MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

HUMAN RIGHTS IMPACTS ASSESSMENT

NOVEMBER 2021

ANKARA

MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

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1. INTRODUCTION

This Human Rights Impacts Assessment (HRIA) study is prepared for the Rönesans Mersin - Adana -Gaziantep High Standard Train Project in Turkey carried out to support requirements inline with the requirements of Equator Principles IV (dated July 2020). A HRIA is an instrument for examining policies, legislation and programs to identify and measure their effects on human rights. Their fundamental purpose is to help prevent negative effects and to maximize positive effects. As such, HRIAs are an indispensable part of making human rights considerations operational in a range of legal and policy contexts.

Human rights are a set of principles and standards which seek to promote fundamental freedoms and human dignity. According to the Office of the United Nations High Commissioner for Human Rights (OHCHR), the principal United Nations office for human rights: “Human rights are rights inherent to all human beings, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Human rights impacts are influenced largely by the local human rights context and the nature of a project’s specific activities. To be consistent with the UN Guiding Principles, the full range of human rights impacts needs to be considered, including those caused or contributed to by the project, cumulative impacts, and those directly linked to the project, e.g., through business relationships. An adverse human rights impact occurs when an action removes or reduces the ability of an individual to enjoy her or his human rights. The human rights due diligence process, as articulated by the UN Guiding Principles on Business and Human Rights (2011), focuses companies on identifying and addressing adverse impacts; this is, therefore, the main focus of this assessment. It is important to note that, potential issue areas typically considered in ESIAs are similar to those that are key to human rights including but not limited to resettlement, community health and livelihoods topics.

Human rights impact assessment will be performed in line with Equator Principles 4 “Guidance Note on Implementation of Human Rights Assessments under the Equator Principles” to include at least the followings:

More detailed consideration of the country human rights context including at least the followings:

- Legal statuses protecting human rights (e.g., status of ratification of UN International Covenant on the Civil and Political Rights, the International Convention on the Elimination of All Forms of Racial Discrimination, the Convention on the Elimination of All Forms of Discrimination against Women, eight of ILO Fundamental Conventions)

- Identification of right holders at risk (e.g., ethnic minorities, migrant workers, elderly persons, women, children)
- Labour rights context
- Land tenure rights context
- Political and civil rights context (including freedom of expression and protest)
- Ecosystem services users' rights context
- Identification of key human rights risks relevant to the Project activities and their assessment based on the risks' significance
- Description of key principles adhered to by the Project to secure human rights of local communities and Project personnel
- Description of embedded controls and proposed mitigations to address the human rights risks identified.

2. LEGAL FRAMEWORK

Turkish legislation on the Human rights is given as a summary of the "POLICIES AND LEGAL FRAMEWORK" of the ESIA Report.

For the planned High Standard Train Project, both national regulations and relevant provisions given in international standards and conventions are provided.

The national regulations listed below are updated and changed over time. Updates and revisions in the relevant regulations and changes that will take place during the Project will be followed and implemented by Rönesans.

IFC's Sustainability Framework defines strategic commitments for The Projects. The standards defined within this scope are also an integral part of IFC's risk management approach. IFC's Environmental and Social Sustainability Policy and IFS Performance Standards are classified under 8 performance standards as follows;

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 2: Labor and Working Conditions
- Performance Standard 3: Resource Efficiency and Pollution Prevention
- Performance Standard 4: Community Health, Safety, and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement
- Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- Performance Standard 7: Indigenous Peoples
- Performance Standard 8: Cultural Heritage

The 2012 edition of IFC's Sustainability Framework, which includes the Performance Standards, applies to all investment and advisory clients whose projects go through IFC's initial credit review process after 1st January 2012.

Labour and Working Conditions	The Turkish Republic regulate the working conditions and work-related rights and obligations of employers and employees working under an employment contract. There is also secondary legislation that may apply to the project which include regulations on annual leave, working hours, overtime work, minimum wage, female and child employees. The Ministry of Family Labor and Social Services has published various communiques and circulars that set ground for the implementation of the Labor Law which may also be referenced during project implementation. • Labour Law (No: 4857) (Official Gazette date/no: 10.06.2003/25134) • Regulation on Working Duration Related to Labour Law (Official Gazette date/no: 06.04.2004/25425) • Regulation on Excess Work and Work in Excess Periods on Labour Law (Official Gazette date/no: 06.04.2004/25425) • Regulation on Special Principles in Works Carried out by Employing Workers in Shifts (Official Gazette date/no: 07.04.2004/25426) • Regulation on the Minimum Wage (Official Gazette date/no: 01.08.2004/25540) • Regulation on Suspension of Work in Workplaces (Official Gazette date/no: 30.03.2013/28603) • Regulation on Health and Safety Measurements Related to Carcinogens and Mutagens at Work(Official Gazette date/no: 06.08.2013/28730) • Regulation on the Works in Which Workers Shall Work Maximum Seven and Half Hours or Less in a Day in Terms of Health Rules (Official Gazette date/no: 16.07.2013/28709) • Regulation on the Procedures and Principles for the Employment of Children and Young Persons (Official Gazette date/no: 06.04.2004/25425)	Turkey is party to a multitude of ILO conventions, including but not limited to conventions on equal treatment of employees, gender equality, child labor, forced labor, Occupational Health and Safety (OHS), right of association and minimum wage. Accordingly, the current Turkish Labor Law (No.4857) is to large extent consistent with international requirements. According to IFC PS2 – Labor and Working Conditions, following objectives have been defined; To promote the fair treatment, non-discrimination, and equal opportunity of workers. To establish, maintain, and improve the worker-management relationship. To promote compliance with national employment and labor laws. To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain. To promote safe and healthy working conditions, and the health of workers. To avoid the use of forced labor. The EBRD PR 2 stablishes requirements for clients with respect to all project workers, including full-time, part-time, temporary, fixed-term, seasonal and migrant workers, whether engaged directly by the client or by a third party, and sets out specific requirements for primary suppliers. Projects are required to comply, at a minimum, with (i) national labour, employment and social security laws, (ii) the fundamental principles and standards embodied in the International Labour Organization (ILO) core conventions, (iii) and the PR 4.
Occupational Health and Safety	The recently ratified Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187) entered into force for Turkey in 16 January 2015. According to its accompanying Recommendation No. 197, members should prepare and regularly update a national profile which summarizes the existing situation on occupational safety and health and the progress made towards achieving a safe and healthy working environment. It is against this background and taking into account the guidance provided in Recommendation No. 197 that the present National OHS profile has been prepared. The Ministry of Labour and Social security is the main responsible organization in this field, in col- laboration with other ministries and stakeholders, and is	Turkey hosts international activities in collaboration with the international organizations ILO, World Health Organization (WHO), European Union (EU), United Nations Environment Programme (UNEP), United Nations Development Programme (UNDP), and many others organizations. On the other hand, trade unions and employers' organizations have relationships and collaborative activities with their international partner organizations regarding occupational safety and health. Acording to IFC PS4 – Community Health, Safety and Security, The Project

	responsible for developing, implementing and enforcing legislation. National regulations covering directly the essential aspects of Occupational Health and Safety are; • Occupational Health and Safety Law (No: 6331) (Official Gazette date/no: 30.06.2012/28339) • Occupational Health and Safety Risk Assessment Regulation (Official Gazette date/no: 29.12.2012/28512) • Regulation on the Provisions of Occupational Health and Safety Training of Employees (Official Gazette date/no: 15.05.2013/28648) • Regulation on Occupational Health and Safety Services (Official Gazette date/no: 29.12.2012/28512) • Communiqué on Danger Class Lists Related to Occupational Health and Safety (Official Gazette date/no: 26.12.2012/28509) • Regulation on Duties, Authority, Responsibilities and Trainings of Occupational Health and Safety Specialists (Official Gazette date/no: 29.12.2012/28512) • Regulation on the Occupational Health and Safety Committees (Official Gazette date/no: 18.01.2013/28532) • Regulation on the Health and Safety Measures to be taken in Workplace Buildings and Additions (Official Gazette date/no: 17.07.2013/28710) • Regulation on Health and Safety at Construction Works (Official Gazette date/no: 05.10.2013/28786) • Regulation on the Tasks, Authority, Responsibility and Education of On-Site Doctor and Other Health Personnel (Official Gazette date/no: 20.07.2013/28713) • Regulation on Health and Safety Requirements in the Use of Work Equipment (Official Gazette date/no: 25.04.2013/28628) • Regulation on Manual Handling (Official Gazette date/no: 24.07.2013/28717) • Regulation on Protection of Buildings from Fire (Official Gazette date/no: 19.12.2007/26735) • Regulation on the Emergency Cases in Workplaces (Official Gazette date/no: 18.06.2013/28681) • Regulation on the Use of Personal Protective Equipment in Workplaces (Official Gazette date/no: 02.07.2013/28695) • Regulation on Safety and Health Signs (Official Gazette date/no: 11.09.2013/28762) • First Aid Regulation (Official Gazette date/no: 29.07.2015/29429)	will anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances. The Projectwill ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities in accordance with the IFC PS4. According to EBRD PR 4; the client will adopt measures to identify and prevent accidents, injury and ill-health to workers and project-affected communities arising from or associated with, or occurring in carrying out project activities and prepare and implement preventive and protective measures and plans to manage health and safety risks in accordance with the hierarchy of risk control and in accordance with GIP. The client will provide all workers with a safe and healthy workplace, taking into account inherent risks in its particular sector and specific classes of hazards that may be present. The client will identify the safety and health risks and protection measures appropriate to the stage, size and nature of the project in accordance with relevant substantive EU Occupational Safety and Health standards and GIP. The client will undertake an assessment commensurate to the level of risk and develop a project specific safety and health plan, where appropriate, that will be integrated into the Environmental and Sociak Managament System. The plan will be periodically reviewed to evaluate its effectiveness to address related risks.

	• Regulation on the Protection of the Workers against Risks Relevant to Noise (Official Gazette date/no: 28.07.2013/28721) • Regulation on the Protection of the Workers against Vibration Risks (Official Gazette date/no: 22.08.2013/28743) • Regulation on the Control of Dust Emissions (Official Gazette date/no:05.11.2013/28812) • Regulation on Occupational Health and Safety in Temporary or Fixed Term Employment (Official Gazette date/no: 23.08.2013/28744) • Regulation on Health and Safety Measures in Works with Chemical Substances (Official Gazette date/no: 12.08.2013/28733) • Regulation on Protection of Workers from Dangers of Explosive Environments (Official Gazette date/no: 30.04.2013/28633) • Regulation on Machinery Safety (Official Gazette date/no: 03.03.2009/27158) (last amended on 01.01.2017) • Regulation on Occupational Training of the Employee to Work in Dangerous and Very Dangerous Class Workplace (Official Gazette date/no:13.07.2013/28706) • Law on the Protection of Life and Property (No. 4922) (Official Gazette date/no: 14.6.1946/6333)	
Participation - Stakeholder engagement and community consultation	In terms of Turkish regulatory requirements, the scope of both terrestrial and marine sections of the Project falls within the scope of the Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette date/number: 25.11.2014/29186). In the EIA regulation, petrochemical facilities (i.e. terrestrial section) and ports (i.e. marine section) fall under Annex I (i.e. Item 31 – Storage Facilities for Oil, Natural Gas, Petrochemical and Chemical Substances with Capacity of 50,000 m3 and above, Item 6/a – Production of organic chemicals for terrestrial section and Item 9/b – Water ways, ports and shipyards; Commercial ports, jetties, quays and dolphins suitable for marine vessels with 1,350 DWT weight or above); therefore, the Project is subject to full EIA process. At the time of preparation of this Draft ESIA Report, the Final EIA Report for the Polypropylene Production Facility and the Draft EIA Report for the Raw Material Supply, Storage and Port Facility Project (CPIR Port) have been submitted to Ministry of Environment and Urbanization (MoEU). The EIA decisions for both Projects are currently awaiting. Key Legislation in European Union and International Reference Documents that are relevant to the Project are presented below: • Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment	IFC Performance Standard 1 establishes the importance of effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them. In addition, PS 5 Land Acquisition and Involuntary Resettlement includes the following statement on the Steakeholder engagement: - Effective resettlement planning requires regular communication and consultation with a wide range of project stakeholders, - For the purpose of Performance Standard 5, the key takeholders groups are the displaced persons and the host community, - Early communication helps to manage public expectations concerning the impact of a project and its expected benefits. When international standards are evaluated, it is seen that the stakeholder participation process is considered as a process that should be continued uninterruptedly from the beginning of the expropriation decision-making process to the end of the project.

	• Directive 2003/4/EC of the European Parliament and of the Council of 28 January 2003 on public access to environmental information	EBRD PR 10 recognizes the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. The Stakeholder Engagement Plan will describe how engagement with identified stakeholders will be carried out throughout the project life cycle, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The SEP will be tailored to take into account the main characteristics (including gender) and interests of the project-affected parties and other interested parties and distinguish between the different levels and methods of engagement that might be appropriate for each. The level of detail needed will be determined on a case-by-case basis. Resources available for stakeholder engagement will be outlined within the SEP. The SEP will be updated as necessary during the project life cycle.
Child Labor	Turkey attaches special importance to elimination of child labour, has been actively combating against child labour since the beginning of 1990s and provides coordination and cooperation between public institutions and organizations, workers' and employers' organizations, non-governmental organizations working on child labour. The definition of child labour was made in Article 4 of the Regulation on the Procedures and Principles of Employing Children and Young Workers, which was issued on the basis of Article 71 of the Labour Law No. 4857. Turkey has approved the United Nations Convention on the Rights of the Child, which is one of the most widely accepted human rights documents in the world today, in 1994, the ILO Conventions which are the fundamental conventions of the International Labour Organization, No. 138 concerning Minimum Age for Admission to Employment in 1998 and No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour in 2001. The Turkish Labour Law allows children to perform light work that does not interfere with their school attendance from the age of 14 and establishes 16 as the minimum age for regular employment. The law prohibits children younger than 16 from performing arduous or dangerous work. The government	As stated in EBRD PR 2, the client will not employ children in a manner that is economically exploitative, or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development. Young people below the age of 18 years will be identified by the client and will not be employed in hazardous work. All work of persons under the age of 18 shall be subject to an appropriate risk assessment prior to the work commencing and regular monitoring of health, working conditions, and hours of work.

	prohibited children younger than 18 from working in certain professions or under hazardous conditions. In 2018, Turkey made an advancement in efforts to eliminate the worst forms of child labor. The government signed a Joint Declaration on the Elimination of Child Labor, declaring 2018 as the Year of Elimination of Child Labor. In addition, 355 labor inspectors, 81 provincial directors, and 320 teachers were trained on child labor. “National Time-Bound Policy and Programme Framework for the Elimination of the Child Labour (2005-2015)” was prepared in 2005 in accordance with the ILO Convention No.182 by our Ministry with the contributions of all relevant institutions and organizations and implemented. The policy and programme framework, which was completed in 2015, was updated for the 2017-2023 period and the National Programme on the Elimination of Child Labour (2017-2023) was prepared.	
Prohibition of Forced or Compulsory Labor	Turkey has not yet ratified the Protocol of 2014 (P029) to the Forced Labour Convention. The main measure within the Turkish legal system is the Article 18 of the Constitution which bans every type of forced labour. Articles 80 and 117 of the Turkish Penal Code (as amended on 6.12.2006 by the Act No.5560) also punish forced labour. The Labour Act provisions are and in cases outside of its scope, provisions of the Code of Obligations apply. The key authority for the effective and sustained suppression of all forms of forced or compulsory labour is the General Directorate of Labour under the Ministry of Family,Labour and Social Services. Furthermore, the General Directorate of Migration Management under the Ministry of Interior is responsible for combatting human trafficking and providing protection to the victims of forced or compulsory labour within the human trafficking process. A National Task Force was established under the Ministry of Foreign Affairs in October 2002 to coordinate the activities of the public authorities and institutions in combatting human trafficking. Furthermore, "Regulation Concerning Combatting Human Trafficking and Protection of Victims" was put into effect by its publication in the Official Gazette on 17.03.2016.	According to EBRD PR 2, the client will not employ forced labour, which consists of work or service not voluntarily performed that is exacted from an individual under threat of force or penalty, including through abusive and fraudulent recruitment practices. This includes involuntary or compulsory labour, such as indentured labour, involuntary prison labour, bonded labour or similar labour-contracting arrangements, or trafficking in persons. Where there is a risk of child and/or forced labour, the client will monitor its primary suppliers on an ongoing basis in order to identify any significant changes in its supply chain and new risks or incidents of child and/or forced labour.
Migrant Workers	The key law concerning migrant workers in Turkey, the International Labour Force Law (ILFL, 2016), defines a migrant worker using the term ‘foreigner’ as; someone who is not a citizen of the Republic of Turkey. This Law continues to define a foreigner (in the context of migrant workers) similar to its predecessor, the Law on Work Permits for Foreigners (LWPF, 2003), which takes the Citizenship Law (CL, 2009) as guidance. Act No. 6735 on International Labour Force dated 28 July 2016	According to EBRD PR 2, the client will identify migrant workers and ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out the same work. The Project will implement the requirements of the IFC PS2 – Labor and Working Conditions which are;

	Act No. 6552 dated 10.09.2014 to amend the Labour Act and some Acts and Decrees having force of Law and restructuring some public receivables. Act No. 5951 amending the Act No. 6183 concerning debt collection procedures by public law and amending some other Acts. Regulations of 29 August 2003 for the application of the Act on work permits for foreigners. Employment laws in Turkey apply to Turkish nationals and foreign nationals alike. In addition, special provisions exist which regulate the employment and residence permits of foreign nationals who intend to work in Turkey. The government implemented a work permit system for registered Syrian adults with special temporary protected status; however, applying for a work permit was the responsibility of the employer, and the procedure was sufficiently burdensome and expensive that relatively few employers pursued legally hiring refugees. As a consequence, the vast majority of both conditional refugees and Syrians under special temporary protection remained without legal employment options, leaving them vulnerable to exploitation, including illegally low wages, withholding of wages, and exposure to unsafe work conditions. Women, refugees, and migrants were vulnerable to labor trafficking. Although government efforts to prevent trafficking continued with mixed effect, authorities made improvements in identifying trafficking victims nationwide. Penalties for conviction of trfficking violations were sufficiently stringent compared with other serious crimes.	To promote the fair treatment, non-discrimination, and equal opportunity of workers. To establish, maintain, and improve the worker-management relationship. To promote compliance with national employment and labor laws. To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain. To promote safe and healthy working conditions, and the health of workers. To avoid the use of forced labor.
Equal opportunities, non-discrimination	The Law on Human Rights and Equality Institution became effective with its publication in the Official Gazette of 20 April 2016. With this law, which comprises 30 articles, protection against discrimination is strengthened in Turkey. The constitution permits measures, including positive discrimination, to advance gender equality. To encourage the hiring of women, the state paid social services insurance premiums on behalf of employers for several months for any female employee older than age 18. Laws introduced as a gender justice initiative provided for maternity leave, breastfeeding time during work hours, flexibility in work hours, and required child care by large employers. Turkey had its Human Rights Institution established by Law no. 6332 in June 2012. The Human Rights Institution has now been restructured and replaced by the Human Rights and Equality Institution. The Human Rights and Equality Institution, a public legal entity with administrative and financial autonomy, is attached to the Prime Ministry (Article 8). The Human Rights and Equality Board is the decision-making body of the Institution (Article 10/1). The Board shall consist of eleven members, including a President and a Vice President. Three members shall be appointed	According to EBRD PR 2, the client will: • not make employment decisions on the basis of personal characteristics unrelated to inherent job requirements, such as gender, race, nationality, political opinion, affiliation to a union, ethnic, social or indigenous origin, religion or belief, marital or family status, disability, age, sexual orientation or gender identity; • base the employment relationship on the principle of equal opportunity and fair treatment, and will not discriminate with respect to any aspect of the employment relationship, including recruitment and hiring, job assignment, compensation (including wages and benefits), working conditions and terms of employment, including reasonable adaptation of the workplace related to disabilities, access to training, promotion, termination of employment or retirement, and discipline;

	by the President of the Republic and eight members by the Cabinet (Article 10/2). The Human Rights and Equality Institution is tasked with three functions (Article 1): Protection and enhancement of human rights; To ensure the right to equal treatment and to prevent discrimination in using rights and freedoms; and To serve as national prevention mechanism in the framework Optional Protocol to the Convention against Torture (OPCAT). (Human Rights Institution established by Law no. 6332 in June 2012 was entrusted this task with the Governmental Decree of 9 December 2013. Official Gazette 28 January 2014, No. 28896).	• take measures to prevent and address any form of violence and harassment, bullying, intimidation, and/or exploitation, including any form of gender-based violence
Gender Equality	Turkey has also ratified various international agreements that can serve as tools to protect women from violence and prevent discrimination. The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention) are good examples of such international agreements. According to the Law No. 5170 Article 90 of the Turkish Constitution, in- ternational agreements duly put into effect have the force of law, and in case of a conflict between international agreements concerning fundamental rights and freedoms and the laws, the provisions of international agreements shall prevail. This provision enables, or in fact obliges, the provisions of the CEDAW convention to be applied even in the absence of comprehensive anti-discrimination legislation.	See above. EBRD requires its clients to identify any potential gender specific and disproportionate adverse impacts and develop mitigation measures to reduce these. EBRD will require its clients to adopt measures to effectively prevent and address any form of violence, harassment, including sexual harassment, exploitation and abuse, gender- based violence, bullying, intimidation, and/or exploitation Also EBRD 4 states that, the client will assess project-related gender based violence risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities. Where appropriate, the client will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.
Land Acquisition and Expropriation	The right to property is protected and instituted as fundamental right by the Turkish Constitution. As a result, it is possible to restrict expropriation to what is only necessary for the public good. In this respect, partial expropriation and servitudes of immovables are just as possible as its total expropriation. In the scope of Turkish legal framework, land acquisition / expropriation is based on the Expropriation Law No: 2942 (amended by Law No: 4650 in 2001). In addition, Article 46 of the Turkish Constitution explains that state and legal public entities, in cases of public benefit, are entitles to entirely or partially expropriate immovable properties in private possession, on condition that the real value of those immovable properties are paid in advance and in cash; and to establish easement rights on these immovable properties in compliance with the procedures and principles set by expropriation law. In other words; Turkish Constitution implies that any immovable property cannot be confiscated unless its	PS5 encourages the use of negotiated settlements to avoid expropriation and forced evictions. Expropriation is only to be used as a last resort, if good faith negotiations fail and those affected reject compensation that meets the requirements of PS5. The IFC's focus is to mitigate the adverse impacts of the project where any adverse impacts are occured according to project land acquisiton, loss of livelihood or income should be funded by the project. This EBRD PR 10 addresses impacts of project-related land acquisition47, including restrictions on land use48 and access to assets and natural resources, which may cause physical displacement (relocation, loss of land or shelter), and/ or economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of

	expropriation compensation is paid to the owner/s in advance and in cash.	income sources or other means of livelihood). The objectives of this PR are to: • avoid involuntary resettlement or, when unavoidable, minimise involuntary resettlement by exploring feasible alternative project designs and sites; • avoid forced eviction; • mitigate unavoidable adverse social and economic impacts from involuntary resettlement on affected persons by: (i) providing timely compensation for loss of assets at full replacement cost; and (ii) ensuring that land acquisition, restrictions on land use, other assets and natural resources and involuntary resettlement activities are implemented with meaningful consultation, participation, and disclosure of information, in accordance with the requirements of PR 10; • improve, or as a minimum restore the livelihoods and standards of living of affected persons compared to pre-displacement levels; and • improve living conditions of physically displaced persons through the provision of adequate housing (including essential services and utilities) with security of tenure55 at resettlement sites.
Gender Equality	Turkey has also ratified various international agreements that can serve as tools to protect women from violence and prevent discrimination. The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention) are good examples of such international agreements. According to the Law No. 5170 Article 90 of the Turkish Constitution, in- ternational agreements duly put into effect have the force of law, and in case of a conflict between international agreements concerning fundamental rights and freedoms and the laws, the provisions of international agreements shall prevail. This provision enables, or in fact obliges, the provisions of the CEDAW convention to be applied even in the absence of comprehensive anti-discrimination legislation.	See above. EBRD requires its clients to identify any potential gender specific and disproportionate adverse impacts and develop mitigation measures to reduce these. EBRD will require its clients to adopt measures to effectively prevent and address any form of violence, harassment, including sexual harassment, exploitation and abuse, gender- based violence, bullying, intimidation, and/or exploitation Also EBRD 4 states that, the client will assess project-related gender based violence risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities. Where appropriate, the client will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.

2.1. Summary Assessment on Human Rights

"UN General Assembly National report of Turkey" and "Amnesty International Report 2020/21[1]" were evaluated within the scope of Turkey's current situation and international requirements on human rights.

Within the scope of the Amnesty International Report 2020/21 report, the evaluation of the current situation in Turkey has been gathered under the following headings;

- State intervention
- Pressures Against Opposition,
- Freedom of expression,
- The situation of human rights defenders,
- LGBT+ Rights,
- The rights of women and girls,
- Torture and other forms of ill-treatment
- freedom of assembly,
- enforced disappearances,
- Rights of Refugees, Asylum Seekers and Migrants.

In the *UN General Assembly National report of Turkey*, the following evaluations regarding the current situation in Turkey are included under the title of "Promotion and protection of human rights";

> In Turkey's constitutional system, the laws state that all individuals are equal for the law; “without any discrimination based on language, race, color, gender, political opinion, philosophical belief, religion, sect or the like”. Within the scope of anti-discrimination laws, Turkish Penal Code (TCK) (Law No. 5237), Civil Servants Law (Law No. 657), Law on Political Parties (Law No. 2820), Labor Law (Law No. 4857) and National Education Basic Law (Law No. 1739) Law No.) are laws that recognize the equality of everyone before the law and prohibit all forms of discrimination.

[1] https://www.amnesty.org.tr/public/uploads/files/Rapor/UAO%CC%88%202020-21%20Y%C4%B1ll%C4%B1k%20Rapor%20-%20Tu%CC%88rkc %CC%A7e%20070421.pdf

With the establishment of HREIT in 2016, Turkey has institutionalized its efforts to ensure the right of individuals to be treated equally and to prevent discrimination in the exercise of legally recognized rights. The founding law of HREIT (Law no. 6701), designates “anti-discrimination” as one of the three mandates of the Institution, which has administrative and financial autonomy in addition to a private budget. (Recommendation 148.17)

The Law no. 6701 serves as a comprehensive law against discrimination, prohibiting discrimination on the grounds of sex, race, colour, language, religion, faith, sect, political or other opinion, ethnicity, property, birth, marital status, state of health, disability and age ; while listing forms of discrimination falling under the scope of the law: Segregation or isolation, giving instructions to discriminate against someone and following such instructions, multiple discrimination, direct discrimination, indirect discrimination, mobbing, not providing reasonable accommodations for persons with disabilities, harassment and discrimination based on presumed grounds (a situation in which a person is discriminated because he/she is wrongly presumed to have one of the discrimination grounds mentioned in the present law)

HREIT's founding law (Law No. 6701) defines “anti-discrimination” as one of the three tasks of the Institution, which has administrative and financial autonomy as well as a special budget. Law No. 6701 functions as a comprehensive anti-discrimination law prohibiting discrimination on the basis of sex, race, color, language, religion, belief, sect, political or other opinion, ethnic origin, property, birth, marital status, health condition, disability and age. . ; When listing the forms of discrimination covered by the law: Discrimination or isolation, giving instructions to discriminate against someone and complying with these instructions, multiple discrimination, direct discrimination, indirect discrimination, mobbing, lack of reasonable accommodation for the disabled, harassment and discrimination based on assumed grounds (if a person wrongly a situation in which he is discriminated against because he is presumed to have one of the grounds of discrimination specified in this law).

In the *General Assembly National Report of Turkey*, although it was evaluated that legal regulations and institutional activities related to human rights were positive, it was stated that there were problems in practice. Minorities, Freedom of religion and conscience, Freedom of expression and the media, Right to peaceful assembly and association, Prohibition of torture and ill-treatment, Right to education, Women's rights, Children's rights, Rights of the persons with disabilities, Refugees, asylum Seekers, international protection and human trafficking are the topics that have been evaluated within the scope of human rights.

In both two reports, it is stated that written laws and regulations are egalitarian and have an approach that protects the rights of disadvantaged groups; However, it is criticized that an egalitarian and democratic approach is not displayed in the implementation of laws and

regulations. Problems in practice prevent the fair functioning of the system and cause incompatibilities with international practices regarding human rights, violations of rights and discriminatory approaches.

2.2. Project Related Human Right Risks

According to the "Guiding Principles on Business and Human Rights"[2] document of The Office of the High Commissioner for Human Rights, Project and Project affected area have been assessed in terms of;

- Non-discriminatory manner,
- Risks or challenges of the individuals, groups or populations who are vulnerable or marginalized,
- The different risks that may be faced by children, women and men.

Turkey's characteristics such as being a transit and destination country in international migration movements, especially for the Middle East and Asian countries, its geographical location at the intersection of roads between Asia, the Middle East and Europe, its political borders with many countries, and the long coastline surrounding the country may occur the risks on the human rights.

Specific to the Project, risks related to human rights were evaluated on the basis of interviews and observations made during the fieldwork, and the documents prepared beforehand regarding the Project. The following potential risks to human rights have been identified in the Project impact area and within the scope of Project activities:

- Risks Relating to Human Trafficking
- Forced Labour
- Risks Related to Child Labor
- Risks Related to Gender Equality and Discrimination
- Risks Caused by Land Acquisition

Risks related to human rights, such as human trafficking, forced labor, child labor, and forced prostitution, to which migrant women and children and vulnerable groups may be exposed, were handled within the scope of the Project, within the scope of Human Rights-Related Risks.

[2] https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

2.3. Risks Relating to Human Trafficing

Due to the location of the project, Adana, Mersin, Osmaniye and Gaziantep can be considered as provinces where Syrian and other immigrant populations are densely populated and therefore there are groups at risk of being victims of human trafficking.

2.4. Forced Labour

Forced labor, as a form of human trafficking, refers to the usurpation of personal freedom and coercion to work. Forced labor through confiscation of foreign passports, debt, threats and violence is another form of human trafficking. Forced prostitution among women, abuse and forced labor of children, and forcing men to work in inhumane conditions are common within the scope of this human rights violation.

Within the scope of the Project, measures and control mechanisms will be implemented to prevent the emergence of forced labor in provinces with high risk levels.

2.5. Risks Related to Child Labor

Agriculture is the sector where child labor is most common in Turkey. 30.8% of working children are in agriculture, 23.7% in industry and 45.5% in service sector. 66.0% of working children work in a regular workplace, 30.4% work in the field-garden, 3.0% work in a mobile, non-fixed workplace or market place, and 0.5% work at home.

When the provinces where the project is located are evaluated, it can be stated that the risk is high in Adana, Mersin and Osmaniye provinces due to the intense temporary agricultural work.

Considering the location of the project, it is important to implement mitigation measures.

When the provinces where the project is located are evaluated, it can be stated that the risk is high in Adana, Mersin and Osmaniye provinces due to the intense temporary agricultural work.

Within the scope of the project, the following risks may exist regarding child labor;

- Employing child workers in subcontracted jobs,
- Employment of children in works such as agriculture and commerce carried out within the family,
- Employment of children in productions made in the household on a piece-by-piece basis,
- Including children in the recruitment of unskilled workers living or traveling as nomads,
- Employing children under the age of 18 in hazardous work.

It is important to implement the necessary mitigation measures. Risk management will be ensured with mitigation measures, however, child labor has been evaluated as a risk that must be taken into account and prevented.

2.6. Common Mitigation Measures to be Taken Against Human Rights Risks

The project takes measures against all kinds of human trafficking, prostitution, forced labor, child labor and related activities that support or increase these crimes and implements a zero tolerance policy.

- It will expand the zero tolerance policy within the scope of procurement, supply, sub-activities and services. It will provide training and information on the prevention of child labor for contracted companies that it purchases or employs as subcontractors.
- The project directly monitors activities that may increase child labour, implements sanctions in line with human rights and principles, and reviews business relations.
- No employee or any Project consultant, contractor, sub-contractor, vendor or supplier will be involved in criminal activities, human rights violations. This commitment will be specified in all contracts and its sanctions will be defined.
- If any employee is found to have engaged in such behavior, the Project will impose its own sanctions, including dismissal, in addition to national and international regulations.
- The project will identify mitigation measures to minimize risks, consult and implement measures through open and transparent consultations with local people.
- In this process, necessary arrangements and supports should be provided especially in order to prevent the loss of livelihood and income of land users. For this reason, the determination of the main users of the lands is an important element.
- Effective Use of Grievance Redress Mechanism for these measures is one of the most important tools to prevent human rights violations and to prevent risks through early detection. For the effective use of the grievance mechanism, the GRM Procedure is being revised within the scope of the SEP document. Effective use of GRM measures are defined to improve the functioning of human rights.
    - Assistance will be provided to enable vulnerable groups to access Project GRM.
    - Open, transparent, timely and reliable information and consultations will be proceeded with vulnerable groups, disadvantaged groups and women living in or affected by the project, on GRM and Project impacts/ opportunities.
    - These activities will be detailed in the SEP document.

- Within the scope of the project, cooperation and partnerships will be established with institutions and/or NGOs that are experts in their fields to manage risks related to human rights and gender discrimination. These collaborations will support the management of project risks with consultancy activities that will be beneficial in the management of risks related to human rights, both legally and socially.

2.7. Risks Relating to Gender Equality and Discrimination

Discrimination is a risk that should be constantly monitored and may arise from many reasons. The Project aims to ensure social inclusion and gender equality of vulnerable groups and to eliminate potential risks throughout the life of the Project, in line with national and international objectives.

In order to ensure that the job opportunities and benefits created within the scope of the project are equally beneficial, it will be ensured that the vulnerable groups and women are informed at a sufficient level, primarily the people affected by the project.

2.8. Mitigation Measures

- Announcements of the content of job opportunities and their definitions in job postings will be inclusive and will not include expressions that are indiscriminate, discriminatory, identifying or excluding.
- 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.
- Open, transparent, timely and reliable communication and consultations will be made with vulnerable groups, disadvantaged groups and women affected by the project,
- Meetings will be held and briefings will be made so that all segments can access the grievance mechanism and submit their complaints under equal conditions.
- Vulnerable groups will be provided with necessary support and assistance.
- Transparency, suitability for the job and merit criteria will be applied without exception in the recruitment processes in line with the principles and ethical rules.
- Discrimination behavior or practice arising from any reason such as gender, age, ethnicity, religion, language, race, physical characteristics, disability will be recorded and examined.

3. PROJECT OPPORTUNITIES

It is possible to categorize the Opportunities that will arise within the scope of the Project under the following headings:

- Developing Local Employment Opportunities and Labor Force
- Increasing Women's Employment and Developing Equal Working Conditions

3.1. Local Employment & Procurement

Job opportunities created by the Project in neighborhoods where the population living in rural areas and working in temporary agriculture and construction works is concentrated is considered as an important opportunity. Regarding to this issue, evaluation of the Zeytinli Mukhtar is important in terms of explaining the general situation. In this regard, the village headman of Zeytinli, whose majority of the village population is temporary agricultural and construction workers, has stated that; if workers are recruited from villages for job opportunities opened in unskilled works, many people will not have to go to temporary, precarious jobs in big cities. Therefore, even if the jobs in the Project are temporary, it will be an important source of income for the poor families living in here.

The following improvement actions will be implemented in order to improve the opportunities emerging within the scope of the Project and to develop the benefits of the Project.

3.2. Enhancement actions

Rönesans High-Speed Train Construction Project will improve its activities to increase local employment in the region where it operates.

It will be the primary objective for vulnerable groups and women, especially vulnerable groups affected by the project, to be aware of and access job and procurement opportunities in the project area of influence. Therefore, following enchantment activities will be implemented.

The following actions and measures will be implemented to achieve this goal:

- Job postings will be prepared using an anti-discrimination language, and recruitment processes will be carried out in a transparent and accountable manner.
- Local people and mukhtars affected by the project will be informed about employment opportunities and women will be encouraged to apply for job opportunities.
- Publish vacancies (listing the required qualifications for all categories of employment) within project-affected communities

- Ensure the exchange of information between Contractor and the local population on employment opportunities by visiting the mukhtars in the vicinity of the Project affected area,
- Publish and communicate employment opportunities listing the required qualifications for all categories of employment city-wide, via the related organizations and beyond in region, if the vacancies cannot be filled from local communities,
- Provide such information to the NGOs, organizations or instutitions who are working on the labourforce, local human resorces, vocational education or vulnerable groups,
- Define and ensure that a staff person responds to questions from the local population regarding employment and procurement opportunities,
- Proactively procure goods and services from local businesses and entrepreneurs in affected settlements and members of targeted disadvantaged groups,
- Publicizing procurements and employment opportunities within the targeted geographical area or targeted group, for example at the District and neighborhood offices and via notice boards, print media (newspapers, etc.), recruitment agencies, or job and career fairs,
- In disseminating information on potential service procurement opportunities, take steps to maximize outreach, using all forms of media that may be appropriate.

3.3. Developing and Strengthening the Labour Force

Developing and strengthening the workforce following the creation of local employment is another important objective within the scope of the Project.

On-the-job training will be implemented as one of the most important tools of the local human resources development process, which is one of the objectives of the Project.

The project will improve the qualifications and equipment of the unskilled or semi-skilled workforce who are employed for a short time or periodically, with on-the-job trainings to be given to the local workers and will enable them to gain an advantage in their participation in economic life in the next period.

In this context, on-the-job training will be given under the supervision and training of trainers who are experts in the project construction works.

Employees' skills in using machinery, equipment, tools and equipment will improve, and their experience and skills in their fields will increase.

In this context, it is aimed that the vulnerable groups, women and disadvantaged groups recruited to improve their skills and abilities while working in short-term unskilled jobs and leave the job empowered and equipped when leaving the job.

Rönesans High-Speed Train Construction Project will provide internship and apprenticeship opportunities to improve the skills of local people as a requirement of contributing to the social and economic development goal.

For this purpose, cooperation will be made with Technical and Vocational Education and Training Centers, employment offices or institutions and professional associations to provide apprenticeship or internship opportunities to graduates of technical and vocational subjects, graduates of related colleges and universities or graduate candidates.

4. STAKEHOLDER ENGAGEMENT

Stakeholder Engagement Plan (SEP) of the Mersin-Gaziantep Train Project which has been developed as a part of the ESIA process.

For management of the human rights impacts a healthy, inclusive, trust-based and transparent stakeholder engagement will be implemented.

SEP of the Mersin-Gaziantep Train Project has been developed 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 and provide trustbase communication and relationship with internal stakeholders over the lifetime of the project.

The SEP also includes a grievance redress mechanism for community members and other stakeholders to raise any concerns and problems related to the Project. The Grievance Redress Mechanism Procedure (GRM) procedure, which is one of the most important tools of stakeholder engagement, has also been developed within the scope of the SEP.

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.

The implementation process of the stakeholder engagement plan will also include the GRM which is the main tool of the stakeholder engagement activities. Records, complaints, feedbacks entered in the Grievance Redress Mechanism will also create its own database to evaluate the stakeholder engagement process and to receive the necessary actions.

4.1. Integration of the Grievance Redress Mechanism

The using of the tools and methods identified above in GRM Procedure and SEP implementation process will be supported by capacity building activities and trainings on the tasks and workflow of the Project related experts. Complaints, suggestions, and opinions received through these tools will be evaluated and finalized according to the Grievance Redress Mechanism management process described in this Grievance Redress Mechanism Procedure.

Each written or verbal complaint or suggestion submitted by the Project representatives or experts will be recorded with the contact information of the stakeholder in the main database. All process will be monitored and finalized in this commonly used database, within the workflow of the grievance mechanism.

Feedback and result notification for complaints received through this channel will be made to the relevant stakeholder.

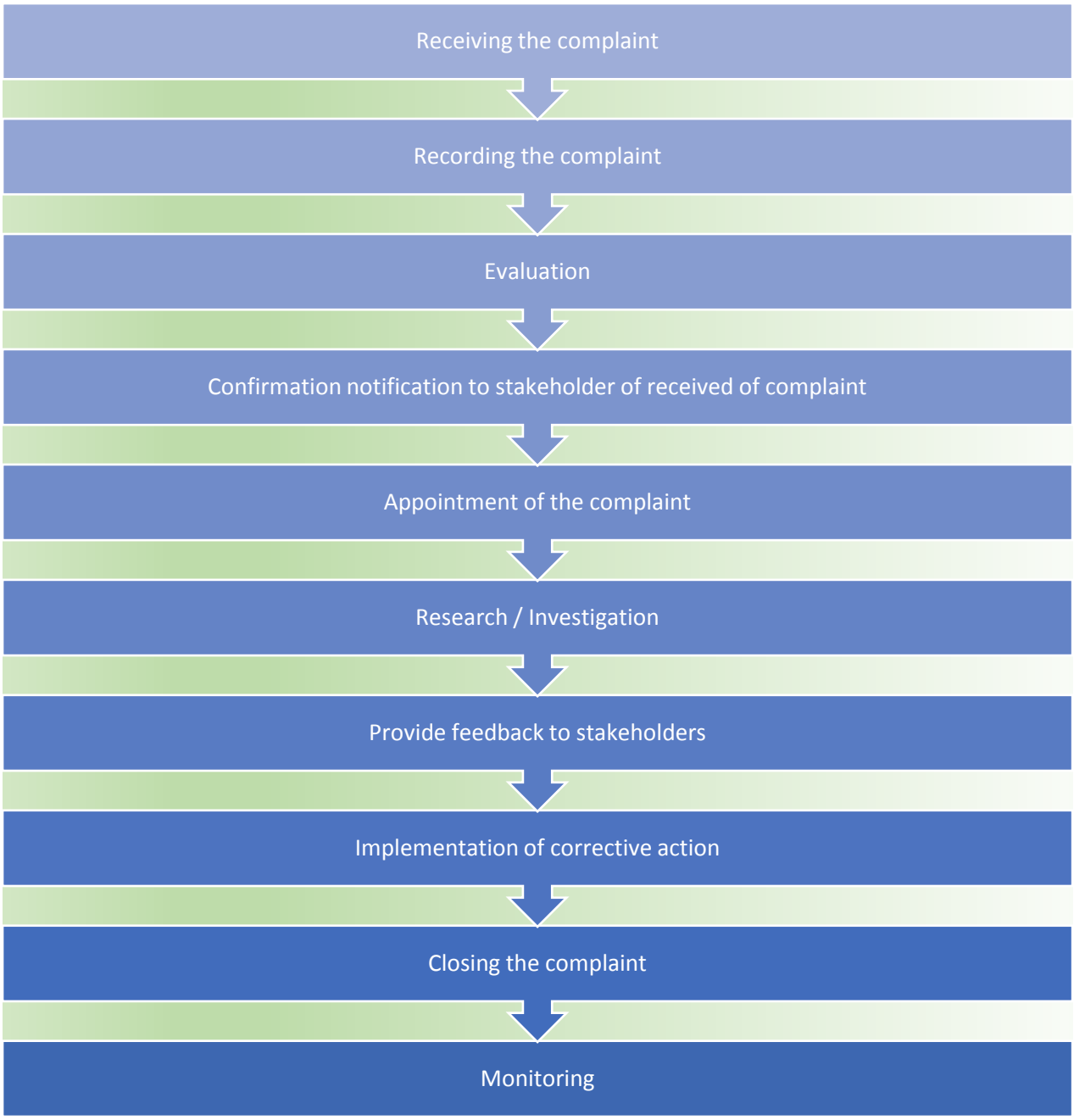
4.2. Internal (Worker) Grievance Management Process

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.

4.3. 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.

The functioning of the grievance redress mechanism is shown in the diagram below.



Receiving and assessment of anonymous complaints: When both external and internal stakeholders experience problems, concerns, or difficulties in providing their contact information, identification information, complaints submitted by stakeholders will be initially evaluated and recorded as anonymous complaints or anonymous suggestions.

Stakeholders can send all their wishes and complaints, without specifying their names, to the wish-complaint boxes placed at specific points for external stakeholders or via Rönesasn telephone hotline.

Grievances are received anonymously and assessed by applying the steps defined in the workflow. Within the scope of the complaint, it will be evaluated through investigation / examination processes and each stage will be recorded in the complaint mechanism system. Third parties will not be informed about complaints that need to be kept confidential.

When the complaint is concluded, although there will be no formal feedback on the solution to be implemented, if it is an issue that needs to be informed by the public and if deemed necessary, it can be announced to the stakeholders through common boards/ public and general communication tools.

5. IMPLEMENTATION PLAN

Following actions will be implemented to support the Project employees, subcontractors and steakeholders on human rights issues.

Table 5-1. Additional HRIA Engagements

Action	Target Group	Schedule
Development of HRIA, Stakeholder Engagement Plan and GRM Procedure	• Employees, workers, sub-contractors of the Project • Stakeholder institutions, government agencies, NGOs working on social and gender issues • Vulnerable groups, disadvantaged groups and women	November 2021
Stakeholder consultation meetings will be held with institutions, government agencies, NGOs working on migrants, women and vulnerable groups	Stakeholder institutions, NGOs, Project affected settlements' mukhtars, Vulnerable groups, disadvantaged groups and women	January-March 2022
Stakeholder engagement visits to the mukhtars to be informed on the HRIS measures of the Project	Stakeholder institutions, NGOs, Project affected settlements' mukhtars, Vulnerable groups, disadvantaged groups and women	January-March 2022
Collaborations and contractions will be established with the institutions to work together during the Project process to fulfill the HRIA targets.	Stakeholder institutions, NGOs, Project affected settlements' mukhtars, Vulnerable groups, disadvantaged groups and women	March-May 2022
Working conditions, contracts and business processes will be regulated in accordance with the HRIA requirements through additions and amendments to the contracts of the sub-contractor's workers and principal agreement of the Sub-contractor,	Subcontractors Workers	Foe all contracts, when needed
Employees of the Project, Sub-contractors will be informed and trained on all HRIA requirements implementation and mitigation measures	Employees, workers, sub-contractors of the Project	At the beginning of new project phases, during new job start-ups
Following toolbox trainings will be provided to the sub-contractor and employees • Gender discrimination, • C-TIP, • Sexual harassment	• Employees, workers, sub-contractors of the Project	At the beginning of new project phases, during new job start-ups
Informative trainings and toolboxes will be provided to workers on child labour,	• Employees, workers, sub-contractors of the Project	At the beginning of new project phases, during new job start-ups
Arrangements will be applied for providing the equal opportunities to all groups, as provide suitable gender-segregated facilities to enable the safe employment of both men and women, e.g. toilet	• Employees, workers, sub-contractors of the Project	For all camp sites

Action	Target Group	Schedule
facilities, changing facilities on all sites and enabling physical access to office accommodation for people with disabilities,		
Open, transparent, timely and reliable information and consultations will be proceeded with vulnerable groups, disadvantaged groups and women living in or affected by the project, as detailed in the SEP document	• Stakeholder institutions, NGOs, Project affected settlements' mukhtars, Vulnerable groups, disadvantaged groups and women	When needed
Awareness-raising will be provided to the local people living in the surrounding settlements on trafficking in person, sexual harassment and child labour to mitigate the potential negative impacts.	• Vulnerable groups, disadvantaged groups and women	May -December 2022
Toolboxes will be given to all Project employees and sub-contractors regarding compliance and communication with the local community living in the environment.	• Project employees, drivers, managers	When needed