
MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

NON-TECHNICAL SUMMARY



NOVEMBER 2021

ANKARA



MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

NON-TECHNICAL SUMMARY

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Draft	A.0	November 2021	Tilbe Nazlı Environmental Engineer	Celal Denizli Biologist	Deniz Kozaklı Statistics	Leyla Demirçin Environmental Engineer	Esra Okumuşoğlu Geological Engineer	Günal Özenirler Environmental Engineer	D. Emre Kaya Environmental Engineer

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CLIENT



REC Uluslararası İnşaat Yatırım Sanayi ve
Ticaret A.Ş.
Portakal Çiçeği Sok. No. 33 Yukarı Ayrancı
ÇANKAYA / ANKARA
☎: +90 (312) 441 31 41
☎: +90 (312) 442 59 48

CONSULTANT:



Tepe Prime İş Ve Yaşam Merkezi
Mustafa Kemal Mahallesi Dumlupınar
Bulvarı No: 266 B Blok Kat: 2 Daire: 38
Çankaya - Ankara / Türkiye
☎: +90 (312) 295 62 48
☎: +90 (312) 295 62 00

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1 INTRODUCTION

Turkish Republic Ministry of Transport and Infrastructure, General Directorate of Infrastructure Investments (AYGM) intends to construct a new high standard railway line from Mersin to Gaziantep (herein referred to as ‘the Project’), in five different sections. Once operational the Project would be operated by TCDD and TCDD Transport.

Financing parties comprising of Industrial and Commercial Bank of China (ICBC), Internationale Nederlanden Groep (ING), Banque Nationale de Paris S.A. (BNP) Paribas, Deutsche Zentral-Genossenschaftsbank (DZ) and Export Credit Agencies (ECAs) UK Export Finance (UKEF) and Swedish Exportkreditnämnden (EKN) collectively called the ‘Lenders’, are considering financing components of the Project, specifically the railway between Mersin and Gaziantep. The Project and this Non- Technical Summary (NTS) have therefore been developed on behalf of AYGM in accordance with these Lenders policies and requirements.

2 PURPOSE OF THE NON-TECHNICAL SUMMARY

The purpose of the Non-Technical Summary (NTS) of the Environmental and Social Impact Assessment (ESIA) for the Mersin-Adana-Gaziantep (MAG) High Standard Railway Project is:

- to provide an easy-to-understand summary of the information which is provided in the Environment and Social Impact Assessment (ESIA) report; and
- to help the public and stakeholders to understand: the project need and background, project description, the ESIA process (including stakeholder engagement and grievance mechanism), the potential adverse and beneficial environmental and social effects of the Project as well as the mitigation measures that will be implemented to avoid or reduce adverse effects and enhance the benefits.

3 PROJECT SCOPE AND EXTEND

With the High Standard Train Project, it is aimed to shorten the travel time and increase passenger comfort by reducing Adana-Gaziantep travel time by 1.5 hours. In addition to shortening the travel time, it will be a great investment for Gaziantep with a population of approximately 2 million and Mersin with an international port. Other stations between Mersin-Gaziantep route and passing through certain provinces/districts will provide passenger comfort and economic benefits.

In 2023, it is aimed to increase the passenger capacity in railway transportation from 1.3% to 3.8% with the High Standard Train Project planned.

The main scope of the Project is high standard railway construction and rehabilitation between Mersin and Gaziantep Provinces of Turkey.

Turkey aims to improve intermodal and multimodal applications by using the geographic advantage of Turkey to;

- Increase the share of railway and seaway in transportation,
- Establish a fast, flexible, safe, reliable, and integrated transportation system and so reduce logistic costs and trade facilitation,
- Increase growing competitiveness for logistics and transportation within the scope of 11th Development Plan covering the period 2019-2023.

For this purpose;

- Ongoing high standard railways will be completed,
- Planning for high standard railway will be made by considering the balance of supply and demand,
- Express services will be increased, and
- Travel times will be shortened.

In this context, it is planned that the total length of high standard railway, which were 1,213 km in 2018, will be increased to 5,595 km, and the share of railway passenger transportation is increased in total (on land) from 1.3% to 3.8% in 2023.

The studies for the completion of Mersin-Adana-Osmaniye-Gaziantep High Standard Railway System have been started in accordance with 11th Development Plan, and the Project was awarded to Rönesans International Construction Investment Industry and Trade Inc. (REC).

The Train Project, which is the subject of this report and 286 km in length, starts from Mersin, passes through Adana, İncirlik, Toprakkale, Bahçe, Nurdağ, Başpınar Stations respectively

and ends at the Mustafa Yavuz Station. Following the completion of the railway, the travel time between Adana and Gaziantep will be reduced to 1.5 hours. As a result, while the transportation cost to Mersin where there exists an international port reduces, the competition opportunities of producers, especially located in Gaziantep will increase because, Gaziantep is an industrial city with a population of around 2 million.

4 ESTIMATED BENEFITS OF THE PROJECTS

Estimated benefits of the Projects are as follows:

- The travel time between Adana-Gaziantep will be shortened by 1.5 hours with the High Standard Train Project,
- It will increase the passenger comfort,
- It provides an important economic effect,
- Especially for Mersin, which is a port city, the port will contribute to the development of local and intercity transportation and the development of the economy,
- It is expected to provide employment in the cities where the stations and stops of the high standard train pass,
- With the shortening of the travel time and the increase in comfort, it is expected that the number of tourists coming to the region will increase and accordingly, the region around the project area will be improved economically.

5 PROJECT DETAILS AND KEY STAKEHOLDERS

A national Environmental Impact Assessment (EIA) study was carried out for the Project back in and the EIA Positive Decision was secured for a period of five years from 2011 to 2015 when construction works of separate sections of the Project route have been started to be awarded to different contractors. Table 5-1 shows the different sections of the entire MAG Project route with their corresponding construction contractors.

The Project is considered as “Category A” Project and to meet the environmental and social (E&S) requirements of the Lenders, Assystem Envy Enerji ve Çevre Yatırımları A.Ş. has been retained by REC to carry out an E&S Impact Assessment (ESIA) study for the construction and operation phases of the Project in line with the national environmental, health and safety (EHS) legislation including international conventions and treaties, and the related international standards such as IFC’s Performance Standards (PSs).

The ESIA Report was prepared based on the outcomes of the Gap Analysis and Scoping Study (finalized in April 2021) and built upon the existing technical Project documentation (reflecting the latest status of approved Project design) provided by the Contractor, information relevant to the Project in the publicly available resources, outcomes of the consultations conducted with the key stakeholders, findings of the baseline field surveys carried out by qualified specialists and assessment of potential Project impacts and/or risks in accordance with internationally accepted methodologies as part of the ESIA process. The ESIA Report assesses both the construction and operation phase E&S impacts.

The ESIA Report prepared by Assystem ENVY has been reviewed by Ramboll of UK as the IESC to identify the gaps in the scope of an Environmental and Social Due Diligence (ESDD) study done on behalf of lenders. Gaps including supplementary studies were issued in a Gap Analysis Report. 2U1K Mühendislik ve Danışmanlık A.Ş. (2U1K) has been awarded by REC to carry out supplementary studies in order to fulfill the gaps and prepare Supplementary Lender Information Package (SLIP) for the MAG High Standard Railway.

Table 5-1. Contractors Chart along the MAG Project Route

Section	Sub-section	Section Description	Section KM		Number of Lines			Length (km)			Scope of Work (per Contractor)						
			Start KM	End KM	Existing (Conventional-in Operation) to be Renovated			Open Route (km)	Tunnel (km)	Total (km)	Tunnelling (incl Superstructure)	Infrastructure	Superstructure	Electrification	Signalization	Telecommunication	Renovation of Existing Conventional Lines
Section 1	1a	Mersin-Adana	0+000	380+818	2	2	4	68	0	68	N/A	Nuhoglu (%80)	REC	REC	REC	REC	REC (1st Line + 2nd Line)
	1b	Çukurova CR			0	2	2	10	0	10	N/A	KGM	REC	REC	REC	REC	N/A
Section 2	2a	Adana-Ceyhan	380+818	447+000	1	1	2	49	0	49	N/A	REC	REC	REC	REC	REC	REC (1st Line)
	2b	Ceyhan-Toprakkale			1	1	2	30	0	30	N/A	Çelikler	Çelikler	REC	REC	REC	Çelikler (1st Line)
Section 3	(-)	Toprakkale-Bahçe	0+000	57+000	0(*)	2	2	49	8	57	Demce	REC	REC	REC	REC	REC	REC (*)
Section 4	(-)	Bahçe-Nurdağ	0+000	17+000	0	2	2	7	10	17	Intekar	Intekar	Intekar	REC	REC	REC	N/A
Section 5	5a	Nurdağ-T6	78+000	131+438	0	2	2	23	17	40	Fernas	Fernas	Fernas	REC	REC	REC	N/A
	5b	T6-Başpınar			0	2	2	14,75(*)	1,25	16	Fernas	REC	REC	REC	REC	REC	N/A
Gaziray		Başpınar-Gaziantep			0	2	2	0	25,5	25,5	N/A	Kolin-Kalyon-Gülermak					N/A

(*) Only the existing conventional railway line between Toprakkale and Tebci (18 km) will be renovated.

(*) As per the information received by the Contractor from the AYGM, the infrastructure works in Section 5b will potentially be constructed by Fernas as Fernas has started the tunnel construction in this section.

	Started But Not Completed (Suspended)
	Completed
	Ongoing
	Not Started

6 PROJECT COMPONENTS

The MAG Project is a 286 km high standard rail line between Mersin and Gaziantep. It starts from Mersin and passes through Adana, Toprakkale, Bahçe, Nurdağı through to Başpınar. There is a final section between Başpınar to the city center of Gaziantep that is being constructed by another contractor (under direct contract with Gaziantep Metropolitan Municipality).

The Project is split into five sections as follows:

- Section 1: Mersin to Adana – 76 km in length
- Section 2: Adana to Toprakkale – 79 km in length
- Section 3: Toprakkale to Bahçe – 58 km in length
- Section 4: Bahçe to Nurdağı – 17 km in length
- Section 5: Nurdağı to Başpınar – 56 km in length

Both passenger and freight trains will operate on the new railway. The location of the Project is shown in Figure 6-1.

The Project will consist of:

- New double track 286 km line (i.e., two new lines) between Mersin and Başpınar (Gaziantep) except the section between Ceyhan and Toprakkale (the last 16 km to Başpınar was included when contract has been awarded to REC but during the desing works prior to construction, it was also excluded from the scope of REC) (see Schematic Drawing for Sections of the Project, below);
- Modification of the existing infrastructure;
- New structures, such as bridges, viaducts, tunnels, overpasses and underpasses;
- Supporting power supply systems, inclusive of overhead lines and substations; and
- Supporting electrification (except the section between Bahçe and Nurdağı which is under another contractor's responsibility), signalization and control systems of the whole route from Mersin to Başpınar (Gaziantep).

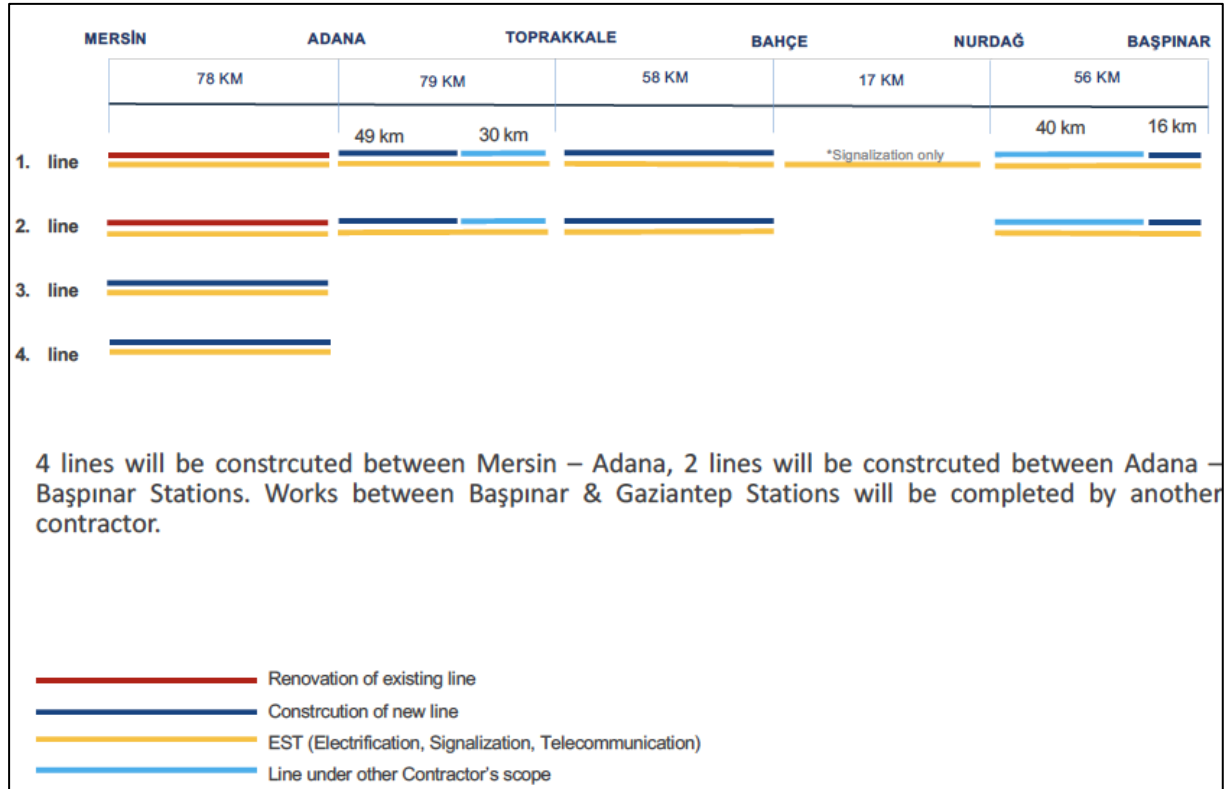


Figure 6-1. Responsibility Chart for Construction of the Project Route

Design Summary

Following table represent the summary of design for the entire route from Mersin to Gaziantep (including all Contractors together with REC).

Parameter		Specification/Number
Line Type		Electric
Design Speed (Maximum)	Passenger Trains	200 km/h
	Freight Trains	120 km/h
Structures	Bridges, Viaducts	25/10
	Culvert	190
	Tunnels (Cut and cover)	2
	Overpass	29
	Underpass	32
	Station	12
Railway Corridor		Between 12m and 15m (
Fencing		2.5m in height both sides of the rail track

An example cross section of the rail track is shown in Figure 6-4. The location of the structures is shown in Figure 6-2.

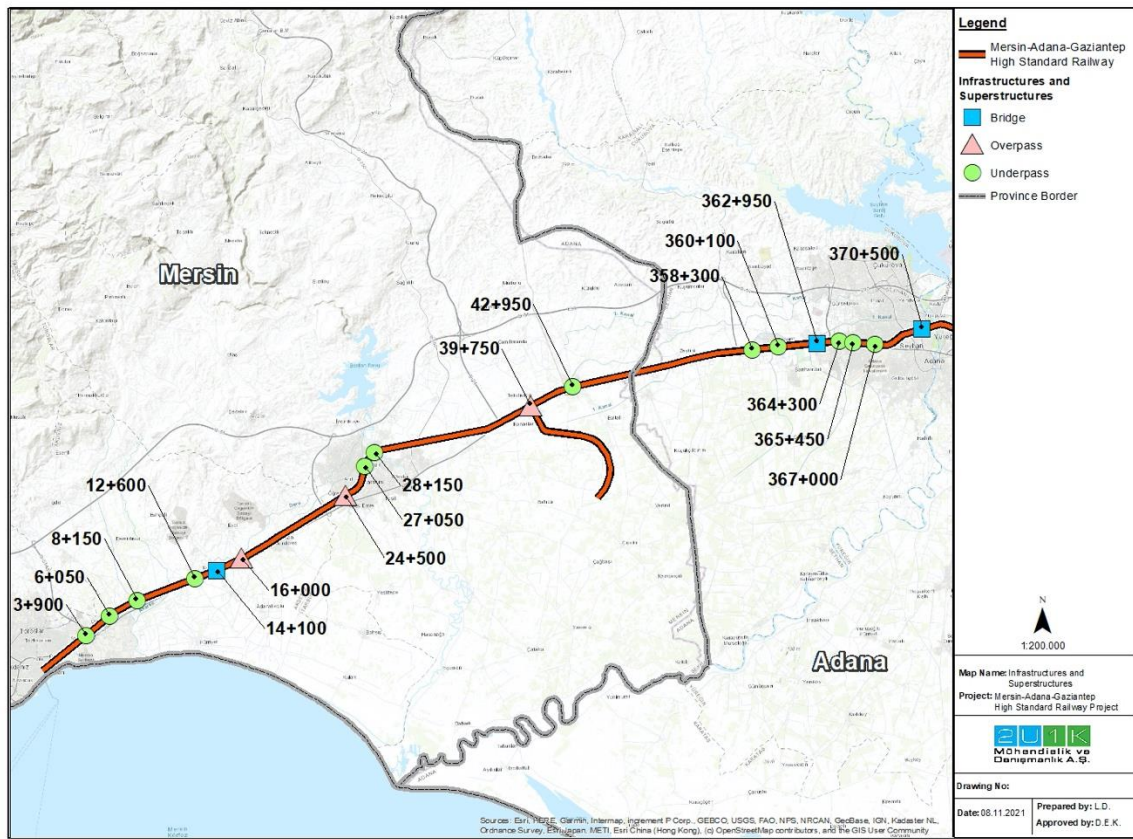


Figure 6-2. Infrastructure and Superstructure Map of the Project¹

¹ Since the detailed design was not completed for whole Railway Route, completed route section was presented and will be updated according to design changes.



Figure 6-3. Bridge (top left), tunnel and overhead lines (top right), overpass and signalization/electrification (bottom left), viaduct and underpass (bottom right)

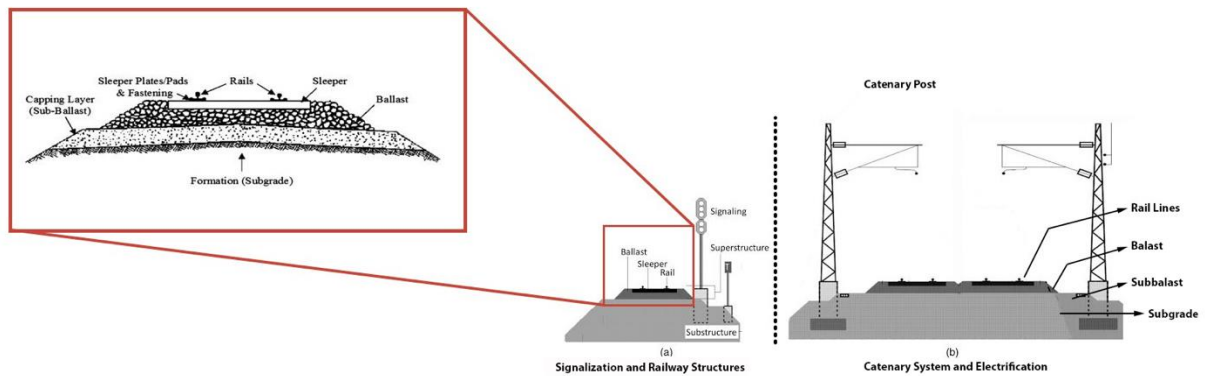


Figure 6-4. Example Cross Section of the Rail Track

7 PROJECT CONSTRUCTION AND OPERATION DETAILS

The Project is tendered in 2021 and the Project becoming operational in 2023. Throughout all construction activities the Contractor will comply with the Environmental and Social Management and Monitoring Plan (ESMMP) prepared in the scope of the ESIA studies and its Supplementary Lender Information Package (SLIP) works.

During the construction period of the MAG Project, site clearance, preparation, excavation, filling, and coating works will be carried out along the line. For the construction of the route, three (3) construction camps are going to be planned to be installed and the structures in these sites are planned to be prefabricated. They will provide worker accommodation, offices, healthcare facilities, sport facilities, parking, storage areas, fuel stores, waste segregation facilities and catering/canteen facilities. The Contractor will be responsible for negotiating agreements with landowners to temporarily use land for construction compounds. The selection of suitable locations will be in accordance with the environmental, social and economic criteria, national laws and Lender requirements that the Contractor is required to apply in the ESMMP

As a result of preliminary studies, central camp site is planned to be located in between Yenice and Tarsus whereas Ceyhan and Nurdağı are planned to be located as the second and third construction camp sites, respectively.

There is no quarry or dump site to be opened specific to the Project. All such existing facilities along the route in the region will be utilized for the Project development.

A total amount of 2,392,300 m³ excavation and 1,001,000 m³ filling is foreseen during the construction works of the Project. It is planned to recruit to 4348 workers in the 20th month of the total construction period (i.e., 34 month).

7.1 Construction Steps

In this Section of the NTS, it is aimed to present brief information on the preconstruction and construction works of railway Projects. Since the detailed design was not completed for whole Railway Route, all design change in next step of the Project, will be conducted by considering Design Change and Management Procedure.

7.1.1 Pre-construction activities

There are some preparative works before railway track construction. Among all the activities, subgrade drainage and materials preparation are common.

- The subgrade drainage is a system that is used to prevent the railway from water logging. The subgrade, roadbed and slope of railway track are very easy to be washed by water. If the subgrade drainage measures are not proper, this will lead to the subgrade diseases. It is necessary to install drainage before laying the track. Specifically, it mainly adopts drainage pipes, carrier drains and attenuation ponds in some area.

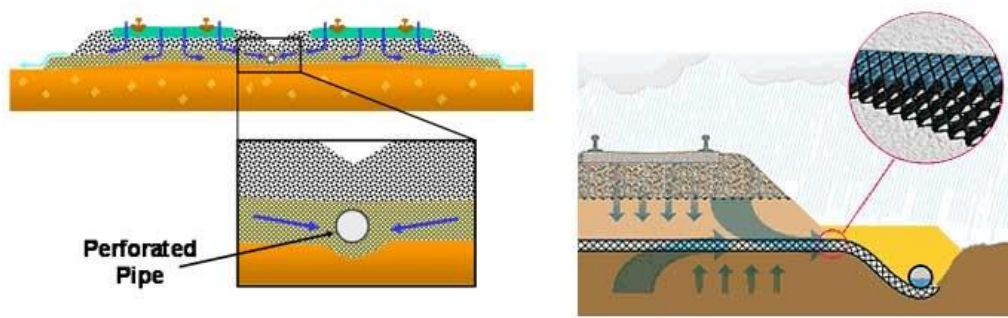


Figure 7-1. Track Drainage

Source: <http://www.railway-fasteners.com/news/how-to-build-a-railway-track.html>

- The preparation of construction materials is another work before track laying. Ordinary materials include railway sleepers, steel rail, rail fasteners and some construction equipment. Preparation works primarily refer to check the complement and integrity of all materials.

When all preparations are ready, next step is laying the bottom ballast.

7.1.2 Construction activities

The following paragraphs cover the main steps of railway construction²:

Logistics preparation

A logistic station is chosen as near as possible to the railway construction site. All the track material needed for railway construction is stored there. Concrete sleepers are strategically placed. These sleepers are later loaded onto the empty tie cars and the loaded cars are moved to the track construction machine for installation. On another occasion, rails are installed on the sleepers advanced here and later being laid on roadbed by machine.



Figure 7-2. Preassembled-sleepers-and-rails

Bottom ballasting

Theoretically, the rails should be laid on the pre-paved and tamped trackbed, but due to a large amount of ballast required per kilometer of the railway, the railway itself must be used for transportation to reduce freight and shorten the construction period. Therefore, other means of transportation are generally used first, and only a small number of ballast (or even just two layers of ballast under the rails) are laid. Trains are used to fill up the ballast as soon as possible after the tracks are laid.

The ballasting work includes many operations such as transportation, unloading, spreading, lifting track, lining the track, tamping, and ballast bed shaping. Among them, the transportation and unloading of ballast are mostly carried out by special automatic ballast unloading vehicles. For other operations, most countries use ballast machines with comprehensive work performance.

² <https://railroadrails.com/information/railway-track-construction-process/>



Figure 7-3. Bottom-ballast Layed.

Sleepers and tracks Laying

Normally, sleepers are laid first and railway tracks are laid next. However, they can be laid together at one time if the rails and sleepers are combined previously. One typical track construction machine is composed of a caterpillar, the main control operation, a self-propelled gantry. It can lay new sleepers, thread new rail, clip the rail to the ties.

The new rail which was previously positioned along sides of the way that threaded to the rail guides located at the front of the unit. The main control operation monitors the conveyor systems and the sidewalk mechanism. The self-propelled gantry keeps ties supplied to conveyor systems. The gantry moves to the tie receiving conveyor deposits ties and returns to the tie supply car for another load. After being deposited by the gantry, the ties move by a conveyor system through the ties drop area. The ties are discharged from the tie placement mechanism and are precisely spaced on the roadbed. After the rail passes through the rail guides it is guided into a gauging station. The final placing of the rail to the ties is controlled by an operator who guides the rail onto tie seat. The clipping is carried out by nipper clipper mechanism near the rear of the machine.

Another way of railway track installation is laying rails pre-assembled with sleepers. Sections of rails and sleepers are placing together in advance at the logistic area. Then it is loaded on a special flat car with wheels which is transported to the track laying machine. This machine has simple structure with a jib crane which lifts the assembled rails down to the ballast. After one section is finished, another lift begins to connect the two parts of rails.



Figure 7-4. Laying Sleepers and Tracks

Things need to notice:

In the process of laying railway tracks, the front of new rail just laid should be padded with some ballast properly to prevent being lowered by the front wheels of the track laying machine which may cause difficulties in the following process of a rail connection. Also, pay attention to the situation of roadbed, especially in areas with soft roadbed or poor geological conditions, reinforcement work should be done in advance. Once there are settlements or cracks, measures should be taken immediately to quickly retreat the track-laying train to ensure safety.

Top ballasting



Figure 7-5. Top-ballasting

As we mentioned before, only the bottom ballast has been laid. The top ballast is needed to form a solid foundation. The procedure mainly comprises the following steps:

- ballast unloading,
- ballast spreading,
- track lifting,
- track lining, and
- tamping with a tamper machine.

After the ballast is fully loaded and pressed down by trains for several times, the final repair will be done.

7.2 Operation Steps

MAG High Standard Railway Project would be operated by TCDD and TCDD Transport. As an operator, TCDD/TCDD Transport has the following Environmental & Social responsibilities:

- To ensure the necessary coordination between other subcontractors within the scope of cumulative impact assessment in order to complete the relevant assessments (flora, fauna, archaeological, social impact, etc.) within the scope of MAG Project Environmental and Social requirements.
- To ensure compliance of other subcontractors working in the relevant parts of our project (These projects are not subject to international credit) with the environmental and social requirements within the scope of Turkish legislation.

ESIA and the supplementary studies outputs are shared with REC's design team. An evaluation has been conducted on whether the design is sufficient for the management of the perceived risk. The impacts of climate change on the Project, such as flood risk, were shared with the design team and the extent to which the design covers such risks was discussed. Turkey has not fulfilled the legislative changes related to climate change risks in such infrastructure projects yet. However, considering the possible changes that may occur in the national legislation, the current legislation requirements have been discussed and all evaluations were reflected in the Project design.

There will be 12 stations on the Project route which will be constructed by another contractor under a different contract. Supplying access to the stations for the community is an important subject. For most of the stations, existing roads will be rehabilitated and used. For the new stations, there will be connection roads close to the existing highways.

The water requirement for the operation phase will depend on the use of personnel and drinking water. For the operating period, drinking water of the personnel at the route stations will be supplied from the market and the domestic water from the city network.

Along the Project route, there will be no level crossings and the Project route will be separated by wire fence and wall. In addition, automation systems will be installed along with signalling and electrification systems. Therefore, collision risks will be minimized.

According to output of ESIA and supplementary studies, some structures have been integrated to the Project design to minimize the environmental and social impacts of the Project. These include the followings:

- Noise Barriers,
- Rail Pads,
- Bird anti-collision Fence, and
- Culverts.

Examples of these structures are presented in **Figure 7-6** below.



Figure 7-6. Examples of structures

8 PROJECT STANDARDS

An ESIA has been undertaken to identify environmental and social impacts throughout the Project's lifecycle. The ESIA presents the findings of the assessment for environmental and social topics, identifying the potential for significant effects and suitable mitigation measures.

The Project has been structured to comply with all applicable national legislation, transport strategies and Lenders Environmental and Social requirements. The ESIA has been prepared to comply with the IFC Environmental and Social Performance Standards (IFC PSs) and Equator Principles (EPs).

This ESIA also conforms to:

- Turkish Environmental and Social regulatory standards;
- International environmental and social conventions and protocols ratified by Turkey, and;
- International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012);
- World Bank Group Environmental, Health and Safety (EHS) Guidelines in force at the time of this agreement, as applicable to the Project, including:
 - General EHS General Guidelines (2007);
 - EHS Guidelines for Railways (2007);
 - EHS Guidelines for Construction Materials Extraction (2007);
- Equator Principles 4 (EP4) (2020); and
- Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence, as adopted by the Organization for Economic Co-operation and Development ('OECD Common Approaches') (2016)

A national Environmental Impact Assessment (EIA) study was carried out for the Project back in and the EIA Positive Decision was secured for a period of five years from 2011 to 2015. The Project design has evolved since 2015, and this NTS is based on the revised design.

9 ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORIN PLAN (ESMMP)

An ESMMP has been prepared for the Project to:

- i. Set out the key environmental and social risks, impacts and sensitivities related to the Project (as identified throughout the ESIA);
- ii. Ensure that the Project will comply with the relevant standards, as set out in Chapter 4 of the
- iii. ESIA;
- iv. Describe the mitigation measures and management procedures (as identified throughout the
- v. ESIA);
- vi. Set out how the effectiveness of the mitigation measures and management procedures will be monitored;
- vii. Identify roles and responsibilities for the mitigation measures and management procedures;
- viii. Facilitate a continual review of Project activities based on performance data and consultation feedback; and
- ix. Implement corrective actions or adaptive management procedures, as required.

It represents a commitment by AYGM (design and construction) and TCDD&TCDD Transport (operation and maintenance) to environmental and social sustainability, and this commitment will also apply their contractors and sub-contractors and supply chain.

The Contractor will be required to develop the ESMP into the Construction Environmental and Social Management Plan (CESMP) prior to the start of construction. TCDD Transport and TCDD will be required to develop the ESMP into the Operation Environmental and Social Management Plan (OESMP) prior to the start of operation

Both the CESMP and the OESMP will contain several sub-plans as shown in Table 9-1

Table 9-1. Sub Plans Used for Construction and Operation

CESMP	OESMP
<ul style="list-style-type: none"> • HSE Plan • Procedure for Control of Life Critical Activities • Camp Management Plan • Quarry Management Plan • Community Health, Safety and Security Plan • Soil Management Plan • HSE Leadership and Key Performance Indicators Procedure • HSE Training Procedure • HSE Incentives Procedure • Work Permit Procedure • Change Management Procedure • Subcontractor Management Procedure • Control of Dangerous Energy Procedure • Subcontractor HSE Assessment Procedure • Orderliness Procedure • Color Coding Procedure • Purchasing and Supplier Evaluation Procedure • Air Quality and Emission Control Procedure • Noise and Vibration Management Procedure • Labour Management Procedure • Waste Management Plan • Medical Waste Management Plan • Hazard and Risk Management Procedure • HSE Discipline Procedure • Construction Machine and Equipment Procedure • Working at Height Procedure • Scaffold Safety Procedure • Traffic Management Procedure (including Construction Travel Plan) • Excavation Works Procedure • Personal Protective Equipment Procedure • Electrical Safety Procedure • Working With Dangerous Chemicals Procedure • Fire Safety Procedure • Surface Water and Wastewater Management Plan • Storage and Stacking Procedure • Emergency Response Framework • Accident and Incident Management Procedure • HSE Monitoring Verification and Evaluation Procedure • Cultural Heritage Management Plan 	<ul style="list-style-type: none"> • Operational Emergency Response Plan (based on the Emergency Response Framework) • Landscape Management Plan; • Operational Soil Management Plan; • Waste Management Plan; • Operational Maintenance Plan; • Tunnel Operational Management Plan; • Employment Plan; • Labour Management Plan; • Supply Chain Management Plan; • Community Health, Safety and Security Plan; • Health, Safety and Security Plan; and • Rail System Plan.

<ul style="list-style-type: none">• Biodiversity Management Plan• Community and Employee Grievance Procedure• Personnel Selection and Employment Procedure• Chance Find Procedure• Landscaping Management Plan• Rail Safety Plan	
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10 STAKEHOLDER ENGAGEMENT

A series of consultation meetings and surveys were undertaken during preparation of the National ESIA for the Project and further meetings and surveys were undertaken during the preparation of the ESIA in 2021. The consultation activities included:

- Meetings with district governorships, associations and NGOs, Public Institutions / Public Services Providers, Chambers, Unions and Development Agencies, Local media, municipalities.
- Meetings with Mukhtars in Çakaldere, Kuzucak, Toktamiş, Küçükburhaniye, Çokçapınar, Sayranlı, Nohut, Burgaçlı, Camiçi, Akçakoyunlu, Bostanlar, Yazlamazlı, Karataş, Kışla, Aslanlı, Sakçagözü, Satırhüyük, Sam, Boyno
- Focus group consultations, including Adana "Kadın Eli" Women's Development, Production and Business Cooperative, Mersin Tarsus Branch of Turkish Disabled Association, Tarsus Branch of the Autism Association, Tarsus Visually Impaired Association, 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, Gaziantep Graduate students of the department of sociology of Gaziantep University and Household surveys as part of the Resettlement Action Plan (RAP).

The key issues and concerns raised during the stakeholder engagement were as follows:

- Lack of Project information available to potentially affected persons.
- Lack of consultations with potentially affected persons.
- Lack of information about the project and expropriation process.
- Concern about closure of pedestrian crossings
- Concern about the expropriation process and payments
- Concerns around construction-related noise, emissions and overseas workers.
- Concerns around the potential effects on health, safety and security of women and harassment mainly during construction.
- Concerns around the potential effects on local lands and livelihoods.
- Concerns around the lack of access rights to agricultural land and village roads.
- Concerns around disruption to roads and access.
- Community safety around the rail.
- Train noise during operation.

Major concerns around the land acquisition process were in relation to the following: details about expropriation price; worries about loss of land; and restricted access and passing points for agricultural machinery, cattle and charcoal activities.

These issues and concerns have been considered throughout the ESIA, and mitigations described in later sections of this NTS. A Stakeholder Engagement Plan (SEP) has been developed, and it sets out the further stakeholder engagement will be undertaken throughout the design, construction and operation of the Project.

This NTS and the following disclosure documents will be disclosed for a period of 30 days, at the locations listed in this NTS. This will be done using the approach in the SEP, which is in accordance with Lender requirements:

- SLIP Package 1 including ESIA and E&S Governance Document,
- SLIP Package 2 including;
 - Supplementary Social Impact Assessment (SIA) Report,
 - Human Rights Impact Assessment (HRIA),
 - Updated Stakeholder Engagement Plan (SEP),
 - Cultural Heritage Impact Assessment Report including Cultural Heritage Management Plan and Chance Find Procedure,
 - Supplementary Terrestrial Ecology Survey Report (including flora, fauna and avifauna),
 - Supplementary Aquatic Biodiversity Survey Report,
 - Biodiversity Management Plan,
 - Critical Habitat Assessment,
 - Route Evaluation Table (including constraints),
 - Noise Measurements, Modeling and Assessment Report,
 - Air Quality Modeling and Assessment Report,
 - Climate Change Risk Assessment,
 - Flood Risk Assessment,
 - Updated/prepared new ESMMP including impacts, mitigations and monitoring as well as organizational structure,
 - Updated Non-Technical Summary (NTS),
 - ESAP (*to be confirmed and provided by Ramboll*).
- Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP);
- Contractor Management Plan (CMP);
- Emergency Response Framework (ERF) and
- Railway Safety Plan (RSP)

Following completion of the disclosure period, feedback gained throughout will inform the continued development of the Project. If applicable the disclosure documentation [such as the ESIA (including the ESMP) and the SEP] will be updated to capture the feedback gained throughout the disclosure period.

11 POTENTIAL IMPACT OF THE PROJECT

11.1 Water

Baseline studies were conducted in the scope of previous ESIA work regarding water quality state and groundwater table levels under and around the Project. The monitoring will be continued over these points to check the construction and operation phase impacts of the Project over the surrounding environment. These impacts management and their monitoring are explained below separately for construction and operation phases.

11.1.1 Construction Impacts and Monitoring

One possible major impact over water bodies will be potential spills/leaks. Various plans will be constructed and put in place including Surface Water Management Plan, Waste Management Plan, Materials Management Plan, and Emergency Response Plan. There are many measures to prevent any spill from happening, these include;

- Restricting or avoiding refueling near water bodies, also using impervious surfaces
- Refueling at least in 50 meters distance from any channels, drainage or watercourses to any waterbody.
- Hazardous wastes will not be stored in excavated areas, and
- Scheduling of construction activities near waterbodies in case of heavy rainfall.

The effectiveness of these measures will be controlled with visual inspection and observation, checking incident/accident reports and site inspection reports, as well as water quality measurements. The impacts of river water quality will also be monitored with these information. There will be other impacts coming from works near rivers and other water bodies, requiring the same mitigation measures and additional ones such as fence protection of the sites to prevent material loss and sediment pollution, obtaining required permits from State Hydraulic Works especially for construction on riverbed. Monitoring of these operations will be done via complain records and warnings/penalties given by public authorities. Another major impact/risk is related to the flooding. Flood defense systems and flood resilience systems will be constructed, and in case they became insufficient to control the flood, trained personnel will manage the state and elaborately record the actions and consequences. For wastewater generation, already present infrastructure will be used via connecting the wastewater effluents to the municipal wastewater network. Quality of the wastewater effluent will be checked along with public authority warnings/penalties and complaints to monitor the management. Separate measures will be taken to minimize/manage/monitor leakage to groundwater and excess drawdown, with groundwater quality measurements/ level measurements and other ancillary data.

11.1.2 Operational Impacts and Mitigation

Even though lesser than the construction phase impacts, there may be impacts of the Project over water in the operational phase. Operational Maintenance Plan and Emergency Response Plan will guide the proper avoidance, minimization and management of the spills/leaks to the water environments and their effectiveness will be controlled by water quality measurements on baseline measurement points and additional significant locations, and visual inspections of the storm water collection channels. The generated wastewater will be connected to the wastewater collection system and its integrity will be checked to ensure environmentally sound disposal of wastewater. There will also be flood risk during operational phase which might damage the infrastructure. The main action will be the constant monitoring of the weather and weather predictions and appropriate management of the flood instances, with train speed regulations when necessary. This will be monitored via grievance and incident records.

11.2 Air Quality

A monitoring study performed in order to understand the existing air quality of the Project area in 2021. During monitoring, it was found that dry, dusty areas of ground, in the absence of rain, resulted in increased background particulate matter concentrations.

11.2.1 Construction Impacts and Monitoring

Construction activities (including demolition, earthworks, construction and trackout) have the potential to generate and/or re-suspend dust, PM10 and PM2.5. Additionally, emissions from construction vehicles and plant have the potential to result in adverse effects on local air quality, particularly near where construction vehicles will be entering the Site.

The construction activities are likely to temporarily increase PM10 and PM2.5 concentrations, and the dust that will be generated during construction, is likely to lead to dust soiling. Following the application of mitigation within the ESMP, the effects of dust, PM10 and PM2.5 emissions during construction will be reduced and will not be significant. The mitigation measures include good construction practice measures, monitoring and remedial actions.

11.2.2 Operational Impacts and Mitigation

The Project will result in a reduction in local air quality emissions along the road network and a reduction in overall regional emissions of nitrogen oxides, PM10 and PM2.5, due to the shift from road-based transport to rail. There will be a small increase in human exposure to PM10 and PM2.5 emissions arising from brake and rail wear during the operation of the Project, although this will represent a very small portion of overall emissions. Overall, as the trains will be electric, it is unlikely that the Project would give rise to any significant operational air quality effects.

11.3 Noise and Vibration

A baseline noise survey (see an example was undertaken in 2021 to determine the existing noise levels in residential areas near the Project. The noise climate in surveyed locations was observed to be typical of a rural nature, with agricultural noise and occasional road traffic noise. Noise levels in residential areas towards the east of the Project were affected by existing railway as well as constant road traffic noise. The survey results indicate that the existing baseline noise climate generally exceeds World Bank Group guidelines values. This is due to existing road traffic noise and train pass by events on the existing railway, as well as agricultural activity.

11.3.1 Construction Impacts and Mitigation

Noise

Construction activities have the potential to give rise to significant adverse noise effects for most community areas within 300m of the Project. The community areas of Akdeniz, Tarsus, Seyhan, Ceyhan, and Hasanbeyli are likely to be worst affected by noise during construction.

As required in the ESMMP, the construction contractor will implement good practice measures to minimise the noise and vibration effects on the surrounding environment, including, but are not limited to, the use of site hoardings, non-vibratory construction equipment and limiting night-time working.

The Project will be constructed in sections, therefore, noise generating activities will only affect local communities for a small proportion of the overall construction programme. Local communities will also be given advance notification of noise generating activities.

Vibration

The construction activities that are most likely to result in significant vibration effects are:

- Surface compaction undertaken with vibratory rollers; and
- Piling activities undertaken during the construction of any structures.

The Project has the potential to result in a significant effect (disturbance) due to levels of vibration being experienced at properties along the Project during construction. A noise and vibration monitoring programme will be undertaken at sensitive receptor locations, as set out in the ESMP. Vibration will be reduced through measures such as, the selection of low or non-vibratory piling equipment, and no start-up or shut down of vibratory plant within 50m of residential properties.

11.3.2 Operational Impacts and Mitigation

Noise

During the operation of the Project, properties in Akdeniz, Tarsus, Seyhan, Ceyhan, Toprakkale, and Hasanbeyli have the potential to experience a significant adverse effect. However, with mitigation measures in place, including noise barriers, cuttings and improved glazing for residential properties, the residual effect will not be significant

Vibration

Some properties within 25m of the Project in Tarsus, Seyhan, and Toprakkale are likely to experience a significant effect due to freight movements at night. However, with mitigation measures in place, including such as vibration reducing rail pads, the residual effect will not be significant. Other residential receptors along the Project are not anticipated to experience significant vibration effects.

11.4 Resource Use and Waste

This section summarizes how the Project will manage its impacts on the environment from its waste generation, management, and disposal, and resource use in separate chapters for construction and operation phase.

11.4.1 Construction Impacts and Monitoring

Waste

In order to minimize and manage the impacts of the Project in the construction phase in terms of waste, Waste Management Plan, Materials Management Plan, and also Emergency Response Plan will be developed. To monitor how effective these plans are, visual inspections will be done regularly, and waste disposal records and records of the contractual agreements for waste management will be checked.

Another impact will result from quarries, including increased PM10 emission to its vicinity, land degradation, vibration, air-water-noise pollution. Although REC will not open any new one, the existing ones permits, and operations will be controlled to ensure that they are in line with national and international standards. Visual inspections will be done to monitor them.

The impact from the disposal of excavated soil will also be managed to prevent sediment pollution to rivers and dust dispersal to the air. Through Waste Management Plan and Spoil Management Plan, various measures, outlined in its respective chapter in Construction Phase ESMMP, will be taken to ensure its control. Visual inspections and third-party agreements/contracts records for excavated soil disposal will be checked to monitor the effectiveness of the relevant active plans.

Throughout the construction phase, it is possible that hazardous wastes will be generated, and they can potentially contaminate soil, water, and air and harm the ecosystem around them. In addition to the regular controls in solid waste management, for hazardous waste it will be separately recorded whether the waste is generated directly, or by contaminating previously non-hazardous waste. These records will be checked to see the effectiveness of the plans.

The last topic relevant to the waste is the management of its disposal. Waste segregation mechanism will be established, which will ensure that the waste that might be recycled will not be contaminated by non-recyclable waste and alter its disposal options. Possible recovery, reuse, recycle operations will be considered. If all fails, its proper disposal will be ensured. For organic waste, composting pre-treatment will be considered before disposal. For hazardous waste, as well as in other wastes, GIIPs and limitations on its transboundary movement will be complied. On-site disposal of waste oils and solvents will be avoided. For monitoring the effectiveness of the plans and management on waste disposal, their monitoring reports will be inspected, and the ratio of reused/recycled and landfilled waste will be calculated.

Resource

A Materials Management Plan will be constructed to manage materials and their impacts throughout the Project. Main identified impact subjects are excessive water use which might reduce the available water for other purposes, pollutant release to the receiving bodies that can reduce the quality of the water and their usage options, and possible fugitive emissions from material stockpiles such as additional dust and PM with wind, rain erosion or sediment contribution to flowing water bodies. Relevant mitigation scenarios were recommended in the respective part of the ESMMP for this subject. To monitor its application the related reports will be inspected.

11.4.2 Operational Impacts and Mitigation

Waste

Waste will be generated in the operational phase, as well. Hence, its proper management and disposal should be planned and conducted with a Waste Management Plan for operational phase. Various mitigation scenarios and trainings should be planned to ensure the Project's compliance with national Waste Management Regulation (Official Gazette, no. 29314, date: 02.04.2015) and other relevant legislation, as well as IFC General EHS guidelines. To monitor the effectiveness of these measures, visual inspections will be done, and waste audits will be conducted including the examinations of disposal records.

Resource

Comparing to the construction phase resource use, or construction and operational phase waste management, there will not be a major impact from the operational phase resource use to the surrounding and/or other environments.

11.5 Geology, Soil and Landuse

The Project area is in the Taurus belt, between the Yumurtalık Fault and the Amanos Mountains. The railway route is examined in two parts, the center of which is north and south. Post Miocene erosions, rock falls, rock falls that occur in rock variations on the slopes and the post Miocene erosional surfaces that have become smaller due to erosion in the northern part due to erosion, badlands topography around the dam lake is formed by abrasion and accumulation glaciers, ridges, and steep slopes. They are split by streams. In the southern part, the alluvium formed by delta sediments and the large flood area formed by the change of bedding of the Seyhan River in time consists of detached meanders, lagoons, lakes, cape set reservoirs, crevasse and river terraces.

After the construction works, the soil structure will change, and the vegetative soil will be re-laid in the Project area and the soil will be tightened. Because of these processes, the Project is not expected to have a negative impact on soil erosion risk classes.

11.5.1 Construction Effects and Mitigation

During construction, topsoil losses, soil disturbance and soil contamination are the possible impacts of the Project on soil. The excavated soil will be stored permanently storage areas near to the project area until the end of construction period and saving the vegetative properties of excavated soil will be ensured. Soil contamination may be caused by accidentally release of hazardous materials like oil used by machines.

The Contractor will implement relevant sections of the ESMMP, including measures to reduce pollution and contamination, manage materials and waste, health and safety, and emergencies, including spills. This will ensure a safe environment for construction workers, and local communities.

Works carried out during the construction period such as clearing the area, earthworks and excavation of the soil can make the soil risky to the erosion. Revegetation requirements to minimise erosion will be included in the ESMMP and in the Landscape Management Plan. These will include measures to reinstate and restore lost fertile topsoil on agricultural land. With the implementation of those mitigation measures no significant effects are anticipated.

11.5.2 Operational Effects and Mitigation

The ESMMP includes measures to stabilize cuttings and embankments and areas at risk of landslide along the Project.

The ERF will be elaborated to prepare an operational Emergency Response Plan prior to operation, which will cover seismic activity, natural disaster response as well as pollution

prevention procedures. With the implementation of the above mitigation measures no significant effects are anticipated.

11.6 Ecology

Important ecological receptors associated with the Project are

Important ecological receptors associated with the Project consist of endemic / restricted range and endangered species of flora and fauna and key biodiversity areas. Details of these are listed below.

Key Biodiversity areas:

- Mersin Hills KBA
- Yılankale Hills KBA
- Yeşilce KBA (Important Bird Area)
- Amanos Mountains KBA (Important Bird Area)

Endemic / Restricted Range Terrestrial Flora Species:

- 39 Plant species

Threatened Terrestrial and Aquatic Fauna Species:

- 3 Invertebrates
- 14 Fishes
- 1 Reptiles
- 8 Birds
- 5 Mammals

Endemic / Restricted Range Terrestrial and Aquatic Fauna Species:

- 2 Invertebrates
- 14 Fishes
- 2 Reptiles

11.6.1 Construction Impacts and Mitigation

Construction effects will comprise the followings:

- Damage or loss of terrestrial habitats.
- Habitat fragmentation.
- Loss of sensitive plant species.
- Loss of sensitive fauna species.

- Increase in noise, visual and vibration which may cause disturbance or displacement of fauna.
- Introduction of Alien invasive species.
- Damage to Freshwater Ecosystem.

Legally Protected Areas and Internationally Recognized Areas

The Project crosses 4 Key Biodiversity Areas (Two of them are Important Bird and (IBAs) as shown in Figure 11-1 Key Biodiversity Areas.

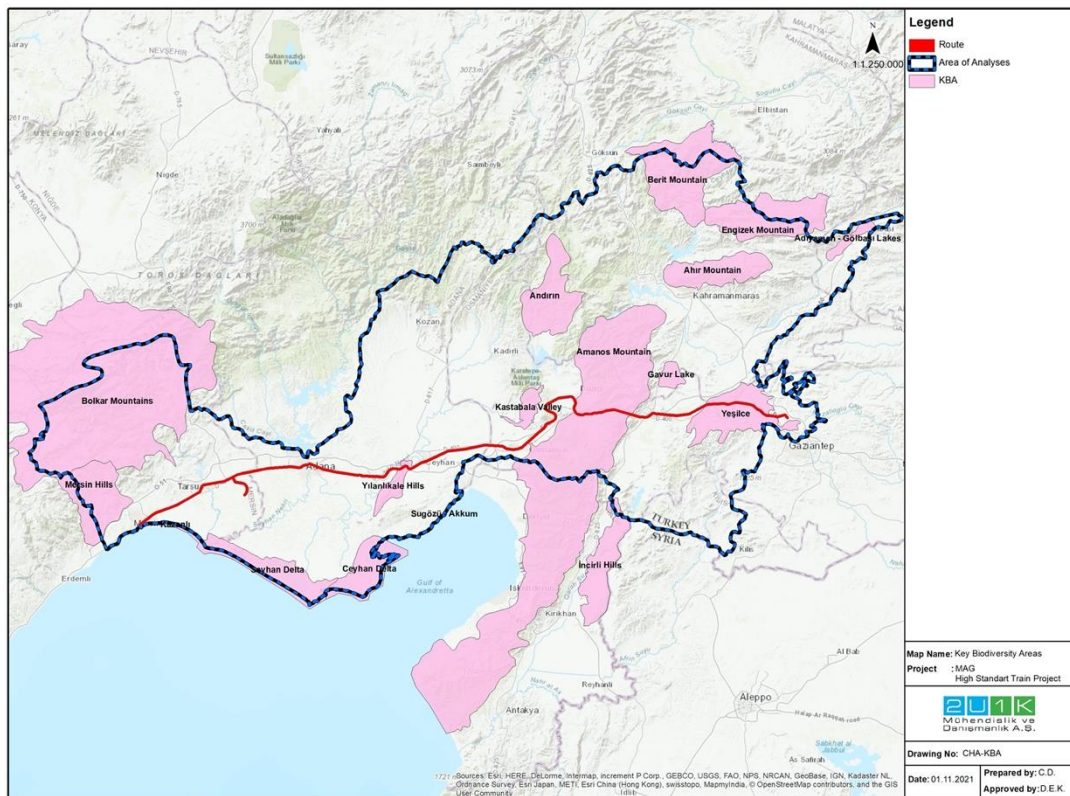


Figure 11-1 Key Biodiversity Areas

Appropriate fencing such as orange safety barrier fencing will be installed to protect sensitive habitats. Project construction sites and access roads will be separated from sensitive areas with appropriate fencing and signage. In sensitive habitat areas, pedestrian, equipment and vehicle access will be limited to the designated access to construction sites. Parking and driving off the designated access roads will not be allowed.

Flora

Delineation of areas to be cleared before the beginning of the construction activities in order to limit as much as possible the surface of vegetation to be cleared.

The Project has the potential to result in the loss of individuals from 39 endemic/restricted plant species populations. To prevent this, a relocation program will be implemented as specified in the BMP. Seeds of endemic / restricted range flora will be collected from the construction area to be used in the post-construction landscaping phase

There is a risk that construction could result in the spread of invasive plant species and loss of endemic/restricted range plant species. If any invasive plant species are identified along the Project route, an Invasive Species Management Plan will be established to stop the spread of invasive plant species.

Fauna

Construction of the Project is not expected to have a significant impact on terrestrial fauna species.

In certain areas, construction activities will be timed to prevent the breeding bird season. Where the works cannot prevent the bird breeding season, necessary vegetation clearing will be undertaken prior to the works and measures will be taken during construction to prevent birds from nesting in these areas to help minimize the impact of this measure on the overall construction schedule.

Throughout construction activities an ecologist will oversee works and remove animals (such as reptiles and amphibians) which may not be able to disperse quickly enough and would therefore be at risk of mortality. These animals will be moved to nearby suitable habitat.

Aquatic Ecology

There is the potential for loss of habitat resulting from pollution/sedimentation for aquatic ecology.

Construction work (bridge structures, drainage, temporary crossings and temporary works for structures) on rivers/streams and its tributaries between April and June will be avoided. To avoid any increase of the turbidity levels, sediment traps will be used, excavated materials will not be deposited or stored in or near freshwater features

11.6.2 Operational Impacts and Mitigation

The operation of the Project is not expected to result in significant effects in relation to habitats and flora. The measures to manage the increased risk of spreading invasive plants has been discussed within the preceding section.

Legally Protected Areas and Internationally Recognized Areas

In areas of highest potentially collision risk, the fencing for the Project will be adapted by installing additional pole sections to a height to 3 m, and coloured ribbons/tape will be attached

to the top of these poles to influence bird flight behaviour away from the rail corridor. Train speeds will be reduced 70 km/h in order to avoid collisions with birds at tunnel entrances and exits where there are intense bird flights and also IBAs

Fauna

The operation of the Project will not have significant effects on fauna, with the application of mitigation measures. Hard fences are erected to prevent the access of animals onto tracks. They are mostly constructed to reduce accidents due to collisions. The disadvantage of hard fences is that they increase the barrier effect. In most cases, hard fences must therefore be combined with wildlife passages. In these cases, they fulfil an important role in guiding animals to the crossing points.

Fauna crossing points (i.e., culverts) will be designed and installed along the railway. Culverts for animals are primarily constructed as safe crossing points for mammals.

Fences that will completely enclose the route will be applied at the tunnel entrances and exits. This fence will be 2 m high and additional pole sections will be installed to increase this height to 3 m and coloured stripes / tapes will be attached to these poles, which will affect bird flight behaviour. Fence height should be increased to 3m in additional pole sections. Poles will be strong enough to withstand wind / weather effects.

11.7 Archaeological and Cultural Resources

There are places of cultural importance along the Project route. In the cultural heritage management plan prepared specifically for the Project, the 'Project Construction and Archaeological and Cultural Heritage List in the Project Area of Influence' is specified. Mitigation measures to be taken during the construction of the Project are detailed in the Project's ESMMP report.

11.7.1 Construction Impacts and Mitigation

- The Cultural Heritage Management Plan will be used to inform all the requirements, procedures, resources and skills and timeline needed to minimise adverse cultural heritage effects. The Contractor will follow the national and international requirements with respect to “chance finds” which may emerge during construction.
- Regional Councils for the Conservation of Cultural Property will be the only decision maker on any intervention, which would be made on the site after the chance find.
- The Project Owner will mobilize cultural heritage/archaeological monitoring expert/s for the monitoring of ground disturbance activities within project including impact areas also will ensure that Chance Find Procedure is adequately enforced during all ground disturbance activities. They will be also responsible for the monitoring of the

implementation of the Cultural Heritage Management Plan (CHMP) and the Chance Find Procedure.

11.8 Visual Landscape

The Project pass through the land on Mersin, Adana, Osmaniye and Gaziantep Province. Length of the railway in each Province borders are 76 m km in Mersin, 79 km in Adana, 58 km in Osmaniye and 56 km in Gaziantep. The center of Railway Line is taken as a reference, 30 m buffer (15 m to the right and 15 m to the left) in the Mersin-Gaziantep Railway Line and 70 m (35 m to the right and 35 m to the left) buffer for the airport connection has been determined. The 30 m buffer area does not contain any areas of National Parks, Nature Parks or Wildlife Protection and Development Areas.

Major land use depending on the Project will be on 669.50 ha of permanently irrigated land, 252.13 ha of industrial/ commercial, 150.26 ha of complex cultivation patterns and 114.65 ha of discontinuous urban fabric. The following main visual receptor types have been identified within the 30 m buffer area:

- Views from residential properties,
- Views from adjoining public open spaces,
- Views from commercial / industrial properties; and
- Views along the existing transport network, including both road and rail users.

Views represented both long-range and short-range views of the Project, from a range of different visual receptors along the length of the Project are presented in the ESIA.

11.8.1 Construction Effects and Mitigation

The Project will result in direct impacts to landscape character, due to changes in landuse, alterations in topography, loss of established woodland/scrub, and alteration of structures. The Project will result to a permanent change to the character of the landscape through the addition of a new, permanent linear feature and associated infrastructure. The Project, for the most part, closely follows the alignment of the existing railway. This reduces impacts on surrounding receptors as the new railway would be seen together with the existing railway and its infrastructure (rather than as new, detracting features). In these locations, the Project is not anticipated to adversely impact the existing landscape character.

Where the Project diverges from the alignment of the existing railway, the impacts will be greater, and they will need to be managed. As required in the ESMMP, a Landscape Management Plan will be produced that will contain measures to minimise landscape character effects, such as replacement tree planting.

The Project will result in visual impacts associated with demolition of properties, visual awareness of construction activities, vegetation clearance resulting in the opening of views, and changes to views, due to the introduction of new structures. The greatest visual effects will occur where the Project is near residential areas. Following the application of measures in the Landscape Management Plan and ESMMP, the Project is expected to have temporary significant visual effects on the settlements and residential properties during construction.

11.8.2 Operational Effects and Mitigation

The Project is expected to result in visual effects on landscape character at the residential areas during construction period. During the first year that the Project is operational, effects are anticipated to be significant. Settlements and residential properties most affected by the Project. The majority of these significant effects will reduce to not significant after 15 years, once landscape planting is established.

11.9 Population

The project has the potential to increase the population in the region by creating employment opportunities both during construction and operation and increasing access to employment opportunities, business and commerce. Therefore, it has the potential to reduce unemployment and poverty.

11.9.1 Construction Impacts and Mitigation

Recruitment will be made for various departments during the construction period of the project. In order to ensure that the resulting population is in harmony with the local communities, the mitigation methods specified in the Project's ESMMP report will be implemented to ensure that the local people living in the Project's impact area are not adversely affected.

- Among these measures, contact with local communities will be minimized through the facilities (medical facilities, laundry, canteen, cooking facilities, social facilities) that will be included in the accommodation of the Project workers.
- A common work ethic will be created with the trainings to be given on the code of conduct to be followed by the employees, and thus the disciplinary procedure will be clearly communicated to everyone. Recruitment will be made with priority given to local people as far as possible and practical. Recruitment will be carried out in accordance with the employment plan to be prepared before the construction process, in a way that will not cause additional population growth on the local community.
- In order to prevent the increased risk of illicit behaviour and crime, payments will be made through bank accounts and adequate wages will be provided to all employees. Discrimination behaviours in the workplace (gender, age, race, language, religion, disability, physical characteristics) will be recorded and monitored through the grievance mechanism detailed in the Project's SEP report. Market prices will be paid

for purchases of goods, services, land and labour to avoid a direct increase in local prices for goods, services, land and labour.

11.9.2 Operational Impacts and Mitigation

Mitigation measures to be implemented during the operation period of the Project are detailed in the Project ESMMP report and the main mitigation measures are given below:

- Maintain accessible infrastructure and train facilities for the elderly, the disabled and those with reduced mobility (both men and women) and pregnant women,
- A zero-tolerance process against discrimination against women workers will be implemented, TCDD Transport will train human resources personnel to address and deal with discrimination issues in the workplace.
- All grievances will be recorded, monitored and resolved according to the grievance mechanism procedure given in the Project's SEP report.

11.10 Infrastructure

The Project will use the infrastructure facilities in the Project impact area both during the construction and operation period and the following measures will be taken in order not to put pressure on the existing infrastructure.

11.10.1 Construction Impacts and Mitigation

Mitigation measures to be implemented during the construction period of the Project are detailed in the Project ESMMP report and the main mitigation measures are given below:

- An effective grievance mechanism, detailed in the Project's SEP report, will be put in place to record, prevent and address complaints so that they do not adversely affect the services in the Project area of influence. (e.g. Electricity and water cutoffs, traffic blockages, disruption of local roads where patients are travelling to hospitals daily). Infrastructure improvement/rehabilitation will be implemented when necessary.
- Construction workers will be trained on good practices in resource efficiency.
- Engagement will be made with local authorities on the issue of traffic movement during construction phase. Residents in nearby communities will be informed about the transport routes to be used and used.
- The Project Owner will cooperate with the responsible authorities when necessary improvements for local infrastructure are required.

11.10.2 Operational Impacts and Mitigation

It is foreseen that the Project will not have a negative impact on infrastructure services during the operation period. However, in case of a possible infrastructure deterioration, TCDD Transport to be in close coordination with the related local authorities to curtail inconvenience to the residents of the Project area.

11.11 Economy

The project will provide employment opportunities with the recruitment plan to be implemented during the construction and operation period. Relevant mitigation methods will be applied in order to reduce the negative impacts that may occur on the agricultural lands in the impact area of the Project.

11.11.1 Construction Impacts and Mitigation

Mitigation measures to be implemented during the construction period of the Project are detailed in the Project ESMMP report and the main mitigation measures are given below:

- In order to increase employment opportunities for local people within the Project area, the REC will employ local workers, preferring suitably qualified and experienced applicants from local communities close to the Project. Legal work permits will be checked while recruiting Syrians under temporary protection and all employees.
- Collaboration will be made with Mukhtars, local authorities and NGOs in the Project impact area for employment.
- In order to create equal opportunity, discriminatory language will not be used in job postings. All working areas will be made suitable for the use of vulnerable groups (women, disabled people) as detailed in the Project's SEP report.
- Monitoring, evaluation and compensation support will be provided for PAPs who have lost income due to the project.
- The grievance mechanism will be strengthened and operated along the entire routes, all complaints will be recorded and resolved in accordance with the GRM procedure.

11.11.2 Operational Impacts and Mitigation

During the operation phase of the Project, employment opportunities will be created directly and indirectly, and thus economic development will be provided in the region. The following mitigation measures will be implemented for employment opportunities and economic development.

- Environmental and social arrangements will be made to ensure working conditions that take into account gender equality and offer equal opportunities to all segments in the business area, office areas and all other working areas.
- Employment policy and procedures of the Employer should aim to provide opportunities for employment of local workforce to the extent possible considering unskilled, semi-skilled, and skilled workforce, and giving priority to vulnerable persons (especially those who will be economically disabled). Priority will be given to Social Aol.
- TCDD transport should require and develop policies for a fair and transparent, gender-neutral recruitment process for all job openings. The Project Owner should seek to employ PAPs on each Sector of the Project route.
- The operation phase of the MAG High Standard Railway will seek to promote local employment (including job training for the operational activities) and purchase local goods and services to the extent possible.

11.12 Land Acquisition

Within the scope of the Project, land acquisition along the route of the Project is required. The locations where the land will be acquired, and the details of the land acquisition are specified in the Project's RAP report. The Livelihood Restoration Plan has been prepared for the Project affected people and necessary mitigation measures will be implemented for the Project affected local people during the land acquisition.

11.12.1 Construction Impacts and Mitigation

In the ESMMP report of the Project, the mitigation measures that need to be addressed for land acquisition are described in detail, and the topics covered are as follows:

- Permanent acquisition of lands
- Impacts on Agricultural lands
- Temporary land allocation
- Damage to crops during construction
- Physical and economic displacement of PAPs

A Livelihood Restoration Plan (EMP) will be prepared and implemented for the people affected by the Project. Project SEP Report including grievance mechanism will be implemented and all grievances related to the expropriation process will be recorded and monitored. Pay compensation and all resettlement rights must be secured before physical or economic displacement and construction work begins. The Resettlement Action Plan should be implemented under close supervision throughout the project implementation.

11.12.2 Operational Impacts and Mitigation

The entire land acquisition process will be completed before the Project's into operation period and there is no impact to occur during the operation period of the Project.

11.13 Ecosystem Services

Reviews on the use of ecosystem services for all stakeholders in the area of influence and affected by the Project are given in the RAP. As a result of the research, it has been seen that there are stakeholders dealing with beekeeping in the impact area.

11.13.1 Construction Impacts and Mitigation

Impacts that may be relevant to stakeholders who use forest lands and beekeeping during construction activities:

- Stakeholders have access problems in collecting firewood, weeding and hunting,
- Affecting households earning income from commercial logging activities
- Dust-related inefficiency on beekeepers' livelihoods may occur.

Mitigation measures to be taken in the project area regarding ecosystem services during the construction phase are detailed in the ESMMP report. Major mitigation measures are given below,

- Monitoring will be held within the scope of the RAP to analyze the livelihood impacts of the beekeepers
- These project-affected areas and settlements will be monitored and followed during the construction intensification,
- It will be ensured that all people living in these Project affected areas and settlements are aware of the Project grievance lines and grievance reporting tools,
- Local authorities and the villagers will be informed before the construction activities within the forest land not to create any limitation on firewood collection, herbs collection and hunting.
- Hunting and collection of wild animals will be strictly prohibited within the Project area.
- Maintain ongoing engagement between the Project and local communities, with communities informed in advance of any vegetation clearing to allow pre-harvesting of resources such as wood fuel, mushrooms, building materials or other useable resources.

11.13.2 Operational Impacts and Mitigation

It is foreseen that the impacts related to the ecosystem services during the project operation phase may be related to the accessing to forestlands and beekeeping activities. Mitigation measures to be taken in the project area regarding ecosystem services during the operation phase are detailed in the ESMMP report. A detailed “Resettlement Action Plan” will be implemented to identify PAPs who will be affected by the impacts on their livelihoods as a result of access to ecosystem services. Access to the ecosystem services will be ensured by providing required overpasses and underpasses.

11.14 Labour and Working Conditions

Labour and Working Conditions is very wide and diverse in scope. In addition, it has some basic principles for its implementation and planning. These principles:

- The right to work in a health and safety job is the right of all employees.
- Creating a policy at a level that all interested parties can implement,
- Creating a management system that can be developed and examined periodically,
- Occupational Health and safety policies and programs should be focused on prevention and protection,
- Created policies and programming should cover all workers.

The Project will provide formal contracts, adequate facilities for workers, measures to avoid discrimination, monitoring and inspections on site, including in relation to child labour, forced labour and other unlawful activities. The required mitigation will ensure the risks associated with labour and working conditions are not significant. Rönesans Human Resources Policies and Procedures should seek to apply gender diversity principles in all the phases of recruitment, selection, training, development and promotion of all employees. Mitigation measures to be taken in the project area regarding Labour and Working Conditions during the construction phase are detailed in the ESMMP report.

11.14.1 Construction Impacts and Mitigation

Workers’ rights including occupational health and safety need to be considered to avoid accidents and injuries, loss of man-hours, labour abuses and to ensure fair treatment, remuneration and working and living conditions. These issues should be considered not only for those who are directly employed by the Project, but also their sub- contractors and those within the supply chain. REC engages with fair labour and working conditions in its policies and procedures.

The Project will provide formal contracts, adequate facilities for workers, measures to avoid discrimination, monitoring and inspections on site, including in relation to child labour, forced

labour, gender-based discrimination and other unlawful activities. The required mitigation will ensure the risks associated with labour and working conditions are not significant.

The REC shall develop a Human Resources Policy and Labour Management and Monitoring Plan as well as specific recruitment policies and procedures

11.14.2 Operational Impacts and Mitigation

TCDD Transport have advised that they will have contracts for all the operational workers and will follow national laws covering aspects such as minimum wage, paid leave, insurance, equal opportunity and any collective dismissal. The ESMMP set out further measures that will be implemented to enhance these processes.

TCDD Transport will monitor suppliers in relation to social and labour aspects and include requirements in their procurement contracts in addition to health and safety and technical requirements. It is anticipated that labour, working conditions and supply chain effects will not be significant, following the implementation of the required mitigation measures.

11.15 Occupational Health and Safety

REC will prepare a Health, Safety and Security Plan (including occupational health and safety (OHS), which has been created within the scope of Occupational Health and Safety. In the activities carried out in line with this plan, responsible people are appointed, and management is ensured by taking necessary OHS measures. Mitigation measures to be taken in the project area related to OHS are given in ESMMP.

11.15.1 Construction Impacts and Mitigation

Bearing in mind the nature of the activities being undertaken during construction, worker health and safety is a key risk area with the potential for accidents that may result in injuries and potentially fatalities as well as lost man- hours.

Common activities undertaken during construction such as the movement of heavy machinery, demolition and excavation, electrical works, handling of chemicals, and works undertaken at height, can all introduce significant risk to the health and safety of the construction workforce. The Project Technical Specifications details the specifications and standards that need to be complied with by the contractor, once they have been appointed. Following the implementation of the mitigation required in the ESMP, effects to occupational health and safety are not considered significant.

11.15.2 Operational Impacts and Mitigation

There will be OHS risks during operation, associated with maintenance and inspection requirements. The severity and likelihood of risks during operation will be dependent on the frequency and requirements of planned and unplanned maintenance. The operation and

maintenance team will be required to prepare a robust Operational Maintenance Plan to appropriately manage these risks, as set out in the ESMMP. An Emergency Preparedness and Response Plan, covering the emergency situations (involving vehicles and pedestrians) that may occur during the operation phase, will be prepared and implemented by trained personnel in order to avoid significant risks.

11.16 Community Health and Safety

The following topics related to Community Health and Safety during the construction and operation period of the Project are included in SIA and ESMMP.

- Disturbance to environmental health, quality of life and wellbeing during construction phase
- Increased risk of communicable diseases and burden on local health services:
- Increased traffic and rise in accidents
- Security around the Project site
- Flood risk during construction and operation
- Level crossings safety
- Noise during operation
- Transport of dangerous goods

11.16.1 Construction Impacts and Mitigation

Construction can lead to an increase in noise and air pollution, reduced safety due to the movement of construction plant and construction activities, and reduced safety as a result of unauthorized access to construction works and equipment. The influx of foreign labour may also reduce safety or the feeling of safety and security for local families, women and children. The project could have impacts on Community Health, Safety and Security Impacts in both urban and rural areas. These impacts were evaluated in SIA and ESMMP by dividing them into separate titles in urban and rural areas in order to determine mitigation measures correctly.

11.16.2 Operational Impacts and Mitigation

The operational health and safety impacts on local communities, will be reduced by the design measures to exclude them from the Project, such as security fencing and the provision of regularly spaced underpasses and overpasses, bridges, viaducts and tunnels, instead of level crossings. The existing stations along the Project where the trains will stop, will be equipped with security guards and gates.

12 MANAGEMENT AND MONITORING OF IMPACTS

An ESMMP has been produced for the Project, which contains the mitigation identified in relation to the above effects. This will be maintained as a live document and its implementation will be a requirement of AYGM, REC, TCDD, TCDD Transport and their contractors. Fulfilment of these ESMMP commitments will be further monitored by the Lenders.

The construction contractor will be required to fully implement the requirements of the ESIA and the ESMMP, during their preparation of the final design and during construction. Independent audits will be undertaken to ensure that these requirements are fully implemented.

13 STAKEHOLDER ENGAGEMENT PLAN AND GRIEVANCE MECHANISM

A SEP has been developed for the Project, it identifies key stakeholders and set out engagement activities to ensure that, where relevant, stakeholders are informed in a timely manner of the potential effects of the Project. Stakeholders are individuals and organizations that may be directly or indirectly affected by the Project either in a positive or negative way, who wish to express their views.

13.1 Grievance Mechanism

A Project-level Grievance Mechanism (GM) has been established and is a process for receiving, evaluating and addressing Project-related complaints for anyone with concerns about, or affected by, the Project.

13.1.1 Internal (Worker) Grievance Management Process

Employees, who may be direct workers or third party/subcontractor's workers, are encouraged to submit written complaints, comments and concerns. Since the confidentiality of the complainant should be preserved, grievances are collected in grievance boxes which will be placed in areas workers can easily access, including dining rooms. Through these forms, workers will also be able to make anonymous complaints. Information on how to express complaints, opinions and suggestions to workers will be provided during the orientation training process. Written submissions will not be shared and used in any way to force or intimidate those submitting the complaints.

13.1.2 External Grievance Management Process

The steps of the grievance management process consist of receiving the grievance, assessing, sending acknowledgment, investigating, feedback to stakeholder, implementing the remediation activities and closeout which process are defined below sections in detail. These steps are also the management process of the internal grievance of the Project.

13.2 Construction Phase Grievance Mechanism

Complaints can be raised verbally or written, via the following channels during construction:

- Occupational Health and Safety And Environmental Manager Hasan Taşkan,
 - Tel: +90 505 600 66 36
 - Email Address: hasan.taskan@ronesans.com
- Stakeholders can fill out the grievance form forms online at: <http://www.mersingaziantepyht.com>

- Face to Face: Stakeholders, including the public, can discuss their grievance with assigned personnel of CLO at Project area.
- Public Grievance Mechanism Paper Form: Stakeholders including the public, can fill in the paper grievance form in given below either send it to REC's offices, or email it to hasan.taskan@ronesans.com

REGISTRATION DOCUMENT NUMBER: _____	
<i>Registration date:</i>	
<i>Type of the registration:</i> ☐ Complaint. ☐ Recommendation. ☐ Request	
1. Subject heading of the request 2. Environmental Impact 3. Internal employer complaint - H&S Issues 4. Labor Management & Employment Issues 5. Gender Issues 6. C-Tip 7. Harassment	8. Land Use/ Land Damage 9. Community health and safety 10. Worker's health and safety 11. Stakeholder engagement/ consultation issues 12. Social impact on vulnerable groups 13. Traffic and Road safety 14. Procurement
Personnel name and surname received the request:	
Complainant/ Stakeholder information.	
*** ☐ I do not prefer to give my personal information; I request my complaint is to be recorded in ANONYMOUS.	
<i>Name and Surname of the Complainant/ Stakeholder:</i> <i>Gender:</i> <i>Profession- institution:</i> <i>Unit (if stakeholder is an PAKSEL or Contractor employee):</i>	Contact info: <i>Phone number:</i> <i>E-mail:</i> <i>Address:</i>
Description of the of the Request:	
Communication preferences/ the method to use for feedback:	
☐ Face-to-face consultation ☐ Via telephone. ☐ via the E-mail ☐ via post/ letter ☐ via other communication way: ☐ I do not prefer to give my personal information and I do not to prefer to receive feedback.	
<i>Unit-Personnel Evaluated the Request:</i> Actioned unit:	
<i>Unit-Personnel Evaluated the Request:</i> Responsible personnel:	
Evaluation process result/ decision:	
Planned corrective action:	
Complainant's opinion on corrective action	
☐ Accepted ☐ Rejected ☐ Another suggestion:	
Corrective action date:	
Corrective action result:	

Stakeholder satisfaction status and opinion:	
Complaint closing date:	
Personnel name-surname: Signature of the Personnel who closed the complaint:	Complainant/ Stakeholder signature.

- Complaint-Wish Notification Form For The Wish-Complaint Boxes

COMPLAINT-WISH NOTIFICATION FORM NO: _____		COMPLAINT-WISH BOX NO: _____	
Date:	Type of the registration: ☐ Complaint ☐ Recommendation ☐ Request		
Complainant/ Stakeholder information. *** ☐ I do not prefer to give my personal information; I request my complaint is to be recorded in ANONYMOUS.			
Please Name and Surname:		Phone number:	
Gender:		E-mail:	
Profession- institution/ unit:		Address:	
Description of the of your complaint or request:			
Communication preferences/ the method to use for feedback ☐ Face-to-face consultation ☐ Via telephone ☐ via the E-mail ☐ via post/ letter ☐ via other communication way: ☐ I do not prefer to give my personal information and I do not to prefer to receive feedback.			

This Notification Form will be kept in print where these boxes are available and will be used as a means of submitting both anonymous and open complaints

13.3 Operation Phase Grievance Mechanism

Complaints can be raised verbally or written, via the following channels during operation:

- Department Manager (Enviromental and Feasibility) / Environmental Engineer: **Ali Ketencioğlu**,
 - Tel: +90 312 203 10 00
 - Email Address: aygm.ozelkalem@uab.gov.tr
- Stakeholders can fill out the grievance form forms online at: <http://www.mersingaziantepyht.com>

- Online application: The above contact details will be updated by TCDD & TCDD Transport prior to operation of the Project and publicly disclosed on TCDD & TCDD Transport's website
- Public Grievance Mechanism Paper Form: Stakeholders including the public, can fill in the paper grievance form in given below either send it to AYGM's offices, or email it to aygm.ozelkalem@uab.gov.tr

REGISTRATION DOCUMENT NUMBER: _____	
<i>Registration date:</i>	
<i>Type of the registration:</i> ☐ Complaint. ☐ Recommendation. ☐ Request	
15. Subject heading of the request 16. Environmental Impact 17. Internal employer complaint - H&S Issues 18. Labor Management & Employment Issues 19. Gender Issues 20. C-Tip 21. Harassment	22. Land Use/ Land Damage 23. Community health and safety 24. Worker's health and safety 25. Stakeholder engagement/ consultation issues 26. Social impact on vulnerable groups 27. Traffic and Road safety 28. Procurement
Personnel name and surname received the request:	
Complainant/ Stakeholder information.	
*** ☐ I do not prefer to give my personal information; I request my complaint is to be recorded in ANONYMOUS.	
<i>Name and Surname of the Complainant/ Stakeholder:</i> <i>Gender:</i> <i>Profession- institution:</i> <i>Unit (if stakeholder is an PAKSEL or Contractor employee):</i>	Contact info: <i>Phone number:</i> <i>E-mail:</i> <i>Address:</i>
Description of the of the Request:	
Communication preferences/ the method to use for feedback:	
☐ Face-to-face consultation ☐ Via telephone. ☐ via the E-mail ☐ via post/ letter ☐ via other communication way: ☐ I do not prefer to give my personal information and I do not to prefer to receive feedback.	
<i>Unit-Personnel Evaluated the Request:</i> Actioned unit:	
<i>Unit-Personnel Evaluated the Request:</i> Responsible personnel:	
Evaluation process result/ decision:	
Planned corrective action:	
Complainant's opinion on corrective action	
☐ Accepted ☐ Rejected ☐ Another suggestion:	
Corrective action date:	
Corrective action result:	

Stakeholder satisfaction status and opinion:	
Complaint closing date:	
Personnel name-surname: Signature of the Personnel who closed the complaint:	Complainant/ Stakeholder signature.

- Complaint-Wish Notification Form for The Wish-Complaint Boxes

COMPLAINT-WISH NOTIFICATION FORM NO: _____		COMPLAINT-WISH BOX NO: _____	
Date:	Type of the registration: ☐ Complaint ☐ Recommendation ☐ Request		
Complainant/ Stakeholder information. *** ☐ I do not prefer to give my personal information; I request my complaint is to be recorded in ANONYMOUS.			
Please Name and Surname:		Phone number:	
Gender:		E-mail:	
Profession- institution/ unit:		Address:	
Description of the of your complaint or request:			
Communication preferences/ the method to use for feedback ☐ Face-to-face consultation ☐ Via telephone ☐ via the E-mail ☐ via post/ letter ☐ via other communication way: ☐ I do not prefer to give my personal information and I do not to prefer to receive feedback.			

This Notification Form will be kept in print where these boxes are available and will be used as a means of submitting both anonymous and open complaints

