



FILYOS PORT/INDUSTRIAL ZONE CONNECTIONS STAKEHOLDER ENGAGEMENT PLAN

Prepared According to the World Bank Environmental and Social
Standards

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Report Submission Date	5/14/2020

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ABBREVIATIONS

CIMER - T.C. Presidency Communication Center

DGoll - Directorate General of Infrastructure Investments

ESIA - Environmental and Social Impact Assessment

ESS - Environmental and Social Standards

FGD - Focus Group Discussions

GRM - Grievance Redress Mechanism

IFC - International Finance Corporation

MoTI - Ministry of Transport and Infrastructure

NGO - Non-Governmental Organization



OIZ - Organized Industrial Zone

PAP - Project Affected Person

PIU - Project Implementation Unit

SEP - Stakeholder Engagement Plan

WB - World Bank

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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 in the course of implementation of the Filyos Port and Industrial Zone Connection under Component 1 of Improving Railway Connectivity Project (hereafter referred to as “Filyos Port and Industrial Zone Connection Project” or just “Project”). By undertaking activities proposed in this SEP, Ministry of Transport and Infrastructure General Directorate of Infrastructure Investments (MoTI-DGoll) that is carrying out the Project, demonstrates its openness, responsiveness and willingness to embark on the constructive dialogue with its stakeholders. Project Implementation Unit (PIU) in DGoll will be responsible for implementing the SEP.

MoTI-DGoll 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-DGoll 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-DGoll 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

Stakeholder engagement 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 PIU and different stakeholders continuously. Information regarding the project, environmental and social risks and impacts, proposed mitigation measures, resettlement plans, grievance redress mechanism, will be shared with project stakeholders on a regular basis.



The report 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..

1.1. Brief Project Description

Improving Railway Connectivity Project aims to increase rail freight efficiency in Turkey by improving last-mile connectivity (LMC), enhancing the operational efficiency of logistics centers and strengthening institutional capacity. The main objective of the Project is to make the transportation of raw materials and products economical by improving the infrastructure connection between industrial zones (OIZ-Port connection, OIZ-Main line connection). The Project is developed around three main components;

- Component 1 - Construction of two strategic railway branch lines: This component includes two main branching lines, Çukurova Region & Iskenderun Bay railway connection and Filyos Port/Industrial Zone connections, as well as one or two more projects to be selected from the list of 10 potential LMCs
- Component 2 - Design & Consultancy: This component includes survey, design and feasibility studies for the 10 potential LMCs identified by the Ministry as well as supervision of the construction works under Component 1.
- Component 3 - Rail sector reform: This component is a natural continuation of the ongoing EU IPAll funded TA on promoting intermodality and rail modal share which is the top priority of the Ministry and national government.

Filyos Port is planned to become one of the most important ports of the Black Sea within the scope of "Filyos Valley Project". The capacity of the Port is expected to be 25 million tons / year when the construction is completed. With the development of this Filyos Valley Project, the increase in the capacity of the port will raise the problem of transportation and

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distribution of goods arriving at the port. Thus, the Project was developed in order to transport the port's capacity in the safest and most cost-effective manner.

The Filyos railway will be constructed in Caycuma District of Zonguldak Province, located in the western part of the Black Sea region of Turkey. Filyos railway consists of 12 km of railway, 4.5 km of road including a bridge over Filyos creek. The sub-project will connect Filyos Port which is under construction (started in July 2016) to the already existing railway network. There will be 2 stations to be constructed within the scope of the sub-project.

1.2. Objectives of Stakeholder Engagement Plan (SEP)



The main goal of the Stakeholder Engagement Plan is to ensure that all relevant stakeholders (individuals, groups and organizations) affected by and/or interested in the Project are engaged in project activities and information flow with these stakeholders is continuous throughout the project life. Stakeholder engagement is a key activity for such projects; because it enables stakeholders to have information at all stages of the project, to express their expectations and concerns, and to establish an open communication channel with stakeholders in the activities carried out by the investor. The objectives of the SEP are generally as follows:

- Identification of stakeholders indirectly or directly affected by and/or interested in the project
- Defining and planning stakeholder engagement activities that will commence during project preparation and planning and continue in the construction and operation stages of the project
- Determining the frequency of consultation activities, information sharing and level of participation as well as to defining the content of consultation activities
- Establishment of the Grievance Redress Mechanism, which will create an open communication channel for stakeholders at each stage of the project
- Ensuring that concerns and expectations expressed by stakeholders are addressed in the ESIA and in the decision-making and planning stages of the project.

The SEP is prepared to meet the requirements set forth in the World Bank's Social Standards as well as national legislation.

2. REGULATIONS AND REQUIREMENTS

Directorate General of Infrastructure Investments in Ministry of Transport and Infrastructure intends to fund the Filyos Port and Industrial Zone Connection Project partly with foreign loans and has committed to undertake an Environmental and Social Impact Assessment (ESIA) compliant with national and international standards and best Practices. Public consultation meetings have already been performed at the initial stage to inform public about the Project. Engagement activities for disclosure of ESIA and SEP documents will also be held. Consequently, this SEP will abide by the legal framework provided below.

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2.1. Turkish Requirements

Environmental Law: The Environmental Impact Assessment Regulation No. 29186 dated 25.11.2014 obligates stakeholder participation and informing. Article 1 of Article 9 of the Regulation states:

1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.

b) Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.

2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.



3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.

4) The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.

It is stated that distributing brochures, questionnaires, seminars etc. can be done and published before the Public Participation Meeting in order to inform the public by the institutions / organizations qualified by the Ministry in the 4th paragraph of the same article of the EIA Regulation.

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 right to information on the activities of the public institutions and the professional organizations, which qualify as public institutions.

Expropriation Law: The administration action of the expropriation process is done in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

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2.2. World Bank Requirements

Summary of Stakeholder Engagement Requirements in World Bank Environmental and Social Standards

ESS1 requires the Borrower to continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project. For *High Risk and Substantial Risk* projects, the Borrower will provide to the Bank and disclose documentation, as agreed with the Bank, relating to the environmental and social risks and impacts of the project prior to project appraisal. The documentation will address, in an adequate manner, the key risks and impacts of the project, and will provide sufficient detail to inform stakeholder engagement and Bank decision making.



If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated.

As required by ESS2, Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits. A grievance mechanism will be provided for all direct workers and contracted workers¹⁶ (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

According to ESS4, the Borrower will document its emergency preparedness and response activities, resources, and responsibilities, and will disclose appropriate information, as well as any subsequent material changes thereto, to affected communities, relevant government agencies, or other relevant parties. The Borrower will assist and collaborate with affected communities, relevant government agencies and other relevant parties in their preparations to respond effectively to an emergency event, especially where their participation and collaboration will be an important part of an effective response.

The objectives of *ESS8 Cultural Heritage* also include requirements related with stakeholder engagement such as promoting meaningful consultation with stakeholders regarding cultural heritage. The Borrowers are required to identify stakeholders that are relevant for the cultural heritage that is known to exist or is likely to be encountered during the project life cycle. Stakeholders will include, as relevant:

(a) project affected parties, including individuals and communities within the country who use or have used the cultural heritage within living memory; and

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(b) other interested parties, which may include national or local regulatory authorities that are entrusted with the protection of cultural heritage and nongovernmental organizations and cultural heritage experts, including national and international cultural heritage organizations.

Where the Borrower’s project site contains cultural heritage or prevents access to previously accessible cultural heritage sites, the Borrower will, based on consultations with users of the site, allow continued access to the cultural site, or will provide an alternative access route, subject to overriding health, safety and security considerations.

World Bank Environmental and Social Standard 5 (ESS5)



ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

As relevant with stakeholder engagement, the WB ESS5 requires the borrower to prepare a resettlement plan or a resettlement policy framework that includes measures to ensure that the displaced persons are;

- informed about their options and rights pertaining to resettlement;
- consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives;
- provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project

The resettlement plan or resettlement policy framework for impacts covered in this policy, the Bank also requires that displaced persons and their communities, and any host communities receiving them, are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. Appropriate and accessible grievance mechanism is required to be established for these groups.

Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons may choose. Disclosure of relevant information and meaningful participation of affected communities and persons will take place during the consideration of alternative project designs, and thereafter throughout the planning, implementation, monitoring, and evaluation of the compensation process, livelihood restoration activities, and relocation process. The consultation process should ensure that women’s perspectives are obtained and their interests factored into all aspects of resettlement planning and implementation.

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World Bank Environmental and Social Standard 10 (ESS10)

This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

ESS requires borrowers to engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. According to ESS10, Borrowers shall engage in meaningful consultations with all stakeholders, provide them with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The process of stakeholder engagement will involve the following, (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

As set out in detail in the ESS10, the Borrower is required to maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

The Borrower shall identify the different stakeholders, both project-affected parties and other interested parties. Individuals or groups that are affected or likely to be affected by the project will be identified as ‘project affected parties’ and other individuals or groups that may have an interest in the project will be identified as ‘other interested parties’.

The Borrower shall also identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable. Based on this identification, the Borrower shall further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate, forms of engagement. An adequate level of detail shall be included in the stakeholder identification and analysis so as to determine the level of communication that is appropriate for the project.

Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process.

In consultation with the Bank, the Borrower is required to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP shall be disclosed as early as possible, and before project appraisal, and the Borrower shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Borrower shall disclose the updated SEP.

As detailed in ESS10, the Borrower is required to respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower shall propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.

The grievance mechanism shall be proportionate to the potential risks and impacts of the project and shall be accessible and inclusive. Where feasible and suitable for the project, the grievance mechanism shall utilize existing formal or informal grievance mechanisms, supplemented as needed with project-specific arrangements.

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholders have been identified and negotiations were commenced with these stakeholders both during the ESIA process and later during the RAP preparation, as of 2020. Public authorities, Mukhtars, land owners/users and other stakeholders have been consulted many times for different purposes. Therefore, the stakeholders identified in the region have been informed about the location, components and land requirements of the Project. A summary of previous engagement activities for the Project is given in the Table below.

Table 3-1. Summary of previous engagement activities

Date	Venue	Participants	Scope of Meeting	Outcomes/ feedback/key questions
08.01.2020	Sazköy Village Council	Mukhtar, community members	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Will there be employment opportunities for local people? ➤ Will the Project activities prevent our access to grazing lands? ➤ When the project construction phase will start? ➤ How construction and excavation works will be carried out in project area?
08.01.2020	Aşağıhsaniye Village Council	Mukhtar, community members	General description and information about the project, planned project activities and timeframe,	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ When the project construction phase will start?

Date	Venue	Participants	Scope of Meeting	Outcomes/ feedback/key questions
			land requirements, potential impacts on local communities have been provided to Project-affected parties	
08.01.2020	Derecikören Village Council	Mukhtar, community members	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ What impacts can the Project cause in our settlement?
09.01.2020	Sefercik Quarter-Coffeehouse	Mukhtar, community members	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ When the project construction phase will start? ➤ How construction and excavation works will be carried out in project area?
09.01.2020	Gökçeler Village Council	Mukhtar, community members	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ Will our houses along the road side will be affected by the Project? ➤ How construction and excavation works will be carried out in project area?
09.01.2020	Öteyüz Mukhtars Room	Mukhtar, community members	General description and information	<ul style="list-style-type: none"> ➤ What impacts can the Project cause in our settlement?

Date	Venue	Participants	Scope of Meeting	Outcomes/ feedback/key questions
			about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ When the project construction phase will start? ➤ Have the areas to be expropriated been determined or not?
09.01.2020	District Directorate of Agriculture and Forestry / Village-Coop Çaycuma Office	Agricultural Engineers, personnel of Directorate and Office	General description and scope of the project, stakeholders' opinions, receiving data on agricultural and husbandry activities on affected region	<ul style="list-style-type: none"> ➤ Statistical information about agricultural activities (number of farmers/agricultural lands registered in ÇKS¹, total land sizes by settlements, number of livestock by types, number of beekeepers/bee hives etc. ➤ Potential impacts of the Project on agricultural and husbandry activities of the region ➤ General practices and trends of agriculture and husbandry in the region
03.02.2020	Aşağıhsaniye Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the unit land prices been determined or not? ➤ Is there any chance for a revision on the Project route to not to cause physical displacement of houses?
03.02.2020	Sazköy Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the unit land prices been determined or not? ➤ What will happen to the formal users of treasury lands which were expropriated before? ➤ Will the Project activities prevent our access to grazing lands? ➤ Will there be employment

¹ Farmers Registry System of the Ministry of Agriculture and Forestry

Date	Venue	Participants	Scope of Meeting	Outcomes/ feedback/key questions
				opportunities for local people?
03.02.2020	Filyos Municipality	Mayor and Deputy Mayor of Filyos Municipality	General description and scope of the project, land requirements, potential impacts, stakeholders' opinions	<ul style="list-style-type: none"> ➤ Potential positive/negative impacts of the Project ➤ Feedbacks of Mayor mostly on the positive impacts such as the Project being an important milestone for the development of Filyos Valley Project and contributing to the local economy in terms of employment and opportunities in long term ➤ Feedbacks about the general opinion of people in the region about the development of the Project
04.02.2020	Sefercik Quarter-Mukhtars Room	Mukhtar, PAPs (affected land owners/ shareholders/ users)	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Feedbacks were quite positive since a very small number of lands are affected by the Project and no new questions were raised by PAPs
04.02.2020	Öteyüz Mukhtars Room	Mukhtar, PAPs (affected land owners/ shareholders/ users)	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Feedbacks were quite positive since very small sizes of lands are affected by the Project which have multiple shareholders and mostly not used ➤ No new questions were raised by PAPs
05.02.2020	Gökçeler Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ Will our houses along the road side will be affected by the Project? ➤ How construction and excavation works will be carried out in project area?

Date	Venue	Participants	Scope of Meeting	Outcomes/ feedback/key questions
				➤ Will the road passing from the village be expanded and if so, what will be the impacts to our houses during construction?
30.04.2020 - 08.05.2020	-	All stakeholders	All project documents have been disclosed to PAPs. Disclosures were held via electronic and online channels due to outbreak.	Feedbacks received from disclosure activities have been presented in Table 3-2.

Preliminary consultations conducted prior to this SEP during the ESIA process have been aimed at informing regional public authorities about the Project and receiving their feedback and concerns about the potential impacts of the Project. Besides, separate focus group discussions were conducted with women and elderly people in the affected settlements. Officials of DGoll have also attended the public information meetings.

The important topics raised during the initial engagement activities are summarized here below;

- Have the areas to be expropriated been determined or not?
- Have the unit land prices been determined or not?
- When the project construction phase will start?
- How construction and excavation works will be carried out in project area?
- Will the Project activities prevent our access to grazing lands?
- Will there be employment opportunities for local people?

The clear information covering all concerns of stakeholders has been provided during the initial consultations. Besides, once the Project documents (ESIA, ESMP, RAP and SEP) are finalized, they were disclosed to stakeholders with the aim of informing them about the possible impacts and measures/compensations defined for the Project and receiving their feedback to consider during final revisions.

As the Covid-19 pandemic has coincided with the preparation studies of this documents, DGoll has adopted additional measures during the consultation and disclosure of this document. Document disclosure have been performed between 30 April 2020 and 8 May 2020. As a national lock down is currently in place, electronic copies of the document and additional tools such as presentations and informative videos on the environmental and social impacts of the project, including land-based impacts, have been prepared and disseminated via DGoll's official website, other social media channels and via direct messaging on individual basis for the PAPs. The website view, direct messages sent to PAPs and online feedback forms can be seen in Appendix-4. Official correspondence and electronic

information sharing with stakeholders such as other public institutions has carried on as usual. Official letter sent to institutional stakeholders is given in Appendix-5.

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



DGoll have also communicated with institutional stakeholders during the disclosure process in accordance with the SEP. Opinions were requested from the institutions and organizations with an official correspondence about the disclosed documents of the Project. All national and local institutional stakeholders were sent an official letter by DGoll.

The questions and concerns received by stakeholders during public disclosure process of Project documents is presented in the table below. Feedbacks received from stakeholders are about many different subjects such as expropriation, compensation payments, physical resettlement, impacts on common properties, alternative assessments and environmental impacts. In addition to concerns regarding the environmental impacts of the Project, there are also requests for a change in Project design to eliminate the need for physical resettlement. Questions and concerns were also expressed about the expropriation process, payments and valuation methods. The sections of relevant documents in which these questions and concerns were addressed have been also included in the table. Although the raised issues are addressed in relevant documents, DGoll will provide feedbacks to PAPs in response to their questions and concerns.

Table 3-2. Feedbacks from Document Disclosure

Questions / Concerns	Subject	N	Addressed Section
Which settlements the Project will pass through?	Project route	1	ESIA Section 3.1.1, RAP Section 1.1. and Section 4.2
Will there be tunnels as a Project component and if yes, where will be the locations of these tunnels?	Project components	1	ESIA Section 3.2, RAP Section 1.1. and Section 4.1
When the expropriation process will start?	Expropriation process	1	RAP Section 4.3
The environmental damage caused by the construction of "Filyos Port", which is currently underway, has already negatively affected the life of endemic species and the natural habitat. This railway Project will also cause irreversible impacts on ecosystem since it	Environmental impacts	1	ESIA Section 4.3, 4.6, 5.4, 5.7

Questions / Concerns	Subject	N	Addressed Section
will be constructed on the remaining lands which were limitedly available for endemic species.			
The Project should have been designed on the lands which were already expropriated for Industrial and Free Zones. This would also decrease the expropriation costs and necessity for resettlement.	Physical resettlement / Alternative Assessment	1	ESIA Section 6
I request that the route be changed so that the Project does not affect my home and land.	Physical resettlement / Alternative Assessment	1	ESIA Section 6
Mains water wells located in the Project route is currently used by the port construction site and the villagers of Sazköy. Will these wells continue to be used?	Common property impacts	1	ESIA Section 5.9.2.4 and 5.5
We are currently residing and engaged in livestock activities on the lands that were expropriated before but we are paying annual rent to the state. We have received the expropriation payment before, will we receive any expropriation fee for the second time?	Resettlement / Compensation	1	RAP Section 7.2
Do we have any shares in the parcels to be expropriated on the project route?	Compensation / Expropriation	2	RAP Appendix 1
Does our hazelnut garden remain on the Project route?	Compensation / Expropriation	1	RAP Appendix 1
We have 2,5 acres of lands on the project route and we don't want it to be expropriated as the expropriation price will be low.	Valuation / Expropriation	1	RAP Section 7.2
The highway and railway components of the Project passes through our village. Are there any houses affected and to be resettled for the Project? If yes, how many and belongs to whom?	Physical resettlement	1	RAP Section 6.1
How are the expropriation payments calculated?	Valuation / Expropriation	1	RAP Section 4.6 and 7.2
Has the EIA report been positive?	Impact assessment of the Project	1	ESIA Section 2.3

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4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

It is required to identify the stakeholders at the first stage of the project to be able to equally and justly realize the stakeholder participation. It will ensure the formation of an effective SEP to correctly analyze all the stakeholders of the project including the people and groups that are either related/have interest in the project, or directly and indirectly affected, thanks to this determination.

Stakeholder identification is a key step in managing the overall stakeholder engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process.



The stakeholders that expected to be either related/have interest or directly/indirectly affected by the project are listed below and additional stakeholders will be recorded throughout the life of the Project;

- National and local state institutions and organizations (The Ministry of Transport and Infrastructure, The Ministry of Industry and Technology, The Ministry of Agriculture and Forestry, The Ministry of Culture and Tourism, T.C.D.D (Turkish State Railways), Çaycuma District Directorate of Agriculture and Forestry, Çaycuma-Filyos Municipalities etc.)
- Settlements close to the Project locations (Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Sefercik and Öteyüz)
- PAPs include land owners/users that may formally and/or informally use private/communal/state/treasury lands and that may formally and/or informally own immovable assets on affected lands
- Herders and other users of project-affected pasture and forestry lands
- PAPs including non-organized groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, women, people whose lands will be expropriated second time etc.),
- Interest groups, such as universities and their foundations, cooperatives, local business establishments, business associations, chambers of commerce and others;
 - Tosyalı Holding Company, which operates the Filyos Industrial Zone
 - Village-Cooperative Caycuma office
- Project and contractors' employees

The detailed list of stakeholders is presented in Appendix-1, but the persons or groups not listed here will be able to communicate with DGoll and add their information to this list.

4.1. Project-Affected Parties

This includes the people and groups that are expected to be directly or indirectly affected by the Project in terms of living standards and livelihood/income sources. Local communities living in the settlements close to the Project locations (Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Sefercik and Öteyüz) may be directly or indirectly affected by the Project

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aspects such as construction impacts (noise, emission, vibration etc.) affecting their living standards. PAPs including land owners/users that may formally and/or informally use private/communal/state/treasury lands and that may formally and/or informally own immovable assets on affected lands, herders and other users of project-affected pasture and forestry lands are expected to directly affected by the Project' land acquisition affecting their livelihood activities/income sources. 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.

4.1.1. Disadvantaged/Vulnerable Individuals or Groups

Vulnerable individuals or groups under the category of “project-affected parties” that may be directly/indirectly affected by the Project are analyzed as following;

- Physically or mentally disabled people
- People with chronic diseases
- Households using public land owned by treasury
- Elderly people over the age of 65 who live alone and need care
- Women, in particular female-headed households
- Persons whose land has been already affected by other infrastructure or investment projects (highway, railway, oil or natural gas pipelines etc.) in the region and whose lands will be affected within the scope of this Project.

Focus group discussions were conducted with women and elderly groups in the settlements to receive their feedback on the Project and to understand their concerns on the impacts. The presence of these vulnerable groups among project-affected parties has been also analysed in detail during RAP studies. Thus, LARAP document provides a detailed assessment of above mentioned vulnerable groups in the project area.

4.2. Other Interested Parties

Other individuals or groups that may have an interest in the project are identified as “other interested parties”. National and local state institutions and organizations (The Ministry of Transport and Infrastructure, The Ministry of Agriculture and Forestry, Çaycuma District Directorate of Agriculture and Forestry, Çaycuma Municipality, etc.), interest groups, such as; Tosyalı Holding Company, which operates the Filyos Industrial Zone, Village-Cooperative Çaycuma office etc. are considered as other interested parties of the Project.



4.3. Stakeholder Matrix

Stakeholders need to be identified at the initial stage of the project in order to be able to achieve stakeholder participation equally and fairly. Also, it is important to determine which consultation strategy is going to be implemented for each affected groups (directly or indirectly) during the construction and operation phases. Table 4.1.1 summarizes these details regarding the consulting and informing process.

Table 4-1. Stakeholder Matrix

Stakeholder Groups	Project-affected or Other Interested Party	Information to be Shared	Engagement Method
National and local state institutions and organizations (The Ministry of Transport and Infrastructure, The Ministry of Agriculture and Forestry, The Ministry of Culture and Tourism, Çaycuma District Directorate of Agriculture and Forestry, Çaycuma-Filyos Municipalities	Other interested party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Current developments related to the project 	<ul style="list-style-type: none"> • Public Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism • Free hotline
T.C.D.D (Turkish State Railways)	Other interested party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Current developments related to the project • As the Project will be operated by T.C.D.D, DGoll should consult with them about the requirements of approved documents such as establishing an organizational structure and E&S management system. 	<ul style="list-style-type: none"> • Public Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism • Free hotline
The Ministry of Industry and Technology	Other interested party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Current developments related to the project • The Ministry should be consulted on the allocation of parcels affected within the Industrial Zone for the Project 	<ul style="list-style-type: none"> • Public Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism • Free hotline
Interest groups such as Tosyalı Holding Company, which operates the Filyos Industrial Zone, Village-Coop Caycuma Office	Other interested party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Current developments related to the project 	<ul style="list-style-type: none"> • Public Participation Meeting • Consultation meetings • In-depth interviews • Project Brochures • Presentations • Grievance Mechanism • Free hotline
Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Sefercik and Öteyüz settlements	Project-affected party	<ul style="list-style-type: none"> • Non-technical summary of the project and Stakeholder Engagement Plan • Information about the land acquisition process • Current developments related to the project 	<ul style="list-style-type: none"> • Consultation meetings • Socio-economic surveys • Leaflet and posters to be hanged at public locations (cafe, Mukhtars

Stakeholder Groups	Project-affected or Other Interested Party	Information to be Shared	Engagement Method
		<ul style="list-style-type: none"> Grievance Mechanism Procedure 	<p>building, town hall etc.)</p> <ul style="list-style-type: none"> Project brochures Presentations Grievance Mechanism Free hotline
PAPs include land owners and users that may formally and/or informally use private/communal/state/treasury land and that may formally and/or informally own immovable assets on affected lands	Project-affected party	<ul style="list-style-type: none"> Information about the land acquisition process and its impacts and entitlements Grievance Mechanism Procedure Current developments related to the project Non-technical summary of the project 	<ul style="list-style-type: none"> Consultation meetings Socio-economic surveys Project brochures Presentations Grievance Mechanism Free hotline
PAPs including non-organized groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, women, people whose lands will be expropriated second time etc.)	Project-affected party	<ul style="list-style-type: none"> Information about the land acquisition process and its impacts and entitlements Grievance Mechanism Procedure Current developments related to the project Non-technical summary of the project 	<ul style="list-style-type: none"> Consultation meetings Socio-economic surveys Focus group discussions Project brochures Presentations Grievance Mechanism Free hotline
Herders and other users of project-affected pasture and forestry lands	Project-affected party	<ul style="list-style-type: none"> Non-technical summary of the project Grievance Mechanism Procedure Current developments related to the project 	<ul style="list-style-type: none"> Consultation meetings Focus group discussions Project brochures Presentations Grievance Mechanism Free hotline
Project and contractors' employees	Project-affected party	<ul style="list-style-type: none"> Grievance Mechanism Procedure for project and contractors' employees Current developments related to the project Code of Conduct for workers 	<ul style="list-style-type: none"> Toolbox meetings Leaflet and posters to be hanged at working areas Presentations Grievance Mechanism Free hotline

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5. STAKEHOLDER ENGAGEMENT PROGRAM AND METHODS

Stakeholder engagement is a continuous process that began prior to the development of this SEP and will continue through the life of the Project. DGoll will be in active communication with the stakeholders determined throughout the life of the project. In particular, DGoll will seek feedback from stakeholders on the environmental and social performance of the project, and the implementation of the mitigation measures determined. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, DGoll will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated.

To the extent possible, DGoll will refrain from sending and distributing printed material until the outbreak is over. As per the requirements of ESS10 and the consultation requirements of ESS5, DGoll will repeat the consultation process by conducting regular consultation meetings once the lock down is no longer at force and before civil works can start.

The following methods and materials will be used within the scope of the engagement starting from the scoping stage of the project until the operation and closure stages.

Consultation Meetings: Once the outbreak conditions are over, consultation meetings will be held regularly with all stakeholders who are affected by/interested in the Project at least in quarterly periods, detailed information on the project will be provided and questions and opinions of the stakeholders will be evaluated. Updated information on a regular basis at each stage of the Project, and information on current developments will be provided and feedback of stakeholders will be received and recorded.

Consultation meetings will be organized to inform the local communities about the possible impacts of the project to ensure that they are aware of the content of the project and how the planned activities will affect those residing in the area. Informative materials will be distributed and information about the proposed land expropriations will be provided to formal and informal owners/users of the affected lands in advance to enable them to consider the possible impacts on their livelihood and plan their livelihood activities accordingly. Consultation meetings will also be held with the households to be physically resettled to inform them about current developments of the Project, resettlement/relocation process and to address their opinions and expectations during these processes.

In-depth interviews: In-depth interviewing is a qualitative research technique that involves conducting intensive individual interviews with a small number of respondents to explore their perspectives on a particular idea, program, or situation. In this case, in-depth interviews will be conducted with stakeholders such as national and local state institutions/organizations, cooperatives etc. at least in quarterly periods to analyze the potential impacts of the Project on their management and businesses as well as to consider their expectations/ recommendations through planning process.

Focus group discussions: Focus group discussion (FGD) will be conducted in semi-annually periods, which provides to engage specific sections of the community that might require special attention in consultation, e.g. women/women headed households, elderly, disabled people and other identified vulnerable groups. FGD is an effective way to collect together people from similar experiences to discuss a specific interest related with the Project.

Presentations: Visual material will be used in public participation meetings and consultation meetings in quarterly periods. Presentations will be made which will be summaries of written documents.

Project Brochure: In the project introduction brochures that will be presented to the stakeholders at the initial stage, general information about the Project and the ESIA process as well as information about grievance mechanism and liaison channels will be provided.

Grievance Mechanism: The grievance mechanism will be open to all stakeholders for the duration of the project, will include registering complaints, taking actions for resolution and closing the complaints by proving necessary information. The information about GRM communication channels will be provided to each settlement (especially on public places, coffeehouses, Mukhtars office etc.) at the initial stage of the Project and will be updated when necessary.

Phone Line: There will be a phone line that all stakeholders can use to raise their concerns and complaints. This method is important in that it is fast and that it is possible to solve the urgent problems of the stakeholders.

Corporate website: The corporate website provides announcements, Project documents, reports and contact details for requesting more information.

Which stakeholder engagement activity is to be performed at which phase of the project and which methods to use are detailed in the tables below.

Table 5-1. Stakeholder Engagement during Scoping and Baseline Data Collection

Engagement Method	Location (if applicable)	Stakeholder Groups
Consultation Meetings	Project-affected settlements	Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Öteyüz and Sefercik settlements
In-depth Interviews	Provinces, districts and settlements within the boundaries of Project	National and local state institutions and organizations, cooperatives and other interest groups
Socio-economic surveys	Project-affected settlements	Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Öteyüz and Sefercik settlements, all PAPs including households to be physically displaced
Focus group discussions	Project-affected settlements	PAPs (vulnerable groups i.e. elderly, people with disabilities, women, etc.)
Project Brochures	Districts and settlements within the boundaries of Project	All
Grievance Mechanism	Not applicable	All
Phone Line	Not applicable	All
Corporate website	Not applicable	All

Table 5-2. Stakeholder Engagement during Construction and Operation



Engagement Method	Location (if applicable)	Stakeholder Groups	Frequency
Consultation Meetings	Project-affected settlements	Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Öteyüz and Sefercik settlements, all PAPs and affected households	Quarterly
In-depth Interviews	Provinces, districts and settlements within the boundaries of Project	National and local state institutions and organizations, cooperatives and other interest groups	Quarterly
Focus group discussions	Project-affected settlements	PAPs (vulnerable groups i.e. elderly, people with disabilities, women, etc.)	Semi-annually
Press releases	Not applicable	Media	At the important milestones of the Project
Presentations	Districts and settlements within the boundaries of Project area	All	Quarterly
Toolbox Meetings	Camp sites or working areas	Project and contractors' employees	Monthly
Grievance Mechanism	Focal point at construction camp site	All	All time
Phone Line	Not applicable	All	All time
Corporate website	Not applicable	All	All time

Table 5-3. Stakeholder Engagement during Decommissioning and Closure

Engagement Method	Location (if applicable)	Stakeholder Groups
Grievance Mechanism	Not applicable	All
Free Hotline	Not applicable	All
Corporate website	Not applicable	All

This SEP prepared for Filyos Railway and other ESF instruments (ESIAs, ESMPs, RAPs, LMP) were disclosed by DGII on 29 April 2020 and will be consulted. Due to COVID-19 pandemic and guidance by the government on social distancing and self-isolation, it will not be advisable and possible to carry out face-to-face consultation meetings. DGII will prepare video presentation about the project which will be shared with stakeholders, including PAPs via email, social media and different messaging channels and applications. DGII will establish an online form and phone feedback mechanism for the stakeholders to provide feedback about the project. This feedback will be included in the finalized ESF documents which will be disclosed before project negotiations.

Due to inconclusive scientific evidence about the retention of coronavirus on paper surfaces, and hesitation of local people to receive snail mail during pandemic, the project will not

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prepare project brochures for the purposes of consultations during COVID-19 pandemic. After the COVID-19 situation improves in Turkey and government eases social distancing guidelines, DGoll will carry out an additional round on local consultations with PAPs, including those affected by land acquisition and displacement. Based on feedback received from the stakeholders, SEPs, ESIA, ESMPs, and RPs will be revised and re-disclosed.

6. ROLES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1. Implementation Arrangements

DGoll PIU has been established and as for now dedicated staff responsible for environment, land acquisition, procurement and financial management have been assigned. PIU will be the main responsible together with Contractors' for coordinating stakeholder engagement activities as specified in this Plan. Collection of complaints, questions and feedbacks will be directly under the responsibility of PIU and Contractors' Social Teams. Detailed roles and responsibilities of team for the social management of the Project are given in table below.

Table 6-1. Roles and Responsibilities for Social Management

Staff		Responsibility
DGoll PIU	Project Manager	<ul style="list-style-type: none"> • Incorporate all stakeholder engagement activities into the overall environmental and social management systems; Develop an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members • Expedites, monitors, follows up social team for proper implementation of processes related to grievance mechanism and stakeholder engagement issues • Coordinates with parties for proper implementation of processes related to grievance mechanism and stakeholder engagement issues
	Social Specialist	<ul style="list-style-type: none"> • Ensure stakeholder engagement is understood by all DGoll staff members, contractors and consultants; • Production of all work in compliance with quality, safety, budget and schedule requirements as well as company procedures and contractual terms • Ensuring the successful delivery of all defined documentation • Manage Public Participation Meetings and other events related to public disclosure of information; • Follows up and is informed about disclosure activities carried out within the scope of the SEP • Support to other staff that may have interaction with stakeholders, especially if other staff members become aware of problems with local communities or other stakeholder groups. • Coordinating interface and reporting to/from World Bank in relation to implementation of SEP. • Meets with Lenders' project safeguards and supervision teams and responds to queries as necessary
Site (DGoll)	Project Manager	<ul style="list-style-type: none"> ▪ Identification of problems, issues or cases of hardship resulting from the Project activities, and to develop appropriate corrective actions, or refer them to the management team if required. ▪ Ensuring that proper approaches and tools are being used by relevant parties to conduct site activities in compliance with Project requirements. ▪ Monitors activities of the construction contract and administers payments made for overspill and additional land rentals

Staff		Responsibility
		<ul style="list-style-type: none"> ▪ Meets with Lenders' project safeguards and supervision teams and respond to queries as necessary
	Community Liaison Officer	<ul style="list-style-type: none"> • Ensures that the Contractor informs the community about construction activities and other Project related issues • Implements processes related to grievance mechanism and stakeholder engagement issues • Ensuring that necessary mitigation measures/actions are implemented for the implementation of SEP • Takes actions to resolve Project induced grievances in coordination with other Project units. • Reports to DGoll PIU about community issues on a daily basis • Takes proper actions according to the information submitted from DGoll PIU •
Site (Environmental and Social Monitoring Consultant)	Stakeholder Engagement Specialist	<ul style="list-style-type: none"> ▪ Reviews the SEP document in order to re-identification of stakeholders indirectly or directly affected by and/or interested in the project and to follow the implementation of methods, materials, their timing and participation levels determined in SEP ▪ Holds interviews with DGoll PIU, and others involved in stakeholder engagement process to review progress and identify critical issues ▪ Consults with affected households and with community leaders through brief questionnaires to ascertain their feedback on stakeholder engagement performance of the Project. Also interacts with various stakeholders to hear their views on SEP implementation ▪ Reviews grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with actions ▪ Meets with Lenders' project safeguards and supervision teams and responds to queries as necessary ▪ Monitors and reports on progress made with regards to commitments defined in SEP ▪ Performs any other activities required to realize the objectives of SEP implementation ▪
Site (Contractor)	Community Liaison Officer	<ul style="list-style-type: none"> • Implements and improves Contractor's social policy • Ensures necessary resources for proper remedial actions • Follows up of the grievances and informing DGoll PIU about the resolution process accordingly • Carries out day-to-day liaison activities • Consults regularly with the Project affected communities about grievance mechanism, entitlements, construction works and schedule, community safety, compensation of economic losses, RAP Fund management • Acts as the principal point of contact with affected communities and other stakeholders • Records of grievances and any engagement activities performed • Reports any grievances and any engagement activities performed to DGoll PIU.

DGoll will be in frequent coordination with its Consultant and Contractor to ensure that stakeholder engagement program is understood and adopted. Contractor will be reporting

to DGoll as per the terms of individual contracts. DGoll will ensure the quality and consistency of the reports and on-site implementation activities.

6.2. Estimated Budget

The budget calculated by the estimated costs of items required for the implementation of SEP is presented below.

Table 6-2. Estimated Budget for SEP Implementation

Budget Items	Estimated Total Budget	Resource
Assignment of personnel (1 Social Specialist in Headquarters)	160,000 \$	DGoll
Assignment of personnel (1 Community Liaison Officer at site)	85,000 \$	DGoll
Procurement of consultancy services (Stakeholder Management Specialist)	30,000 \$	Consultant
Costs of written material such as brochures, leaflets etc.	5,000 \$	DGoll
Expenses of assigned personnel such as travel, communication, fuel, equipment, stationery, extras etc.	30,000 \$	DGoll
Contingency (3%)	10,000 \$	DGoll
TOTAL	320,000 \$	



7. MONITORING AND REPORTING

DGoll will register and report the feedback they receive from communities, local authorities, landowners, other companies, NGOs, media, academic institutions and other interest groups on a systematic basis through an effective consultation and grievance mechanism which is developed and will be used by the Company and its contractors throughout the Project lifetime. Monitoring of the grievances received will be performed by means of grievance monitoring table.

Quarterly monitoring reports in which a summary of all stakeholder engagement activities, including the monitoring of grievances will be prepared and provided by DGoll to World Bank.

DGoll will work with a consultant in order to implement social and environmental monitoring activities. This Consultant will monitor and report to DGoll whether the social and environmental issues stated in related documents are implemented throughout Project lifetime.

Throughout the Project life, DGoll will maintain communication channels with relevant stakeholders as identified. Any additional stakeholders identified during the life of the Project will also be added to the stakeholder list and communication with them will be

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initiated. In case of significant changes or updates regarding the project, environmental and social issues will continue to be addressed and reported to the stakeholders. Improvements, upgrades and all environmental and social issues will be timely communicated via the methods outlined in Section 4 of this SEP.

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.

8. GRIEVANCE REDRESS MECHANISM

8.1. Purpose and Scope



Key elements of a grievance mechanism include:

- Clear instructions on how grievances are submitted and handled after submission, including a minimum period that a stakeholder must wait to receive a reply; and
- Presenting alternatives tools for submitting a grievance in person to a staff member if a stakeholder is not able to or comfortable with submitting a grievance in writing.

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

CIMER system will be used for receiving and responding complaints of the Project affected or other interested parties as well as a separate Project-level GRM. According to the Right to Information Act, each person has the right to obtain information within the framework of the principles and methods established by the written rules. This application can be made in writing using the Right of Petition, or online at <https://www.icisleri.gov.tr/bilgi-edinme>. DGoll responds to the applicants within 15 days by evaluating the application in accordance with the law. However, access to the information or document is provided within 30 working days in cases where the requested information or document is obtained from another unit in DGoll, the opinion of another institution or organization 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 before the end of the 15 business days. PIU is assigned to be responsible for this work in DGoll. Responses to applications are notified in writing, electronically or by fax to the applicant. If necessary, they are also be informed by phone.

CIMER system enables stakeholders to communicate directly with the DGoll, but a separate system will be established for the project in which the stakeholders can receive their responses locally and communicate their complaints. This local grievance system will be

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established within the body of DGoll, implemented and followed by both DGoll PIU and Constructor during construction, operation and decommissioning/closure phases, which will be more easily accessible for stakeholders and will encourage them to voice their complaints.

8.2. Procedure and Responsibilities

Recording and follow up of grievances (including environmental issues) will be the primary responsibilities of the DGoll PIU. DGoll PIU will have personnel assigned for the grievance management process both on site and on Headquarters. As defined in Roles and Responsibilities (Section 6), Social Specialist on Headquarters and Community Liaison Officer (CLO) on site will be primarily responsible for grievance management as well as Contractors' social staff. DGoll will regulate the contractual agreements with Contractor to ensure that they have a CLO on site who will be responsible for recording and follow up of grievances on site office. These assigned staff will follow the Grievance Redress Mechanism established to record and resolve all complaints from the stakeholders and follow up corrective actions taken. Contact information will be provided via Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for stakeholders to vocalize their grievances formally include:

- Telephone (Stakeholders can call DGoll on (0312) 203 10 00 and request to speak to contact person: Güzide SAYIN [or directly call on 0312 203 17 96] or Ali KETENCİOĞLU [or directly call on 0312 203 17 98])
- Email (Grievances can be sent to guzide.sayin@uab.gov.tr or ali.ketencioglu@uab.gov.tr)
- Face to face (Stakeholders can voice their grievance to assigned personnel of DGoll at local office)
- Complaint register form (CRF) (Stakeholders can fill the forms that will be distributed to them in advance to voice their grievances) (see App.2)
- Online application (Stakeholders can fill the forms online at the <https://aygm.uab.gov.tr/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gelistirme-projesi>)

The steps to be followed during the grievance management will be as follows;

8.2.1. Receiving & Registering of Grievance

- All Grievances received by all level of Project Staff; DGoll, Contractors and subcontractors of Project via hotline, e-mail, in person or other media, are registered by using Complaint Register Form (CRF) and a hard copy of the form is provided to Complainant. The completed form is delivered to PIU within the same Business Day. Other hard copies of the CRF are distributed by PIU to relevant disciplines, if needed.
- If the CRF cannot be filled out, following basic information is recorded and provided to PIU by e-mail or by an acceptable correspondence:
 - Name and surname of the Complainant (complainants also have the opportunity of anonymous grievance lodging);
 - Subject of the Grievance;
 - Location of the Grievance;

- Contact details (phone/mobile number, address, e-mail etc.);
- Organization name (if related)
- Date & time
- PIU completes the CRF according to given information and registers the complaint.
- All corrective actions suggested by Complainant are taken under registration via CRF.
- Grievance Monitoring Table is filled out by PIU according to the received information.

8.2.2. Assessment of the Grievance

- All Grievances are reviewed to be classified whether they are genuine and related to Project activities or not. If the issues/disputes raised are not related to Project, guidance is provided to the Complainant to contact relevant party. Eligible complaints are responded according to Project social and environmental requirements which are identified in ESMP and ESIA.
- All grievances received through direct phone calls, e-mails and face-to-face meetings/communications are taken under registration and PIU gets contact with the Complaint within two (2) Business Days following registration in order to explain the Project response process to Grievance.
- PIU has ten (10) Business Days to investigate and respond the Complaints. If the case requires a more complex investigation, updated information is provided to the Complainant explaining the actions required to resolve Grievance, and the likely timeline.
- Responses aligning with the Project social mitigation measures and compensation items are defined beforehand according the Project standards.

8.2.3. Resolving the Grievance



- Necessary corrective actions shall satisfy the Complainant.
- All parties get an agreement on the corrective actions during solution process.
- DGoll PIU aims to solve each complaint within thirty (30) Business Days after response, and this period is subject to extend upon written consent of Head of Department.
- When the Complainants are not satisfied with the decision of DGoll and/or Contractors on their complaints, they may apply to court.

8.2.4. Close Out of the Grievance

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 DGoll PIU and the complainant.

8.3. Workers Grievance Mechanism

DGoll aims to establish the process and responsibilities for handling and monitoring of grievances received from workers including sub-contractor workers. DGoll commits to comply with below mentioned objectives:

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- To enable a mechanism for all workers including sub-contractors' workers to raise their views, concerns and complaints regarding working conditions
- To ensure that the repetition of complaints related to the same issues will be prevented.
- To have an active and transparent engagement with workers aiming for solving concerns at an early stage of dispute

DGoll and its' Contractor will implement the Workers Grievance Mechanism to provide opportunity for workers to raise their concerns and complaints. Information on how to make grievance will be provided to workers during induction training and request, suggestion and complaint forms will be provided in the areas where workers use in the construction camp like social units and dining area. A grievance register will be used to document all employee grievances, corrective actions and outcomes. All employee grievances will be registered to this register which will be used to record, track, report and evaluate all grievances including third parties, employees and sub-contractor workers and responses.

HR officer at site will hear any complaints made by the workers and sub-contractor workers; take action in co-operation with the relevant departments to resolve them and cooperate with the Social Department to register the complaint in the grievance log. Workers will be provided request, concern and complaint form and a drop box where filled forms can be left; in the areas where employees use in the construction camp like social units and dining area. Social Department will record the date and time, source, location and nature of each request, suggestion or complaint in grievance register when received from HR officers.

APPENDICES

APPENDIX-1 STAKEHOLDER LIST

National state institutions and organizations	<ul style="list-style-type: none"> - Ministry of Transport and Infrastructure - Ministry of Culture and Tourism - Ministry of Agriculture and Forestry - Ministry of Industry and Technology - T.C.D.D (Turkish State Railways)
Local state institutions and organizations	<ul style="list-style-type: none"> - Çaycuma Municipality - Filyos Municipality - Çaycuma District Directorate of Agriculture and Forestry - Provincial Directorates of Culture and Tourism
Interest groups, such as universities and their foundations, cooperatives, local business establishments, business associations, chambers of commerce and others	<ul style="list-style-type: none"> - Tosyalı Holding Company, which operates the Filyos Industrial Zone - Çaycuma Agricultural Credit Cooperative No. 2958 - Köy-Koop Çaycuma Şubesi
Settlements close to the Project locations	<ul style="list-style-type: none"> - Sazköy, Gökçeler, Derecikören, Aşağıhsaniye, Sefercik and Öteyüz
Project-affected people	<ul style="list-style-type: none"> - Land owners and users that may formally and/or informally use private/communal/state/treasury land and that may formally and/or informally own immovable assets on affected lands - Non-organized groups with particular areas of interest or that may be vulnerable (i.e., elderly, people with disabilities, women, people whose lands are expropriated second time, etc.) - Herders and other users of project-affected pasture and forestry lands - Project and contractors' employees

APPENDIX-2 COMPLAINT REGISTER FORM

FILYOS PORT/INDUSTRIAL ZONE CONNECTIONS PROJECT ŞİKÂYET KAYIT FORMU / COMPLAINT REGISTER FORM		
Şikâyetin Alındığı Yer / Location of Complaints Received		Tarih / Date
Alan Yetkilisinin Adı / Name of Person In charge		Şikâyet Kayıt No / Complaint Register Number
Şikâyete Konu Alanın Koordinatları / Coordinates of the area subject to complaint		
Arazi parsel numarası (Şikâyete 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 geridönüş şekli 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		Şikâyetin Geliş Yolu / Form of Complaint:
TC Kimlik No/ Identification Number		<input type="checkbox"/> Telefon- Ücretsiz hat / Phone -Free phone line
Telefon / E-posta Telephone / E-mail		<input type="checkbox"/> Halk Toplantısı / Community meeting
Köy- İlçe- İl / Village - District - Province		<input type="checkbox"/> Dilekçe / Petition
ŞİKAYET DETAYLARI / DETAILS OF COMPLAINT		
Şikayet Konusu / Complaint		
Şikayet sahibi tarafından talep edilen çözüm / Solution reque ted by the Comp ainant		
Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası / İmzası / Name Surname and Signature of the Registerer	Şikâyet Sahibinin Ad Soyad ve Name Surname and Signature of	

APPENDIX-3 DETAILS OF ENGAGEMENT ACTIVITIES

Date	Venue	Participants	Number of Participants	Distribution of participants by gender		Scope of Meeting	Outcomes/ feedback/key questions
				Female	Male		
08.01.2020	Sazköy Village Council	Mukhtar, community members	14	2	12	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Will there be employment opportunities for local people? ➤ Will the Project activities prevent our access to grazing lands? ➤ When the project construction phase will start? ➤ How construction and excavation works will be carried out in project area?
08.01.2020	Aşağıhsaniye Village Council	Mukhtar, community members	6	-	6	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ When the project construction phase will start?
08.01.2020	Derecikören Village Council	Mukhtar, community members	9	1	8	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ What impacts can the Project cause in our settlement?
09.01.2020			7	Female	Male	General description and information about the project,	

Date	Venue	Participants	Number of Participants	Distribution of participants by gender		Scope of Meeting	Outcomes/ feedback/key questions
				Female	Male		
	Sefercik Quarter-Coffeehouse	Mukhtar, community members		2	5	planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ When the project construction phase will start? ➤ How construction and excavation works will be carried out in project area?
09.01.2020	Gökçeler Village Council	Mukhtar, community members	7	Female	Male	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ Will our houses along the road side will be affected by the Project? ➤ How construction and excavation works will be carried out in project area?
				3	4		
09.01.2020	Öteyüz Mukhtars Room	Mukhtar, community members	5	Female	Male	General description and information about the project, planned project activities and timeframe, land requirements, potential impacts on local communities have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ What impacts can the Project cause in our settlement? ➤ When the project construction phase will start? ➤ Have the areas to be expropriated been determined or not?
				2	3		
09.01.2020	District Directorate of Agriculture and Forestry / Village-	Agricultural Engineers, personnel of Directorate and Office	4	-	-	General description and scope of the project, stakeholders' opinions, receiving data on agricultural and husbandry activities on affected region	<ul style="list-style-type: none"> ➤ Statistical information about agricultural activities (number of farmers/agricultural lands)

Date	Venue	Participants	Number of Participants	Distribution of participants by gender		Scope of Meeting	Outcomes/ feedback/key questions
				Female	Male		
	Coop Çaycuma Office						<p>registered in ÇKS², total land sizes by settlements, number of livestock by types, number of beekeepers/bee-hives etc.</p> <ul style="list-style-type: none"> ➤ Potential impacts of the Project on agricultural and husbandry activities of the region ➤ General practices and trends of agriculture and husbandry in the region
03.02.2020	Aşağıhsaniye Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	7	4	3	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the unit land prices been determined or not? ➤ Is there any chance for a revision on the Project route to not to cause physical displacement of houses?
03.02.2020	Sazköy Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	35	9	26	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the unit land prices been determined or not? ➤ What will happen to the formal users of treasury lands which were expropriated before? ➤ Will the Project activities prevent our access to grazing lands? ➤ Will there be employment opportunities for local people?
03.02.2020	Filyos Municipality	Mayor and Deputy Mayor of	2	-	-	General description and scope of the project, land	<ul style="list-style-type: none"> ➤ Potential positive/negative impacts of the Project

² Farmers Registry System of the Ministry of Agriculture and Forestry

Date	Venue	Participants	Number of Participants	Distribution of participants by gender		Scope of Meeting	Outcomes/ feedback/key questions
				Female	Male		
		Filyos Municipality				requirements, potential impacts, stakeholders' opinions	<ul style="list-style-type: none"> ➤ Feedbacks of Mayor mostly on the positive impacts such as the Project being an important milestone for the development of Filyos Valley Project and contributing to the local economy in terms of employment and opportunities in long term ➤ Feedbacks about the general opinion of people in the region about the development of the Project
04.02.2020	Sefercik Quarter-Mukhtars Room	Mukhtar, PAPs (affected land owners/ shareholders/ users)	17	Female	Male	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Feedbacks were quite positive since a very small number of lands are affected by the Project and no new questions were raised by PAPs
				7	10		
04.02.2020	Öteyüz Mukhtars Room	Mukhtar, PAPs (affected land owners/ shareholders/ users)	21	Female	Male	Detailed information about land requirements of the Project, affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Feedbacks were quite positive since very small sizes of lands are affected by the Project which have multiple shareholders and mostly not used ➤ No new questions were raised by PAPs
				5	16		
05.02.2020		Mukhtar, PAPs (affected land	38	Female	Male	Detailed information about land requirements of the Project,	

Date	Venue	Participants	Number of Participants	Distribution of participants by gender		Scope of Meeting	Outcomes/ feedback/key questions
	Gökçeler Village Council	owners/ shareholders/ users)		13	25	affected assets/immovable have been provided to Project-affected parties	<ul style="list-style-type: none"> ➤ Have the areas to be expropriated been determined or not? ➤ Will our houses along the road side will be affected by the Project? ➤ How construction and excavation works will be carried out in project area? ➤ Will the road passing from the village be expanded and if so, what will be the impacts to our houses during construction?

APPENDIX-4 PUBLIC DISCLOSURE MATERIALS

Views from the official website of DGoll:

Dünya Bankası Türkiye'de Demiryolu Lojistiğini Geliştirme Projesi

Proje Adı: Türkiye'de Demiryolu Lojistiğini Geliştirme Projesi (Filyos Limanı ve Sanayi Bölgesi Demiryolu Bağlantısı, Çukurova Bölgesi ve İskenderun Körfezi Demiryolu Bağlantısı Yapım İşleri)

Proje Amacı:
Türkiye'de Demiryolu Lojistiğini Geliştirme (Turkey-Rail Logistics Improvement Project: P170532) Projesi; iltisak hatlarını artırarak, lojistik merkezlerinin operasyonel verimliliğini yükselterek ve kurumsal kapasiteyi güçlendirerek, Türkiye'deki demiryolu yük taşımacılığı etkinliğini geliştirmeyi hedeflemektedir.

Proje Bileşenleri:
Proje üç ana bileşen etrafında geliştirilmiştir.
Bileşen I- Stratejik demiryolu iltisak hat inşası: Bu bileşen, Çukurova Bölgesi ve İskenderun Körfezi demiryolu bağlantısı ile Filyos Limanı ve Sanayi Bölgesi demiryolu bağlantısının Yapım işlerinin yanı sıra 12 potansiyel iltisak hattı listesinden seçilecek işlerin de yapımını içermektedir.



Projelere Ait Çevresel ve Sosyal Kapsamdaki Dokümanlar:

 Çevresel ve Sosyal Taahhüt Planı - TR	
 Environment and Social Commitment Plan - EN	
 İşgücü Yönetim Prosedürü - TR	
 Labor Management Procedures - EN	

FİLYOS Dokümanlar

- + ESIA
- + ESMP
- + RAP
- + SEP

Introductory Video:



Online Feedback Form:

İletişim

"TÜRKİYE'DE DEMİRYOLU LOJİSTİĞİNİ GELİŞTİRME (Turkey-Rail Logistics Improvement Project: P170532) PROJESİ" Filyos Limanı ve Sanayi Bölgesi Demiryolu Bağlantısı, Çukurova Bölgesi ve İskenderun Körfezi Demiryolu Bağlantısı Yapım İşleri GÖRÜŞ ÖNERİ VE ŞİKAYET FORMU

Bu form ile Türkiye'de Demiryolu Lojistiğini Geliştirme Projesi sayfalarımıza ilişkin görüş, öneri ve şikayetlerinizi iletebilirsiniz. (Formun tamamını doldurunuz. Formu isim vermeden, anonim olarak da doldurabilir ancak soru, öneri ya da şikayetinize ilişkin geri bildirim sağlanabilmesi için e-posta adresi bölümü zorunlu olarak doldurulması gereken alanlardan biridir.)

Ad Soyad



E-posta

Mesaj

Gönder

Proje süresince paydaşların her türlü bilgi alma talebi ve şikayetlerini dile getirebilecekleri bir Şikayet Mekanizması kurulmuştur. Bu mekanizma aşağıdaki kanallar yoluyla paydaşlara açık olacaktır:

- ✓ Telefon: (0312) 203 10 00 (santral) – İrtibat sorumluları: Güzide SAYIN (0312 203 17 96) - Ali KETENCİOĞLU (0312 203 17 98)
- ✓ E-posta: guzide.sayin@uab.gov.tr - ali.ketencioğlu@uab.gov.tr
- ✓ Yüz-yüze iletişim: (İnşaat aşamasında şantiye sahasında yetkililerin bulunacak, bu yetkililerin iletişim bilgileri inşaat sürecinde paylaşılacaktır.)
- ✓ Şikayet Kayıt Formu: Yerleşim yerlerine dağıtılacaktır
- ✓ Online Öneri ve Şikayet Formu

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Direct Message sent to PAPs:

"You can access the details, visual materials, environmental / social documents and information video of the Filyos Port and Industrial Zone Railway Connection Project planned by the Ministry of Transport and Infrastructure from the address link; <https://aygm.uab.gov.tr/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gelistirme-projesi>. We kindly ask you to send your questions / comments / suggestions about the Project through the communication channels on the project website until May 6, 2020.

General Directorate of Infrastructure Investments"

APPENDIX-5 OFFICIAL CORRESPONDENCES TO NATIONAL AND LOCAL INSTITUTIONS



T.C.
ULAŞTIRMA VE ALTYAPI BAKANLIĞI
Altyapı Yatırımları Genel Müdürlüğü

Sayı : 58891979-622.02-20446
Konu : Görüş Talebi

05/05/2020

DAĞITIM YERLERİNE

Bakanlığımız Altyapı Yatırımları Genel Müdürlüğünce etüdü proje işleri tamamlanan Filyos Limanı ve Filyos Endüstri Sanayi Bölgesi Demiryolu İltisak Hattı Bağlantısı ile Çukurova Bölgesi ve Iskenderun Körfezindeki Sanayi Tesislerine - Yumurtalık Serbest Sanayi Merkezlerine ve Limanlara Demiryolu İltisak Hattı Bağlantısı Projeleri Dünya Bankasından temin edilmesi planlanan kredi ile yapılacaktır. Bu kapsamda söz konusu projeler için Dünya Bankası Standartlarında hazırlanan Çevresel ve Sosyal Etki Değerlendirme Raporları Türkçe ve İngilizce olarak hazırlanarak, AYGM web sitesinde Projeler sekmesi altında yer alan "<https://aygm.uab.gov.tr/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gelistirme-projesi>" linkine eklenmiştir.

İlgili linkte yer alan raporlarla ilgili olarak varsa görüş ve önerilerinizin en geç 06 Mayıs 2020 tarihine kadar resmi yazı ve "guzide.sayin@uab.gov.tr" adresine de elektronik posta yoluyla iletilmesi hususunda bilgilerinizi ve gereğini rica ederim.


Dr. Yalçın EYİĞÜN
Bakan a.
Genel Müdür

Dağıtım:

ÇAYCUMA BELEDİYESİ
FİLYOS BELEDİYESİ
ÇAYCUMA İLÇE TARIM VE ORMAN MÜDÜRLÜĞÜ
İL KÜLTÜR TURİZM MÜDÜRLÜKLERİ
FİLYOS ENDÜSTRİ BÖLGESİNİ İŞLETEN TOSYALI HOLDİNG
ÇAYCUMA TARIM KREDİ KOOPERATİFİ

