

Ankara-Nigde Motorway Project

Stakeholder Engagement Plan (SEP)

ERG Otoyol Yatırım ve İşletme A.S.

April 2018

Quality information

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Abbreviations

ANM	Ankara - Nigde Motorway
BOT	Build-Operate-Transfer
BP	Business Policy
CLO	Community Liaison Officer
CSO	Civil Society Organisations
EIA	Environmental Impact Assessment
EP	Equator Principles
EPFIs	Equator Principles Financial Institutions
ERG	ERG Otoyol Yatirim ve Isletme A.S.
ESIA	Environmental and Social Impact Assessment
IFC	International Finance Corporation
KGM	General Directorate of Highways
LRP	Livelihood Restoration plan
MoTMAC	Turkish Ministry of Transport, Maritime Affairs and Communications
PR	Performance Requirement
PS	Performance Standards
QHSEM	Quality, Health, Safety and Environment Manager
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SME	Small and Medium-sized Enterprises
TEM	Trans-European Motorway
TEMA	Turkish Foundation for Combating Soil Erosion for Reforestation and the Protection of Natural Habitats
TMMOB	The Union Chambers of Turkish Engineers and Architects
TOBB	The Union of Chambers and Commodity Exchanges of Turkey
ToR	Terms of Reference
UN	United Nations
UNECE	United Nations Economic Commission for Europe
WWF	World Wide Fund for Nature
YOL-IS	Union of Turkish Roads, Buildings and Construction Workers

1. INTRODUCTION

The Stakeholder Engagement Plan (SEP) is an action plan prepared for the Ankara-Nigde Motorway Project (hereafter referred to as the ANM or ANM Project) that sets out methods for effective communication and interaction with stakeholders. Stakeholders are individuals or groups that are/can be directly or indirectly affected by a project.

The objectives of the SEP of the ANM Project are as follows:

- to help ensure that the Project is designed and implemented in a participatory and community-friendly manner, taking account of the views of stakeholders,
- to determine the stakeholders that have a role in ANM Project, and to define their roles and requirements for engagement,
- to guide the relationships of the ANM Project team with the stakeholders throughout the construction and operation phases,

ANM Project SEP identifies the stakeholders, defines their roles and engagement capacities and determines the ways the Project interacts with stakeholders. SEP draws a communication and engagement roadmap to ensure the achievement of the Project objectives and operation of the Project in a transparent, inclusive, responsive and cooperative manner. SEP also sets out grievance mechanism for stakeholders, ensuring that the Project has a functioning grievance procedure in place. SEP also identifies the content of monitoring and evaluation activities to be carried out along with monitoring indicators. SEP is a living document. It will be updated in line with the requirements of the project and the indicators of monitoring and evaluation.

2. PROJECT OVERVIEW

The ANM is a key national transportation project planned and developed by the General Directorate of Highways (KGM) of Turkey, a governmental organization operating under the body of the Turkish Ministry of Transport, Maritime Affairs and Communications (MoTMAC). The ANM is one of the complementary sections of the United Nations Economic Commission for Europe (UNECE) Trans-European Motorway (TEM) Project, which is a regional transportation infrastructure project. The ANM, being one of the core sections of the TEM, constitutes the missing section of the TEM network in southern Turkey. Due to financial difficulties, the Project could not be put out to tender and was put on hold during that period. In 2015, the KGM decided to implement the ANM Project through a build-operate-transfer (BOT) model.

A full Environmental Impact Assessment (EIA) process in line with the Turkish EIA Regulation, covering both the motorway and the quarries and borrow sites planned to be used for the construction activities, was initiated by the KGM as the developer of the ANM Project in May 2015. Based on the EIA Report prepared in this scope, the Ministry of Environment and Urbanization issued an EIA Positive Decision for the Project in September 2016 (Decision Date: September 5, 2016; Decision No: 4280) in accordance with the Turkish EIA Regulation.

As part of the BOT tender process conducted by the KGM in accordance with the provisions of the Law on Implementation of Some of the Investments and Services in the Framework of Build, Operate and Transfer Model (Law No: 3996) and its implementation regulation, the authority declared ERG Otoyol Yatirim ve Isletme A.S. ("ERG" or the "Project Company") as the Appointed Company in April 2017. ERG is constituted by the joint venture of two companies, namely ERG Construction Trade and Industry Co. Inc. (ERG Construction) and Seza Construction. The BOT Contract for the implementation of the ANM Project was signed between the KGM and ERG in August 18, 2017. The concession period in the scope of the BOT Contract covers 11 years 10 months 17 days, including the 3 year-construction phase, which starts with the financial close in the scope of the international financing process.

The Turkish government issued a Prime Ministry Circular specifically for the ANM Project to emphasize and legalize Project's priority on all consents and all bureaucratic procedures as the Project is part of Turkey's Vision 2023 and listed as an important global project by the KGM.

The Motorway will cross the provinces of Ankara, Aksaray, Konya, Kirsehir, Nevsehir and Nigde, which are located in Central Anatolia. The Project will consist of the following three sections:

- i) Section 1: Ankara Golbasi-Acikuyu Intersection,
- ii) Section 2: Acikuyu-Alayhan Intersection, and
- iii) Section 3: Alayhan-Golcuk Intersection.

According to the current design (as of January 2017), ANM will be a dual carriage way (2 x 4 lanes in the first 30 km part of the main route; 2 x 3 lanes for the remaining part) with a total length of approximately 330 km including the main route and connection roads. The Project will be designed, constructed and operated in accordance with the terms of the BOT Contract and the technical specifications of the KGM. The main components of the Motorway will consist of the engineering structures including the intersections, viaducts, underpasses, overpasses, bridges and culverts, as well as the operational facilities including the services areas, park areas and maintenance centers. The districts that will be crossed by the Motorway route in each province and the corresponding road lengths are listed in Table 2-1. General layout of the ANM is presented in Figure 2-1.

Table 2-1. Provinces and Districts Located Along the Motorway Route (as of March 2018)

Provinces Crossed by the Motorway	Districts Corresponding to the Motorway Route	Length (km)	
		Main Route	Connection Roads
Ankara	Golbasi, Bala, Sereflikochisar, Evren	143.9	18.8
Aksaray	Ortakoy, Sariyahsi, Gulagac, Agacoren, Merkez	76.2	10.3
Konya	Kulu	3.1	2.7
Kirsehir	Merkez	0.0	17.0
Nevsehir	Acigol, Derinkuyu	26.4	2.3
Nigde	Merkez	27.4	1.8
Total		277.1	53.0

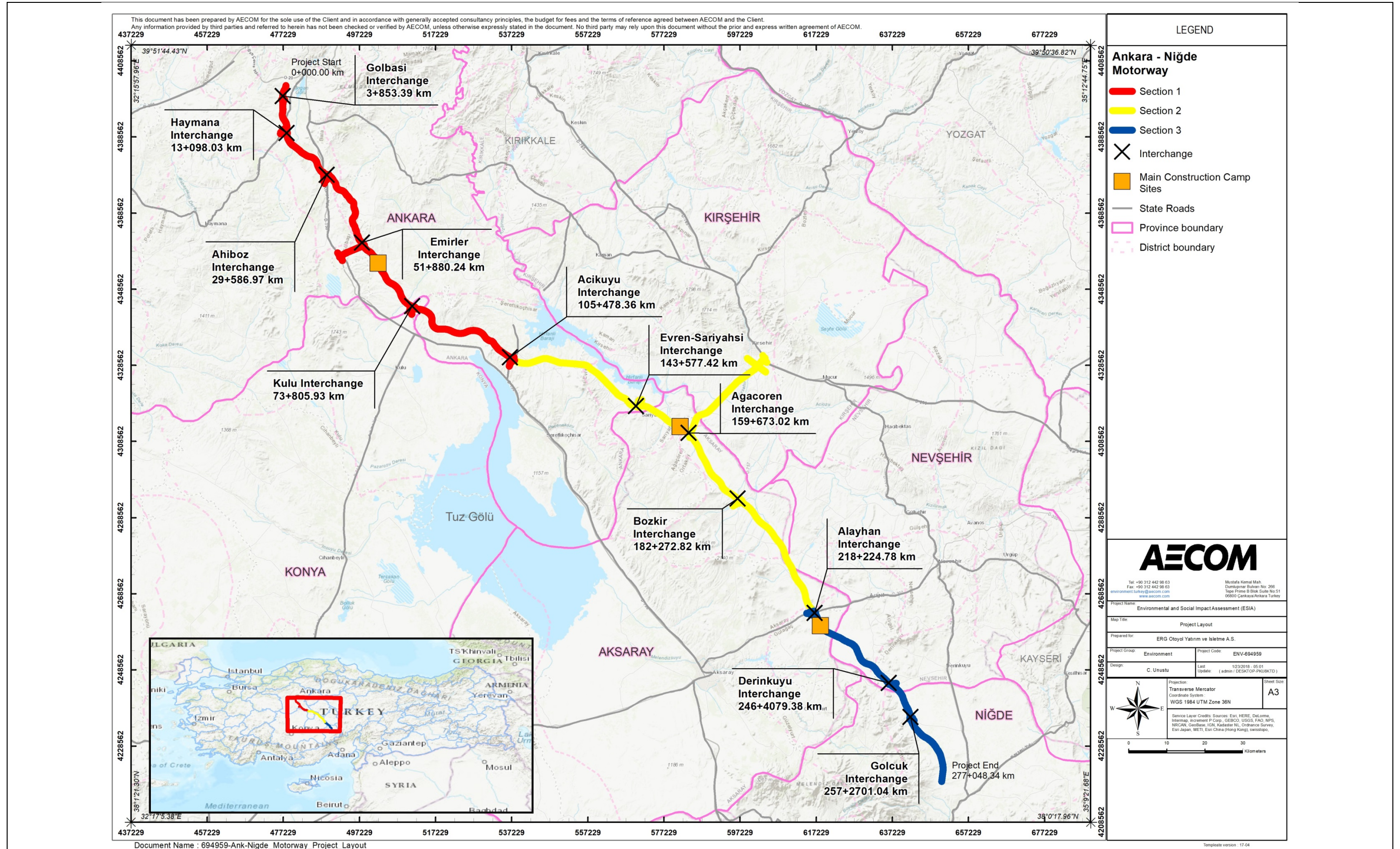


Figure 2-1. General Layout of the Ankara-Nigde Motorway

The route of the Motorway and its connection roads crosses mainly the agricultural lands located on the Anatolian Plateau. The settlements that are located along the Motorway route and whose lands are crossed by the Project are listed below in Table 2.2 While the Project will pass within the boundaries of these settlements, it is not typically within the residential part of the settlement, with impacts in each settlement generally being limited to agricultural land rather than any built structures.

Table 2.2. Project Affected Settlements

No	Province	District	Settlement	Population (TurkStat, 2017)
1	Ankara	Gölbaşı	Hacilar	1,951
2	Ankara	Gölbaşı	Ballikpınar	899
3	Ankara	Gölbaşı	Yavrucuk	338
4	Ankara	Gölbaşı	Gokcehuyuk	986
5	Ankara	Gölbaşı	Karagedik ercan	1,149
6	Ankara	Gölbaşı	Karagedik aydin	1,311
7	Ankara	Gölbaşı	Mahmatli	271
8	Ankara	Gölbaşı	Mahmatlibahçe	97
9	Ankara	Gölbaşı	Bağiči	292
10	Ankara	Bala	Yoreli	394
11	Ankara	Bala	Ahmetçayiri	127
12	Ankara	Gölbaşı	Emirler	559
13	Ankara	Bala	Yeniyapancarsak	261
14	Ankara	Bala	Hanburun	78
15	Ankara	Bala	Derekişla	214
16	Ankara	Bala	Belçarşak	403
17	Ankara	Bala	Sofular	510
18	Ankara	Gölbaşı	Ahiboz	253
19	Ankara	Gölbaşı	Soğulcak	153
20	Ankara	Bala	Koçyayla	121
21	Ankara	Sereflikochisar	Aktaş	36
22	Ankara	Sereflikochisar	Doğankaya	87
23	Ankara	Sereflikochisar	Akarca	144
24	Ankara	Sereflikochisar	Büyükkışla	326
25	Ankara	Sereflikochisar	Yusufkuyusu	41
26	Ankara	Sereflikochisar	Acıöz	33
27	Ankara	Sereflikochisar	Acıkuyu	89
28	Ankara	Sereflikochisar	Kaçarli	278
29	Ankara	Sereflikochisar	Gülhüyük	359
30	Ankara	Sereflikochisar	Şerefli davutlu (kiyevi)	108
31	Ankara	Evren	Cebirli	173
32	Ankara	Evren	İnebeyli	74
33	Ankara	Evren	Yusufluşağı	122
34	Ankara	Evren	Altınbaşak (Kürtü)	184
35	Ankara	Evren	Solakuşağı	103
36	Ankara	Evren	Çatalpınar (Çerkezuşağı)	185
37	Ankara	Evren	(Merkez)	2,573
38	Konya	Kulu	Köşker	83
39	Konya	Kulu	Yaziçayir	968

No	Province	District	Settlement	Population (TurkStat, 2017)
40	Aksaray	Sariyahsi	Sariyahsi	3,342
41	Aksaray	Sariyahsi	Bekdik	326
42	Aksaray	Sariyahsi	Bogazkoy	539
43	Aksaray	Ağaçören	Kütüklü	185
44	Aksaray	Ortaköy	Harmandali	1,209
45	Aksaray	Ortaköy	Çiftevi	483
46	Aksaray	Ortaköy	Salari Alaca	536
47	Aksaray	Ortaköy	Gökler	471
48	Aksaray	Ortaköy	Bozkir	774
49	Aksaray	Ortaköy	Sarikaman	1,110
50	Aksaray	Ortaköy	Pirli	71
51	Aksaray	Ortaköy	Durhasanlı	225
52	Aksaray	Ortaköy	Kumbet	848
53	Aksaray	Ortaköy	Çatin	516
54	Aksaray	Ortaköy	Ozancik	846
55	Aksaray	Merkez	Babakonağı	276
56	Aksaray	Merkez	Karakova	47
57	Aksaray	Merkez	Alayhani	565
58	Aksaray	Gülağaç	Süleymanhüyükü	263
59	Aksaray	Gülağaç	Osmanli (Düğüz)	166
60	Aksaray	Gülağaç	gülpinar Kasabasi	2,768
61	Aksaray	Gülağaç	Bekarlar	1,132
62	Nevşehir	Derinkuyu	Kuyulutatlar	1,141
63	Nevşehir	Derinkuyu	Yazihüyük (Bozkir)	1,981
64	Nevşehir	Gülşehir	Ovaören	645
65	Nevşehir	Acigol	Kurugöl	952
66	Nigde	Merkez	Gösterli	1,147
67	Nigde	Merkez	Hasakoy	975
68	Nigde	Merkez	Yildiztepe	2,177
69	Nigde	Merkez	Pinarcik	812
70	Nigde	Merkez	Kayirli	1076
71	Nigde	Merkez	Kileredere (Hürriyet)	1,289
72	Nigde	Merkez	Baglama (Cumhuriyet) kasabasi	2,095
73	Kirşehir	Merkez	Saraycik	208
74	Kirşehir	Merkez	Kocabey	57
75	Kirşehir	Merkez	Guzler	191
76	Kirşehir	Merkez	Kusdilli	3,438
77	Kirşehir	Merkez	Yenice	490
Total				51,705

Source: Turkstat, 2018.

The land acquisition (land consolidation/expropriation) corridor for the Motorway will be minimum 100 m extending up to 500 m at the locations of embankment areas, interchange, service areas, etc. Land acquisition for the Project is being performed by using two separate methods: land consolidation and expropriation. Land consolidation (LC) is being implemented by the Ministry of Food, Agriculture and Livestock, General Directorate of Agricultural Reform (GDAR). Execution of expropriation works in line with the Expropriation Law (Law No: 2942) is under the responsibility of the KGM in accordance with the BOT Contract. The liability of the Project Company regarding the expropriation is limited to the payment of up to 50 million TL of the expropriation cost. The KGM will be liable to pay the expropriation costs exceeding this limit. The Project Company does not have the right to intervene on the expropriation process; its only role is for asset inventory submission to KGM. Once, the inventory is submitted, the decisions on expropriation and execution of the expropriation process lies with KGM.

The Project Company is considering international and national finance for the implementation of the Project. To meet the environmental and social requirements of the potential Lenders, AECOM Turkey Consultancy and Engineering Limited Company ("AECOM" or the "ESIA Consultant") has been retained in November 2017 to carry out an Environmental and Social Impact Assessment (ESIA) study in line with Equator Principles III (June 2013) and IFC's Sustainability Policies, Performance Standards (January 2012) and relevant Environmental, Health and Safety Guidelines. As per the environmental and social categorization approaches of the Equator Principles Financial Institutions (EPFI) and the Export Credit Agencies (ECAs), the ANM Project has been assessed as a "Category A" Project and an ESIA process has been conducted accordingly. As part of the ESIA studies, AECOM has prepared an ESIA Disclosure Package that included an ESIA Report, a Non-technical Summary (NTS), and Environmental and Social Monitoring and Management Framework Plan (ESMMFP) in addition to this SEP. An Environmental and Social Action Plan (ESAP), Livelihood Restoration Plan Framework (LRPF) and Resettlement Action Plan Framework (RAPF) have also been prepared for the Project.

3. STAKEHOLDER FEEDBACK TO DATE

Stakeholder feedback collected as part of the national EIA and the subsequent ESIA processes is described in the following sections. After the completion of the ESIA process, the Project will start the ESIA disclosure process as identified in Chapter 6 and Chapter 7 of this SEP.

3.1 National EIA Process

The national EIA process starts with the submittal of an EIA Application File, summarizing the characteristics of the project and the impact area, and the potential environmental impacts and mitigation measures, through the online EIA system of the Ministry of Environment and Urbanization (“Ministry”). At the beginning of the scoping phase of the process, the General Directorate of Environmental Impact Assessment, Permitting and Auditing of the Ministry establishes a Scoping and Review and Evaluation Committee (“Committee”) including the representatives from related governmental agencies and institutes (if deemed necessary, related universities, representatives of the relevant research organizations, experts, professional chambers, unions, associations and non-governmental organizations may be asked to participate in the Committee depending on the scope and type of the project). Project owner and the local EIA Consultant are also included in this Committee that would prepare the EIA report. The Commission, which has been established by the Ministry for the ANM Project included the a large number of governmental institutions and companies (more than 30) as listed in Table 3-1.

Table 3-1. EIA Review and Evaluation Commission

Organization	Directorate/Administration
Ministry of Culture and Tourism	General Directorate of Cultural Assets and Museums
	Konya Regional Directorate of Cultural Assets Preservation Board
	Nigde Regional Directorate of Cultural Assets Preservation Board
Ministry of Energy and Natural Resources	General Directorate of Mining
Ministry of Environment and Urbanization	Aksaray Provincial Directorate for Protection of Natural Assets
	Konya Provincial Directorate for Protection of Natural Assets
	Nevsehir Provincial Directorate for Protection of Natural Assets
	Nigde Provincial Directorate for Protection of Natural Assets
Ministry of Food, Agriculture and Livestock	Ankara Provincial Directorate of Food Agriculture and Livestock
	Nevsehir Provincial Directorate of Food Agriculture and Livestock
	Nigde Provincial Directorate of Food Agriculture and Livestock
	Aksaray Provincial Directorate of Food Agriculture and Livestock
	Konya Provincial Directorate of Food Agriculture and Livestock
	Kirsehir Provincial Directorate of Food Agriculture and Livestock
Ministry of Forestry and Water Affairs	General Directorate of State Hydraulic Works
	General Directorate of Forestry
	State Hydraulic Works 4 th Regional Directorate
	State Hydraulic Works 5 th Regional Directorate
	Ministry of Forestry and Water Affairs 7 th Regional Directorate
	Ministry of Forestry and Water Affairs 8 th Regional Directorate
	Ministry of Forestry and Water Affairs 9 th Regional Directorate
	Ministry of Forestry and Water Affairs Kayseri Regional Directorate
Ministry of Interior	Aksaray Provincial Special Administration
Ministry of National Defense	Department of Construction Real Estate and NATO Security Investments
Ministry of Transport, Maritime Affairs and Communications	General Directorate of Highways
Prime Ministry, Disaster and Emergency Management Presidency	Ankara Governorate Provincial Directorate of Disaster and Emergency
Turkish Armed Forces	General Staff

Organization	Directorate/Administration
Affiliated Governmental Organizations and Companies/Public Economic Enterprises	Turkish State Railways
	Turkish Petroleum Corporation
	Petroleum Pipeline Company (BOTAS)
	Turkish Electricity Transmission Company
	Baskent Natural Gas Investment Co.

Source: (DOKAY, 2016)

The national EIA Regulation requires that once the Project application is made, the Ministry and the related Governorate(s) announces to the public by using appropriate communication tools (e.g. announcements, notice boards, internet, etc.) that the Project application has been made, EIA process has been initiated, and the views and proposals about the Project may be submitted to the Governorate or the Ministry until the completion of EIA process. Afterwards, the date(s) for the public participation meeting(s) are determined by the Ministry and the scoping views of the Committee members are collected through Ministry's online EIA system. Once these dates are set, the Ministry sends a copy of the EIA Application File to the Committee members and informs them about the dates set for the Public Participation Meeting and the submittal of scoping views.

According to the national EIA legislation, public participation meeting is held in a central place that would be easily accessed by the people mostly affected by the Project. Time and location of the meeting is determined by the relevant Provincial Directorate of the Ministry of Environment and Urbanization ("Ministry"). The date, time, place and scope of the meeting is announced on the web page of the Ministry, on the announcement boards of the relevant governorates and municipalities, and in one national and one local newspaper (at least ten calendar days before the date of the meeting).

For the ANM Project public participation meetings were conducted in July 2015 in six provinces located along the Motorway route, namely Ankara, Konya, Aksaray, Kirsehir, Nevsehir and Nigde. The program of the Public Participation Meetings conducted as part of national EIA process is provided in the Table 3.2.

Table 3.2. Public Participation Meetings under National EIA Process

Public Participation Meeting Locations	Date	Number of Participants
Nevsehir	July 21, 2015	12
Kirsehir	July 21, 2015	22
Nigde	July 22, 2015	37
Aksaray	July 22, 2015	14
Konya	July 23, 2015	11
Ankara	July 23, 2015	67

Source: (DOKAY, 2016)

In accordance with the national EIA Regulation, the announcements for the ANM Project's public participation meetings were made in national and local newspapers¹ two weeks prior to the public participation meetings date. The meetings were chaired by the related Provincial Directorates of the Environment and Urbanization. During the meetings, the Project's environmental impacts and proposed mitigation measures were presented and participants concerns and questions regarding the Project were collected. Representatives of KGM, as the owner of the Project, attended the meetings and responded the questions and concerns raised by the participants. All collected questions and concerns are reflected under the participation meeting minutes, which was then summarized as a separate annex to the EIA Report.

¹Nevsehir Kent Haber Newspaper published locally in Nevsehir, Kirsehir Cigdem Newspaper that published locally in Kirsehir, Nigde News Newspaper published locally in Nigde, Aksaray Rota Newspaper published locally in Aksaray, Hakimiyet Newspaper published locally in Konya province and Anayurt Newspaper, which broadcasts in the city of Ankara on July 3, 2015

Following the Public Participation Meeting, the Special EIA Report Format for the ANM Project was drawn up by the Ministry taking into consideration the views and proposals of the Committee and the public. The EIA Report was prepared by the local EIA Consultant in line with the Special Format and submitted to the Ministry for review and evaluation by the Review and Evaluation Committee members. In accordance with the national EIA Regulation, the start of the review process and that the Draft EIA Report is disclosed to public view was announced by the Ministry and its relevant Provincial Directorate(s) using appropriate communication tools (e.g. announcements, notice boards, internet, etc.). Public could review the Draft EIA Report and submit their views and comments to the Ministry or its Provincial Directorate from the announcement date to the report finalization through the Review and Evaluation Meeting(s).

During the Review and Evaluation Meeting(s), questions or comments of the committee members were answered and/or discussed. The Report was finalized based on the comments of the committee members and the Final Draft EIA report was submitted to the Ministry for the final public disclosure. Accordingly, the Final Draft EIA Report was disclosed by the Ministry and its related Provincial Directorates for 10 calendar days through announcement boards and internet. At the end of the disclosure process, the Ministry issued an EIA Positive Decision for the ANM and Access Roads and Borrow Pits Project on September 5, 2016 (Decision No: 4280). The decision of the Ministry was communicated to public using appropriate means in line with the national EIA Regulation.

3.2 ESIA Process

The ESIA studies for the ANM Project started in December 2017. As part of the scoping stage of the ESIA process, a social field study comprising interviews with project affected communities, households and local institutional stakeholders was conducted by the expert team of SRM Consultancy between February 12 to 18, 2018. During this study, a total of 6 district governors and provincial governors, 7 provincial and district directorates of Food, Agriculture and Livestock, 8 municipalities and 24 mukhtars/vice mukhtar (institutional stakeholders) representatives were interviewed in 19 settlements included in the field sample for the field study methodology and sampling strategy). 375 socio-economic (household) surveys and 4 focus groups were conducted with the Project affected communities. In total, 446 stakeholders and 45 institutional stakeholders engaged in the social field study.

A detailed list of consulted institutional stakeholders is provided in Table 3.3. The results of the field study consultations are presented in Appendix A which includes comments, further information requests and questions on the Project that are collected from Project Affected Persons (PAPs), key informants and public stakeholders.

Table 3.3. Stakeholders Engaged During the Social Field Study

Institution	Position
Governorships	
Aksaray Gülağaç District Governorships	Governor
Aksaray Ortaköy District Governorships	Chief Clerk
Aksaray Provincial Governorships	Deputy Governor
Ankara Gölbaşı District Governorships	Governor
Ankara Şereflikoçhisar District Governorships	Governor
Nevşehir Derinkuyu District Governorships	Chief Clerk
Provincial and District Directorate of Agricultures	
Aksaray Gülağaç District Directorate of Agriculture	District Director
Aksaray Ortaköy District Directorate of Agriculture	District Director
Aksaray Provincial Directorate of Agriculture	Assistant Director
Ankara Bala District Directorate of Agriculture	District Director
Ankara Evren District Directorate of Agriculture	District Director
Ankara Gölbaşı District Directorate of Agriculture	District Director
Ankara Şereflikoçhisar District Directorate of Agriculture	District Director

Institution	Position
Mayors	
Aksaray Ortaköy Municipality	Private secretary
Aksaray Sarıyahşi Municipality	Deputy Mayor
Ankara Bala Municipality	Mayor
Ankara Evren Municipality	Director of Technical Works
Ankara Gölbaşı Municipality	Deputy Mayor
Ankara Şereflikoçhisar Municipality	Deputy Mayor
Konya Kulu Municipality	Deputy Mayor
Nevşehir Derinkuyu Municipality	Mayor
Mukhtars/Headmen	
Ankara Gölbaşı Hacılar Mukhtar	Mukhtar
Ankara Gölbaşı Gökçeşüyük Mukhtar	Mukhtar
Ankara Gölbaşı Karagedik Ercan Mukhtar	Mukhtar
Ankara Bala Yörelî Mukhtar	Mukhtar
Ankara Bala Yeniapançarşak Mukhtar	Mukhtar
Konya Kulu Yazıçayır Mukhtar	Mukhtar
Ankara Şereflikoçhisar Akarca Mukhtar	Mukhtar
Ankara Evren Cebirli Mukhtar	Mukhtar
Ankara Evren İnebeyli Mukhtar	Mukhtar
Aksaray Sarıyahşi Boğazköy Mukhtar	Mukhtar
Aksaray Ortaköy Harmandalı Mukhtar	Mukhtar
Aksaray Ortaköy Bozkır Mukhtar	Mukhtar
Aksaray Ortaköy Kümbet Mukhtar	Mukhtar
Aksaray Ortaköy Ozancık Mukhtar	Mukhtar
Aksaray Gülağaç Osmanlı Mukhtar	Vice Mukhtar
Niğde Merkez Hasaköy Mukhtar	Mukhtar
Nevşehir Derinkuyu Kuyulutatlar Mukhtar	Vice Mukhtar
Ankara Evren Esentepe Mukhtar	Mukhtar
Ankara Evren Yenimahalle Mukhtar	Mukhtar
Aksaray Sarıyahşi Fatih Mukhtar	Mukhtar
Aksaray Sarıyahşi Yenidoğan Mukhtar	Mukhtar
Niğde Merkez Yıldıztepe Yenimahalle Mukhtar	Mukhtar
Niğde Merkez Yıldıztepe Bahçelievler Mukhtar	Mukhtar
Niğde Merkez Bağlama Cumhuriyet Mukhtar	Muhtar

In parallel to the engagement conducted as part of the ESIA, the Governor of Ortakoy district of Aksaray invited the mukhtars of the affected settlements and organized an information meeting about the land consolidation and other works on February 15, 2018.

4. LEGISLATION AND INTERNATIONAL STANDARDS/ REQUIREMENTS RELATING TO STAKEHOLDER ENGAGEMENT

4.1 National Legislation

The Constitution of the Republic of Turkey is the basic document relating to stakeholder engagement in the Project. Articles of the Constitution on engagement are as follows:

- Freedom of thought and opinion (Turkish Constitution, Article 25):

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 thought and opinions.

- Freedom of expression and dissemination of thought (Turkish Constitution, Article 26)

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.

- Right of Petition (Turkish Constitution, Article 74)

Citizens and foreigners residing in Turkey, provided that reciprocity is respected, have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to requests and complaints concerning themselves or the public.

Other laws and regulations that includes provisions on stakeholder engagement are summarized below:

Civil Law

The rights and restrictions on real estate are defined in the relevant section of the Civil Code No. 4721 (Official Gazette dated December 08, 2001 and numbered 24607). Provisions of the Turkish Civil Code shall be accepted at all stages of the Project.

Right to Information Act

Right to Information Act (Law No. 4982; Official Gazette dated October 24, 2003 and numbered 25269) defines the process for the right to information. It regulates this right in line with the principles of equality, impartiality and openness that are required by a democratic and transparent administration.

Law on the Use of the Right to Petition

According to Article 3 of the Law on the Use of the Right to Petition (Law No. 4982; Official Gazette dated November 01, 1984 and numbered 3071), citizens of the Turkish Republic have the right to apply in writing to the Turkish Grand National Assembly and to the competent authorities relating to their wishes and complaints about themselves or the public. Foreigners who reside in Turkey can benefit from this right, provided that principle of reciprocity is observed and that their petition is written in Turkish.

Land Consolidation

Formal definition of Land Consolidation (LC) by the General Directorate of Agricultural Reform (GDAR) is the process where fragmented, scattered and unfavorably shaped land parcels under private ownership are optimally rearranged and recombined in suitable geometrical shapes to facilitate modern agricultural practices and irrigation². On-farm investments complement land consolidation in order to provide farmers access roads, on farm irrigation and drainage system, land leveling and soil reclamation services.

² Ceylan Ali Riza, Satana Suha, Sert Atakan "The Turkish Experience in Consolidation of Irrigated Land: Productivity and Efficiency Implications" Responsible Land Governance: Towards an Evidence Based Approach, World Bank Conference on Land and Poverty, Washington DC. March 20-24, 2017 <https://www.conftool.com/landandpoverty2017/index.php/07-11->

In Turkey, land consolidation is carried out according to the provisions of two different laws, and the procedural steps of implementation are generally similar. These laws are the Law No 3083 "Agricultural Reform Law on Land Rearrangement in Irrigated Areas" and Law No. 5403 "Law on Soil Conservation and Land Use". The Ministry of Food, Agriculture and Livestock (MoFAL) is the responsible institution for all implementations (or projects) related to land consolidation under the provisions of both of these laws referenced above.

In addition to MoFAL, State Hydraulic Works (DSI) can also undertake land consolidation. The criteria of DSI for selection and prioritizing of the proposed irrigation schemes include completion of land consolidation works. Work done by DSI, however, is subject to GDAR oversight.

LC can be implemented by GDAR (or authorized sub-agencies or entities to meet their land acquisition need in order to provide public services) on rainfed (dry agriculture) and irrigated land (irrigated agriculture). In rainfed land, the sole lead organization is the GDAR, while on irrigated land; DSI is authorized to undertake LC in conjunction with irrigation development.

Land fragmentation is regarded as one of the key obstacles for agricultural development in Turkey. Land fragmentation is primarily caused by inheritance (civil code), infrastructural investments (roads, highways, railways, HEPPs etc.), irrigation and drainage infrastructure, expropriations, and/or voluntary property subdivisions.

In order to avoid further land fragmentation, laws on Land Protection and Land Use introduced indivisible parcel size, sale prohibition in 2014. LC is prioritized by the government for agricultural development and protection of agricultural land.

LC projects in Turkey are carried out via two principal methods: compulsory and demand-driven. Council of Minister's decision is required for both types of consolidation. Yet, when voluntary land consolidation is implemented, more than half of the land owners (in number and land size) demand land consolidation and sign deed of consent to land consolidation. Involuntary land consolidation is implemented upon the request of Ministry (MoFAL) or boards (soil protection) after the Council of Minister's decision.

Information meeting is conducted with local public stakeholders and land owners in order to understand their demands/requests pertaining to land consolidation. Information on Project area, pertaining to land resources, irrigation, on-farm services are collected to develop Project related task list. The minutes of the meeting is disclosed through using local public information channels.

In land consolidation process, firstly the General Directorate of Agricultural Reform announces in written form the first notice of land consolidation plan where the newly planned parcels are shown. Then the written objections of the landowners are received by GDAR and new plans are developed considering the objections. The new land consolidation plans are announced in the second notice and objections are received. The notice-objection process continues on until an agreement is reached, usually it takes three notices to reach an agreement but there are cases in which fourth and fifth notices are announced. The notice-objection process is a critical part of stakeholder engagement for land consolidation.

Expropriation Law

The Expropriation Law (Law No. 2942; Official Gazette dated November 08, 1983 and numbered 18215) ensures that the process is carried out in accordance with the objective, authority, procedure, justification and the subject of the action in cases where expropriation is compulsory. Land acquisition through expropriation in the Project will be done by KGM. As the Project Owner under the BOT Contract, KGM is one of the most important public stakeholders of the Project. The expropriation process, the objections made by the affected stakeholders and how the objections are concluded by KGM will be monitored by the Project Company.

Expropriation will be conducted according to Expropriation Law No. 2942. Article 8 of expropriation law states that after the expropriation decision is taken, the administration will appoint one or more valuation commissions (consisting of at least 3 people) to identify the value of immovables. Additionally, one or more negotiation commissions (again consisting of at least 3 people) will be assigned for negotiations.

After the administration has notified the owner of its intent to take over the immovable, shall the owner or its representative apply to the administration (within 15 days after notification) with the intent of selling the

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immovable, negotiation meetings are held on the date identified by the commission. If an agreement is reached, an official report is signed.

The administration prepares the amount stated in the report within forty days and asks the owner to transfer the ownership rights in the name of the administration on the date specified in the title deed. The expropriate fee is paid as soon as the transfer of rights is realized.

The owner and occupant of the immovable property subject to expropriation and other concerned parties may file actions against the expropriation procedure or appraised values and errors of fact before judicial courts.

In case of failure in agreement according to Article 8, appraisal of the Expropriation Price by the Court and registration of the immovable property in the name of the administration according to Article 10 of the Law:

- If expropriation cannot be performed through purchase, the Authority will refer to the civil court of the district where the immovable property is located, by submitting a petition including the related appraisal document as well as other information and documents.
- The Court will ascertain the date of trial for thirty days after the date of application by the Authority at the latest, and summon the owner of the immovable property to the case through official notice. The Administration will be notified of the date of trial.
- During the trial, the judge will invite the parties to come to mutual agreement on the price of the immovable property. If the parties come to mutual agreement on the price, the judge will ascertain the agreed price as the expropriation price.
- In case the parties fail to come to mutual agreement on the price during the trial, the judge will establish the date of **survey within ten days at the latest** and **the date of trial on a date thirty days later**, and carry out an **on-site survey** to assess the value of the immovable property **by means of experts** and before all the concerned parties. During the survey, the headman of the village or quarter in which the immovable property is located will be invited to be present at the survey, and his statement will also be heard.
- Experts will submit to the court their reports indicating the value of the immovable property within fifteen days by having regard to statements of the parties and other concerned parties. The Court will notify the parties of such report without the requirement to wait for the date of trial. The judge, the parties or their counsel and the experts will be summoned to the trial. During the trial, the parties' statements of objection, if any, against the expert's report are heard and then statement of experts against such objections are heard.
- If the parties cannot agree upon the price, a new committee of experts will be appointed, where required, for conclusion within fifteen days by the judge, and the judge will ascertain a fair and equitable expropriation price on basis of report(s) issued and statements given by the parties and experts. This price, ascertained by the Court, is the expropriation price of the immovable property, source or the right of way.
- The Authority will be granted a period of fifteen days for the amount ascertained by the judge as the expropriation price to be deposited into the designated bank and the related receipt to be submitted. In cases where such amount has been deposited or the right owner cannot be identified, the court may rule upon registration of the immovable property in the name of the authority and payment of the expropriation price to the right owner provided that a receipt evidencing that the amount has been blocked for any future payment to the right owner.

Right of Action, according to Article 14 of the Law:

- An action for annulment may be filed by the owner of the immovable property subject to expropriation, before administrative jurisdiction, against the expropriation procedure, or a correction action may be filed by such owners before civil and criminal jurisdiction against errors of fact **within thirty days** from the **date of service** by the court, or in cases where the parties have not received any notice, **from the date when an announcement was made by the court via newspaper**.

- The Authority may file correction actions before the civil and criminal jurisdiction within thirty days from the date when the expropriation documents are submitted to the court.

Registration of the immovable property which is not entered in land registry, and rights of the occupant, according to Article 19 of the Law:

- The Court shall carry out an inquiry on the site by means of the experts mentioned in the Law, collect evidence and draw up a report to explain the situation. Such reports will include details about the surface area of the immovable property, identity of the occupant, its tax registry, starting date and duration of occupancy and whether the conditions for entitlement with the ownership have been fulfilled.
- All the documents issued by the Authority and collected as per the Article 10 will be submitted to the civil court of the area where the immovable property is located, and it will be claimed that the expropriation price of the immovable property be ascertained and the immovable property be registered in the name of the Authority in consideration for payment of the price.

Environmental Impact Assessment (EIA) Regulation

The EIA Regulation (Official Gazette dated November 25, 2014 and numbered 29186) is regulated under Article 10 of the Environmental Law. It aims to prevent or mitigate existing and potential impacts of projects that can create destructive environmental impacts. Relevant provisions of the EIA Regulation including the public participation meeting and disclosure of documents and decisions issued throughout the process have been described in Section 3.2 of this SEP.

4.2 International Standards/Requirements

International finance institutions have adopted policies and procedures regarding the assessment and management of environmental and social impacts of the projects concerned to be financed. These environmental and social policies and requirements are mainly based on the World Bank Group (WBG) Safeguard Policies. In this regard, the Environmental Health and Safety Guidelines and Performance Standards on Environmental and Social Sustainability of the International Finance Corporation (IFC) (under the WBG) have become one of the most important international requirements. Thus, major international private banks have also adopted these standards through the Equator Principles (EPs) which aim to ensure that the projects considered to be financed are developed environmentally and socially sound way. Export credit agencies (ECAs) of the Organisation for Economic Co-operation and Development (OECD) countries also benchmark private sector projects against IFC Performance Standards.

The scope of the ESIA Report prepared for the ANM Project will be in accordance with the following standards:

- Equator Principles III (June 2013)
- IFC's Sustainability Policies and Standards (January 2012)
- Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence ("OECD Common Approaches") (2016)

Key points of the abovementioned international environmental and social standards relating to the stakeholder engagement are presented below. It is important to note that, in some cases, the national (Turkish) regulations differ from the levels and measures set out in the above standards. ANM Project will aim to achieve the most stringent standards in such cases.

The Equator Principles³

The Equator Principles Financial Institutions (EPFIs) have adopted a number of improved policies to determine, evaluate and manage the social and environmental risks in project financing in order to ensure that the projects issued in 2006, renewed in June 2013 and financed by EPFIs are socially and environmentally responsible. Accordingly, these policies and principles define the conditions that must be observed by the institutions that use credit as the persons responsible for the planning and implementation of project activities. These principles

³ The Equator Principles (EP III), June 2006

include avoiding as much as possible, or if these effects are inevitable, reducing/preventing to some extent and/or compensating appropriately⁴ the negative impacts on the ecosystems and communities affected by the project.

With regard to stakeholder engagement, the Equator Principles emphasize the following:

Environmental and Social Management System and Equator Principles Action Plan (Principle No. 4), Stakeholder Engagement (Principle No. 5) and Grievance Mechanism (Principle No. 6) are the Equator Principles relating to the Project.

Specifically, Principle 5 requires consultation with the local community and other stakeholders on an ongoing basis, compliant with the population affected by the project activities, taking into account cultural sensitivities and in a structured way. This principle also requires that the consultation be independent, optional and informative, and that the needs of the groups affected by this project be determined. The consultation should be "free" (free of external manipulation, interference or enforcement), "pre-planned" (timely disclosure of information) and "relevant" (understandable and accessible information) and should be applied to the entire project process, not just the first stage of the project.

A grievance mechanism should also be in place. Principle 6 requires the establishment of a mechanism that regularly and systematically receives and registers the grievances of the population affected by the project activities and that at the same time mandates action be taken within a certain time period. Social and Environmental Impact Assessment (Principle No. 2)

International Finance Corporation (IFC) Sustainability Policies and Standards⁵

For the social aspects of the Project, ANM Project takes into account the IFC Sustainability Framework, Performance Standards (2012). IFC's Sustainability Framework includes IFC's policies and eight performance standards related to sustainability.

Purpose of Performance Standard 1 is to identify and evaluate the environmental and social risks and impacts of the project; anticipate and prevent, and where prevention is not possible, minimize risks and impacts on the employees/workers, affected Communities and the environment⁶, and where there are residual impacts, implement a mitigating hierarchy for risks and effects in order to compensate/balance the risks and effects; encourage customers to increase their environmental and social performances through effective use of management systems; ensure that grievances from Affected Communities and requests from other stakeholders are properly responded and managed; extend close cooperation on issues that may influence the Affected Communities, provide appropriate tools and ensure that relevant environmental and social information is disclosed and shared during the project. One of the key elements of PS 1 is stakeholder engagement. Stakeholder engagement is regarded as a "ground for building strong, constructive, sensitive relationships that are necessary for the successful management of the environmental and social impacts of the project"⁷. PS1 confirms that the relationship is dependent on the risks and effects of the Project and generally includes "stakeholder analysis and planning, disclosure and dissemination of information, consultation and engagement, grievance mechanism and ongoing reporting to affected communities.

Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence ("OECD Common Approaches") (2016)

The OECD Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence, which was adopted on 28 June 2012 and revised by the OECD Council on 6 April 2016, sets common approaches for undertaking environmental and social due diligence to identify, consider and address the potential environmental and social impacts and risks relating to applications for officially supported export credits as an integral part of Members' decision-making and risk management systems (www.oecd.org).

⁴ The Equator Principles (EP III), June 2013.

⁵ IFC Performance Standards on Environmental and Social Sustainability, 2012.

⁶ The options that are adopted to minimize the risks and effects vary. Accordingly, risks and effects can be reduced, corrected, repaired and/or reverted. Risk and effect mitigation hierarchy is explained in more detail in the relevant sections of Performance 2-8.

⁷ IFC Sustainability Framework, 2012.

Exchange and disclosure of information is one of the main components of the due diligence process. Under this component, adherents should publish national ECA environmental and other related policy statements or principles and procedural guidance relevant to the implementation of the Recommendation. Also taking into account the competitive context in which they operate and constraints of business confidentiality, for Category A projects, Adherents should disclose publicly project information, including project name, location, description of project and details of where additional information (e.g. ESIA report, summary thereof) may be obtained, such as a buyer and/or project sponsor contact point and/or website link, as early as possible in the review process and at least 30 calendar days before a final commitment to grant official support; and require that environmental and social impact information (e.g. ESIA report, summary thereof) be made publicly available as early as possible in the review process and at least 30 calendar days before a final commitment to grant official support.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder identification and analysis is the first step of SEP. The aim of this section is to determine each stakeholder group, define its specific level of interest and influence in the Project. At an early stage of the Project, it is important to perform a thorough stakeholder analysis. The stakeholder database will be updated as needed during the Project lifecycle.

Stakeholder interest is defined as the extent to which the interests of a stakeholder are affected by the Project either due to the Project's direct impact on them or because of a political, financial, social, cultural, scientific or technical interest in the Project. These interests can be either positive or negative and can lead to either an improvement or deterioration in a stakeholder's baseline conditions. Stakeholder interest is assessed using the criteria defined in Table 5.1.

Table 5.1. Stakeholder Interest Level Definitions

Interest Level	Definition
High	The Project potentially has a significant positive or negative impact on the interests of the stakeholder. The impact is considered to be significant and the stakeholders are highly sensitive to the impact.
Medium	The Project potentially has a moderate positive or negative impact on the interests of the stakeholder. The impact is considered to be medium and stakeholders are moderately sensitive to the impact.
Low	The Project potentially has a minor positive or negative impact on the interests of the stakeholder. The impact is considered to be minor and stakeholders are not considered sensitive to the impact.

Stakeholder influence refers to the power that a stakeholder has over the Project's outcomes. Influence can be direct or indirect. Indirect influence derives, for example, from a stakeholder's ability to influence others or their access to important information. Formal influence may derive from their ability to directly affect decision making through, for example, the issue of government approval and permitting decisions. Stakeholder influence level is qualitative based on the criteria presented in Table 5.2.

Table 5.2. Stakeholder Influence Level Definitions

Influence Level	Definition
High	The stakeholder or stakeholder group is considered highly influential and has the capacity to stop the Project or significantly impact the developers' reputation. For example, powerful civil society organisations (CSOs) and individuals who can affect the Project's 'social license' to operate.
Medium	The stakeholder or stakeholder group is considered to have moderate influence and moderate capacity to influence the Project or impact the developers' reputation. For example, lobby groups, NGOs and small associations.
Low	The stakeholder or stakeholder group is isolated and has limited capacity to exert influence over the Project or the developers' reputation. For example, stakeholders who lack institutional and social legitimacy, lack awareness on the Project or have weak capacity. Isolated communities that are geographically distant are considered to have low influence; however, a group of these communities connected through associations and social media can be considered to have medium influence.

5.1 Stakeholder Analysis Matrix

Using the categorization of impact and influence, stakeholder analysis matrix (see Figure 5-1) facilitates the development of an appropriate stakeholder disclosure and consultation strategy.

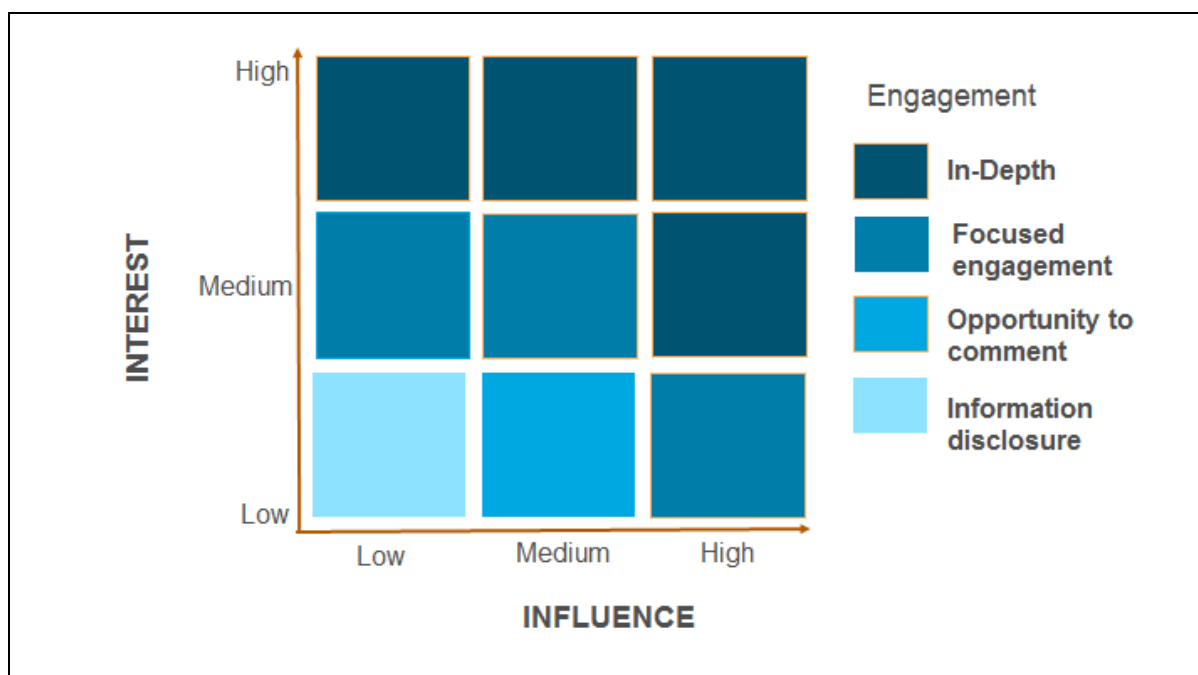


Figure 5-1. Stakeholder Analysis Matrix

Table 5.3 provides a summary of the key stakeholder groups identified for ANM Project. The interest and influence levels as well as engagement levels of each stakeholder group is listed within the table.

Table 5.3. Stakeholder Groups and Interest/Influence in the Project

Stakeholder Group	Stakeholder Entity	Interest/Influence in the Project
National authorities	<ul style="list-style-type: none"> Ministry of Transport, Maritime Affairs and Communications <ul style="list-style-type: none"> General Directorate of Highways Ministry of Environment and Urbanization Ministry of Culture and Tourism Ministry of Food, Agriculture and Livestock <ul style="list-style-type: none"> General Directorate of Agriculture Reform 	Interest level: High Influence level: High Engagement level: In-Depth These are the key stakeholders who manage the decision-making, control, and audit processes throughout the construction and operation phases of the Project. As part of Project's land acquisition, the expropriation activities are carried out by KGM, the land consolidation works are carried out by the General Directorate of Agricultural Reform.
Local authorities	- District Governorships, Municipalities and District Directorate of Food, Agriculture and Livestock of the districts listed below: <ul style="list-style-type: none"> Golbasi Bala Kulu Sereflikochisar Evren Sariyahsi Agacoren Ortakoy Gulsehir Gulagac Acigol 	Interest level: High Influence level: Low Engagement level: In-Depth These authorities represent the key stakeholders in the region. Since the Project has a national importance, the level of influence of these stakeholders is low, while their level of interest is high. Therefore, a strong engagement with these stakeholders is important for the Project.

Stakeholder Group	Stakeholder Entity	Interest/Influence in the Project
	<ul style="list-style-type: none"> Derinkuyu <p>-Provincial Governorships, Provincial Directorate of Culture and Tourism, Provincial Directorate of Food, Agriculture and Livestock of the Provinces listed below:</p> <ul style="list-style-type: none"> Ankara Aksaray Niğde Konya Nevşehir Kırşehir <p>-Mukhtars of the directly affected communities and settlements</p>	
Directly affected communities and settlements	<ul style="list-style-type: none"> Communities and settlements located in the immediate vicinity of the Project Area (A detailed list is provided in Table 2-2) Local communities using the Project Area for agricultural and livestock purposes 	<p>Interest level: High Influence level: Low Engagement level: In-Depth</p> <p>These communities and settlements are affected by the land acquisition (including those who lose other assets), transportation (to land or other settlements) and local employment impacts of the Project. However, since the Project is determined at national level, the influence level of these stakeholders is low. The interest level of these stakeholders is high since they are directly affected by the Project. In-depth engagement with these stakeholders has critical importance for the Project.</p>
Communities that will be affected from the resettlement	<ul style="list-style-type: none"> Kümbet settlement (13 households) Potentially other settlements 	<p>Interest level: High Influence level: Low Engagement level: In-Depth</p> <p>These communities are the stakeholders that will lose their permanent residences (houses) and will therefore be subject to resettlement.</p>
Local businesses located in the vicinity of the Project Area and those directly affected by the Project	<ul style="list-style-type: none"> Local Enterprises Small Medium Enterprises (SMEs) 	<p>Interest level: Medium Influence level: Low Engagement level: Focused engagement</p> <p>The businesses that are located on the ANM Project's new route will be affected positively from the Project. The business on the old route will be potentially negatively impacted. However since the old route will continue to be used, the negative impact levels might not be high. These stakeholders' representatives such as chambers and organizations should be informed on route development and investments of the project.</p>
Social service providers located in the vicinity of the Project Area and those directly affected by the Project	Social service providers located or operating close to the construction camps will likely to have an interest, particularly for any medical services that may need to provide service for diseases or injuries for workers at the camp.	<p>Interest level: Low Influence level: Low Engagement level: Information disclosure</p>

Stakeholder Group	Stakeholder Entity	Interest/Influence in the Project
Non-governmental Organization (NGOs) and Civil Society Organizations (CSOs)	<ul style="list-style-type: none"> Environment Foundation of Turkey WWF Turkey TEMA The Union of Chambers and Commodity Exchanges of Turkey (TOBB) Union of Turkish Roads, Buildings and Construction Workers (YOL-IS) Chambers of Commerce and Industry The Union Chambers of Turkish Engineers and Architects (TMMOB) Union of Chambers of Merchants and Artisans 	<p>Interest level: Medium (Especially local and regional NGOs and CSOs expects positive economic impacts from the Project)</p> <p>Influence level: Low</p> <p>Engagement level: Focused engagement</p> <p>These are key NGO stakeholders operating at national and local levels. In particular, it is important that local Chambers of Commerce and Industry and Chambers of Merchants and Artisans should be informed about the Project, because these local organizations are representatives of businesses that may be affected by the Project.</p>
Media	<ul style="list-style-type: none"> National news agencies National media Regional and local media 	<p>Interest level: Low</p> <p>Influence level: Low</p> <p>Engagement level: Information disclosure</p> <p>National, regional and local media organizations will be informed about the project details.</p>
ANM Project	<ul style="list-style-type: none"> Employees Contractors Sub-contractors 	<p>Interest level: Low</p> <p>Influence level: Medium</p> <p>Engagement level: Opportunity to comment</p> <p>These stakeholders are contractors and sub-contractors and employees who will engage in the local employment, construction and maintenance activities of the project.</p>

A detailed stakeholder list is provided in Appendix B. This list will be periodically updated by the Project Company following the monitoring activities.

5.2 Vulnerable Stakeholders

Vulnerable groups among the Project affected population were identified through the socio-economic study conducted as part of the ESIA. Field study revealed that vulnerable groups are prone to impacts on their livelihoods due to land acquisition, economic displacement, reduced life quality due to construction, community health and safety issues and physical resettlement. Vulnerable groups include poor, women headed households, women, children, elderly whose livelihood sources and assets are impacted by the Project. The specific vulnerable households/individuals affected by the Project will be identified during the detailed studies to be conducted within the scope of Livelihood Restoration Plan (LRP) and Resettlement Action Plan (RAP), which will be prepared based on the frameworks developed as part of the ESIA. The vulnerable groups are important stakeholders and one of the primary aims of the SEP is to give them an equal opportunity for engagement in the Project so that the Project can take account of their views and be responsive to their needs. Also special measures will be taken for engagement with vulnerable groups such as separate meetings for local women, visiting elderly in their homes to ensure that they have meaningful information about the Project and they know how to convey their grievances.

6. STAKEHOLDER ENGAGEMENT METHODS

This section of SEP defines the methods of engagement that will be carried out by the ANM Project. It is vital for the Project to utilize different methods of engagement with all of the stakeholders throughout Project's construction and operation phases. Table 6.1 describes in detail the engagement methods.

Among the methods described in this table, the Project Company has already activated Project's web site (<http://www.ergotoyol.com.tr/>) in January 2018 and uploaded a grievance and comment form on this site. In addition, a Community Liaison Officer (CLO) has been appointed under SPV's organization structure (reporting to the Quality, Health, Safety and Environment (QHSE) Manager of the Project Company) as of April 2018.

Table 6.1. Informed Consultation and Participation Methods

Method	Description	Targeted Stakeholder	Phase
Public meetings	<ul style="list-style-type: none"> Meetings providing Project information and hosting question and answer session with a large audience. They will be held at local venues which can be easily accessed by the Project's stakeholders and at convenient times. Printed materials (information brochures etc.) made available to support presentations and discussion. Attendance taken at all meetings. 	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected from the resettlement Local Authorities Local Businesses General Public 	<ul style="list-style-type: none"> ESIA Disclosure Project Construction Phase
One-to-one and small group meetings	<ul style="list-style-type: none"> Meetings with key stakeholders and those with access to important baseline information. Meetings are generally more in-detail and can be used for joint planning. 	<ul style="list-style-type: none"> National Authorities Local Authorities Mukhtars Local Business Representatives 	<ul style="list-style-type: none"> ESIA Consultation ESIA Disclosure Project Construction Phase Project Operation Phase
Period of comment	<ul style="list-style-type: none"> Gives local communities the opportunity to provide feedback on the draft ESIA and proposed project activities. Copies of the ESIA and non-technical summary are distributed to key stakeholders and Directly Affected Communities and Settlements Contact number of Community Liaison Officer (CLO) responsible is provided and communities can request support or guidance on how to provide comments. 	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected from the resettlement National Authorities Local Authorities Local Businesses Mukhtars 	<ul style="list-style-type: none"> ESIA Disclosure
Post/phone/email	<ul style="list-style-type: none"> Opportunity to ask questions or raise concerns about the Project and ESIA process in a timely manner through the CLO responsible. Reporting grievances to the Project 	<ul style="list-style-type: none"> All stakeholders 	<ul style="list-style-type: none"> Project Construction Phase Project Operation Phase
Project website	<ul style="list-style-type: none"> Making the Project's website run, publishing ESIA Non-technical Summary (NTS) and the relevant plans on the website. At the same time, publishing all the information brochures and other visual materials on the website Grievance mechanism communication tools should be presented on the website Reporting grievances to the Project 	<ul style="list-style-type: none"> All stakeholders 	<ul style="list-style-type: none"> ESIA Disclosure Project Construction Phase Project Operation Phase

7. STAKEHOLDER ENGAGEMENT PROGRAM

This section provides a summary planned stakeholder engagement program. Stakeholder consultations in the scope of the ANM Project is planned to be conducted in accordance with Table 7.1.

Table 7.1. Conducted and Planned Stakeholder Consultations

Consultation Phase	Activity	Stakeholders	Date/Expected Date	Objective of Consultation
Scoping Phase Consultations	Scoping Field Study (Conducted site reconnaissance along the entire Motorway route and visited locations of the key project components and selected settlements located within the Motorway's land acquisition)	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form resettlement Mukhtars 	January 2018	<ul style="list-style-type: none"> Preparation of scoping report and planning of the social field surveys in the scope of the ESIA
	Social Field Study as part of ESIA (a total of 6 district governors and provincial governors, 7 provincial and district directorates, 8 municipalities and 24 mukhtars/mukhtar representatives were interviewed in 19 settlements. Also, 375 socio-economic surveys and 4 focus groups were conducted. In total, 446 stakeholders and 45 institutional stakeholders were consulted.	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form the resettlement Mukhtars Local Authorities 	February-March 2018	<ul style="list-style-type: none"> Household surveys, mukhtar surveys and local authority consultations in selected settlements. Establishment of socio-economic baseline and preparation of the social impact assessment as part of the ESIA (see Chapter 15)
ESIA disclosure	Public disclosure meetings (In the 6 affected provinces, meetings are planned in 15 districts. Additional meetings would be conducted in settlements that will be affected by physical displacement (e.g. Kumbet). In these meetings, presentation will be done to summarize the key findings of the ESIA and opportunity will be given to the participants to receive answer to their questions, concerns)	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form physical displacements Local Authorities Local Businesses Representatives (Chambers etc.) General Public 	During ESIA disclosure phase (expected in 2018 Q2)	<ul style="list-style-type: none"> To allow public and other interested parties to obtain information about the Project and convey their opinions, questions, comments to responsible parties To increase information level on the grievance mechanism and methods of communication of the stakeholders
	Distribution of printed Project information materials (All materials including the brochures, key components of the ESIA Disclosure Package, etc. will be in Turkish)	<ul style="list-style-type: none"> Local Authorities Mukhtars These materials will be made available through the mukhtars, municipalities and governorships 	During ESIA disclosure phase (expected in 2018 Q2)	<ul style="list-style-type: none"> To provide transparent and accurate information about the Project and the ESIA process/findings
	Project website (http://www.ergotoyol.com.tr/ ; at least during 30 calendar days before financial close)	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form the resettlement Local Authorities Local Businesses 	During ESIA disclosure phase (expected in 2018 Q2)	<ul style="list-style-type: none"> To provide transparent and accurate information about the Project and the ESIA process/findings Publish information on the grievance mechanism and communication tools

Consultation Phase	Activity	Stakeholders	Date/Expected Date	Objective of Consultation
		<ul style="list-style-type: none"> Representatives (Chambers etc.) General Public 		
Construction Phase	One-to-one meetings (e.g. through the CLO(s), etc.) Small meetings Public meetings Distribution of printed materials Post/phone/email	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form the resettlement Local Authorities Local Businesses Representatives (Chambers etc.) Mukhtars 	Entire construction phase	<ul style="list-style-type: none"> Provision of information on Project construction activities to the relevant stakeholders Inform stakeholders about Project's local employment, local purchase/procurement opportunities Provide information on the grievance mechanism communication tools (e.g. on project website, through information brochures) Land Acquisition and Consolidation consultation with affected land owners, This will be conducted by KGM and Agricultural Reform Directorate
Early Operation Phase	One-to-one meetings Small meetings Public meetings Distribution of printed materials Post/phone/email	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form the resettlement Local Authorities Local Businesses Representatives (Chambers etc.) Mukhtars 	First year of operation (expected between 2021 Q1 and 2022 Q1)	<ul style="list-style-type: none"> Provision of information on Project's operation activities Inform stakeholders about Project's local employment, local purchase/procurement opportunities Provide information on the grievance mechanism communication tools (e.g. on project website, through information brochures) Follow-up impacts on Project affected communities
Operation Phase	One-to-one meetings Small meetings Public meetings Distribution of printed materials Post/phone/email	<ul style="list-style-type: none"> Directly affected communities and settlements Communities that will be affected form the resettlement Local Authorities Local Businesses Representatives (Chambers etc.) Mukhtars 	Throughout the rest of the operation phase under BOT Contract	<ul style="list-style-type: none"> Maintain the grievance mechanism and monitor the records

8. RESOURCES AND RESPONSIBILITIES

The roles and responsibilities for planning, delivering and monitoring stakeholder engagement are listed in detail in this section. Table 8.1 describes the tasks associated with each key position related with stakeholder engagement. The organizational chart for the Project is presented in Figure 8-1.

Table 8.1. Key Roles and Responsibilities for Stakeholder Engagement

Position	Tasks/Responsibilities
KGM (Project Owner)	<ul style="list-style-type: none"> Land acquisition by expropriation activities.
General Directorate of Agriculture Reform	<ul style="list-style-type: none"> Land consolidation in project affected settlements.
Project Company's Headquarters (QHSE Manager)	<ul style="list-style-type: none"> Coordinate all activities regarding the quality, environment and occupational health and safety. Act as the stakeholder engagement lead with overall responsibility for stakeholder engagement Coordinate Project company's and Contractors' CLOs and ensure that the engagement activities are delivered in line with SEP Collecting grievances and following-up the resolutions. Implementation of ESIA, RAFF and LRFP (to be replaced by RAP and LRP as soon as they are developed). Monitoring and following land acquisition by land consolidation and expropriation. Auditing of contractors throughout construction phase. Maintenance and repair activities during the construction phase and operation of the Motorway.
Project Company's CLO(s) (The number of CLOs will be determined based on detailed planning)	<ul style="list-style-type: none"> Ensuring that the stakeholder engagement strategy is communicated internally and that the staff, resources and systems are in place to enable the strategy and this SEP to be implemented. Ensure that the Grievance Mechanism is implemented. Ensure coordination and consistency across all stakeholder facing activities by all parties.
EPC Contractor/ Community Liaison Officer(s)	<ul style="list-style-type: none"> Ensure the grievance mechanism is implemented by contractors. Through review of grievance records, ensure the contractors are recording the grievances and responding in a timely and appropriate manner, as defined by the Project SEP. In coordination with the contractors and as required, develop and implement additional measures for resolving community related issues, including measures aimed at resolving non-closed grievances. Conduct routine stakeholder engagement. Ensure community grievances are recorded and responded to appropriately. Review and assess monthly contractor monitoring for social issues including local labor force, internal grievances and workers accommodation. Ensure community relations and related issues are included in the scope of monthly HSE review and incident reports to be prepared for the Project Company.
Internal Monitoring Experts	<ul style="list-style-type: none"> Periodically monitoring ESIA, RAFF and LRFP (to be replaced by RAP and LRP as soon as they are developed) throughout construction and operation activities of the Project by internal experts
External Monitoring and Evaluation Experts	<ul style="list-style-type: none"> Periodically monitoring and evaluating ESIA, RAFF and LRFP (to be replaced by RAP and LRP as soon as they are developed) throughout construction and operation activities of the Project by external experts

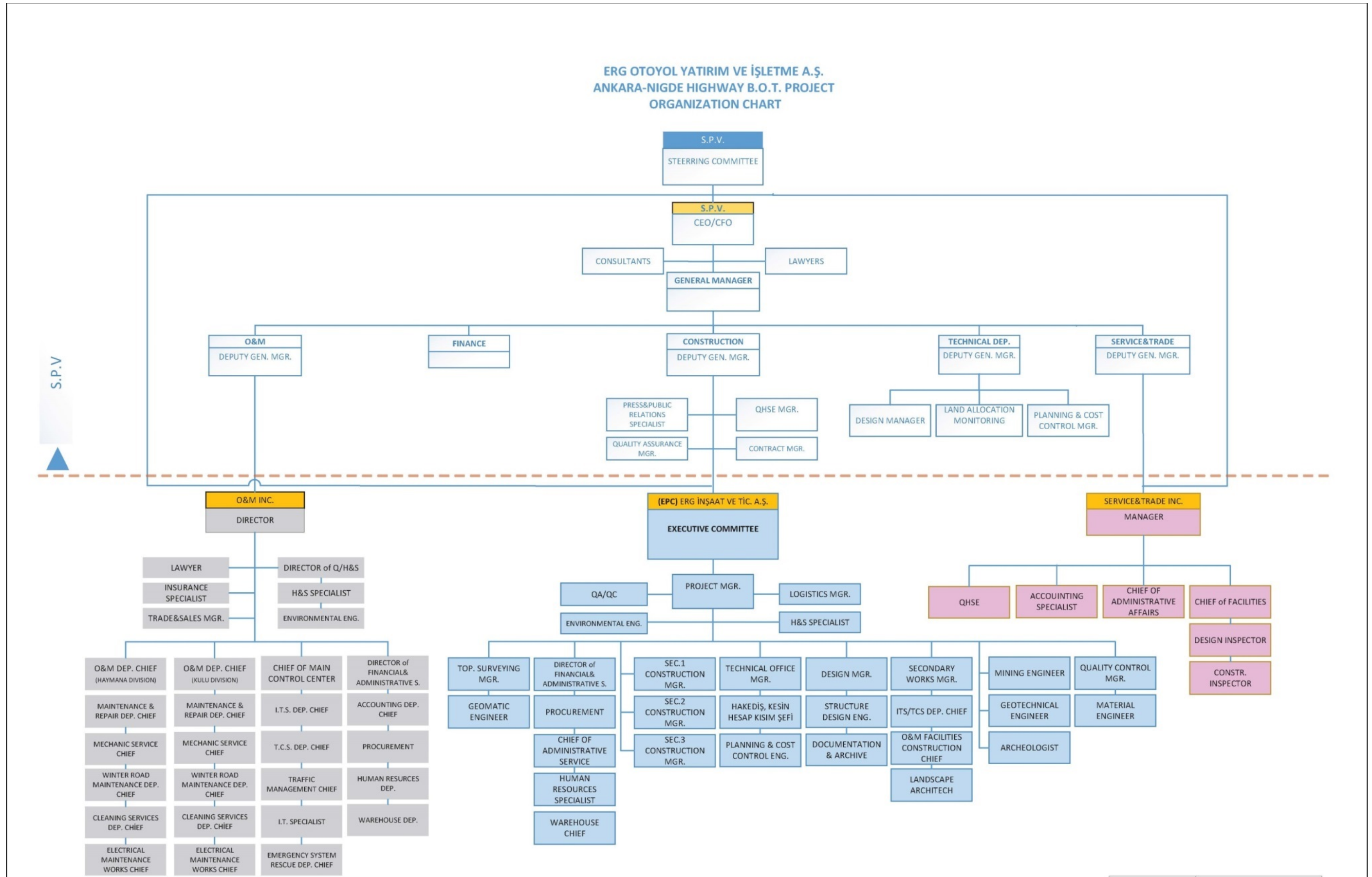


Figure 8-1. Organization Chart for the Project

9. GRIEVANCE MECHANISM

The grievance mechanism is a core element of the stakeholder engagement activities. The grievance mechanism of ANM Project is divided into three groups:

- 1) Grievances related to acquisition of land and other assets,
- 2) Grievances related to construction and operation activities of the Project Company and its contractors,
- 3) Grievances of internal stakeholders (The Project Staff, Contractor and subcontractor staff)

Grievances related to Acquisition of Land and Other Assets

While the land and other assets acquisition activities of the project are carried out by KGM, the consolidation works are carried out by the Agricultural Reform Directorate. These processes are managed by KGM and Agricultural Reform Directorate following the national legislation. Complaints and grievances about the acquisition of land and other assets are made directly to these institutions. Project Company monitors the Project related complaints and grievances and receives information from the KGM on how they are resolved.

Grievances Related Construction and Operation Activities of the Project Company and Its Contractors

The grievance mechanism of the Project aims to receive, resolve and follow the concerns and complaints of the project affected communities. In accordance with the international requirements, works on establishing a grievance mechanism for ANM Project has been initiated by the Project Company in January 2018 with the establishment of Project's web site (<http://www.ergotoyol.com.tr/>) where a grievance and comment form is uploaded. This preliminary mechanism will be improved by the Project Company so that locked grievance boxes and grievance forms will be installed at construction sites and other appropriate places (e.g. Mukhtars' offices in all Project Affected Settlements).

The Project Company's CLO will be collecting the grievances on a weekly basis throughout the construction phase (i.e. frequency for operation phase will be decided at the end of construction phase). All received grievances will be collected at Project Company's Headquarters in Ankara and management/follow-up of the grievances will be planned there.

The ANM Project will be accessible for the stakeholders and respond to all grievances (complaints, requests, opinions, suggestions) at the earliest convenience. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded and responded within a predetermined timeline and on the basis of their contents by the Project Company and that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to the grievances would be satisfactory for both parties and activities would be followed and filers of the complaints would be informed on the outcomes of the corrective activities. Project's, website will remain to be another important channel for collecting grievances and these grievances. This channel will also be managed by Project Company's Headquarters.

Experts of the Project Company and its contractors are responsible for building close relationships with the local people, other stakeholders and officials, updating them on the developments of the project, listening and recording their concerns about the project, receiving their grievances, filing them regularly and sharing them with the relevant officers of the Project Company in Ankara to ensure their speedy settlement. The CLOs responsibilities include making people aware of the grievance mechanism, receiving and transferring the grievances to the Project Company's Headquarters in Ankara. The Project Company has already appointed a Community Liaison Officer (CLO) under the SPV's organization structure (reporting to the QHSE Manager of the Project Company) as of April 2018.

The communication methods to be used by stakeholders to get their grievances filed are available in Table 9.1.

Table 9.1. Grievance Communication Methods**Method of Communication**

Web page	http://www.ergotoyol.com.tr/ http://www.ergotoyol.com.tr/sikayet-ve-oneri/
Phone	0 312 499 50 80
Address	Gaziosmanpaşa Mahallesi 79/1 Sokak No: 6 M Gölbaşı / Ankara
Email	info@ergotoyol.com.tr
Grievance Boxes	In all affected settlements
Grievance Forms	Will be filled by ERG experts

Grievances can be submitted anonymously if preferred by the grievant, though that will mean that feedback cannot be provided to the grievant. Also people submitting grievances will be free of retribution or retaliation, and the use of the Grievance Mechanism does not prevent the grievant from having access to other mechanisms (e.g. through the courts/law).

The operational flow of Grievance Mechanism for grievances related construction and operation activities of the Project Company and it's contractors is described below and illustrated in Figure 9-1:

1. Grievance communication methods are prepared for the ANM Project. Local people and stakeholders are informed. The tools are as follows:
 - Web page
 - E-mail address
 - Phone
 - Grievance Boxes (All affected settlements)
 - Grievance Forms
2. The grievances are collected through these channels:
 - Telephone
 - Personal visit to ANM Project sites or ANM Headquarters
 - Application through the grievance boxes (installed at the construction site and all affected settlements)
 - Through related public administrations (provincial and district governorships, municipalities, mukhtars)
 - E-mail
 - Meetings
 - Through staff of ANM Project
 - Written petition
 - During site visits and other.
3. All the grievances received through the channels are collected by the CLO of the Project Company.
4. The grievances received are recorded electronically on the database.

5. After the grievances are recorded, it is transmitted to Project Company's QHSE Manager and top management will be informed by the Project Company's QHSE Manager.
6. Project Company's CLO contacts the person who filed the grievance to confirm the receipt of the grievance by telephone and/or email within 7 days.
7. The related unit investigates and provides the Project Company's CLO with their opinion and suggestions for the respective grievance in writing on the grievance-complaint or grievance form, within 7 days.
8. Project Company's CLO prepares the draft response and submits it to the approval of the QHSE Manager. The content of the response is decided and approved.
9. The response is transmitted to the person who submitted the grievance by the Project Company's CLO.
10. Following the response, Grievance Form and record is updated according to the outcome of the process which may include positive acceptance of the grievance and acceptance of the resolution by the applicant.

A monitoring- evaluation system is established for the grievances. The process of grievances is recorded on the monitoring and evaluation system, by filling the numbers of days on the last section of the Grievance Form. Throughout external monitoring experts meet with the people who filed the grievances for the monitoring and evaluation process.

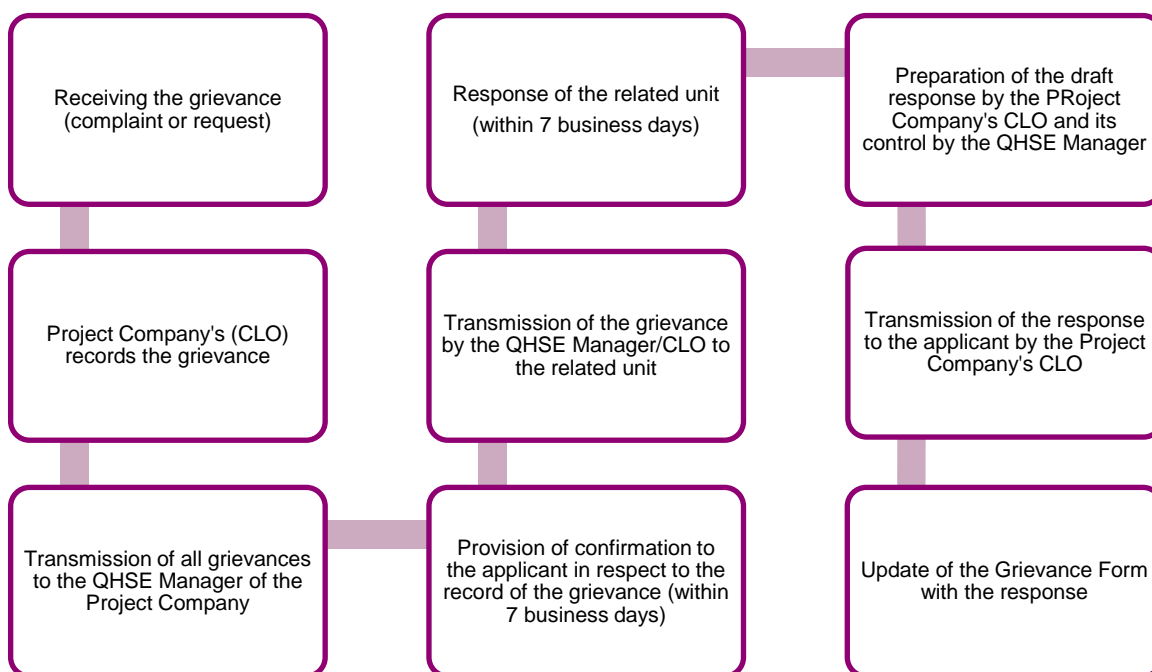


Figure 9-1. Work Flow of Grievance Mechanism

The grievance form of the Project Company is shown in Appendix C. Also the grievance link on Project Company's website is shown in Appendix D.

Grievances of Internal Stakeholders (The Project Staff, Contractor and subcontractor staff)

Internal Stakeholders are the workers, managers, representatives and suppliers who work for Project Company and its contractors. Grievances can be submitted anonymously if preferred by the grievant, though that will mean that feedback cannot be provided back to the grievant. Also people submitting grievances will be free of retribution or retaliation, and the use of the Grievance Mechanism does not prevent the grievant from having access to other mechanisms (e.g. through the courts/law).

Grievance mechanism of internal stakeholders is as follows:

- Internal stakeholders can initiate the grievance mechanism by using the following methods:
- Grievance Boxes (located at the construction areas, dining halls, social facilities, dormitories and offices)
- E-mail
- Petition
- Phone
- Through the contractor
- All of the grievances received through channels are collected in Human Resources (HR) unit.
- The grievances are recorded by HR expert. HR Unit transmits the grievance to the related unit.
- HR Expert will give the grievance holder a confirmation of receiving the grievance by telephone and/or e-mail, within 7 days, if the grievance is not anonymous.
- HR expert prepares the draft response and submits it to the approval of the Director of HR unit. Director informs the General Manager on the draft response. The content of the response is decided and approved.
- The written response is transmitted to the applicant by the HR Unit.
- Following the response, Grievance Form is updated.

10. MONITORING AND REPORTING

The main purpose of measuring the success of the SEP is to put into practice the learned, acquired knowledge and mutually agreed upon points in the engagement. Determining which items or policies cannot be changed with stakeholders from the beginning is of great importance in order to not give rise to the feeling that stakeholder views are not taken into account and to avoid the frustration that may arise. Engagement of stakeholders has an indispensable significance in obtaining focused results in advancing policies and decisions.

Since the stakeholder engagement is an integral part of the Project, the monitoring and evaluation mechanisms created for these plans will follow SEP. Below a possible SEP Monitoring Framework for the ANM Project has been identified in Table 10.1.

Also the land and other assets acquisition activities carried out by KGM, and consolidation works carried out by the Agricultural Reform Directorate will be monitored by the Project Company to the extent allowed by these agencies to identify the level of the engagement with land owners for land acquisition and compensation process with respect to the project standards.

Table 10.1.SEP Monitoring Framework

Monitoring Focus	Indication of Monitoring	Period	Frequency of Monitoring	Parties Responsible for Monitoring
Trust and Satisfaction of Society	<ul style="list-style-type: none"> - Use observations obtained from interviews and received feedback to informally track attitudes of the households affected by the project towards the restrictions imposed on the use of public land and towards the land acquisition process due to project. - Use observations obtained from interviews and received feedback. -Attitude of the stakeholders towards public consultation process. - Analyzing the community trust and satisfaction through grievance mechanism. - Projects performed by the current Project for the benefit of community as a social support. 	Construction and Operation	Weekly and Monthly	ANM Project CLO
		Construction	Once in every 6 months	Independent Community Expert /Consulting Company
		Operation (First year)	Annual	
		Operation (Second year)	TBD based on the previous results	
Public consultation process and Grievance Mechanism	<ul style="list-style-type: none"> - Defined public consultation process - activity registry, the number of meetings held, the number of participants in public meetings, visits organized to local authorities or other local stakeholders, the frequency of visits conducted to locations affected by the project. - Grievance mechanism –methods, the number of settled or closed grievances with their results. 	Construction and Operation	Weekly and Monthly	ANM Project CLO
		Construction	Once in every 6 months	Independent Community Expert /Consulting Company
		Operation (First year)	Annual	
		Operation (Second year)	TBD based on the previous results	
		Operation (rest of the BOT Concession period)		

Appendix A Results of Social Field Study Consultations

Table A.1. PAPs' Request for More Information on the Following Topics (Socio-economic Household Survey 2018)

Further information requested on:	Topic	Responses	Total Responses	Akarca	Baglama	Bogazkoy	Bozkir	Evren	Gokce huyuk	Hacilar	Harman dali	Hasakoy	Karagedik Ercan	Kuyulu tatlar	Kumbet	Osmanli	Ozancik	Sariyahsi	Yazicayir	Yeniyapanca arsak	Yildiztepe	Yoreli	
Will there air pollution? Will there mitigation measures for air population?	Air	8	8						X					X	X				X	X	X		
When will the project start constructions?	Construction	157	127	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
When will the motorway construction completed?	Construction		30				X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Will there dust? Will there mitigation measures for dust?	Dust	3	3							X				X		X							
Where should we apply for recruitment?	Employment	40	23		X	X	X	X	X			X	X	X	X	X			X			X	
How many people will be employed in the Project?	Employment		17			X	X						X	X	X	X	X	X	X		X	X	
What will be its impact on the environment?	Environment	44	44	X	X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	
To whom can we report our grievances?	Grievance	12	12					X	X	X	X		X	X					X	X	X	X	
Will lands be acquired through willing buyer willing seller negotiations or compulsory expropriation?	Land Acquisition	128	68		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	
When will I know about how much of my land has been affected?	Land Acquisition		59			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X
Will there be land consolidation?	Land Acquisition		1					X															
Will our private parcels be affected? How?	Livelihood Sources	183	58		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
How will we access the land we use (for agriculture and pasture)?	Livelihood Sources		53			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Will our Treasury, pasture and other common lands be affected?	Livelihood Sources		38			X			X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
I am cultivating on Treasury land. Will I be able to receive a compensation if it is within the motorway site?	Livelihood Sources		26			X	X	X	X	X	X			X		X	X		X		X	X	X
What will happen to the shops and businesses that is next to the old motorway?	Livelihood Sources		8				X		X							X	X			X		X	
Will there disruptive noise? Will there mitigation measures for noise?	Noise	3	3													X			X			X	
Will our houses be affected?	Resettlement	28	28		X		X	X	X	X			X		X				X		X	X	
Will the motorway pass through the village/neighbourhood?	Traffic	37	21	X	X		X	X	X	X	X		X		X				X	X	X	X	
Will the traffic density increase?	Traffic		16		X	X		X	X	X	X			X	X	X				X		X	X
Will the old motorway still be used?	Transportation	10	10	X	X			X	X		X		X	X		X				X			
Will there be a reduction in water resources? Will they be polluted?	Water Resources	15	15		X	X			X		X		X	X	X	X			X	X			

Table A.2. Mukhtar's Request for More Detailed Project Information on the Following Subjects (Mukhtar's Interview 2018)

Questions	Subject	Responses Total	Total Responses	Akarca	Baglama	Bogazkoy	Bozkir	Evren	Gokce huyuk	Hacilar	Harman dali	Hasakoy	Karagedik Ercan	Kuyulu tatlar	Kumbet	Osmanli	Ozancik	Sariyahsi	Yazicayir	Yeniyapan çarsak	Yildiztepe	Yoreli	
When will the project start constructions?	Construction	8	8			X	X	X				X		X		X					X	X	
Will there dust? Will there mitigation measures for dust?	Dust	1	1																			X	
How many people will be employed in the Project?	Employment	7	5					X			X		X				X		X				
Where should we apply for recruitment?	Employment		2								X											X	
To whom can we report our grievances?	Grievance	3	3								X			X	X								
Can they connect our pumped water supply with electricity supply?	Infrastructure	2	1																				X
Will there be any storm water infrastructures?	Infrastructure		1																				X
Will lands be acquired through willing buyer willing seller negotiations or compulsory expropriation?	Land Acquisition	3	2								X				X								
Will there be land consolidation? If yes, how will it be done?	Land Acquisition		1										X										
How will we access the land we use (for agriculture and pasture)?	Livelihood Sources		9	X							X	X	X	X				X	X	X			X
I am cultivating on treasury land. Will I be able to receive a compensation if it is within the motorway site?	Livelihood Sources	17	1		X																		
Will our private parcels be affected? How?	Livelihood Sources		5		X						X				X					X			X
Will our treasury, pasture and other common lands be affected?	Livelihood Sources		2						X						X								
Will our houses be affected?	Resettlement	1	1												X								
What are the Project's benefits?	The Project	2	2															X	X				
Will the motorway pass through the village/neighborhood?	Traffic	2	1							X													
Will the traffic density increase?	Traffic		1										X										
Will there be a reduction in water resources? Will they be polluted?	Water Resources	1	1											X									

Table A.3. Mukhtars' Opinions/ Questions/ Requests

Settlement	Mukhtars Comments on the Project	Type of Comment
Akarca	<ul style="list-style-type: none"> It is essential to have access roads to Buyukkisla settlement due to strong social ties (relatives) and business relations. Adequate number of underpass should be established. Sufficient number of culverts need to be established, since livestock grazing is critical for the PAPs' livelihoods. 	Grievance
Baglama town	<ul style="list-style-type: none"> Motorway will be beneficial. Potential areas for community investment (i.e. sports facilities) were indicated. 	Request
Bogazkoy	<ul style="list-style-type: none"> There have been issues with land consolidation, and access to GDAR and implementing agency is challenging. Engagement with public agencies is limited. 	Grievance
Bozkir	<ul style="list-style-type: none"> Main issues are with water infrastructure. Access to Kizilirmak river water supply would be beneficial. Need for sewage and water supply system improvements were indicated. 	Request
Evren	<ul style="list-style-type: none"> Sufficient number of underpasses with adequate size should be established. 	Grievance
Gokcehuyuk	<ul style="list-style-type: none"> Expropriation access roads may cause tensions within the community. Quality of access roads is essential. Adequate number of culverts need to be built. A grievance box should be set up. 	Grievance
Hacilar	<ul style="list-style-type: none"> No comment 	N/A
Harmandali	<ul style="list-style-type: none"> No reported issues with the Motorway. Our major concern/grievance is on land consolidation implementations (conducted by the GDAR). Land consolidation caused loss of 1.5 hectare land which could have been avoided if expropriation was implemented. There should be an expropriation instead of land consolidation. Land consolidation impacted boreholes; two boreholes are lost because of LC. Moreover, offered land is further away from the settlement. Applied to Court to impede land consolidation implementations. There are also other villages which have also applied to the court. These are: Bozkir, Ciftevi and Sariyahsi. 	Grievance
Hasakoy	<ul style="list-style-type: none"> Local procurement opportunities should be disclosed at village level. Local producers may benefit from Project's local procurement. The settlement has capacity to be a supplier for procurement on dairy and meat products, groceries etc. 	Request
Karagedik Ercan	<ul style="list-style-type: none"> Construction was recently started. The settlement is expecting benefits from the Motorway construction. 	Request
Kuyulutatlar	<ul style="list-style-type: none"> Impact on pumped water supply need to be addressed in detail and information need to be disclosed on water supply impacts. 	Grievance
Kumbet	<ul style="list-style-type: none"> There is existing blood feud issues among the families. Compensation for physical displacement need to include users without deed to their owned property not only the land owners. 	Grievance
Osmanli	<ul style="list-style-type: none"> No comment. 	N/A
Ozancik	<ul style="list-style-type: none"> Access to water supply from Kizilirmak River would benefit the settlement. 	Request
Sariyahsi	<ul style="list-style-type: none"> Motorway causes land division, it is essential to build sufficient underpasses in order to access lands on the other side of the Motorway. Land consolidation conducted by GDAR, especially land allocation after consolidation is not objective. PAPs lost productive lands; and negative sentiments towards the Project is caused by adverse land consolidation impacts. Project should have followed expropriation rather than land consolidation. 	Grievance
Yazicayir	<ul style="list-style-type: none"> Project Company should engage with PAPs, and set up effective communication channels with Mukhtars and visit the settlements. A grievance box would be beneficial for grievances. 	Request Grievance
Yeniyapancarsak	<ul style="list-style-type: none"> Settlement is very close to Motorway's access road, and may be adversely impacted from road construction, overall health and safety. Access road design need to consider vicinity to settlements. 	Grievance
Yildiztepe	<ul style="list-style-type: none"> The settlement has local employment expectations. There should be regular consultations (engagement) with Mukhtar. 	Opinion Request
Yoreli	<ul style="list-style-type: none"> Access to the agricultural lands should be provided. Settlement's water supply was interrupted during Motorway construction. Grievance on this matter was filed to Project Company, but no response was received after 10 days. 	Request Grievance

Table A.4. Public Stakeholder Information Requests

Key Institutions	Land Consolidation	Traffic	Local Economy	Livelihood Sources	Community Health and Safety	Loss of Income	Infrastructure
Aksaray Municipality				✓		✓	
Bala Municipality	✓			✓			
Derinkuyu Municipality		✓					
Evren Directorate of Agriculture	✓	✓					
Evren Municipality		✓	✓				
Golbasi Directorate of Agriculture	✓						
Golbasi Governorship		✓			✓		
Golbasi Municipality	✓	✓					
Gulagac Governorship		✓			✓		
Kulu Municipality	✓						
Ortakoy Directorate of Agriculture	✓		✓				
Ortakoy Governorship	✓		✓				
Ortakoy Municipality	✓		✓				
Sariyahsi Municipality	✓						
Sereflikochisar Directorate of Agriculture				✓			
Sereflikochisar Governorship							✓
Sereflikochisar Municipality			✓				

Appendix B Detailed Stakeholder List

Level	Category	Organization / Entity		
Internal	Personnel	ERG Otoyol Yatırım ve İşletme A.Ş. (Project Company)		
	Contractors	ERG Construction, Pi Makina, others.		
	Shareholders	ERG Construction, Seza Construction		
National	Ministries and Relevant Authorities	Ministry of Transport, Maritime Affairs and Communication		
		General Directorate of Highways (Project Owner)		
		Ministry of Environment and Urbanization		
		Ministry of Culture and Tourism		
		Ministry of Food, Agriculture and Livestock		
		General Directorate of Preservation of Natural Heritage		
			General Directorate of Agriculture Reform	
	NGO's		Environment Foundation of Turkey	
			World Wide Fund for Nature Turkey (WWF)	
			Turkish Foundation for Combating Soil Erosion for Reforestation and the Protection of Natural Habitats (TEMA)	
			The Union of Chambers and Commodity Exchanges of Turkey (TOBB)	
			Union of Turkish Roads, Buildings and Construction Workers (YOL-IS)	
			Chambers of Commerce and Industry	
			The Union Chambers of Turkish Engineers and Architects (TMMOB)	
			The Union of Chambers of Merchants and Artisans	
		Media		National News agencies
				National media
Local	Governmental / Local Authorities and Agencies	Golbasi District Governorship		
		Bala District Governorship		
		Kulu District Governorship		
		Sereflikochisar District Governorship		
		Evren District Governorship		
		Seriyahsi District Governorship		
		Agacoren District Governorship		
		Ortakoy District Governorship		
		Gulsehirdistrict Governorship		
		Gulagac District Governorship		
		Acigol District Governorship		
		Derinkuyu District Governorship		
		Golbasi Municipality		
		Bala Municipality		
		Kulu Municipality		
		Sereflikochisar Municipality		
		Evren Municipality		
		Seriyahsi Municipality		
		Agacoren Municipality		
		Ortakoy Municipality		
		Gulsehirdistrict Municipality		
		Gulagac Municipality		
		Acigol Municipality		
		Derinkuyu Municipality		
		Golbasi District Directorate of Agriculture		
		Bala District Directorate of Agriculture		
		Kulu District Directorate of Agriculture		
		Sereflikochisar District Directorate of Agriculture		
		Evren District Directorate of Agriculture		
		Seriyahsi District Directorate of Agriculture		
		Agacoren District Directorate of Agriculture		
		Ortakoy District Directorate of Agriculture		
		Gulsehirdistrict Directorate of Agriculture		
Gulagac District Directorate of Agriculture				
Acigol District Directorate of Agriculture				

Level	Category	Organization / Entity
		Derinkuyu District Directorate of Agriculture
		Ankara Provincial Governorship
		Aksaray Provincial Governorship
		Niğde Provincial Governorship
		Konya Provincial Governorship
		Nevşehir Provincial Governorship
		Kırşehir Provincial Governorship
		Ankara Provincial Directorate of Culture and Tourism
		Aksaray Provincial Directorate of Culture and Tourism
		Niğde Provincial Directorate of Culture and Tourism
		Konya Provincial Directorate of Culture and Tourism
		Nevşehir Provincial Directorate of Culture and Tourism
		Kırşehir Provincial Directorate of Culture and Tourism
		Ankara Provincial Directorate of Agriculture
		Aksaray Provincial Directorate of Agriculture
		Niğde Provincial Directorate of Agriculture
		Konya Provincial Directorate of Agriculture
		Nevşehir Provincial Directorate of Agriculture
		Kırşehir Provincial Directorate of Agriculture
		Hacılar Mukhtar
		Ballıkpınar Mukhtar
		Yavrucuk Mukhtar
		Gökçehüyük Mukhtar
		Karagedik Mukhtar
		Tepeyurt Mukhtar
		Mahmatlı Mukhtar
		Mahmatlıbahçe Mukhtar
		Bağçı Mukhtar
		Yörelî Mukhtar
		Ahmetçayırı Mukhtar
		Emirler Mukhtar
		Yeniyapançarsak Mukhtar
		Hanburun Mukhtar
		Derekışla Mukhtar
		Belçarsak Mukhtar
		Sofular Mukhtar
		Köşker Mukhtar
		Yazıçayır Mukhtar
		Aktaş Mukhtar
		Doğankaya Mukhtar
		Akarca Mukhtar
		Büyükkışla Mukhtar
		Yusufkuyusu Mukhtar
		Büyükdamlacık Mukhtar
		Acıöz Mukhtar
		Şanlıkişla Mukhtar
		Acıkuyu Mukhtar
		Kaçarlı Mukhtar
		Gülhüyük (Muhlisobası) Mukhtar
		Kıyevi (Şerefildavutlu) Mukhtar
		Cebirli Mukhtar
		İnebeyli Mukhtar
		Yusufoşağı Mukhtar
		Kürtü (Altınbaşak) Mukhtar
		Solakuşağı Mukhtar
		Çatalpınar (Çerkezuşağı) Mukhtar
		Evren (Çıkınağıl) Mukhtar
		Sarıyahşi Mukhtar
		Boğazköy Mukhtar
		Kütüklü Mukhtar

Level	Category	Organization / Entity
		Harmandalı Mukhtar
		Devedamı Mukhtar
		Çiftevi Mukhtar
		Salariyalaca Mukhtar
		Gökler Mukhtar
		Bozkır Mukhtar
		Sarıkaman Mukhtar
		Pirli Mukhtar
		Durhasanlı Mukhtar
		Kümbet Mukhtar
		Çatın Mukhtar
		Ozancık Mukhtar
		Ovaören Mukhtar
		Babakonağı Mukhtar
		Karakova Mukhtar
		Alayhanı Mukhtar
		Süleymanhüyüğü Mukhtar
		Düğüz (Osmanlı) Mukhtar
		Gülpınar Mukhtar
		Bekarlar Mukhtar
		Kurugöl Mukhtar
		Gösterli Mukhtar
		Hasaköy Mukhtar
		İnli Mukhtar
		Pınarcık Mukhtar
		Kuyulutatlar Mukhtar
		Kayırlı Mukhtar
		Yazıhüyük (Bozkır) Mukhtar
		Kileredere (Hürriyet) Mukhtar
		Bağlama (Cumhuriyet) Mukhtar
		Bekdik Mukhtar
		Saraycık Mukhtar
		Kocabey Mukhtar
		Güzler Mukhtar
		Kuşdili Mukhtar
		Yenice Mukhtar
	NGO's	Ankara Chambers of Commerce and Industry
		Aksaray Chambers of Commerce and Industry
		Niğde Chambers of Commerce and Industry
		Konya Chambers of Commerce and Industry
		Nevşehir Chambers of Commerce and Industry
		Kırşehir Chambers of Commerce and Industry
		Ankara Chambers of Merchants and Artisans
		Aksaray Chambers of Merchants and Artisans
		Niğde Chambers of Merchants and Artisans
		Konya Chambers of Merchants and Artisans
		Nevşehir Chambers of Merchants and Artisans
		Kırşehir Chambers of Merchants and Artisans
	Directly affected settlement	Hacılar
		Ballıkpınar
		Yavrucuk
		Gökçehüyük
		Karagedik
		Tepeyurt
		Mahmatlı
		Mahmatlıbahçe
		Bağıçı


Level	Category	Organization / Entity
		Yörelî
		Ahmetçayın
		Emirler
		Yeniyapançarsak
		Hanburun
		Derekışla
		Belçarsak
		Sofular
		Köşker
		Yazıçayır
		Aktaş
		Doğankaya
		Akarca
		Büyükkışla
		Yusufkuyusu
		Büyükdamlacık
		Acıöz
		Şanlıkışla
		Acıkuyu
		Kaçarlı
		Gülhüyük (Muhlisobası)
		Kıyivevi (Şerefli davutlu)
		Cebirli
		İnebeyli
		Yusufuşağı
		Kürtü (Altınbaşak)
		Solakuşağı
		Çatalpınar (Çerkezuşağı)
		Evren (Çıkınağıll)
		Sarıyahşi
		Boğazköy
		Kütüklü
		Harmandalı
		Devedamı
		Çiftevi
		Salariyalaca
		Gökler
		Bozkır
		Sarıkaman
		Pirli
		Durhasanlı
		Kümbet
		Çatın
		Ozancık
		Ovaören
		Babakonağı
		Karakova
		Alayhanı
		Süleymanhüyüğü
		Düğüz (Osmanlı)
		Gülpınar
		Bekarlar
		Kurugöl
		Gösterli
		Hasaköy
		İnli
		Pınarcık
		Kuyulutatlar
		Kayırlı
		Yazihüyük (Bozkır)

Level	Category	Organization / Entity
		Kileredere (Hürriyet)
		Bağlama (Cumhuriyet)
		Bekdik
		Saraycık
		Kocabey
		Güzler
		Kuşdili
		Yenice
	Communities that will be affected from the resettlement	Kümbet settlement (13 households)
		Potentially other settlements (Sarıyahşi, Evren, Gökçehüyük, Yavrucuk, Yazılıhüyük, Hasaköy, İnlı)

Appendix C Grievance/Request Form of the Project Company

ERG Otoyol A.Ş. Complaint/Request Registration Form		
Filled in by:		Complaint/Request Registration No:
Type:	Complaint:	Request:
Registration date:		Date of Notification to the Applicant:
Filing Date of Complaint/Request:		
Contact Information of Complaint/Request Owner		
Stakeholder Type:		
First and Last Name:	Phone:	Mobile Phone:
Institution:	Address:	E-Mail:
Form of Notification:		
Petition (to the company)	E-mail	Web page
Phone Petition (3. institution-Institution, Name)	CLO	
Consultations (on-site visits, etc.)	Contractor	
Subcontractor	Other	
Complaint/Request Type:	Environmental	Social
Related settlement:		
Subject of Complaint:		
a. Traffic	i. Working conditions	
b. Dust	j. Contractor activities	
c. Wastes	k. Land access	
d. Pollution (water or soil)	l. Security	
e. Damaged crops (or land)	m. Health and safety	
f. Land acquisition	n. Damaged infrastructure	
g. Asset acquisition	o. Procurement	
h. Noise	p. Other	
Subject of Request		
Summary Information:		
Evaluation of the request (CLO):		
Related Unit:	Date of Submission to the Related Unit:	
EHS	Administrative Affairs	
Construction site	HR Finance	
Security	Contractor	
Other		
Comment by the Unit evaluating the request:	Response Date of the Relevant Unit:	

Appendix D Grievance Link on Project Company's Website



ANA SAYFA KURUMSAL PROJE BİZDEN HABERLER MEDYA ŞİKAYET&ÖNERİ İLETİŞİM

Konya Yolu 23. Km. Göllübaşı - Ankara / Türkiye 0312 484 08 00 Bilgi ve İletişim Hatları

Şikayet ve Öneri


Complaint and Recommendations

İletişim

İletişim Bilgileri

Dilek, Şikayet ve Önerileriniz

Karlıyer / Açık Pozisyonlar



Dilek Şikayet ve Önerileriniz

Request Complaint and Recommendations

Sizlere daha iyi bilgi verebilmemiz için, Proje dahilinde bizlere sormak istediğiniz ayrıca şikayet ve önerileriniz için aşağıdaki formu doldurunuz... Please fill in the below forms for your complaints and recommendations

İsim * Name

Adres * Address

Telefon Numarası * Phone number

E-Posta * E-mail

Şikayet/Öneri Açıklaması

Şikayet/Öneri Türü : Çevresel Sosyal

Şikayet/Öneri Aşaması : İnşaat İşletme


Şikayet/Öneri Nedeni : Toz Oluşumu/Dust Kamulaştırma/Expropriation

Şikayet/Öneriyi Açıklayın

Olay Tarihi, Date of the incident

Belirtilen Sorunun Çözülmesi İçin Ne Yapılmaması İstersiniz ?

Gönder Send



ERG OTOYOL Yatırım ve İşletme A.Ş.

İletişim

Hızlı Erişim

Son Gelişmeler

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