



REPUBLIC OF TURKEY  
MINISTRY OF TRANSPORT  
AND INFRASTRUCTURE



Altyapı Yatırımları Genel Müdürlüğü



# ÇUKUROVA REGION AND İSKENDERUN BAY RAILWAY CONNECTION PROJECT

## STAKEHOLDER ENGAGEMENT PLAN

CNR-ADN-SEP-002

Final

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## ABBREVIATIONS & ACRONYMS

<b>ADR</b>	Agreement concerning the International Carriage of Dangerous Goods by Road
<b>BOTAŞ</b>	Petroleum Pipeline Corporation
<b>BTC</b>	Baku-Tbilisi-Ceyhan Main Export Oil Pipeline
<b>CİMER</b>	The Presidency's Communication Center
<b>ÇINAR</b>	ÇINAR Engineering and Consulting Inc.
<b>ÇKA</b>	Çukurova Development Agency
<b>CLO</b>	Community Liaison Officer
<b>Co.</b>	Company
<b>DAPEK</b>	Eastern Mediterranean Petrochemicals
<b>DGII</b>	General Directorate of Infrastructure Investments
<b>DOĞAKA</b>	Eastern Mediterranean Development Agency
<b>DSİ</b>	State Hydraulic Works
<b>EIA</b>	Environmental Impact Assessment
<b>EMBA</b>	Electricity Production Co. Inc. Joint Venture company of Chinese Shanghai Electric Power Company
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESMS</b>	Environmental and Social Management System
<b>ESS</b>	Environmental and Social Standard
<b>EU</b>	European Union
<b>EXPO</b>	World Fair
<b>FGD</b>	Focus Group Discussion
<b>GM</b>	Grievance Mechanism
<b>GRS</b>	World Bank Grievance Redress Service
<b>Inc.</b>	Incorporated
<b>IPA II</b>	European Union Instrument for Pre- Accession Assistance
<b>İSKEN</b>	İskenderun Energy Production and Trade Inc.
<b>İŞKUR</b>	Turkish Labor and Employment Institution
<b>KVKK</b>	Personal Data Protection Law
<b>LMC</b>	Last-Mile Connectivity
<b>MIP</b>	Mersin International Port
<b>MoTI</b>	Ministry of Transport and Infrastructure
<b>NGO</b>	Non-governmental Organization
<b>OIZ</b>	Organized Industrial Zone
<b>PAP</b>	Project Affected People or Persons
<b>PDO</b>	Project development object
<b>PIU</b>	Project Implementation Unit
<b>PPM</b>	Public Participation Meeting
<b>PR</b>	Public Relations
<b>RP</b>	Resettlement Plan

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<b>RLIP</b>	Rail Logistics Improvement Project
<b>SEA/SH</b>	Sexual Exploitation and Abuse / Sexual Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>TA</b>	Technical Assistance
<b>TAYSEB</b>	Toros Adana Yumurtalık Free Zone Founder and Operator Incorporated Company
<b>TEİAŞ</b>	Turkish Electricity Transmission Corporation
<b>the Project</b>	Çukurova Region and İskenderun Bay Railway Connection Sub-Project
<b>TL</b>	Turkish Lira
<b>WB</b>	World Bank
<b>WBG</b>	World Bank Group
<b>YİMER</b>	Foreigners Communication Center





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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 Çukurova Region and Iskenderun Bay Railway Connection under Component 1 of Improving Railway Connectivity Project (hereafter referred to as “Çukurova Region and Iskenderun Bay Railway Connection Project” or just “Project”). By undertaking activities proposed in this SEP, the 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. Project Implementation Unit (PIU) in DGII will be responsible for implementing the SEP.

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

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 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 Project Description

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

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

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 III – 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 in Çukurova Region and İskenderun Bay – Toros, Adana, Yumurtalık Free Zone (TAYSEB) industrial centers and ports. The main purpose of the Çukurova Region and İskenderun Bay Railway Connection Sub-Project (the Project) is to make the transportation of raw materials and products economical by making infrastructure connection (such as OIZ - Port connection, OIZ - Main line connection) between the industrial areas. The railway connection line will connect the existing Osmaniye OIZ, Ceyhan OIZ and Ceyhan Energy Specific OIZ to the existing Toprakkale - İskenderun railway line at the existing Erzin Station.

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## 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 (SEP) 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 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.

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
- International Finance Corporation (IFC) Performance 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 the Çukurova Region and İskenderun Bay Railway Connection 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 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.

## 2.2 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 ESS requirements related to SEP are outlined in Table 1.

**Table 1. World Bank Requirements**

No	ESS	Scope	Stakeholder Engagement Requirements
<b>ESS 1</b>	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 achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).	ESS1 specifies the requirements for Stakeholder engagement and disclosure with reference to the risk classification of projects.
<b>ESS 2</b>	Labor and Working Conditions	ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth.	ESS2 prescribes that workers' should be provided with information about and documentation about their employment and provided access to a Workers' GM.
<b>ESS4</b>	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 PAPs on Project CHS risks and access to GM
<b>ESS5</b>	Land Acquisition and Involuntary Resettlement	Avoiding forced displacement, and if absolutely necessary, assessing alternative project	ESS5 requires consultations with PAPs on RP and access to GM



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No	ESS	Scope	Stakeholder Engagement Requirements
		plans and minimizing forced displacement.	
<b>ESS10</b>	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.



### 3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholders have been duly acknowledged, 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. These stakeholders comprise a diverse group, including public authorities, local community leaders (Mukhtars), landowners and users, as well as other Project Affected People or Persons (PAPs). Multiple consultations have taken place with these stakeholders, serving various purposes.

Stakeholders identified within the region have been informed about the specific location, components, and land requirements associated with the Project. In the context of the first step of Phase 2, stakeholder meetings have been documented and are presented in Table 2. These meetings served as a platform for conveying information to stakeholders regarding the corporate communication framework that will be established for their engagement, as well as the process for addressing grievances or complaints. Furthermore, discussions were held to explore potential strategies for mitigating both the positive and negative impacts of the Project on stakeholders.

**Table 2. Summary of Engagement Activities for Phase 1**

Date	Venue	Participants	Scope of Meeting
14.01.2020	Hatay / Erzin / Aşağıburnaz Village Council	Mukhtar, community members	Project-affected parties have been furnished with a comprehensive overview of the project, including its general description and key information. This includes details about the planned project activities and the anticipated timeframe for their execution. Furthermore, the land requirements for the project have been clearly communicated to the affected parties.
15.01.2020	Adana/ Ceyhan / Kurtpınar Village Council	Mukhtar, community members	
15.01.2020	Adana/ Ceyhan / Sarımaşı Village Council	Mukhtar, community members	
15.01.2020	Süper Enerji Coal Storage Facility	Facility Manager	
15.01.2020	Toros Agriculture Industry and Trade	Process and Planning Manager, Operating Manager, Marketing Manager	
16.01.2020	Hatay / Erzin / Turunçlu Village Council	Mukhtar, community members	
16.01.2020	Hatay / Erzin / Yeşiltepe Village Coffeehouse	Mukhtar, community members	
16.01.2020	Hatay/ Erzin / Yukarıburnaz Village Coffeehouse	Mukhtar, community members	The Erzin district's industry and trade capacity are important factors to consider when assessing the potential impacts of a project in the area. To evaluate these impacts, we need to understand the existing
16.01.2020	Erzin Chamber of Industry and Trade	Institution authorities	

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Date	Venue	Participants	Scope of Meeting
			economic activities and how they might be influenced by the project.
16.01.2020	Erzin Yeşilkent Irrigation Cooperative	Deputy Manager	The agricultural potential of the Erzin-Dörtöl plain is significant and plays a vital role in the local and regional economy. Understanding this potential and assessing the potential impacts of the Project on water resources and irrigation systems is crucial for sustainable development and responsible project planning.
17.01.2020	Osmaniye / Toprakkale / Büyüktüysüz Village Coffeehouse	Mukhtar, community members	Project-affected parties have been provided with a comprehensive presentation of the project through the following details: General Description and Information about the Project Planned Project Activities and Timeframe Land Requirements Potential Impacts on Local Communities
17.01.2020	Toros Adana Yumurtalık Free Zone	Operating Manager, Marketing and Sales Manager	The general description and scope of the project, along with its business area, employment and capacity of the facility, and proposed impacts, are key components to understand the project's nature and potential effects
17.01.2020	Osmaniye Organized Industrial Zone (OIZ)	Engineer and Technical Personnel	General description and scope of the project, its business area, employment and facility capacity, as well as the proposed impacts
17.01.2020	Erzin District Directorate of Agriculture and Forestry	Deputy Manager of the Institution and personnel	Agricultural statistics of Erzin region, agricultural potential of Erzin-Dörtöl plain, proposed impacts of the Project on agricultural lands
17.01.2020	Erzin Chamber of Agriculture	Head of the Chamber	
11.02.2020	Adana / Ceyhan / Sarımsazı Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	The provision of detailed information about the land requirements of the project, as well as the assets or immovable properties that will be affected, is crucial for transparency and effective engagement with project-affected parties. This information ensures that stakeholders, including property owners and the local community,
11.02.2020	Hatay / Erzin / Turunçlu Village Council	Mukhtar, PAPs (affected land owners/ shareholders/ users)	
12.02.2020	Hatay / Erzin / Yukarıburnaz Village Coffeehouse	Mukhtar, PAPs (affected land owners/ shareholders/ users)	



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Date	Venue	Participants	Scope of Meeting
13.02.2020	Hatay / Erzin / Yeşiltepe Village Coffeehouse	Mukhtar, PAPs (affected land owners/ shareholders/ users)	have a clear understanding of the project's impact on land and property.

During preparing the Project documents, which include the ESIA, Environmental and Social Management Plan (ESMP), Resettlement Plan (RP), and Stakeholder Engagement Plan (SEP), a disclosure process was initiated. The primary objective was to inform stakeholders about the potential environmental and social impacts of the Project and the corresponding measures and compensations outlined in the Project documents. Feedback from stakeholders was actively sought to incorporate into the final versions of these documents.

Feedback on the disclosed documents was gathered through various channels, including official correspondence, online feedback forms, emails, and a dedicated hotline established for this purpose. To ensure comprehensive dissemination of information, additional consultations were held with Mukhtars to ensure that all Project-Affected Persons (PAPs) were informed about the Project documents and received relevant messages from the project's implementing body, DGII. The effectiveness of these communication methods was assessed in consultation with the Mukhtars, considering the proportion of people with online access, the access to the consultations for sensitive groups and local people, and additional measures were implemented accordingly.

For PAPs without access to online channels, a concise summary of the disclosed documents was prepared and shared via Mukhtar. Mukhtars were also entrusted with conveying the questions and concerns of PAPs who were unable to access the digital channels. The mukhtars serve as a focal point for communication in the villages where all verbal and written information is conveyed to the public. Mukhtars inform the villagers verbally and in writing (by leaving written documents in coffeehouses, village chambers or mukhtar offices or by hanging posters if there are any) and mediate feedback.

DGII also engaged with institutional stakeholders as part of the disclosure process, in line with the SEP. Official opinions were solicited from institutions and organizations through official correspondences concerning the disclosed Project documents. Both national and local institutional stakeholders received formal letters from DGII.

Feedback received from stakeholders during the disclosure process has been comprehensively documented in the earlier version of SEP and earlier version of RP documents, with specific references to relevant sections of the RP and ESIA documents. While many of the concerns raised have been addressed within these documents, DGII remains committed to providing responses to the questions and concerns of PAPs. It has been noted that the majority of questions and complaints were related to the Project revision at Erzin Port station. Aside from this topic, the RP and ESIA field studies have indicated that public sentiment towards the Project is largely positive.

One part of the stakeholder engagement activities conducted within the scope of Phase 2 was carried out in May 2023. For these activities, the ÇINAR team, the contractor company, World Bank, and Ministry of Transport and DGII employees also participated. The stakeholder engagement activities were conducted in conjunction with field inspection visits. In a sense, the site visit related to the pre-construction period, allowing for on-site observation. During these visits, some stakeholders were interviewed and their opinions have been provided in Table 3.

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**Table 3. Summary of Engagement Activities for Phase 2-1**

Date	Venue	Type	Stakeholders	Number of Participants	Meeting Results
29.09.2022	Çukurova	Face to face	6 <sup>th</sup> Provincial Directorate of General Directorate of State Hydraulic Works	4	The project is located within areas designated as strict protected zones, encompassing both 1st and 2nd-degree protection zones. The source of this project yields multiple outputs. Specific regulations define the limitations applicable to this source for drinking water purposes. The transfer of resources from the irrigation area is contingent upon decisions made by the Soil Protection Board. Meanwhile, the Ministry of Energy and Natural Resources holds the authority to identify the Renewable Energy Resource Areas. Furthermore, it has been observed that the region's geology is characterized by a high permeability due to the presence of basaltic and conglomerate structures.
29.09.2022	Çukurova	Face to face	Ceyhan Organized Industrial Zone	1	The project underwent a thorough evaluation within the framework of its respective zoning plans. It has been emphasized that the letter dated 05.07.2022 is considered null and void due to the impending relocation of Toros Tarım within a period of six months. While a decision has been made to relocate the line towards the southern direction, a corresponding adjustment to shift it northward has been deemed unsuitable. Instead, expansion towards the northern direction is being planned.
30.09.2022	Çukurova	Face to face	Erzin Organized Industrial Zone	3	It has been communicated that the project aligns with a necessary intersection project that must be executed. Additionally, an alternative route has been suggested, passing through the Erzin OIZ. It has been pointed out that in the existing configuration, the line intersects with the road on two occasions, whereas the proposed route entails a single intersection with the road.  Moreover, electrical transmission lines were acquired from TEİAŞ (Turkish Electricity Transmission Corporation) four months ago and are presently being transformed into a gallery system.
30.09.2022	Çukurova	Face to face	Osmaniye Organized Industrial Zone/Tosyalı Holding	8	There are the key points and requests related to the project: A request was made to position the station near the Customs Directorate. However, this location falls within a protected area. Connecting to the existing Erzin Railway was deemed not advantageous for the OIZs. Mention was made of the KNAUF project, which aims to establish a transportation route to the Black Sea through Türkiye. The necessity of having a station in Yukarıburnaz for the planned port was emphasized. The alternative route that requires truck loading was considered impractical. A challenge was pointed out due to the level difference between the Irrigation Area and the Project Area, with a protected area in the narrow space between them making passage difficult. It was mentioned that other projects are waiting in the zoning plan due to this project, specifically the Tosyalı project. A request was made for a meeting with the project design firm. It was noted that road construction work has commenced to establish the connection between the port and the railway.



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Date	Venue	Type	Stakeholders	Number of Participants	Meeting Results
30.09.2022	Çukurova	Face to face	Toros Adana Yumurtalık Free Zone Founder and Operator Inc.	2	It was communicated that the project traversed one of the remaining areas available for rental due to the specific characteristics of the soil structure. Besides, it was mentioned that the increasing number of companies engaging in container-related activities has led to a positive reception of the project by these entities.
30.09.2022	Çukurova	Face to face	Adana Provincial Directorate of Environment, Urbanization and Climate Change	3	A reminder was given that if the project incorporates a tunnel, it would fall under the purview of the new Environmental Impact Assessment (EIA) Regulation, which entails additional assessment and compliance requirements.

**Table 4. Summary of Engagement Activities for Phase 2-2**

Date	Venue	Type	Stakeholders	Number of Participants	Meeting Results
04.05.2023	Çukurova	Face to face	Republic of Türkiye Ministry of Trade Ceyhan Petrochemical Industry Zone Inc.	7	During the meetings, discussions centered around the ancient waterway, as well as the biodiversity studies previously conducted by Renaissance and ÇINAR experts in the port and terrestrial connection line. The economic dimension of the project was also brought to the forefront. Questions were raised about the type and volume of cargo handled by the facilities in the region. Efforts were made to understand Renaissance's relationship with the Port of Rotterdam and Sumitomo Corporation. The cost status of Renaissance's ongoing projects was discussed, and requests were made for the financial projections of the current projects.
04.05.2023	Çukurova	Face to face	Hatay Governorship Investment Monitoring Coordination Department and Erzin OIZ	15	During this meeting, previous discussions related to cultural assets were mentioned. Stakeholders conveyed their anticipation for the approval of the highway interchange project. According to the stakeholders, this interchange project will be crucial to prevent the intersection of the highway and the expressway. They also pointed out that the expansion area located under the expressway coincides with the planned project. The importance of promptly initiating the project was emphasized. Permissions from BOTAŞ regarding transitions were brought up for discussion. Technical reports prepared by Pamukkale University and Ankara University were mentioned, and according to the stakeholders, these technical reports have the capacity to evaluate all alternatives. The opinions of the stakeholders can be summarized in the following three headings: 1) After an earthquake, the region can be reopened for investment with such projects. 2) These investments are crucial for regional development. 3) The project can only have a positive impact on post-earthquake improvements.

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Although the project route and station points have not been definitively determined, stakeholder consultations for the Çukurova region within Phase 2 were conducted in August 2024, taking into account previous stakeholder engagement efforts. discussions with stakeholders are presented and key points of the interviews are summarized in the following. These points cover various aspects and perspectives related to the proposed railway project in the region, including economic, environmental, social, and logistical considerations.

- Project urgency and benefits
- Advantages of railways
- Integration of other railway projects
- Necessities of collaborations
- Environmental considerations
- Assessment of endemic species
- Post effects of earthquake
- Cultural changes
- Agricultural employment
- Planned projects
- Village concerns
- Syrian refugees

For the revision of the project documents, in accordance with the preliminary studies, a field study was carried out during 15-20 March 2024.

Mukhtar visits, Households surveys were conducted. Sarımazı, Aşağıburnaz, Yukarıburnaz, Hürriyet and Turunçlu Villages were visited and Mukhtar surveys, Community Level Surveys (CLS) and Project-affected PAPs and Household Level Surveys (HH Surveys) were carried out in the affected settlements (see Table 5).

The opinions, suggestions and concerns of Mukhtars and PAPs about the Project were recorded and the potential impacts were assessed.

Table 5. Detailed Governmental Engagement Activities for Phase 2-3

Date	Venue	Type	Stakeholders	Number of participants	Meeting Results
28.08.2023	Çukurova	Face to face	Republic of Türkiye Ministry of Transport and Infrastructure Turkish State Railways 6th Regional Directorate Traffic and Station Management Directorate	1	<p><b>Traffic Service Manager:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>▪ <b>Urgency:</b> Rapid progress is needed due to potential intersections with high-speed train projects in Toprakkale and Ceyhan.</li> <li>▪ <b>Existing Connections:</b> Many areas already have port connection lines; connecting Erzin Station is viable.</li> <li>▪ <b>Capacity Issues:</b> The single-track line is congested and there is a shortage of wagons, requiring capacity expansion and infrastructure improvements.</li> <li>▪ <b>Low Traffic Handling:</b> Current lines handle only 6-7% of traffic, needing significant investment to increase capacity.</li> <li>▪ <b>Integration with Projects:</b> Integration with high-speed train projects can improve efficiency.</li> <li>▪ <b>Earthquake Impact:</b> Post-earthquake, the Malatya road closure has shifted traffic to Kayseri, stressing the railway and necessitating highway support.</li> </ul>
28.08.2023	Çukurova	Face to face	Republic of Türkiye Ministry of Transport and Infrastructure Turkish State Railways 6th Regional Directorate, Modernization Directorate	1	<p><b>Deputy Director of the Modernization Directorate:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>▪ <b>Railway Importance:</b> Railways are seen as a fast and cost-effective transportation method, especially for heavy industry in the Iskenderun region.</li> <li>▪ <b>Port and Facility Developments:</b> New facilities, such as the Atakaş connecting line and Tosyalı's steel port, are expanding to handle increased cargo and boost industrial growth.</li> <li>▪ <b>Investment and Industrial Growth:</b> Connecting the Erzin OIZ to the port by rail will enhance investment, reduce carbon emissions, and promote industrial development.</li> <li>▪ <b>Earthquake Impact:</b> The recent earthquakes have not significantly affected the pace of railway investments, though they have caused some migration from urban to rural areas.</li> <li>▪ <b>Capacity Expansion:</b> There is a need to double-track the Iskenderun-Toprakkale line and collaborate with the Gaziantep high-speed train line to meet traffic demands.</li> <li>▪ <b>Strategic Connections:</b> The project should consider extending connections to key industrial areas like the Chemical OIZ and potentially establish a connection from Ceyhan Station for efficiency.</li> </ul>
28.08.2023	Çukurova	Face to face	Republic of Türkiye Ministry of Transport and Infrastructure of the 5th Regional Directorate	1	<p><b>Deputy Director of the 5th Regional Directorate:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>▪ <b>Stakeholder Concerns:</b> Key stakeholders include local and regional authorities, cultural, labor, and employment institutions. Agricultural, grazing, and land access concerns are significant due to potential impacts on farming and commuting.</li> <li>▪ <b>Community Concerns:</b> Locals may worry about the railway's impact on agriculture, grazing, road access, and potential risks from transporting hazardous materials. Compliance with safety regulations and transparency about cargo types are crucial.</li> <li>▪ <b>Energy and Connectivity Questions:</b> There are questions about the railway's energy source, potential connections to fishing harbors, and the types of cargo to be transported.</li> <li>▪ <b>Public Sentiment and Resistance:</b> The public may resist the project due to fears of losing property or economic stability, especially post-earthquake. There is a need for clear communication to address local concerns and explain the long-term benefits of the project.</li> </ul>
28.08.2023	Çukurova	Face to face	Adana Metropolitan Municipality Projects Directorate	1	<p><b>Branch Manager:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>▪ <b>**Project Coordination**:</b> Questions arise about whether the project will be independent of the high-speed train and the initiation of infrastructure investments in Yumurtalık. Collaboration with the Adana Transportation Master Plan and other stakeholders like the Hacı Sabancı OIZ is necessary.</li> </ul>

Date	Venue	Type	Stakeholders	Number of participants	Meeting Results
					<ul style="list-style-type: none"><li>▪ <b>**Urban and Industrial Impact**</b>: The project could strengthen connections with local OIZs, though concerns about past train accidents and unfulfilled promises may affect public perception. There is a need for effective communication to address these concerns.</li><li>▪ <b>**Balancing Industry and Tourism**</b>: The region faces a dilemma between industry and tourism, with a general preference for industry due to job opportunities.</li><li>▪ <b>**Stakeholder Engagement**</b>: Important stakeholders include the Provincial Directorates of Environment, the General Directorate of State Hydraulic Works (DSİ), and the Ministry of Culture. Coordination with the 5th Regional Directorate of the Ministry of Transport and Infrastructure is essential for project planning and support.</li></ul>
28.08.2023	Çukurova	Face to face	Republic Of Türkiye Ministry Of Agriculture And Forestry General Directorate Of Nature Conservation And National Parks 7th Regional Directorate	2	<b>Regional Director and Deputy Regional Director:</b>  The key points are as follow:  Focus on Endemic Species: The institution specializes in assessments related to endemic species but requires an official request for detailed evaluations. Limitations in Opinion: Without knowledge of the project's route, the institution cannot provide a concrete assessment and suggests engaging with local communities for more relevant insights. Public Sentiment: Locals may be skeptical if the project increases costs related to port connections, and awareness campaigns, particularly concerning the Iskenderun lizard, could be beneficial.
28.08.2023	Çukurova	Face to face	Çukurova Development Agency Programming Unit	1	<b>Chief of the Programming Unit:</b>  The key points are as follow: <ul style="list-style-type: none"><li>▪ <b>Industrial Focus</b>: The region is becoming an industrial hub with significant investments in thermal power plants, chemical facilities, and container ports, posing environmental risks.</li><li>▪ <b>Environmental and Urban Concerns</b>: There's a delicate balance between industrial growth and environmental impact, particularly in sensitive areas like Yumurtalık wetlands. Pollution and urbanization are key concerns.</li><li>▪ <b>Regional Planning</b>: The 2024-2028 Regional Plan emphasizes employment, competitive balance, and adapting to the EU Green Deal.</li><li>▪ <b>Seismic and Climate Risks</b>: The region is vulnerable to earthquakes and climate-related risks, necessitating careful disaster management and infrastructure planning.</li><li>▪ <b>Migration Impact</b>: Post-earthquake migration has led to increased housing demand and unemployment, further straining the region.</li></ul>
29.08.2023	Çukurova	Face to face	Republic of Türkiye Ministry of Trade, Adana Yumurtalık Free Zone Toros Adana Yumurtalık Free Zone Founder and Operator Incorporated Company (TAYSEB)	1	<b>Director of Republic of Türkiye Ministry of Trade, Adana Yumurtalık Free Zone and Operations Manager:</b>  The key points are as follow: <ul style="list-style-type: none"><li>▪ <b>Stakeholders and Infrastructure</b>: TAYSEB manages the Adana Yumurtalık Free Zone until 2030, providing essential services and potentially extending its role by up to 9 years.</li><li>▪ <b>Railway and Port Needs</b>: The region prefers railway lines and stations to avoid free zone land, due to existing infrastructure like the BOTAS pipeline. Toros Port and Ceyhan OIZ are the primary beneficiaries of potential railway connections.</li><li>▪ <b>Land Constraints</b>: There is limited leasable land left in the free zone, and the construction of new infrastructure, like railway lines, should avoid encroaching on the free zone's territory.</li></ul>
29.08.2023	Çukurova	Face to face	Ceyhan Chamber of Commerce Ceyhan Organized Industrial Zone	4	<b>President of and Vice Presidents of Ceyhan Chamber of Commerce and Members of the Ceyhan Organized Industrial Zone Board of Directors:</b>  The key points are as follow: <ul style="list-style-type: none"><li>▪ <b>Earthquake Risk</b>: Ceyhan faces significant earthquake risks, situated between fault lines.</li><li>▪ <b>Railway Line Proposal</b>: There's a proposal for the railway to pass through Ceyhan OIZ, following a route that could save government expenses and connect key industrial areas like Sanko, İSKEN, and SASA.</li></ul>

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Date	Venue	Type	Stakeholders	Number of participants	Meeting Results
					<ul style="list-style-type: none"> <li>Economic and Demographic Changes: Ceyhan is less active in foreign trade compared to the Mersin region and is experiencing demographic shifts, with unskilled migration and cultural changes due to recent earthquakes and Syrian migration.</li> <li>Infrastructure and Development Needs: The region requires activation of the Ceyhan line and improvements in municipal services to overcome current developmental challenges.</li> </ul>
29.08.2023	Çukurova	Face to face	ByPort Petroleum Product Terminal Services Inc.	2	<p><b>ByPort Petroleum Product Terminal Services Inc. Terminal Manager and HSE-Q Executive:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>Two projects planned within a special industrial zone.</li> <li>EIA report obtained for one project; EIA application being prepared for the other.</li> <li>Public meeting held in Hatay Erzin, involving Aşağıburnaz, Yukarıburnaz, and Turunçlu villagers.</li> <li>Concerns raised about potential threats to the Burnaz coastline.</li> <li>EIA application being prepared for marine structures in the industrial zone.</li> <li>Facility located 8-9 km from BOTAŞ terminal; 6000-acre Asset Fund land between Dört Yol and Erzin.</li> <li>EIA study conducted for the 6000-acre land.</li> <li>Southern part of the land suitable for railway transport.</li> <li>25% of raw materials used in Gaziantep industrial facilities.</li> <li>Facility processes propane gas into granular structures; does not melt plastic, process metal, or have chimneys.</li> <li>Granular materials transported by road or railway in 25 kg bags or containers.</li> <li>Demand for a railway connection to avoid disrupting nearby Tosyalı Holding operations.</li> <li>Facility connects to the narrow E5 highway; Tosyalı Holding has its own road to Osmaniye OIZ.</li> </ul>
29.08.2023	Çukurova	Face to face	Erzin Chamber of Agriculture	1	<p><b>Head of Erzin Chamber of Agriculture, Landowner on Aşağıburnaz locality:</b></p> <p>The key points are as follow:</p> <ul style="list-style-type: none"> <li>The project has multiple impacts, including psychological effects on landowners who view trees as cherished.</li> <li>There may be a decrease in land value due to reduced productivity.</li> <li>The earthquake did not damage agricultural structures but worsened labor force issues.</li> <li>Post-earthquake, laborers became less willing to work, affecting accommodation availability and increasing costs.</li> <li>Daily wages for agricultural laborers are at least 650 TL, with many preferring industrial work over agriculture.</li> <li>There is a challenge in hiring laborers, with some Syrians working with or without registration, and former agricultural workers moving to other businesses.</li> <li>Small land parcels are costly to operate, suggesting a need for land consolidation and cooperative approaches.</li> <li>The region faces high drug use and political isolation, with ineffective measures to address the issues.</li> </ul>
29.08.2023	Çukurova	Face to face	Eastern Mediterranean Development Agency (DOĞAKA)	1	<p><b>Secretary-General of DOĞAKA:</b></p> <p>The key points are as follow:</p> <p>Project Focus: Connecting industrial zones, with a key focus on railway connectivity for Osmaniye OIZ and other industrial areas.</p> <p>Osmaniye OIZ: One of the largest in the region, eagerly awaiting a railway connection.</p> <p>Erzin OIZ: In the establishment phase; currently inactive.</p> <p>Ceyhan Industrial Energy Zone and Dört Yol: Hydrogen facilities and ongoing developments; railway connectivity is crucial.</p> <p>Regional Logistics: Significant for both goods and labor due to high-speed train routes.</p> <p>Industrial vs. Agricultural Balance: Industrial areas dominate, but agriculture remains important (e.g., citrus production, parsley).</p> <p>Impact of the Earthquake:</p> <p>Minimal effect on OIZs; small industrial sites faced more challenges.</p> <p>Temporary production disruptions in Iskenderun, but operational.</p> <p>Labor shortages and migration issues due to the earthquake.</p>



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Date	Venue	Type	Stakeholders	Number of participants	Meeting Results
					<p>Syrian Population: Numbers were decreasing before the earthquake; trend stabilized but began decreasing again.</p> <p>Agriculture: Limited impact anticipated; potential shift to greenhouse cultivation and new crop varieties.</p> <p>Socio-Cultural Impact: Local population predominantly; limited environmental activism expected, but regional issues like Burnaz and thermal power plants are more prominent.</p>
31.08.2023	Çukurova	Remote	Ceyhan Petrochemical Industry Zone Inc. Eastern Mediterranean Petrochemicals (DAPEK) (Formerly known as Ceyhan Petrochemical Industry Zone Inc.)	1	<p><b>Operation Executive:</b></p> <p>We are part of the Green Port project, and we have expressed the desire for the railway to extend to our region. We have been asked to provide a presentation on the promotion of goods transported from the port. The management company for the Ceyhan Petrochemical Industrial Zone is Rönesans. Name of the company Ceyhan Petrochemical Industry Zone Inc. has been changed as Eastern Mediterranean Petrochemicals (DAPEK). An office has also been established within the industrial zone. In terms of port management, we have a collaboration with the port of Rotterdam; however, they are not our partners. Rönesans Holding has signed a framework cooperation agreement with the Netherlands-based Port of Rotterdam for the Ceyhan Mega Petrochemical Industrial Zone in Türkiye. We are only receiving services from them in terms of port management. However, we have a partnership with the national oil and gas company of Algeria, Sonatrach, in the polypropylene facility</p>
28.08.2023	Çukurova	Could not be achieved	Republic of Türkiye Ministry of Transport and Infrastructure General Directorate of Highways, Adana 57th Branch Office Chief	0	<p>Due to renovation works at this institution, the building has been relocated to another address. However, it has not been possible to reach the address of the temporary operational facility. In light of the discussions with other stakeholders, it was deemed more sufficient for impact assessment purposes to engage with the Mersin 5th Regional Directorate instead of branch offices. Therefore, no telephone meetings have been organized</p>
31.08.2023	Çukurova	Cancelled	Erzin Organized Industrial Zone	0	<p><b>Industrial Zone Manager Governor's Office Employee:</b></p> <p>The planned meeting could not take place due to the ongoing earthquake debris removal efforts under the auspices of the Governorship in the Hatay and Antakya regions</p>

Table 6. Local PAPs and Community Stakeholder Engagement Activities for Phase 2-3

Date	Venue	Type	Stakeholders	Meeting Results
30.08.2023	Çukurova	Focus Group Discussion (FGD)	Mukhtars of neighborhoods and residents	<p>1) Aşağıburnaz Mukhtar</p> <p>2) Sarımazi Mukhtar</p> <p>3) Turunçlu Mukhtar</p> <p>4) Yeşiltepe Mukhtar</p> <p>5) Yukarıburnaz Mukhtar</p> <p>6) Büyüktüysüz mukhtar did not attend to the FGD</p> <p>7) Head of Turunçlu Village Association</p> <p><b>Local residents from Turunçlu</b></p> <p>1) Male / No another demographic information</p> <p>2) Male /42 / Worker</p> <p>3) Male /65/ Retired-Farmer</p> <p>4) Male /66 / Retired</p> <p>5) Male /72 / Retired-Farmer</p> <p>6) Male/36 / Worker</p> <p>7) Male/34 / Worker</p> <p><b>Project Impact and Local Concerns</b></p> <ul style="list-style-type: none"> <li>▪ <b>Project Overview:</b> The ongoing project involves significant infrastructure work intersecting key areas in the villages of Aşağıburnaz, Yukarıburnaz, and Sarımazi. The densely populated region faces considerable road challenges, including severe traffic congestion and frequent accidents, particularly near the Dörtöl area due to train intersections.</li> <li>▪ <b>Route Issues:</b> The proposed route, stretching from BOTAŞ to Kurtkulağı, conflicts with local land use, especially Class 1 agricultural land. Initial approval of the route was reversed, causing concern among residents who previously supported the plan. Changes in the route due to protection zones and potential impacts on agricultural land have led to frustration and confusion.</li> <li>▪ <b>Expropriation and Land Use:</b> There are significant concerns about the division and loss of agricultural land, exacerbated by past expropriation issues. Residents feel that past projects, such as those by Tosyalı, have already</li> </ul>

				<p>harmd their agricultural lands without adequate compensation or access rights. They request that the new route be carefully planned to avoid further disruption.</p> <ul style="list-style-type: none"><li>▪ <b>Infrastructure Needs:</b> The mukhtars highlight the need for proper access points and infrastructure. Problems such as high culverts and inadequate crossings are noted, impacting agricultural activities. They advocate for utilizing existing roads, expanding gravel paths, and adding necessary crossings, underpasses, and overpasses to minimize disruptions.</li><li>▪ <b>Community Impact:</b> The region has faced various challenges, including poor road conditions, insufficient agricultural irrigation, and population changes due to recent natural disasters and the influx of refugees. The local population, including around 250 Syrian refugees, has been affected by these issues, and there is a need for balanced development that respects both local needs and industrial interests.</li><li>▪ <b>Historical and Cultural Significance:</b> The area, historically significant and agriculturally rich, is under pressure from development. The mukhtars emphasize the importance of consulting with local residents and protecting their livelihoods while balancing development needs.</li><li>▪ <b>Request for Fairness:</b> The mukhtars call for fairness in investment and planning. They urge that the project should not only address infrastructural needs but also be sensitive to the local agricultural economy and community rights. They are familiar with environmental and planning processes and stress that proper communication and adherence to procedures are crucial for successful project implementation.</li></ul>
15-20 March 2024.	Çukurova	Face to face	Project Aol Settlements	<p>For the revision of the project documents, in accordance with the preliminary studies, a field study has been carried out between 15-20 March 2024.</p> <p>Mukhtar visits, Households surveys have been held. Sarımaşı, Aşağıburnaz, Yukarıburnaz, Hürriyet and Turunçlu Villages are visited and Mukhtar surveys, Community Level Surveys (CLS) and Project-affected PAPs and Household Level Surveys (HH Surveys) were carried out in the affected settlements.</p> <p>The opinions, suggestions and concerns of Mukhtars and PAPs about the Project were recorded and the current impacts were determined.</p> <p>Based on the field work and interviews described above, Project ESIA, RP and SEP documents have been updated. Relevant outputs and results are presented in the ESIA, SEP and RP documents revised based on field work outputs.</p>

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As part of the project, stakeholder participation/consultation meetings have been held in two locations across the provinces of Adana and Osmaniye on 13.06.2025. A Leaflet prepared for the project (see Appendix-4) has been distributed in the meetings and invitation letters, and governmental organizations were also notified through an official letter (see Appendix-4). Additionally, efforts were made to reach the Mukhtars, who were consulted during the ESIA process, via WhatsApp platform using their contact numbers.

Information about the meetings is provided in Table 7.

**Table 7. Information about the Stakeholder Participation Meetings**

Meeting Province	Meeting Place	Address	Date	Time	Number of Participants
Adana	TAYSEB Conference Hall	Sarımazı, Ceyhan, 01920 Adana	13.06.2025	11:00-13:00	25
Osmaniye	Osmaniye OIZ Conference Hall	E.Ayhan Tosyalı Cad., No:20, Toprakkale/Osmaniye	13.06.2025	14:00-16:00	21

The meetings were recorded, and the minutes of the meetings are included in Appendix-4, along with photographs from the sessions. However, due to personal data protection laws (KVKK), the participant list for each meeting is not shared and minutes of meetings are given anonymously.

The project introduction and all environmental and social documents prepared as part of the project are available on AYGM's website (<https://aygm.uab.gov.tr/dunya-bankasi-turkiye-demiryolu-lojistikini-gelistirme-projesi>).

## **TAYSEB**

During the stakeholder meeting held at TAYSEB Conference Hall on 13.06.2025 with the participation of 25 people (see Figure 1), the disaggregated information for the participants is provided in the table below.

**Table 8. Disaggregated Participant Information for TAYSEB SPM**

Category	Details	Number of Participants	Female	Male
Mukhtars	Sarımazı Village	1	-	1
Engineers/Technicians from DSİ Branch/Regional Directorates	One (1) engineer from DSİ Regional Directorate, one (1) engineer and one (1) landscape architect from DSİ Branch Directorate	3	2	1
Business Owners/Workers	Engineers, managers, etc. from companies within TAYSEB  Participating companies:  -Köksan Pet Plastic Packaging Industry and Trade Inc. -Aktaş Foreign Trade Inc. -Samet Ready-Mix Concrete Construction Limited Company -Yonca Food Industry Enterprises Domestic and Foreign Trade Inc. -Likit Chemical Industry and Trade Inc.	11	2	9

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	-Aschem Petrochemical Industry and Trade Inc. -Mavi Sistem Environmental Consulting -BC International Food Trade Inc.			
TAYSEB Official	-	1	-	1
DGII Official	Social Expert	1	1	-
Consultants and Contractors	Özgün-Özdemir Construction Joint Venture (Contractor) Optimal-Eptisa-Optim-Obermeyer Joint Venture (Consultant)	8	3	5
<b>Total</b>		<b>25</b>	<b>8</b>	<b>17</b>

The following issues related to questions and concerns were raised:

- The current route of the Project and locations of the stations to be built,
- How the Project will affect the surroundings as in environmental conditions,
- The process of loading-unloading activities after the Project is realized,
- The Project's benefit to nearby businesses,
- The start and end dates of the Project, and
- Whether the Project will be connected to the newly planned container port in Gölova Region.

During the stakeholder meeting, participants raised questions mainly concerning the current route, locations of stations, environmental implications, and railway connectivity to ports and industrial zones. The contractor confirmed that the presented route reflects the latest design, although final approval is pending, and explained the status of the planned Erzin Port. Clarifications were provided on possible route changes. Questions regarding branch lines to ports, environmental impacts, operational responsibilities for the new TAYSEB station, and the removal of certain route sections were also addressed. The project completion is targeted for December 2027, with construction activities already underway.

No formal objections or strong negative reactions to the project were recorded. The discussion points reflected requests for clarification rather than opposition. Based on the meeting outcomes, no changes to the Environmental & Social (E&S) documents or to the project design are required at this stage. For further information, please refer to minutes of meetings.



Figure 1. Stakeholder Participation Meeting in TAYSEB Conference Hall

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## **Osmaniye OIZ**

During the stakeholder meeting held at Osmaniye Organized Industrial Zone Conference Hall on 13.06.2025, with the participation of 21 people (see Figure 2), the disaggregated information for the participants is provided in the table below.

**Table 9. Disaggregated Participant Information for Osmaniye OIZ SPM**

Category	Details	Number of Participants	Female	Male
Mukhtars	Hürriyet, Turunçlu, Aşağıburnaz, Yukarıburnaz neighborhoods	4	-	4
Engineers/Technicians from DSİ Branch Directorates	-	4	1	3
Osmaniye Provincial Directorate of Environment, Urbanization and Climate Change	-	1	-	1
Representatives from Osmaniye Organized Industrial Zone (OSB)	Regional Director and Engineer	2	-	2
Ceyhan Left Bank Irrigation Union	Civil Engineer	1	-	1
DGII Official	Social Expert	1	1	-
Consultants and Contractors	Özgün-Özdemir Construction Joint Venture (Contractor) Optimal-Eptisa-Optim-Obermeyer Joint Venture (Supervision Consultant)	8	3	5
<b>Total</b>		<b>21</b>	<b>5</b>	<b>16</b>

The following issues related to questions and concerns were raised:

- The current route of the Project and locations of the engineering structures to be built,
- The status of the agricultural fields along the route,
- The process of expropriation and how the route will be located with the newly KGM's built road.
- Project's EIA process status,
- The width of the expropriation corridor, and
- Project works and its effects on current watering systems and water bodies.

The meeting focused on questions about route details, location of overpasses/underpasses, and expropriation. Local mukhtars and landowners in Aşağıburnaz expressed concerns about impacts on agricultural land and overlap with areas already expropriated for a KGM road. The contractor confirmed the alignment will run adjacent to, but not within, KGM's corridor and will require separate expropriation. DGII assured that the process will fully comply with Turkish law and the World Bank's ESS5, with no urgent expropriation and all rights secured before works begin. DSİ raised questions on irrigation areas and dry streambeds within the project area; the contractor noted DSİ's input is awaited and that absolute protection zones will be crossed via bridges.

No formal objections were raised, and questions mainly sought clarifications on technical and land acquisition issues. No changes to the E&S documents or project design are required at this stage, though future route changes due to DSİ inputs could require updates. For further information, please refer to minutes of meetings.

Following the discussions held with relevant parties, a Frequently Asked Questions (FAQ) document (Appendix-5) has been prepared to address the key issues, clarifications, and



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concerns raised during the engagement process. The document will be shared with stakeholders to ensure transparency, provide consistent information, and facilitate a common understanding of the project's objectives, processes, and expected outcomes.



**Figure 2. Stakeholder Participation Meeting in Osmaniye OIZ Conference Hall**

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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.

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:

- International organizations,
- National organizations,
- National / regional governmental bodies,
- Local governments or authorities,
- People/ community living in the vicinity of the Project area,

Project-Affected Persons (PAPs), including landowners and users who may have formal or informal rights to private, communal, state, or treasury lands, and who may formally or informally own immovable assets on affected lands.

- Organized Industrial Zones
- Free Zone in the Project Aol
- Energy Investment Areas
- Farm, mine, business, workplace, industrial or commercial areas in the surrounding area
- National or local CSOs/ NGOs,
- Professional chambers, trade, industry, agriculture chambers, cooperatives, sectoral organizations, labor associations or unions,
- Local and/or national media,
- Vulnerable groups: the elderly, the disabled, female-headed households, poor households and/or persons, illiterate persons, ethnic minorities, immigrants, refugees, etc.
- Seasonal agricultural workers
- Suppliers, service providers,
- Sub-contractors,
- Project employees.
- Project and contractor employees.

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 communities<sup>1</sup>.

**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

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

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adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits<sup>2</sup>.

#### 4.1 Project-Affected Parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups are defined within this category for the Project:

Local communities living in the settlements close to the Project locations (Kurtpınar, Sarımaşı, Turunçlu, Aşağıburnaz, Yukarıburnaz, Büyüktüysüz and Yeşiltepe) may be directly or indirectly affected by the Project e.g by construction impacts (noise, emission, vibration etc.). PAPs including landowners/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 be directly affected by the Project' land acquisition affecting their livelihood/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. Super Energy Coal Storage Facility is another project-affected party since it will be exposed to physical displacement.

- Suppliers, service providers,
- Sub-contractors,
- Project employees.
- Sub-contractor' employees.

##### 4.1.1 Disadvantaged/Vulnerable Individuals or Groups

Within the scope of the Project, the vulnerable or disadvantaged groups include but are not limited to the following:

- Elderly people in need of care and social assistance,
- Disabilities (Mental and Physical),
- Women who have lost their husbands/divorced,
- Home-bound due to chronic illness,
- Illiterate adult,
- Refugee/migrant,
- Earthquake victim<sup>[1]</sup>,
- Seasonal agricultural workers, including Syrian refugees.
- PAPs who don't know Turkish

Vulnerable groups identified in the settlements affected by the Project are explained above. Since the project impact area is an earthquake zone, the proportion of non-resident population still living in temporary shelters is high.

The project is explained above. Since the project impact area is an earthquake zone, the proportion of the non-resident population continuing to live in temporary shelters is high. Therefore, within the scope of Project activities, if vulnerable groups live in temporary containers or tents in the neighborhoods, the vulnerable/disadvantaged individuals/groups within these groups and defined above will be consulted through Mukhtars and/or through settlement visits. The population temporarily living in AFAD camp areas in the Project area is

<sup>2</sup> 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 benefits.

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also high. However, in cases where consultation activities need to be carried out in AFAD camps within the scope of the Project, information activities can be carried out by obtaining the necessary permissions between DGII and AFAD. The explanation of the participation methods to be carried out by the Project is given in the following sections.

## 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:

- 57th Branch Office Chief of Republic of Türkiye Ministry of Transport and Infrastructure General Directorate of Highways
- 5th Regional Directorate of Republic of Türkiye Ministry of Transport and Infrastructure
- 6th Provincial Directorate of General Directorate of State Hydraulic Works
- 6th Regional Directorate, Modernization Directorate, Republic of Türkiye Ministry of Transport and Infrastructure, Turkish State Railways
- 6th Regional Directorate, Traffic and Station Management Directorate of Republic of Türkiye Ministry of Transport and Infrastructure Turkish State Railways
- 7th Regional Directorate of Republic of Türkiye Ministry of Agriculture and Forestry General Directorate of Nature Conservation and National Parks
- Adana Metropolitan Municipality Projects Directorate
- Adana Provincial Directorate of Environment, Urbanization and Climate Change
- ByPort Petroleum Product Terminal Services Inc.
- BOTAŞ - Petroleum Pipeline Corporation
- BTC - Baku-Tbilisi-Ceyhan Main Export Oil Pipeline
- Ceyhan Chamber of Commerce
- Ceyhan Organized Industrial Zone
- Eastern Mediterranean Petrochemicals (Formerly known as Ceyhan Petrochemical Industry Zone Incorporated Company)
- Çukurova Development Agency Programming Unit
- Eastern Mediterranean Development Agency
- Erzin Chamber of Agriculture
- Erzin Chamber of Industry and Trade
- Erzin District Directorate of Agriculture and Forestry
- Erzin Organized Industrial Zone
- Erzin Yeşilkent Irrigation Cooperative
- Hatay Governorship
- Osmaniye Organized Industrial Zone
- Republic of Türkiye Ministry of Trade, Adana Yumurtalık Free Zone
- Toros Adana Yumurtalık Free Zone Founder and Operator Incorporated Company
- Toros Agriculture Industry and Trade
- Tosyalı Holding
- Local Potential Supplier Businesses,
- Local NGO/CSO in the Project Aol:
  - Erzin Social Assistance Association
  - Erzin Education Volunteers Association
  - Erzin Women's Solidarity Association
  - Erzin Environment and Historical Association for Protection
  - Erzin Environment Protection Association
  - Ceyhan Disabled Assistance and Solidarity Association
  - Chamber of Wood and Construction Craftsmen
- Local media
  - Crt News
  - Ceyhan Newspaper

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- New Ceyhan Newspaper
- Hatay Internet Tv
- Hatay New News Newspaper
- Hatay Newspaper
- Antakya Newspaper
- Hatay Asi Newspaper
- Hatay Söz Newspaper,

### 4.3 Stakeholder Matrix

Table 10 provides a summary of these details regarding the consultation and disclosure process.

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**Table 10. Stakeholder Matrix and Engagement Activities**

Project Stage	Topic of Consultation / Message	Target stakeholders	Method / Tool	Timetable	Frequency	Responsibilities
Project preparation and construction	Stakeholder consultations for preparation of project E&S documents	<ul style="list-style-type: none"> <li>Ministry of Transport and Infrastructure</li> <li>Ministry of Energy and Natural Resources</li> <li>Turkish Electricity Transmission Corporation</li> <li>Electricity Generation Company</li> <li>Ministry of Environment, Urbanization and Climate Change</li> <li>Ministry of Industrial and Technology</li> <li>Ministry of Agriculture and Forestry</li> <li>Ministry of Treasury and Finance</li> </ul>	<ul style="list-style-type: none"> <li>E-mail to external stakeholders</li> <li>Official correspondences</li> <li>Online meetings</li> </ul>	Before the Project construction activities will be started	Once at the beginning of the Project	DGII
Project preparation and construction	Stakeholder consultations for preparation of project E&S documents	<ul style="list-style-type: none"> <li>The PAPs affected by land acquisition</li> <li>Communities living in the neighborhood settlements of the project railway routes</li> <li>Mukhtars of the settlements</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder visits</li> <li>Consultation meetings</li> </ul>	Before the Project construction activities will be started	Once at the beginning of the Project	Consultant DGII
Project preparation and construction	Disclosure of the E&S instruments for the Project: <ul style="list-style-type: none"> <li>ESIA &amp; ESMP</li> <li>SEP including Grievance Mechanism (GM)</li> <li>Resettlement Plan (RP)</li> </ul>	<ul style="list-style-type: none"> <li>All stakeholders</li> <li>The PAPs affected by land acquisition</li> <li>Communities living in the neighborhood settlements of the project Aol</li> <li>Mukhtars of the settlements</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>E-mail to external stakeholders</li> <li>Online meetings</li> <li>Online interviews</li> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in both Turkish and Arabic</li> <li>Stakeholder visits</li> <li>Consultation meetings</li> </ul>	Once plans are approved pre-construction	At the beginning of the Project following the plans are approved	DGII
		<ul style="list-style-type: none"> <li>Vulnerable/disadvantaged individuals/ groups</li> </ul>	<ul style="list-style-type: none"> <li>Mukhtar visits</li> <li>Consultation meetings</li> <li>Focus Group discussions</li> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in Turkish, English and Arabic</li> </ul>	Once plans are approved pre-construction	At the beginning of the Project following the plans are approved	DGII



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Project Stage	Topic of Consultation / Message	Target stakeholders	Method / Tool	Timetable	Frequency	Responsibilities
		<ul style="list-style-type: none"> <li>Project employees</li> <li>Contractors' workers</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>Online meetings</li> <li>Face to face meetings</li> <li>Posters/ brochures/ flyers</li> </ul> Consultation meetings	Once plans are approved pre-construction	At the beginning of the Project following the plans are approved	DGII Contractor
Project preparation and construction	<b>Disclosure of the RP</b>	<ul style="list-style-type: none"> <li>PAPs affected by land acquisition</li> </ul>	<ul style="list-style-type: none"> <li>Consultation meetings</li> <li>DGII website</li> <li>Focus Group discussions</li> </ul>	Once plans are approved re-construction	At the beginning of the Project following the plans are approved	Contractor (for local settlements) and DGII
Project 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"> <li>Vulnerable/ disadvantaged individuals/ groups</li> <li>The PAPs affected by land acquisition</li> <li>Communities living in the neighborhood settlements of the project Aol</li> <li>Mukhtars of the settlements</li> </ul>	<ul style="list-style-type: none"> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in Turkish, English and Arabic</li> </ul>	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)
Project preparation and construction	Sharing information on the Project opportunities, activities and processes	<ul style="list-style-type: none"> <li>Local Settlements</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder visits</li> <li>Consultation meetings</li> <li>Focus Group discussions</li> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in Turkish, English and Arabic</li> </ul>	As the milestones of the project are completed	When needed	Contractor (for implementation)  DGII PIU (for supervision, including all process monitoring)
		<ul style="list-style-type: none"> <li>All Stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>E-mail to external stakeholders</li> <li>Online meetings</li> <li>Consultation meetings</li> </ul>	As the milestones of the project are completed	When needed	Contractor (for implementation)  DGII PIU (for supervision, including all process monitoring)
Construction	Disclosure of the final documents of the Project	<ul style="list-style-type: none"> <li>All Stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>E-mail to external stakeholders</li> </ul>	At the beginning of the construction phase	At the beginning of the	DGII

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Project Stage	Topic of Consultation / Message	Target stakeholders	Method / Tool	Timetable	Frequency	Responsibilities
					construction following the plans are approved	
Operation	<b>Disclosure of the E&amp;S instruments for the Project operation phase:</b> ESIA & ESMP SEP including Grievance Mechanism (GM)	<ul style="list-style-type: none"> <li>Governmental bodies</li> <li>Local Governmental bodies</li> <li>DGII workers</li> <li>Vulnerable/disadvantaged individuals/ groups</li> <li>Municipalities</li> <li>Local sector</li> <li>NGOs</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>E-mail to external stakeholders</li> <li>Letter/post</li> </ul>	After the updated plans are approved	As documents are updated or changed	DGII & Türkiye State Railways (TCDD)
		<ul style="list-style-type: none"> <li>Vulnerable/ disadvantaged individuals/ groups</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder visits</li> <li>Consultation meetings</li> <li>Focus Group discussions</li> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in Turkish, English and Arabic</li> </ul>	After the updated plans are approved	As documents are updated or changed	DGII & Türkiye State Railways (TCDD)
Operation	Sharing information on the Project opportunities and activities	<ul style="list-style-type: none"> <li>Affected Stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder visits</li> <li>Consultation meetings</li> </ul>	As the milestones of the project are completed	When needed	Türkiye State Railways (TCDD)
		<ul style="list-style-type: none"> <li>Other interested parties</li> </ul>	<ul style="list-style-type: none"> <li>DGII Website</li> <li>E-mail to external stakeholders</li> <li>Online meetings</li> </ul>	As the milestones of the project are completed	When needed	Türkiye State Railways (TCDD)
Operation	Community health and safety information meetings for local residents	<ul style="list-style-type: none"> <li>Vulnerable/disadvantaged individuals/ groups</li> <li>Communities living in the neighborhood settlements of the sub-project routes</li> <li>Mukhtars of the settlements</li> </ul>	<ul style="list-style-type: none"> <li>Stakeholder visits</li> <li>Consultation meetings</li> <li>Focus Group discussions</li> <li>Letter/post in Turkish, English and Arabic</li> <li>Posters/flyers in Turkish, English and Arabic</li> </ul>	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	Türkiye State Railways (TCDD)

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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 affected by or interested in the Project, at least on a quarterly basis. These meetings will provide detailed project information and allow stakeholders to ask questions and share their opinions. We will ensure that stakeholders are kept informed with updated information at each stage of the Project, including current developments, and their feedback will be documented.

To inform local communities about the potential impacts of the project information will be provided. Additionally, consultation meetings will be held with affected businesses, such as a coal storage facility and a parking lot, to update them on Project developments and the resettlement/relocation process. Stakeholder opinions and expectations will be addressed during these processes.

For women, focus group discussions will be carried out beside the consultation meetings.

For the Project community health and safety announcements, for Syrian refugees, posts, letters, posters will be prepared both in Turkish and Arabic.

Seasonal workers in the agricultural areas of the region who generally live in tents or cottages have been included under the disadvantaged/ vulnerable groups. These groups will be included in the consultation activities during the project to inform about the project's communication channels and grievance mechanism.

**Consultation meetings:** 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.

**Focus Group Discussions:** Focus group discussions will be held to engage specific sections of the community that may require special attention in consultation, including women/women-headed households, the elderly, disabled individuals. 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 Turkish, Arabic, and any other required languages.

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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. 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 have these transportation infrastructures handed over are among the roles and responsibilities of DGII.

Çukurova Region and İskenderun Bay Railway Connection 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 within the scope of railway management.

DGII will implement a Project Grievance Mechanism to ensure that it is responsive to concerns and complaints from affected stakeholders and communities.

DGII, its Consultant and the Contractor will accept comments and complaints regarding the Project, and those who submit their comments or complaints will have the right to request that their names be kept confidential.

Complainants can always take legal action in accordance with Turkish laws and regulations.

DGII will monitor the handling of complaints and ensure that they are addressed appropriately within the deadlines specified under the mechanism presented below.

DGII will also regularly report to the public on the implementation of the Grievance Mechanism while protecting the privacy of individuals.

DGII will establish a PIU to manage and monitor the GM, SEP, the execution of the land preparation and construction works within the scope of the Project.

Construction Contractor will implement the SEP & GM.

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.

Tables of 8, 9 and 10 below set out the identified roles and responsibilities for both the contractor and DGII in executing and managing the Project's stakeholder engagement action plan. In addition, roles and responsibilities of the Supervision Consultant is presented in the Table 11.

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**Table 11. Roles and Responsibilities for Stakeholder Engagement Action Plan**

Responsible Party	Responsibility
DGII PIU	<p>DGII PIU is legally obliged to continuously monitor and be informed about all disclosure activities conducted under 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 Hatay. Therefore, DGII PIU will ensure that Project staff are present both at Ankara and on 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 &amp; 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/LRP activities.</p>
Construction Contractor	<p>Fulfillment of all requirements of the SEP and GM Procedure.</p> <p>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>
Supervision Consultant	<p>Supervise and ensure that the SEP is implemented correctly.</p> <p>Prepare and submit regular environmental and social monitoring reports to the DGII.</p> <p>Support stakeholder engagement activities and ensure contractor addresses community concerns.</p> <p>Monitor the implementation of the Grievance Mechanism and ensure complaints are resolved promptly.</p> <p>Facilitate communication between the DGII, contractor, communities, and other stakeholders.</p>

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

**Table 12. Roles and Responsibilities of the Responsible Parties of the DGII**

Staff	Responsibility
DGII PIU (Ankara based)	<p>Project Manager</p> <p><b>Integration of Stakeholder Engagement into Management Systems:</b></p>

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Staff		Responsibility
		<p>Ensures that stakeholder engagement activities are seamlessly integrated into environmental and social management systems.</p> <p>Reports on the progress and results of stakeholder engagement to senior management provides feedback to relevant SEP and GM personnel.</p> <p><b>Facilitating and Supervising the Social Team:</b></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&amp;ESMP&amp;SEP document.</p> <p>Supervises the implementation of grievance mechanisms and stakeholder engagement procedures, monitors compliance and performance.</p> <p><b>Collaboration and Coordination:</b></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><b>Documentation and Reporting:</b></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><b>Continuous Monitoring and Improvement:</b></p> <p>Monitors and 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><b>Compliance with Legal and Ethical Standards:</b></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><b>Communication and Transparency:</b></p> <p>Ensures that a workflow is in place that promotes a culture of transparency and open communication, both internally and externally.</p>



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Staff		Responsibility
		Ensures that stakeholders are provided with clear and accessible channels to voice their complaints and concerns and ensures that these channels are communicated.
	Environment Specialist	<p>Coordinating the EHS trainings on environmental issues to relevant project personnel including the Contractors' workers.</p> <p>Ensuring the coordination of the conduct of environmental investigations, monitoring and inspections and evaluation of results regarding the implementation of related ESMP.</p> <p>Reviewing and analyzing environmental accidents</p> <p>Ensuring immediate reporting to the Bank any incident or accident related to the Project that has or may have significant adverse effects on the environment,</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>
	OHS Specialist	Ensure that the implementation of measures on the occupational health and safety policies is tailored to the specific risks of the high-speed rail project.

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Staff		Responsibility
		<p>Conduct comprehensive risk assessments to identify potential hazards during construction, operation, and maintenance phases.</p> <p>Ensure compliance with local, national, and international safety standards and regulations.</p> <p>Ensure to implement the OHS training programs for employees, contractors, and stakeholders involved in the project.</p> <p>Investigate accidents, incidents, and near-misses to determine root causes and implement preventive measures.</p> <p>Ensure that the emergency response plans, including evacuation procedures, drills, and first aid readiness are implemented.</p> <p>Perform regular site inspections to monitor adherence to safety protocols and address non-compliance issues.</p> <p>Oversee the provision, use, and maintenance of Personal Protective Equipment (PPE) for workers.</p> <p>Identify and implement opportunities for enhancing workplace safety and reducing risks throughout the project lifecycle.</p>
	Public relation/stakeholder engagement specialist	<p>Stakeholder Engagement Specialist</p> <p>Keeps the SEP document up to date, revises it as 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</p>

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Staff		Responsibility
		<p>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 13. Roles and Responsibilities of the Responsible Parties of the Contractor**

Staff		Responsibility
Contractor	Project Manager	<p>Ensures smooth implementation of stakeholder engagement activities.</p> <p>Reports to DGII on the progress and results of stakeholder engagement and 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 team in accordance with legal requirements and the requirements set out in the Project's ESIA&amp;ESMP&amp;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 and 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</p>

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Staff		Responsibility
		complaints and concerns and that these channels are communicated.
	Environment Lead	<p>Coordinates and provides training on EHS environmental issues to relevant project personnel, including contractors' employees</p> <p>Evaluates the results of environmental investigations, monitoring and audits, and the implementation of relevant ESMP</p> <p>Ensures that environmental accidents are investigated and analyzed and reports to DGII ES</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>
	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>
	OHS specialist	<p>Implement measures related to occupational health and safety policies adapted to the specific risks of the high-speed train project.</p> <p>Conducts comprehensive risk assessments on site to identify potential hazards during construction, operation and maintenance phases.</p> <p>Provides improvements to ensure compliance with local, national and international safety standards and regulations.</p> <p>Provides OHS training programs for employees, contractors and stakeholders involved in the project.</p> <p>Reports accidents, incidents and near-accident situations to identify root causes and implement preventive measures.</p> <p>Provides training on emergency response plans, including evacuation procedures, drills and first aid preparation.</p>

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Staff		Responsibility
		<p>Conducts regular site inspections to monitor compliance with safety protocols and address non-compliance issues.</p> <p>Provides provision, use and maintenance of Personal Protective Equipment (PPE) for employees and provides necessary training.</p> <p>Identifies and implements opportunities to increase workplace safety and reduce risks throughout the project life cycle.</p>
	Archaeologist	<p>Provides necessary training to workers on potential historical or cultural sites at the project site.</p> <p>Monitors compliance with local, national and international regulations regarding the protection of cultural heritage.</p> <p>Supervises excavation and construction activities to identify and reduce potential impacts on archaeological sites.</p> <p>Develop and implement strategies to minimize construction impacts on designated cultural heritage sites.</p> <p>Document and catalog artifacts or findings uncovered during construction activities.</p> <p>Collaborate with local authorities, cultural heritage organizations and indigenous communities to address concerns and ensure compliance with cultural preservation goals.</p> <p>Prepare detailed reports on archaeological findings and make recommendations to manage cultural heritage risks.</p> <p>Conduct training sessions for construction workers to increase awareness of cultural heritage sensitivity and reporting procedures for discoveries.</p> <p>Create and implement protocols to address unexpected discoveries of cultural or historical significance during construction.</p> <p>Work with engineers and project managers to adjust construction plans as necessary to protect important archaeological resources.</p> <p>Serve as liaison between construction crews and cultural heritage authorities to ensure smooth coordination.</p>

**Table 14. Roles and Responsibilities of the Responsible Parties of the Supervision Consultant**

Staff		Responsibility
Supervision Consultant	Social Specialist	<p>The Social Specialist will be responsible for ensuring that the proposed design incorporates the findings from and is consistent with the project's ESIA, ESMP, RP and LMP as it relates to socio-economic and cultural factors that shape local communities in the area of impact, incorporating issues such as land acquisition, resettlement, livelihoods, labor management/working conditions and community health and safety.</p> <p>The Social Specialist will ensure that engagement activities with stakeholders are carried out in line with the project Stakeholder Engagement Plan (SEP) (considering prevailing Covid-19 restrictions) and that stakeholders are made aware and have access to the project's grievance mechanism. The specialist will oversee labor issues including worker grievances in</p>

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Staff		Responsibility
		line with LMP. During construction supervision, the Social Specialist will monitor and report on project performance as to social outcomes in accordance with the implementation requirements of the ESIA, ESMP, RP, LMP and SEP.
	Environmental Specialist	The Environmental Specialist will be responsible for ensuring that the proposed design incorporates the findings from and is consistent with the project's ESIA and ESMP as it relates to environmental issues, including the protection of biodiversity through mitigation measures proposed by these documents and the gathering of additional data on biodiversity and similar issues that remain pending and did not inform the existing design, as explained in the ESIA. During construction supervision, the Environmental Specialist will monitor—and report accordingly—the environmental performance of the project as it relates to the implementation requirements of the ESIA, ESMP, and associated sub-management plans, including site-specific ESMPs adopted by contractor(s).
	Biodiversity Specialist	The Biodiversity Specialist will be responsible for ensuring that the ESIA and ESMPs and the respective sub-management plans (particularly those related to biodiversity) are duly implemented on site. This specialist can be assigned in the team on a part-time basis provided that he/she is present on the site when the activities can pose risk to sensitive areas with respect to biodiversity and at critical times such as migration and breeding seasons of the protected species, as will be identified in the respective biodiversity action plan and referring to the proposed construction schedule.
	OHS Specialist	The OHS Specialist will be responsible for assisting the design review process in proposing risk mitigation measures to ensure the design safety in the project infrastructure consistent with best industry practices, and preparing the required bidding OHS documents, which will be agreed with DGII/PIU. During construction supervision, the OHS Specialist will be responsible for managing and monitoring the occupational health and safety measures adopted at the project level in line with national and World Bank Guidelines (EHS, ESF, etc.), and for carrying out risk assessments to determine and mitigate possible OHS risks during construction.
	Archeologist	The Archeologist will assist the design review process in proposing risk mitigation measures to manage the project's exposure to cultural heritage sites and other sites of cultural value that must be preserved and protected. During the construction supervision phase, the Archeologist will oversee contractor practices as regards cultural heritage protection and assess and help minimize risks accordingly, consistent with the engineering design and the provisions of the ESIA, ESMP, and associated sub-management plans.

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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 which will be carried out by Contractor as described in this SEP and the Table below. 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.

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.

Table 15 summarizes the KPIs and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

**Table 15 KPIs of the SEP Monitoring**

Key Performance Indicators	Monitoring Method	Monitoring Frequency	Reporting Frequency	Responsible Party
<ul style="list-style-type: none"> <li>All trainings in the training plan have been implemented on time</li> <li>Ensuring that all employees participate in training (100%)</li> <li>Zero (0) non-compliances encountered in the workflow process</li> </ul>	<ul style="list-style-type: none"> <li>Training records</li> <li>Observation of the personnel behavior</li> <li>Internal audits and reports</li> </ul>	Monthly	Monthly	Contractor
		Monthly	Semi-annually	DGII
		Quarterly	Quarterly	Contractor
<ul style="list-style-type: none"> <li>%60 participation of the stakeholders to the meetings</li> <li>Performing all trainings planned in the training program</li> </ul>	<ul style="list-style-type: none"> <li>Meeting records</li> <li>Participation list</li> <li>MoM of the disclosure meetings</li> </ul>	Quarterly	Quarterly	DGII Contractor
<ul style="list-style-type: none"> <li>100% informed personnel</li> </ul>		Quarterly	Quarterly	DGII Contractor

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



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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.

## 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.

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

Complaints submitted to CİMER are forwarded to DGII and relevant units through official channels and their solutions are followed.

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 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. This can be done by

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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 YIMER are given below.

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

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## 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.

DGII will also oversee the monitoring of corrective actions taken to resolve these complaints. 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:** [elifnur.kara@uab.gov.tr](mailto:elifnur.kara@uab.gov.tr), [igorkem.gokmen@uab.gov.tr](mailto:igorkem.gokmen@uab.gov.tr), [hazal.babur@uab.gov.tr](mailto:hazal.babur@uab.gov.tr)
- **Contact persons:** Elifnur Kara, 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** - *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. (See Appendix-1)*
- **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 of the PIU (including stakeholder engagement and occupational health and safety specialists) of the DGII PIU, respective specialist of the Supervision Consultant and Contractor through its Community Liaison Officers (CLOs).

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 Social Specialist and Community Liaison Officer (CLO) of the Contractor on site will be primarily responsible for grievance management as well as Contractors' social staff.

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. CLOs will be proficient in using local languages such as Arabic, given the presence of a refugee population in the region.

## 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<sup>3</sup>) should also be provided to the complainant.

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.

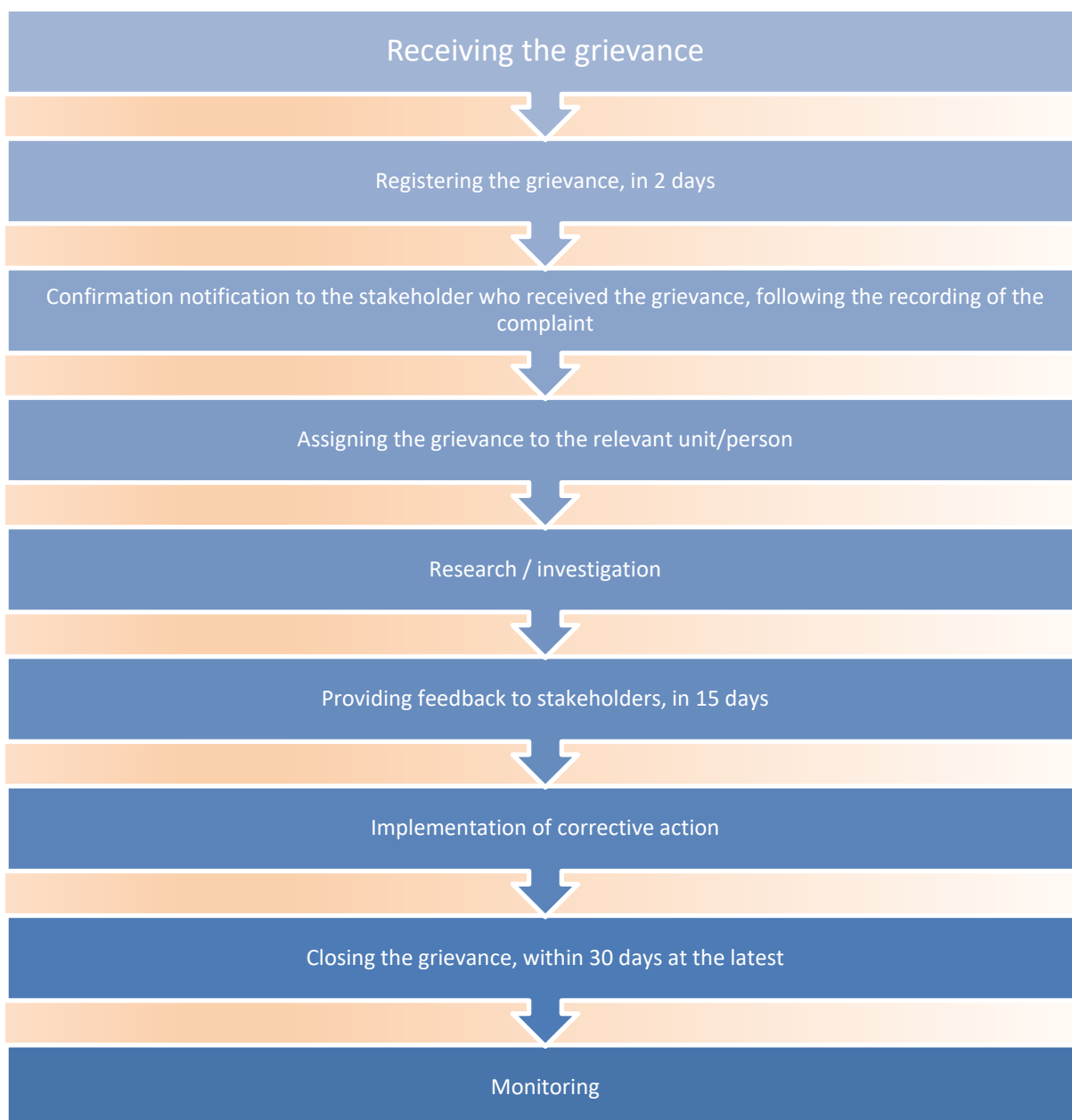
The potential list of grievance categories includes, but is not limited to, the following:

1.	Access Issues	10.	Employment
2.	Communication	11.	Impact on Livelihood
3.	Damage to Environment	12.	Land Acquisition: Compensation
4.	Dust, Noise and Vibration	13.	Livelihood Restoration
5.	Marine Resources/Fisheries	14.	Local Authority Demands
6.	Health and Safety	15.	Route Selection Reinstatement
7.	Road Safety	16.	Archeology and Cultural Heritage
8.	Damage to Private Assets	17.	GBVH and Discrimination

<sup>3</sup> Available at: <https://aygm.uab.gov.tr/uploads/pages/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gel/sikayet-formu-cukurova.pdf>

9.	Damage to Public Assets	
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GBV, SH/SEA 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.



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.

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### 8.6.1 Handling Sexual Exploitation and Abuse/Sexual Harassment Issues

Managing grievances related to sexual exploitation or abuse (SEA), sexual harassment (SH), and other forms of gender-based violence (GBV)<sup>4</sup> requires a different approach than 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 mechanisms<sup>5</sup>.

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 RLIP. When individuals or groups raise these kinds of sensitive issues, the responsible RLIP PIU personnel will ensure that these grievances are filed safely and confidentially in the GM. The RLIP 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 laws<sup>6</sup> 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 officers

<sup>4</sup> *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.

*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.

<sup>5</sup> Interim Technical Note, Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed projects, World Bank, April 2020.

<sup>6</sup> The laws in force in Turkey related to SEA/SH issues are: (i) Constitution of the Republic of Türkiye, (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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handling cases will be trained on the impacts of SEA/SH on survivors, trauma, communication with survivors, service providers, their duties, and relevant legal regulations. Staff supporting SEA/SH-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/SH-related grievances, as survivors of SEA/SH 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/SH cases without being publicly identified, including anonymous complaints, protecting the information about a SEA/SH allegation -particularly the identity of the survivor or any other individuals reporting such cases- will be applied to the SEA/SH complaints and responsible persons will be trained about these procedures.

**Survivor's safety:** Survivors of SEA/SH 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 ŞÖNİM) 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 PIU will be trained on how to deal with the handling, management and disclosure of SEA/SH 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/SH issues for employees/employees or external stakeholders and have confidential reporting with secure and ethical documentation and management of SEA/SH issues.

Additionally, the DG will have the awareness and functioning to promptly take action (within 2 business days) to promptly report any SEA/SH 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/SH 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.

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.

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Unless the case requires mandatory reporting under national laws, for incidents of sexual exploitation/abuse, sexual harassment (SEA/SH) 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 basic<sup>7</sup> necessary information. This information will then be conveyed to the social specialist/SEA/SH focal point at the PIU and World Bank 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 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 project-affected persons (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.

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<sup>7</sup> 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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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 have the goal of 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.
- 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 the complaints from workers and subcontractor employees, collaborating with relevant departments, workers' representative 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: Application Form<sup>8</sup>

CUKUROVA REGION AND ISKENDERUN BAY RAILWAY CONNECTION 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
Şikâyet Konu Alanın Koordinatları / Coordinates of the area subject to complaint		
Arazi parsel numarası (Şikâyet arazi konulu ise) / Land Parcel Number (If complaint is related to land)		
<b>ŞİKÂyet SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO</b> Şikâyet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kendisine geridönüş 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		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
<b>ŞİKÂyet DETAYLARI / DETAILS OF COMPLAINT</b>		
Şikâyet Konusu / Complaint		
Şikâyet sahibi tarafından talep edilen çözüm / Solution requested by the Complainant		
Şikâyeti Alan Yetkilinin Ad Soyad ve İmzası / Name Surname and Signature of the Registerer Complainant		Şikâyet Sahibinin Ad Soyad ve Name Surname and Signature of

<sup>8</sup> Available at: <https://aygm.uab.gov.tr/uploads/pages/dunya-bankasi-turkiye-de-demiryolu-lojistikini-gel/sikayet-formu-cukurova.pdf>

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## Appendix-2: Sample Consultation Form (for stakeholder participation meeting(s))

	İstişare tarihi: Consultation date:	İstişare yeri: Consultation location:	İstişare konusu: Consultation subject	İstişare saati: Consultation time:	Toplam katılımcı sayısı: Total number of participants:
No	Katılımcı adı soyadı: Participant name and surname	Kurum / firma: Locality/ Institution/company:	Pozisyonu/mesleği: Position/profession:	E- mail/Telefon: E- mail/Phone:	İmza Signature
1					
2					
3					
4					
5					
6					
List of information /documents shared					
Project representation					
Minutes of consultations					
List of issues/ questions					
Responses					
Conclusions and recommendations					
Consulting officer name and surname					

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### Appendix-3: HHS and CLS Site Photos

It has been presented as a separate document.

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## Appendix-4: Stakeholder Consultation Data

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## Appendix-5: Frequently Asked Questions

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