

AYGM

HALKALI - ISPARTAKULE - CERKEZKOY RAILWAY LINE

Stakeholder Engagement Plan

FINAL



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1 INTRODUCTION

1.1 THE PROJECT

- 1.1.1. The Turkish General Directorate of the Infrastructural Investment (AYGM) intends to construct a new high-speed railway line from Halkali to Ispartakule and from Ispartakule to Cerkezkoy (herein referred to as 'the Project'), in two different tenders and sections. The Project will be located within the region of Istanbul and province of Tekirdag (the land upon which the railway is to be built is herein referred to as 'the Site'). Once operational the Project would be operated by TCDD & TCDD Taşımacılık (TCDD Transport).
- 1.1.2. The Project will provide passenger and freight services connecting Istanbul (at the existing Halkali Station) to the district of Cerkezkoy and will link to the under-construction Cerkezkoy-Kapikule railway, which is partially funded by the European Union (EU). The Project, together with the construction of Cerkezkoy-Kapikule railway, will be part of the Trans-European Transport Network (TEN-T) connecting to Turkey's European border (at Kapikule). The Project and the Cerkezkoy-Kapikule railway will together form one integrated railway system with full interoperability.
- 1.1.1. The European Bank for Reconstruction and Development (EBRD) and the Asian Infrastructure Investment Bank (AIIB), collectively called the 'Lenders', are considering financing components of the Project, specifically the construction of the railway between Ispartakule and Cerkezkoy.
- 1.1.2. A detailed description of the Project is provided in **Chapter 2: Description of the Project** of the **Environmental and Social Impact Assessment (ESIA)**. In summary, the Project will consist of:
- A new double track 9km line (i.e. two new lines) between Halkali Station and Ispartakule Station. In order for the Project to pass under the proposed Kanal Istanbul a 6km twin-bored tunnel will be constructed in this section. The twin-bored tunnel will contain two high-speed tracks with one line for each direction (though bi-directional operation will also be possible, if necessary). The twin-bored tunnel tracks will be suitable for use by both conventional and high-speed trains. Conventional trains will re-join the existing railway prior to Ispartakule Station;
 - A new double track 67km line from Ispartakule to a location adjacent to the east of Cerkezkoy Station (approximately 1km from the centre of Cerkezkoy);
 - Modification of existing infrastructure, but not buildings, at the 3 existing stations (Halkali (0km from Halkali), Ispartakule (9km from Halkali) and Çatalca (76km from Halkali)), including the provision of footbridges, platforms and additional tracks;
 - New ancillary structures, inclusive of bridges, viaducts, tunnels, overpasses and underpasses;
 - Supporting power supply systems, inclusive of overhead lines and substations; and
 - Supporting electrification, signalling and control systems.
- 1.1.3. The Project, in comparison to the existing railway, would see the following changes to trains per hour by the forecast year of 2041:
- Halkali – Çatalca:
 - An 80% increase in passenger trains, with no change in freight train numbers.
 - Çatalca – Cerkezkoy:
 - An 80% increase in passenger trains, and a 45% increase in freight trains.

1.2 PROJECT NEED

- 1.2.1. The principle need for the Project is to increase the freight and passenger rail capacity in the strategically critical area of Thrace. The area is critical as a European-Asian meeting point of the European rail network and, under future growth scenarios, is set to become an increasing bottleneck unable to meet the demand of future populations.
- 1.2.2. The Project is a response to key transport sector policies and strategic infrastructure initiatives which are summarised in **Chapter 2: Description of the Project** of the **ESIA**.

1.3 AIMS OF THE PROJECT

- 1.3.1. The requirements for the project are associated with socioeconomic, demographic and infrastructure demands forecasted for Turkey as well as commitments for trans-national infrastructure policies. The Project objectives are as follows:
- Contribute towards the achievement of:
 - Enhancement of the sustainability and safety of the national transport system;
 - Improved efficiency of the transport system;
 - Facilitation of a shift from individual to sustainable, accessible and inclusive modes of public transport at the national level; and
 - To facilitate further integration of Turkey with the Single European Transport Area.
 - Solve the capacity constraints of the railway link between the Orient / Eastern Mediterranean Corridor and the indicative extension of the TEN-T railway network of the Anatolian region of Turkey that will maximise the potential for developing a seamless transition from Europe to eastern Anatolia via the third Bosphorus Bridge; and
 - Remove the railway capacity limitations and encourage a modal shift from the current heavy reliance on road transport to railway transportation by:
 - Improving the level of service provided by TCDD Transport to its passengers / customers by reducing travel time and increasing train frequency;
 - Increasing capacity and the level of service for freight customers; and
 - Reducing the passenger and freight traffic loads on highways, thereby reducing the risk of accidents on said highways.

1.4 PROJECT SETTING

- 1.4.1. The Project is located in the north western of Turkey, and within the province of Tekirdag, in the region of Thrace, and the region of Istanbul. These regions are largely urbanised, containing the largest city in Turkey (Istanbul). There is an existing rail network in these regions which has a single-track layout throughout and connects Istanbul (Halkali Station) to the Bulgarian border (Kapikule Station). The Project is broadly aligned with this existing railway from east to west, and is divided into sections as follows:
- Halikali – Ispartakule; and
 - Ispartakule – Cerkezkoy.
- 1.4.2. There is also an established road network connecting the city of Istanbul to the Bulgarian border, as well as providing links to the major port of Tekirdag and Istanbul's international and national airports.

1.4.3. The Project is shown on Figure 1-1.

1.5 STAKEHOLDER ENGAGEMENT PLAN

1.5.1. This Stakeholder Engagement Plan (SEP) is a live public document which sets out AYGM's commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the Project.

1.5.2. Stakeholder engagement and consultation are undertaken with the aims of informing and improving Project decision-making and build understanding by actively involving individuals, groups and organisations in the Project. Stakeholder engagement and consultation helps to:

- Identify and involve all potentially affected groups and individuals;
- Generate a good understanding of the Project amongst those that will be affected;
- Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- Ensure that mitigation measures are appropriate (implementable, effective and efficient); and
- Establish a system for long-term communications between the Project and communities that is of benefit to all parties.

1.5.3. This SEP details engagement undertaken with stakeholders during the early stages of the Project and serves as a guide during future phases. This SEP will need to be revised following Project approval, to inform on-going stakeholder engagement through the various stages of Project development (construction and operation).



Figure 1-1 - Project Location

[FIGURE TO BE INSERTED WHEN DOCUMENT IS IN PDF FORMAT]

2 KEY REGULATIONS

2.1 INTRODUCTION

2.1.1. The purpose of this chapter is to outline the national legislative requirements and Lenders social policy requirements of relevance to stakeholder engagement and consultation.

2.2 NATIONAL REQUIREMENTS

THE CONSTITUTION OF THE REPUBLIC OF TURKEY

2.2.1. 'The Constitution of the Republic of Turkey' is the main document related to the stakeholder engagement and consultation for the Project. The key articles of the Constitution related to stakeholder engagement are listed below:

- Article 25: Freedom of Thought and Opinion – *Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.*
- Article 26: Freedom of Expression and Dissemination of Thought – *Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in 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.*
- Article 56: Health, the Environment and Housing A – *Health Services and Conservation of the Environment – Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.*
- Article 63: Conservation of Historical, Cultural and Natural Wealth – *The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.*
- Article 74: Right of Petition – *Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.*

CIVIL LAW NO. 4721

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

LAW ON THE RIGHT TO INFORMATION NO. 4982

The Law on the Right to Information No. 4982 (Issued 24.10.2003, Official Gazette No. 25269) states that the public has the right to receive information and complain about the progress and implementation of projects. The Act is related to the activities of public institutions and organisations as well as professional organisations with public institution status. The public have to be granted, or denied, access to the requested information or document within 15-30 working days. The Act also contains public grievance procedures in case access is denied. The right to information covers the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

LAW ON THE USE OF RIGHT TO PETITION NO. 4982

- 2.2.3. Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the associated authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of said Law (Issued 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.

EXPROPRIATION LAW NO. 2942

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

REGULATION ON ENVIRONMENTAL IMPACT ASSESSMENT (EIA REGULATION) NO. 29186

- 2.2.5. The Regulation entered into law in 2014, being amended in 2016, 2017 and 2019. The Regulation sets out the procedures and principles of EIA in Turkey and the authority of the Ministry of Environment and Urban Planning to determine rule on the status of EIA projects, or delegate this decision to local authorities. The regulation also covers provision on the topics of EIA reports, EIA procedures and processes, monitoring and inspection regimes, and effective EIA and environmental management procedures.
- 2.2.6. For projects listed in Annex 1 of the Regulation public consultation is required (including the provision of information on the project).
- 2.2.7. A national EIA for the Project was prepared in 2017, as described in **Chapter 4: Lender's Performance Requirements, EU Standards, Legislative and Policy Context** of the **ESIA**. Consultation was undertaken during the preparation of the National EIA for the Project (2017), in accordance with national requirements. This is detailed in Section 3 of this report.

2.3 LENDERS REQUIREMENTS

EBRD

EBRD's Environmental and Social Policy and Performance Requirements and Independent Project Accountability Mechanism

- 2.3.1. All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.
- 2.3.2. The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. PR7 (Indigenous Peoples) and PR9 (Financial Intermediaries) are not applicable, as there are no indigenous peoples within the Project area, and no financial intermediaries are involved. The main PR associated with stakeholder consultation and information disclosure is PR10.
- 2.3.3. The pertinent objectives and requirements of PR10 are presented in Table 2-1.

Table 2-1 - EBRD PR10 Requirements

Objective	Key Requirements
Stakeholder Identification	<ul style="list-style-type: none"> ■ Identify Project affected stakeholders, including disadvantaged or vulnerable groups who are affected or likely affected by the Project; or may have an interest in the Project. ■ Develop and implement a Stakeholder Engagement Plan and Grievance Mechanism.
Information Disclosure	<ul style="list-style-type: none"> ■ Provide stakeholders with access to timely, relevant, understandable, accessible information in a culturally appropriate manner. Including access to: <ul style="list-style-type: none"> ● The purpose, nature, scale and durations of the Project; ● Any risks, potential impacts and mitigation measures; ● Proposed stakeholder engagement process; ● Time and venue of public consultation meetings; and ● A Grievance Mechanism. ■ Where applicable, differentiated measures will be implemented to allow the effective participation of those identified as disadvantaged or vulnerable groups.
Meaningful Consultation	<ul style="list-style-type: none"> ■ Consultation will be in line with the degree of potential project impacts and will: <ul style="list-style-type: none"> ● Begin early and continue throughout the Project lifecycle; ● Be based on prior disclosure and dissemination of information; ● Be free of manipulation, interference, coercion or intimidation; ● Enable meaningful participation; and ● Be documented.
Ongoing Engagement and External Reporting	<ul style="list-style-type: none"> ■ Provide stakeholders, on an ongoing basis, with appropriate information on the Project regarding risks, impacts and grievances raised. ■ Communicate any updates to stakeholders on the Project, including disclosure of updated ESMP if adverse impacts, risks, concerns are identified or raised. ■ Report to the community with frequency that is proportionate to the concerns of affected communities but not less than annually.
Grievance Mechanism	<ul style="list-style-type: none"> ■ Establish a Grievance Mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the Project. ■ The Grievance Mechanism should: <ul style="list-style-type: none"> ● Resolve concerns promptly and effectively; ● Use a transparent, culturally appropriate and readily accessible consultative process; and ● Allow for anonymous complaints to be raised and addressed.

EBRD's COVID-19 Stakeholder Engagement (PR10) Briefing Note 2020

2.3.4. EBRD has developed a guidance presenting recommendations and considerations for continuing effective information disclosure and stakeholder engagement during the COVID-19 pandemic. The guidance provides alternate information disclosure and stakeholder engagement measures considering short-term and long-term consultation methods. The EBRD's key alternative measures for consultation activities have been included in this SEP (e.g. social media, Project leaflet, on-line campaign, telephone engagement, video presentation).

AIIB

2.3.5. The Lenders' Project will be compliant with AIIB's Environmental and Social Framework (approved 2016 and amended 2019). In accordance with AIIB's provisions regarding development partners

policies, the AIIB has elected to apply the EBRD's Environmental and Social requirements on the Project.

3 STAKEHOLDER/COMMUNITY ENGAGEMENTS AND AWARENESS PROGRAMMES

3.1 PREVIOUS STAKEHOLDER CONSULTATION AND ENGAGEMENT CONSULTATION UNDERTAKEN FOR THE NATIONAL EIA

3.1.1. Consultation was undertaken during the preparation of the National EIA for the Project (2017) in 2015 and 2016, in accordance with national requirements. Details of the meetings are provided in Table 3-1.

Table 3-1 - National EIA Public Participation Meetings

Location	Meeting Location	Number of Attendees	Participation Rate	Date
2015				
Istanbul Province, Çatalca District	Çatalca Public Education Center Meeting Room	32	Approximately 20%	08/09/2015
Tekirdag Province, Çerkezköy District	Çerkezköy Public Education Center Meeting Room	27		09/09/2015
Kirklareli Province, Lüleburgaz District	Lüleburgaz April Wedding Hall	46		10/09/2015
Edirne Province, Central District	Edirne Provincial Directorate of Culture and Tourism Deveci Han Cultural Center Meeting Hall	28		
2016				
Istanbul Province, Silivri District	Sinekli Neighborhood Village Guest House	26	Approximately 15%	15/03/2016
Tekirdag Province, Ergene District	Ergene-1 OSB Building Meeting Room	49		16/03/2016
Kirklareli Province, Babaeski District	Babaeski Vocational Technical Anatolian High School Conference Hall	50		17/03/2016
Edirne Province, Havsa District	Havsa District Chamber of Tradesmen and Craftsmen Meeting Hall	33		

Source: AYGM, 2020.

3.1.2. The initial consultation meetings held in 2015 were conducted at locations along the Project (Çatalca, Çerkezköy, Lüleburgaz and the Central District) and organised in accordance with Turkish EIA Regulations, requirements and processes in order to inform local residents about the Project and its potential effects. Leaflets were also prepared in order to provide information about the Project and its likely significant effects and these leaflets were distributed during the meetings. The meetings were chaired by the Provincial Directorates of the Ministry of Environment and Urbanisation. Meeting times and venue selection were coordinated with the Provincial Directorates of the Ministry of Environment and Urbanisation to ensure maximum participation from local residents. The meetings were announced in local and national newspapers, as well as being displayed on provincial websites.

3.1.3. The second round of meetings held in 2016 were used to inform local residents about the Project and its environmental and social impacts. The meetings were performed at different locations (Silivri, Ergene, Babaeski and Havsa Municipalities) to those in the first round of meetings, in order to inform more people located along the existing railway about the Project. The venue and date of the meetings were announced in 4 local newspapers (1 local newspaper for each province) on 11th March 2016.

3.1.4. The main issues raised during both rounds of public participation meetings were in relation to:

- Potential adverse noise effects during the operational phase.
- Potential for beneficial employment opportunities during construction phase.
- Concerns over land acquisition to facilitate the Project, in particular for passenger stations. During the meetings it was reiterated that land acquisition studies will be carried out in accordance with the Expropriation Law.
- Further concerns around the effects of land acquisition on local livelihoods.
- Concerns associated with the provision of crossings along the Project, particularly for agricultural vehicles and animal access. During the meetings it was reiterated that the Project would be fenced and that crossing provisions would be provided (such as bridges, overpasses and underpasses).
- Concerns associated with the divisions of land parcels which may lead to some agricultural lands becoming unusable.

FURTHER PUBLIC INFORMATION MEETINGS

3.1.5. In addition to the National EIA public participation meetings summarised above, TCDD also completed 16 further public information meetings between July 2019 and May 2020. Details of the meetings are provided in Table 3-2.

Table 3-2 - Further Public Information Meetings

No.	Date	Location	Participants
Public Meetings within Project Area (includes meeting attended by representatives of the province of Tekirdag, as the Project is partly located within this province)			
1	30/01/2020	Istanbul	Türk Telekom International Authorities, TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
2	25/07/2019	Tekirdag (meeting took place outside project area, but included here as attended by individual representing the province)	The Ministry of Transport and Infrastructure, TCDD, the Governor, representatives of public institutions and members of the public.
3	23/09/2019	Kirklareli, Edirne and Tekirdag (meeting took place outside project area, but included as attended by individual representing the province)	The Ministry of Transport and Infrastructure, TCDD, the Governor, representatives of public institutions and members of the public.
4	06/11/2019	Cerkezkoy - Luleburgaz	Turkish Electricity Transmission Corporation (TEİAŞ), TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).

No.	Date	Location	Participants
5	24/01/2020	Tekirdag (meeting took place outside project area, but included as attended by individual representing the province)	Thrace Electricity Distribution Corporation (TREDAŞ) Real Estate and Expropriation Manager, TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
Public Meetings Outside Project Area			
6	24/07/2019	Edrine	Ministry of Transport and Infrastructure, TCDD, the local Governor, representatives of public institutions and members of the public.
7	14/10//2019	Babaeski Municipality	Babaeski Science Manager and Science, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
8	16/10/2019	Edrine Municipality	Edrine Municipality Science and Science Works employees, TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
9	04/11/2019	Ağyeri Village	The Mukhtar and members of the public.
10	07/11/2019	Babaeski - Havsa - Edirne	TEİAŞ employees, TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
11	02/12/2019	Kuzucu Village	Kuzucu Village Irrigation Cooperative and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
12	24/02/2020	Trakya Career Fair - Edirne Trakya University	Ministry of Transport and Infrastructure, Trakya University - Kırklareli University - Namık Kemal University - Bandırma 17 Eylül University and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
13	25/02/2020	Trakya Career Fair - Edirne Trakya University	Ministry of Transport and Infrastructure, Trakya University - Kırklareli University - Namık Kemal University - Bandırma 17 Eylül University and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
14	26/02/2020	Edirne	TEİAŞ - TCDD, Contractor (for the under construction Cerkezkoy-Kapikule railway) and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).
15	19/03/2020	Düğüncülü Village	The Mukhtar and members of the public.
16	08/05/2020	Büyükkarıştıran Village	Büyükkarıştıran Village Irrigation Cooperative and Consultant (TPF S.A. in consortium with Eptisa Servicios de Ingenieria, S.L.).

3.2 CONSULTATION UNDERTAKEN FOR THE ESIA AND RAP

3.2.1. A series of consultation meetings were undertaken by WSP during the development of the **ESIA** and the **RAP** in July and August 2020. All the consultation meetings were conducted face to face outside considering the COVID-19 related restrictions, including social distancing and use of masks.

3.2.2. Key vulnerable groups were consulted with to ensure an inclusive engagement approach.

3.2.3. The purpose of these consultation meetings was to:

- Inform the **ESIA** and **RAP**;
- Obtain views and concerns of the local community on the Project; and
- Involve local communities in the decision-making process during the design, construction and operation stage.

3.2.4. The consultation meetings consisted of:

- Governorship and municipality meetings in June and July 2020 with all the affected municipalities along the route of the Project (as detailed in Table 3-3);
- Mukhtar meetings conducted in July 2020 (as detailed in Table 3-4); and
- Focus groups meetings conducted in July 2020 (as detailed in Table 3-5).

GOVERNORSHIP MEETINGS

3.2.5. The meetings with governorships and municipalities were conducted between 29th June 2020 and 1st July 2020.

Table 3-3 - Governorship and Municipality Meetings

No. and Date	Location	Attendees	Summary
1 (29/06/2020)	Başakşehir Governorship	District Governor	The overall Project was explained, and the alignment was shown on a map. The District Governor expressed support for the Project. No concerns were expressed.
2 (29/06/2020)	Başakşehir Municipality	Deputy Mayor	The overall Project was explained, and the alignment was shown on a map. The Deputy Mayor expressed support for the Project. The Deputy Mayor asked a question about the existing railway between Halkali and Ispartakule. It was explained that the existing railway may be retained.
3 (29/06/2020)	Arnavutköy Governorship	District Governor	The overall Project was explained, and the alignment was shown on a map. The District Governor expressed support for the Project. No concerns were expressed.
4 (29/06/2020)	Arnavutköy Municipality	Construction and Urbanisation Manager of the Municipality Deputy Manager	The overall Project was explained. The municipality authorities expressed support for the Project. The municipality authorities noted the presence of a natural gas pipeline crossing the Project in Yeşilbaşır. No concerns were expressed.

No. and Date	Location	Attendees	Summary
5 (29/06/2020)	Çatalca Governorship	Chief Clerk of District Governor Special Secretary of District Governor	Çatalca District was temporarily managed by District Governor of Silivri (until July 2020). The overall Project was explained. The District Governors expressed support for the Project. No concerns were expressed.
6 (29/06/2020)	Çatalca Municipality	Construction and Urbanisation Architect of the Municipality	The overall Project was explained. Concerns were expressed in relation to blasting activities during the construction phase of the Project, notably around Nakkaş and İzzettin.
7 (30/06/2020)	İstanbul Governorship	Deputy Governor TCDD Land Service Deputy Manager	The overall Project was explained, and the alignment was shown on a map. The Deputy Governor expressed support for the Project. No concerns were expressed.
8 (30/06/2020)	Silivri Governorship	Chief Clerk of the District Governor	The overall Project was explained, and the alignment was shown on a map. The Chief Clerk of District Governor expressed support. No concerns were expressed.
9 (30/06/2020)	Silivri Municipality	Deputy Mayor	The overall Project was explained, and the alignment was shown on a map. The Deputy Mayor expressed support for the Project. The Deputy Mayor noted the proximity of the Project to rural communities (Akören, Bekirli, Kurfalı, Küçüksinekli Çayırdere) and stated their views that the construction phase of the Project would not impact said rural communities.
10 (01/07/2020)	Büyükçekmece Governorship and Municipality	Deputy Governor (on behalf of Büyükçekmece District Governor)	The overall Project was explained, and the alignment was shown on a map. Concerns were raised in relation to land acquisition.
11 (01/07/2020)	Çerkezköy Governorship	Çerkezköy District Governor	The overall Project was explained, and the alignment was shown on a map. The District Governor expressed support for the Project. No concerns were expressed.
12 (01/07/2020)	Çerkezköy Municipality	Deputy Mayor Engineer of the Municipality	The overall Project was explained, and the alignment was shown on a map. The Deputy Mayor expressed support for the Project. The Deputy Mayor noted that numerous properties were in close proximity to the Project and that in some instances the Project would result in the divisions of land parcels which may lead to some agricultural lands becoming unusable. The Deputy Mayor recommended that divided land parcels be expropriated.

No. and Date	Location	Attendees	Summary
13 (02/07/2020)	Tekirdag Governorship	Tekirdağ Governor Tekirdağ Deputy Governor Highways Authority, Chief of 18 th Division Tekirdağ Station Chief	The overall Project was explained, and the alignment was shown on a map. The Governors expressed support for the Project. No concerns were expressed.

MUKHTAR MEETINGS

- 3.2.6. The meetings were conducted between 1st July and 5th July 2020 to inform Mukhtars about the Project, conduct a survey about the existing baseline situation of the affected settlements and to obtain their concerns and views about the Project. The dates of the meeting are shown in Table 3-4.
- 3.2.7. The Mukhtars stated that construction noise was the most important concern, followed by construction dust, construction traffic and disruption to roads and access. Most of the land in the settlements is not currently irrigated (with some minor exceptions in Şamlar and Kabakça). All the Mukhtars stated that finding replacement cultivated agricultural land would be difficult. The majority of Mukhtars' stated that the Project would be a contributor to local economy and the Mukhtars' mentioned there would be social benefits associated with improved transportation, particularly in relation to better access to employment and services.

Table 3-4 - Mukhtar Meetings

Date	Mukhtar Meetings
01/07/2020	Bahçeşehir 2. Kısım Mukhtarship (formerly known as Hoşdere)
01/07/2020	Şamlar Mukhtarship (Tatarcık)
02/07/2020	Deliklikaya Mukhtarship
02/07/2020	Ömerli Mukhtarship
02/07/2020	Bahşayış Mukhtarship
02/07/2020	Nakkaş Mukhtarship
02/07/2020	Ferhatpaşa Mukhtarship
03/07/2020	Yeşilbayır Mukhtarship
03/07/2020	Akören Mukhtarship
03/07/2020	Bekirli Mukhtarship
03/07/2020	Küçüksinekli Mukhtarship

Date	Mukhtar Meetings
03/07/2020	Büyüksinekli Mukhtarship
03/07/2020	Çayırdere Mukhtarship
04/07/2020	Karaağaç Mukhtarship
04/07/2020	Kaleiçi Mukhtarship
04/07/2020	İnceğiz Mukhtarship
04/07/2020	Kabakça Mukhtarship
04/07/2020	Kurfallı Mukhtarship
04/07/2020	Gazimustafakemalpaşa (GMKP) Mukhtarship
04/07/2020	İstasyon Mukhtarship
05/07/2020	İzzettin Mukhtarship
05/07/2020	Gökçeali Mukhtarship

- 3.2.8. All Mukhtars surveyed were aware of the Project, with 5 having attended public meetings held by municipalities since 2017. When questioned about their attitude to the Project; 73% of Mukhtars have a positive attitude towards the Project, with a further 18% of Mukhtars being neutral and 9% of not providing a response. The Mukhtars with a positive attitude to the Project based their opinion on the Project being a solution to transportation issues in the area and an opportunity to improve the local economy. The Mukhtars with neutral attitudes towards the Project stated that they thought there would be a contribution to the country's economy, but they did not think it will benefit their community directly. The majority of these Mukhtars were located closer to Çerkezköy than İstanbul.
- 3.2.9. The Mukhtars most common perceived benefits of the Project were quicker commuting (25%) and an improved economy (17%). However, 32% of the Mukhtars stated that they felt that there would be no advantage associated with the Project. This is due to the Mukhtars being unsure of the extent of the expropriation that would be required and the possibility of People Affected Persons (PAPs) being disadvantaged through this process.
- 3.2.10. The majority of Mukhtars (82%) believed that there would be benefits of some description due to the Project, with many respondents (41%) citing multiple potential benefits. Only 18% of Mukhtars thought that there would be no benefits from the Project, these respondents were located in the western half of the Project, further from İstanbul (Gökçeali, İnceğiz, Büyüksinekli and Küçüksinekli). A further 18% cited "other" in their response to the question, and in the corresponding text made a request for a station to be positioned within their communities. These communities are Yeşilbayır, Karaağaç, Nakkaş and Akören.

3.2.11. Although the Mukhtars raised concerns around unemployment in previous questions, this response indicates that many Mukhtars did not expect the Project to bring the benefit of job creation / employment for their communities. Although, they did note the benefit of easier and quicker commuting to outlying areas to gain access to employment.

FOCUS GROUP MEETINGS

3.2.12. As part of the ESIA, a series of 14 focus group meetings were conducted:

- 5 community meetings; and
- 9 meetings with women in the local communities.

3.2.13. The purpose of the focus group meetings was to obtain local concerns and views about the Project and highlight any potential environmental and social issues within the affected areas. In the focus group meetings, the following information was provided:

- An introduction to the purpose and objective of the meeting;
- An overview of the Project;
- A map of the Project; and
- A description of the Grievance Mechanism process.

3.2.14. Table 3-5 provides the results of the focus group meetings.



Figure 3-1 - Community Focus Group Meeting



Figure 3-2 - Women Focus Group Meeting

Table 3-5 - Focus Group Meetings

No.	Date	Location	Attendees	Summary
Community Focus Group Meetings				
1	25/07/2020	Silivri District Büyüksinekli Neighbourhood	Charcoal business owners (2 men).	<p>Prior to this focus group, no Project information was disclosed to the local people other than the official letter sent to the Mukhtar. Key concerns were raised regarding the provision of crossings for agricultural equipment as the current crossings are not large enough or in suitable condition for agricultural machinery. The 2 business owners requested that a new crossing be built which is adequate in size for agricultural machinery.</p> <p>Underpasses and overpasses are included as part of the Project design, with 3 underpasses in Büyüksinekli (at chainages 56+226, 56+495 and 59+845) and 7 underpasses (at chainages 62+008,64+410, 64+935, 66+450, 67+065, 67+535, 68+170, 68+230, 69+012, 70+650 and 71+340) and 2 overpasses (at chainages 63+221, 63+830) in Çayırdere.</p>
2	10/07/2020	Arnavutköy District Yeşilbayır Neighbourhood	Retired households living with family (9 men).	<p>Prior to this focus group, no official announcements were made about the Project to this community. Key concerns were raised regarding access to agricultural lands and health and safety. The households requested that they are directly provided with information regarding the land acquisition process.</p>
3	14/07/2020	Çatalca District Gökçeali Neighbourhood	3 men and 3 women (housewives, an employee, a retired person).	<p>Prior to this focus group, no previous Project information was disclosed to this community. Key concerns were raised regarding the acquisition of agricultural lands and the potential associated effects on local livelihoods.</p>
4	21/07/2020	Silivri District Çayırdere Neighbourhood	Local farmers (27 men, 3 women).	<p>Prior to this focus group, the community had heard about the Project from the Mukhtar and TCDD had previously provided some information. The farmers requested that they are directly provided with information regarding the Project schedule the land acquisition process. The farmers requested further meetings.</p>
5	25/07/2020	Çatalca District Kabakça Neighbourhood	Seasonal agricultural workers (4 men).	<p>Prior to this focus group, no previous official Project information was disclosed to seasonal agricultural workers. No concerns were expressed.</p>

No.	Date	Location	Attendees	Summary
Women Focus Group Meetings				
1	16/07/2020	Arnavutköy District Deliklikaya Neighbourhood	Total of 4 women (all housewives).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding security and land use. The local women advised that have previously had bad experiences during the construction phase of a nearby highway where local grievances were not addressed.
2	27/07/2020	Çatalca District Bahşayıs Neighbourhood	Total of 4 women (1 teacher and 3 housewives).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding the potential impact of the Project on the livelihood of local women and the potential influx of foreign construction workers which could lead to an increased likelihood of gender harassment.
3	18/07/2020	Çatalca District Gökçeali Mahallesi, Yeltepe Mevkii	Total of 4 women (an unemployed person, 2 housewives and a retired person).	Prior to this focus group, the local women had heard about the Project, but no detailed information was disclosed. Key concerns were raised regarding the potential for displacement and land acquisition and effects of the Project on their livelihood alongside the lack of a water supply. The local women requested that they are directly provided with information regarding the land acquisition process. The local women believe that there is no gender equality in the society.
4	20/07/2020	Çatalca District İnceğiz Neighbourhood	Total of 9 women (7 housewives, an unemployed worker and a seasonal worker).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding community security particularly during the construction phase and foreign workers moving in and out of the towns. The local women requested the provision of childcare rooms to be established for women at the train stations.
5	09/07/2020	Çatalca District İzzettin Neighbourhood	Total of 2 women (both housewives).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding dust and emissions from construction activities and security for local women at the stations which are far from the residential areas. The local women stated that only use the train occasionally, such as for access to hospitals and other public facilities. The local women believe that the community will benefit from better access due to the Project.

No.	Date	Location	Attendees	Summary
6	13/07/2020	Çatalca District Kabakça Neighbourhood	Total of 8 women (6 housewives and 2 unemployed persons).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding construction activities, the presence of foreign construction workers and noise associated with the operation of the Project. The women attending this focus group meeting stated that they do not support the Project.
7	20/07/2020	Silivri District Bekirli Neighbourhood	Total of 4 women (all housewives).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding security and safety of local women particularly in relation to foreign construction workers moving in and out of the local areas. The local women request closed-circuit television (CCTV) be installed on the trains to reduce the likelihood of gender harassment.
8	21/07/2020	Silivri District Çayırdere Neighbourhood	Total 10 women (8 housewives, 1 person seeking employment and a retired person).	Prior to this focus group, no official Project information was disclosed to the local women. Key concerns were raised regarding the impact on agricultural lands and the safety and security of children in proximity to the construction activities.
9	21/07/2020	Silivri District Çayırdere Neighbourhood	Total 8 women (6 housewives and 2 retired persons).	Prior to this focus group, the local women had heard about the Project through the Mukhtar. Key concerns were raised regarding the payment of compensation to men (as the main decision makers). They local women requested information on the Grievance Mechanism and process.

ADDITIONAL CONSULTATIONS

3.2.15. Additional consultations were conducted between the 15th February and 19th February 2021 in the communities of Yeşilbayır, Kabakça and Akören:

- Beekeeper: A meeting was conducted with a beekeeper who uses a land parcel within the expropriation corridor for approximately 250 beehives (shown in Figure 3-3); and
- Mukhtars: Meetings were also conducted with the Mukhtars for Yeşilbayır, Kabakça and Akören to inform them about the Project. The Mukhtars did not raise any concern about the Project.

3.2.16. No additional vulnerable groups were identified as part of the additional consultations.



Figure 3-3 - Land Parcel used by Beekeeper

3.3 CONCERNS ABOUT THE PROJECT

3.3.1. Survey respondent to the household survey when asked about the most important issues facing their communities at present, 48% of household survey respondents stated that there were no particular issues. However, of the issues that were mentioned, crime and drug abuse were cited as the key issues (followed by unemployment and alcohol abuse).

3.3.2. A variety of issues were stated when PAPs were asked about their concerns about the Project. The most common concerns stated were as follows:

- Land expropriation;
- Construction noise;
- Train noise;
- Disruption to roads and access; and
- Community safety around the Project.

3.3.3. The Mukhtars also stated construction noise to be the most important concern, followed by construction dust, construction traffic and disruption to roads and access. There were relatively few respondents who were concerned about longer-term, operational impacts (e.g. train noise, disruption to sense of community, falling house prices due to proximity of rail and loss of rural character) and this may be because the Project will primarily follow the existing railway, with nearby residents being understanding and already being acclimatised to the presence of railway infrastructure, due to living close to the existing railway.

3.3.4. The primary methods that community members use to voice their concerns to the Mukhtars is through phone calls, community meetings and one-to-one meetings. When asked if any individuals/groups in their communities had already voiced their concerns about the Project, the following concerns were raised:

- Details about expropriation price;
- Concerns about loss of land, and if the route of the Project can be changed;
- Requests for a station to be placed in their community; and
- Requests for overpasses / underpasses for cattle and to access charcoal activities.

3.3.5. Concern over the price of expropriated lands was cited during the household surveys, as well as concerns that some grazing areas will be affected, if no crossings were to be provided. The bridges, viaduct and tunnels included as part of the Project will provide locations where the existing railway, vehicles, people and fauna can pass either under or over the Project. Crossings will be provided which are suitable for the use animals. For example, cattle may not use narrow, dark tunnels, so the final design of the animal crossings will be discussed and agreed specifically with grazers as part of the final design. This item is included in the ESAP and this SEP. However, it should be noted that once the surveyor explained the proposed underpasses and overpasses to be introduced as part of the Project, these concerns were substantially reduced.

3.3.6. Some focus group attendees stated their concerns about the financial values of their houses decreasing due to the presence of the tunnel under their land. They had concerns that they would not be able to obtain construction permits to build multi-storey buildings on their land if the tunnel passed beneath their land parcel.

3.4 CONSULTATION UNDERTAKEN DURING THE DISCLOSURE PERIOD

3.4.1. Disclosure stakeholder engagement activities were undertaken by the Turkish General Directorate of the Infrastructural Investment (AYGM) during the 120-day disclosure period for Project. These activities are summarised in the Disclosure Consultation Report, dated December 2021.

4 STAKEHOLDER IDENTIFICATION

- 4.1.1. The purpose of stakeholder identification is to identify and prioritise Project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.
- 4.1.2. As a result of the stakeholder mapping, Project stakeholders are categorised into two main groups:
- **Primary Stakeholders** – the individuals and groups who are affected directly by the Project (such as through the acquisition of land); and
 - **Secondary Stakeholders** – those parties which have influence on but are not necessarily directly impacted by the Project (such as community disturbance).
- 4.1.3. The key stakeholders identified are presented in Table 4-1 overleaf.

Table 4-1 - Key Identified Stakeholders and Methods of Engagement

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
AYGM Senior Management / Internal Stakeholders	Primary	<ul style="list-style-type: none"> ■ AYGM ■ TCDD & TCDD Transport 	This group will directly impact / influence the Project through decisions making at each stage of the Project, and providing sign-off on key documents.	AYGM will communicate monthly through face to face meetings.	AYGM will communicate monthly through virtual meetings.
AYGM PIU	Primary	<ul style="list-style-type: none"> ■ AYGM 	The PIU will directly impact / influence the Project through the appointment of Contractor, and when overseeing the Contractors preparation of the final design and construction of the Project.	<p>Regular consultation with local communities to be undertaken by the Community Liaison Officers (CLOs), with support from the Contractors CLOs.</p> <p>2 CLOs (1 male and 1 female) who will be responsible for implementation of this SEP, by conducting regular consultation with affected communities.</p> <p>The CLOs will have responsibility for the disclosure activities described in this SEP.</p> <p>The CLOs will also conduct regular inspections of records relating to grievances received and their resolution;</p>	CLOs to lead regular consultation with affected communities through virtual meetings. Where internet provision is limited, the CLOs (PIU and/or Contractor, as appropriate) will liaise with the Mukhtars to reach the affected businesses and will undertake small focus groups, in accordance with any current COVID-19 restrictions on the location and maximum number of people who can gather, with 2m social distancing, and use of face masks as a minimum.

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
National Government Authorities	Primary	<ul style="list-style-type: none"> ■ Ministry of Transport and Infrastructure ■ Ministry of Interior ■ Ministry of Environment and Urbanisation (including General Directorate of Land Registry and Cadastre) ■ Ministry of Family, Labour and Social Services ■ Ministry of Culture and Tourism ■ Ministry of Health ■ Ministry of Agriculture and Forestry 	This group has direct influence / impact on the Project through regulatory and permit controls.	<p>AYGM PIU will be required to submit official letters and emails to the relevant authorities as required.</p> <p>AYGM PIU will facilitate face to face meetings with the relevant authorities to discuss regulations, permitting and Project relations.</p>	<p>AYGM PIU will be required to submit official letters and emails to the relevant authorities as required.</p> <p>AYGM PIU will facilitate virtual meetings with the relevant authorities to discuss regulations, permitting and Project relations.</p> <p>AYGM PIU will seek regular guidance from the Ministry of Health in relation to COVID-19.</p>
Local Government Departments	Primary	<ul style="list-style-type: none"> ■ İstanbul Governorship ■ Tekirdag Governorship ■ Başakşehir District Governorship ■ Arnavutköy District Governorship ■ Çatalca District Governorship ■ Silivri District Governorship ■ Çerkezköy District Governorship ■ Büyükçekmece District Governorship ■ Küçükçekmece District Governorship 	This group has direct influence / impact on the Project through regulatory enforcement.	AYGM PIU CLOs will regularly liaise by email and face to face meetings with local municipalities and district governorships on the implementation of SEP, implementation of the RAP and the monitoring of livelihoods of affected landowners and users.	AYGM PIU CLOs will regularly liaise by email and virtual meetings with local municipalities and district governorships on the implementation of SEP, RAP and the monitoring of livelihoods of affected landowners and users.

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
Potential Lenders	Primary	<ul style="list-style-type: none"> ■ EBRD ■ AIIB 	Potential lenders will directly impact / influence the Project through decisions making at each stage of the Project.	AYGM will consult with the potential lenders through virtual meetings, emails and occasional face to face meetings.	AYGM will consult with the potential lenders through virtual meetings and emails.
Local Communities	Primary	<ul style="list-style-type: none"> ■ Affected Communities ■ Landowners ■ Land Users ■ Vulnerable Groups ■ Farmers ■ Halkalı Mukhtarship ■ Firuzköy Mukhtarship ■ Altınşehir Mukhtarship ■ Bahçeşehir 2. Kısım Mukhtarship ■ Şamlar Mukhtarship ■ Deliklikaya Mukhtarship ■ Ömerli Mukhtarship ■ Yeşilbayır Mukhtarship ■ Karaağaç Mukhtarship ■ Bahşayış Mukhtarship ■ Nakkaş Mukhtarship ■ Ferhatpaşa Mukhtarship ■ İzzettin Mukhtarship ■ Kaleiçi Mukhtarship ■ Gökçeali Mukhtarship ■ Inceğiz Mukhtarship ■ Kabakça Mukhtarship ■ Akören Mukhtarship ■ Bekirli Mukhtarship ■ Kurfalı Mukhtarship ■ Büyüksinekli Mukhtarship 	<p>Local individuals and communities will be able to influence the Project both directly and indirectly through providing their views and comments about the Project as part of the consultation processes.</p> <p>Local communities will be informed about the risks arising from construction activities and high speed railway operation and electrification.</p>	<p>AYGM to ensure regular face to face meetings with individuals and communities, including affected Mukhtars to ensure that local communities concerns are understood.</p> <p>The face to face meetings will also be used to ensure all have an understanding of the Grievance Mechanism.</p> <p>AYGM to ensure the Contractor consults local communities during the selection of the construction compound locations.</p> <p>Local communities will be briefed about the impact of high speed railway operation and electrification in terms of safety risks to trespassers and residents of adjacent affected properties during construction and operation. Local communities will also be briefed about the 2m high fencing which will be provided</p>	<p>AYGM to ensure regular virtual meetings and phone calls with individuals and communities, including affected Mukhtars to ensure that local communities concerns are understood.</p> <p>Where internet provision is limited, AYGM will liaise with the Mukhtars to be able to reach the affected individuals and communities and will undertake small focus groups with 2m social distancing.</p> <p>A targeted effort will be made to engage with the communities of Gökçeali, Inceğiz, Büyüksinekli and Küçüksinekli, and their respective Mukhtars, to disclose the benefits of the Project, and share information on the opportunities it will provide.</p>

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
		<ul style="list-style-type: none"> ■ Küçük Sinekli Mukhtarship ■ Çayırdere Mukhtarship ■ Gazi Mustafa Kemal Paşa Mukhtarship ■ İstasyon Mukhtarship 		<p>either side of the high-speed railway. The fencing is as a safety measure to prevent people and fauna having access to the line and will therefore reduce the risk of collisions with trains.</p> <p>The safety, security, and risk of harassment concerns shared by women should be discussed, and the measures to protect their safety, such as the Workers code of conduct and Grievance Mechanism should be explained.</p>	
Local Businesses	Primary	Businesses where their livelihood may be affected as a result of loss of land and / or access to where they conduct their business activities (such as farming, animal husbandry, bee keeping and charcoal business).	Businesses may be affected negatively as a result of the Project due to the land acquisition process and the location of crossings.	AYGM to consult with affected businesses through face to face meetings.	AYGM to consult with affected businesses through virtual meetings. Where internet provision is limited, AYGM will liaise with the Mukhtars to be able to reach the affected businesses and will undertake small focus groups with 2m social distancing.
Local Co-operatives	Secondary	<ul style="list-style-type: none"> ■ Beekeeping: S.S. Istanbul Bee and Bee Products Production and Marketing Cooperative 	Local co-operatives could be involved in providing advice as part of the livelihood restoration measures described Livelihood	AYGM to consult with local co-operatives on potential support that could be provided to PAPs as part of the livelihood restoration	AYGM to liaise through emails, phone calls and/or virtual meetings.

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
		<ul style="list-style-type: none"> ▪ Tekirdag Bee Producer's Union 	Restoration Programme (presented in the RAP).	programme (presented in the RAP).	
Universities and Educational Organisations	Secondary	<ul style="list-style-type: none"> ▪ Istanbul Bilgi University ▪ Istanbul Technical University ▪ Ankara University (existing collaboration) 	Local universities will benefit from the Project through graduate employment opportunities and potential capacity building programmes.	AYGM to liaise with local universities on potential graduate employment opportunities and capacity building, where suitable attending careers fairs and face to face meetings.	AYGM to liaise through emails, phone calls and newsletters regarding potential graduate employment opportunities and capacity building.
Non-Governmental Organisations (NGOs)	Secondary	<ul style="list-style-type: none"> ▪ Union of Chamber of Merchants and Craftsmen ▪ Chamber of Industry and Commerce ▪ CEID (active in gender related issues) 	NGOs could influence the Project both directly and indirectly through consultation with local communities and the facilitation of environmental and social campaigns.	AYGM to liaise face to face with NGOs on social issues such as health, safety, security, local livelihoods, gender-based violence and harassment.	AYGM to liaise through emails, letters and phone calls with NGOs on social issues such as health, safety, security, local livelihoods, gender-based violence and harassment.
Media	Secondary	<ul style="list-style-type: none"> ▪ Radio / newspaper ▪ AYGM website ▪ AYGM Twitter account ▪ AYGM Facebook account ▪ AYGM Instagram account 	The media could influence the Project both directly and indirectly through broadcasts / publications / posts about the Project.	The PIU CLOs will issue regular press releases to disclose Project information. They will also post regular updates on their website.	The PIU CLOs will issue regular press releases and post regular updates on their website to disclose Project information.
Contractor	Secondary	<ul style="list-style-type: none"> ▪ Contractor 	The Contractor will engage directly with local communities, to share information on the construction programme and activities, including: access arrangements, diversions,	Regular consultation with local communities to be undertaken by the	Contractor CLOs to lead regular consultation with affected communities through virtual meetings (and to support the PIU CLOs, where required).

Type	Stakeholder Category	Name	Impact / Influence	Method of Engagement	COVID-19 Method of Engagement
			<p>noisy activities, vibration, dust, safety risks and measures etc.</p> <p>The Contractor's construction workers will indirectly engage with local communities during the construction phase, and this will be managed by the Construction Workers Code of Conduct in the CMP.</p> <p>The Contractor will engage with local communities during the selection of the construction compound locations.</p>	<ul style="list-style-type: none"> ■ Contractors' CLOs (1 male and 1 female) responsible for consultation on temporary land acquisition, providing communities with information on the timing of key construction activities, and identifying and responding to grievances during construction. 	<p>Where internet provision is limited, the CLOs (Contractor and / or PIU, as appropriate) will liaise with the Mukhtars to reach the affected businesses and will undertake small focus groups, in accordance with any current restrictions on the location and maximum number of people who can gather, and with 2m social distancing and use of face masks as a minimum.</p>

5 STAKEHOLDER ENGAGEMENT PROGRAMME

5.1 POTENTIAL ENVIRONMENTAL / SOCIAL EFFECTS

5.1.1. Beneficial environmental and social effects may be inclusive of but not limited to:

- Direct and indirect employment opportunities (for both men and women) resulting in improved local economy;
- Reduced air pollution resulting from modern transport facilities;
- Establishment of community initiatives and programmes; and
- Improved regional access.

5.1.2. Adverse environmental and social effects may be inclusive of but not limited to:

- Construction phase:
 - The relocation and potential loss of livelihoods as a result of land acquisition;
 - Increases in local traffic movements and effects on community rights of way;
 - General community health and safety risks from construction;
 - Visual effects such as from the stockpiling of materials;
 - Increased noise and vibration levels as a result of construction activities, such as from piling, blasting, and tunnel boring;
 - Increased dust levels as a result of construction activities; and
 - Community nuisance and disturbance (including impact on women's safety) resulting from construction workers moving in and out of the Project area.
- Operational phase:
 - Increases in noise levels associated with the trains;
 - Visual effects due to the presence of structures such as bridges and viaducts along the Project;
 - Poor occupational health and safety practices which could potentially lead to accidents among operational workers (slips and falls); and
 - Safety risks arising from high speed railways and electrification, including those associated with trespassing and adjacent land uses.

5.1.3. Therefore, this SEP is developed to address community concerns with regard to key environmental and social effects through the implementation of the stakeholder consultation and information disclosure activities as outlined in Table 5-1.

5.2 STAKEHOLDER CONSULTATION AND INFORMATION DISCLOSURE

5.2.1. The stakeholder consultation and information disclosure will cover the following main activities:

- Timely disclosure of Project information in Turkish to the key stakeholders;
- Informed participation and meaningful two-way consultation with the affected stakeholders; and
- Development and implementation of a Grievance Mechanism to ensure that the affected stakeholders' concerns and issues are addressed.

5.2.2. The Project will have 4 assigned CLOs, 2 PIU CLOs and 2 Contractor CLOs (as described in Table 4-1 above) two females and two males to ensure regular consultation and interaction with affected local communities.

INFORMATION DISCLOSURE ACTIVITIES

5.2.3. In addition to the previous stakeholder consultation and engagement undertaken for the Project (as summarised in Section 3.1). AYGM will disclose relevant information about the Project during the detailed design stage, and then in an ongoing manner as the Project evolves. The information will be provided in Turkish and will cover all the key stages of the Project including the construction and operational phases. At this stage, the following documents will be disclosed for effective stakeholder communication:

- **ESIA** (including the **Environment and Social Management Plan (ESMP)**);
- **Non-Technical Summary (NTS)** of the **ESIA**;
- **Environmental and Social Action Plan (ESAP)**;
- **SEP** (this document);
- **Resettlement Action Plan (RAP)** and **Guide to Land Acquisition and Compensation (GLAC)**;
- **Biodiversity Management Plan (BMP)**;
- **Contractor Management Plan (CMP)**; and
- **Emergency Response Framework (ERF)**.

5.2.4. In accordance with PR10, there will be a 120-day ESIA disclosure period, within which time relevant Project documentation will be available for review. The stakeholder engagement that will be undertaken during the disclosure period is set out in Table 5-1.

CONSULTATION METHODS

5.2.5. The Project will use different consultation approaches and methods for different stages of the Project activities and stakeholder groups. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

- Meetings, such as with the affected individuals and communities, including the affected Mukhtars;
- Telephone calls, letters and emails;
- Information disclosure (as described above);
- Regular Project press releases; and
- Regular consultation with local communities to be undertaken by the CLOs.

5.2.6. In light of COVID-19 situation, the AYGM will liaise regularly with the Ministry of Health in relation to following all the related guidelines in relation to consultation. The consultation methods introduced as part of this SEP will ensure effective consultation during the ongoing COVID-19 pandemic (as detailed in Table 4-1).

5.2.7. Additional information on these approaches and methods are provided in the sections below.

Project Implementation Unit (PIU) Meetings

5.2.8. The PIU will be responsible for the implementation, financial management and overall delivery of the Project as well as the implementation of measures and requirements specified within the Project documentation. The PIU will undertake monthly meetings to:

- Review overall Project activities (concerning both technical, environment, health and safety and financial Project delivery);
- Integrate the provision of services of day-to-day activities at different stages, from preparation to implementation and evaluation including procurement;
- Review management of the construction Contractor and consultants;
- Escalate unresolved issues;
- Discuss common issues related to the Project and overcome any obstacles;
- Discuss employment opportunities;
- Ensure the appropriate implementation of training / information exchange; and

- Hold seminars / workshops to ensure the development of the PIU (particularly with regards to measuring performance indicators).

Regulatory / Technical Meetings

- 5.2.9. During the detailed design and construction stage, communications will be made with the relevant authorities and ministries to discuss regulations, permitting and Project relations.

Community Meetings

- 5.2.10. AYGM will undertake community meetings with the Mukhtars representing affected communities. As part of the consultations undertaken for the **ESIA** and **RAP**, contact information has been obtained in relation to all the Mukhtars of affected communities and district governors / mayors.
- 5.2.11. The CLOs (PIU and Contractor) will undertake monthly consultation meetings with the local community. Local communities will be provided with the Grievance Mechanism as described in Section 6.
- 5.2.12. The CLOs (PIU, Supervision Consultant and Contractor) will keep in regular contact with affected landowners and users throughout the land acquisition process and post-land acquisition to ensure concerns are addressed.

Focus Groups and Workshops (targeting vulnerable groups including women)

- 5.2.13. Vulnerable groups for the Project are identified as:
- **Illiterate PAPs** – The link between illiteracy and social disadvantage and exclusion is well established. Illiterate people may be disadvantaged in their life chances, social and political participation, mental health and personal relationship. Support will be provided to such PAPs, if required, through the RAP.
 - **COVID-19** – COVID levels in Turkey at the time of preparing this RAP are Level 4: Very High. The health of PAPs with COVID-19, in particular those with disabilities, chronic illness and the elderly may be increasing vulnerable due to the impact of the Project.
 - **Water Supply Issue** – Multiple focus group attendees highlighted that they struggle to obtain a water supply for their households from utility authorities and resettled households should be provided with piped water supplies.
 - **PAPs with disabilities and chronic illness** – PAPs are identified with physical disabilities (82), mental disabilities (5) and chronic illness (240), the nature of which was not disclosed. These PAPs who may need to relocate and may find the move difficult or may become increasing vulnerable to Project impacts in terms of their health due to their sensitive physical and wellbeing status.
 - **Location-dependent elderly persons** – A number of households that reside and/or use the land in the expropriation corridor contain elderly persons. The health of some of these elderly persons may be negatively affected by the act of relocation. Further, some use these affected lands for informal livelihood activities (e.g. beekeeping and animal rearing) as they are available and a short walk from their residences.
 - **Informal land users, businesses and residents** – whose land use rights are not recognised by national legislation;
 - **Households who are significantly affected in terms of income and land take by the Project** – The household survey found 53% of PAPs of PAPs surveyed are in a situation where their primary source of income is not sufficient to cover 25% of their monthly income, and that PAPs rely on multiple sources of income for their livelihood. In addition, according to the Mukhtars surveys agricultural income and animal husbandry is very important in the areas. Households who are significantly affected by the Project in terms of their primary income (including those PAPs who have not had regular wage-based income with a job at which they work for more than one year), and/or land take use for agricultural land (including animal husbandry).

- **Prior expropriation** – Households that have been expropriated before under national legislation and have not been compensated to replacement value. Those who are cumulatively impacted by this Project and the under construction Çerkezköy to Kapikule railway.
- **Women headed households** – widowed women with no provision of social security, or, women headed households if they are categorised as 'Poor'.
- **Poor Households** – people that live below the poverty line defined as less than a 1/3 of the minimum wage (minimum wage in Turkey is 2,825.90 TL net per month as of 2021).
- **PAPs taking on the role of primary carer for household member** – Households taking care of at least one member that is elderly, sick or disabled.

5.2.14. Ongoing engagement with vulnerable groups and focus groups will be facilitated by AYGM to ensure minimum impact on these groups. Continual contacts will be also made with vulnerable groups through the Mukhtars.

5.2.15. Table 5-1 below details all the stakeholder engagement activities that will be undertaken.

Table 5-1 - Stakeholder Engagement Activities for the Project

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
Disclosure Phase						
<p>Set up a Project disclosure website, hosted on the AYGM website, with the following:</p> <ul style="list-style-type: none"> ▪ Disclosure documents; ▪ A mini video / webinar which is recorded in Turkish; ▪ A feedback form / form to submit questions; ▪ CLO contact details; ▪ Information on the grievance mechanism; and ▪ Responses to frequently asked questions (to be updated throughout disclosure). <p>This website will be advertised as follows:</p> <ul style="list-style-type: none"> ▪ Notices provided to the governorship offices, municipality offices and mukhtar offices; 	All	<ul style="list-style-type: none"> ▪ Project Leaflets ▪ ESIA (including ESMP) ▪ NTS ▪ SEP (this document) ▪ RAP (including GLAC) ▪ BMP ▪ CMP ▪ ERF 	Immediate	AYGM	<ul style="list-style-type: none"> ▪ AYGM office ▪ AYGM website: https://aygm.uab.gov.tr/ispartakule-cerkezkoy-demiryolu-hatti-projesi 	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ■ Notice boards in governorship offices, municipality offices, and mukhtar offices; ■ Notice boards in community centres, such as schools and mosques; ■ SMS messaging, (which will contain links to the website, PIU CLO contact details and advise as to how to obtain hard copies of disclosure documentation), a database of numbers is already available; ■ AYGM Twitter account, AYGM Facebook account and AYGM Instagram account; and ■ Local newspapers adverts. 						
<p>Allocate 1 male and 1 female PIU CLOs for ongoing Project consultations and provide training to them on dealing with community grievances relating to the Project.</p>	All	<ul style="list-style-type: none"> ■ Project Leaflets ■ Posters ■ NTS ■ SEP 	Immediate	2 PIU CLOs (1 male and 1 female)	<ul style="list-style-type: none"> ■ AYGM office 	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
Hard copies of the GLAC and Project Leaflets to be made available (in person or mailed) to Project affected landowners and land users. To be distributed by the CLOs, and other support staff.	Affected Landowners and Users	<ul style="list-style-type: none"> ▪ GLAC 	Immediate	AYGM Expropriation Department and PIU CLOs, where required	<ul style="list-style-type: none"> ▪ AYGM office 	Completed
<p>Place hard copies of Project documentation as follows:</p> <ul style="list-style-type: none"> ▪ AYGM office, affected governorship offices and affected municipality offices: <ul style="list-style-type: none"> • NTS • RAP <p>The following protocols will be followed to view hard copies:</p> <ul style="list-style-type: none"> ▪ Use of hand sanitiser before and after viewing documents (to be provided at each location); ▪ Face masks to be worn when viewing documents; ▪ Only 1 household to view the documents at a time; and 	All	<ul style="list-style-type: none"> ▪ NTS ▪ RAP (including GLAC) 	Immediate	AYGM (PIU CLOs)	<ul style="list-style-type: none"> ▪ AYGM office ▪ Başakşehir Governorship Office; ▪ Başakşehir Municipality Office; ▪ Arnavutköy Governorship Office; ▪ Arnavutköy Municipality Office; ▪ Çatalca Governorship Office; ▪ Çatalca Municipality Office; ▪ İstanbul Governorship Office; ▪ Silivri Governorship Office; ▪ Silivri Municipality Office; ▪ Büyükçekmece Governorship Office; ▪ Büyükçekmece Municipality Office; ▪ Çerkezköy Governorship Office; ▪ Çerkezköy Municipality Office; and ▪ Tekirdag Governorship Office. 	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ■ 2m social distancing to be maintained when waiting to view the documents. <p>Note: the protocols for viewing documents will be kept under continual review and will be revised according to local COVID-19 restrictions at the time of the activity taking place.</p>						
<p>Place hard copies of Project documentation within each affected settlement, at Mukhtar offices:</p> <ul style="list-style-type: none"> • NTS • GLAC <p>The following protocols will be followed to view hard copies:</p> <ul style="list-style-type: none"> ■ Use of hand sanitiser before and after viewing documents (to be provided at each location); ■ Face masks to be worn when viewing documents; 	All	<ul style="list-style-type: none"> ■ NTS ■ GLAC 	Immediate	AYGM (PIU CLOs)	<ul style="list-style-type: none"> ■ AYGM office ■ Affected Mukhtar offices ■ Halkalı Mukhtarship ■ Firuzköy Mukhtarship ■ Altınşehir Mukhtarship ■ Bahçeşehir 2. Kısım Mukhtarship ■ Şamlar Mukhtarship ■ Deliklikaya Mukhtarship ■ Ömerli Mukhtarship ■ Yeşilbayır Mukhtarship ■ Karaağaç Mukhtarship ■ Bahşayış Mukhtarship ■ Nakkaş Mukhtarship ■ Ferhatpaşa Mukhtarship ■ İzzettin Mukhtarship ■ Kaleiçi Mukhtarship ■ Gökçeali Mukhtarship ■ İnceğiz Mukhtarship ■ Kabakça Mukhtarship ■ Akören Mukhtarship 	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ▪ Only 1 household to view the documents at a time; and ▪ 2m social distancing to be maintained when waiting to view the documents. <p><i>Note: the protocols for viewing documents will be kept under continual review and will be revised according to Covid-19 restrictions.</i></p> <p>A minimum of 3 hard copies of the NTS and GLAC will be retained at Mukhtar offices, and extra copies will be made available if affected people would like to take a copy with them.</p>					<ul style="list-style-type: none"> ▪ Bekirli Mukhtarship ▪ Kurfalı Mukhtarship ▪ Büyüksinekli Mukhtarship ▪ Küçük Sinekli Mukhtarship ▪ Çayırdere Mukhtarship ▪ Gazi Mustafa Kemal Paşa Mukhtarship ▪ İstasyon Mukhtarship 	
<p>Hold virtual public consultation meetings, published on the AYGM websites. With specific meetings for people in the following more significantly affected communities:</p> <ul style="list-style-type: none"> ▪ Firüzköy ▪ Yeşilbayır ▪ Kaleiçi ▪ Gökçeali 	Affected Communities / Businesses	<ul style="list-style-type: none"> ▪ Project Leaflets ▪ ESIA (including the ESMP) ▪ NTS ▪ SEP (this document) ▪ RAP 	Immediate	AYGM (PIU CLOs)	<ul style="list-style-type: none"> ▪ Virtual meetings may be held due to the COVID-19 pandemic. 	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ▪ Kabakça ▪ Akören ▪ Bekirli ▪ Çayırdere 						
<p>In addition to the virtual public meetings, hold a series of small focus groups for people in the following more significantly affected communities:</p> <ul style="list-style-type: none"> ▪ Firüzköy ▪ Yeşilbayır ▪ Kaleiçi ▪ Gökçeali ▪ Kabakça ▪ Akören ▪ Bekirli ▪ Çayırdere <p>The following protocols will be followed for the small focus group meetings:</p> <ul style="list-style-type: none"> ▪ All attendees must register with the PIU CLOs prior to attending; ▪ All focus groups will take place outside, in a shaded area; ▪ Face masks to be worn at all times; 	Affected Communities / Businesses	<ul style="list-style-type: none"> ▪ Project Leaflets ▪ ESIA (including the ESMP) ▪ NTS of the ESIA ▪ SEP (this document) ▪ RAP 	Immediate	AYGM (PIU CLOs)	<ul style="list-style-type: none"> ▪ A series of small focus groups will be held due to the COVID-19 pandemic. <p>Note: the protocols for the small focus groups will be kept under continual review and will be revised according to local COVID-19 restrictions at the time of the activity taking place.</p>	Completed

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ■ The number of attendees must not exceed 10 people per focus group; and ■ 2m social distancing to be maintained. <p>The number of small focus groups will be increased, if necessary, to ensure that all those interested in attending are able to participate.</p>						
<p>Hold a series of small focus groups with affected landowners, land users and local communities on locations of overpasses and underpasses and their suitability for their use by animals as part of the disclosure activities to feed into Contractor’s final design.</p> <p>The following protocols will be followed for the small focus group meetings:</p> <ul style="list-style-type: none"> ■ All attendees must register with the PIU CLOs prior to attending; 	<p>Affected Landowners and Users / Affected Communities / Businesses</p>	<ul style="list-style-type: none"> ■ NTS ■ RAP (including GLAC) ■ Maps (showing potential locations of overpasses and underpasses) 	<p>Immediate</p>	<p>AYGM (PIU CLOs)</p>	<ul style="list-style-type: none"> ■ A series of small focus groups will be held due to the COVID-19 pandemic. <p>Note: the protocols for the small focus groups will be kept under continual review and will be revised according to local COVID-19 restrictions at the time of the activity taking place.</p>	<p>Completed</p>

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ■ All focus groups will take place outside, in a shaded area; ■ Face masks to be worn at all times; ■ The number of attendees must not exceed 10 people per focus group; and ■ 2m social distancing to be maintained. 						
<p>Hold a combination of virtual meetings with households living in proximity to tunnels (within 500m) presenting temporary impacts (noise, vibration, dust etc) and restrictions caused due to tunnel construction on local community.</p> <p>If requested, hold small focus groups in addition to the virtual meetings. The following protocols will be followed for the small focus group meetings:</p> <ul style="list-style-type: none"> ■ All attendees must register with the PIU CLOs prior to attending; 	<p>Affected Landowners and Users / Affected Communities / Businesses</p>	<ul style="list-style-type: none"> ■ Project Leaflets ■ ESIA (including the ESMP) ■ NTS ■ SEP (this document) ■ RAP (including GLAC) ■ Maps (showing potential locations of tunnels and environmental constraints) 	<p>Immediate</p>	<p>AYGM (PIU CLOs)</p>	<ul style="list-style-type: none"> ■ AYGM office and website. ■ A series of small focus groups will be held due to the COVID-19 pandemic. <p>Note: the protocols for the small focus groups will be kept under continual review and will be revised according to local COVID-19 restrictions at the time of the activity taking place.</p>	<p>Completed</p>

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ■ All focus groups will take place outside, in a shaded area; ■ Face masks to be worn at all times; ■ The number of attendees must not exceed 10 people per focus group; and ■ 2m social distancing to be maintained. 						
Prior to Construction, and During Construction						
<p>Implement and undertake RAP, including:</p> <ul style="list-style-type: none"> ■ Appropriate distribution of the RAP and GLAC disclosure (see disclosure phase activities above) ■ Ensure that all affected landowners / users have had the opportunity to review the RAP and GLAC and raise queries (prior to negotiations) 	<p>Affected Landowners and Formal / Informal Users</p>	<ul style="list-style-type: none"> ■ RAP ■ GLAC 	<p>Prior to Construction</p>	<p>AYGM</p>	<ul style="list-style-type: none"> ■ AYGM office ■ Affected governorship offices ■ Affected municipality offices ■ Affected Mukhtar offices 	<p>Part-complete</p>

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<ul style="list-style-type: none"> ▪ Negotiation with landowners and users (formal and informal) to agree entitlements and compensation amounts, in line with the RAP ▪ Continue consultation with PAPs to ensure effective compensation disbursement ▪ Further consultation during legal challenges, if required ▪ Consultation stipulated as part of the grievance mechanism ▪ Consultation to inform update Project schedule and progress ▪ Consultation with PAPs as part of effective RAP monitoring ▪ Final evaluation of RAP implementation (completion audit) 						
<p>Consult with relevant local organisations, co-operatives and social support programmes (such as the Provincial Administrations Agricultural Support Programme) to</p>	<p>Ministry of Agriculture and Forestry</p> <p>Beekeeping: S.S. Istanbul Bee and Bee Products</p>	<ul style="list-style-type: none"> ▪ RAP 	<p>Prior to Construction</p>	<p>AYGM</p>	<ul style="list-style-type: none"> ▪ AYGM office ▪ Affected governorship offices ▪ Affected municipality offices 	<p>Part-complete</p>

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
review and finalise the livelihood restoration assistance packages as described in the Livelihood Restoration Programme (presented in the RAP).	Production and Marketing Cooperative Tekirdag Bee Producer's Union. Chamber of Industry and Commerce Social Assistance Directorate General (SADG) under the Ministry of Family, Labour and Social Services					
Make an online Grievance Mechanism form available to the public.	All	<ul style="list-style-type: none"> Grievance Mechanism (and related forms) 	Prior to Construction	AYGM	<ul style="list-style-type: none"> AYGM website 	Complete
Consult with Ministry of Environment and Urbanisation on obtaining any permits.	Ministry of Environment and Urban Planning	<ul style="list-style-type: none"> ESIA (including the ESMP) 	Prior to Construction During Construction	AYGM & Supervision Consultant & Contractor where required	<ul style="list-style-type: none"> Ministry of Environment and Urban Planning (or consultation through emails / formal letter) 	Part-complete
Consult and collaborate with local emergency services.	Local Emergency Services	<ul style="list-style-type: none"> ERF 	Prior to Construction	Contractor	<ul style="list-style-type: none"> Local Emergency Services (fire stations and police stations) 	Not Started

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<p>Hold a series of small focus groups with the Mukhtars for each affected settlement to provide information on the reasoning behind the provision of stations along the Project.</p> <p>The following protocols will be followed for the small focus group meetings:</p> <ul style="list-style-type: none"> ▪ All attendees must register with the PIU CLOs prior to attending; ▪ All focus groups will take place outside, in a shaded area; ▪ Face masks to be worn at all times; ▪ The number of attendees must not exceed 10 people per focus group; and ▪ 2m social distancing to be maintained. <p>Outcomes/feedback from these small focus groups discussions will be added to the Project website.</p>	Mukhtars (within the affected settlements)	<ul style="list-style-type: none"> ▪ Maps (showing locations of the stations) 	<p>Prior to Construction</p> <p>During Construction</p>	AYGM (PIU CLOs)	<ul style="list-style-type: none"> ▪ A series of small focus groups will be held due to the COVID-19 pandemic. ▪ Note: the protocols for the small focus groups will be kept under continual review and will be revised according to local COVID-19 restrictions at the time of the activity taking place. 	Part-complete
Facilitate focus groups and workshops for affected vulnerable group, and	Vulnerable Groups	<ul style="list-style-type: none"> ▪ Project Leaflets ▪ ESIA (including the ESMP) 	Prior to Construction	AYGM	<ul style="list-style-type: none"> ▪ AYGM office ▪ Affected governorship offices (or similar meeting place) 	Part-complete

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
facilitate ongoing consultation with vulnerable PAPs as part of the implementation of the Livelihood Restoration Programme (presented in the RAP).	(including women)	<ul style="list-style-type: none"> ▪ NTS of the ESIA ▪ SEP (this document) ▪ RAP 	During Construction		<ul style="list-style-type: none"> ▪ Affected municipality offices (or similar meeting place) <p>Note: Virtual meetings or small focus groups (using the protocol outlined in the disclosure focus group meetings), may be held due to the COVID-19 pandemic.</p>	
Formally consult prior to construction to enable them to make arrangements to provide supervision regarding heritage assets.	Istanbul Regional Directorate of Protection of Cultural Heritage / Museum Directorate / Regional Directorate	<ul style="list-style-type: none"> ▪ ESIA (including the ESMP) ▪ Construction Programme 	Prior to Construction During Construction	AYGM & Supervision Consultant & Contractor where required	<ul style="list-style-type: none"> ▪ AYGM office / Regional Directorate Office 	Not Started
Hold consultation meetings about the location of the construction compounds for the Project.	Affected Communities / Businesses	<ul style="list-style-type: none"> ▪ Project Leaflets ▪ ESIA (including the ESMP) ▪ NTS ▪ SEP (this document) ▪ RAP ▪ Maps showing potential locations and environmental constraints 	Prior to Construction	Contractor CLOs	<ul style="list-style-type: none"> ▪ Affected governorship offices (or similar meeting place) ▪ Affected municipality offices (or similar meeting place) <p>Note: Virtual meetings or small focus groups (using the protocol outlined in the disclosure focus group meetings), may be held due to the COVID-19 pandemic.</p>	Not Started

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
Hold consultation meetings about the noise and vibration impacts of the tunnel under the proposed Kanal Istanbul, a minimum of 1 month before tunnel construction commences. Explain the criteria regarding requesting temporary relocation, and the likelihood of this being required based on the detailed construction schedule.	Affected Communities / Businesses	<ul style="list-style-type: none"> ■ Project Leaflets ■ ESIA (including the ESMP) ■ NTS 	During Construction	Contractor CLOs	<ul style="list-style-type: none"> ■ Affected Mukhtars offices <p>Note: Virtual meetings or small focus groups (using the protocol outlined in the disclosure focus group meetings), may be held due to the COVID-19 pandemic.</p>	Not Started
Disclose information about construction access and activities (including diversions, fencing, access, health and safety risks and signs, and map of the new temporary roads and crossings).	Affected Communities / Businesses	<ul style="list-style-type: none"> ■ Project Leaflets 	Prior to Construction During Construction	Contractor CLOs	<ul style="list-style-type: none"> ■ Affected governorship offices (or similar meeting place) ■ Affected municipality offices (or similar meeting place) ■ Affected Mukhtars offices ■ Radio / newspaper ■ AYGM website ■ AYGM twitter account, AYGM Facebook account and AYGM Instagram account 	Not Started
Provide employment advertisements on AYGM and Ministry of Transport websites, on governorship offices bulletin boards and consult with neighbourhood mukhtars	Local Communities PAPs Local Farms Local businesses, e.g. Hadımköy	<ul style="list-style-type: none"> ■ Employment Adverts ■ Local Procurement and Employment Plan 	Prior to Construction During Construction	AYGM Contractor	<ul style="list-style-type: none"> ■ Contractor website ■ Governorship offices notice board ■ Affected Mukhtars offices notice board 	Not Started

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<p>on the Project employment opportunities.</p> <p>Contractor will ensure that opportunities for local workers and businesses are provided (e.g. subcontractors, catering and accommodation) for local workers. They will also help their construction workers find new employment opportunities at the end of the construction phase, including training records and references.</p> <p>Details about employment opportunities and how AYGM will enhance local jobs will be provided in a local employment plan.</p> <p>AYGM will liaise with businesses within local areas to proactively identify job opportunities for PAPs.</p>	<p>Deliklikaya Organized Industrial Zone in Deliklikaya, Ömerli, Istanbul Hezarfen Airfield in Bahşayış, Çatalca Organized Industrial Site in Ferhatpaşa and industrial areas in İstasyon (Çerkezköy).</p>					
<p>Disclose information about electrical safety risks associated with the Project.</p>	<p>Affected Communities / Businesses</p>	<ul style="list-style-type: none"> ■ Project leaflets ■ Letters 	<p>During construction</p>	<p>& Supervision Consultant & Contractor where required</p>	<ul style="list-style-type: none"> ■ Affected Mukhtars ■ Radio / newspaper ■ AYGM website ■ AYGM Twitter account, AYGM Facebook account and AYGM Instagram account 	<p>Not Started</p>

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
Immediately Prior to Operation and During Operation						
Disclose information to schools and communities on the risks associated with high speed trains and electrical safety.	Local Communities (including the schools in those communities)	<ul style="list-style-type: none"> ▪ Leaflets ▪ Advertisements ▪ School visits 	Prior to operation	TCDD&TCDD Transport	<ul style="list-style-type: none"> ▪ Affected Mukhtars ▪ Schools ▪ Radio / newspaper ▪ TCDD & TCDD Transport website ▪ TCDD & TCDD Transport Twitter account, TCDD & TCDD Transport Facebook account and AYGM Instagram account 	Not Started
Disclose information about the Project operation timing, stations information overpasses, underpasses, timetables, health and safety signs.	Public	<ul style="list-style-type: none"> ▪ Station Leaflets ▪ Timetable ▪ Maps 	Prior to Operation	TCDD & TCDD Transport	<ul style="list-style-type: none"> ▪ TCDD & TCDD Transport ▪ Radio / newspaper ▪ TCDD & TCDD Transport Social Media (such as Twitter, Facebook and Instagram) ▪ Train stations notice board ▪ Ministry of Transport website 	Not Started
Post hotline number for health and safety emergency and gender-based violence and harassment at train stations.	Local Communities	<ul style="list-style-type: none"> ▪ Hotline Leaflet 	Prior to Operation	TCDD Transport	<ul style="list-style-type: none"> ▪ Train stations notice board 	Not Started
Post-employment advertisements on TCDD & TCDD Transport and Ministry of Transport websites, on governorship offices bulletin boards and consult with	Local Communities	<ul style="list-style-type: none"> ▪ Employment Adverts ▪ Local Employment Plan 	During Operation	TCDD Transport	<ul style="list-style-type: none"> ▪ TCDD & TCDD Transport website ▪ Ministry of Transport website ▪ Governorship offices notice board ▪ Neighbourhood Mukhtars 	Not Started

Activity	Stakeholders	Information Materials	Timeframe / Frequency	Responsibility	Location	Progress
<p>neighbourhood mukhtars on the Project employment opportunities.</p> <p>TCDD & TCDD Transport will endeavour to provide opportunities for local businesses are provided (e.g. subcontractors, catering and accommodation) for local workers.</p> <p>Information about TCDD Transport's actions in creating local employment opportunities will be provided in a local employment plan, including recruitment process, eligibility criteria etc.</p>						
<p>Monitor RAP activities post construction (during operation).</p>	<p>Affected Landowners and Formal / Informal Users</p>	<ul style="list-style-type: none"> ■ RAP ■ GLAC 	<p>During Operation</p>	<p>AYGM</p>	<ul style="list-style-type: none"> ■ AYGM office 	<p>Not Started</p>

6 GRIEVANCE MECHANISM

6.1 OVERVIEW

- 6.1.1. AYGM understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A project-level grievance mechanism for affected communities is a process for receiving, evaluating, and addressing Project-related grievances from affected communities at the level of the company, or Project.
- 6.1.2. Project-level grievance mechanisms offer companies and affected communities an alternative to external dispute resolution processes (legal or administrative systems or other public or civic mechanisms)¹. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders. Monitoring of grievances will signal any recurrent issues, or escalating conflicts and disputes.
- 6.1.3. AYGM shall implement a Project Grievance Mechanism (as detailed in this Chapter and the **RAP**) to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities. AYGM, Supervision Consultant and the Contractor shall accept comments and complaints associated with the Project and individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Turkey. AYGM shall monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below. AYGM shall also report regularly to the public on the Grievance Mechanism implementation, while protecting the privacy of individuals.

6.2 EXISTING GRIEVANCE MECHANISM

- 6.2.1. Any issues, complaints and requests can be raised by the public through the Communication Centre (CIMER). This is an active 24 hour online national system developed by the Directorate of Communications to keep communication channels between the public and government open whereby issues, complaints and requests can be made by the public at anytime and anywhere. Issues, complaints and requests can be both received and responded to through this online national system.
- 6.2.2. AYGM will implement a series of steps to ensure meaningful implementation of the project-level Grievance Mechanism as set out in Section 6.3.

6.3 THE PROJECT GRIEVANCE MECHANISM PROCESS

- 6.3.1. AYGM will initiate the implementation of a formal project-specific grievance (complaint) procedure during the early stages of the project to receive the affected communities' concerns and views. This Grievance Mechanism procedure is based on the existing Grievance Mechanism using the national CIMER system and is also in line with the PR10 and international best practice.
- 6.3.2. The complaints procedure (shown in **Appendix A**) will be used as a tool to assist the timely and successful resolution of stakeholder concerns, as well as to monitor AYGM, TCDD and TCDD Transport's relationship with the affected community during the different phases of the Project. It is important that the mechanism be impartial, transparent and fair. A summary of complaints and the measures taken to resolve them will be made public on a regular basis, in accordance with PR10.

- 6.3.3. According to the Law on the Right to Information (2004, No. 4982), each person has the right to obtain information or make complaints within the framework of the principles and methods established by the written rules. Requests, suggestions and complaints can be made in writing using the Right of Petition, or online at <https://www.cimer.gov.tr/>. AYGM 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 AYGM, 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. The PIU is assigned to be responsible for this work in AYGM. Applicants are notified in writing, electronically or by fax of the response to their application. If necessary, applicants are also informed of the response by phone.
- 6.3.4. The CIMER system enables stakeholders to communicate directly with AYGM during the construction phase and TCDD & TCDD Transport during the operational phase, but a separate Grievance Mechanism system will be established for the Project in which the stakeholders can receive their responses locally and communicate their complaints. This project-level grievance system will be established within AYGM and implemented and followed by both the PIU and the Contractor during the construction and operation phases. This will ensure that the Grievance Mechanism is more easily accessible for stakeholders and will encourage them to voice any complaints they may have.
- 6.3.5. The recording and follow up of grievances (including environmental issues) will be the primary responsibility of the PIU, with support from the Contractor's CLOs. The PIU will have personnel assigned for the grievance management process both on site and at their Head Office. The PIU will provide a central database, that both the PIU and the Contractor will have access to, and will use to record all grievances and responses.
- 6.3.6. The PIU Social Specialist based at the Head Office and PIU CLOs on site will be primarily responsible for grievance management as well as Supervision Consultant's Social Supervisor and Contractor's Social Lead and CLOs. AYGM will regulate the contractual agreements with the Contractor to ensure that they have 2 CLOs on site who will be responsible for the recording and follow up of grievances. The PIU CLOs and Contractor CLOs will follow the Grievance Mechanism established to record and resolve all complaints from stakeholders, that are within their capacity and/or authority, and will provide responses and follow up with corrective actions . Where required, more complex grievances will be recorded then escalated to AYGM Senior Management for resolution, with support from the PIU CLOs.
- 6.3.7. Contact information will be provided via the Project website, through public information meetings, consultation meetings and Project brochures to raise awareness and offer transparency of how stakeholders can voice their grievances.
- 6.3.8. Any verbal and written complaints will be raised through the contact details that follow. Anonymous complaints can be raised as well. A 'complaint box' will be placed in the affected communities, and posters will be prepared and displayed at key locations within the Project affected communities.
- 6.3.9. Key steps with regard to implementation of the Grievance Mechanism are:
- A Public Grievance Mechanism Paper Form (**Appendix B**) will be disclosed at the Project sites, AYGM district / head offices and with the applicable Mukhtars.
 - All grievances (whether submitted through a grievance form, email, telephone, etc) will be recorded on a grievance log sheet (**Appendix D**) by the CLOs (PIU and Contractor).
 - AYGM Senior Management have the authority to resolve complaints and approve corrective measures in response to public complaints.

- Prior to construction, 2 males and 2 females will be appointed in the CLO positions (4 CLOs in total), 2 in the PIU (1 male and 1 female), 2 by the Contractor (1 male and 1 female). The appointment of the female CLOs on the Project will facilitate women in the local community directly approaching the CLOs in relation to any concerns. The CLOs will have accommodation on, or near the Project, if they do not reside near the Project their accommodation costs will be covered through their employment contracts, thereby enabling them to cover the whole Project.
- Actions to resolve the complaint need to be defined, agreed and assigned to responsible parties. It should be noted that more often than not the CLOs cannot resolve the issue and it will be the responsibility of others such as the PIU Social and Resettlement Specialist, Supervision Consultant's Social Supervisor and Contractor's Social Lead
- All grievances received through direct phone calls, e-mails and face-to-face meetings and/ or communications are registered and CLOs contact the complainant within 2 working days following complaint registration to explain the Project response process for the grievance. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant by the CLOs during this step.
- The CLOs will prepare a grievance resolution form (**Appendix C**) which includes the nature of the grievance, date of its submission, actions implemented to resolve the grievance and date of implementation, or proposed actions to be implemented to resolve the grievance along with the timeline for their completion. The grievance resolution form will be submitted within 20 days of receiving the grievance. The CLOs have 10 working days to investigate and respond to the complaint. If the case requires a more complex investigation, updated information will be provided to the complainant explaining the actions required to resolve grievance, and the likely timeline.
- Upon AYGGM management approval, the outcomes of the grievance resolution form will be communicated to the complainant by the CLOs in accordance with the preferred method of communication specified. The grievance resolution form must be signed-off by the CLOs and the complainant.
- In the case the grievance resolution form identifies proposed actions to be implemented; the CLOs will monitor and follow up to ensure that such actions have been implemented in accordance with the timeline proposed within the grievance resolution form.
- Upon resolving the grievance, a grievance closeout form will be prepared to be signed off by the CLOs and the complainant that will detail the solution that was implemented to resolve the grievance.
- The CLOs will ensure that the grievance forms, grievance log sheet, grievance resolution form and grievance closeout form are always updated and maintained onsite (i.e. Mukhtar offices, construction workers' accommodation, construction compounds, public places within the Project area etc).
- The grievance mechanism allows submission of anonymous and gender-based violence and harassment (GBVH) complaints by community members. AYGGM will also monitor the way in which grievances are being handled by their staff and Contractor(s) and ensure they are properly addressed within deadlines specified on their website. Both the PIU CLOs and the Contractor CLOs will keep a grievance log of all grievances. The Contractors response to grievances will be monitored by the Supervision Consultant, who will advise on corrective actions, such as awareness raising, further training and disciplinary measures. In case of receiving GBVH complaints, an allocated Gender Focal Point will address and raise the issue with AYGGM senior management, and human resources, it will then be investigated, and corrective measures identified. The case will be referred to a relevant service provider (i.e. authorities) in severe cases.

- The CLOs aim to solve each complaint within 10 working days, however, for more complex investigations this can take up to 30 working days. Where required or requested by the complainant, investigations will be escalated to AYGM Senior Management for resolution, with support from the PIU CLO's, and the involvement of a civic representative, such as a Mukhtar. If following these procedures, the complainants is not satisfied with the response to their complaint they may apply to court.

6.3.10. All complaints and grievances will be raised via the following channels during the construction phase:

■ **Telephone:**

- PIU Social and Resettlement Specialist: Murat Yağcı, Tel: 05358228873
- Hotline of AYGM: 03122031000
- PIU Stakeholder Engagement Specialist: Açelya Yenilmez, Tel: 05053841616
- CLO: Hasan Karakaya, Tel: 05317232997
- CLO: Hülya Siner, Tel: 05317232951

- **AYGM Complaints Email Address:** muratygc@uab.gov.tr, acelya.yenilmez@uab.gov.tr, karakaya.hasan@outlook.com, hulyasiner@outlook.com

■ **Face to Face:**

- Stakeholders, including the public, can discuss their grievance with assigned personnel of AYGM at local offices.

■ **Public Grievance Mechanism Paper Form (Appendix B):**

- Stakeholders including the public, can fill in the paper grievance form in Appendix B and either send it to AYGM's offices, or email it to muratygc@gmail.com or acelya.yenilmez@uab.gov.tr.

■ **Online application:**

- Stakeholders can fill out the grievance form forms online at: <https://aygm.uab.gov.tr/ispartakule-cerkezko-y-demiryolu-hatti-projesi>

6.3.11. The above contact details will be updated by TCDD& TCDD Transport prior to operation and publicly disclosed on TCDD & TCDD Transport's website.

6.4 CONTRACTOR'S ROLE IN IMPLEMENTING THE PROJECT GRIEVANCE MECHANISM

6.4.1. The Contractor and their sub-contractors will have roles and responsibilities in the relation to implementation of the project-level grievance mechanism, as required in the **CMP**. AYGM and the Supervision Consultant will supervise the Contractors and their sub-contractors to ensure that they input to the project-level grievance mechanism. The Contractor's Social Lead will be responsible for implementing the Contractor's input to the grievance mechanism, with support for the Contractor's CLOs. All public complaints that arise will be logged within AYGM's database by the Contractor's Social Lead. The Contractor CLOs will be responsible for responding to grievances received by the contractor and updating the database accordingly. The Supervision Consultant's CLOs will conduct regular inspections of the Contractor's records relating to grievances received and their resolution and will inform PIU regarding the unsolved grievances.

7 MONITORING, REPORTING AND RESPONSIBILITIES

- 7.1.1. Successful stakeholder engagement depends on performance monitoring, analysis and adapting to changed circumstances and stakeholder information needs. AYGM will implement the SEP and **RAP** and will update both plans regularly during the different stages of the Project.
- 7.1.2. The PIU Social and Resettlement Specialist during construction and the TCDD Transport Environmental and Social Manager² during operation are ultimately responsible for the management and monitoring of the SEP. The PIU Social and Resettlement Specialist will be responsible for the implementation of the **RAP**.
- 7.1.3. The PIU Social and Resettlement Specialist and CLOs will also review this SEP regularly to ensure that all the consultation activities are implemented and are in accordance with the planned schedule.

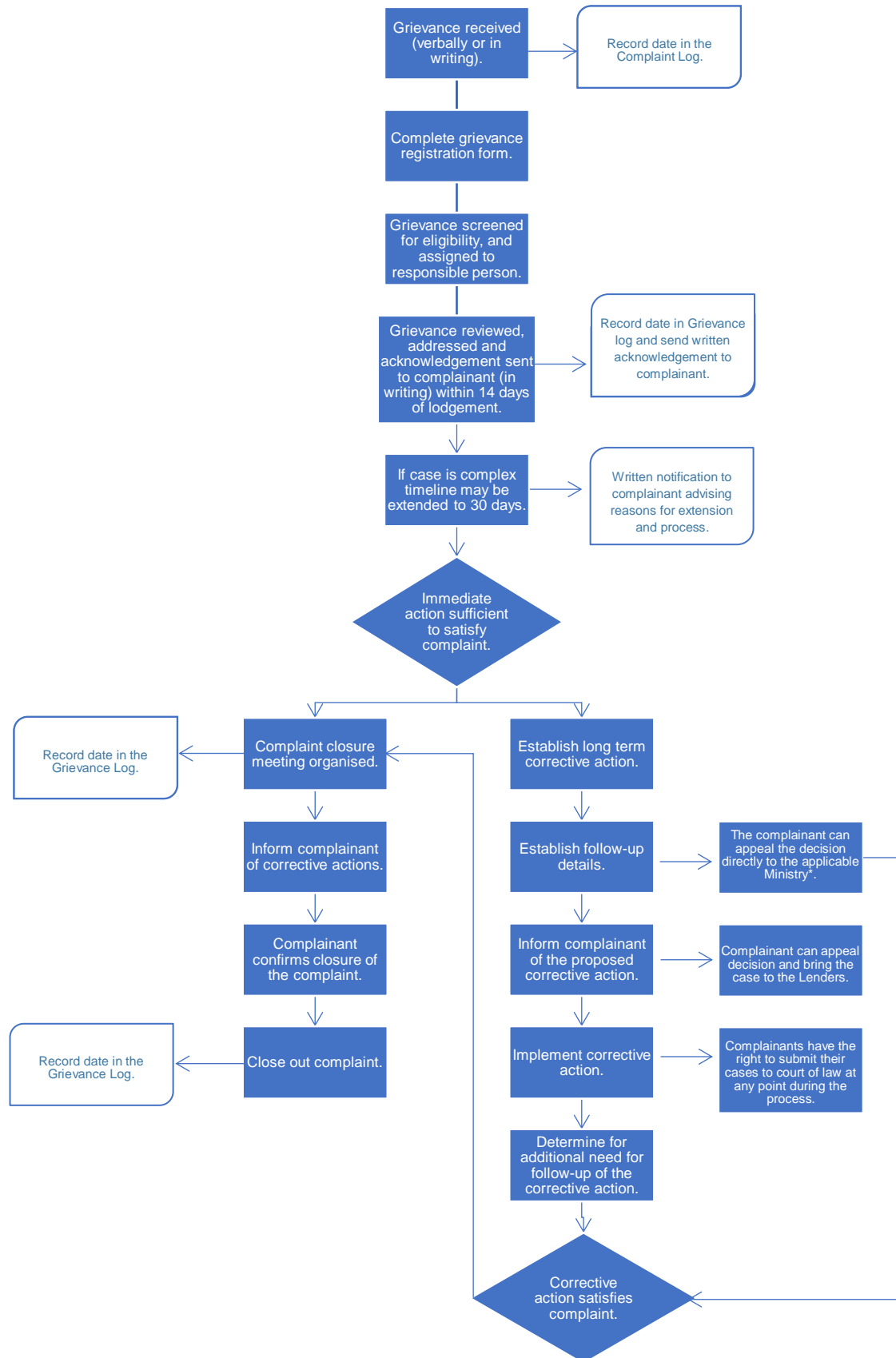
Table 7-1 - Monitoring and Review

Aspect	Key Performance Indicator (KPI)	Responsible Party
Grievance Mechanism	<ul style="list-style-type: none"> ▪ Ensure implementation of the Project Grievance Mechanism; ▪ Ensure the Contractors implements a Grievance Mechanism that is fully aligned with the Project Grievance Mechanism; ▪ Number of Grievances received and immediately stored in the central database; ▪ Number of Grievances received and resolved (monthly and quarterly); ▪ Resolution of concerns and grievances within the time period defined on the AYGM website; and ▪ Reduced number of complaints throughout the Project implementation. 	CLOs (PIU, Supervision Consultant and Contractor)
Contractors Workers Grievance Mechanism	<ul style="list-style-type: none"> ▪ Ensure the Contractors implements a Worker Grievance Mechanism; ▪ Number of Grievances received and resolved (monthly and quarterly); ▪ Resolution of concerns and grievances within the time period defined in the CMP; and ▪ Reduced number of complaints throughout construction. 	Contractors Human Resources Lead
Stakeholder Consultation	<ul style="list-style-type: none"> ▪ Increased awareness of local communities about the Project timeline, impacts and benefits; ▪ Successful completion of disclosure stakeholder engagement activities; ▪ Community concerns are addressed in the final version of the ESIA; and ▪ Ensure inclusive and meaningful consultation throughout construction and operation. 	PIU, Supervision Consultant and Contractor CLOs (with oversight by the PIU Social and Resettlement Specialist, Supervisor Consultant's Social Supervisor and the Contractor's Social Lead TCDD Transport Social

Aspect	Key Performance Indicator (KPI)	Responsible Party
		and Environmental Specialist during operation
External Independent Monitoring	<ul style="list-style-type: none"> ▪ Ensure effective AYGM, TCDD and TCDD Transport social performance; ▪ Ensure effective addressing of the Project Grievance Mechanism; and ▪ External monthly monitoring of stakeholder engagement and RAP implementation activities as part of the wider Environmental and Social Monitoring. 	External Independent Monitoring Consultant
Supervision Consultant's Social Supervisor	<ul style="list-style-type: none"> ▪ Monitoring of the Contractor's social performance and adherence to the construction-related measures in the RAP, e.g. securing temporary land. 	Supervision Consultant's Social Supervisor

Appendix A

COMPLAINT PROCEDURE



*The Ministry of Transport and Infrastructure.

Appendix B

PUBLIC GRIEVANCE FORM

Complaint Register No:		Date:	
Location of Complaint Received:		Co-ordinates of Area subject to Complaint:	
Land Parcel No, if complaint is related to Land:			
COMPLAINANT INFORMATION			
Full Name			
Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent		
Contact Information Please mark how you wish to be contacted (mail, telephone, email).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By Email: _____		
Language Please mark your preferred language for communication	<input type="checkbox"/> Turkish <input type="checkbox"/> Other		
DESCRIPTION OF CONCERN, INCIDENT OR GRIEVANCE			
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Date of Incident/Grievance:			
	<input type="checkbox"/> One-time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)		



SOLUTION REQUESTED BY COMPLAINANT			
What would you like to see happen to resolve the problem?			
Registrar Name:		Complainant Name:	
Registrar Signature:		Complainant Signature:	
Date:		Date:	

Please return this form to: ali.ketencioglu@aub.gov.tr
or guzide.sayin@uab.gov.tr

Appendix C

GRIEVANCE RESOLUTION FORM



How was the grievance received?	<input type="checkbox"/> Grievance Box (specify which box/location) <input type="checkbox"/> Direct contact with CLOs <input type="checkbox"/> Other
Reference No:	
Description of Concern, Incident or Grievance: <i>What is the grievance/ What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>	
Date of Grievance	
Has the Grievance been Resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No; <i><u>If not provide a justification below</u></i>
<u>Fill Out Either Section 1 OR Section 2 below</u>	
Section 1	
Summary of Actions Undertaken to Resolve Grievance	
Date of Implementation	
Responsible Party	
Section 2	
Summary of Proposed Actions to be Implemented to Resolve Grievance	
Timeline for Implementation	



Registrar Name:		Complainant Name:	
Registrar Signature:		Complainant Signature:	
Date:		Date:	

Appendix D

GRIEVANCE LOG SHEET

Ref No.	How Was Grievance Submitted?	Date of Submission of Grievance	Name / Contact Information	Description of Grievance	Category of Grievance	Actions Taken to Resolve the Grievance	Date of Resolution	Date of Communication of Solution	Has Grievance Been Resolved (Y/N)? <i>(if not explain why)</i>	Days to Resolve Grievance

