

MERSİN-GAZİANTEP RAILWAY PROJECT



STAKEHOLDER ENGAGEMENT PLAN



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MERSİN GAZİANTEP HIGH STANDARD TRAIN PROJECT

STAKEHOLDER ENGAGEMENT PLAN (FINAL DRAFT)

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1 INTRODUCTION

Stakeholder Engagement Plan (SEP) of the Mersin-Gaziantep Train Project as part of the ESIA process.

SEP will be developed to ensure the process of interaction with the external stakeholders in the course of implementation of the Mersin-Gaziantep Train Project in compliance with the requirements of the Turkish national law/regulations and the International Finance Corporation (IFC) Performance Standards on Social and Environmental Sustainability.

As described in the IFC Performance Standard 1, the purpose of the SEP is to establish and maintain positive relationships with external stakeholders (i.e. individuals, communities, local government authorities, or other interested/affected parties) over the lifetime of the project.

The SEP also includes a grievance mechanism for community members and other stakeholders to raise any concerns and problems related to the Project.

Stakeholder engagement is an ongoing process, and the SEP will be regularly monitored and updated throughout all stages of the Mersin-Gaziantep Train Project implementation.

1.1 Scope of the Project

Scope of the Stakeholder Engagement Plan is;

- Determining the legal framework,
- Determination of stakeholders,
 - Determination of settlements and areas adjacent to Mersin-Gaziantep High Standard Train Project,
 - Determination of local and international non-governmental organizations,
 - Determination of hospitals and emergency institutions,
 - Determination of public institutions,
 - Determination of non-public stakeholders,
 - Identification of other institutions, organizations and individuals,
 - Determining the Policy,
 - Human Resources Management,
- Determining the stakeholders' participation approaches to the activity
- Determining activities that can be carried out with stakeholders
- Determining the level of informing the stakeholders and methods of informing them
- Determining the grievance mechanism
- Staff training and assignment of responsibilities
- Determination of record keeping and reporting structure

1.2 Objective of the Project

The SEP will be developed with the aim of explaining how the Project Company will communicate with all stakeholders, that is, people, institutions and organizations who might affect/be affected by or interested in the Project. The main objective of the SEP is to define a technically and culturally appropriate approach to consultation and disclosure.

The main objectives of the SEP are therefore to:

- Identify all stakeholders that may be directly/indirectly affected from or affect the Project,
- Provide timely, relevant, accessible, and easily understood information to stakeholders in an appropriate non-technical format,

- Foster strong project community relationships,
- Specify procedures and methodologies for stakeholder consultations,
- Build and maintain relationships between the Project and stakeholders through open dialogue,
- Provide opportunity for all stakeholders to express their opinions and concerns,
- Ensure a technically and culturally appropriate approach to engagement with all stakeholders,
- Establish a grievance mechanism for all stakeholders.

2 ACTIVITY INFORMATION

The agreement signed between The Republic of Turkey State Railways (TCDD) and REC International Construction Investment Industry and Trade Inc. under Rönesans Holding (Rönesans Holding will be named as Rönesans in rest of the report) within the scope of the High Standard Railway Line Construction and Electromechanical Systems Installation Project, an Environmental and Social Impact Assessment Report was prepared for the Environmental and Social Evaluation of the High Standard Train Project.

Two High Standard Railways have been planned between Mersin and Gaziantep provinces and the construction has started but could not be completed. Rönesans will complete the remaining works for the rail system and continuous transportation will be provided between Mersin and Gaziantep. In this context, two (2) new railways will be constructed between Mersin and Adana in addition to the current railway. In following part of the line, current line will be extended with High Standard Railway Line. The detailed explanation of the works to be performed by Rönesans is given in the project description section.

2.1 Project Area and Vicinity

The High Standard Train Project is between Mersin-Gaziantep provinces and passes through Mersin-Adana-Osmaniye-Gaziantep (Başpınar). The route proceeds as Mersin-Adana-Toprakkale-Bahçe-Nurdağ-Başpınar, respectively (see Table 2.1).

Table 2.1: Cities and District in the Vicinity throughout the Railway Line

Province	Districts
Mersin	Akdeniz
	Tarsus
	Toroslar
Adana	Seyhan
	Yüreğir
	Sarıçam
	Ceyhan
Osmaniye	Toprakkale
	Center
	Düziçi
	Bahçe
Gaziantep	Nurdağ
	Pazarcık
	Şehitkamil

2.1.1 Industrial and Commercial Areas

The High Standard Train Project is between Mersin-Gaziantep provinces and passes through Mersin-Adana-Osmaniye-Gaziantep (Başpınar). There are many industrial and commercial areas along the Railway Line especially in the Mersin Province.

3 LEGAL FRAMEWORK

The Stakeholder Engagement Plan (SEP) aim to guide The Project Management Department on how to continuously and constructively involve stakeholders in the project management process. According to this scope, both national and international legal framework have a binding force.

3.1 National Legislation

The Turkish environmental legislation is in parallel with the EU Legislation due to the Turkey's harmonization process to EU. The baseline for the environmental impact of this Project is the Environmental Law No. 2872 (Official Gazette dated 11.08.1983 and numbered 18132). On the other hand, the EIA principles and procedures are detailed in the Environmental Impact Assessment Regulation (last version: Official Gazette dated 25.11.2014 and numbered 29186).

3.2 International Standards

Performance Standards based on Equator Principles follow an effective policy to inform the Parties at every stage of project activity and ensure their active participation in the process. It is essential to inform the public that clear, distinct and accurate information should be shared with the relevant persons at the appropriate time.

Performance Standards for the Client to meet throughout the life of an investment. To manage environmental and social risks and impacts so that development opportunities are enhanced, the Client will follow the PS's. These are;

- Identification of stakeholders,
- Informing stakeholders about possible impacts of the project,
- Ensuring effective participation of stakeholders in the process,
- Creating an action plan covering vulnerable people,
- Establishing a grievance mechanism for the continuity of information exchange and participation,
- Execution of follow-up, monitoring and evaluation activities that will ensure the continuity of the grievance mechanism,
- Detection and management of potential negative effects in advance,
- Keeping the grievance mechanism active for unforeseen circumstances,
- Reporting to be done in a certain frequency and continuous manner.

As for the SEP the IFC Sustainability Framework: Policy and Performance Standards on Environmental and Social Sustainability is being followed. It outlines a systematic approach to stakeholder engagement that will help investors build and maintain over time a constructive relationship with their stakeholders, in particular the locally affected communities.

As stated in IFC Performance Standard 1 - Environmental and Social Risk and Affect Assessment and Management, stakeholder engagement is the basis for building strong and constructive relationships in the successful management of environmental and social effects of a project.

As per the IFC standards, engagement of stakeholders is a continuous process with changing grades, stakeholder engagement consists of analyzing and planning stakeholders, informing stakeholders, establishing consultation and participation, creating a grievance mechanism, and continuously reporting to Affected Communities. The form, frequency and effort level of stakeholder engagement should be appropriate to the development stage with the risks and adverse effects that the project creates (IFC, 2012:6).

In this respect, an Environmental and Social Impact Assessment ESIA Report has been prepared to meet the requirements of the IFC performance standards.

3.3 Roles and Responsibilities

The primary responsibilities of the Client are to coordinate stakeholder engagement activities and to support the stakeholders during the Project activities. The following are core tasks of the Client in the stakeholder engagement process;

- External communication system; to inform the stakeholders about the Project progress,
- Meeting; to public disclosure or information,
- Registration; to follow grievances and complaints,
- Tracking and Monitoring; to ensure fulfillment of the commitments,
- Social management programs; to ensure sustainability of the social benefit,
- Social investment programs; to contribute the PSIA particularly vulnerable groups.

4 STAKEHOLDER ENGAGEMENT

4.1 Approach

The SEP outlines a systematic approach to stakeholder engagement that will help Client to develop and maintain a constructive relationship with their stakeholders during all stages of the Mersin-Gaziantep Railway Project.

IFC defines stakeholder engagement as follows: “the term “stakeholder engagement” is emerging as a means of describing a broader, more inclusive, and continuous process between a company and those potentially impacted that encompasses a range of activities and approaches, and spans the entire life of a project”

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In this respect, an ESIA Report has been prepared to meet the requirements of the IFC performance standards.

4.2 Identification of Stakeholders

Stakeholder identification is a key step in managing the overall stakeholder engagement process

IFC defines stakeholder as follows: “Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. Stakeholders may include locally affected communities or individuals and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organizations and groups with special interests, the academic community, or other businesses” (IFC,2007:10).

In this respect, a comprehensive list of stakeholders has been prepared for the Mersin-Gaziantep Railway Project. Stakeholders have been identified as the following bullets and within the Table 4.1

- Project affected settlements,
- Vulnerable groups in the PSIA,
- Local authorities,
- Municipalities,
- Social services providers,
- Trade unions,
- Universities,
- Heads of village (Mukhtars)
- Non-Governmental Organizations
- Local media

The potential stakeholders should be categorized according to the interaction of the stakeholder with the Project and its related activities, and the level of the interaction of the stakeholder. The interaction of the

stakeholder with the Project could be positive, negative or neutral. Besides, the interaction level could be low, medium or high. As a result, interaction of a stakeholder with Project can be treated as multifaceted. (See Figure 4.1).

Level of the Interaction		Type of Interaction		
		A Positive	B Neutral	C Negative
1	High	A1	B1	C1
2	Medium	A2	B2	C2
3	Low	A3	B3	C3

Figure 4.1: Identification of Stakeholder According to Interaction Condition

Table 4.1: Expected Interaction Levels by Stakeholders

Type of Interaction	Level of Interaction	Consequence Level	Community Stakeholders	Identification	Strategic Objective
Positive	High	A1	Governorate	Regional authority	Possible participation in the implementation of the project
Positive	High	A1	District Governorate		
Positive	High	A1	Municipalities		
Positive	High	A1	Mukhtar	Local authority	Possible representation of the project affected people in local level
Positive	Medium	A2	Universities	Representatives of potential beneficiary	Possibility to influence and make decisions and/or have an interest in the Project
Positive	Medium	A2	Public Institutions / Public Services Providers	Authorities	Possible participation in the implementation of the project
Positive	Medium	A2	Chambers, Unions and Development Agencies	Decision makers	Possibility to influence and make decisions and/or have an interest in the Project
Negative	Medium	C2	Associations and NGOs	NGOs that may be interested in project	Vulnerable people and social groups that may be more negatively affected by the Project
Neutral	Low	B3	Local Media	Representatives of local communication	Possibility to have an interest in the Project

Vulnerable groups will be a part of the stakeholder identification plan. Vulnerable groups/people in the Project area will be identified through the socio-economic study conducted as part of the ESIA studies. The Project will identify and consult specifically with potentially vulnerable groups such as women headed households, women, poor, disabled and elderly people. Special meetings for vulnerable groups; e.g. women meetings will be held on village level to make sure that their concerns are addressed as well. It is important to note that a special effort will be made to identify who are the most vulnerable among the potentially affected and are special engagement efforts necessary.

4.3 Identification of Communication and Informing Channels

Public disclosure is one of the main steps of stakeholder engagement. Verbal, written and visual sources could be used as the informing tools. The most important verbal sources are meetings, which could be organized in a several periods. Brochures, leaflets, posters and advertisement are both written and visual tools to inform. Besides, the official website could contain different information sources. In this sense, the website is the most useful and effective mechanism of communication, inform and disclosure.

The disclosure mechanisms are shown in Table 4.2. Each of mechanism were classified according to receiver (or audience) and project phases.

Table 4.2: Identification of Communication and Informing Channels

Disclosure Mechanism	Tools	Audience (√_Yes, Ø_No)		Project Phase
		Project Affected Persons	Institutions	1-Pre-Construction 2-Construction 3-Operation 4-Disclosure
Human Resources Office	Branch of Project Information	√	Ø	1,2,3
	Branch of Social Responsibility	Ø	√	3,4
Meetings	Public Participation Meetings	√	√	1,2,3
	Face to face Meetings	√	√	1,2,3
	Online Meetings	√	√	1,2,3
	Ad hoc workshops	√	√	1,2,3
	Focus Group Discussion	√	Ø	1,2
Written / Visual Document	Brochure / Leaflet	√	√	1,2,3
	Posters	√	√	1,2,3
	Advertisement	√	√	1,2,3
Internet Sources	Project website	√	√	1,2,3
	Official accounts on social media	√	√	1,2,3

4.4 Preliminary Works

4.4.1 Public Participation Meetings

Pursuant to the Article 9 of the Turkish EIA Regulation (MoEU 2014, 29186), Public Participation Meetings (PPMs) were held to inform the public about the Project. In that regard, four PPM were held in Osmaniye, Gaziantep and Adana, respectively. The first PPM was held as of 2010 and the last one was in 2011. . The details of the PPMs are given in Table 4.3

Table 4.3: Completed PPMs

	Province	District	Date
1	Osmaniye	Bahçe	20.07.2010
2	Gaziantep	Nurdağı	21.07.2010
3	Osmaniye	Toprakkale	11.05.2011
4	Adana	Ceyhan	12.05.2011

4.5 Findings and Results of the Stakeholder Interviews

4.5.1 Consultation with Institutions

In December 2020, 30 institutions were interviewed. 11 of the meetings of this institution were conducted in Mersin, 9 in Adana, 6 in Osmaniye and 4 in Gaziantep. The majority of the interviews (11) were conducted with representatives of metropolitan municipalities and district municipalities. 9 interviews were conducted in other public institutions, and 6 of them are institutions related to the Ministry of Transport (see Table 4.5).

Table 4.4: Distribution of Institution Interviews Results by Province

	Positive	%	Negative	%	Number of Interviewed Institution	%
Mersin	7	31.8	4	50.0	11	36.7
Adana	7	31.8	2	25.0	9	30.0
Osmaniye	4	18.2	2	25.0	6	20.0
Gaziantep	4	18.2	0	0.0	4	13.3
Total	22	100.0	8	100.00	30	100.0

Because of the Covid-19 pandemic, institutions affiliated with the Ministry of Health specifically declined to interview.

In connection with the publication of the 31225 numbered and dated 26 August 2020 Presidential Circular on the application of flexible working methods such as remote work, alternating work and administrative permission for employees in public institutions and organizations, it was not possible to conduct face-to-face interviews.

Table 4.5: Interviews with the Institutions and the Interview Results

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
1	Chambers, Unions and Development Agencies	Mersin	Akdeniz	Mersin Chamber of Commerce and Industry	Manager of the Projects	<ul style="list-style-type: none"> There is a need to connection to the airport 	Positive	Medium	A2
2	Municipalities	Mersin	Akdeniz	Mersin Metropolitan Municipality Transportation Department	Transportation Engineer	<ul style="list-style-type: none"> Local governments and the Ministry of Transportation should work in a coordination manner. The planned project needs to be integrated into the Transport Master Plan. 	Positive	High	A1
3	Governorates	Mersin	Akdeniz	Mersin Governorate	Deputy Governor	<ul style="list-style-type: none"> A coordination meeting should be held on a provincial basis, with representatives of all public institutions. 	Positive	High	A1
4	Associations and NGOs	Mersin	Tarsus	Tarsus Branch of Turkish Disabled Association	Chairman of the Association	<ul style="list-style-type: none"> Disabled people, like everyone else, should be able to benefit from the project. For example, elevators for disabled people can be made. 	Negative	Medium	C2
5	Associations and NGOs	Mersin	Tarsus	Tarsus Branch of the Autism Association	Chairman of the Association	<ul style="list-style-type: none"> Problems such as traffic congestion, narrowing of roads, parking problems may increase. 	Negative	High	C1
6	Associations and NGOs	Mersin	Tarsus	Tarsus Visually Impaired Association	Vice President	<ul style="list-style-type: none"> Accessibility issues for the visually impaired should be resolved. For example, an audible alarm / signalization system can be installed in train traffic system. 	Negative	High	C1
7	Municipalities	Mersin	Tarsus	Tarsus Municipality	Mayor and Deputy Mayor	<ul style="list-style-type: none"> In order for the Project to be useful, it should go underground. Going above ground increases the cost of the project a lot. The Project's location can changes the future of the city. There is a third-degree site area in the city center. The city center of Tarsus is a very busy area from a logistical point of view. 	Negative	High	C1
8	Public Institutions / Public Services Providers	Mersin	Akdeniz	TCDD Gar Directorate	Deputy Manager	<ul style="list-style-type: none"> The light rail system problem also needs to be solved. 	Positive	Medium	A2
9	Local Media	Mersin	Akdeniz	Güney Newspaper	Editor	<ul style="list-style-type: none"> Transportation traffic and traffic for tourism use the same route. There is no alternative transportation on the east-southeast route. New projects will provide an alternative. In the region, there is an inequality of opportunity in education. Support for 	Positive	Medium	A2

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
						education can be provided for rural and low-income settlements.			
10	Public Institutions / Public Services Providers	Mersin	Akdeniz	Mersin Provincial Directorate of Environment and Urbanisation, Branch of Zoning Planning	Manager	<ul style="list-style-type: none"> When establishing a transport system, aviation, marine and land transport must be integrated. Problems can arise when there is a disconnect. 	Positive	Medium	A2
11	Public Institutions / Public Services Providers	Mersin	Akdeniz	Directorate of TCDD Mersin Port Authority	Deputy Manager	<ul style="list-style-type: none"> Access of the Project to Taşucu Port reduces road traffic density. The port's capacity can increase. Because the port's stockpiling site will be inadequate in the future. Transporting cargo by train can reduce the port's density. 	Positive	Medium	A2
12	Municipalities	Adana	Seyhan	Adana Metropolitan Municipality Head of Projects Department	Head of Department	<ul style="list-style-type: none"> Underpasses and overpasses at junction points need to be well planned. It would make sense if the railway route extended to Ankara. 	Positive	Medium	A2
13	Chambers, Unions and Development Agencies	Adana	Seyhan	Çukurova Development Agency, Investment Support Office	Expert and Coordinator	<ul style="list-style-type: none"> A participation meeting should be held with all stakeholders. Information meetings and workshops should be organized. 	Positive	Medium	A2
14	Municipalities	Adana	Seyhan	Seyhan District Municipality	Deputy Mayor	<ul style="list-style-type: none"> Investments in Adana have shifted to surrounding provinces such as Osmaniye and Gaziantep. Transport investments increase cultural and tourism activities. 	Positive	High	A1
15	Municipalities	Adana	Çukurova	Adana Metropolitan Municipality, Head of Transportation Department-Directorate of Rail Systems	Manager	<ul style="list-style-type: none"> Government transport projects appear to be more profitable than those of private companies are. 	Positive	Medium	A2
16	Chambers, Unions and Development Agencies	Adana	Seyhan	Adana Chamber of Industry	General Secretary	<ul style="list-style-type: none"> It is useful combined with existing High Standard Train Lines. Communication should be made with our institution about social investment projects. 	Positive	Medium	A2
17	Public Institutions / Public Services Providers	Adana	Seyhan	Adana Regional Directorate of TCDD Transportation Incorporated Company, Directorate of Services	Principal deputy assistant	<ul style="list-style-type: none"> Connection should also be provided in terms of cargo transportation. 	Positive	Medium	A2
18	Public Institutions / Public Services Providers	Adana	Seyhan	Adana 6 th Regional Directorate of TCDD, Railway Maintenance Service, Branch of Superstructure	Engineer	<ul style="list-style-type: none"> Tourism potential increases if the train line extends to Silifke. Access roads to Adana-Yumurtalık-Karataş regions are in insufficient condition. If transport develops here, 	Positive	High	A1

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
						development is achieved in terms of tourism. Thereby, dependence on Mersin on marine tourism decreases.			
19	Public Institutions / Public Services Providers	Adana	Seyhan	Adana 6 th Regional Directorate of TCDD, Railway Maintenance Service	Assistant Service Manager	<ul style="list-style-type: none"> There are agricultural activity areas along the project route. There are concerns about expropriation. Local people in these areas need to be particularly informed. 	Negative	Medium	C2
20	Municipalities	Adana	Ceyhan	Ceyhan District Municipality, Directorate of Mukhtar Affairs	Responsible Manager	<ul style="list-style-type: none"> The work in Ceyhan stopped due to the some legal process 	Negative	Low	C3
21	Municipalities	Osmaniye	Central District	Osmaniye Municipality	Deputy Mayor	<ul style="list-style-type: none"> Relations between nearby cities develop, but problems can occur at inner-city crossing points. Both institutions and local people have not acknowledgement about the Project. 	Positive	Low	A3
22	Public Institutions / Public Services Providers	Osmaniye	Central District	Osmaniye Provincial Directorate of Environment and Urbanisation	Deputy Manager	<ul style="list-style-type: none"> If access to the Organized Industrial Zone increases, the industry also develops. Toprakkale region is in the direction of the development of the city, but in distance. Distance will not be a problem if the transport problem is solved. 	Positive	Medium	A2
23	Public Institutions / Public Services Providers	Osmaniye	Central District	Osmaniye Provincial Directorate of Environment and Urbanisation, Directorate of Planning and Settlement	Manager of Branch Office	<ul style="list-style-type: none"> In the Central District of Osmaniye, there must be station. If the station is in Toprakkale, the number of passengers will decrease. For people living in Osmaniye, 5 or 6 km is a long distance. They do not prefer to go to Toprakkale to use the train. 	Negative	Low	C3
24	Municipalities	Osmaniye	Düziçi	Düziçi District Municipality	Deputy Mayor	<ul style="list-style-type: none"> The station has a significance within the district. East-West trains pass through here. Train use is not common as existing trains are delayed. However, it is preferable if there is a high-standard train. High standard trains are an alternative to passenger cars. 	Positive	High	A1
25	Municipalities	Osmaniye	Bahçe	Bahçe District Municipality	Deputy Mayor	<ul style="list-style-type: none"> Because of the high standard train, the overpass was built. Access roads to some villages were blocked. Access to the highway of Savranlı and Çolaklı villages and Hasanbeyli town was cut off. Nowadays they cross over 	Negative	High	C1

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
						the railway track to access the roadway. When the rails are laid, transportation is completely disrupted.			
26	Municipalities	Osmaniye	Nurdağı	Nurdağı District Municipality, Branch of Zoning and Urbanisation	Technician	<ul style="list-style-type: none"> There is no economic activity other than vehicle trading. There is no industrial activities there is no business area in capacity. Livestock is low, while farming is in good condition. Young people are going out of province due to the unemployment If job opportunities are opened to young people, if employment is provided, there will be many who will benefit. 	Positive	High	A1
27	Municipalities	Gaziantep	Şehitkamil	Adana Metropolitan Municipality,	Deputy Mayor	<ul style="list-style-type: none"> Gaziray (light rail system), Metro and high standard rail are parts of an integrated transport system within the Transport Master Plan. 	Positive	High	A1
28	Chambers, Unions and Development Agencies	Gaziantep	Şehitkamil	Silk Road Development Agency	Expert	<ul style="list-style-type: none"> Advantage: contributes to the economy. Gaziantep; van, Urfa, Diyarbakır, Mardin, Şırnak, Kızıltepe, Nusaybin, Birecik, Suruç, Adıyaman is the logistics center for the regions. Disadvantage: It is bad that Gaziantep is the last station. The line is not cut in Gaziantep and it is more useful to connect to lines such as Konya, Adana, and Ankara. 	Positive	High	A1
29	Governorates	Gaziantep	Şehitkamil	Gaziantep Governorate	Deputy Governor	<ul style="list-style-type: none"> Transportation between Mersin and Gaziantep is problematic in both commercial and tourist traffic. A high standard train corrects this situation. 	Positive	High	A1
30	Public Institutions / Public Services Providers	Gaziantep	Şehitkamil	TCDD General Directorate of Infrastructure	Gar Manager	<ul style="list-style-type: none"> It increases the value of where the high standard train passes. High standard rail increases Gaziantep's popularity. There is a very big project like Gaziray. 	Positive	High	A1

4.5.2 Consultation with Mukhtars

In accord with the law no. 6360 on the establishment of the Metropolitan Municipality and the twenty-seven districts and amending certain laws and decrees to the provinces, fourteen in law, which came into force in 2012, the administrative status of towns, villages and quarters in Mersin, Adana and Gaziantep, has changed. Within the framework of this change, settlements in the status of villages become quarters. Therefore, Ceyhan and Şehitkamil districts are on the border of the Metropolitan Municipality, they show rural features.

In metropolitan areas (urban areas) where the population density is high, such as Seyhan, Yüreğir, Akdeniz and Tarsus, the number of quarters is small, and the number of populations of the quarters is high. On the other hand, in districts (rural areas) where the population density is low, such as Düziçi and Nurdağı, the number of villages is high, and the number of populations of the villages is low.

Support will be taken from Mukhtar survey to close this gap between “urban areas” and “rural areas” included in the sample. For this reason, the Mukhtar survey will be conducted in “villages and quarters not in the center of the city /district”, which are considered “rural areas”.

The rural areas were where Mukhtar surveys were conducted in the villages / quarters that are connected to, Ceyhan, Toprakkale, Düziçi, Bahçe, Nurdağı and Şehitkamil districts.

19 mukhtar interviewed was conducted as of December 2020. 9 of the interviews were conducted in Osmaniye, 5 in Adana and 5 in Gaziantep (see Table 4.6)

According to the general results of the mukhtar interviews, 8 of the interviews expressed negative opinions, 7 of the interviews expressed neutral opinions and the remaining 4 interviews expressed positive opinions (see Table 4.7)

Table 4.6: Distribution of Mukhtar Interviews Results by Province

	District	Positive	%	Negative	%	Neutral	%	Number of Interviewed Mukhtar	%
Adana	Ceyhan	1	25.0	2	25.0	2	28.6	5	26.3
Osmaniye	Bahçe	0	0.0	3	37.5	0	0.0	3	15.8
Osmaniye	Düziçi	3	75.0	0	0.0	1	14.3	4	21.1
Osmaniye	Toprakkale	0	0.0	1	12.5	1	14.3	2	10.5
Gaziantep	Nurdağı	0	0.0	2	25.0	1	14.3	3	15.8
Gaziantep	Şehitkamil	0	0.0	0	0.0	2	28.6	2	10.5
Total		4	100.0	8	100.00	7	100.0	19	100.0

Table 4.7: Completed Mukhtar Interviews and the Interview Results

	Province	District	Village Neighborhood /	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
1	Adana	Ceyhan	Çakaldere	The project has no positive or negative impact. It is a state Project. I know that expropriations have been made and payments have been received.	Neutral	Low	B3
2	Adana	Ceyhan	Kuzucak	The project has no impact.	Neutral	Low	B3
3	Adana	Ceyhan	Toktamiş	There were two levels at the crossing. One of them needs to be shut down.	Negative	Low	C3
4	Adana	Ceyhan	Küçükburhaniye	Traffic is blocked when the freight train passing through Ceyhan and the passenger train passes through it are closed (<i>during the train crossing</i>). If the freight train breaks down, it gets very busy for hours. A patient cannot go to Adana from the surrounding hospital.	Negative	High	C1
5	Adana	Ceyhan	Çokçapınar	The devices were put for dust measurement noise measurements. They told us the route.	Positive	Low	A3
6	Osmaniye	Bahçe	Savranlı	The asphalt is broken. We met with the construction masters. The road to and from the village was closed due to the train (<i>Aygır-Hasanbeyli-Çolaklı</i>). We wonder if it will be connected because the road to the village is cut off.	Negative	High	C1
7	Osmaniye	Bahçe	Nohut	The available land of the village is very limited.	Negative	High	C1
8	Osmaniye	Bahçe	Burğaçlı	The water drawn from the source (headwater or spring) in the village dried up. Payanlı neighborhood, which is located between Yarbaşı and Taşoluk. There were 30-40 houses, and when the waters from their springs passed through the tunnel. The waters of the neighborhoods have dried up. The orchards are dry. The houses are flooded with tanks.	Negative	High	C1
9	Osmaniye	Düziçi	Çamiçi	We have knowledge about neither the Project nor expropriation.	Neutral	Low	B3
10	Osmaniye	Düziçi	Akçakoyunlu	In terms of employment, it benefits everywhere economically.	Positive	High	A1
11	Osmaniye	Düziçi	Bostanlar	No one uses many trains, but we'd be happy for the train to pass through here.	Positive	Medium	A2
12	Osmaniye	Düziçi	Yazlamazlı	The tunnel is being built. The work continues. Our villagers are very curious about where the line will pass.	Positive	Medium	A2
13	Osmaniye	Toprakkale	Karataş	I have neither knowledge nor idea. I just think it would be good for the country.	Neutral	Low	B3
14	Osmaniye	Toprakkale	Kışla	A level crossing (uncontrolled) is closed in the neighborhood. The neighborhood revolted. They put up a concrete barrier. A citizen comes and goes in other ways.	Negative	High	C1
15	Gaziantep	Nurdağı	Aslanlı	There is a construction site across from my village, but no one's debriefing. Moreover, the chief who works at the construction site doesn't know anything. We can't find an interlocutor to ask questions.	Negative	High	C1

	Province	District	Village Neighborhood /	Main Issue(s) of the Interview	Type Interaction	Level of Interaction	Consequence Level
				Gar will be with us, we know the stop will be here, but there are no people to ask questions. There's a construction site, the tunnel is being worked, but we don't even know how many workers are on the construction site.			
16	Gaziantep	Nurdağı	Sakçagözü	The project did not enter our territory.	Neutral	Low	B3
17	Gaziantep	Nurdağı	Şatırhüyük	They disrupt the roads used by construction vehicles, and there are spills of material from trucks and construction machinery. Probably Fernas ' tools. We don't know where to complain. These roads are the between Sakçagözü and Şatırhüyük	Negative	High	C1
18	Gaziantep	Şehitkamil	Sam	Project work has no effect on our settlement.	Neutral	Low	B3
19	Gaziantep	Şehitkamil	Boyno	Project work has not yet reached us.	Neutral	Low	B3

4.5.3 Focus Group Discussions and In-Depth Interviews

A focus group discussion/interview is a group process structured to obtain detailed information about a particular subject matter. A focus group discussion consists of 7-12 participants to discuss a clearly defined topic. A focus group session lasts about 1-1.5 hours and its maximum period can be 2 hours. A specialist asks open-ended questions and ensures that discussions continue in an orderly manner. In this study, it was considered sufficient to organize a focus group meeting to represent each province, and 4 focus group meetings were realized (see Table 4.8).

To be held in open or closed areas at the national and international level scientific, cultural, artistic, and similar meetings or activities regarding the Presidential Circular (20.03.20 dated and 31074 numbered) according to the circular, online focus group interviews were conducted. In cases where the number of people required to hold a focus group meeting is insufficient, support was obtained from in-depth interview methods.

Table 4.8: General Results of Focus Group Interviews and In-Depth Interview

Province	Heading	Issue	Representatives / Members	Main Issue(s) of the Discussions /Interviews	Type of Interaction	Level of Interaction	Consequence Level
Mersin	Vulnerable groups	Disabled person	<ul style="list-style-type: none"> - Tarsus Branch of Turkish Disabled Association - Tarsus Branch of the Autism Association - Tarsus Visually Impaired Association 	<p>All activities should take into account the rights of disabled people.</p> <p>Disabled people should also benefit from the projects being carried out.</p> <p>Contact with disabled associations should be made.</p> <p>Before developing the project, a workshop should be held with the representatives of the association.</p>	Positive	Medium	A2
Adana	Vulnerable groups	Female	<ul style="list-style-type: none"> - Adana "Kadın Eli" Women's Development, Production and Business Cooperative 	<p>Definitely effects positively.</p> <p>Daily arrivals and departures on the Adana-Mersin route are very busy.</p> <p>Between Adana and Mersin, trains are preferred instead of buses and passenger cars.</p> <p>We want to spread our work in Adana to the region.</p> <p>We want to work with associations / cooperatives that carry out similar studies</p> <p>We are very keen to be stakeholders of the Project.</p>	Positive	High	A1
Osmaniye	NGOs / Professional Associations	Cooperation and solidarity	<ul style="list-style-type: none"> - Osmaniye Branch Office of Science Dissemination Society - Osmaniye Scientific Art And Culture Association (İLSANDER) - Osmaniye Branch Office of Anatolian Artisan Industrialists ' and Businessmen's Association (ANESİAD) - Osmaniye Branch Office of Beyazay Association of Turkey - Osmaniye Branch Office of Chamber of Agricultural Engineers 	<p>We have heard that there are problems with expropriation, especially in settlements in Bahçe District along the route.</p> <p>The fact that project work began longer than expected may have created problems. Local people, associations, craftsmen and people engaged in construction work do not have sufficient knowledge of the project. For example, it is very important to share information about the route.</p> <p>It is a station in Toprakkale, and the absence of a station in Osmaniye can be a disadvantage.</p>	Positive	Medium	A2
Gaziantep	Universities	Students	Graduate students of the department of sociology of Gaziantep University	<p>Since Gaziantep is a city that receives migration and develops, the development of transport contributes to this situation.</p> <p>The positive impact of the project increases or decreases depending on the route. For example, it must extend to the eastern region or merge with other major lines.</p> <p>Freight transport by train is common in Gaziantep, but there is no passenger transport.</p>	Positive	Medium	A2

4.6 Stakeholders

4.6.1 External Stakeholders

External Stakeholders of the Mersin-Gaziantep High Standard Train Project indicate an external stakeholder who is affected by or influences the activity. Public institutions and local people affected by the activity are also within this scope.

4.6.1.1 Local Communities

Local communities are directly affected at the facility in question. Accordingly, identified local communities around the facility are listed below.

Table 4.9: Local Communities Around the Project Area

Cities	Districts	Neighborhoods
Mersin	Akdeniz	Belonging to the Mersin
	Tarsus	Belonging to the Mersin
	Toroslar	Belonging to the Mersin
Adana	Seyhan	Belonging to the Adana
	Yüreğir	Belonging to the Adana
	Sarıçam	Belonging to the Adana
	Ceyhan	Belonging to the Adana
Osmaniye	Toprakkale	Belonging to the Osmaniye
	Center	Belonging to the Osmaniye
	Düziçi	Belonging to the Osmaniye
	Bahçe	Belonging to the Osmaniye
Gaziantep	Nurdağ	Belonging to the Gaziantep
	Pazarcık	Belonging to the Gaziantep
	Şehitkamil	Belonging to the Gaziantep

4.6.1.2 Public Institutions and Organizations

It is the public administrations that affect the operation process and working phases of the Mersin-Gaziantep High Standard Train Project. Public operations are of great importance to ensure the continuity of the Project. These stakeholders who are effective throughout the life of the Project; they operate at national, regional and local level.

Public Administrations at National Level

- Ministry of Transportation
- Ministry of Energy and Natural Resources
- Turkish Electricity Transmission Corporation
- Electricity Generation Company
- Ministry of Environmental and Urbanization

- Ministry of Industrial and Technology
- Ministry of Agriculture and Forestry
- Ministry of Treasury and Finance

Public Administrations at Province Level

- Mersin/Adana/Osmaniye/Gaziantep Governorship
- Mersin/Adana/Osmaniye/Gaziantep Governorship Provincial Planning and Coordinate Directorate
- Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Environmental and Urbanization
- Mersin/Adana/Osmaniye/Gaziantep Provincial Disaster and Emergency Directorate
- Mersin/Adana/Osmaniye/Gaziantep Forest Operation Directorate
- Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Agriculture and Forestry
- Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Industry and Technology
- Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Trade
- State Hydraulic Works 6th and 20th Regional Directorate
- 5th Regional Directorate of Highways
- Mersin/Adana/Osmaniye/Gaziantep Municipality
- Osmaniye Special Provincial Administration
- Çukurova Development Agency
- Eastern Mediterranean Development Agency
- İpekyolu Development Agency

Regional Official Bodies

- Akdeniz/Tarsus/Toroslar/Seyhan/Yüreğir/Sarıçam/Ceyhan/Toprakkale/Center/Düziçi/Bahçe/Nurdağ/Pazarcık District Governorship
- Police Department of Akdeniz/Tarsus/Toroslar-Mersin, Ceyhan/Yüreğir/Sarıçam/Ceyhan- Adana, Toprakkale/Center/Düziçi/Bahçe-Osmaniye, Nurdağ/Pazarcık-Gaziantep
- Military of Akdeniz/Tarsus/Toroslar/Seyhan/Yüreğir/Sarıçam/Ceyhan/Toprakkale/Center/Düziçi/Bahçe/Nurdağ/Pazarcık
- Mukhtars

4.6.1.3 Associations, Civil Society Organizations

Associations, Non-Governmental Organizations are institutions tend to be affected by activity and affect the activity. It is important to have a transparent relationship with these stakeholders. These stakeholders include district and provincial unions, local, local and national non-governmental organizations and village cooperatives. These stakeholders are listed below.

Non-Governmental Organizations at National Level

- Worldwide Fund for Nature (WWF)
- The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA)
- Institution of Nature
- Miners Association of Turkey
- Association of Historical Towns

- The Foundation for the Promotion and Protection of the Environment and Cultural Heritage (ÇEKÜL)
- Greenpeace

4.6.1.4 Academicals Institutions

- Mersin, Toros and Çağ Universities (Mersin)
- Çukurova, Kanuni University and Adana University of Science and Technology (Adana)
- Osmaniye Korkut Ata University Faculty of Science and Letters
- Gaziantep, Hasan Kalyoncu and Sanko Universities (Gaziantep)

Universities are an important resource for scientific studies and research. The continuity of the communication link with the universities during the operation process of the project is a very effective element in terms of information exchange. Face-to-face meetings will be held with the academicians at the university whenever there is a need for business-related opinion at the project.

4.6.2 Internal Stakeholders

Internal Stakeholders are the managers and staff of the Mersin-Gaziantep High-Standard Train Project and the Rönesans Holding to which it is affiliated, as well as the subcontractor subsidiaries, representatives and suppliers. Communication with internal stakeholders is important in relationships to be established with external stakeholders. The list of internal stakeholders identified is given below.

- Rönesans Holding Chairman of the Executive Board
- Rönesans Holding Members of the Board of Directors
- Rönesans Holding Executive Committee Member
- Rönesans Holding Mersin-Gaziantep Principal of the High Standard Train Project
- Mersin-Gaziantep High Standard Train Project Executives
- Mersin-Gaziantep High Standard Train Project Personnel
- Subcontractors
- Suppliers

4.7 Stakeholder Engagement Program

The stakeholder engagement plan should be updated periodically. In addition, it should be included in the studies/surveys that are likely to be carried out in a way to cover the Social Impact Assessment or Settlements that can be carried out within the scope of the Project.

4.7.1 Engagement of the Vulnerable Groups

Many national or international organizations require the support of individuals/communities who are particularly vulnerable to the negative impacts and risks of the facility.

In the region where the project is to be installed (Mersin-Gaziantep), a separate work program will be carried out to identify people who often do not have sufficient representation opportunities in public processes, including disabled people, women, people who do not speak Turkish, the elderly, etc.

4.8 Policy

Currently, Public Relations Policy, Environmental Policy and Quality Management System Policy are implemented for Mersin-Gaziantep High Standard Train Project and these policies will be continued for the project lifetime. In addition, the policies created within the scope of the project will be published on the official website of the project.

4.9 Management Human Resources

Within the scope of the High Standard Train Project Operation, the objective of the Human Resources Policy is that to increase the behavioral and professional knowledge and skills of employees with the offered development opportunities, to enrich them based on performance, to continuously increase their work efficiency and to provide career opportunities in order to provide quality services.

High Standard Train Project Personnel will fulfill its social security obligations in two groups: white-collar and blue-collar employees.

During the construction period, when infrastructure, superstructure and excavation operations are carried out, the maximum number of employees that will be employed for the project is 385 people, consist of white-collar and blue-collar employees.

4.10 Sharing Holding and Project Information

4.10.1 Contact Methods with Stakeholder

Ensuring effective stakeholder communication is an important work for the process of the project to proceed correctly. Various communication methods will be used to reach the information about this project to as many people as possible. These methods will be communicated to different stakeholders, depending on their willingness to participate.

In order to ensure regular communication with stakeholders who are positively or negatively affected by the Project, Public Relation of the Rönesans will be responsible for informing and recording the views and opinions of the currently active stakeholders (as detailed in the grievance mechanism) and communicating them to the necessary people. In this context, it is envisaged that the following communication methods will be used.

4.10.1.1 E-mail

Rönesans Holding's website operates under ("kurumsaliletisim@ronesans.com"). Public disclosures are made on the website in order to inform the public and all stakeholders. In addition, all contact information is available on the site.

Within the scope of the Stakeholder Engagement Plan, meeting announcements to be made on the official website of the Holding at certain periods, tools that will allow stakeholders to convey comments and opinions, and appropriate search engines / keywords for easy access to the public will be included in the site.

4.10.1.2 Posting

The full address for sending post, which is one of the communication methods with Rönesans Holding is given below.

Address: Atatürk Bulvarı No:144-146 Protokol Yolu Çankaya, Ankara 06640, Türkiye

4.10.1.3 Informative Meetings

Informative meetings will be held periodically with the stakeholders regarding the project activity. These meetings allow the exchange of ideas, requests, opinions and suggestions, as well as their concerns to be addressed and communicated to the appropriate authorities.

Before the meetings are held, information about meeting such as location, time and content is notified to all stakeholders by one or more of the communication methods.

The agenda of each meeting to be held should be arranged in such a way as to allow a maximum time to ask questions that come to mind, to clarify unclear issues and to raise any concerns.

4.11 Stakeholder Engagement Action Plan

Stakeholder Engagement Action Plan of the Project is given below (see Table 4.10).

Table 4.10: Stakeholder Engagement Action Plan

Work Number	Work to Be Carried Out	Purpose	Stakeholders	Time Period	Responsible Organization	Information Sharing Method	Reporting Result
1	Determining the compatibility of SEP between Rönesans Holding and credit institutions	Agreement of all parties about stakeholder engagement approach, methods to be used and timeframes	Rönesans Holding and Credit Institutions	-	Rönesans Holding	Agreement	Preparation of SEP
2	Organizing and holding public meetings	Sharing information about the Project	Local people affected by the activities in the Project	Regular period	Rönesans Holding and Consultants	The announcement of the meetings is given at the following locations; -Construction camp site Announcement; - A letter of participation to the village mukhtar - A letter of participation to the relevant governorships and district governorships - Meeting information on the website of Rönesans Holding	Preparation pf meeting report
3	Holding and holding meetings with stakeholders	Sharing information about the Project	All stakeholders	Regular period	Rönesans Holding	Announcement; Announcement on the website of Rönesans Holding	Preparation pf meeting report
4	Media / Social media	Informing stakeholders about the Project-related activities, meetings and progress in the Project process	All stakeholders	Regular period	Rönesans Holding	Web site Social media	Opinions and grievance
5	Email updates	Informing stakeholders about the Project-related activities, meetings and progress in the Project process	All stakeholders	Regular period	Rönesans Holding	Web site	Performing necessary controls
6	Website of Rönesans Holding	Informing stakeholders about the Project-related activities, meetings and progress in the Project process	All stakeholders	Regular period	Rönesans Holding	Web site	Performing necessary controls
7	Updating the SEP	Regularly and efficiently updating and presenting the SEP	Internal stakeholders/ External stakeholders	Every 6-month / Every 1-year	Rönesans Holding	Invitation letter E-mail	Keeping SEP up to date
8	Informing about the Project activities	Conducting project activities in agreement with stakeholders during the implementation process	All stakeholders	Every 6-month	Rönesans Holding	Website of Rönesans Holding	Preparation of informative report every 6-month
9	Taking necessary precautions with SEP: 1- Establishing an effective complaint mechanism 2- Keeping the tracking system and inspection mechanism up to date	Conducting project activities in agreement with stakeholders during the implementation process	All stakeholders	Regular period	Rönesans Holding	Website of Rönesans Holding	Regarding the resolution of grievance regular follow-up and inspection to do

5 GRIEVANCE MECHANISM

The purpose of the grievance mechanism is primarily to respond the complaints and requests of stakeholders. The grievance mechanism should be open, widespread and public. In addition, an effective grievance mechanism is a written resource for stakeholder management. Therefore, it is important to encourage stakeholders to submit their requests and complaints in writing.

Effectiveness of a grievance mechanism as a management procedure depends on the existence of the following key determinants:

- **Clearness and clarity:** Both visual and written sources used in public disclosure should be prepared with clearest form. For instance, addresses and phone numbers of the assigned person should be in visible form for also elderly and handicapped people.
- **Prevalence and accessibility:** All the visual and written material such as brochures, advertisements, posters should be delivered to all settlements in the PSIA.
- **Privacy and respecting to personal rights:** Throughout all the activities, the collected personal data should be protected in accordance with The Personal Data Protection Law No. 6698.

5.1.1 Flowchart

In order to respond to requests and complaints related to the project, the functioning of the grievance mechanism is illustrated in the following Figure 5.1 and Table 5.1.

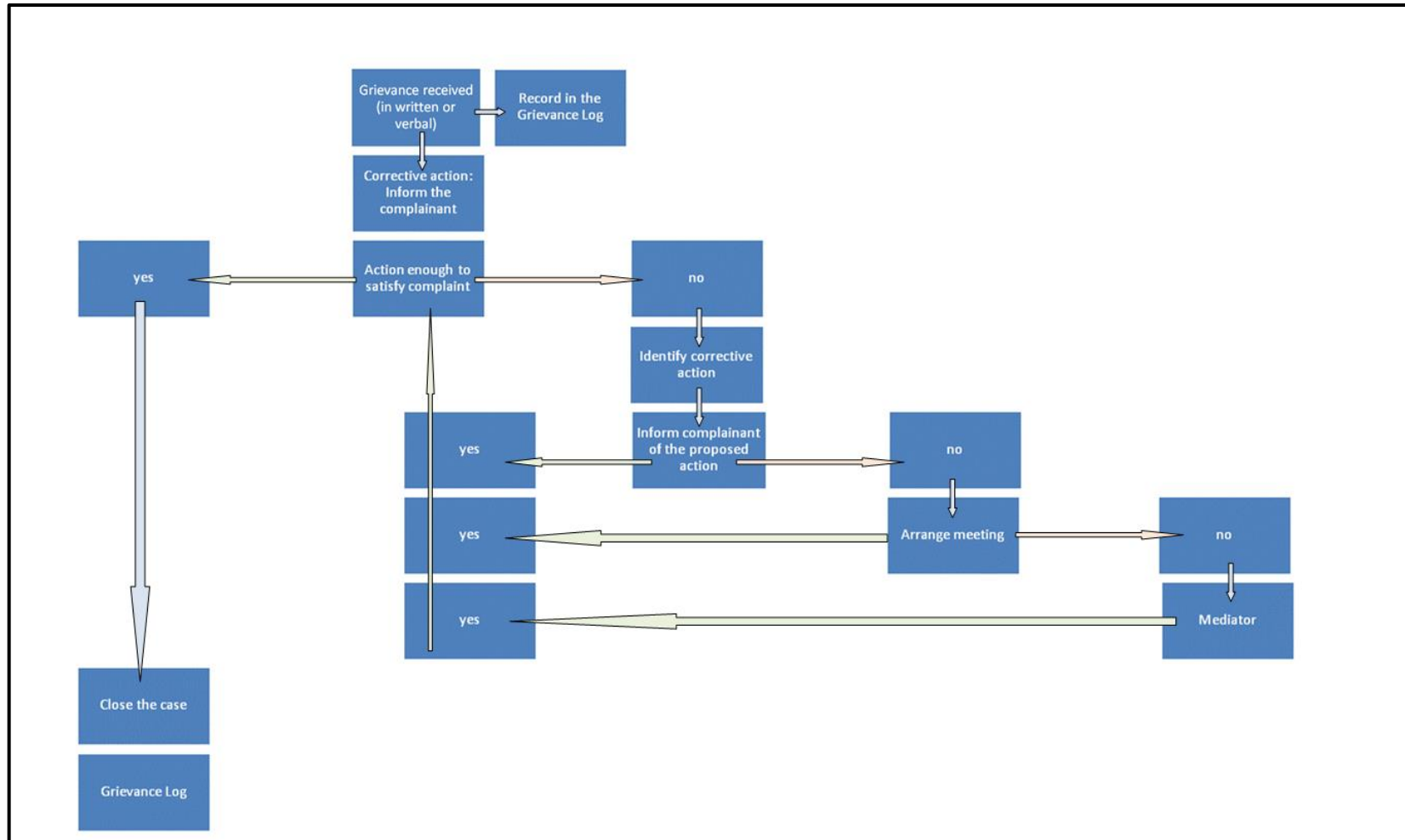


Figure 5.1: Grievance Mechanism Flowchart

Table 5.1: Steps on Flowchart

		STEP 1	STEP 2	STEP 3	STEP 4
		Receiving and Registration	Reviewing and Investigation	Response and Feedback	Monitoring and Evaluation
Actions of the Parties in the Step	Complainant	Completion and submission of a grievance form	Waiting for response till 30 days	Waiting for response till 30 days	Grievances are monitored to ensure they are properly handled within the deadline and principles.
	Respondent	Grievance is considered to be officially accepted	Check the validity and severity of the grievance	A formal response explaining how the grievance has been resolved will be provided to each complainant within 30 days.	
		Result of 1st Step	Result of 2nd Step	Result of 3rd Step	Result of 4th Step
Results		Grievance will be recorded in the in the “grievance log” within two (2) days of receipt of the complaint.	Grievance will be registered and acknowledged within five (5) working days and responded to the complainant within 30 days as of receiving the grievance	When solution is delayed, the complainant will be informed with regular updates on progress. If complainant may not agree with the solution of the problem, the grievance department or manager should arrange a meeting with complainant to reach a further agreement.	Monitoring and reporting process will be implanted after the corrective actions and consultations.

5.1.2 Grievance Form

The Client will have a communication tools such as public relation office, Project website. In addition to this, grievances can be filed through the interviews by face-to-face, on-line or telephone. Grievance forms will also be found in easily accessible places such as common usage areas in the settlements, public relation office and Project management office. The template of grievance form given in Figure 5.2

Grievance Form Registration Number:					
Registered Person:					
Settlement of Grievance:					
Registration Date:					
Subject:					
Information of complainant					Notification type
Name - Surname					☐ Telephone
Telephone No					☐ Contact Office
Address					☐ Site Visit
					☐ Mail
					☐ Other
Information on person receiving the complaint					
Name - Surname		Date		Signature	
Procedure for Corrective Action					
Information on Corrective Action of Complaint					
Relevant Person	Date of Action		Signature		
Is there any feedback provided to the complainant?			Yes ☐	No ☐	
Information on person providing feedback					
Name - Surname		Date		Signature	

ACTION PLAN FOR TERMINATION	
COMPLAINTS	
1	
2	
3	
4	
5	
REINSTATEMENTS	
1	
2	
3	
4	
5	
RESPONSIBLE DEPARTMENT	
SIGN OFF DATE	
TERMINATION OF COMPLAINT	
IS THERE ANY COMPENSATION MEASURES REQUIREMENT?	1) YES 2) NO
SIGNATURE	

Figure 5.2: Template for Grievance Form

6 DUTY, RESPONSIBILITY AND TRAINING

- Rönesans Holding is primarily responsible for the preparation and execution of the Stakeholder Engagement Plan. It should ensure that the plan in question is implemented and monitored until the Project is completed and operation period starts.
- Responsible of the Project management team, providing the necessary resources for the implementation of the SEP and monitoring the implementation of the plan, the management of the request / complaint mechanism, and the evaluation of the submitted feedback. In addition, the subject of the complaint should work with the relevant units to gather accurate information about the problem and ensure that the result reached is conveyed to the senior management and the solution produced to the complainant.
- Administrative and Social Affairs Unit and Human Resources Unit will play a leading role in communication with stakeholders.
- All employees of the facility and subcontractor employees must be informed about the facility and its activities by making announcements and meetings. In accordance with the determined training hours, information will be given periodically.

7 PLAN DEVELOPMENT, MONITORING, REPORTING AND RECORDS

This plan needs to be internally audited, reviewed and updated every 6 months in the construction period. In addition, external audits every 1 year during the construction period. During the review process, in any change made in the Stakeholder Engagement Plan, the reason for this change should be documented and presented and should be up to date.

While monitoring the plan, it will be evaluated whether the plan has achieved the goals and fulfills the requirements of the relevant approval conditions. Environmental monitoring records, mitigation actions and results of audits will be taken into account when conducting the review. Evaluation; document the results of the plan made and identify potential improvement areas.

Within the scope of monitoring and evaluation, attention will be paid to stakeholders affected who are especially vulnerable groups by project activities.

All activities (meetings, audits, updates and improvements, complaints, trainings, etc.) to be carried out within the scope of SEP will be recorded in the project (except those requiring confidentiality) and stored.