5-3, Figure 5-2, and Figure 5-3) is considered significant for both the official landowner and the user of the land (List number of Land User is 7). The representative value determined for this evaluation under the Asset Inventory study dated 18.09.2025 should be reviewed during the official expropriation process and assessed within the eligible persons and entitlement matrix scope for the entitled parties, taking ESS5 requirements into account and RP updated accordingly.

For the structure located on parcel 110/5, the sole owner is also a land user. The loss of this structure is considered significant. During the official valuation studies, the draft Asset Inventory study dated 18.09.2025 should be taken into account, and the relevant person's loss should be compensated.

In addition to Asset Inventory study dated 18.09.2025, there are structures with no economic value, but which may have economic value for the landowners and users. On private parcels, these include small vegetable gardens enclosed in a rudimentary way, and various randomly placed covering materials.

No structures were referenced during consultations with the registered land users. However, to prevent losses to PAPs including PAHs, these structures without economic value should also be considered in the official valuation studies in accordance with ESS5.

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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)

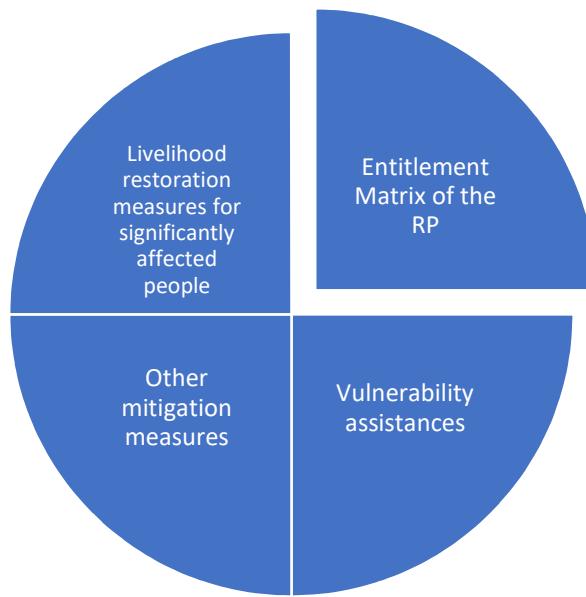


Figure 8-1: Resettlement and compensation strategy

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.

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 gardens- 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.

According to some provisions of the National law;

No land can be used for the project 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. Such funds are released to the rightful owner once ownership is legally established, in accordance with the applicable legal procedures,

- 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 structures					
1.1	Loss of other immovable / buildings related with livelihood activities	102/24: Semi-Masonry Warehouse - 1 land user - Household size of land User: 2 - Number of shareholder: 1	List number of land User: 7	Payment at replacement cost (payment of the expropriation compensation to the beneficiary, including debris and without deduction for depreciation.	Compensation will be paid from the Expropriation Budget of DGII. However, the full replacement cost not covered by legal legislation will be provided by the RP-fund provided by DGII.
		110/5: Wire-Mesh Gate-Fence - 1 land user - Household size of land User: 2 - Number of shareholder: 1		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.
		(see Appendix-1, Appendix-4, Section 5.2.2 / Table 5 2, Figure 5 2, and Figure 5 3)	(see Appendix-1, Appendix-4, Section 5.3.1 / Table 5 3)	Supports such as transportation and labor will be provided for the relocation of structures 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 Expropriation budget to informal users whose ownership ties cannot be proven with official documents, compensation will be paid from the RP- Livelihood Restoration Programme (LRP) Fund.
2. Agricultural lands and trees					
2.1	Loss of agricultural lands / Land-related productive assets	13 parcels where the presence of trees or structures could not be verified due to access constraints	Both landowner and user Both co-owner of the land and user Users with no land (see Appendix-1, Appendix-4, Section 5.3.1 / Table 5 3)	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 law22. 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 Expropriation Budget of DGII. However, full replacement is not covered in national legislation so the remainder will be provided by the available sources and budget of DGII.
		2 fields and 11 gardens		<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.	
		10 Land Users, 2 of them are not listed within shareholder list (List number of Land User; 11 and 12)		<i>Harms and damages:</i> 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 Ministry of Agriculture and Forestry (MoAF) will be paid. Compensation for damages to buildings/structures will be calculated by experts according to the cost tables of the MoEUCC.	
		- Household size of Land Users: 23 - Number of shareholder: 102			
		(see Appendix-1, Appendix-4, Section 5.3.1 / Table 5 3)			
2.2	Loss of trees	102/22 and 102/23: 3 trees, Fig, Acacia, and Pear 1 Land user Household size of Land user: 2 Number of shareholder: 1 1 Land user Household size of Land user: 4 Number of shareholder: 1 See Appendix-1, Appendix-4, Section 5.2.1 Trees (Table 5 1 and Figure 5 1)	Relative of the deceased sole owner (ID 10) living in the village / not included in the shareholder list Spouse of the shareholder / not included in the shareholder list See Appendix-1, Appendix-4, Section 5.2.1 Trees (Table 5 1 and Figure 5 1)	Values of assets are also added to the expropriation value. 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.)	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. 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.

²² 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
					<p>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.</p> <p>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.</p> <p>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.).</p> <p>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.</p> <p>Compensation is already provided for trees according to Article 19 of the Expropriation Law. If compensation cannot be provided from the Expropriation budget to informal users whose ownership ties cannot be proven with official documents, compensation will be paid from the RP-LRP Fund.</p> <p>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.</p>

3. Community and Public Resource Impacts					
3.1	Public use impacts on services and common assets	<p><i>Gökçeler Train Station Waiting Hall</i> The building containing the waiting hall belonging to Gökçeler Train Station is located on TCDD parcel No. 107/3. This structure is directly owned by TCDD and is classified as a public building</p> <p><i>Sheet Metal Hut</i> Outside private parcels No. 102/20 and 102/21, there is an old roadside sheet metal hut. This shelter is located on the road, outside the expropriation corridor. It is used by the local community</p> <p>See Appendix-1, Appendix-4, Section 5.2.2 Structures see Table 5 2, Figure 5 2, and Figure 5 3)</p>	Local people	<p>The current infrastructure and services will be protected and regulated so as not to bring economic losses to its users.</p> <p>Any type of impact on other public assets used by locals will be consulted with relevant state authorities (TCDD, Highways Directorate, Filyos Municipality, Çayirova District Governorate, Zonguldak Provincial Special Administration) and compensated at full or avoid through project design.</p>	<p>DGII will make official correspondence with the institutions such as TCDD, Highways Directorate, Filyos Municipality, Çayirova District Governorate, Zonguldak Provincial Special Administration for the protection of these assets.</p>

4. Livelihoods, Vulnerable Groups, Quality of Life					
4.1	Vulnerable groups	12.	<p>The number of female household heads is 6, The number of disabled individuals in 14 households is 2, Number of elderly people is 14, The number of elderly individuals who are in need of care, bedridden, and homebound is 3, and 1 illiterate adult.</p>	<p>Priority in livelihood restoration measures Simplified access to information and grievance redress mechanisms (e.g., audio-visual formats for illiterate adults) In cases of project-related displacement or resettlement, entitlement to Transitional Livelihood Support (TLS) based on vulnerability and significance score, plus moving allowance. 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.</p>	<p>Special priority and reasonable accommodations will be given to vulnerable PAPs such as elderly, persons with disabilities, home-bound due to illness, and illiterate adults.</p> <p>Livelihood restoration programs will be adapted for vulnerable PAPs, providing increased support proportional to their vulnerability and significance scores (see Appendix-2).</p> <p>Communication will be adapted to meet the needs of vulnerable groups, including audio-visual materials, to ensure full understanding and participation in grievance procedures and project information sharing.</p> <p>TLS packages will be designed to accommodate specific vulnerabilities, such as mobility support for the elderly or disabled. Additional legal and social support will be offered to facilitate smooth transition.</p>

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No	Impact category	Approximate number of households / persons / assets under impact	Entitled People	Entitlement	Explanations / Responsibilities
4.2	Significant impact on total land holdings of the farmers	102 Shareholders 14 Land users See Section 5.4.2 Significantly Affected People, Table 5.6	PAPs whose total land holding are affected by the Project more than 10% Shareholders and Land users	<p>These people are paid compensation at the full replacement costs, they can buy new ones to replace the lost land. Acquisition of a 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.</p> <p>Agricultural trainings for farmers.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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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.

8.2 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.

- Landless land users of impacted public lands,
- PAPs whose total land holding are affected by the Project more than 10%.

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 USD²³) according to the Official Gazette dated December 27,2024.

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.

Local Employment

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 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.

²³ United State Dollar

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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

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 (see Table 8-2).

Table 8-2. Livelihood restoration programme

PAP Category	Type of LRP instrument	Implementation	Time
Landowners / shareholders / land users and land users not included in the shareholder list	TLS Local employment Agricultural trainings	The household will be entitled to receive TLS. 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%	<ul style="list-style-type: none"> ▪ TLS ▪ Local employment ▪ Agricultural trainings 	No definition has been made for this category yet. Once the definitions are completed, these individuals will be included in the livelihood restoration program as specified: PAPs whose total land holding are affected by the Project more than 10% 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. 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

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8.3 Other Mitigation Measures

8.3.1 Protective and supportive measures for agricultural activities

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.

- 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 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 and protecting agricultural infrastructure will prevent the reduction of income sources of landowners / shareholders / land users and land users not included in the shareholder list. These parts will be directly 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.

8.3.2 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 land users not included in the shareholder list determined by MoAF will be paid by updating.

8.4 Vulnerability Assistsances

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:

- Females, especially who are the sole heads of household,
- Elderlies,
- People with handicapped including home bound, bedridden individual, and
- Illiterates.

There may be various problems that vulnerable people may encounter difficulty in access to opportunities provided in the scope of E&S Management Plans. Vulnerable PAPs can have

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difficulty in access to stakeholder engagement activities, accessing grievance mechanism, receiving compensation or crop payments and benefitting from livelihood restoration activities.

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), in 8 out of 14 land users, there are vulnerable individuals for various reasons, while in 5 households no vulnerability has been identified. For one land user, the vulnerability status could not be determined, as the representative did not want to respond due to the ongoing legal process.

In addition to these vulnerability cases, all land users and shareholders are considered vulnerable due to “Land owners with more than 10% of the total land holding affected” (see Table 8-3).

In addition, although land users 7, 11, and 12 are identified as land user, no land assets have been identified for them. In Table 8-3, these individuals are also highlighted separately.

Table 8-3: Distribution of household members by vulnerability

Land user					Vulnerability conditions				
ID number, if any	List number of Land User	Age	Gender	Household size	Elderly	Individuals in need of care, bedridden, home-dependent	Persons with disabilities	Non-Turkish speaker	Illiterate adults
-	1	42	Female	4	0	0	0	0	0
ID 12	2	61	Male	2	0	0	1	0	0
ID 18	3	74	Male	2	2	0	0	0	0
-	4	65	Female	2	2	1	0	0	0
ID 88	5	79	Male	2	2	0	1	0	1
-	6	63	Male	4	0	0	0	0	0
-	7	57	Male	2	0	0	0	0	0
-	8	70	Female	3	2	1	0	0	0
ID 5	9	66	Female	1	No response	No response	No response	No response	No response
ID 33	10	32	Female	2	1	0	0	0	0
-	11	64	Female	2	1	0	0	0	0
-	12	64	Male	2	0	0	0	0	0
ID 14	13	68	Male	2	2	0	0	0	0
ID 52	14	75	Female	4	1	1	0	0	0

8.4.2 Vulnerability Assistance

PAPs that have an existing vulnerability independent of the project will be provided with Vulnerability Assistance under the RP. The types of assistance for vulnerable groups are presented in Table 8-4 below, but the assistance to be provided may not be limited to these. PAPs identified as vulnerable group members with the land acquisition of the Project and PAPs affected by more than 10% of the land acquisition are considered within the scope of RP. However, this assessment could not be carried out due to deficiencies related to the total land holdings of the shareholders.

The requests of PAPs are always evaluated by the DGII PIU and can be achieved by evaluating the relation to vulnerability and the project.

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Table 8-4. Vulnerability Assistance

Vulnerability category among PAHs	Vulnerability assistance
PAH including Elderlies	<p>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.</p> <p>These Vulnerability Assurances include but are not limited to:</p> <ul style="list-style-type: none"> • 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. • Engagement opportunities at home (especially for handicapped /homebound-bedridden eligible individuals).
PAH including People with handicapped including home bound, bedridden individual	
PAH including Illiterates	Oral, face-to-face and visual engagement opportunities will be provided, if needed in the land acquisition process. Consultancy will be provided in line with their demands in accessing social services.

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. 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 implementation prior to construction 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/audit 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:

- Were the compensations and measures provided in the RP implemented properly and timely?
- Did the eligible groups receive their full compensation entitlements within the agreed period?
- Were the compensation and measures offered in RP be effective in maintaining or increasing the living standards of PAPs?
- Were the complaints made by PAPs managed and resolved in accordance with the RP and SEP?
- Were measures related to stakeholder engagement and resettlement taken to include vulnerable groups and significantly affected people?
- Were there additional impacts or eligible groups not identified in the RP? (person or groups who may experience physical and economic losses)
- Were the mitigation measures defined in the Resettlement Plan (RP) and monitored through the Third Party Monitoring Mechanism (TPMM) implemented to address land acquisition and 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: Internal monitoring and evaluation (M&E) will be carried out by the implementing institution through regular reporting to assess and document responses to the above questions.

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: Concluding both internal and external monitoring processes, the RP Completion Audit will assess the extent to which the measures implemented are consistent with the commitments set out in the RP, including livelihood restoration, and will determine whether any additional actions are required. RP Completion Audit will be conducted by External Monitoring Consultant. Internal and external monitoring reports are reviewed 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

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

Roles and responsibilities of the units to be authorized in the monitoring and evaluation process are defined in Table 13-2.

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Table 10-1: The 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	<p><i>M&E activities</i></p> <ul style="list-style-type: none"> ▪ Preparation of M&E reports and submission to Project management and lenders ▪ 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. <p><i>RP implementations for Monitoring</i></p> <ul style="list-style-type: none"> ▪ 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 plan in detail the subsequent measures to be taken in consultation with the relevant parties of the RP Implementation. 	Quarterly	<ul style="list-style-type: none"> ▪ 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 these 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
	Resettlement	External Monitoring	<i>M&E activities</i>	Semi-annually	

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Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators for Monitoring
Independent Party (External Monitoring Company)	Specialists		<ul style="list-style-type: none"> ▪ 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 <p><i>RP implementations for Monitoring</i></p> <ul style="list-style-type: none"> ▪ To provide advice to DGII on corrective actions and measures to be taken to improve RP implementation 		<ul style="list-style-type: none"> ▪ Number of information and consultation activities performed related to the resettlement process ▪ Number of consultations with vulnerable groups ▪ Number of PAPs receiving transitional livelihood support or other compensation ▪ Number of PAP / households receiving additional support ▪ The number of compensation agreements awarded and reconciled ▪ Number of ongoing lawsuits for which no consensus can be reached ▪ Percentage of complaints resolved in a timely manner ▪ 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
	Resettlement Specialists	Completion Audit	<ul style="list-style-type: none"> ▪ M&E activities ▪ Organizing M&E studies, reviewing reports and submitting them to Project management and lenders. ▪ To report findings to PIU ▪ RP implementations for Monitoring ▪ To review implementation of RP ▪ To verify compliance with the entitlements 	At the end of the Project	<ul style="list-style-type: none"> • Assessment of whether RP objectives have been achieved • Verification that PAPs are not worse off than pre-project conditions • Identification of any outstanding corrective actions

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Responsible Party	Unit	M&E content	Roles in M&E process	Frequency	Indicators for Monitoring
Supervision Consultant	Social expert	Internal Monitoring	<p><i>M&E activities</i></p> <ul style="list-style-type: none"> ▪ 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 <p><i>RP implementations for Monitoring</i></p> <ul style="list-style-type: none"> ▪ 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	<ul style="list-style-type: none"> ▪ Records, signed petitions, official documents, photographs, materials, complaint registration and closure forms available on the following topics: <ul style="list-style-type: none"> ○ 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

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11 PUBLIC PARTICIPATION AND DICLOSURE 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

Following the redefinition of the project alignment in Phase 2, the settlements of Gökçeler, Sazköy, Sefercik, and Derecikören settlements were going to be affected by the expropriation plan.

The relevant field study was carried out on 4 - 5 February 2025 with three people. Within the scope of the planned field study was to conduct 100% census of PAPs and identify all affected land. In September, fieldwork was repeated to complete the activities that remained unfinished in February. Within this scope, physical land surveys, the Asset Inventory study, and the valuation study were carried out. Additionally, meetings were held with Zonguldak Provincial Special Administration to determine the usage status of public parcels.

Detail of the mentioned activities are given in Section 4 Methodology.

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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 announced in consultation 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. The final RP will also be announced on the World Bank website with a separate link. Any addition or amendment to the RP at later stages of the project will be subject to The World Bank approval; 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.

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.

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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:

igorkem.gokmen@uab.gov.tr, hazal.babur@uab.gov.com.tr

Contact persons: İbrahim Görkem Gökmen, Hazal Babur

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

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Complaint register form (CRF) (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances).

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

- Presidency's Communication Center (CİMER)
- Foreigners Communication Center (YİMER)

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.

Details are also given in project-specific SEP document.

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 (see Appendix-7 and Appendix-8)
- 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.

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, Social Specialist and Community Liaison Officer (CLO) at DGII PIU will be

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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.

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. Beginning in the first quarter of 2026, the Directorate of Real Estate and Expropriation will initiate expropriation activities, with the appointed Construction Contractor actively carrying out field operations throughout this process. The activities to be carried out within the scope of RP implementation are summarized in Table 13-1.

Table 13-1: RP Implementation Activities

Implementation Issue	Implementation Activities	Implementation Duration
Public information, consultation and participation Prior to land entry (see Appendix-5 and Appendix-6)	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.	Q1, 2026
Establishing a grievance mechanism Prior to announcement of entitlements to eligible persons	Appropriate and accessible grievance mechanisms will be available in order to receive and resolve grievances of affected people.	Q1, 2026
Asset Inventory and Valuation Following the establishment of the valuation commission	<p>A draft Asset Inventory (AI) has been prepared with a cut-off date of 18 September 2025. This draft inventory is based on preliminary field assessments and is used for planning and indicative impact assessment purposes only; it does not constitute the official land and asset identification for expropriation.</p> <p>The official Asset Inventory will be conducted by the Real Estate and Expropriation Department prior to the commencement of construction. The official cut-off date will be formally announced through appropriate disclosure channels, in accordance with national legislation and the World Bank's requirements. Assets identified through the official expropriation process will fall within the scope of expropriation, and their values will be disclosed to the respective legal rights holders.</p> <p>Based on the results of the official Asset Inventory, RP Addendums will be prepared to</p>	Q1,2026

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Implementation Issue	Implementation Activities	Implementation Duration
	reflect any changes in affected assets, users, or entitlements. The RP Addendums will be disclosed and consulted upon with affected parties and submitted to the World Bank for review and approval. Approval of the relevant RP Addendum will constitute a prerequisite for the commencement of construction activities in the affected areas.	
Announcement of entitlements to eligible persons Prior to negotiation meetings	A list including the current status of all PAHs has been prepared and presented within this RP. The relevant list will be updated during the process of identifying legal rights holders in the course of official expropriation procedures. Once the legal rights holders are identified, it is mandatory to send official notifications to the individuals. After this stage, the legal negotiation meeting with PAPs will commence. During the consultation process, the DGII PIU team will also participate in the meetings to ensure access to all PAPs. In these meetings, PAPs will also be provided with information about the Project and introduced to the communication channels. At this stage, the practices required under ESS5 will also be communicated to the individuals. In the case of PAHs identified as users during the RP process, communication will likewise be carried out through the PIU.	Q2,2026
Preparation of Contractor contracts Prior to land entry (see Appendix-5 and Appendix-6)	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.	January, 2026
Evaluation of replacement value / cost for immovable properties After the official expropriation payments	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.	The third quarter of 2026
Eligibility and entitlement to compensation and support After the official expropriation payments	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 registered land users not listed in shareholder list.	The third quarter of 2026
Obtaining land rights Prior to negotiation meetings	Land rights will be taken over by making compensation payments and allocation transactions. Prior to these activities: <ul style="list-style-type: none">• Ensure that all PAHs have an active bank account registered in their own name in accordance with national banking regulations. Where required,	The third quarter of 2026

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Implementation Issue	Implementation Activities	Implementation Duration
	<p>provide assistance to PAHs in opening a bank account.</p> <ul style="list-style-type: none"> • Ensure the transfer of payment to the respective PAHs • For PAHs who cannot be reached, open an Escrow account and deposit the compensation payment 	
Monitoring and evaluation After all payments determined in accordance with national and international standards have been completed	Monitoring arrangements will be made during the expropriation / resettlement implementation, including livelihood restoration / community development programs.	The third quarter of 2026
Operation of the grievance mechanism	Complaints of affected people will be taken and resolved within the framework of the principles in Section 12.	During Project Cycle

13.1 Roles and Responsibilities

DGII Expropriation Department will be the main authority in the preparation of the expropriation plans RP, 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 this RP. The following Table 13-2 shows the distribution of roles and responsibilities for RP implementation.

Table 13-2. Roles and Responsibilities in RP Implementation

Unit	Responsibility
Expropriation Department of DGII	<ul style="list-style-type: none"> ▪ 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.

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Unit	Responsibility
DGII PIU (Social Expert))	<ul style="list-style-type: none"> ▪ 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 standard requirements of ESS5, and this RP. ▪ 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)	<ul style="list-style-type: none"> ▪ 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)	<ul style="list-style-type: none"> ▪ Monitors and reports the progress made regarding the commitments defined in the RP. ▪ 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 0-2 includes vulnerability and significance scoring as well as livelihood restoration measures. The vulnerability and significance scoring is based on predefined indicators reflecting affected persons' socio-economic characteristics, dependency on impacted livelihoods, and the magnitude and duration of project-related impacts. The TLS amounts to be paid according to the score calculated in the light of this information are presented in Table 0-1. The cumulative score obtained through this assessment determines the duration of Transitional Livelihood Support (TLS) payments, ensuring that TLS provisions are proportionate to the level of vulnerability and impact experienced and that the calculation method is applied in a transparent and consistent manner.

The DGII PIU will lead and oversee this process, with technical support from the Consultant, including the confirmation and refinement of the calculation basis. The responsibility for implementation rests with the DGII PIU, and detailed arrangements will be set out in the RP Addendum(s), which will be prepared and subject to the World Bank's approval prior to the commencement of construction works.

Table 0-1 TLS Calculation Chart²⁴

Vulnerability and significance score	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

Category Kategoriler	Score Puan	Entitlements Haklar
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>

²⁴ TLS durations are determined based on the cumulative vulnerability and significance score calculated using predefined indicators related to socio-economic conditions, livelihood dependency, and the severity of project-related impacts.

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Category Kategoriler	Score Puan	Entitlements Haklar
Elderly people in need of care and social assistance, Home/bedbound due to Chronic Disease <i>Bakıma ve sosyal yardıma muhtaç yaşılılar, Kronik rahatsızlık sebebi ile eve/yatağa bağımlı olan kişiler</i>	10	TLS when combined with significant impact (see the lines below). <i>Projeye bağlı hassasiyetlerle bir araya geldiğinde TLS</i>
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> 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>
Illiterate people <i>Okuma yazma bilmeyen kişiler</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 parselerin 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 pauana 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%	15	TLS by score if livelihoods are affected <i>Geçim kaynakları etkileniyorsa puana göre TLS</i>

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Category <i>Kategoriler</i>	Score <i>Puan</i>	Entitlements <i>Haklar</i>
<i>Toplam toprak varlığı Projeden %10'den fazla etkilenen PEK'ler</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: The estimated budget will be provided as a separate Excel sheet once the parcels, their corresponding usage areas, the legal owners, and informal users are identified by the contractor and reviewed by the consultant, following approval by the committee established by the Real Estate and Expropriation Directorate of DGII and a field visit. Considering the high inflation in Türkiye, it is necessary to wait until the final stage to ensure that no rights are compromised and that all affected parties receive updated compensation amounts. Therefore, at this stage, a definitive budget or timeline cannot be provided.

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Appendix-4 Photographs

Will be provided as a separate folder.

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Appendix-5 Land Entry Protocol

FILYOS PORT AND INDUSTRIAL ZONE 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 DGII Representative. Annexes:

Landowner/Shareholder
Land user
Settlement Head (Mukhtar)
DGII Representative
CC Representative

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Appendix-6 Land Exit Protocol

FILYOS PORT AND INDUSTRIAL ZONE RAILWAY CONNECTION PROJECT LAND EXIT PROTOCOL²⁵

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 Filyos Port and Industrial Zone 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 outstanding 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)		
DGII Representative		
CC Representative		

²⁵ For leased land, or land inadvertently damaged

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Appendix-7 Sample Complaint Register Form

Complaint register form			
Name of the person who received the complaint:		Date:	
Position:			
Information Regarding the Complainant	Type of complaint		
Name - surname (not mandatory)		Private land acquisition	<input type="checkbox"/>
Telephone number (not mandatory)		Public land acquisition	<input type="checkbox"/>
Address (not mandatory)		Environmental problems	<input type="checkbox"/>
Village		Damage or lost during the construction	<input type="checkbox"/>
Province - District		People and animal health	
In which way the complaint has been received	<input type="checkbox"/> Telephone <input type="checkbox"/> Meetings <input type="checkbox"/> Personal Application <input type="checkbox"/> By post - email <input type="checkbox"/> Petition <input type="checkbox"/> Field visit <input type="checkbox"/> Other:	Access problems and negative restrictions	<input type="checkbox"/>
		Social and Cultural problems	<input type="checkbox"/>
		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?	<input type="checkbox"/> YES <input type="checkbox"/> 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 Name-surname Date and signature	Owner of the complaint Name-surname Date and signature (if there is no signature reasons for that need to be explained)

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Appendix-9-1 RP Questionnaire - Blank Forms

Will be provided as a separate folder.

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Appendix-9-2 Household Questionnaire – Blank Forms

Will be provided as a separate folder.

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Appendix-10 Guide to Land Acquisition and Compensation

This Guide to Land Acquisition and Compensation (GLAC) is a summary of the RP that will be implemented by DGII. It provides information about the Project to Project Affected People (PAPs) and explains the key steps of the RP and why it must be implemented. The GLAC also presents the compensation principles that will be followed by DGII and details what compensation and livelihood restoration measures PAPs are entitled to and how this can be claimed. The GLAC will also provide responses to frequently asked questions and DGII contact details.

The Filyos Port and Industrial Zone Railway Connection Project, implemented by the Ministry of Transport and Infrastructure (MoTI) through its Directorate General of Infrastructure Investments (DGII), aims to improve rail freight efficiency in Türkiye by enhancing last-mile connectivity, operational performance of rail-enabled logistics centers, and institutional capacity in the rail intermodal and freight logistics sector.

The project route is located within Filyos, Çaycuma District, Zonguldak Province, starting northwest of Derekören Village, passing northeast of Gökçeler Village, crossing the Filyos River, traversing the Filyos Industrial Zone and TPAO facilities, and terminating at the eastern quay of Filyos Port. The project is classified as “Substantial” risk under the World Bank Environmental and Social Framework (ESF).

A total of 36 parcels are subject to land acquisition, including 18 private parcels owned by 102 shareholders and 18 public parcels owned by the Treasury and TCDD. Field surveys, conducted in February and September 2025, and consultations with local authorities and mukhtars, identified the affected persons and land use patterns.

In 18.09.2025, an Asset Inventory was prepared by ÇINAR based on affected parcels. A valuation study was conducted for all assets (e.g., wire fences, walls), crops (e.g., trees), and other structures (e.g., abandoned or occupied buildings) located on the affected parcels.

The Directorate will also conduct 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 will be 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 will be incorporated into compensation calculations.

Compensation will be based on full replacement costs, including land, structures, crops, and trees, in accordance with the Entitlement Matrix.

The project identifies vulnerable groups, including female heads of households, elderly, and disabled persons, as well as significantly affected persons whose land holdings are largely impacted.

Livelihood restoration measures, transitional support, local employment, and training programs are planned to ensure that affected persons can restore or improve their pre-project living standards.

A robust monitoring and evaluation framework, comprising internal and external monitoring and a completion audit, has been established to ensure that resettlement and compensation are conducted according to the Resettlement Plan that is prepared in compliance with the World Bank ESS5 standards and the national legislation. Stakeholder engagement and a grievance mechanism will ensure continuous consultation/engagement, feedback, and resolution of concerns throughout the implementation.

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In summary, the RP ensures fair land acquisition, compensation, and livelihood restoration for affected persons while minimizing social and environmental impacts, in line with national regulations and international best practices.

Purpose and Scope

The DGII is committed to sustainable development and to implement the RP that is in compliance with WB ESS5 and the national legislation. The RP aims to identify project impacts, ensure fair and transparent land acquisition, provide compensation at replacement cost, restore or improve livelihoods, ensure meaningful consultation and participation of PAPs, establish an effective grievance mechanism, monitor resettlement activities, and provide additional support to vulnerable groups.

The alignment of the Project during the initial preparation phase, affected 471 parcels, but the final design reduced this to 36 parcels. Of these, 18 are private (102 shareholders) and 18 belong to the Treasury/TCDD, most of which lie inside secured TPAO/Filyos Port areas with no formal or informal users. Field surveys in February and September 2025 and consultations with local authorities confirmed land users and usage patterns. No users were found on Treasury/TCDD lands. The RP will guide mitigation, compensation, monitoring, and any future updates or addendums if additional land is needed.

Legal Framework

National Legislation

- Expropriation Law
- Cadastral Law (No. 3402)
- Agricultural Reform Law (No. 3083)
- Notification Law (No. 7201)
- Land Registry Code (Official Gazette No. 28738)

International Standards

World Bank Requirements

ESS5 requires avoiding or minimizing involuntary resettlement, ensuring full compensation, and restoring or improving livelihoods for displaced persons. A resettlement plan must provide information, consultation, feasible alternatives, and support. ESS10 emphasizes early, meaningful stakeholder engagement and grievance mechanisms.

Gap Analysis

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.

Land Need of the Project

The Project requires the acquisition of 36 parcels within the expropriation corridor, covering 130,142 m². Of these, 18 parcels are privately owned (5,614.64 m² to be expropriated), belonging to 102 shareholders, including 14 land users. One private parcel is under litigation. The remaining 18 parcels belong to the Treasury (13) and TCDD (5). Most Treasury/TCDD parcels (11) lie inside secured TPAO/Filyos Port areas, where no formal or informal users were

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identified due to strict security and exclusive institutional use. Field studies in February and September 2025, supported by consultations with local authorities and mukhtars, confirmed no land use on public parcels and identified all private land users. Overall, the project affects lands across four settlements in Çaycuma (Gökçeler, Sazköy, Sefercik, Derecikören), with private land impact concentrated entirely in Gökçeler.

Categories of People Affected By Land Acquisition

- The figures, classifications, and findings presented in this section are indicative and based on the draft Asset Inventory prepared during preliminary field studies. These data are subject to reconfirmation and potential revision through the official asset survey to be conducted by DGII's Expropriation Department prior to the commencement of construction works. A final Asset Inventory will be undertaken before construction, during which the official cut-off date will be announced. Based on the results of this official survey, RP Addendums will be prepared, disclosed, consulted upon, and submitted to the World Bank for review and approval, which will constitute a prerequisite for the commencement of construction works.
- **Land owners:** Landowners with legally registered rights to affected parcels will receive compensation for immovable assets, but national law provides no compensation for livelihood losses—these will be covered by DGII.
- **Owners of fixed assets**
 - **Trees:** Land inspection covered 23 of 36 parcels; 13 parcels (11 within TPAO, 2 blocked) could not be accessed. A total of 11 trees were identified on 7 parcels, and 10 trees on 4 private parcels with 4 land users. Public lands had no users, so no economic loss there. Overall economic loss for affected households is low, and all shareholders and users will be eligible for compensation.
 - **Structures:** Structures on affected lands, including houses, warehouses, fences, and shelters, are eligible for compensation under the RP. Out of 36 parcels, 13 could not be inspected. On the remaining 23 parcels, 6 structures were identified on 5 parcels, including both public and private properties. Public structures remain public, while private structures' owners and users are eligible for compensation. Abandoned or unused structures will only be assessed if impacted by project activities. A detailed inventory and compensation process will be conducted by the PIU.
 - **Other assets:** Other minor assets on private parcels—such as non-fruit trees, bushes, small vegetable gardens, and covering materials—may have value for their users but were not assigned separate valuation for expropriation. Public parcels also have low-value forest trees and bushes, excluded from compensation.
- **Land user**
 - **The land users:** Users of land and immovable assets can be classified as two groups: legal (formal) users and illegal (informal) users.
 - **Users of privately owned lands have been identified as land users;** however, no usage has been observed on public lands. The structures located on public lands (e.g., Gökçeler Train Station and associated areas) are for public use. For the remaining areas, no direct usage has been observed.
 - **Beneficiaries of the common properties:** Private lands have identified as the land users, while public lands show no observed usage. Public structures like Gökçeler Train Station and TCDD facilities are for public or institutional use. No other common-use areas exist.
- **Vulnerable Groups and PAPs that need special attention;** The Project identifies two groups needing special support: vulnerable PAPs (female-headed households, elderly, disabled, illiterate) and significantly affected PAPs (those losing more than 10% of their

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land). Vulnerable PAPs will receive vulnerability assistance, while significantly affected PAPs will receive livelihood restoration.

Potential Impacts of Physical And Economic Displacement

- **Affected Lands and agriculture:** Most actual land users rely on retirement as their main livelihood, with only one household primarily depending on agriculture. Land parcels are mostly unsuitable for large-scale crops and are limited to small vegetable gardens and fruit/non-fruit trees. Sixteen out of 18 private parcels will be fully expropriated, creating significantly affected people. Small gardens and non-fruit trees still have some economic value. Some households experience income loss from these minor activities, including barter practices. Overall, land loss is highly sensitive for all shareholders. Four of 14 PAHs experience significant loss of agricultural income.
- **Informal users:** No informal use has been identified on public lands based on the preliminary field assessments conducted for the draft Asset Inventory. This finding is indicative and will be reconfirmed through the official asset survey to be carried out by Real Estate and Expropriation Department prior to construction. Any informal use identified through this process will be addressed through the preparation of RP Addendums, in accordance with ESS5.
- **Affected trees:** The trees recorded in the Asset Inventory were also confirmed by land users to have economic value.
- **Affected Structures:** Structures are assessed in two categories: public and private lands. Public structures like Gökçeler train station and the bus stop may affect routine use but are not part of RP compensation. An abandoned building in the corridor has low impact. On private lands, partially constructed buildings on parcels 102/24 and 110/5 are significant for owners and users, and their losses will be addressed through the official valuation process and reflected in the RP Addendum. Other minor structures (vegetable gardens, coverings) may hold value for users and will also be included in official assessments per ESS5.

Resettlement and Compensation Strategy

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 and future RP Addendums will comply with both the local legislation and ESS5.

There are different types of rights holders who are affected by land acquisition in different ways. The Entitlement Matrix (Table 8.1, Section 8.1) offers compensation measures to persons affected by the project in various ways, and compensate for a range of losses including adverse livelihood impact. Where additional or updated information becomes available through the final asset inventory and valuation process, the relevant provisions and figures will be reflected in the RP Addendum(s) which will be prepared and subject to the World Bank's approval prior to the commencement of construction works.

Livelihood Restoration Measures

There are people who may be more affected by economic displacement. The Entitlement Matrix 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.

- Landless users of impacted public lands,
- PAPs whose total land holding are affected by the Project more than 10%.

Vulnerability Assistsances

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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:

- Females, especially who are the sole heads of household,
- Elderlies,
- People with handicapped including home bound, bedridden individual, and
- Illiterates.

There may be various problems that vulnerable people may encounter difficulty in access to opportunities provided in the scope of E&S Management Plans. Vulnerable PAPs can have difficulty in access to stakeholder engagement activities, accessing grievance mechanism, receiving compensation or crop payments and benefitting from livelihood restoration activities.

Public Participation and Disclosure of Documents

The Stakeholder Engagement Plan (SEP) of the Project is already in place and the consultation activities to be carried out within the scope of this 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.

Grievance Mechanism

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

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- Besides, there are official channels to apply:
Presidency's Communication Center (ÇİMER)
Foreigners Communication Center (YİMER)

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.

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FREQUENTLY ASKED QUESTIONS

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Question 1: Where can the project map and route, including the exact start and end points, be accessed?

The project alignment, including the exact start and end points, is defined in the approved project maps and technical documents. These documents and maps will be made available through the project website and will also be physically shared with the relevant local authorities (muhtarship) to ensure accessibility for the local community.

Question 2: How will communication with the local community be managed during the project?

Communication with the local community will be maintained through regular information disclosure and engagement activities conducted in line with the Stakeholder Engagement Plan (SEP). These activities will be carried out on a continuous basis throughout the project lifecycle to ensure that project-related information is shared in a timely and accessible manner.

Question 3: There were concerns regarding the effectiveness and transparency of communication, particularly related to employment processes, in previous projects. How will this Project ensure proper and continuous communication with the local community going forward?

Stakeholder engagement, land acquisition-related information disclosure, and employment-related communication will be managed in line with the Stakeholder Engagement Plan (SEP) and the Environmental and Social Management Plan (ESMP). The Project will ensure defined communication channels and an operational Grievance Mechanism throughout the Project lifecycle.

Question 4: What are my legal rights?

Affected persons have the right to information, participation, fair compensation, and access to legal remedies under Turkish law and World Bank ESS5 requirements. These rights may be exercised through DGII, administrative authorities, courts, and the Project Grievance Mechanism (GM).

Question 5: How to access the grievance mechanism and how does this work?

Affected persons may submit grievances to DGII through the Project GM using written, verbal, or electronic channels, including applications submitted via the Presidential Communication Center (CİMER). All grievances will be registered, reviewed, and addressed by DGII within defined timeframes, free of charge and without retaliation.

Question 6: When will expropriation start?

Expropriation is expected to start in the first quarter of 2026, following the completion of parcel-based valuation studies and the formal approval of the expropriation decision by the DGII Real Estate and Expropriation Department. The detailed expropriation schedule will be determined and officially announced by DGII in accordance with the national expropriation legislation. Affected persons will be informed in advance prior to the initiation of expropriation procedures.

Question 7: How is expropriation going to be carried out?

Expropriation will be carried out by the DGII Real Estate and Expropriation Department in line with the applicable national legal framework and in compliance with the World Bank's standards, as described in this Resettlement Plan (RP). The process includes land identification, parcel-based valuation, negotiation with landowners, payment of compensation, and, where necessary, initiation of court proceedings. All steps of the process will be implemented and coordinated by DGII PIU through its authorized units.

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Question 8: How is the compensation amount going to be determined and how will the payment be made?

Compensation amounts will be determined by valuation commissions established by the DGII Real Estate and Expropriation Department, based on land market values, land characteristics, legal status, and assets located on the land. Compensation will be paid in cash by DGII to the entitled persons prior to land take and before the commencement of construction works, either through direct agreement or by court deposit.

Question 9: How do I receive the compensation?

Compensation payments are made by DGII through bank transfer to the account of the entitled person or deposited by the court in cases subject to judicial proceedings. DGII will officially notify affected persons regarding payment procedures and required documentation.

Question 10: What if I do not accept the expropriation value?

If the affected landowner does not accept the compensation amount determined by DGII, the administration may initiate a valuation and registration case before the competent court. The compensation amount determined by the court will be deposited by DGII in the name of the entitled persons, in accordance with national legislation.

Question 11: Who will pay the court costs for the valuation and registration case?

Court costs related to expropriation valuation and registration cases will be covered by DGII, in accordance with national expropriation legislation.

Question 12: I do not want the Project to go through my land, what should I do?

Project alignment and routing decisions are made by DGII based on public interest considerations. Affected persons may submit objections or applications to DGII or pursue administrative and judicial remedies in accordance with national legislation.

Question 13: Will standing crops be compensated?

Yes. Standing crops, trees, and perennial plants will be valued and compensated by DGII in accordance with national valuation principles, taking into account crop type, age, productivity, and economic value.

Question 14: Considering concerns raised by local communities, will the Project have any impacts on bird migration routes or on endemic and other sensitive species within the Project area, and what measures are planned to monitor and manage these potential impacts?

Potential impacts on bird migration routes and sensitive species have been assessed through the EIA process. Baseline studies were conducted by qualified experts, and biodiversity monitoring will be implemented during construction and operation phases in line with national legislation and international standards.

Question 15: If the land is registered in my name but the trees planted on the land belong to someone else, who receives the compensation for trees?

Compensation for trees will be paid by DGII to the person who holds ownership or legitimate usage rights over the trees, provided that such rights can be verified during the valuation and expropriation process.

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Question 16: I own the affected land parcel, but I rent the land parcel to someone else, who grows their own crops on the land. Who receives the compensation for the crops?

DGII will pay compensation for the land to the landowner, while compensation for crops will be paid to the tenant or land user who cultivated the crops, subject to verification of use and entitlement.

Question 17: I am using State land without permission. Can I receive compensation for land or crops?

No compensation will be paid by DGII for land used without legal rights. However, compensation for crops or assets may be considered by DGII if eligibility conditions under national legislation and RP principles are met.

Question 18: I am using someone else's land without permission. Can I receive compensation for land or crops?

No compensation will be paid for land. However, compensation may be paid by DGII for crops or other assets located on the land, provided that the actual use and ownership of such crops or assets can be verified and the eligibility conditions under the applicable legal framework are fulfilled.

Question 19: The land is registered in my deceased grandfather's name, I am the heir. What should I do?

Heirs should complete inheritance procedures and provide legal documentation proving heirship. DGII will carry out expropriation and compensation payments once legal ownership or inheritance rights are established.

Question 20: How will expropriation continue if my brother (or other family member), who is the shareholder, does not reside here?

DGII conducts expropriation based on official land registry records. Shareholders will be notified through legally prescribed notification procedures, and compensation will be distributed in proportion to ownership shares.

Question 21: The land is mortgaged, who will receive the compensation?

Compensation payments will be processed by DGII in accordance with the mortgage status recorded in the land registry. The rights of mortgage holders will be taken into account as required by law.

Question 22: What will happen if construction activities exceed the land acquisition boundary or temporarily rented lands for construction?

Any additional land acquisition or impacts outside the approved boundaries will be identified by DGII and addressed through additional valuation, compensation, and, RP Addendum(s), in line with ESS5 and RP requirements.

Question 23: If there will be any additional expropriation of private land outside the currently identified land acquisition area, how will this be communicated?

Any additional land acquisition requirements will be publicly disclosed through official communication channels, including notice boards, the project website, and information shared with relevant local authorities. Affected persons will be informed in advance in accordance with national legislation and the Resettlement Plan.

Question 24: Due to other ongoing projects, our village roads have been damaged. What will be your approach to this issue under this Project?

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Road conditions within the Project Area of Influence will be monitored. Any road damage identified as being Project-related will be addressed in coordination with relevant authorities and in line with the ESMP, including repair and reinstatement works where necessary.

Question 25: How will employment-related practices, including recruitment and working conditions, be handled during the Project?

Employment-related practices, including recruitment and working conditions, will be managed by the contractor in accordance with national labor legislation and the Project's environmental and social requirements. Relevant information will be shared with the local community where applicable.

Question 26: Will there be any special support for vulnerable groups?

Yes. Vulnerable individuals and households identified within the Project Area of Influence will receive additional attention and support throughout the project. Project-related information will be shared with all stakeholders in accordance with the Stakeholder Engagement Plan (SEP). The Project will ensure that information is provided in a clear and understandable manner and reaches all community members, including people who may have difficulties accessing written information.

Question 27: In previous land acquisition processes, no support was provided other than compensation. Will this Project provide any additional support?

Land acquisition will be implemented in accordance with the Resettlement Plan. Beyond compensation payments, the Project includes consultation-based and needs-oriented support measures, with particular attention given to vulnerable Project Affected Persons.

Question 28: After the completion of construction, which institution will be responsible for the operation and management of the railway line?

Following the completion of construction works, the operation and management of the railway line will be transferred to the Turkish State Railways (TCDD), and operations will be carried out in accordance with national regulations and TCDD procedures.

ARE YOU ELIGIBLE FOR COMPENSATION?

All people affected by the Project are eligible for compensation based on pre-defined entitlements to ensure that they are not significantly disadvantaged by the Project.

The following groups are eligible for compensation:

- Owners / shareholders of permanently affected agricultural private land parcels
- Formal tenants (A person who occupies land or property rented from a landlord) / informal users of permanently affected agricultural private land parcels
- Formal tenants / informal users of permanently affected public land parcels which are currently used for agriculture
- Owners / shareholders of permanently affected non-agricultural private land parcels
- Formal tenants / informal users of permanently affected non-agricultural private land parcels
- Agricultural producers of crops
- Owners and agricultural producers of perennial trees/plants
- Owners of non-residential buildings and secondary structures
- Formal users of non-residential buildings and secondary structures
- Informal users of structures

WHAT ARE THE KEY STEPS TO THE RESETTLEMENT PROCESS?

- Step 1: RP Disclosure

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- Step 2: Acquisition of Public Interest Decision and Expropriation Decision
- Step 3: Valuation Verification and Development of Expropriation Files
- Step 4: PAP Consultation and Notification
- Step 5: Negotiations with PAPs
- Step 6: Disbursement of Compensation
- Step 7: Transfer of Land Titles from Landowner to Treasury
- Step 8: Land Delivery Protocol
- Step 9: Re-seeding Avoidance
- Step 10: Land Entry
- Step 11: Land Rental and Impacts During Construction
- Step 12: Exit of Temporary Land