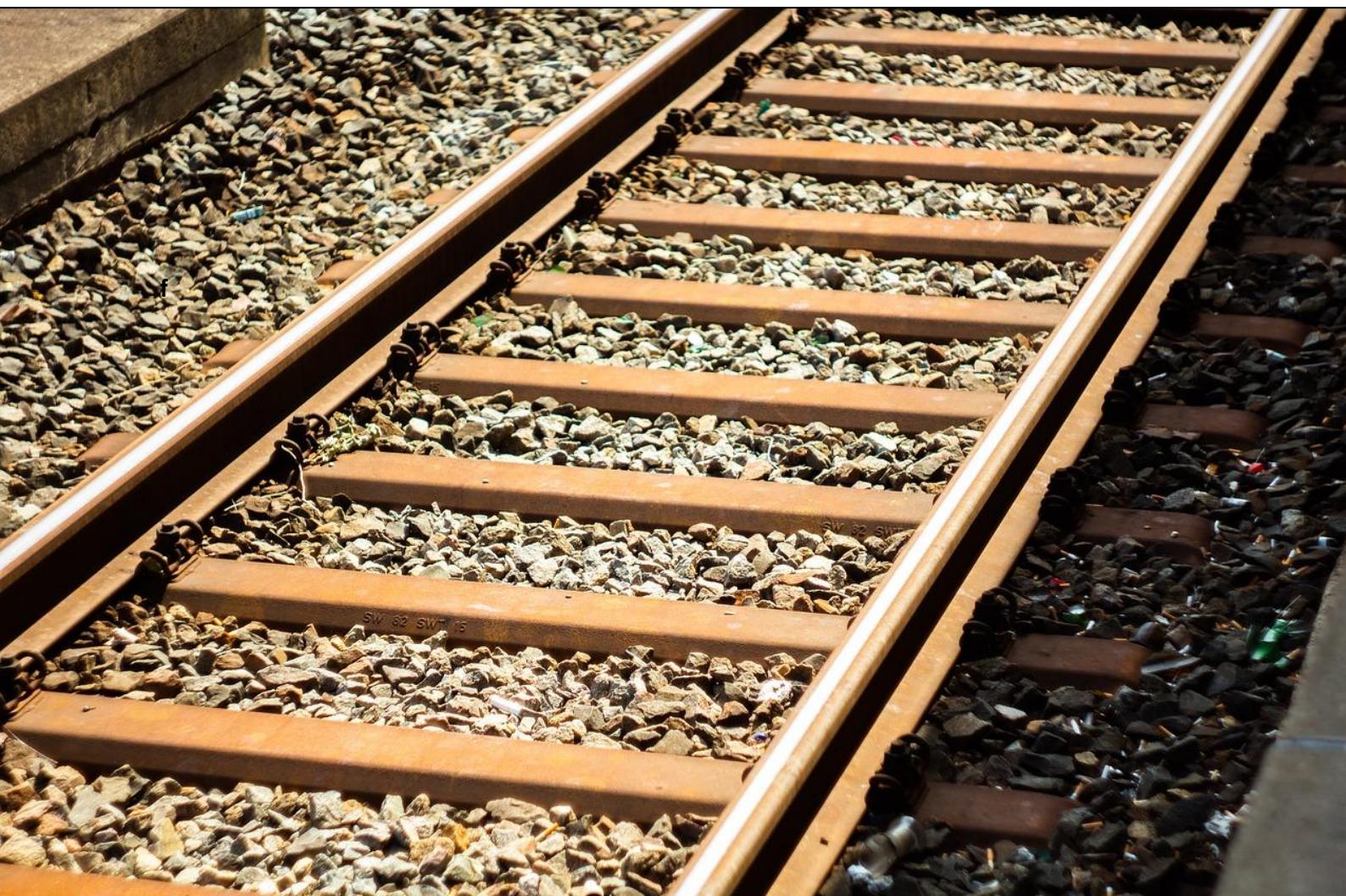




REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
AND INFRASTRUCTURE

AYEM
Altyapı Yatırımları Genel Müdürlüğü

 **CİNAR**[®]
ENGINEERING
CONSULTANCY INC.



**FİLYOS PORT AND INDUSTRIAL ZONE RAILWAY CONNECTION
PROJECT**
STAKEHOLDER ENGAGEMENT PLAN
CNR-ZNG-SEP-002
Final

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ABBREVIATIONS & ACRONYMS

| | |
|----------------|--|
| Aoi | Area of Influence |
| BAKKA | Western Black Sea Development Agency |
| BOTAŞ | Petroleum Pipeline Corporation |
| CHS | Community Health and Safety |
| CİMER | Presidency's Communication Center |
| ÇINAR | Çınar Engineering Consultancy Inc. |
| CLO | Community Liaison Officer |
| CRF | Complaint Register Form |
| CSO | Civil Society Organization |
| ÇYDD | Association for Supporting Contemporary Life |
| DGII | Directorate General of Infrastructure Investments |
| DSİ | State Hydraulic Works |
| DVIG | Disadvantaged / Vulnerable Individuals or Groups |
| E&S | Environmental and Social |
| EIA | Environmental Impact Assessment |
| ESCP | Environmental and Social Commitment Plan |
| ESF | World Bank 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 |
| FGD | Focus Group Discussions |
| GBV | Gender Based Violence |
| GBVH | Gender Based Violence and Harassment |
| GM | Grievance Mechanism |
| GRS | World Bank's Grievance Redress Service |
| IIP | World Bank Independent Inspection Panel |
| IPF | Investment Project Financing |
| İŞKUR | Turkish Employment Agency |
| KASTOB | Union of Black Sea Region Non-Governmental Organizations |
| KPI | Key Performance Indicator |
| KVKK | Personal Data Protection Law |
| LMC | Last-Mile Infrastructure Connectivity |
| LMP | Labor Management Procedure |
| LRP | Livelihood Restoration Plan |
| MoM | Minutes of Meeting |
| MoTI | Ministry of Transport and Infrastructure |
| NGO | Non-Governmental Organization |
| OHS | Occupational Health and Safety |
| OIP | Other Interested Parties |



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|-----------------|--|
| OIZ | Organized Industrial Zone |
| PAH | Project Affected Households |
| PAP | Project Affected Parties |
| PIU | Project Implementation Unit |
| RLIP | Türkiye Rail Logistics Improvement Project |
| RP | Resettlement Plan |
| SEA/SH | Sexual Exploitation and Abuse |
| SEP | Stakeholder Engagement Plan |
| SERA-OSB | Agriculture-Based Specialized Organized Industrial Zone |
| ŞÖNİM | Violence Prevention and Monitoring Centre |
| TCDD | Turkish State Railways |
| TPAO | Turkish Petroleum Corporation |
| TP-OTC | Turkish Petroleum Offshore Technology Center |
| UNESCO | United Nations Educational, Scientific and Cultural Organization |
| WB | World Bank |
| ZONÇEB | Zonguldak Provincial Administration and Municipalities Environmental Infrastructure Basic Services Union |
| ZONDEF | Zonguldak Associations Federation |



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EXECUTIVE SUMMARY

This Stakeholder Engagement Plan (SEP) has been developed to ensure the process of continuous interaction with the project-affected and other interested parties during the implementation of the Filyos Port and Industrial Zone Railway Connection under Component 1 of Improving Railway Connectivity Project (hereafter referred to as “(Filyos Sub-project” or “the Project”). By undertaking activities proposed in this SEP, Ministry of Transport and Infrastructure Directorate General of Infrastructure Investments (DGII) that is carrying out the Project, demonstrates its openness, responsiveness and willingness to embark on the constructive dialogue with its stakeholders. The Project Implementation Unit (PIU) in Directorate General of Infrastructure Investments (DGII) will be responsible for implementing the SEP.

Ministry of Transport and Infrastructure (MoTI)-DGII emphasizes the significance of close involvement of the communities and their representatives in the Project Area of Influence via the process of informed consultation, participation and good faith negotiation throughout the Project lifecycle. MoTI-DGII also recognizes that its collaboration with the local communities residing in the area of its Project activities is of paramount importance to ensuring that this on-going relationship is built on the principles of trust, respect, transparency and mutual consensus. To achieve this, the SEP is intended as a public document that is open for discussion with the stakeholders and will be subject to regular revision to remain up-to-date and to reflect outcomes of the continued engagement.

The SEP consists of the following elements:

- Explanation of the objectives SEP;
- Brief description of the Project;
- Overview of applicable standards of stakeholder engagement, including requirements of the World Bank (WB);
- Summary of previous stakeholder engagement activities undertaken by the Project to date;
- Identification of Project stakeholders and their categorization;
- Description of methods for future engagement;
- Roles and responsibilities for effective implementation of the SEP;
- Public Grievance Mechanism enabling the lodging and addressing of complaints and feedback from external stakeholders; and
- Means of monitoring and reporting.

MoTI-DGII invites its stakeholders to take part in ensuring that this SEP functions as a live interactive document and welcomes feedback on the proposed process of engagement.



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1 INTRODUCTION

The Stakeholder Engagement Plan (SEP) is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of the Project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a variety of external stakeholders over the entire life of the Project. Initiating the engagement process in early phases helps ensure the timely public access to all relevant information and gives the stakeholders an opportunity to input into the Project design and the assessment of impacts.

The SEP will promote two-way communication between the Project Implementation Unit (PIU) and different stakeholders continuously. Information regarding the project, environmental and social risks and impacts, proposed mitigation measures, resettlement plans, grievance mechanism, will be shared with project stakeholders on a regular basis.

The plan will cover the identification of stakeholders to be contacted during the preparation, construction and operation stages of the Project and the frequency of consultations and will be updated with completion of stakeholder participation activities. The fact that stakeholder participation is an active process is also determinative in that it is updated periodically as the Project moves with important milestones.



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1.1 Project Description

The Türkiye Rail Logistics Improvement Project (RLIP) is implemented by the Ministry of Transport and Infrastructure through its Directorate General of Infrastructure Investments, 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 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 1st Component 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 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 project includes approximately 12 km of railway and 4.5 km of highway, designed during the Phase-1 studies to operate in an integrated manner with the railway for transportation purposes. The Environmental and Social Impact Assessment (ESIA) site studies were completed by ÇINAR in January and February 2020, and the ESIA Reports were disclosed in May 2020. During Phase-2 of the Project, the railway line was revised based on the commitments and issues outlined in Environmental and Social Commitment Plan (ESCP), and stakeholders’ suggestions and requests. During Phase-2, Çınar Engineering Consultancy Inc. (ÇINAR) has been awarded as a consultant to carry out the revision studies of environmental and social instruments prepared during Phase-1 period.

1.2 Objectives of SEP

This SEP 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 this Stakeholder Engagement Plan is to define a program for stakeholder engagement, including public information and consultations, throughout the Project cycle.

One of the important objectives of SEP is to ensure that appropriate information on Environmental and Social (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.



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SEP is a living document and will be regularly monitored, reviewed, and updated as necessary by the Project Owner. Once approved by the Bank, this SEP will be published on the website.

This SEP has been developed to cover all stages of the Project and aims to comply with the following requirements:

- World Bank (WB) Environmental and Social Standards
- Constitution of the Republic of Türkiye

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.

SEP, developed in accordance with Environmental and Social Standard 10 of the WB Environmental and Social Framework, and GM are interconnected documents, both aiming to ensure the compliance of the Project with respect to access to information and disclosure, transparency, accountability and stakeholder consultation throughout the project lifecycle. The defined objectives can be monitored through regular reporting and third-party monitoring.

The Project Owner commits to implementing the information, explanations, and implementation methods as presented in this SEP and approved by the Bank in all stages of the Project.



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2 REGULATIONS AND REQUIREMENTS

DGII intends to fund Filyos Sub-project partly with foreign loans and has committed to undertake an ESIA compliant with national and international standards and best Practices. Consequently, this SEP will abide by the legal framework provided below.

2.1 National Legislation

2.1.1 The Constitution of the Republic of Türkiye

“The Constitution of the Republic of Türkiye” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

Freedom of Thought and Opinion

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions.

Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

Right of Petition

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.

2.1.2 Civil Law

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

2.1.3 Law on the Right to Information

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organizations, which qualify as public institutions.

2.1.4 Law on the Use of Right to Petition

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the



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public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

2.1.5 Law on the Protection of Personal Data (No. 6698)

Law on the Protection of Personal Data (KVKK) regulates processing, storage, transfer, and security of personal data.

2.1.6 Environmental Impact Assessment (EIA) Regulation

The Environmental Impact Assessment Regulation, published in the Official Gazette No. 31907 on 29 July 2022, requires stakeholder engagement in the process of assessing the environmental impacts of projects. Accordingly, for projects listed in Annex-1, the preparation of a Stakeholder Engagement Plan is mandatory, and it must be submitted as part of the EIA application dossier.

2.2 World Bank Requirements

The process of stakeholder engagement outlined in "ESS10: Stakeholder Engagement and Information Disclosure" within the World Bank Environmental and Social Framework (ESF) is described as follows:

- ESS10 applies to all projects supported by the investment finance fund.
- ESS10 should be integrated with "ESS1: Assessment and Management of Environmental and Social Risks and Impacts" and "ESS2: Labor and Working Conditions."
- ESS2 includes requirements for worker interactions and includes specific provisions for urgent situations, which are covered under ESS2 and ESS4.
- Stakeholder engagement is a comprehensive process throughout the project's lifecycle.
- Initiating stakeholder engagement in the early stages is the most effective approach.
- It helps establish strong, constructive, and sensitive relationships, which are crucial for the successful management of environmental and social risks when appropriately designed and implemented.
- Effective stakeholder engagement contributes to the environmental and social sustainability of the project, enhances public reception, and supports the successful design and implementation of the project.
- An essential element is maintaining open and transparent communication between the project and stakeholders.

The specific Environmental and Social Standards (ESS) requirements related to SEP are outlined in Table 1.

Table 1. World Bank Requirements

| No | ESS | Scope | Stakeholder Engagement Requirements |
|-------|---|---|--|
| ESS 1 | Assessment and Management of Environmental and Social Risks and Impacts | ESS1 sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to | ESS1 specifies the requirements for Stakeholder engagement and disclosure with reference to the risk classification of projects. |

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| No | ESS | Scope | Stakeholder Engagement Requirements |
| | | achieve environmental and social outcomes consistent with the Environmental and Social Standards. | |
| ESS 2 | Labor Working Conditions | ESS2 requires projects to provide safe, healthy, and fair working conditions, ensure non-discrimination and equal opportunity, prohibit child and forced labor, respect workers' rights including freedom of association, give special protection to vulnerable workers, and establish accessible grievance mechanisms for all project workers. | ESS2 prescribes that workers' should be provided with information about and documentation about their employment and provided access to a Workers' GM. |
| ESS4 | Community Health, Safety and Security | ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. | ESS4 requires consultations with Project Affected Parties (PAPs) on Project Community Health and Safety (CHS) risks and access to GM |
| ESS5 | Land Acquisition and Involuntary Resettlement | ESS5 requires projects to avoid or minimize involuntary resettlement, mitigate displacement impacts, provide fair compensation and livelihood restoration, protect vulnerable affected people, and ensure timely information disclosure, meaningful consultation, and accessible grievance mechanisms throughout the resettlement process. | ESS5 requires consultations with PAPs on Resettlement Plan (RP) and access to GM |
| ESS10 | Stakeholder Engagement and Information Disclosure | ESS10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. | ESS10 defines the structure and content of SEP. |



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3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholders have been duly identified, and discussions have been initiated with these stakeholders, spanning across the phases of the Environmental and Social Impact Assessment (ESIA) process and extending into subsequent stages involving the preparation of the Resettlement Plan (RP), all as of the year 2020.

In August 2022, ESIA studies were initiated for the Filyos subproject in line with World Bank standards. As the detailed designs will be finalized following the mobilization of the Supervision Consultants, additional studies were initiated to provide the necessary guidance for the development of subsequent project-specific documents.

All activities carried out since this date are given in Appendix-7: Minutes of Meetings, and Appendix-8: Photographs taken during the interviews. Besides, a full list of stakeholders interviewed is provided in Appendix-6: Interviewed Stakeholders.

The scope of the relevant activities includes informing stakeholders affected by the updated alignment. During this information-sharing process, the environmental and social impacts addressed in the ESIA and related project documents will be communicated to stakeholders. All project-specific documents produced for the project will be disclosed, and stakeholders will be notified of such disclosure. Additionally, stakeholder engagement activities will be conducted to ensure the participation of all stakeholders, including vulnerable groups. These activities will take various forms, ranging from local meetings to face-to-face consultations (see Table 4).

The primary objective of stakeholder engagement is to ensure that the project is presented to stakeholders in a transparent and accessible manner from the outset, and that feedback collected from stakeholders is effectively integrated into project implementation.

3.1 Stakeholder Consultation Meeting for Information Disclosure

As part of the Project, a broadly attended stakeholder engagement/consultation meeting was held on 15 January 2026 in Filyos town, Zonguldak Province. Prior to the meeting, stakeholder institutions and Mukhtars were officially invited through formal invitation letters. A few days before the meeting, all stakeholder institutions and Mukhtars were also contacted by phone and re-invited to the meeting.

Public announcements regarding the meeting were posted at various locations, including the Derekören Village Mukhtar's Office, Gökçeler Village Mukhtar's Office, Gökçeler railway station, Gökçeler bus stop, and meeting hall in Filyos town.

The Project information leaflet prepared for the Project was distributed during the meeting. A presentation was delivered with the participation of the Consultant and social specialists from AYGM. During the presentation, technical information about the Project, its environmental and social impacts and the mitigation measures to be implemented, the prepared ESIA documents, and the operation of the grievance mechanism were summarized. Following the presentation, a question-and-answer session was conducted.



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The meeting lasted for more than one hour and was attended by 52 (11 females and 41 males) participants. During the meeting, all participants were requested to sign the attendance sheet; however, some participants did not sign the document due to their status as public officials.

Information about the meetings is provided in Table 2.

Table 2. Information about the Stakeholder Participation Meeting

| Province | District | Town | Meeting Place | Address | Date | Time | Number of Participants |
|-----------|----------|--------|--|---|------------|--------------|------------------------------|
| Zonguldak | Çaycuma | Filyos | Filyos Municipality Multi-Purpose Hall | Hisarönü Mahallesi Namık Kemal 2 Sokak No:4 Çaycuma / ZONGULDAK | 15.01.2026 | 14:00/ 15:15 | 52 (11 females and 41 males) |

At the beginning of the meeting, the concerns raised by an elderly female participant regarding the construction-related impacts shaped the main agenda of the meeting. In addition, the Project duration, alignment, and employment capacity were frequently discussed. Questions related to land acquisition also constituted a significant part of the meeting. The local community also stated that the impacts of other projects in the area are still ongoing.

In summary, the Project is generally accepted by the local community, provided that due attention is paid to its environmental impacts, that it contributes to local employment, and that social investment opportunities are created in the region.

The project introduction and all environmental and social documents prepared as part of the project will be available on AYGM's website.

Detailed information about stakeholder participation meetings, the issues raised during these meetings, and stakeholders' opinions and suggestions are provided in the separate Appendix-9 file of this document.



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4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

To ensure fair and inclusive stakeholder engagement, it is essential to identify stakeholders in the initial project stage. This identification process is crucial for the effective development of a SEP, which will accurately analyze all project stakeholders, including those with an interest in or an impact on the project, whether direct or indirect.

Stakeholder identification serves as a critical step in managing the overall stakeholder engagement process. It helps mitigate the risk of a limited group of stakeholders dominating the consultation process.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

Affected Parties: The term project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities¹.

The population affected by the general environmental and social impacts within the AoI has been defined as “project-affected parties” (PAP) in accordance with ESS10 terminology.

Persons affected by land acquisition under the project have been defined as Project-Affected Households (PAHs), and related details are provided in the RP.

Other Interested Parties – individuals/groups who may have an interest in the project

Vulnerable Groups: Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits².

The following stakeholders, expected to have an interest in or be directly/indirectly affected by the project, are initially recognized, with the possibility of additional stakeholders being identified throughout the project’s lifespan:

- (i) Potentially Affected Parties
 - Project-Affected Households (PAHs) affected by land acquisition
 - Vulnerable Groups who may be disproportionately impacted or have limited ability to benefit from the project
 - People / communities living in the vicinity of the Project area
 - Project-Affected Parties (PAPs) within the AoI
- (ii) Other Interested Parties
 - International organizations
 - National organizations
 - National / regional governmental bodies
 - Local governments or authorities

¹<https://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

²Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project’s benefits.

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Following the determination of the project route within Phase 2, a social impact assessment field study was carried out in February 2025 to assess the socio-economic situation related to the Project, including requirements associated with land acquisition. The social Area of Influence (AoI) of the project includes the settlements of Derekören, Gökçeler, and Sazköy within the Çaycuma District of Zonguldak Province, as well as the Sefercik settlement in the Filyos town of the same district as outlined in the ESIA. The settlements Öteyüz and Aşağııhsaniye that are not located within the expropriation corridor but are situated along the original previous project route and have limited interaction with the project's environmental and social impacts.

As a result of the revisions made to the Project alignment, the records pertaining to the Phase-1 consultations were not incorporated into the ESIA and SEP documents. The meeting minutes from this period are retained within AYGM's internal archives.

4.1 Project Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct / indirect impacts from the Project.

Project and contractors' employees are also considered as project-affected parties as their working conditions depend on the Project' procedures and principles set out by the employers. Specifically, the following individuals and groups are defined within affected parties' category for the Project.

Project Affected Parties:

Owners / Shareholders & Actual users of affected land: Within the expropriation corridor there are 18 private parcels owned by 102 owners / shareholders and their heirs who all have been classified as PAHs.

For 18 of these parcels (one of the 18 parcels is classified as a litigated parcel), 14 actual users were identified, while the remaining co-owners are absentee holders who do not use their shares. For these individuals, specific communication requirements have been established under the scope of land acquisition and livelihood restoration, and the details are provided in the Resettlement Plan.

In addition to **owners / shareholders and actual users**, all **local residents and mukhtars** in the aforementioned settlements (Derekören, Gökçeler, Sazköy, and Sefercik) will be directly affected by the Project's environmental and social impacts. The current population of PAPs in this area totals 887 (see Table 3).

Besides, 887 individuals residing in Derekören, Gökçeler, Sazköy, and Sefercik have been considered PAPs as **users of public structures** identified, such as **Gökçeler Station** buildings.

Project workforce including employees of contractor /sub-contractor, suppliers, and service providers included during Land Preparation and Construction, and Operation will also be considered as part of the PAPs.



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During the project's land preparation and construction phase, approximately 200 people will be involved, with 150 working for the contractor and the remaining personnel working for the design and supervision consultant team.

The number of Turkish State Railways (TCDD) personnel foreseen to be employed during the operation phase is not determined yet. The evaluations have been conducted based on the assumption that approximately 50 people will be working.

Passengers during the land preparation and construction phase and operation phase are also considered as part of the PAPs. No up-to-date source is available regarding the current passenger numbers at the stations. During the operation phase of the project, the total number of passengers visiting the station will be approximately 100 people.

Population figures of the settlements located within the social AoI are given via Table 3.

Table 3. Population data based on TurkStat, 2024³

| Province | District | Settlement ⁴ | Type of settlement | Population |
|-----------|-----------------------|-------------------------|--------------------|------------|
| Zonguldak | Çaycuma | Gökçeler | Village | 179 |
| Zonguldak | Çaycuma | Sazköy | Village | 268 |
| Zonguldak | Çaycuma / Filyos town | Sefercik | Neighborhood | 169 |
| Zonguldak | Çaycuma | Derekören | Village | 271 |

Due to the project's route change, the settlements of Aşağııhsaniye and Öteyüz, which fall outside the direct social AoI, however, considering the likelihood of limited potential interaction with the project's environmental and social effects, they will still be included within the Project's broader indirect impact area.

Within the social AoI, local authorities that may fall under the PAP category are the mukhtars, who are the local leaders of the settlements. There are four mukhtarship of Gökçeler, Sazköy, Sefercik, and Derekören.

4.1.1 Disadvantaged / Vulnerable Individuals or Groups

In the context of participation in information-sharing processes, the groups defined as vulnerable under the SEP are females, especially who are the heads of household, elderly, people with handicapped, including home bound, bedridden individuals, and illiterates.

These groups are also considered vulnerable in terms of environmental & social and community health & safety impacts.

In addition to this definition, individuals who have experienced a loss of more than 10% of their land due to land acquisition (Significantly Affected People) and actual users without land

³ Address-Based Population Registration System, Population of localities, Population of municipalities, villages and quarters, 2024, Turkish Statistical Institute, <https://biruni.tuik.gov.tr/medas/?locale=en>

⁴ The settlements are listed in descending order based on the number of affected parcels in each settlement.

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ownership have also been classified as vulnerable groups in the context of the RP. Related details and specific communication needs of these groups are provided in the RP.

The identified DVIG among PAP and PAH is given in Appendix-7.

4.2 Other Interested Parties

Other individuals or groups that may have an interest in the project are identified as “other interested parties”. The list of the possible interest groups is provided in following:

Local government institutions;

- Çaycuma District Governorship
- Çaycuma Municipality
- Çaycuma Municipality - National Real Estate Directorate
- Filyos Municipality
- Zonguldak Municipality

Local state institutions;

- 23rd Provincial Directorate of General Directorate of State Hydraulic Works (DSİ)
- Karabük Cultural Heritage Conservation Regional Board
- Petroleum Pipeline Corporation Work Site
- Zonguldak Provincial Administration and Municipalities Environmental Infrastructure Basic Services Union (ZONÇEB)
- Zonguldak Provincial Directorate of Environment, Urbanization and Climate Change
- Zonguldak Provincial Directorate of Industry and Technology
- Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Culture and Tourism
- Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Trade
- Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Health
- Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Agriculture and Forestry
- Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Environment, Urbanization and Climate Change
- Zonguldak Provincial Directorate of Turkish Employment Agency (İŞKUR)
- Zonguldak Provincial Special Administration
- Zonguldak Regional Directorate of Forestry
- Zonguldak Regional Port Authority Republic of Türkiye Ministry of Transport and Infrastructure

Investment and Industrial Areas

- Filyos Free Zone
- Filyos Industrial Zone
- Filyos Turkish Petroleum Port
- Turkish Petroleum Corporation (TPAO) Individual Investment Zone
- Turkish Petroleum Offshore Technology Center (TP-OTC)
- TP-OTC Shorebase Logistics Center Management

Development Agencies

- Western Black Sea Development Agency (BAKKA)



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Chamber and Unions

- Çaycuma Agricultural Credit Cooperative No. 2958
- Zonguldak Chamber of Commerce and Industry

Local Businesses

- Çaytaş Ateş Tuğla Sanayi ve Ticaret A.Ş.

Local Media

- Demokrat Çaycuma / Çaycuma-Zonguldak
- Karadeniz Son Havadis / Online News Website
- Yeni Adım / Central district -Zonguldak

Non-Governmental Organizations (NGO)

- Türkiye Beyazay Association Zonguldak Branch
- Union of Black Sea Region Non-Governmental Organizations (KASTOB)
- Western Black Sea Culture and Solidarity Association
- Zonguldak Environmental Protection Association

Civil Society Organizations (CSO)

- Çaycuma Mukhtars Association
- Filyos Culture and Solidarity Association
- Türkiye Philanthropic Association Çaycuma Branch

4.3 Stakeholder Matrix

Table 4 provides a summary of these details regarding the consultation and disclosure process.

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Table 4. Stakeholder Matrix and Engagement Activities

| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|-----------------------------------|--|---|---|---|--|---|
| Pre-construction | Stakeholder consultations for preparation of project E&S documents | <ul style="list-style-type: none"> ▪ Ministry of Transport and Infrastructure ▪ Ministry of Energy and Natural Resources ▪ Turkish Electricity Transmission Corporation ▪ Electricity Generation Company ▪ Ministry of Environment, Urbanization and Climate Change ▪ Ministry of Industrial and Technology ▪ Ministry of Agriculture and Forestry ▪ Ministry of Treasury and Finance | <ul style="list-style-type: none"> ▪ E-mail to external stakeholders ▪ Official correspondences ▪ Online meetings | Before the Project construction activities will be started | Prior to the commencement of the Project | DGII |
| Pre-construction | Stakeholder consultations for preparation of project E&S documents | <ul style="list-style-type: none"> ▪ The PAPs affected by land acquisition ▪ Communities living in the neighborhood settlements of the project railway routes ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings | Before the Project construction activities will be started | Once at the beginning of the Project | Consultant DGII |
| Pre-construction | Disclosure of the E&S instruments for the Project: <ul style="list-style-type: none"> ▪ ESIA& Environmental and Social Management Plan (ESMP) ▪ SEP including Grievance Mechanism ▪ Resettlement Plan (RP) | <ul style="list-style-type: none"> ▪ All stakeholders ▪ The PAPs affected by land acquisition ▪ Communities living in the neighborhood settlements of the project Aol ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ DGII Website ▪ E-mail to external stakeholders ▪ Online meetings ▪ Online interviews ▪ Letter/post ▪ Posters/flyers ▪ Stakeholder visits ▪ Consultation meetings | Once plans are approved pre-construction | At the beginning of the Project following the plans are approved | DGII |
| | | <ul style="list-style-type: none"> ▪ Vulnerable/disadvantaged individuals/ groups | <ul style="list-style-type: none"> ▪ Mukhtar visits ▪ Consultation meetings ▪ FGD ▪ Letter/post ▪ Posters/flyers | Once plans are approved pre-construction | At the beginning of the Project following the plans are approved | DGII |
| | | <ul style="list-style-type: none"> ▪ Project employees ▪ Contractors' workers | <ul style="list-style-type: none"> ▪ DGII Website ▪ Online meetings ▪ Face to face meetings ▪ Posters/ brochures/ flyers ▪ Consultation meetings | Once plans are approved pre-construction | At the beginning of the Project following the plans are approved | DGII Contractor |
| Pre-construction | To inform people about land acquisition requirements and implementations | <ul style="list-style-type: none"> ▪ Land owner & shareholder of private land ▪ Actual users ▪ Users of public structures | <ul style="list-style-type: none"> ▪ Consultations to be conducted with the people subject to land acquisition | Prior to land entry Immediately after the completion of the census activities. | Prior to the commencement of the Project | DGII PIU |
| Pre-construction | Disclosure of the RP | <ul style="list-style-type: none"> ▪ PAPs affected by land acquisition | <ul style="list-style-type: none"> ▪ Consultation meetings ▪ DGII website ▪ FGD | Once plans is approved pre-construction | At the beginning of the Project following the plans are approved | DGII PIU |
| Land preparation and construction | Community health and safety information meetings for local residents (such as case of relating to traffic and passageways) | <ul style="list-style-type: none"> ▪ Vulnerable/ disadvantaged individuals/ groups ▪ The PAPs affected by land acquisition ▪ Communities living in the neighborhood settlements of the project Aol ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ Letter/post ▪ Posters/flyers | In case of Project activities that may negatively affect public health and safety 1 week before the days when there will be activities such as passage restrictions, road closures, traffic congestion, equipment shipment with heavy vehicles | When needed | Contractor (for implementation) DGII PIU (for supervision, including all process monitoring) |
| Land preparation and construction | Sharing information on the Project opportunities, activities and processes | <ul style="list-style-type: none"> ▪ Project-affected settlements Gökçeler, Sazköy, Sefercik, and Derecikören ▪ All Stakeholders | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings ▪ FGD ▪ Letter/post ▪ Posters/flyers | When the project opportunities are available in a given location. | When needed | Contractor (for implementation) DGII PIU (for supervision, including all process monitoring) |
| | | <ul style="list-style-type: none"> ▪ All Stakeholders | <ul style="list-style-type: none"> ▪ DGII Website ▪ E-mail to external stakeholders ▪ Online meetings ▪ Consultation meetings | When the project opportunities are available in a given location. | When needed | Contractor (for implementation) DGII PIU (for supervision, including all process monitoring) |
| Land preparation and construction | Disclosure of the final documents of the Project | <ul style="list-style-type: none"> ▪ All Stakeholders | <ul style="list-style-type: none"> ▪ DGII Website ▪ E-mail to external stakeholders | At the beginning of the construction phase | At the beginning of the construction following the plans | DGII |

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| Project Stage | Topic of Consultation / Message | Target stakeholders | Method / Tool | Timetable | Frequency | Responsibilities |
|---------------|---|---|---|--|-------------------------------------|------------------|
| | | | | | are approved | |
| Operation | Disclosure of the E&S instruments for the Project operation phase: ESIA & ESMP SEP including Grievance Mechanism | <ul style="list-style-type: none"> ▪ Governmental bodies ▪ Local government institutions ▪ DGII workers ▪ Vulnerable/disadvantaged individuals/ groups ▪ Municipalities ▪ NGOs & CSOs | <ul style="list-style-type: none"> ▪ DGII Website ▪ E-mail to external stakeholders ▪ Letter/post | After the updated plans are approved | As documents are updated or changed | DGII |
| | | <ul style="list-style-type: none"> ▪ Vulnerable/ disadvantaged individuals/ groups | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings ▪ FGD ▪ Letter/post ▪ Posters/flyers | After the updated plans are approved | As documents are updated or changed | DGII |
| Operation | Sharing information on the Project opportunities and activities | <ul style="list-style-type: none"> ▪ Affected Stakeholders | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings | When the project opportunities are available in a given location. | When needed | DGII |
| | | <ul style="list-style-type: none"> ▪ Other interested parties | <ul style="list-style-type: none"> ▪ DGII Website ▪ E-mail to external stakeholders ▪ Online meetings | When the project opportunities are available in a given location. | When needed | DGII |
| Operation | Community health and safety information meetings for local residents | <ul style="list-style-type: none"> ▪ Vulnerable/disadvantaged individuals/ groups ▪ Communities living in the project affected settlements ▪ Mukhtars of the settlements | <ul style="list-style-type: none"> ▪ Stakeholder visits ▪ Consultation meetings ▪ FGD ▪ Letter/post ▪ Posters/flyers | In case of Project activities that may negatively affect public health and safety If there will be a temporary traffic impact or restriction during work such as maintenance and repair 1 week before the days when there will be activities such as passage restrictions, road closures, traffic congestion, equipment shipment with heavy vehicles | When needed | DGII |

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5 STAKEHOLDER ENGAGEMENT PROGRAM AND METHODS

5.1 Disclosure of the Project Information

Stakeholder engagement is a continuous process that commences even before the development of this SEP and will persist throughout the Project's lifecycle. The project owner will maintain active communication with stakeholders throughout the duration of the project. Specifically, the project owner will actively consult stakeholders regarding the project's environmental and social risks and impacts and the implementation of planned mitigation measures.

In instances where there are significant changes to the project, resulting in additional risks and impacts, the project owner will share information about these risks and impacts. Furthermore, consultations with the affected parties will be conducted to explore ways to reduce and mitigate these newly identified risks and impacts.

5.2 Informative Actions

Consultation Meetings: Regular consultation meetings will be held with all stakeholders as needed and at the request of stakeholders affected by or interested in the Project. These meetings will provide detailed project information and allow stakeholders to ask questions and share their opinions. Stakeholders shall be kept informed with updated information at each stage of the Project, including current developments, and their feedback will be documented. Consultation meetings can be held during the project process when needed and when stakeholders demand. Meetings will be held in places and places that will facilitate the participation of stakeholders.

To inform local communities about the potential impacts of the project, information will be provided through the disclosure and consultation processes on the draft E&S documents. Stakeholder opinions and expectations will be addressed during these processes, as well as through regular and continuous engagement with stakeholders throughout project implementation. For the Project community health and safety announcements, posts, letters, posters will be available in other languages if necessary.

Focus Group Discussions (FGD) will be held to engage specific sections of the community that may require special attention in consultation, including females, especially who are the sole heads of household, elderly, people with handicapped, including home bound, bedridden individuals, and illiterates. These discussions are an effective way to gather people with similar experiences to discuss topics related to the Project.

Presentations: Visual materials will be used in public participation and consultation meetings held quarterly. Summarized presentations of written documents will be provided.

Project Brochure: Initial project introduction brochures will be distributed to stakeholders, offering general information about the Project and the ESIA process, along with details about the grievance mechanism and communication channels. Project brochures will be available in other languages if necessary.

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Grievance Mechanism: The grievance mechanism will be accessible to all stakeholders throughout the project's duration. It will include the registration of complaints, actions for resolution, and closure of complaints by providing necessary information.

Phone Line: A dedicated phone line will be available for all stakeholders to raise concerns and complaints. This method is valuable for its speed and the ability to address stakeholders' urgent problems.

Website: Website of the DGII (<https://aygm.uab.gov.tr/>) will host announcements, Project documents, reports, and contact details for those seeking more information.

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6 ROLES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

DGII is a public institution affiliated to the MoTI, with a special budget for finance. The roles and responsibilities of the DGII are among others to prepare and approve the plans and projects of railways, logistic villages, centers or bases, ports, shelters, coastal structures, airports to be built by the state and to construct and / or to have these transportation infrastructures handed over.

Filyos Port and Industrial Zone Railway Connection under Component 1 of Improving Railway Connectivity Project will be handed over to Republic of Turkey State Railways (TCDD) General Directorate after the completion of construction. TCDD General Directorate will include the Project in its environmental and social management system (ESMS) within the scope of railway management.

DGII PIU will integrate stakeholder engagement into ESMSs, assign and supervise a trained social team, ensure full compliance with legal and ethical standards, maintain comprehensive documentation and reporting, conduct continuous monitoring and evaluation, and ensure transparent communication channels are accessible to all stakeholders. The DGII PIU Social Specialist, OHS Specialist, Environment Specialist, and Stakeholder Engagement Specialist will carry out monitoring, reporting, training, consultation coordination, public disclosure, grievance follow-up, meaningful engagement with vulnerable groups, and communication with the World Bank.

DGII will regulate the contractual agreements with Contractor to ensure that they have a CLO and Stakeholder Engagement Specialist on site who will be responsible for recording and follow up of grievances on site office. Recording and follow up of all project-related grievances (including environmental issues) will be the primary responsibilities of the DGII PIU. DGII PIU will have personnel assigned/hired for the grievance management process both on site and in Headquarters. Stakeholder Engagement Specialist and Social Specialist of the PIU and CLO of the Contractor on site will be primarily responsible for grievance management as well as Contractors' social staff. Contractor responsibilities also include full compliance with SEP and GM requirements, obtaining permits, conducting stakeholder engagement under the ESMP and SEP, providing SEP/GM/OHS trainings, monitoring and auditing SEP and GM practices, periodic reporting to DGII, maintaining records, ensuring transparent communication channels, implementing meaningful engagement actions for vulnerable groups, and fulfilling all legal and contractual requirements related to stakeholder engagement. Contractor's Project Manager, Environment Lead, Social Lead, and CLOs will manage on-site grievance processes, reporting, monitoring, training, documentation, and engagement activities.

The core responsibility of the CLOs will involve collecting submissions from stakeholders directly in the field. The 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. Additionally, DGII will ensure that stakeholder engagement, information disclosure, and grievance-related activities are fully integrated into overall project management, including structured coordination with communities and vulnerable groups. The Supervision Consultant will support this process by maintaining accurate field-level grievance records, monitoring Contractor performance, and regularly reporting any issues or trends to DGII. Supervision Consultant Social Specialist and Environmental Specialist will ensure stakeholder engagement is conducted in line with SEP, oversee labor and worker grievances in line with LMP, ensure the GM is operationalized, monitored and reported, and collaborate with DGII PIU in E&S oversight.

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Contractor CLOs will also take responsibility for continuous on-site engagement, timely submission of GM records to DGII, and proactive communication with affected communities to strengthen transparency and accountability. The Supervision Consultant's Social Specialist will also be responsible for ensuring that grievance procedures are implemented in accordance with the SEP, monitoring accessibility of the GM for all stakeholder groups, and supervising labor-related grievances in line with the LMP. The Contractor will be responsible for all of its staff (including contractor and subcontractor staff) to have E&S responsibility awareness to ensure that E&S requirements are implemented smoothly on site.

Table 5, Table 6, and Table 7 below set out the identified roles and responsibilities for both the contractor and DGII in executing and managing the Project's stakeholder engagement plan. In addition, roles and responsibilities of the Supervision Consultant is presented in the Table 8.

Table 5. Roles and Responsibilities for Stakeholder Engagement Action Plan

| Responsible Party | Responsibility |
|-------------------------|--|
| DGII PIU | <p>DGII PIU is obliged to effectively implement and continuously monitor and be informed about all disclosure activities conducted under the SEP. This responsibility includes information sharing, dissemination, stakeholder consultation and reporting activities required for the scope and implementation of the SEP and GM.</p> <p>DGII PIU (based in Ankara) will monitor the implementation of the SEP and GM of the Project from Ankara and in the Project study area in Filyos / Çaycuma / Zonguldak. Therefore, DGII PIU will ensure that Project staff are present both at Ankara and in the site.</p> <p>DGII PIU will be legally committed to providing support to all staff members who may interact with stakeholders. This support will be particularly emphasized in cases where staff members identify issues or concerns raised by local communities or other stakeholder groups. Such support will ensure that all interactions are conducted in accordance with legal and ethical norms.</p> <p>Coordination with the World Bank:</p> <p>DGII PIU will assume the legal responsibility to coordinate interface and reporting activities to and from the World Bank regarding the implementation of the SEP. This will include compliance with any bilateral or multilateral agreements and fulfillment of all legal obligations arising from such interactions.</p> <p>DGII PIU is responsible for ensuring that the SEP is updated as required, reporting to the Bank on a semi-annual basis on the implementation of the SEP including the GM and providing training on the SEP & GM. Monitoring and auditing of SEP activities and the GM are also among the responsibilities of DGII PIU.</p> <p>Implementation of SEP on the RP and RP/Livelihood Restoration Plan (LRP) activities.</p> |
| Construction Contractor | <p>Fulfillment of all requirements of the SEP and GM Procedure under the leadership of the DGII. Implementation of additional commitments determined by DGII on SEP activities and GM</p> <p>Ensuring compliance with project standards, obtaining all relevant permits and licenses.</p> <p>According to construction activities (including subcontractor activities), carrying out the stakeholder engagement activities within the scope of the ESMP and SEP.</p> <p>Providing the necessary trainings to the contractor and sub-contractor staff on SEP, GM environmental and social (including occupational health and safety) issues.</p> <p>Monitoring and audits related to SEP and GM practices and periodic reporting to DGII.</p> |

Under the Responsible Parties defined in the table above, following tasks will be carried out by the defined personnel below.

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Table 6. Roles and Responsibilities of the Responsible Parties of the DGII

| Staff | Responsibility |
|-------------------------|--|
| DGII PIU (Ankara based) | <p>Project Manager</p> <p>Integration of Stakeholder Engagement into Management Systems:</p> <p>Ensures that stakeholder engagement activities are seamlessly integrated into ESMSs.</p> <p>Reports on the progress and results of stakeholder engagement to senior management, provides feedback to relevant SEP and GM personnel.</p> <p>Facilitating and Supervising the Social Team:</p> <p>Assigns a dedicated team responsible for stakeholder engagement and grievance mechanisms.</p> <p>Ensures that the social team is well trained and has the necessary skills and resources to carry out the procedures effectively.</p> <p>Supervises that the training defined for the social team is provided in accordance with legal requirements and the requirements set out in the Project's ESIA&ESMP&SEP document.</p> <p>Supervises the implementation of grievance mechanisms and stakeholder engagement procedures, monitors compliance and performance.</p> <p>Collaboration and Coordination:</p> <p>Ensures that the procedures related to grievance mechanisms and stakeholder engagement issues are implemented appropriately, collaborating closely with relevant internal and external parties, including government agencies, regulatory bodies, local authorities and affected communities.</p> <p>Documentation and Reporting:</p> <p>Ensures that meticulous records are kept of all stakeholder engagement activities, including complaints received and steps taken to address them.</p> <p>Reports regularly to senior management, staff members and external stakeholders on the status of stakeholder engagement activities and grievance resolution as required by legal and contractual obligations.</p> <p>Ensures that reporting includes information on progress, results and any necessary adjustments to procedures.</p> <p>Continuous Monitoring and Improvement:</p> <p>Monitors, receives regular reporting and assesses that a robust monitoring and evaluation framework is in place to assess the effectiveness of stakeholder engagement activities and grievance mechanisms.</p> <p>Strive to improve stakeholder engagement and grievance mechanism practices in line with Project commitments.</p> <p>Compliance with Legal and Ethical Standards:</p> <p>Ensures that all stakeholder engagement and grievance resolution procedures comply with relevant legal requirements, international standards and ethical guidelines.</p> <p>Conduct regular legal reviews to verify compliance and make necessary adjustments.</p> <p>Communication and Transparency:</p> <p>Ensures that a workflow is in place that promotes a culture</p> |

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| Staff | Responsibility |
|---|--|
| | <p>of transparency and open communication, both internally and externally.</p> <p>Ensures that stakeholders are provided with clear and accessible channels to voice their complaints and concerns and ensures that these channels are communicated.</p> |
| Environmental Specialist | <p>Verify that stakeholders are informed of and have access to the project's Grievance Mechanism (GM).</p> <p>Monitor and report on environmental-related grievances submitted through the GM.</p> <p>Oversee the Contractor's compliance with SEP and GM requirements during site activities.</p> |
| Social Specialist | <p>Comprehensive Understanding of Stakeholder Engagement Protocols:</p> <p>Informs contractors on protocols and procedures governing stakeholder engagement.</p> <p>This briefing covers legal obligations, procedural requirements and ethical standards for interactions with stakeholders, as required by the Project, as well as applicable laws and regulations.</p> <p>Ensures accurate and timely preparation of reports, records and other documentation to be prepared by the Social Specialist DGII in accordance with Project monitoring obligations.</p> <p>Management of Public Engagement Meetings and Disclosure Activities</p> <p>Coordinates stakeholder meetings, documents consultation results and communicates any necessary corrective actions or recommendations to the Project Manager.</p> <p>Maintains regular communication with stakeholders.</p> <p>Monitors grievance resolution and reports on progress.</p> <p>Ensures that legal obligations regarding information dissemination, stakeholder consultation and reporting are carefully observed.</p> <p>Monitors and implements with the Stakeholder Engagement Specialist and Social Lead of the Contractor the implementation of actions and measures that will ensure meaningful participation of stakeholders, particularly vulnerable groups, in the SEP and GM.</p> <p>Participates in necessary meetings to ensure consultations and coordination with the World Bank on Social Issues, and takes an active role in the social management of this process according to the WB ESS together with the Project Manager.</p> <p>Responds to all questions or requests for information during these meetings.</p> <p>Ensures coordination of social monitoring requirements, field visits, monitoring and auditing processes.</p> |
| Occupational Health and Safety (OHS) specialist | <p>Investigate accidents, incidents, and near-misses to determine root causes and implement preventive measures.</p> <p>Identify and implement opportunities for enhancing workplace safety and reducing risks throughout the project lifecycle.</p> |
| Public | Keeps the SEP document up-to-date, revises it as |

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| Staff | Responsibility |
|-------|--|
| | <p>relation/stakeholder engagement specialist</p> <p>necessary, and submits it to the Project Manager and Project management.</p> <p>Monitors the methods, materials, timing, and levels of participation specified in the SEP during implementation.</p> <p>Conducts interviews with DGII PIU and others involved in the stakeholder engagement process to assess progress and identify critical issues.</p> <p>Interacts with affected households and community leaders through short surveys to gather feedback on Project performance during staff engagement.</p> <p>Interacts with various stakeholders to obtain their perspectives on SEP implementation.</p> <p>Reviews grievance records to identify significant non-compliance or recurring issues related to stakeholder engagement and other Project activities. Develops appropriate actions to address these concerns.</p> <p>Conducts meetings with lenders' project security and audit teams and provides answers to their questions as necessary.</p> <p>Monitor and report on progress in meeting commitments specified in the SEP.</p> <p>Undertakes any additional activities required to achieve the objectives of the SEP implementation.</p> <p>Effective Communication with the Community:</p> <p>Provides timely and appropriate Project notifications in SEP to ensure effective communication with the community,</p> <p>Monitors public notifications, updates and stakeholder engagement program and implements all necessary activities on site,</p> <p>Carries out one-on-one communication and announcement meetings with women and vulnerable groups to ensure meaningful communication and engagement with all Project stakeholders.</p> <p>Conducts meetings with local people to record complaints when necessary for Proactive Handling of Complaints.</p> <p>Reports complaints to GM mechanism and follows up on actions.</p> |

Table 7. Roles and Responsibilities of the Responsible Parties of the Contractor

| Staff | Responsibility |
|------------|---|
| Contractor | <p>Project Manager</p> <p>Ensures smooth implementation of stakeholder engagement activities.</p> <p>Reports to DGII on the progress and results of stakeholder engagement, provides feedback to relevant SEP and GM staff.</p> <p>Assigns a dedicated team responsible for stakeholder engagement and grievance mechanisms.</p> <p>Ensures that the social team is well trained and has the necessary skills and resources to carry out the procedures effectively.</p> <p>Supervises the provision of training defined for the social</p> |

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| Staff | Responsibility | |
| | <p>team in accordance with legal requirements and the requirements set out in the Project's ESIA&ESMP&SEP.</p> <p>Supervises the implementation of grievance mechanisms and stakeholder engagement procedures, monitors compliance and performance.</p> <p>Ensures that grievance mechanisms and procedures related to stakeholder engagement issues are implemented appropriately.</p> <p>Ensures that meticulous records are kept of all stakeholder engagement activities, including complaints received and steps taken to address them.</p> <p>Regularly reports to DGII and external stakeholders on the status of stakeholder engagement activities and grievance resolution as required by legal and contractual obligations.</p> <p>Ensures that reporting includes information on progress, results and any necessary adjustments to procedures.</p> <p>Monitors, receives regular reporting and assesses that a robust monitoring and evaluation framework is in place to assess the effectiveness of stakeholder engagement activities and grievance mechanisms.</p> <p>Strives to improve stakeholder engagement and grievance mechanism practices in line with project commitments.</p> <p>Ensures that all stakeholder engagement and grievance resolution procedures comply with relevant legal requirements, international standards and ethical guidelines.</p> <p>Ensures that a workflow that promotes a culture of transparency and open communication, both internally and externally, is in place. Ensures that clear and accessible channels are provided for stakeholders to raise their complaints and concerns and that these channels are communicated.</p> | |
| | <p>Ensures that environmental accidents are investigated and analyzed and reports to DGII E&S team.</p> <p>Ensure that any incident or accident that has or may have significant adverse environmental impacts related to the project is immediately reported to DGII.</p> | Environmental Lead |

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| Staff | Responsibility |
|-------------|--|
| Social Lead | <p>Informs contractors on protocols and procedures governing stakeholder engagement, provides necessary training.</p> <p>Social Lead Ensures accurate and timely preparation of reports, records and other documentation to be prepared in accordance with Project monitoring obligations and submits them to DGII.</p> <p>Coordinates stakeholder meetings, documents consultation results and communicates necessary corrective actions or recommendations to Contractor Project Manager and DGII.</p> <p>Maintains regular communication with stakeholders on site.</p> <p>Monitors grievance resolution and reports on progress.</p> <p>Ensures implementation of legal obligations related to information dissemination, stakeholder consultation and reporting.</p> <p>Implements and monitors actions and measures to ensure meaningful participation of stakeholders, especially vulnerable groups, in SEP and GM.</p> <p>Participates in necessary meetings to ensure consultation and coordination with DGII on Social Issues.</p> <p>Responds to all questions or requests for information during these meetings.</p> <p>Implements processes for social monitoring requirements, site visits, monitoring and auditing.</p> |

Table 8. SEP related Roles and Responsibilities of the Responsible Parties of the Supervision Consultant

| Staff | Responsibility |
|------------------------|---|
| Supervision Consultant | <p>Maintain accurate field-level grievance records, monitor Contractor performance, and regularly report issues or emerging trends to DGII.</p> <p>Ensure that stakeholder engagement activities are conducted in line with the SEP and that stakeholders are informed of and have access to the project's grievance mechanism (GM).</p> <p>Oversee labor-related issues, including worker grievances, in accordance with the Labor Management Procedures (LMP) and SEP.</p> <p>Ensure effective implementation, monitoring, and reporting of the project's grievance mechanism (GM).</p> <p>Provide environmental and social oversight, with the Social Specialist and Environmental Specialist collaborating closely with the DGII PIU.</p> |
| | <p>To work closely and in collaboration with the social specialist and the rest of the team to ensure all stakeholder engagements are conducted in line with the SEP and ensure the GM is operationalized, maintained, monitored and reported in line with the SEP.</p> |

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7 MONITORING AND REPORTING

Regular environmental and social monitoring and related reporting will be carried out by DGII in order to assess the implementation and effectiveness of the SEP- and GM-related roles and responsibilities of the Contractor, as described in this SEP. In line with the general framework of audits and monitoring, the following issues will be controlled:

- The quality and effectiveness of the implementation of SEP and GM by all personnel,
- Conducting SEP and GM in accordance with the World Bank ESF and relevant World Bank guidelines,
- Identifying possible non-compliance and outlining corrective measures to ensure correction;
- Verifying that Project activities are being carried out to meet SEP commitments and GM's Project objectives.
- Key Performance Indicators (KPIs) will be reported quarterly to the DGII PIU by the Contractor. DGII PIU will submit the monitoring report quarterly including the KPIs of the SEP and GM.

In order to monitor the timeliness of the plan, the effectiveness of communication tools and the functionality of the complaint mechanism, DGII will prepare quarterly monitoring reports and submit them to WB.

According to the monitoring results, necessary improvements will be made to ensure the effectiveness of communication tools and the functionality of the complaint mechanism. During these monitoring, both the number and quality of complaints and information requests will be evaluated, the revisions made will be reflected in the document and stakeholders will be informed.

The SEP will be updated periodically and upon major project changes. Updates will provide brief summaries of issues, concerns and questions raised during the previous year, as well as information on any changes between planned activities and the activities and events actually held.

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8 GRIEVANCE MECHANISM

8.1 Purpose and Scope

The main aim of the grievance mechanism is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project-affected stakeholders, and
- Provide channels for the stakeholders to provide feedback and raise concerns.

8.2 CİMER

Presidency's Communication Center (CİMER) is the line established for all kinds of problems, complaints and requests of citizens. The system has been actively used by citizens since its establishment. CİMER is used by a software program and a webpage developed by the Presidency's Directorate of Communications. By keeping the communication channels between citizens and government open, CİMER ensures that applications can be made anytime and anywhere.

Grievances can be conveyed by the following communication channels.

| | |
|----------------------------------|--|
| Webpage: | www.cimer.gov.tr/ www.turkiye.gov.tr/ |
| Call Centre (hotline): | 150 |
| Phone number: | +90 312 590 20 00 |
| Fax number: | +90 0312 473 64 94 |
| Official Letter/Petition: | Republic of Türkiye, Directorate of Communications T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe / Ankara |
| Individual Application: | Community relations desks at governorates, ministries and district governorates. |

Complaints submitted to CİMER are forwarded to DGII through official channels and their solutions are followed by DGII PIU.

DGII responds to the applicants within 15 days by evaluating the application content in accordance with the law. However, access to the information or document is provided within 30 working days in cases where information or documentation is required from another department within DGII, the opinion of another institution or organisation about the application is required, or the application content is related to more than one institution. In this case, the extension of the response period and the reason for this are reported to the applicant within 15 working days.

In addition to its general use, the CİMER system will also be employed at the Project level to receive and address complaints from individuals affected by the Project or from other concerned parties. As per the Right to Information Act, every individual has the right to access information, following the procedures and principles outlined in written regulations.

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This can be done by submitting a written request through the Right to Petition or online at <https://www.icisleri.gov.tr/bilgi-edinme>.

8.3 Foreigners Communication Center (YİMER)

The Foreigners Communication Center (YİMER) provides a centralized complaint system for foreigners. YİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. Contact details of YİMER are given below.

| | |
|----------------------------------|--|
| Webpage: | www.yimer.gov.tr |
| Email: | yimer@goc.gov.tr |
| Call Centre (hotline): | 157 |
| Phone number: | +90 312 515 11 22 |
| Fax number: | +90 312 920 06 09 |
| Official Letter/Petition: | Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle / Ankara |
| Individual Application: | Republic of Türkiye General Directorate of Migration Management |

8.4 World Bank Grievance Redress Service

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS).

The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

Project affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

8.5 Project Level GM Procedure Responsibilities

The designated personnel in the DGII and Contractor will be responsible for adhering to the Project GM that has been put in place to document and address all complaints raised by stakeholders.

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DGII will also oversee the monitoring of corrective actions taken to resolve these complaints. DGII PIU is obliged to effectively implement, continuously monitor, and be informed about all disclosure activities under the SEP, including information sharing, dissemination, stakeholder consultation, reporting, monitoring, and auditing responsibilities. DGII PIU (based in Ankara and the Project site) will ensure legal compliance, provide support to all staff interacting with stakeholders, coordinate reporting to the World Bank, and update the SEP and GM as required.

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:

- **Telephone:** (0312) 203 10 00 (telephone central for AYGM, the complainant should 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
- **Contact persons:** İbrahim Görkem Gökmen, Hazal Babur
- **Face to face** – stakeholders can submit their requests (suggestion, grievance, etc.) to assigned personnel of DGII at Project office
- **Application form** (see Appendix-1)- stakeholders can fill out a form available on multiple platforms, including the DGII webpage, during consultations and stakeholder engagement meetings, next to grievance boxes placed at the construction site, or at other project-related locations.
- **Complaint boxes on site** especially in Gökçeler village.
- **Complaint register form (CRF)** (see Appendix-1) (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances)
- **DGII's ALO 123 Call Center** which also enables stakeholders to submit their requests both verbally and written. The stakeholders can access the Request Form to submit their applications in the following link: <https://www.uab.gov.tr/cagri-merkezi>.

The primary avenue for submitting any form of feedback or complaint will be through the Project-specific Grievance Mechanism (GM). The GM process will be overseen by the DGII PIU through its Stakeholder Engagement Specialist and Social Specialist (including stakeholder engagement and occupational health and safety specialists) respective specialist of the Supervision Consultant and Contractor through its Community Liaison Officers (CLOs).

8.6 Receiving and Recording External Stakeholder's Complaints

The assigned staffs defined under the Roles and Responsibilities section, will follow procedures developed for the Grievance Mechanism established to record and resolve all complaints from the stakeholders and follow up corrective actions taken.

The initial registration process will be carried out by the social expert/ Stakeholder specialist of the PIU unit that receives the complaint form. In this regard, all communication channels are designed to ensure that the complaint form is forwarded to the relevant units.

When a complaint received via a national level GMs, complaint will be immediately forwarded to the stakeholder engagement and social specialist of the PIU and recorded in the project's GM record system, where all stakeholder complaints will be recorded. A copy of the application form (Appendix-1) should also be provided to the complainant.

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Complaint registration form includes following;

- Complainant's name and contact information (complainants also have the opportunity of anonymous grievance lodging),
- An option for anonymous registration if the complainant does not wish to share personal data,
- Location of the complaint,
- Date of the complaint,
- Subject of the complaint,
- Complainant's proposed solution,
- Name and contact information of the person receiving the complaint,
- If necessary, contact information of the unit and person to whom the complaint will be forwarded,
- Actions taken to address the complaint, and
- Closure date if the complaint is resolved.

DGII will also share the complaint closure form on their official Project website following the closure of the request received to ensure transparency in project implementation.

The potential list of grievance categories includes, but is not limited to, the following:

| | |
|------------------------------|--|
| 1. Access Issues | 10. Land Acquisition: Compensation |
| 2. Communication | 11. Livelihood Restoration |
| 3. Damage to Environment | 12. Local Authority Demands |
| 4. Dust, Noise and Vibration | 13. Route Selection Reinstatement |
| 5. Health and Safety | 14. Gender Based Violence and Harassment (GBVH) and Discrimination |
| 6. Road Safety | |
| 7. Damage to Private Assets | |
| 8. Employment | |
| 9. Impact on Livelihood | |

Gender Based Violence (GBV), Sexual Exploitation and Abuse / Sexual Harassment (SEA / SH) complaints will follow a separate procedure to ensure confidentiality of the aggrieved party. The complaint will be registered within two (2) business days from the moment it is received. Registering complaints is crucial for monitoring purposes. Even if complaints are verbal, they will be processed in compliance with the procedures followed for the application forms and flowchart provided below (see Figure 8-1).

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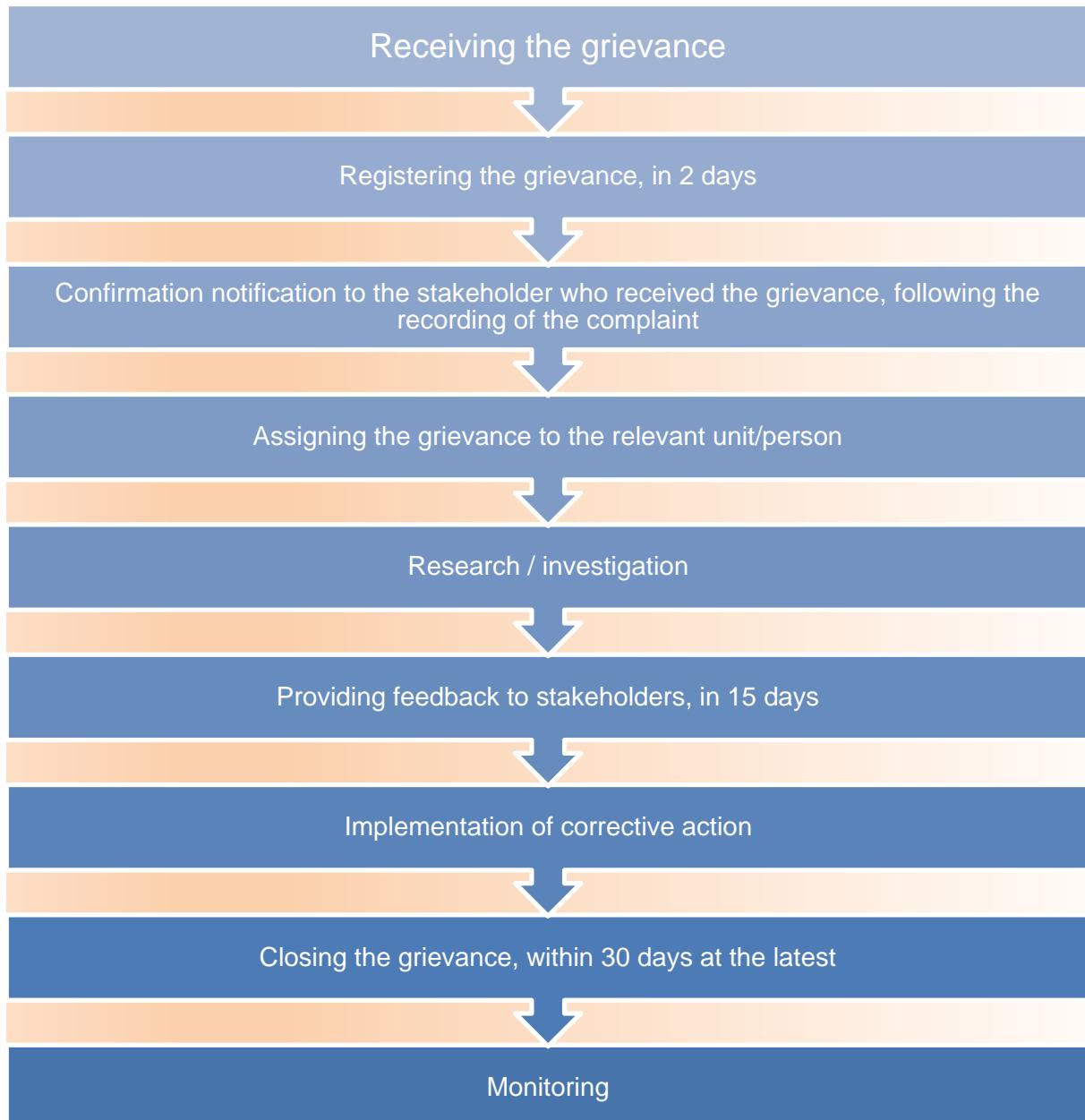


Figure 8-1: Grievance Mechanism Flowchart

If the subject of the complaint is related to a public institution or organization outside the facility, guidance will be provided to the complainant on how to transfer the complaint to the relevant institution. Similarly, in workplace accidents/incidents involving internal stakeholders, support will be provided to the stakeholder in coordination with the CLOs and PIU.

8.6.1 Handling Sexual Exploitation and Abuse/Sexual Harassment Issues

Managing grievances related to sexual exploitation and abuse (SEA), sexual harassment (SH), and other forms of gender-based violence (GBV)⁵ requires a different approach than

⁵ *Sexual exploitation:* Any real or attempted abuse of a position of vulnerability, power differential, or relationship of confidence for a sexual purpose, including, but not limited to, taking financial, social, or political advantage of another through sexual means.

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other types of concerns raised through project-level grievance mechanisms due to the topic's sensitive nature; the potential for survivors to experience stigma, rejection, or harm; and because of the reluctance of many survivors to come forward and report cases. The specific nature of SEA and SH necessitates tailored measures for the reporting and safe and ethical handling of such allegations through grievance mechanisms⁶.

SEA/SH grievances in projects are sensitive due to secondary victimization, repeated trauma, and the risk of retaliation against the survivor or other persons reporting such cases. Therefore, the Project-level grievance mechanism is structured to be sensitive to the needs of SEA/SH survivors.

While handling SEA and SH complaints, the GM will ensure; (i) referral to survivor-support services (health, psychological, legal aid, etc.), based on the consent, needs, and wishes of the survivor; (ii) linkage to the domestic legal system; and (iii) internal inquiry by the DGII, its contractors and sub-contractors to determine the likelihood that the allegation relates to the Project. When individuals or groups raise these kinds of sensitive issues, the responsible DGII PIU personnel will ensure that these grievances are filed safely and confidentially in the GM. DGII PIU will ensure that SEA/SH complaints are treated confidentially and that there will be no retaliation against individuals or groups who report such complaints.

The SEA/SH grievance mechanism will function in accordance with the laws⁷ of the Republic of Türkiye and will provide linkages to the legal system of the country. Cases will be referred to the country's regulatory framework for processing if the consent of the survivor is received. Submitting a SEA/SH complaint shall not prevent the survivor from also pursuing an action in the judicial system.

Guiding Principles for Handling SEA/SH Related Grievances

To avoid the possibility of harm, stigma, rejection, or re-traumatization of survivors, the SEA/SH grievance mechanism will apply three key guiding principles; survivor-centric approach, confidentiality, and survivor's safety. These guiding principles are explained below. Staff involved in handling SEA and SH cases will receive initial and continuous training on a survivor-centered approach, adherence to safety and confidentiality principles, and referrals to support services.

Survivor-centric approach: The survivor-centric approach sees the survivor as the main decision-maker for their own lives. The rights, wishes, and choices of the survivor should be at the center of the grievance procedures and decision-making process. According to this approach, the informed consent of the survivor needs to be obtained at all stages of the grievance procedure (from the recording of the allegation to the closure of the case). To ensure a respectful, culturally, and socially sensitive, and non-judgmental approach, GM

Sexual abuse: Real or threatened physical intrusion of a sexual nature, whether it be by force or under unequal or coercive conditions.
 Sexual harassment: Sexual advances, demand for sexual favors, or any other verbal or physical behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

6 Interim Technical Note, Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed projects, World Bank, April 2020.

7 The laws in force in Turkey related to SEA/SH issues are: (i) Constitution of the Republic of Turkey, (ii) The Civil Code (Law Number:4721, Publication Date: 22/11/2001), (iii) Labor Law (Law Number:4857, Publication Date: 22/5/2003), (iv) Turkish Criminal Law (Law Number:5237, Publication Date: 26/9/2004), (v) Turkish Code of Obligations (Law Number: 6098, Publication Date: 11/01/2011), (vi) Law of Protection of Family and Prevention of Violence Against Women (Law Number: 6284, Publication Date: 08/3/2012).

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officers handling cases will be trained on the impacts of SEA/SI on survivors, trauma, communication with survivors, service providers, their duties, and relevant legal regulations. Staff supporting SEA/SI-sensitive GM will be responsible for establishing a supportive environment where survivors' rights are protected, and they are treated with dignity and respect.

Confidentiality: Confidentiality is extremely important in handling SEA/SI-related grievances, as survivors of SEA/SI may avoid making a complaint out of fear of being blamed, shamed, or due to fear of retaliation. The grievance mechanism will put in place channels for registering, recording, and handling such cases in an ethical and confidential manner at all stages. Confidentiality procedures such as enabling complainants to report SEA/SI cases without being publicly identified, including anonymous complaints, protecting the information about a SEA/SI allegation -particularly the identity of the survivor or any other individuals reporting such cases- will be applied to the SEA/SI complaints and responsible persons will be trained about these procedures.

Survivor's safety: Survivors of SEA/SI may face retaliation by the perpetrator and/or family members of the perpetrator or be blamed for violence by their family members. Therefore, it is important to evaluate potential risks for the physical and psychological safety of the survivor and to make a safety plan accordingly with the survivor's consent. For this, with the consent of the survivor, the survivor may be referred to the GBV service providers (such as the police, gendarmerie, or ŞÖNİM⁸) as soon as possible for the assessment of potential risks and implementation of necessary measures. If the survivor is a project worker, necessary arrangements shall be made to ensure safety in the working environment or work program in line with the needs and demands of the survivor. These arrangements shall be provided without violating confidentiality and by taking measures/changes related to the perpetrator's work situation rather than the survivors.

DGII PIU the entire team and Contractor will be trained on how to deal with the handling, management and disclosure of SEA/SI related complaints. As with all other grievance matters, anonymous complaints will be accepted, both for workers' grievance and for external grievances.

In addition to all the described grievance mechanism tools, the project will directly monitor SEA/SI issues for employees/employees or external stakeholders and have confidential reporting with secure and ethical documentation and management of SEA/SI issues.

Additionally, the DGII will have the awareness and functioning to promptly take action (within 2 business days) to promptly report any SEA/SI complaint to both the DGII and the WB, with the consent of the survivor. Thus, the existing DG will be strengthened with procedures to address allegations of GBV/SEA/SI violations during both installation/supply and operational processes.

Complaints regarding exploitation and unfair treatment of workers, including sexual harassment and abuse in the workplace, will be prioritized and processed.

⁸ Şiddet Önleme ve İzleme Merkezleri (Violence Prevention and Monitoring Centre)

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In case of any violation of rights, the Stakeholder Engagement Specialist and Social Specialist will collect the details regarding the issue and submit them to the evaluation committee consisting of the Project Director, Deputy Project Director and Social Specialist, Stakeholder Engagement Specialist, OHS Specialist to conduct the initial assessment and take the necessary measures and assessments.

The relevant committee will evaluate and conduct the investigations regarding Gender-Based Violence/SEA/SH cases and the actions to be taken as a result of these investigations, based on all evidence and notification details. The appropriately designated authorities will be informed about the investigations regarding Gender-Based Violence/SEA/SH cases and the actions taken as a result of these investigations.

Unless the case requires mandatory reporting under national laws, for incidents of sexual exploitation/abuse, sexual harassment in the workplace, or potential cases of child abuse at the project site, the responsible staff will be tasked with receiving SEA/SH-related grievances, recording only the basic⁹ necessary information. This information will then be conveyed to the social specialist/SEA/SH focal point at the PIU for further management. The responsible staff will also inform the survivor about mandatory reporting obligations in Türkiye (if applicable), the operation of the GM, including its limitations, and the availability of GBV services.

8.7 Evaluation and Resolution Process

Once complaints received through all communication channels are registered, contact with the complainant must be established within two (2) business days. During this communication, the complainant is informed about the methods to be applied for resolving the complaint, and it should be conveyed that following the evaluation process, corrective actions will take place within fifteen (15) business days.

When the corrective action is defined and decided upon, if the complainant is an external stakeholder, this stakeholder is informed. If the complainant is a Project employee, the process is informed, and feedback is received through the worker representative or directly to the worker.

One important aspect here is the requirement, as per the Turkish Republic Constitution Article 20 and the Personal Data Protection Law (KVKK), to keep all recorded data confidential.

The complainant's proposed solution, if provided along with the complaint form, must be taken into account in the resolution and evaluation process.

If the resolution process is complex, the proposed solution may be extended up to twenty (20) days, and efforts are made to reach an agreement within a maximum of thirty (30) business days through negotiations. During this period, the proposed solution in line with

⁹ Information collected by the grievance mechanism will be kept to a minimum to protect the confidentiality of the survivor. Staff intaking SEA/SH complaints at all levels will only ask for the following information: (i) the age/sex of the survivor and the alleged perpetrator (if possible), (ii) the nature of the allegation-what a survivor says in his or her own words without direct questioning, and (iii) if the survivor states that the incident is related to the Project, the services are provided to the survivor and accepted by the survivor.

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respect for personal rights and satisfying the complainant should be produced. After mutual agreement on the proposed solution is reached with the complainant, corrective actions should be initiated within thirty (30) days.

If no agreement can be reached on the proposed solution, it should be communicated to the Appeals Committee.

8.8 Appeals Committee

The Appeals Committee, established by DGII, will act as an independent intermediary mechanism to address unresolved grievances reported by PAPs and stakeholders before disputes escalate to legal channels. To ensure inclusiveness and transparency, the committee will consist of key representatives from various stakeholders. Members will include the Contractor Social Lead, who will represent the contractor's approach to social concerns, and the PIU Social Specialist, ensuring adherence to project-specific social safeguards and the PIU Stakeholder Engagement Specialist, to ensure stakeholder concerns are adequately addressed.

The committee will also include the Contractor Worker Representative to provide workers' perspectives, alongside the Contractor's Project Manager, HR Manager, Administrative Affairs Manager, OHS Lead, and, if available, the Contractor's Legal Representative, to address various dimensions of grievances effectively. Additionally, the Supervision Consultant's Social Specialist will provide impartial oversight, while a Stakeholder Representative will ensure that the interests of PAPs and other stakeholders are well-represented. Depending on the nature of the complaint, the relevant stakeholder representative can be included, such as settlement mukhtars.

The Appeals Committee will convene as needed to mediate grievances, propose mutually acceptable solutions, and inform complainants of their rights and subsequent legal procedures, maintaining a fair, transparent, and inclusive process.

8.9 Closure of the Complaint and Evaluation Process

Once an agreed-upon proposed solution is initiated, the results are recorded in the system. A copy of all documents related to the complaint and the actions taken during the resolution process is provided to the complainant, and a complaint closure agreement is reached. A copy of the signed agreement is also provided to the stakeholder. Proof documents of the corrective actions taken (photos from Site in subject or other evidence documents) are collected and a "grievance closure protocol" is signed by DGII PIU and the complainant.

8.10 Workers Grievance Mechanism

DGII PIU/Contractors will be establishing procedures and responsibilities for handling and overseeing workers' grievances, including those from subcontractors. They are committed to achieving the following objectives:

- Creating a mechanism for all employees, including subcontractor personnel, to voice their concerns and complaints about working conditions.
- Preventing the recurrence of grievances related to the same issues.

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- Providing open and transparent relationship with workers to address concerns at an early stage of any conflicts.

DGII PIU/Contractor will implement Workers Grievance Mechanism in accordance with the WB ESF, this SEP and project's LMP to give workers the opportunity to raise their concerns and grievances. Workers will receive information during on-the-job training on how to submit complaints, and complaint forms will be available at various locations in the construction camp, such as social areas and the food court. A Grievance table will be established to document all employee grievances, corrective actions taken, and outcomes. This table will be used to record, monitor, report, and evaluate all complaints, including those from third parties, employees, and contract workers, along with their respective responses.

DGII PIU/Contractor's CLO will receive complaints from workers and subcontractor employees, collaborating with relevant departments, workers' representatives to resolve them. The CLO will work alongside the Social Specialist and Stakeholder Engagement Specialist/CLO to document these grievances in the Grievance registration table. Additionally, a grievance box will be provided to workers where they can submit their request, concerns, and complaint forms in areas used by workers, such as social areas and the food court in the construction camp. The Social Specialist/CLO will record the date, time, source, location, and nature of each request in the complaint forms when received from CLO officers.

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Appendix-1 Registration Form

| FİLYOS PORT/INDUSTRIAL ZONE CONNECTIONS PROJECT ŞİKAYET KAYIT FORMU / COMPLAINT REGISTER FORM | | |
|---|--|---|
| Şikayetin Alındığı Yer / Location of Complaints Received | | Tarih / Date |
| Alan Yetkilisinin Adı / Name of Person In charge | | Şikayet Kayıt No / Complaint Register Number |
| Şikayette Konu Alanın Koordinatları / Coordinates of the area subject to complaint | | |
| Arazi parsel numarası (Şikayette arazi konulu ise) / Land Parcel Number (If complaint is related to land) | | |
| ŞİKAYET SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO Şikayet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geri dönüş şeklini bu formda belirtmesi gerekmektedir./ The Complainant may submit application anonymously, however in this form the Complainant should indicate the feedback mechanism to respond. | | |
| Ad Soy ad / Name Surname | | Şikayetin Geliş Yolu / Form of Complaint: |
| TC Kimlik No/ Identification Number | | <input checked="" type="checkbox"/> Telefon- Ücretsiz hat / Phone -Free phone line |
| Telefon / E-posta Telephone / E-mail | | <input checked="" type="checkbox"/> Halk Toplantısı / Community meeting |
| Köy- İlçe- İl / Village - District - Province | | <input checked="" type="checkbox"/> Dilekçe / Petition |
| ŞİKAYET DETAYLARI / DETAILS OF COMPLAINT | | |
| Şikayet Konusu / Complaint | | |
| Şikayet sahibi tarafından talep edilen çözüm / Solution requested by the Complainant | | |
| Şikayeti Alan Yetkilinin Ad Soyad ve İmzası / İmzası / Name Surname and Signature of the Registerer Complainant | Şikayet Sahibinin Ad Soyad ve Name Surname and Signature of | |

| | | |
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Appendix-2 Closeout Form

| FİLYOS PORT/INDUSTRIAL ZONE CONNECTIONS PROJECT ŞİKÂYET KAPATMA FORMU / GRIEVANCE CLOSE OUT FORM | | |
|--|--|---|
| Şikâyetin Alındığı Yer / Location of Complaints Received | | Tarih / Date |
| Alan Yetkilisinin Adı / Name of Person In charge | | Şikâyet Kayıt No / Complaint Register Number |
| Kapatma Numarası / Grievance Closeout Number | | |
| Derhal yapılacak eylemi tanımla / Define immediate action | | |
| Gerekli olması halinde, uzun vadede alınacak önlemleri/eylemleri belirle /Define long term action required (if necessary) | | |
| Ödeme gerekli mi? / Compensation required? | | |
| Alınan düzeltici önlemlerin ve verilen kararların denetimi/izlenmesi / Control of the remediate action and decision | | |
| | Düzeltici Eylem Aşamaları / Stages of Remediate actions | Süre ve Sorumlu Kurumlar / Deadline and Responsible Institutions |
| 1 | | |
| 2 | | |
| 3 | | |
| Compensation and Final Stages Bu bölüm, şikayet sahibi tazminat ücretlerini aldıktan ve/veya şikayetçi giderildikten sonra doldurulacak ve imzalanacaktır. This section will be completed and signed by the complainant after they have received the compensation and/or their complaint has been remediated. | | |
| Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası / İmzası / Name Surname and Signature of the Registerer Complainant | Şikâyet Sahibinin Ad Soyad ve Name Surname and Signature of the Complainant | |

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Appendix-3: Grievance Log

| ID Number of Stakeholder | Stakeholder Information | | | | Information about Grievance/Complaint/Concern/Question/Feedback | | | | | Staff Information | | | |
|--------------------------|-------------------------|------|----------|---|---|--------------------------------|----------------------|---------------------|------------------------------|-------------------|---------------------|-----------|----------|
| | Register Number | Date | Location | Vulnerability (Yes/No) <i>Please specify</i> | Status of Statement | Current Condition of Statement | Summary of Statement | Actions to be taken | Final Condition of Statement | Registration | Assigned team/Staff | Documents | Comments |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
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Appendix-4: World Bank Standards and Key Gaps with the National Framework

| National Framework | WB ESS | Key Gaps Between WBG ESSs and Turkish Legislation | Measures to fill the gaps |
|---|---|--|---|
| Environmental Impact Assessment (EIA) Regulation The Environmental Impact Assessment (EIA) Regulation, published in the Official Gazette No. 31907 on 29 July 2022, requires stakeholder engagement in the process of assessing the environmental impacts of projects. Accordingly, for projects listed in Annex 1, the preparation of a Stakeholder Engagement Plan is mandatory, and it must be submitted as part of the EIA application dossier. | ESS1 requires continuous assessment of social risks and impacts throughout the project lifecycle and application of the mitigation hierarchy (avoid, minimize, mitigate, compensate). | <i>Lack of independent and systematic assessment of social impacts.</i> Turkish legislation mainly focuses on environmental impacts); there is no explicit provision for systematic assessment of social risks. | Risks and impacts identified in the ESIA and addressed through the ESMP and RP are shared through the SEP. The SEP is a tool for consultations throughout the project |
| Freedom of Thought and Opinion ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal their thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of their thoughts and opinions. | ESS10 requires timely, accessible, and understandable disclosure of information to stakeholders. | <i>Due to EIA exemption, no mandatory stakeholder meeting; no continuous engagement mechanism defined in legislation.</i> The Constitution guarantees the right to petition and access to information; the EIA Regulation foresees Public Participation Meetings. However, for EIA-exempt projects, public consultation is not mandatory. | Information disclosure will be carried out earlier, more frequently, and in multiple accessible formats (face-to-face, brochures, website, etc.) and will be shared throughout duration of the Project in line with WB standards. |
| Freedom of Expression and Dissemination of Thought ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities. | ESS10 requires an accessible, transparent, inclusive, and continuous project-level GM. | <i>Timelines are not fully aligned with WB's requirement for timely and continuous disclosure; accessibility and formats may be limited.</i> The Right to Information Law (No. 4982) grants access to information, requiring institutions to respond within 15–30 working days. | A WB-compliant project-level GM will be established, with all submissions recorded and timely responses ensured. All stakeholder and PAP data will be managed in compliance with KVKK, supplemented by WB-compliant consent forms and information disclosure notices. |
| Right of Petition | ESS1 & ESS10 require that confidentiality of stakeholder data is safeguarded and explicit consent is obtained for data use. | <i>National mechanisms are general in nature; there is no project-specific, rapid, inclusive grievance mechanism.</i> The Constitution, the Right to Petition, and the | |

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| National Framework | WB ESS | Key Gaps Between WBG ESSs and Turkish Legislation | Measures to fill the gaps |
| <p>ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and the Turkish Grand National Assembly about the requests and complaints concerning themselves or the public.</p> <p>Law on the Right to Information</p> <p>Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organizations, which qualify as public institutions.</p> <p>Law on the Use of Right to Petition</p> <p>Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities about the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.</p> | | <p>Right to Information, provide general grievance mechanisms.</p> <p><i>General framework exists; however, WB's project-specific expectations for data protection are not explicitly addressed.</i></p> <p>KVKK (Law No. 6698) regulates processing, storage, transfer, and security of personal data.</p> | |

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Appendix-5: List of Stakeholder

Project Affected Household (PAH)- Owners / Shareholders & Actual users

| Province | District | Settlement | Owners / Shareholders | Actual users |
|-----------|----------|------------|---|--------------|
| Zonguldak | Çaycuma | Gökçeler | 102 owners / shareholders and their heirs | 14 |

PAP-Users of Public Structures

| Province | District | Settlement | Population |
|-----------|-----------------------|------------|------------|
| Zonguldak | Çaycuma | Gökçeler | 179 |
| Zonguldak | Çaycuma | Sazköy | 268 |
| Zonguldak | Çaycuma / Filyos town | Sefercik | 169 |
| Zonguldak | Çaycuma | Derekören | 271 |

PAP-Local residents

| Province | District | Settlement ¹⁰ | Type of settlement | Population |
|-----------|-----------------------|--------------------------|--------------------|------------|
| Zonguldak | Çaycuma | Gökçeler | Village | 179 |
| Zonguldak | Çaycuma | Sazköy | Village | 268 |
| Zonguldak | Çaycuma / Filyos town | Sefercik | Neighborhood | 169 |
| Zonguldak | Çaycuma | Derekören | Village | 271 |

PAP-Local representatives

| Province | District | Settlement | Local representative |
|-----------|-----------------------|---------------|--------------------------|
| Zonguldak | Çaycuma | Gökçeler | Mukhtar of Gökçeler |
| Zonguldak | Çaycuma | Sazköy | Mukhtar of Sazköy |
| Zonguldak | Çaycuma / Filyos town | Sefercik | Mukhtar of Sefercik |
| Zonguldak | Çaycuma | Derekören | Mukhtar of Derekören |
| Zonguldak | Çaycuma | Aşağıihsaniye | Mukhtar of Aşağıihsaniye |
| Zonguldak | Çaycuma / Filyos town | Öteyüz | Mukhtar of Öteyüz |

DVIGs among PAP

| Settlement | Gökçeler | | Sazköy | | Sefercik | | Derekören | |
|------------|----------|------------------|---------------|------------------|---------------|------------------|---------------|------------------|
| | DVIG | Number of Person | Number of PAP | Number of Person | Number of PAP | Number of Person | Number of PAP | Number of Person |

¹⁰ The settlements are listed in descending order based on the number of affected parcels in each settlement.

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| Settlement | Gökçeler | | Sazköy | | Sefercik | | Derecikören | |
| DVIG | Number of Person | Number of PAP | Number of Person | Number of PAP | Number of Person | Number of PAP | Number of Person | Number of PAP |
| Female household head | 8 | 8 | 5 | 5 | 1 | 1 | 1 | 1 |
| Disabled individuals | 3 | 3 | 3 | 3 | 3 | 3 | 6 | 6 |
| Elderly people | 27 | 18 | 32 | 21 | 15 | 9 | 21 | 15 |
| Elderly individuals who are in need of care, bedridden, and homebound | 9 | 7 | 4 | 3 | 0 | 0 | 4 | 4 |
| Illiterates | 1 | 1 | 3 | 3 | 0 | 0 | 4 | 4 |

| Region | Stakeholder Group | Other Interested Parties (OIP) |
|-----------|-------------------------------|--|
| | | Name of Stakeholder |
| ZONGULDAK | Local Government Institutions | • Governorship of Zonguldak |
| | | • Zonguldak Municipality |
| | | • Zonguldak Çaycuma Organized Industrial Zone |
| | | • Zonguldak Provincial Directorate of Culture and Tourism |
| | | • Zonguldak Provincial Directorate of Environment, Urbanization, and Climate Change |
| | | • Zonguldak Regional Directorate of Forestry |
| | | • Zonguldak Provincial Directorate of Commerce |
| | | • Zonguldak Chamber of Commerce and Industry |
| | | • Turkish Employment Agency (İŞKUR) Zonguldak Provincial Directorate |
| | | • Zonguldak Provincial Directorate of Family and Social Services - Violence Prevention and Monitoring Center (ŞÖNİM) |
| | | • Zonguldak 232nd Branch Directorate of DSİ |
| | | • Çaycuma District Governorship |
| | | • Çaycuma District Governorship - District National Real Estate Service Chief Office |
| | | • Çaycuma Municipality |
| | | • Çaycuma District Special Administration |
| | | • Çaycuma Municipality - National Real Estate Directorate |
| | | • Çaycuma Rural Service Delivery Union |
| | | • Çaycuma District Police Department |
| | | • Çaycuma District Gendarmerie Command |
| | | • Çaycuma Social Solidarity and Aid Foundation |
| | | • Çaycuma Social Service Center Directorate |
| | | • Filyos Municipality |
| | Education | • Zonguldak Provincial Directorate of National Education |
| | | • Zonguldak Bülent Ecevit University |
| | | • Zonguldak Bülent Ecevit University Çaycuma Vocational Technical School |
| | | • Çaycuma District Directorate of National Education |

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| Region | Stakeholder Group | Other Interested Parties (OIP) |
|--------|---------------------------------|--|
| | | Name of Stakeholder |
| | | <ul style="list-style-type: none"> • Zonguldak Çaycuma Public Education Center • Zonguldak Çaycuma Vocational Education Center • Zonguldak Çaycuma Teachers' House and Evening Art School • Zonguldak Çaycuma Special Education Vocational School • Zonguldak Çaycuma Science and Art Center • Zonguldak Çaycuma Filyos 100. Yıl Kindergarten • Zonguldak Çaycuma Saltukova Çocuklar Gülsün Diye Kindergarten • Zonguldak Çaycuma Filyos Hisarönü Zübeyde Hanım Primary School • Zonguldak Çaycuma Saltukova Primary School • Zonguldak Çaycuma Filyos Hisarönü Seçil Şanlı Secondary School |
| | | <ul style="list-style-type: none"> • Zonguldak Çaycuma Saltukova Gazi Secondary School • Zonguldak Çaycuma Saltukova Multi-Program Anatolian High School • Zonguldak Çaycuma Filyos Melek ve Ahmet Şanlı Anatolian High School |
| | | <ul style="list-style-type: none"> • Zonguldak Atatürk State Hospital • Zonguldak Bülent Ecevit University Hospital • Zonguldak Provincial Health Directorate • Zonguldak Çaycuma No 2 Family Health Center • Zonguldak Çaycuma District Health Group Presidency • Zonguldak Çaycuma State Hospital • Zonguldak Çaycuma Saltukova Health Center • Zonguldak Çaycuma Saltukova Family Health Center • Zonguldak Çaycuma Filyos Health Center • Zonguldak Çaycuma Filyos Family Health Center |
| | | <ul style="list-style-type: none"> • Zonguldak Provincial Directorate of Agriculture and Forestry • Zonguldak Çaycuma District Directorate of Agriculture and Forestry |
| | | <ul style="list-style-type: none"> • Zonguldak Çaycuma Forest Management Directorate |
| | Chamber and Unions | <ul style="list-style-type: none"> • Çaycuma Agricultural Credit Cooperative No. 2958 |
| | | <ul style="list-style-type: none"> • Zonguldak Chamber of Commerce and Industry |
| | Transportation | <ul style="list-style-type: none"> • Directorate General of TCDD, Station Directorate |
| | | <ul style="list-style-type: none"> • Zonguldak 15th Regional Directorate of State Highways |
| | Energy | <ul style="list-style-type: none"> • Başkent Electric – Zonguldak Provincial Directorate |
| | Investment and Industrial Areas | <ul style="list-style-type: none"> • Filyos Free Zone • Filyos Industrial Zone • Filyos Turkish Petroleum Port • Turkish Petroleum Corporation (TPAO) Individual Investment Zone • Turkish Petroleum Offshore Technology Center (TP-OTC) • TP-OTC Shorebase Logistics Center Management |
| | | <ul style="list-style-type: none"> • Çaytaş Ateş Tuğla Sanayi ve Ticaret A.Ş. |
| | | <ul style="list-style-type: none"> • Türkiye Petrolleri Gökçeler Tamer Öz Petrol / Özel Özgönenç |
| | | |
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| Region | Stakeholder Group | Other Interested Parties (OIP) |
|--------|--|--|
| | | Name of Stakeholder |
| | Petrol | |
| | • Zonguldak Gökçeler Kaya Mobilya (Furniture) | |
| | • Zonguldak Gökçeler Tios Oto Kaporta Boya (Auto Body Repair and Paint) | |
| | • Kilimli-Filyos-Saltukova Dual Carriageway Project-Bahadir Group / Intekar Project Site | |
| | Development Agency | • Western Black Sea Development Agency (BAKKA) |
| | NGOs / CSOs / Cooperatives and Unions | <ul style="list-style-type: none"> • Zonguldak Village Development and Other Agricultural Cooperatives Union / Central Union of Turkish Village Development and Other Agricultural Cooperatives • Association for Supporting Contemporary Life (ÇYDD) • Çaycuma Mukhtars Association • Filyos Culture and Solidarity Association • Türkiye Beyazay Association Zonguldak Branch • Türkiye Disabled Association Zonguldak Branch • Türkiye Philanthropic Association Çaycuma Branch • Union of Black Sea Region Non-Governmental Organizations (KASTOB) • Western Black Sea Culture and Solidarity Association • Zonguldak Associations Federation (ZONDEF) • Zonguldak Environmental Protection Association |
| | Media | <ul style="list-style-type: none"> • Değişim / Karadeniz Ereğli-Zonguldak • Demokrat / Karadeniz Ereğli-Zonguldak • Demokrat Çaycuma / Çaycuma-Zonguldak • Devrek Postası / Devrek-Zonguldak • Gündem / Karadeniz Ereğli-Zonguldak • Halkın Sesi / Online News Website • İmza / Kozlu-Zonguldak • Karadeniz Son Havadis / Online News Website • Medya 67 / Alaplı-Zonguldak • Önder / Karadeniz Ereğli-Zonguldak • Şafak / Online News Website • Yeni Adım / Central district -Zonguldak • Yeni Haber / Karadeniz Ereğli-Zonguldak |

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Appendix-6: Interviewed Stakeholders

| # | Project Phase | Identification | Relation | Stakeholder | Date of Interview (dd.mm.yyyy) | Type of Interview |
|-----|-----------------------|---|-----------------|---|--------------------------------|------------------------------------|
| 1. | Phase 2 / First part | OIP Local government bodies | - | 23 rd Provincial Directorate of General Directorate of State Hydraulic Works | 22.09.2022 | Field Visit Face to Face Interview |
| 2. | Phase 2 / First part | OIP Local government bodies | - | Zonguldak Special Provincial Directorate | 22.09.2022 | Field Visit Face to Face Interview |
| 3. | Phase 2 / First part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Industry and Technology | 22.09.2022 | Field Visit Face to Face Interview |
| 4. | Phase 2 / First part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Environment, Urbanization and Climate Change | 22.09.2022 | Field Visit Face to Face Interview |
| 5. | Phase 2 / First part | OIP Local government bodies | - | Western Black Sea Development Agency | 22.09.2022 | Field Visit Face to Face Interview |
| 6. | Phase 2 / First part | OIP Local government bodies | - | Petroleum Pipeline Corporation Work Site | 23.09.2022 | Field Visit Face to Face Interview |
| 7. | Phase 2 / First part | PAPs Local representative and local residents | Indirect Direct | Site visits to the nearest settlements along project route (Sazköy Aşağı İhsaniye, Derecikören) | 23.09.2022 | Field Visit Face to Face Interview |
| 8. | Phase 2 / First part | OIP Local government bodies | - | Karabük Cultural Heritage Conservation Regional Board | 23.09.2022 | Field Visit Face to Face Interview |
| 9. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Chamber of Commerce and Industry, and Western Blacksea Development Agency (BAKKA) | 24.08.2023 | Field Visit Face to Face Interview |
| 10. | Phase 2 / Second part | PAP Local representative | Indirect | Mukhtars of Filyos Öteyüz, Filyos Sefercik, Çaycuma Aşağııhsaniye, Çaycuma Derecikören, Çaycuma Gökçeler and Çaycuma Sazköy | 24.08.2023 | Field Visit Focus group |
| 11. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Agriculture and Forestry | 24.08.2023 | Field Visit Face to Face Interview |
| 12. | Phase 2 / Second part | OIP Local government bodies | - | Çaycuma District Municipality | 24.08.2023 | Field Visit Face to Face Interview |
| 13. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Environment, Urbanization and Climate Change | 24.08.2023 | Field Visit Face to Face Interview |

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| # | Project Phase | Identification | Relation | Stakeholder | Date of Interview (dd.mm.yyyy) | Type of Interview |
|-----|-----------------------|-----------------------------|----------|---|--------------------------------|------------------------------------|
| 14. | Phase 2 / Second part | OIP Local government bodies | - | Çaycuma District Governorship | 24.08.2023 | Field Visit Face to Face Interview |
| 15. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Culture and Tourism | 24.08.2023 | Field Visit Face to Face Interview |
| 16. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Trade | 24.08.2023 | Field Visit Face to Face Interview |
| 17. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Turkish Employment Agency (İŞKUR) | 24.08.2023 | Field Visit Face to Face Interview |
| 18. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Regional Port Authority Republic of Türkiye Ministry of Transport and Infrastructure | 24.08.2023 | Field Visit Face to Face Interview |
| 19. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Health | 25.08.2023 | Field Visit Face to Face Interview |
| 20. | Phase 2 / Second part | OIP Local government bodies | - | Zonguldak Province Municipality | 25.08.2023 | Field Visit Face to Face Interview |
| 21. | Phase 2 / Second part | OIP Local government bodies | - | Republic of Türkiye General Directorate of Forestry, Zonguldak Regional Directorate of Forestry | 25.08.2023 | Rejected |
| 22. | Phase 2 / Third part | PAP Local representative | Indirect | Derecikören Village Mukhtar | 04.02.2025 | Field Visit Face to Face Interview |
| 23. | Phase 2 / Third part | PAP Local representative | Indirect | Sefercik Neighborhood Mukhtar | 05.02.2025 | Field Visit Face to Face Interview |
| 24. | Phase 2 / Third part | PAP Local representative | Indirect | Sazköy Mukhtar | 05.02.2025 | Field Visit Face to Face Interview |
| 25. | Phase 2 / Third part | PAP Local representative | Indirect | Gökçeler Village Mukhtar | 05.02.2025 | Field Visit Face to Face Interview |
| 26. | Phase 2 / Third part | PAP Local representative | Indirect | Aşağııhsaniye Village Mukhtar | 05.02.2025 | Field Visit Face to Face Interview |
| 27. | Phase 2 / Third part | PAP Local representative | Indirect | Öteyüz Neighborhood Mukhtar | 05.02.2025 | Field Visit Face to Face Interview |
| 28. | Phase 2 / Third part | OIP Local government bodies | - | Caycuma Municipality - National Real Estate Directorate | 04.02.2025 | Field Visit Face to Face Interview |
| 29. | Phase 2 / Third | OIP Local | - | Çaytaş Ateş Tuğla Sanayi ve Ticaret A.Ş. | 04.02.2025 | Field Visit Face to |

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| # | Project Phase | Identification | Relation | Stakeholder | Date of Interview (dd.mm.yyyy) | Type of Interview |
| | part | government institutions | | | | Face Interview |
| 30. | Phase 2 / Third part | OIP Local government institutions | - | Gökçeler Village Women | 04.02.2025 | Field Visit Focus Group Interview |
| 31. | Phase 2 / Third part | OIP Local government institutions | - | Çaycuma Governorship - National Real Estate Service Chief Office | 05.02.2025 | Field Visit Face to Face Interview |
| 32. | Phase 2 / Third part | OIP Local government institutions | - | Çaycuma Municipality | 06.02.2025 | Field Visit Face to Face Interview |
| 33. | Phase 2 / Third part | OIP Local government institutions | - | Çaycuma Agricultural Credit Cooperative No. 2958 | 06.02.2025 | Field Visit Face to Face Interview |
| 34. | Phase 2 / Third part | OIP Local government institutions | - | Zonguldak Municipality | 06.02.2025 | Field Visit Face to Face Interview |
| 35. | Phase 2 / Fourth part | PAP Local representative | Direct | Derecikören Village Mukhtar | 18.09.2025 | Field Visit Face to Face Interview |
| 36. | Phase 2 / Fourth part | PAP Local representative | Direct | Gökçeler Village Mukhtar | 18.09.2025 | Field Visit Face to Face Interview |
| 37. | Phase 2 / Fourth part | PAP Local residents | Direct | Gökçeler Village local residents | 18.09.2025 | Field Visit Face to Face Interview |
| 38. | Phase 2 / Fourth part | OIP Local government institutions | - | Filyos Municipality | 18.09.2025 | Field Visit Face to Face Interview |
| 39. | Phase 2 / Fourth part | OIP Local government institutions | - | Zonguldak Provincial Special Administration | 18.09.2025 | Field Visit Face to Face Interview |
| 40. | Phase 2 / Fourth part | OIP Local government institutions | - | Çaycuma Governorship District | 18.09.2025 | Field Visit Face to Face Interview |

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Appendix-7: Minutes of Meetings

Summary of Engagement Activities for Phase 2- September 2022

| Date | Venue | Type | Stakeholders | Number of Participants | Meeting Results |
|------------|--------|--------------|---|--|---|
| 22.09.2022 | Filyos | Face to face | 23rd Provincial Directorate of General Directorate of State Hydraulic Works | 1 individual Department Manager | ✓ There is a "Flood Protection Project", which was prepared due to the increase in flow; Bed Width 230 m, Height of the embankment 6,5 m, Length 13 km Existing railway bridge does not meet bed width |
| 22.09.2022 | Filyos | Face to face | Western Black Sea Development Agency | 7 individuals Head of Project Monitoring and Evaluation Unit Coordinator Head of Tourism Promotion and Branding Unit Specialist Specialist Sustainability Unit Manager Specialist | ✓ When gas came out of the free zone, an area of 1,200,000 m ² was given to Turkish Petroleum Corporation. ✓ Work continues at the treatment site. ✓ National parks are required to be registered. ✓ Parks will be built in the bird sanctuary within the scope of social responsibility. ✓ The Chrome Factory Project has been cancelled. ✓ A techno-park will be built at Bartın University. ✓ There is no area intersection with Zonguldak Coal Geopark, which is in the process of applying for full membership to the UNESCO ¹¹ global geopark network, however it needs to be followed. |
| 22.09.2022 | Filyos | Face to face | Zonguldak Provincial Directorate Industry Technology of | 2 individuals Provincial Director of Zonguldak Deputy of Branch Manager | ✓ Tosyali Holding Fertilizer Factory ✓ Expropriation was completed in late 1990 and leases are being made. There is an annotation on the construction of a flood structure in the lease contracts. ✓ The Free Zone will be expanded along the Filyos Valley and new industrial projects are expected to be developed. |
| 22.09.2022 | Filyos | Face to face | Zonguldak Special Provincial Directorate | 1 individual General Secretary | ✓ A Natural Gas Tank was built to prevent interruptions. ✓ ZONÇEB, which converts waste into energy, was established in the Koroğlu village. ✓ The road project will be completed at the end of 2024. ✓ A zoning plan is being prepared with İlbank (1/5000 and 1/1000). |
| 22.09.2022 | Filyos | Face to face | Zonguldak Provincial Directorate of Environment, | 1 individual Deputy Manager of Provincial Directorate | ✓ Nearly 340 bird species, nearly 200 shelters for birds ✓ Stream bed cleaning is done at 3 points. |

¹¹ United Nations Educational, Scientific and Cultural Organization

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| Date | Venue | Type | Stakeholders | Number of Participants | Meeting Results |
| | | | Urbanization and Climate Change | | |
| 23.09.2022 | Filyos | Face to face | Petroleum Pipeline Corporation (BOTAŞ) | 1 individual Building Inspector | Information about Botaş lines was collected and the information on grievance redress mechanism, focal points, proposed project schedule, ESIA revision works was given. |
| 23.09.2022 | Filyos | Face to face | Site visits to the nearest settlements along project route (Sazköy and Öteyüz) | 3 individuals Muhktar of Sözköy Village Muhktar of Derekören Village Muhktar of Aşağı İhsaniye Village | Information was provided about the grievance redress mechanism, contact information, proposed project schedule, and ESIA revision studies. |
| 23.09.2022 | Filyos | Face to face | Karabük Cultural Heritage Conservation Regional Board | 1 individual Archaeologist | Information about cultural heritage was obtained. |

Summary of Engagement Activities for Phase 2- August 2023

| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
|------------|---|------------------------------------|-----------------------------|------------------------|--|
| 24.08.2023 | Filyos Town Municipality | Field Visit Face to Face Interview | OIP Local government bodies | 1 | More communication is expected |
| 24.08.2023 | Filyos Öteyüz, Filyos Sefercik, Çaycuma Aşağııhsaniye, Çaycuma Derekören, Çaycuma Gökçeler and Çaycuma Sazköy | Field Visit Focus Group Discussion | PAP Local representative | 6 | Their primary request is an immediate disclosure of the expropriation list, as the lack of information has hindered their agricultural investments for nearly three years. |
| 24.08.2023 | Zonguldak Chamber of Commerce and Industry | Field Visit Face to Face Interview | OIP Trade and development | 2 | Key projects include Filyos Valley Project, Çaycuma SERA-OSB ¹² , Filyos Kilimli Project, and Filyos Logistics Center Project. |
| 24.08.2023 | Western Blacksea Development Agency (BAKKA) | | | | |
| 24.08.2023 | Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Agriculture and Forestry | Field Visit Face to Face | OIP Local government | 1 | Pasture division due to railway construction |

¹² Agriculture-Based Specialized Organized Industrial Zone

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| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
| | | Interview | bodies | | may pose problems, and underpasses or crossings should be considered to connect grazing areas, benefiting both livestock and local wildlife. |
| 24.08.2023 | Çaycuma District Municipality | Field Visit Face to Face Interview | OIP Local government bodies | 3 | They've expressed that they're open to collaboration with DGII |
| 24.08.2023 | Zonguldak Provincial Directorate of Republic of Türkiye, Ministry of Environment, Urbanization and Climate Change | Field Visit Face to Face Interview | OIP Local government bodies | 1 | The purpose of the connecting line and the nature of transported materials raise questions, including concerns about noise and dust. |
| 24.08.2023 | Çaycuma District Governorship | Field Visit Face to Face Interview | OIP Local government bodies | 1 | The objectives of the project have been viewed positively. |
| 24.08.2023 | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Culture and Tourism | Field Visit Face to Face Interview | OIP Local government bodies | 1 | The project, indirectly, can boost tourism by encouraging the development of dining, accommodation, and transportation facilities for employees, which can also create job opportunities. |
| 24.08.2023 | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Trade | Field Visit Face to Face Interview | OIP Local government bodies | 1 | The project has the potential to significantly benefit Çaycuma, given the high demand for projects in the region and the role of the institution in reviewing and forwarding requests to the Ministry. |
| 24.08.2023 | Zonguldak Provincial Directorate of Turkish Employment Agency (İŞKUR) | Field Visit Face to Face | OIP Local government | 1 | Contractors also engaged new subcontractors |

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| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
| | | Interview | bodies | | and expanded their personnel searches to a broader pool due to challenges in finding qualified workers in the province and districts |
| 24.08.2023 | Zonguldak Regional Port Authority Republic of Türkiye Ministry of Transport and Infrastructure | Field Visit Face to Face Interview | OIP Local government bodies | 1 | The investment is crucial for primary raw materials and heavy industry, particularly for the industrial zone. |
| 25.08.2023 | Zonguldak Provincial Directorate of Republic of Türkiye Ministry of Health | Field Visit Face to Face Interview | OIP Local government bodies | 1 | It is warned that there are sensitive swimming areas and natural water sources that are regularly inspected by the Ministry of Health. |
| 25.08.2023 | It is warned that there are sensitive swimming areas and natural water sources that are regularly inspected by the Ministry of Health. | Field Visit Face to Face Interview | OIP Local government bodies | 1 | It is expected that the project will increase local employment and stimulate the local economy. |

Summary of Engagement Activities for Phase 2- February 2025

| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
|------------|-------------------------------|------------------------------------|--------------------------|------------------------|---|
| 04.02.2025 | Derekören Village Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | The Project route is considered to have a negative impact on the village in terms of the places it passes through. It is considered that the project will not have any impact on the livelihood of the neighborhood. |
| 05.02.2025 | Sefercik Neighborhood Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | Sefercik station is very actively used. For this reason, repair and maintenance of the station is requested. |
| 05.02.2025 | Sazköy Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | In order to improve economic activities in the settlement, it was stated that it would be useful to provide training to men on agriculture, animal husbandry (especially cattle breeding) and aromatic plants. The general opinion about the Project |

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| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
| | | | | | is negative. The main concerns are issues such as dust, mud, security during the construction phase of the Project and the possibility of blocking access roads to Filyos during the operation phase. |
| 05.02.2025 | Gökçeler Village Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | The project route is not expected to pass through the village. It is stated that the project will negatively affect the village as there is no land left in the village. |
| 05.02.2025 | Aşağıihsiye Village Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | It was stated that it would be useful to provide training for those working in industry. The positive impact of the project is evaluated as providing employment. According to Mukhtar, there may be a negative impact due to expropriation. |
| 05.02.2025 | Öteyüz Neighborhood Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | It is considered that the village will not be affected by the land acquisition phase of the Project as agriculture and animal husbandry activities are not carried out. During the construction phase, it was emphasized that precautions should be taken regarding speeding of construction machinery, damage to roads and infrastructure, safety and environmental impacts such as dust. |
| 04.02.2025 | Caycuma Municipality - National Real Estate Directorate | Field Visit Face to Face Interview | OIP Local government bodies | 1 | It was stated that the project will not have any impact on agriculture and animal husbandry. |
| 04.02.2025 | Çaytaş Ateş Tuğla Sanayi ve Ticaret A.Ş. | Field Visit Face to Face Interview | OIP Local government institutions | 2 | Since expropriation has been made due to the Organized Industrial Zone (OIZ) in the region, agriculture and animal husbandry activity areas have been limited. Therefore, it is considered that the Project will not affect agriculture and animal husbandry. |
| 04.02.2025 | Gökçeler Village Women | Field Visit Focus Group Interview | OIP Local government institutions | 3 | The increasing unemployment rate due to the inability to carry out agriculture and animal husbandry activities was emphasized. The most important problem in the region is flooding. |
| 05.02.2025 | Çaycuma District Governorship - District National Real Estate Service Chief Office | Field Visit Face to Face Interview | OIP Local government institutions | 1 | Local people are disturbed by the environmental impacts of the fertilizer factory in the region. Sea tourism will decrease due to the environmental damage caused by the fertilizer factory. It was also emphasized that if there is an influx of employees, rents will increase in the region. It was stated that agriculture and animal husbandry activities were carried out before the OIZ, and although expropriation was made in the Filyos free zone, it was left open for informal agriculture. |

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| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
| 06.02.2025 | Çaycuma Municipality | Field Visit Face to Face Interview | OIP Local government institutions | 1 | There are negative effects such as dust due to loading trains without tarpaulins. It was emphasized to take measures regarding this issue. The project will not have any positive or negative impact on the region. |
| 06.02.2025 | Çaycuma Agricultural Credit Cooperative No. 2958 | Field Visit Face to Face Interview | OIP Local government institutions | 1 | It was stated that the project will have a positive impact on companies using the highway, and that the use of the railway will reduce transportation costs and create a positive impact. |
| 06.02.2025 | Zonguldak Municipality | Field Visit Face to Face Interview | OIP Local government institutions | 1 | Since tourism and industrial activities are predominant in the region, there will be no impact on agriculture and animal husbandry activities. |

Summary of Engagement Activities for Phase 2- September 2025

| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
|------------|----------------------------------|------------------------------------|-----------------------------------|------------------------|---|
| 18.09.2025 | Derekören Village Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | A consultation was conducted to determine whether the public parcel had any formal or informal users, and no users were identified on the parcel in question. One of the privately owned parcels in Gökçeler is co-owned by the mukhtar. Through the mukhtar and her spouse, access was attempted to the person who is the heir of the owner of the legally disputed private parcel; however, the interview was rejected by heir. |
| 18.09.2025 | Gökçeler Village Mukhtar | Field Visit Face to Face Interview | PAP Local representative | 1 | Together with the mukhtar, information was compiled regarding where the individuals listed as PAPs live and whether they are alive. For the consultations that could not be completed in February, the mukhtar provided additional support to reach these individuals. Consultations were also held with the village headman regarding the users of public lands; however, no formal or informal users could be identified. |
| 18.09.2025 | Gökçeler Village local residents | Field Visit Face to Face Interview | PAP Local representative | 3 | Missing information about the PAPs and the older residents of the village, compared to the mukhtar, was compiled. At the same time, the situation of users on public parcels was investigated. The gaps in the list prepared with the mukhtar were filled through these individuals. These participants confirmed that there are no users on the indicated public parcels. |
| 18.09.2025 | Filyos Municipality | Field Visit Face to Face Interview | OIP Local government institutions | 1 | The information obtained during the consultations with this institution in February was confirmed during the follow-up visit. No users were identified for the public parcels. Consultation with this institution was |

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| Date | Venue | Type | Stakeholders | Number of participants | Outcomes/ feedback/key questions |
| | | | | | recommended because most of the relevant lands are within the Zonguldak Provincial Special Administration's jurisdiction boundaries. |
| 18.09.2025 | Zonguldak Provincial Special Administration | Field Visit Face to Face Interview | OIP Local government institutions | 2 | The relevant institution stated that there are no formal or informal users within the boundaries of its own jurisdiction. However, they indicated that, since most of the public parcels fall within the TPAO boundaries, they do not have information regarding the use of these areas. |
| 18.09.2025 | Çaycuma District Governorship | Field Visit Face to Face Interview | OIP Local government institutions | 1 | The institution was contacted again to confirm the information obtained in February; however, no additional information could be obtained. |

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Appendix-8: Photographs taken during the interviews

| Date | Province / District / Settlement | Stakeholder | Type of Interview | Photograph |
|------------|--|---------------------------------------|--|--|
| 04.02.2025 | Zonguldak / Çaycuma Derekören Village | Derekören Village Mukhtar | Mukhtar Interview Face-to-face Interview |  |
| 04.02.2025 | Zonguldak / Çaycuma Derekören Village | Derekören Local Community | Household Interview Face-to-face Interview |  |
| 05.02.2025 | Zonguldak / Çaycuma Sefercik Neighborhood | Sefercik Neighborhood Mukhtar | Mukhtar Interview Face-to-face Interview | |
| 05.02.2025 | Zonguldak / Çaycuma Sefercik Neighborhood | Sefercik Neighborhood Local Community | Household Interview Face-to-face Interview | |

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| Date | Province / District / Settlement | Stakeholder | Type of Interview | Photograph |
| | | | |  |
| 05.02.2025 | Zonguldak / Çaycuma Sazköy | Sazköy Mukhtar | Mukhtar Interview Face-to-face Interview | |
| 05.02.2025 | Zonguldak / Çaycuma Sazköy | Sazköy Local Community | Household Interview Face-to-face Interview | |
| 05.02.2025 | Zonguldak / Çaycuma Gökçeler Village | Gökçeler Village Mukhtar | Mukhtar Interview Face-to-face Interview |  |
| 05.02.2025 | Zonguldak / Çaycuma Gökçeler Village | Gökçeler Village Local Community | Household Interview Face-to-face Interview | |

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| Date | Province / District / Settlement | Stakeholder | Type of Interview | Photograph |
| | | | |   |
| 05.02.2025 | Zonguldak / Çaycuma Aşağıihsaniye Village | Aşağıihsaniye Village Mukhtar | Mukhtar Interview Face-to-face Interview | |
| 05.02.2025 | Zonguldak / Çaycuma Öteyüz Neighborhood | Öteyüz Neighborhood Mukhtar | Mukhtar Interview Face-to-face Interview | |
| 04.02.2025 | Zonguldak / Çaycuma | Çaycuma Municipality - National Real Estate Directorate | Institutional Interview Face-to-face Interview | |
| 04.02.2025 | Zonguldak / | Çaytaş Ateş | Institutional | |

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| Date | Province / District / Settlement | Stakeholder | Type of Interview | Photograph |
| | Çaycuma | Tuğla Sanayi ve Ticaret A.Ş. | Interview Face-to-face Interview | |
| 04.02.2025 | Zonguldak / Çaycuma Gökçeler Village | Gökçeler Village Women | Focus Group Discussion Face-to-face Interview |  |
| 05.02.2025 | Zonguldak / Çaycuma | Çaycuma District Governorship - District National Real Estate Service Chief Office | Institutional Interview Face-to-face Interview | |
| 06.02.2025 | Zonguldak / Çaycuma | Çaycuma Municipality | Institutional Interview Face-to-face Interview | |
| 06.02.2025 | Zonguldak / Çaycuma | Çaycuma Agricultural Credit Cooperative No. 2958 | Institutional Interview Face-to-face Interview | |
| 06.02.2025 | Zonguldak / Centre | Zonguldak Municipality | Institutional Interview Face-to-face Interview | |

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| Date | Province / District / Settlement | Stakeholder | Type of Interview | Photograph |
| 18.09.2025 | Zonguldak / Gökçeler | PAP | Mukhtar Interview Household Interview Face-to-face Interview |  |

| | | |
|-----------------------------|------------------|-----------------|
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Appendix-9: Stakeholder Consultation Meeting for Information Disclosure

Appendix 9.1. Project Brochure

PROJECT OVERVIEW

The Filyos Port and Industrial Zone Railway Connection Line Project is a transportation infrastructure project aimed at connecting Filyos Port, the Filyos Industrial Zone, and related industrial facilities—located within the boundaries of Çaycuma District of Zonguldak Province—to the national railway network. The Project covers the construction of new railway connection lines extending from Gökçeler Station on the İrmak-Zonguldak Railway Line to Filyos Port, as well as associated engineering structures and auxiliary facilities.

The Project Owner is the General Directorate of Infrastructure Investments (AYGM) of the Ministry of Transport and Infrastructure of the Republic of Türkiye. The Project will be implemented with financing from the World Bank under the Railway Logistics Improvement Project (RLIP). Upon completion of the construction phase, the responsibility for operation will be transferred to the General Directorate of Turkish State Railways (TCDD).

- Within the scope of the Project, approximately 7 km of double-track railway connection line will be constructed.
- Additional railway lines will be developed at Gökçeler Station to serve potential future port extensions.
- With these arrangements, the total track length will reach approximately 17 km.

The construction and operation phases of the Project will be carried out in compliance with the World Bank Environmental and Social Standards and the requirements of national legislation.

ESIAs

- ESI1: Assessment and Management of Environmental and Social Risks and Impacts
- ESI2: Labor and Working Conditions
- ESI3: Resource Efficiency and Pollution Prevention and Management
- ESI4: Community Health and Safety
- ESI5: Land Acquisition, Restrictions on Land Use and involuntary Resettlement
- ESI6: Biodiversity Conservation and Sustainable Management of Living
- ESI7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local
- ESI8: Cultural Heritage
- ESI9: Financial Intermediaries
- ESI10: Stakeholder Engagement and Information Disclosure

FİLYOS PORT AND INDUSTRIAL ZONE RAILWAY CONNECTION LINE PROJECT



Project Objective: The primary objective of the Filyos Port and Industrial Zone Railway Connection Line Project is to ensure the effective, safe, and sustainable integration of Filyos Port, the Filyos Industrial Zone, and related industrial facilities into the national railway network; to increase the share of rail transport in freight transportation by enhancing logistics efficiency; and to contribute to regional economic development.

Within the scope of the Project, it is aimed to transport the cargo produced and handled at the port and industrial zone through an environmentally friendly mode of transportation, reduce dependency on road transport, lower greenhouse gas emissions, and minimize transportation-related environmental and social impacts.

Project Implementing Agency: **AYGM** (Altıya Yatırımları Genel Müdürlüğü)

Financed by: **WORLD BANK GROUP**

Contractor: **RÖNESANS HOLDING**

Supervision Consultant: **ep4sa (EOOE JV)**

GRIEVANCE MECHANISM

| | Directorate General of Infrastructure Investments | Community Liaison Officer (EOOE JV) |
|---------|--|--|
| E-mail | Ibrahim UNAL ibrahim.unal2@uab.gov.tr İbrahim Görkem GÖKMEN: igorkem.gokmen@uab.gov.tr Hazal BABUR hazal.babur@uab.gov.tr | Hakan KIZILTAN hakan.kiziltan@rionesans.com |
| Website | https://aygm.uab.gov.tr/ | - |
| Address | Hakkı Turaylıç Cad. No:5 06338 Emek/Çankaya/ANKARA | - |
| Phone | +90 (312) 203 10 00 / 3059 | +90 (531) 797 22 77 |

Presidential Communication Center (CİMER):

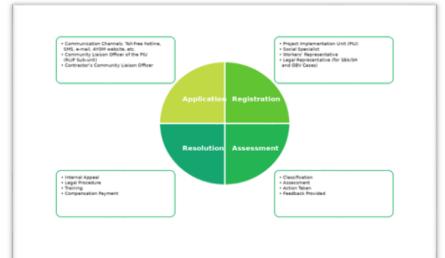
- Website: www.cimer.gov.tr
- Call Center: 150
- Phone: +90 312 525 55 55
- Fax: +90 0312 473 64 94

Foreigners Communication Center (YİMER):

- Website: www.yimer.gov.tr
- Call Center: 157
- Phone: +90 312 5157 11 22
- Fax: +90 0312 920 06 09

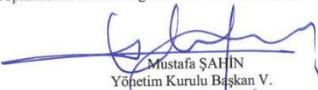
World Bank Grievance Redress Service:

- Online Access: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>
- E-mail: grievances@worldbank.org



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Appendix 9.2 Official Announcement

|  <div style="text-align: right; margin-top: -10px;">  </div> <div style="text-align: right; margin-top: 10px;"> Tarih: 08.01.2026 </div> <p> Sayı : 25 Konu : Filyos Limanı ve Endüstri Bölgesi Demiryolu İltisak Hattı Bağlantısı Projesi Paydaş Katılım Toplantısı Hk. </p> <p style="text-align: center;">DAĞITIM YERLERİNE</p> <p>T.C. Ulaştırma ve Altyapı Bakanlığı, Altyapı Yatırımları Genel Müdürlüğü tarafından yürütülmekte olan "Filyos Limanı ve Endüstri Bölgesi Demiryolu İltisak Hattı Bağlantısı Projesi" kapsamında, Çevresel ve Sosyal Danışman firma "Cinar Mühendislik Müşavirlik A.Ş." tarafından çevresel ve sosyal dokümanlar hazırlanmıştır. Projenin çevresel ve sosyal etki değerlendirmesine ilişkin olarak, halkın ve ilgili paydaşlarının bilgilendirilmesi, görüş ve önerilerinin alınması amacıyla aşağıda bilgileri iletilen adreste 15.01.2026 tarihinde "Paydaş Katılım Toplantısı" gerçekleştirilecektir.</p> <p>Proje hakkında detaylı bilgi ve hazırlanan dokümanlar https://aygm.uab.gov.tr/dunya-bankasi-turkiye-de-demiryolu-lojistigini-gelistirme-projesi adresinde yer almaktadır. Çevresel ve sosyal dokümanlar ile ilgili toplantı hakkında, Ek-1'de yer alan yerleşim birimlerinin yerel yönetimi ve muhtarlıklarının bilgilendirilmesi önem arz etmektedir.</p> <p>Bu kapsamında, belirtilen Paydaş Katılım Toplantısına katılım sağmanızı ve süreçte katkı sunmanızı önemle rica ederiz.</p> <div style="text-align: center; margin-top: 10px;">  <p>Mustafa ŞAHİN Yönetim Kurulu Başkan V.</p> <div style="text-align: center;">  <p>B-İşbu Mühendislik ve Danışmanlık Hizmetleri Ltd. Şti. Fikirtepe Mah. Çınar Plaza No:66/5 06790 Etimesgut / ANKARA / TÜRKİYE Tel: 444 9 267 - Tel: (0312) 472 38 39 - Fax: (0312) 472 39 33 GSM:(0533) 763 42 54 KEP: cinarmuhendislik@h501.cep.tr e-posta: cinar@cinarmuhendislik.com www.cinarmuhendislik.com</p> </div> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 20px;"> <thead> <tr> <th style="text-align: center; padding: 2px;">Toplantı Yeri</th> <th style="text-align: center; padding: 2px;">Adres</th> <th style="text-align: center; padding: 2px;">Toplantı Tarihi</th> <th style="text-align: center; padding: 2px;">Toplantı Saati</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; padding: 2px;">Filyos Belediyesi Çok Amaçlı Salonu</td> <td style="text-align: center; padding: 2px;">Hisarönü Mahallesi Namık Kemal 2 Sokak No:4 Çaycuma /ZONGULDAK</td> <td style="text-align: center; padding: 2px;">15.01.2026</td> <td style="text-align: center; padding: 2px;">14:00</td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 10px;"> Ek-1 Yerleşim Yerlerinde Yer Alan Muhtarlıklar Dağıtım: Dağıtım Listesi İletişim için: İlksen ÖZÇAKMAK/Çevre Mühendisi/Tel: 0541 860 93 63 </p> <div style="text-align: center; margin-top: 20px;">    <p style="text-align: center; margin-top: 5px;"> Bağlıca Mahallesi Çambayır Caddesi Çınar Plaza No:66/5 P.K. 06790 Etimesgut / ANKARA / TÜRKİYE Tel: 444 9 267 - Tel: (0312) 472 38 39 - Fax: (0312) 472 39 33 GSM:(0533) 763 42 54 KEP: cinarmuhendislik@h501.cep.tr e-posta: cinar@cinarmuhendislik.com www.cinarmuhendislik.com </p> </div> | Toplantı Yeri | Adres | Toplantı Tarihi | Toplantı Saati | Filyos Belediyesi Çok Amaçlı Salonu | Hisarönü Mahallesi Namık Kemal 2 Sokak No:4 Çaycuma /ZONGULDAK | 15.01.2026 | 14:00 |
|--|--|-----------------|-----------------|----------------|--|--|------------|-------|
| Toplantı Yeri | Adres | Toplantı Tarihi | Toplantı Saati | | | | | |
| Filyos Belediyesi Çok Amaçlı Salonu | Hisarönü Mahallesi Namık Kemal 2 Sokak No:4 Çaycuma /ZONGULDAK | 15.01.2026 | 14:00 | | | | | |

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Appendix 9.3 Announcement Photos

| Location of the announcement | Photograph |
|---------------------------------------|---|
| Derekören Village Mukhtar's Office |  |

| Location of the announcement | Photograph |
|---------------------------------|------------|
| | |
| Gökçeler railway station | |

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| Location of the announcement | Photograph |
|------------------------------|---|
| |  <p data-bbox="774 1208 843 1320">A white notice is pinned to the brown wooden door of the yellow building.</p> <p data-bbox="1133 961 1287 1343">A train schedule board is mounted on the yellow wall to the right of the door. The board displays train times and routes for various destinations.</p> |

| | | |
|------------------------------------|------------------|------------------------|
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| Location of the announcement | Photograph |
|------------------------------|------------|
| | |
| Gökçeler bus stop | |

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| Location of the announcement | Photograph | |
| |  | |
| Gökçeler Village Mukhtar's Office |  | |

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| Location of the announcement | Photograph |
|---|--|
| Filyos Municipality Multi-Purpose Hall (Meeting place) |  |

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Appendix 9.4 Meeting Photos



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Appendix 9.5 Filyos Stakeholder Participation Meeting Minutes

MINUTES OF THE MEETING (MoM)

Filyos Railway Logistics Improvement Project (RLIP)

Public Consultation and ESIA Public Disclosure Meeting

| | |
|------------------------------------|---|
| Date | January 15, 2026 |
| Location | Filyos Municipality Multipurpose Meeting Hall |
| Meeting Start and End Times | 2:00 PM - 3:30 PM |
| Number of Participants | 51 |
| Purpose of the Meeting | The meeting aimed to disclose the ESIA, ESMP, SEP, and RP documents, provide general information about the Project, and present the potential environmental and social risks and corresponding mitigation measures, while also gathering feedback from stakeholders. |
| Institutional Participants | AYGM PIU Representatives Çınar Consulting Engineering Inc. Construction Supervision Consultant: Eptisa EOOE JV Contractor: RBH Filyos Joint Venture |
| | Mayor of Filyos Municipality Representatives of Filyos Municipality Representatives of Çaycuma Municipality Representatives of Political Parties of Filyos Representatives of the Provincial Directorate of Social Services (ŞÖNİM) Çaycuma Municipality Environment, Urban Planning, and Climate Change Director Representatives of Black Sea Development Agency Representatives of Zonguldak Provincial Directorates of Agriculture Representatives of Çaycuma District Directorates of Agriculture Representatives of Museum Directorate Municipal Council Members Zonguldak Chamber of Commerce and Industry TCDD Muhtars of Affected Settlements Local residents and other relevant stakeholders |
| Questions | Answers |

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| | | |
|---|--|---|
| 1 | <p>We experienced a lack of effective engagement and transparency about employment processes in previous projects. How will this Project establish proper and continuous communication with the local community going forward?</p> <p>(Local People from Gökçeler Village)</p> | <p>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 regular information sharing, defined communication channels, and an operational Grievance Mechanism (GM) to address community concerns regarding communication, land-related processes, and employment matters throughout the Project lifecycle.</p> |
| 2 | <p>If there will be any additional expropriation of private land outside the currently expropriated area, how can information regarding this process be accessed?</p> <p>(Mayor of Filyos)</p> | <p>The relevant information will be made available on notice boards and other appropriate locations, will be updated as necessary, and will remain publicly accessible throughout the Project lifecycle, information will be made available through the project website and will also be physically shared with the relevant local authorities (mukhtarship) and other public locations, such as local markets and coffee shops, to ensure accessibility for the local community.</p> |
| 3 | <p>Where can the project map and route, including the exact start and end points, be accessed?</p> <p>(Local People from Gökçeler Village)</p> | <p>The project alignment, including the exact start and end points, is defined in the approved project maps and technical documents. These documents will be made available on the project website and will also be physically shared with relevant local authorities (mukhtarships) and other public locations, such as local markets and coffee shops, to ensure accessibility for the local community.</p> |
| 4 | <p>How will communication with the local community be managed during the Project?</p> <p>(Muhtar of Sefercik Village)</p> | <p>Communication with the local community will be maintained through regular information disclosure and engagement activities in line with the Stakeholder Engagement Plan. These activities will be conducted on a continuous basis throughout the Project lifecycle to ensure timely and accessible information sharing.</p> |

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|---|---|--|
| 5 | <p>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 during the construction and operation phases?</p> <p>(Çaycuma Municipality Environment, Urban Planning, and Climate Change Director)</p> | <p>Potential impacts on bird migration routes and sensitive species have been assessed under the EIA and the Project's environmental and social documents. Baseline studies and field surveys were conducted by qualified experts, and biodiversity monitoring will be carried out during both construction and operation phases in line with national requirements and international standards.</p> |
| 6 | <p>How will employment-related practices, including recruitment and working conditions, be handled during the Project?</p> <p>(Representative from Black Sea Development Agency)</p> | <p>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.</p> |
| 7 | <p>There is a serious dust problem in our neighborhood caused mainly by other ongoing projects. How will cumulative dust impacts be addressed?</p> <p>(Local People from Gökçeler Village)</p> | <p>While dust generated by other projects is outside the Project's direct control, dust mitigation measures within the Project Area will be implemented in accordance with the ESMP. Community concerns will be communicated to relevant authorities, and dust-related grievances will be addressed through the Grievance Mechanism.</p> |
| 8 | <p>Due to the ongoing other projects, our village roads have been damaged. What will be your approach to this issue, and how will such situations be handled under this Project?</p> <p>(Local People from Gökçeler Village)</p> | <p>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 the relevant authorities and entities and in line with the ESMP. Where necessary, repair and reinstatement works will be carried out during the Project implementation or following the completion of construction activities.</p> |

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| | | |
|----|--|---|
| 9 | <p>In previous land acquisition processes, no support was provided to Project Affected Persons other than compensation payments. Will this Project provide any additional support?</p> <p>(Local People from Sefercik Village)</p> | <p>Land acquisition will be carried out in accordance with the Resettlement Plan. Beyond compensation payments, the RP includes measures to support affected households, particularly vulnerable PAPs, through consultation-based and needs-oriented approaches.</p> |
| 10 | <p>After the completion of construction, which institution will be responsible for the operation and management of the railway line?</p> <p>(TCDD Representative)</p> | <p>Following the completion of the construction works, the operation and management of the railway line will be transferred to the Turkish State Railways (TCDD), and all operational activities will be carried out in accordance with national regulations and TCDD procedures.</p> |
| 11 | <p>Will there be any special support for vulnerable groups?</p> <p>(Local People from Sefercik Village)</p> | <p>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 disclosed in line with the Stakeholder Engagement Plan and will be provided in a clear and accessible manner to ensure inclusiveness.</p> |

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Appendix 9.5 Frequently Asked Questions

FREQUENTLY ASKED QUESTIONS

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

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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.

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.

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?

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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?

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?

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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.