MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

STAKEHOLDER ENGAGEMENT PLAN

AUGUST 2023

ANKARA

MERSİN-ADANA-GAZİANTEP HIGH STANDARD RAILWAY PROJECT

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ABBREVIATIONS

- SEP: Stakeholder Engagement Plan
- ESMU: Environmental and Social Management Unit
- ESMP: Environmental and Social Management Plan
- IFC: International Finance Corporation
- ESIA: Environmental and Social Impact Assessment
- NGO: Civil Society Organization
- PEK: People Affected by the Project
- CLO: Public Relations Specialist
- PIU: Project Implementation Unit
- RAP: Resettlement Action Plan

1. INTRODUCTION

Healthy, inclusive, trust-based and transparent stakeholder engagement plays a key role in the successful management of the social and environmental impacts of projects. Therefore, a functional Stakeholder Engagement Plan should be developed and implemented effectively to ensure the participation of all stakeholders who are directly or indirectly affected by the project, ability to influence the Project, and/or who are interested in the project results.

Stakeholder Engagement Plan (SEP) of the Mersin-Adana-Gaziantep High Standard Railway Project as part of the ESIA process.

SEP will be developed to ensure the process of interaction with the external stakeholders in the course of implementation of the Mersin-Adana-Gaziantep High Standard Railway Project in compliance with the requirements of the Turkish national law/regulations and the International Finance Corporation (IFC) Performance Standards on Social and Environmental Sustainability. As described in the IFC Performance Standard 1, the purpose of the SEP is to establish and maintain positive relationships with external stakeholders and provide trustbase communication and relationship with internal stekaheholders over the lifetime of the project.In accordance with tis aim, SEP identifies the Project stakeholders, target groups and the specific engagement activities required for each group, with an eye on the specific engagement and awareness building on environment, social and gender inclusion in accordance with the IFC Performance Standards (PSs),

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-Adana-Gaziantep High Standard Railway Project implementation.

1.1. Scope of the Project

Stakeholder Engagement Plan Stakeholder Engagement Plan has been prepared to define the stakeholder groups, to determine the most appropriate and efficient method and approach for the project's characteristics and needs as a component of the Environmental and Social Management Plan and is in a structure that overlaps with other management plans, together with these plans.

The aims of the SEP;

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

1.2. Objective of the Project

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

The main objectives of the SEP are therefore to:

- Identify all stakeholders that may be directly/indirectly affected from or affect the Project,
- Provide timely, relevant, accessible, and easily understood information to stakeholders in an appropriate non-technical format,
- To ensure that all project affected groups both women and men, the old and young, vulnerable, and disadvantaged groups are included into the meaningful participation throughout the Project lifecycle in the initial stages of the Project,
- Foster strong project community relationships,
- Specify procedures and methodologies for stakeholder consultations,
- Build and maintain relationships between the Project and stakeholders through open dialogue,

- Provide opportunity for all stakeholders to express their opinions and concerns,
- Ensure a technically and culturally appropriate approach to engagement with all stakeholders,
- Establish a grievance mechanism for all stakeholders.

1.3. Activity Information

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

In this context, two (2) new railways will be constructed between Mersin and Adana in addition to the current railway. In following part of the line, current line will be extended with High Standard Railway Line. The detailed explanation of the works to be performed by Rönesans is given in the project description section.

1.4. Project Area and Vicinity

The High Standard Railway Project is between Mersin-Adana-Gaziantep provinces and passes through Mersin-Adana-Osmaniye-Gaziantep (Başpınar). The route proceeds as Mersin-Adana-Toprakkale-Bahçe-Nurdağ-Başpınar, respectively. Route alternatives determined for the Project are specified in the Non-Technical Summary section 6 of the Project Components prepared for the Project.

Table 1-1. Cities and District in the Vicinity throughout the Railway Line

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

1.5. Industrial and Commercial Areas

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

2. LEGAL FRAMEWORK

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

2.1. National Legislation

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

2.2. The Constitution of the Republic of Turkey

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

Article 25: Freedom of Thought and Opinion – Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

Article 26: Freedom of Expression and Dissemination of Thought – Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

Article 56: Health, the Environment and Housing A – Health Services and Conservation of the Environment – Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

Article 63: Conservation of Historical, Cultural and Natural Wealth – The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

Article 74: Right of Petition – Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

CIVIL LAW NO. 4721

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

LAW ON THE RIGHT TO INFORMATION NO. 4982

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

LAW ON THE USE OF RIGHT TO PETITION NO. 4982

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

EXPROPRIATION LAW NO. 2942

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

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

The Regulation entered into law in 2014, being amended in 2016, 2017 and 2019. The Regulation sets out the procedures and principles of EIA in Turkey and the authority of the Ministry of Environment and Urban Planning to determine rule on the status of EIA projects, or delegate this decision to local authorities. The regulation also covers provision on the topics of EIA reports, EIA procedures and processes, monitoring and inspection regimes, and effective EIA and environmental management procedures.

2.3. International Standards

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

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

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

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

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

The following requirements for stakeholder engagement are set out in IFC Performance Standard 1:

“Performance Standard 1 means developing a comprehensive assessment to identify the environmental and social impacts, risks and opportunities of projects, (ii) engage effectively by publicizing project-related information and consulting with them on issues that directly affect

local communities, (iii) the client's environmental and social reveals the importance of managing its performance”1.

- Stakeholder engagement according to IFC standards, ensures the basis for the Project Owner to establish strong, constructive and sensitive relationships with stakeholders.
- The stakeholder engagement process should be initiated at the earliest stage of the Project lifecycle, in land acquisition, economic and physical displacement and should continue throughout the life of the project.
- An effective stakeholder engagement mechanism ensures that affected communities and other relevant people and organizations are fully informed and meaningfully participate in monitoring the process.
- Stakeholder engagement facilitates provide the identification of avoidance, minimization, mitigation and remediation measures that are appropriate and sustainable.

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

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

Along with the above requirements, in the Performance Standard 1 Evaluation and Management of Environmental and Social Risks and Impacts document published in January 2012 by IFC, "Where there are Affected Communities, the client will establish a Grievance Redress Mechanism to receive and facilitate resolution of Affected Communities’ concerns and grievances about the client’s environmental and social performance".

According to IFC standards, the Grievance Redress Mechanism should aim to address concerns urgently, using a culturally appropriate, accessible, understandable and transparent consultation process. The party that raises a concern or complaint should not face any price or sanction. The complaint mechanism should not be an obstacle to resorting to legal or administrative remedies.

[1]https://www.ifc.org/wps/wcm/connect/2ee7f9f1-77a3-4739-a9a4-146aa04395e6/PS1Turkish2012.pdf?MOD=AJPERES&CVID=jIApldX

2.4. Stakeholder Engagement in the Covid-19 Process

Covid-19 has changed the working conditions, working culture and habits all over the world. Stakeholder engagement processes were also affected by this case, and institutions revised their stakeholder engagement processes by taking Covid-19 measures into account.

Stakeholder engagement activities of the Project will be carried out both in accordance with the measures taken nationally and according to the international suggestions and updates.

The IFC published its recommendations on health-safe stakeholder engagement activities in COVID-19 conditions on 15 May 2020 (IFC, 2020). IFC stated that in the COVID-19 process, it is necessary to take measures that will also affect stakeholder engagement methods and forms of relationships.

In the document, it was stated that in the Covid-19 period, companies changed the working environment and the business model. Therefore, new risks and opportunities for stakeholders should be evaluated. In the IFC document, it is also stated that companies should provide information about the changes made in this process, new working environment and business models, strategic goals and management of sustainability issues.

Based on the requirements of these current conditions, while preparing the stakeholder engagement plan of the project and planning the stakeholder processes, IFC's "Disclosure and Transparency Framework During COVID-19" (Covid-19 Process Information and Transparency Framework) and "Interim Advice for IFC Clients On" Safe Stakeholder Engagement In The Context of Covıd-1" (Intermediate Recommendation on Safe Stakeholder Engagement in the Context of Covid-19) documents have been taken as a guide.

In the Covid-19 process, the main elements to be taken into account in order to develop safe and effective stakeholder engagement and complaint management, to maintain the proactive communication process and to provide timely information to communities are explained in the Interim Recommendation on Safe Stakeholder Engagement in the Context of Covid-19. The elements in the document are as follows:

- A clear protocol should be defined for external communications and contact points should be determined according to the company's current protocol and communication emergency planning.
- Any stakeholder engagement activity should comply with national and local regulations, as well as advice and guidance from national and international health authorities, and health-related recommendations and guidelines should be followed closely.
- Given the dynamic nature of the COVID-19 situation, companies must be able to adapt their approaches to cope with new or changing needs.

- Critical environmental and social risks that may be exacerbated by the COVID 19 outbreak need to be identified and mitigation measures developed to address these risks need to be communicated to stakeholders.
- Identify critical stakeholder engagement activities planned or ongoing before COVID-19. Decisions to continue planned activities or initiate new ones should be based on a full understanding of potential risks.
- Multiple alternative channels / tools should be designed or adapted for access to the Grievance Redress Mechanism and external communication, taking into account the local context (urban or rural), current situation and different project activities. Examples include radio announcements, cell phones, bulletin boards, and methods that can be used to provide certain information and disseminate the various communication channels available.
- Established national / regional / local platforms that are being used as communication forums and tools during the COVID-19 'process can be used.
- Identify existing channels and social structures (eg community leaders, community-based organizations and women's co-operatives) in communities with limited connectivity and access to technology, or affected groups, or where there are literacy issues.
- When evaluating the options available for stakeholder engagement in the COVID-19 process, methods should also be developed to ensure the participation of vulnerable and/or marginalized groups. For example, where women, persons with disabilities have limited access, a social support approach that supports access and participation should be designed.
- An understanding of operational difficulties in communicating key messages such as connectivity, information technology literacy, distance, breach of privacy, fear of retaliation, trust issues, surveillance concerns, and reluctance to rely on proposed alternatives is required.
- Stakeholder engagement approaches should be reviewed and adjusted to reflect the applicable national and local regulations regarding changing conditions from COVID-19. Approaches should be adapted to better meet the objectives of the project, engagement process, and complaints management, and flexibility should be maintained to adapt to these changes.

2.5. Precautions to be Taken Against the COVID-19 Pandemic

The COVID-19 pandemic is a serious and unusual process that requires measures to be taken on a Project basis, as in many areas. Within the scope of the project, the measures determined by the World Health Organization (WHO) will be taken as a basis for the COVID-19 pandemic process. The principles determined by WHO were published on September 6, 2021 and the

COVID-19 Pandemic Management and Working Guide prepared by the Scientific Advisory Board of the Ministry of Health in Turkey. The most important items among the measures to be taken are listed below:

- Disposable face masks should be given to the personnel by paying attention to personal and environmental cleanliness.
- Persons showing signs of Covid-19 in the workplace should be identified and isolated.
- Those who have contact with people with the disease should be monitored and close contacts should be managed according to the COVID-19 guidelines.
- When an employee with fever, cough or respiratory distress is detected, the workplace health unit and the provincial/district health directorate should be contacted.
- Informational posters and brochures about COVID-19 should be hung in collective places.
- Common areas should be ventilated frequently.
- It should be ensured that disinfectant is placed in various areas and at every point that workers can reach in many places in the work areas and railway stations for passengers.
- All personnel should be trained within the scope of Covid-19.
- The publications of the Ministry of Health on Covid-19 should be followed.
- During the construction and operation period, 'Guidance to Covid-19 Outbreak Management and Working' should be followed.

Considering the Covid 19 precautions clearly stated above, the Health, Safety and Security Plan (including occupational health and safety (OHS) will be prepared by the contractor before the start of the construction process and the relevant plan will be implemented during the construction phase.

3. ROLES AND RESPONSIBILITIES

In addition to defining the Key Stakeholders, the roles and responsibilities of the main units and/or the persons who assigned as responsible for the implementation of the SEP and the Grievance Redress Mechanism are defined under this heading.

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

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

In order to fulfill these roles and responsibilities, an Environmental and Social Management Unit (ESMU) is recommended to assign under Rönesans Project Management. ESMU can be constituted as a new unit for the management of the social and environmental issues of the Project or eligible employees under the current organization structure of the Rönesans can be charged for carrying out the defined tasks in the ESMP and SEP.

ESMU will report to the Project Manager and will carry out its activities under the close supervision of the Project Manager.

Roles and responsibilities and the structure of the ESMU are presented below.

Table 3-1. Roles and Responsibilities

ROLE	RESPONSIBILITIES
Project Manager	• To provide the necessary resources for the approval and implementation of this Plan. • To follow up the performance of the Plan by making the necessary assignments.
Environment and Social Complaince Manager	• To ensure the compliance of the project with the requirements specified in the Plan • Coordination of the project's activities related to the Plan, • To monitor the Plan in order to develop and improve and to make relevant audits and revisions. • To provide information to the General Manager/Factory Manager regarding the performance of the plan • To ensure the implementation of the Grievance Redress Mechanism according to the Procedure • To report to the general manager by monitoring the GRM

ROLE	RESPONSIBILITIES
Social Compliance Chief	• To plan stakeholder engagement activities and ensure that they are implemented on schedule. • Monitor subcontractors' compliance and audit their implementation performance. • Identify deficiencies of subcontractors in the implementation of SEP. • Provide the necessary technical support to take relevant measures/regulations. • Monitor the Plan and inform the Environmental and Social Compliance Manager about identified deficiencies and suggestions for improvement in order to develop and improve this Plan. • Evaluate the grievances identified in the SEP in the Grievance Mechanism, plan corrective actions, consult with the stakeholder and close the grievance. • Monitor corrective actions and follow the grievance closure process
Public Relations and Communication Officer(s)- CLO	• To conduct the field studies. • To inform the Social Compliance Manager by recording the complaints and notifications received from the stakeholders in the field in the GRM. • Communication and coordination with all stakeholders within the framework of the plan • Coordination of the communication with local people in emergencies, • To register the complaints received from the Project hotline and to inform the social expert • To carry out the review and evaluation of the actions taken in the Grievance Redress Mechanism, as defined in the SMP, to plan corrective actions, to consult with the stakeholder and to close the complaint •
	•
Health and Safety Specialist	• To ensure that the activities carried out within the facility are carried out in accordance with the Plan • Following up on OHS-related complaints and carrying out necessary studies, planning corrective actions on OHS issues. • To carry out the review and assessment of the actions taken in the GRM, as defined in the SEP, to plan corrective actions, to consult with the stakeholder and to close the complaint

4. STAKEHOLDER ENGAGEMENT

4.1. Approach

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

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

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

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

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

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

Within the scope of the project, an effective process will be realized through the disclosure and development of the ESIA, obtaining feedback from Stakeholders and raising concerns. The ESIA will be updated and finalized based on feedback from stakeholders. Sharing Project-related information through the Stakeholder Engagement Plan helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project.

4.2. Identification of Stakeholders

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

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

Stakeholder analysis is the first step of the stakeholder engagement process and it should be considered as the basis of stakeholder engagement management. Stakeholder identification is not only a work done at the beginning of the SEP process. When reaching to different phases of the Project or when the Project activities change, it will be necessary to include new stakeholders affected by the project.

This approach reveals that stakeholder identification and updating the studies will take place in all stages of SEP. In this sense, defining the stakeholders is not considered as a completed stage at the beginning of the Stakeholder Engagement Plan, but as a process that is followed up and monitored throughout the Project lifecycle. A stakeholder-oriented approach is adopted in all stages of the pre-construction, construction, and operation maintenance phases of the Project. In addition, while the Stakeholder Engagement Plan is implemented, monitoring and evaluation activities will play a very important role in the process of updating stakeholders and tools.

The identified stakeholders were reviewed by Project experts, managers, consultants and key stakeholders. At this stage, the geographical impact area of the project has been determined according to the project phases. At this stage, not only the construction area of the Project but also,

- Nearby facilities,
- Other activities ongoing around the project area,
- Transport routes,
- Areas that may be affected by potential cumulative impacts,
- Project results impact area,
- Vicinity settlements,

Area of influence determination methodology used in the Project ESIA, DEIA documents have been assessed and stakeholder engagement activities have been carried out to define the geographical impact area are considered to define the Project affected area.

A comprehensive list of stakeholders has been prepared for the Mersin-Adana-Gaziantep High Standart Railway Project. Stakeholders have been identified as the following diagram;

- International organizations,
- National organizations,
- National / regional governmental bodies,
- Local governments or authorities,
- People/ community living in the vicinity of the Project area,
- Farm, mine, business, workplace, industrial or commercial areas in the surrounding area
- National or local NGOs,
- Professional chambers, trade, industry, agriculture chambers, cooperatives, sectoral organizations, labor associations or unions,
- Local and/or national media,
- Vulnerable groups: the elderly, the disabled, female-headed households, poor households and/or persons, illiterate persons, ethnic minorities, immigrants, refugees, etc.
- Suppliers, service providers,
- Sub-contractors,
- Project employees.

The potential stakeholders should be categorized according to the interaction of the stakeholder with the Project and its related activities, and the level of the interaction of the stakeholder. The interaction of the stakeholder with the Project could be positive, negative or neutral[2]. Besides, the interaction level could be low, medium or high. As a result, interaction of a stakeholder with Project can be treated as multifaceted. (See. Figure 4-1).

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

Figure 4-1. Identification of Stakeholder According to Interaction Condition

[2] Positive interaction: supporting the Project outcome, Neutral interaction: neither supportive nor resistant of the Project, Negative interaction: resistant outlook on the project and its activities

Table 4-1. Expected Interaction Levels by Stakeholders

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

5. STAKEHOLDERS

5.1. External Stakeholders

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

Local Communities

Local communities directly affected by the Project were identified and expanded during the expropriation data and ESIA field studies.

The visits made within the scope of ESIA field studies led to the identification of other affected settlements in addition to the expropriation data. These settlements are shown in the table below.

As part of the ESIA, SEP and additional ESIA field studies, the neighborhoods on both sides of the high-speed rail line in Mersin-Tarsus-Adana, Adana-Ceyhan, Toprakkale-Bahçe and Başpınar were consulted.

During the ESIA study, 19 headmen of the affected settlements were interviewed.

During the ESIA additional study, 44 villages of the affected settlements were visited, and the headmen and PAPs were interviewed.

Table 5-1. Local Communities Around the Project Area

PROVINCE	DISTRICT	NEIGHBORHOOD	ESIA MUKHTAR INTERVİEWS	ESIA ADDENDUM SITE VISIT
MERSİN	AKDENİZ	NUSRATİYE		
MERSİN	AKDENİZ	BEKİRDE		
MERSİN	AKDENİZ	YALINAYAK		
MERSİN	AKDENİZ	KARACAİLYAS**		
MERSİN	AKDENİZ	KARACAİLYAS EMEK**		
MERSİN	AKDENİZ	KÜRKÇÜ		
MERSİN	AKDENİZ	YAKA		
MERSİN	AKDENİZ	TEKKE		
MERSİN	AKDENİZ	SARIİBRAHİMLİ		41
MERSİN	AKDENİZ	YENİ		44
MERSİN	AKDENİZ	EVCİ		
MERSİN	AKDENİZ	NACARLI		1
MERSİN	AKDENİZ	ÖZGÜRLÜK		2
MERSİN	AKDENİZ	GAZİ		43
MERSİN	TARSUS	MİTHATPAŞA		3
MERSİN	TARSUS	ŞEHİTİSAK		39

PROVINCE	DISTRICT	NEIGHBORHOOD	ESIA MUKHTAR INTERVİEWS	ESIA ADDENDUM SITE VISIT
MERSİN	TARSUS	YEŞİLYURT		4
MERSİN	TARSUS	ZORBAZHARK (new name: FATİH)		
MERSİN	TARSUS	KEMALPAŞA		
MERSİN	TARSUS	YUNUSOĞLU		
MERSİN	TARSUS	KONAKLAR		
MERSİN	TARSUS	TEKELİÖREN		
MERSİN	TARSUS	KANBERHÜYÜĞÜ		
MERSİN	TARSUS	TEKFUR (new name: ESENLER)		
MERSİN	TARSUS	YENİCE ATALAR-CONSTRUCTION SITE-		5
MERSİN	TARSUS	ÖĞRETMENLER		6
MERSİN	TARSUS	ARIKLI		7
ADANA	SEYHAN	ZEYTİNLİ (DIVIDED)		42
ADANA	SEYHAN	BÜYÜK DİKİLİ		8
ADANA	SEYHAN	MEVKİ		9
ADANA	SEYHAN	GÜNYURDU (ATGİRMEZ)		10
ADANA	SEYHAN	SARI HAMZALI (A DIVIDED NEIGHBOURHOOD)		
ADANA	SEYHAN	ZİNCİRLİ BAĞLAR		
ADANA	SEYHAN	ŞAKİRPAŞA		11
ADANA	SEYHAN	CEMAL PAŞA		12
ADANA	SEYHAN	BAHÇELİEVLER		13
ADANA	SEYHAN	DÖŞEME		14
ADANA	SEYHAN	İSTİKLAL		
ADANA	SEYHAN	DEMETEVLER (HAS BEEN DIVIDED from ŞAKİRPAŞA)		15
ADANA	SEYHAN	NARLICA		40
ADANA	SARIÇAM	İNCİRLİK (new name: YENİMAHALLE)		
ADANA	SARIÇAM	YÜREKLİ		
ADANA	SARIÇAM	MÜMİNLİ (address of the parcels is YÜREKLİ)*		
ADANA	SARIÇAM	DAĞCI		
ADANA	SARIÇAM	SULUCA		16
ADANA	SARIÇAM	MİSİS (new name: YAKAPINAR) 1		17
ADANA	YÜREĞİR	MİSİS (new name: YAKAPINAR) 2		18
ADANA	CEYHAN	ÇAKALDERE	1	19
ADANA	CEYHAN	ALTIKARA		
ADANA	CEYHAN	ÇOKÇAPINAR	5	
ADANA	CEYHAN	SİRKELİ		20
ADANA	CEYHAN	SİRKELİ KALKER OCAĞI		21
ADANA	CEYHAN	TOKTAMIŞ	3	22
ADANA	CEYHAN	TÜRLÜBAŞ		
ADANA	CEYHAN	GAZİOSMANPAŞA		
ADANA	CEYHAN	MİTHATPAŞA		
ADANA	CEYHAN	MURADİYE		23

PROVINCE	DISTRICT	NEIGHBORHOOD	ESIA MUKHTAR INTERVİEWS	ESIA ADDENDUM SITE VISIT
ADANA	CEYHAN	HÜRRİYET		24
ADANA	CEYHAN	HAMDİLLİ		
ADANA	CEYHAN	İMRAN		
ADANA	CEYHAN	KUZUCAK	2	
ADANA	CEYHAN	AZİZLİ		
ADANA	CEYHAN	RİFATİYE (new name: MUSTAFABEYLİ)		25
ADANA	CEYHAN	KÜÇÜKBURHANİYE	4	
ADANA	CEYHAN	TATARLI		26
ADANA	CEYHAN	TATARLI BAZALT OCAĞI		27
ADANA	CEYHAN	BÜYÜKMANGIT DÖKÜM SAHASI		28
OSMANİYE	TOPRAKKALE	MAYMUNSUYU (new name: SAZLIK)		
OSMANİYE	TOPRAKKALE	SAYHÜYÜĞÜ		
OSMANİYE	TOPRAKKALE	DAĞISTAN		
OSMANİYE	TOPRAKKALE	KARATAŞ	13	
OSMANİYE	TOPRAKKALE	KUMARLI		
OSMANİYE	TOPRAKKALE	KIŞLA	14	
OSMANİYE	MERKEZ	AKYAR		
OSMANİYE	MERKEZ	YAVERPAŞA/YEŞİLYURT		41
OSMANİYE	MERKEZ	YAVERİYE		
OSMANİYE	MERKEZ	RAUFBEY		
OSMANİYE	MERKEZ	ALİBEYLİ		
OSMANİYE	MERKEZ	ESENEVLER (address of the parcels is ALİBEYLİ)*		
OSMANİYE	MERKEZ	YENİMAHALLE		29
OSMANİYE	MERKEZ	RIZAİYE		
OSMANİYE	MERKEZ	ASLANİYE		30
OSMANİYE	MERKEZ	DERVİŞİYE		31
OSMANİYE	MERKEZ	TEHÇİ		32
OSMANİYE	MERKEZ	ŞEKERDERE		
OSMANİYE	DÜZİÇİ	YAZLAMAZLI	12	
OSMANİYE	DÜZİÇİ	ELLEK-PEÇENEK		
OSMANİYE	DÜZİÇİ	ELLEK-ŞEHİT ALİ GÖKÇE		
OSMANİYE	DÜZİÇİ	ÜZÜMLÜ		
OSMANİYE	DÜZİÇİ	ÇİFTLİK		
OSMANİYE	DÜZİÇİ	ÇAMİÇİ	9	
OSMANİYE	DÜZİÇİ	KARACAÖREN		
OSMANİYE	DÜZİÇİ	YARBAŞI		
OSMANİYE	DÜZİÇİ	AKÇAKOYUNLU	10	33
OSMANİYE	DÜZİÇİ	BOSTANLAR	11	
OSMANİYE	BAHÇE	BURGAÇLI	8	
OSMANİYE	BAHÇE	ARIKLIKAŞ		
OSMANİYE	BAHÇE	NOHUT KÖYĞ NOHUTTEPE KÖYÜ VE TAŞ OCAĞI	7	34

PROVINCE	DISTRICT	NEIGHBORHOOD	ESIA MUKHTAR INTERVİEWS	ESIA ADDENDUM SITE VISIT
OSMANİYE	BAHÇE	ÇAMLICA		
OSMANİYE	BAHÇE	CUMHURİYET		
OSMANİYE	BAHÇE	İSLAM		
OSMANİYE	BAHÇE	ASLANLI		
OSMANİYE	BAHÇE	AYRANİKİZYENİHARMAN (new name: AŞAĞI ARICAKLI)		
OSMANİYE	BAHÇE	ARICAKLI		
OSMANİYE	BAHÇE	KIZLAÇ		
OSMANİYE	BAHÇE	KAMAN		
OSMANİYE	BAHÇE	SAYRANLI	6	
GAZİANTEP	NURDAĞ	OLUCAK		
GAZİANTEP	NURDAĞ	YENİ		
GAZİANTEP	NURDAĞ	KURUDERE		
GAZİANTEP	NURDAĞ	ASLANLI	15	
GAZİANTEP	NURDAĞ	ÇAKMAK		
GAZİANTEP	NURDAĞ	İÇERİSU (address of the parcels is ÇAKMAK)*		
GAZİANTEP	NURDAĞ	KÖMÜRLER		
GAZİANTEP	NURDAĞ	HİSAR		
GAZİANTEP	NURDAĞ	ŞATIRHÖYÜK	17	
GAZİANTEP	NURDAĞ	SAKÇA GÖZE	16	
GAZİANTEP	ŞEHİTKAMİL	ATALAR		
GAZİANTEP	ŞEHİTKAMİL	BAYATLI		
GAZİANTEP	ŞEHİTKAMİL	SARILAR		
GAZİANTEP	ŞEHİTKAMİL	ESKİŞARKAYA		
GAZİANTEP	ŞEHİTKAMİL	YENİ ŞARKAYA		
GAZİANTEP	ŞEHİTKAMİL	CERİTYENİYAPAN		
GAZİANTEP	ŞEHİTKAMİL	ÜÇGÖZE		35
GAZİANTEP	ŞEHİTKAMİL	AĞAÇLI BOYNO		
GAZİANTEP	ŞEHİTKAMİL	YEŞİLCE		36
GAZİANTEP	ŞEHİTKAMİL	AKTOPRAK		
GAZİANTEP	ŞEHİTKAMİL	NESİMİ (address of the parcels is AKTOPRAK)*		
GAZİANTEP	ŞEHİTKAMİL	BOYNO	19	37
KAHRAMANMARAŞ	PAZARCIK	EVRİ PINARBAŞI**		38
KAHRAMANMARAŞ	PAZARCIK	EVRİ TAŞBİÇME**		

Public Institutions and Organizations: The classification and definition of the public institutions and organization stakeholders has been determined according to the approach and steps described above. Stakeholders are given in the table below.

Table 5-2. Publiv Institutions and Organizations

Public Administrations at National Level	Ministry of Transportation
	Ministry of Energy and Natural Resources
	Turkish Electricity Transmission Corporation
	Electricity Generation Company
	Ministry of Environmental and Urbanization
	Ministry of Industrial and Technology
	Ministry of Agriculture and Forestry
	Ministry of Treasury and Finance
Public Administrations at Province Level	Mersin/Adana/Osmaniye/Gaziantep Governorship
	Mersin/Adana/Osmaniye/Gaziantep Governorship Provincial Planning and Coordinate Directorate
	Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Environmental and Urbanization
	Mersin/Adana/Osmaniye/Gaziantep Provincial Disaster and Emergency Directorate
	Mersin/Adana/Osmaniye/Gaziantep Forest Operation Directorate
	Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Agriculture and Forestry
	Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Industry and Technology
	Mersin/Adana/Osmaniye/Gaziantep Provincial Directorate of Trade
	State Hydraulic Works 6th and 20th Regional Directorate
	5th Regional Directorate of Highways
	Mersin/Adana/Osmaniye/Gaziantep Municipality
	Osmaniye Special Provincial Administration
	Çukurova Development Agency
	Eastern Mediterranean Development Agency
	İpekyolu Development Agency
Regional Official Bodies	Akdeniz/Tarsus/Toroslar/Seyhan/Yüreğir/Sarıçam/Ceyhan/Toprakkale/Center/Düziçi/Bahçe/ Nurdağ/Pazarcık District Governorship
	Police Department of Akdeniz/Tarsus/Toroslar-Mersin, Ceyhan/Yüreğir/Sarıçam/Ceyhan-Adana, Toprakkale/Center/Düziçi/Bahçe-Osmaniye, Nurdağ/Pazarcık-Gaziantep
	Military of Akdeniz/Tarsus/Toroslar/Seyhan/Yüreğir/Sarıçam/Ceyhan/Toprakkale/ Center/Düziçi/Bahçe/Nurdağ/Pazarcık
Mukhtars	* Local Communities Around the Project Area
Non-Governmental Organizations at National Level	Worldwide Fund for Nature (WWF)
	The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA)
	Institution of Nature
	Miners Association of Turkey
	Association of Historical Towns
	The Foundation for the Promotion and Protection of the Environment and Cultural Heritage (ÇEKÜL)
	Greenpeace
Academicals Institutions	Mersin, Toros and Çağ Universities (Mersin)
	Çukurova, Kanuni University and Adana University of Science and Technology (Adana)
	Osmaniye Korkut Ata University Faculty of Science and Letters
	Gaziantep, Hasan Kalyoncu and Sanko Universities (Gaziantep)

5.2. Internal Stakeholders

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

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

The estimated employment figures for the project employees who are accepted as stakeholders within the scope of the project are presented in Table 5-3.

Table 5-3. Estimated Number of Project Personnel

Number of Employees	Months																
	Unit	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**
Indirect	Personel/ Month	138	158	184	205	225	274	299	316	323	326	327	330	331	332	333	332	334
	Unit	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34
	Personel/ Month	334	332	329	325	266	262	261	236	205	203	195	129	127	117	105	73	48
Direct	Unit	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**
	Personel/ Month	319	912	1368	2015	22005	2294	2352	2428	2819	2933	2750	2860	2873	3053	3408	3399	3874
	Unit	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34
	Personel/ Month	3902	3959	4019	4015	3712	3709	3253	2647	2573	2224	1939	2037	1652	914	791	378	144
Total	Unit	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**
	Personel/ Month	457	1070	1552	2220	2430	2568	2651	2744	3142	3259	3077	3190	3204	3385	3741	3731	4208
	Unit	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34
	Personel/ Month	4236	4291	4348	4340	3978	3971	3514	2883	2778	2427	2134	2166	1779	1031	896	451	192

Stakeholder identification of the Project aim to ensure that all project affected groups both women and men, vulnerable and disadvantaged groups, diverse groups, all organizations and institutions interested in the Project results are included into the meaningful participation throughout the Project lifecycle according to the gender and social inclusion objectives. During the stakeholder defining process a wide approach covering all stakeholders related to the Project will also allow the Project to be evaluated and managed properly in all aspects.

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

5.3. Key Stakeholders

Key stakeholders are significantly affected by the project and have a direct and significant impact on the project. Key Stakeholders can consist of both internal and external stakeholders. Identifying key stakeholders is one of the important stages in the stakeholder analysis process. It is important to clearly identify key stakeholders for the success of the social, environmental management and stakeholder engagement process.

During the consultations and/or information meetings with the key stakeholders, the issues, concerns and questions related to the Project, as well as the recording, feedback and consultation activities will be carried out. The diagram below shows the key stakeholders of the Project.

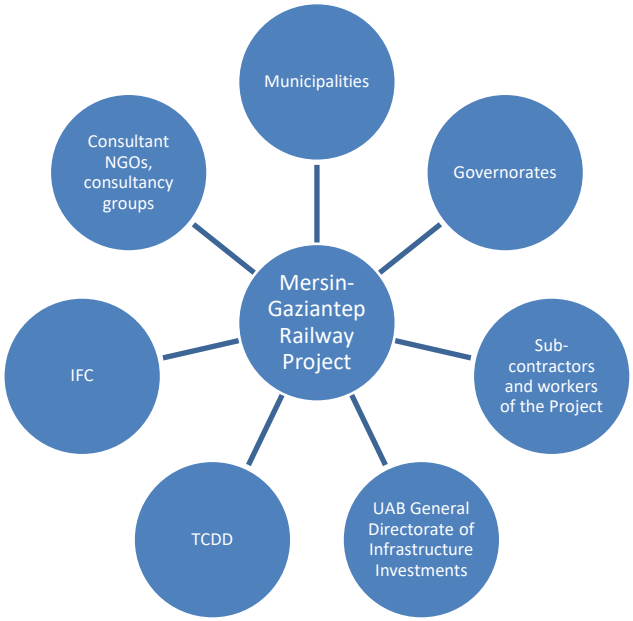


Figure 5-1. Key Stakeholders of the Project

6. IDENTIFICATION OF COMMUNICATION AND INFORMING CHANNELS

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

6.1. Tools and Methods for Stakeholder Engagement

The methods and means of stakeholder engagement for the project are described below. The methods and tools have been defined suitable for the restrictions and measures in the Covid-19 process. The methods and tools that require face-to-face contact are listed to use when the new normalization process is started in the future and when the conditions are appropriate.

The tools identified below will be used for both internal and external grievance redress mechanism. Communication tools and complaint-receiving methods have been diversified so that all stakeholders can easily convey their complaints.

Project Website: The project website will be one of the tools that are active in the stakeholder engagement process during the operational period. It is used especially for making general information, publishing announcements, sharing documents or reports about the project.

E-mail addressed to external stakeholders: Stakeholders can be reached via e-mail by the Project authorized persons on the conditions or issues that require direct information, to be invited to a consultation or interview, or where feedback or information is requested.

Notification of Requests of Employees via e-mail address and website: In order to provide feedback to all employees, the web communication procedure to be developed as a part / tool of the website to be established. The relevant person's e-mail address will be notified to the employees. The feedback coming to these areas will be recorded in the Grievance Redress Mechanism and the process will be operated.

Project Hotline: A telephone line will be defined so that the project stakeholders can reach the Project and convey their complaints, opinions and suggestions. This phone number is especially planned to ensure more active participation of stakeholders who have problems in accessing the internet in the participation process. The phone number will be posted on stakeholder institutions such as provincial directorates, municipalities, the mukhtars of the affected surrounding settlements, and public spaces shared by them.

Official accounts of the project: Announcement / information will be made when necessary during the operation phase of the Project with social media accounts that are becoming widespread during the Covid-19 process.

Online meetings: In the Covid-19 process, consultation and information meetings will be held especially with Key Stakeholders using online meeting tools.

Grievance Redress Mechanism: The GRM is an important stakeholder engagement management tool and method to be used throughout the project, which will include the operation of the process where the notifications, feedback, information and complaints of the stakeholders will be kept. The complaints will be evaluated and monitored, and the results will be consulted to the stakeholders with feedback.

It is planned to use the following tools and methods simultaneously to ensure stakeholder participation of disadvantaged groups, illiterate groups, disabled people and refugee groups with language problems, who do not have access to the Internet, smartphones, social media or e-mail.

Letter / post: Project brochures, advertisements, reports or announcements can be sent via cargo or letter when necessary so that disadvantaged stakeholder groups or individuals who do not have access to the Internet, smartphones, social media or e-mail can access Project information and become part of the Stakeholder engagement process effectively.

Including general information on billboards in public places or public areas: It will be ensured that the announcements and information posters of the communication channels related to the Project will be posted on the boards in common public areas in the surrounding settlements, mukhtars, municipalities, provincial directorates, stakeholder professional chambers.

Poster / Brochures / flyers: Brochures / flyers with communication channels, announcements and information about the Project will be left in common public areas in surrounding settlements.

Publishing announcements / advertisements in the local press: Announcements and announcements will be made in the written and visual media at the stages and situations required by the Project.

Project grievance boxes for external stakeholders: Complaint boxes, including simple-to-use forms where stakeholders can convey their complaints, suggestions and opinions, will be placed at points accessible to particularly disadvantaged stakeholder groups and vulnerable groups affected by the Project.

Survey form / feedback forms: The questionnaire and feedback forms will be available online on the project website, shared as a link in social media accounts or e-mail environment, and they will be available in printed form at the points where the complaint boxes are located at

stakeholder institutions. It will be prepared / updated regarding the subjects to be collected and to receive feedback within the scope of the phase or activities of the Project...

Stakeholder visits: In the Covid-19 period, it was suggested that stakeholder visits should not be made unless absolutely necessary. It will be planned as required by social distance and hygiene rules in cases where project materials need to be delivered in printed form or when direct meeting with headmen is important for stakeholder engagement.

In-depth Interviews: In-depth interviews will mainly be used as a method of meeting with stakeholders in monitoring processes. However, instead of face-to-face in-depth interviews, in-depth interviews can also be conducted online via online tools in order to reduce the risk in the Covid-19 process.

Consultation meetings: Consultation meetings will be held when needed during the project process. Consultation meetings will be held when needed on issues or periods that require consultation with stakeholders by the Project and will be held in places that will facilitate stakeholder participation to ensure wide participation.

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

Table 6-1. Identification of Communication and Informing Channels

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

7. PRELIMINARY WORKS

7.1. Public Participation Meetings

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

Table 7-1. Completed PPMs

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

7.2. Findings and Results of the Stakeholder Interviews

7.1.1 Consultation with Institutions

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

Table 7-2. Distribution of Institution Interviews Results by Province

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

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

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

Table 7-3. Interviews with the Institutions and the Interview Results

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
1	Chambers, Unions and Development Agencies	Mersin	Akdeniz	Mersin Chamber of Commerce and Industry	Manager of the Projects	• There is a need to connection to the airport	Positive	Medium	A2
2	Municipalities	Mersin	Akdeniz	Mersin Metropolitan Municipality Transportation Department	Transportation Engineer	• Local governments and the Ministry of Transportation should work in a coordination manner. The planned project needs to be integrated into the Transport Master Plan.	Positive	High	A1
3	Governorates	Mersin	Akdeniz	Mersin Governorate	Deputy Governor	• A coordination meeting should be held on a provincial basis, with representatives of all public institutions.	Positive	High	A1
4	Associations and NGOs	Mersin	Tarsus	Tarsus Branch of Turkish Disabled Association	Chairman of the Association	• Disabled people, like everyone else, should be able to benefit from the project. For example, elevators for disabled people can be made.	Negative	Medium	C2
5	Associations and NGOs	Mersin	Tarsus	Tarsus Branch of the Autism Association	Chairman of the Association	• Problems such as traffic congestion, narrowing of roads, parking problems may increase.	Negative	High	C1
6	Associations and NGOs	Mersin	Tarsus	Tarsus Visually Impaired Association	Vice President	• Accessibility issues for the visually impaired should be resolved. For example, an audible alarm / signalization system can be installed in train traffic system.	Negative	High	C1
7	Municipalities	Mersin	Tarsus	Tarsus Municipality	Mayor and Deputy Mayor	• In order for the Project to be useful, it should go underground. Going above ground increases the cost of the project a lot. • The Project's location can changes the future of the city. • There is a third-degree site area in the city center. • The city center of Tarsus is a very busy area from a logistical point of view.	Negative	High	C1
8	Public Institutions / Public Services Providers	Mersin	Akdeniz	TCDD Gar Directorate	Deputy Manager	• The light rail system problem also needs to be solved.	Positive	Medium	A2
9	Local Media	Mersin	Akdeniz	Güney Newspaper	Editor	• Transportation traffic and traffic for tourism use the same route. There is no alternative transportation on the east-southeast route. New projects will provide an alternative. • In the region, there is an inequality of opportunity in education. Support for education can be provided for rural and low-income settlements.	Positive	Medium	A2
10	Public Institutions / Public Services Providers	Mersin	Akdeniz	Mersin Provincial Directorate of Environment and Urbanisation, Branch of Zoning Planning	Manager	• When establishing a transport system, aviation, marine and land transport must be integrated. Problems can arise when there is a disconnect.	Positive	Medium	A2
11	Public Institutions / Public Services Providers	Mersin	Akdeniz	Directorate of TCDD Mersin Port Authority	Deputy Manager	• Access of the Project to Taşucu Port reduces road traffic density. The port's capacity can increase. Because the port's stockpiling site will be inadequate in the future. Transporting cargo by train can reduce the port's density.	Positive	Medium	A2

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
12	Municipalities	Adana	Seyhan	Adana Metropolitan Municipality Head of Projects Department	Head of Department	• Underpasses and overpasses at junction points need to be well planned. • It would make sense if the railway route extended to Ankara.	Positive	Medium	A2
13	Chambers, Unions and Development Agencies	Adana	Seyhan	Çukurova Development Agency, Investment Support Office	Expert and Coordinator	• A participation meeting should be held with all stakeholders. • Information meetings and workshops should be organized.	Positive	Medium	A2
14	Municipalities	Adana	Seyhan	Seyhan District Municipality	Deputy Mayor	• Investments in Adana have shifted to surrounding provinces such as Osmaniye and Gaziantep. Transport investments increase cultural and tourism activities.	Positive	High	A1
15	Municipalities	Adana	Çukurova	Adana Metropolitan Municipality, Head of Transportation Department-Directorate of Rail Systems	Manager	• Government transport projects appear to be more profitable than those of private companies are.	Positive	Medium	A2
16	Chambers, Unions and Development Agencies	Adana	Seyhan	Adana Chamber of Industry	General Secretary	• It is useful combined with existing High Standard Train Lines. • Communication should be made with our institution about social investment projects.	Positive	Medium	A2
17	Public Institutions / Public Services Providers	Adana	Seyhan	Adana Regional Directorate of TCDD Transportation Incorporated Company, Directorate of Services	Principal deputy assistant	• Connection should also be provided in terms of cargo transportation.	Positive	Medium	A2
18	Public Institutions / Public Services Providers	Adana	Seyhan	Adana 6th Regional Directorate of TCDD, Railway Maintenance Service, Branch of Superstructure	Engineer	• Tourism potential increases if the train line extends to Silifke. • Access roads to Adana-Yumurtalık-Karataş regions are in insufficient condition. If transport develops here, development is achieved in terms of tourism. Thereby, dependence on Mersin on marine tourism decreases.	Positive	High	A1
19	Public Institutions / Public Services Providers	Adana	Seyhan	Adana 6th Regional Directorate of TCDD, Railway Maintenance Service	Assistant Service Manager	• There are agricultural activity areas along the project route. There are concerns about expropriation. Local people in these areas need to be particularly informed.	Negative	Medium	C2
20	Municipalities	Adana	Ceyhan	Ceyhan District Municipality, Directorate of Mukhtar Affairs	Responsible Manager	• The work in Ceyhan stopped due to the some legal process	Negative	Low	C3
21	Municipalities	Osmaniye	Central District	Osmaniye Municipality	Deputy Mayor	• Relations between nearby cities develop, but problems can occur at inner-city crossing points. • Both institutions and local people have not acknowledgement about the Project.	Positive	Low	A3
22	Public Institutions / Public Services Providers	Osmaniye	Central District	Osmaniye Provincial Directorate of Environment and Urbanisation	Deputy Manager	• If access to the Organized Industrial Zone increases, the industry also develops. • Toprakkale region is in the direction of the development of the city, but in distance. Distance will not be a problem if the transport problem is solved.	Positive	Medium	A2

	Community Stakeholders	Province	District	Institution	Representative Person	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
23	Public Institutions / Public Services Providers	Osmaniye	Central District	Osmaniye Provincial Directorate of Environment and Urbanisation, Directorate of Planning and Settlement	Manager of Branch Office	• In the Central District of Osmaniye, there must be station. If the station is in Toprakkale, the number of passengers will decrease. For people living in Osmaniye, 5 or 6 km is a long distance. They do not prefer to go to Toprakkale to use the train.	Negative	Low	C3
24	Municipalities	Osmaniye	Düziçi	Düziçi District Municipality	Deputy Mayor	• The station has a significance within the district. East-West trains pass through here. Train use is not common as existing trains are delayed. However, it is preferable if there is a high-standard train. High standard trains are an alternative to passenger cars.	Positive	High	A1
25	Municipalities	Osmaniye	Bahçe	Bahçe District Municipality	Deputy Mayor	• Because of the high standard train, the overpass was built. Access roads to some villages were blocked. • Access to the highway of Savranlı and Çolaklı villages and Hasanbeyli town was cut off. Nowadays they cross over the railway track to access the roadway. When the rails are laid, transportation is completely disrupted.	Negative	High	C1
26	Municipalities	Osmaniye	Nurdağı	Nurdağı District Municipality, Branch of Zoning and Urbanisation	Technician	• There is no economic activity other than vehicle trading. There is no industrial activities there is no business area in capacity. Livestock is low, while farming is in good condition. • Young people are going out of province due to the unemployment If job opportunities are opened to young people, if employment is provided, there will be many who will benefit.	Positive	High	A1
27	Municipalities	Gaziantep	Şehitkamil	Adana Metropolitan Municipality,	Deputy Mayor	• Gaziray (light rail system), Metro and high standard rail are parts of an integrated transport system within the Transport Master Plan.	Positive	High	A1
28	Chambers, Unions and Development Agencies	Gaziantep	Şehitkamil	Silk Road Development Agency	Expert	• Advantage: contributes to the economy. Gaziantep; van, Urfa, Diyarbakır, Mardin, Şırnak, Kızıltepe, Nusaybin, Birecik, Suruç, Adıyaman is the logistics center for the regions. • Disadvantage: It is bad that Gaziantep is the last station. The line is not cut in Gaziantep and it is more useful to connect to lines such as Konya, Adana, and Ankara.	Positive	High	A1
29	Governorates	Gaziantep	Şehitkamil	Gaziantep Governorate	Deputy Governor	• Transportation between Mersin and Gaziantep is problematic in both commercial and tourist traffic. A high standard train corrects this situation.	Positive	High	A1
30	Public Institutions / Public Services Providers	Gaziantep	Şehitkamil	TCDD General Directorate of Infrastructure	Gar Manager	• It increases the value of where the high standard train passes. • High standard rail increases Gaziantep's popularity. • There is a very big project like Gaziray.	Positive	High	A1

7.1.2 Consultation with Mukhtars

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

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

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

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

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

According to the general results of the mukhtar interviews, 8 of the interviews expressed negative opinions, 7 of the interviews expressed neutral opinions and the remaining 4 interviews expressed positive opinions.

Table 7-4. Distribution of Mukhtar Interviews Results by Province

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

Table 7-5. Completed Mukhtar Interviews and the Interview Results

	Province	District	Village / Neighborhood	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
1	Adana	Ceyhan	Çakaldere	The project has no positive or negative impact. It is a state Project. I know that expropriations have been made and payments have been received.	Neutral	Low	B3
2	Adana	Ceyhan	Kuzucak	The project has no impact.	Neutral	Low	B3
3	Adana	Ceyhan	Toktamış	There were two levels at the crossing. One of them needs to be shut down.	Negative	Low	C3
4	Adana	Ceyhan	Küçükburhaniye	Traffic is blocked when the freight train passing through Ceyhan and the passenger train passes through it are closed (*during the train crossing*). If the freight train breaks down, it gets very busy for hours. A patient cannot go to Adana from the surrounding hospital.	Negative	High	C1

	Province	District	Village / Neighborhood	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
5	Adana	Ceyhan	Çokçapınar	The devices were put for dust measurement noise measurements . They told us the route.	Positive	Low	A3
6	Osmaniye	Bahçe	Savranlı	The asphalt is broken. We met with the construction masters. The road to and from the village was closed due to the train (*Aygır-Hasanbeyli-Çolaklı*). We wonder if it will be connected because the road to the village is cut off.	Negative	High	C1
7	Osmaniye	Bahçe	Nohut	The available land of the village is very limited.	Negative	High	C1

	Province	District	Village / Neighborhood	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
8	Osmaniye	Bahçe	Burgaçlı	The water drawn from the source (headwater or spring) in the village dried up. Payanlı neighborhood, which is located between Yarbaşı and Taşoluk. There were 30-40 houses, and when the waters from their springs passed through the tunnel. The waters of the neighborhoods have dried up. The orchards are dry. The houses are flooded with tanks.	Negative	High	C1
9	Osmaniye	Düziçi	Çamiçi	We have knowledge about neither the Project nor expropriation.	Neutral	Low	B3
10	Osmaniye	Düziçi	Akçakoyunlu	In terms of employment, it benefits everywhere economically.	Positive	High	A1
11	Osmaniye	Düziçi	Bostanlar	No one uses many trains, but we'd be happy for the train to pass through here.	Positive	Medium	A2
12	Osmaniye	Düziçi	Yazlamazlı	The tunnel is being built. The work continues. Our villagers are very curious about where the line will pass.	Positive	Medium	A2

	Province	District	Village / Neighborhood	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
13	Osmaniye	Toprakkale	Karataş	I have neither knowledge nor idea. I just think it would be good for the country.	Neutral	Low	B3
14	Osmaniye	Toprakkale	Kışla	A level crossing (uncontrolled) is closed in the neighborhood. The neighborhood revolted. They put up a concrete barrier. A citizen comes and goes in other ways.	Negative	High	C1
15	Gaziantep	Nurdağı	Aslanlı	There is a construction site across from my village, but no one's debriefing. Moreover, the chief who works at the construction site doesn't know anything. We can't find an interlocutor to ask questions. Gar will be with us, we know the stop will be here, but there are no people to ask questions. There's a construction site, the tunnel is being worked, but we don't even know how many workers are on the construction site.	Negative	High	C1
16	Gaziantep	Nurdağı	Sakçagözü	The project did not enter our territory.	Neutral	Low	B3

	Province	District	Village / Neighborhood	Main Issue(s) of the Interview	Type of Interaction	Level of Interaction	Consequence Level
17	Gaziantep	Nurdağı	Şatırhüyük	They disrupt the roads used by construction vehicles, and there are spills of material from trucks and construction machinery. Probably Fernas ' tools. We don't know where to complain. These roads are the between Sakçagözü and Şatırhüyük	Negative	High	C1
18	Gaziantep	Şehitkamil	Sam	Project work has no effect on our settlement.	Neutral	Low	B3
19	Gaziantep	Şehitkamil	Boyno	Project work has not yet reached us.	Neutral	Low	B3

7.1.3 Focus Group Discussions and In-Depth Interviews

A focus group discussion/interview is a group process structured to obtain detailed information about a particular subject matter. A focus group discussion consists of 7-12 participants to discuss a clearly defined topic. A focus group session lasts about 1-1.5 hours and its maximum period can be 2 hours. A specialist asks open-ended questions and ensures that discussions continue in an orderly manner. In this study, it was considered sufficient to organize a focus group meeting to represent each province, and 4 focus group meetings were realized (see. Table 7-6).

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

Table 7-6. General Results of Focus Group Interviews and In-Depth Interview

Province	Heading	Issue	Representatives / Members	Main Issue(s) of the Discussions /Interviews	Type of Interaction	Level of Interaction	Consequence Level
Mersin	Vulnerable groups	Disabled person	- Tarsus Branch of Turkish Disabled Association - Tarsus Branch of the Autism Association - Tarsus Visually Impaired Association	All activities should take into account the rights of disabled people. Disabled people should also benefit from the projects being carried out. Contact with disabled associations should be made. Before developing the project, a workshop should be held with the representatives of the association.	Positive	Medium	A2
Adana	Vulnerable groups	Female	- Adana "Kadın Eli" Women's Development, Production and Business Cooperative	Definitely effects positively. Daily arrivals and departures	Positive	High	A1

Province	Heading	Issue	Representatives / Members	Main Issue(s) of the Discussions /Interviews	Type of Interaction	Level of Interaction	Consequence Level
				on the Adana-Mersin route are very busy. Between Adana and Mersin, trains are preferred instead of buses and passenger cars. We want to spread our work in Adana to the region. We want to work with associations / cooperatives that carry out similar studies We are very keen to be stakeholders of the Project.			
Osmaniye	NGOs / Professional Associations	Cooperation and solidarity	- 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	We have heard that there are problems with expropriation, especially in settlements in Bahçe District along the route. The fact that project work began longer than expected may have created problems. Local people, associations, craftsmen and people engaged in construction work do not have	Positive	Medium	A2

Province	Heading	Issue	Representatives / Members	Main Issue(s) of the Discussions /Interviews	Type of Interaction	Level of Interaction	Consequence Level
			Agricultural Engineers	sufficient knowledge of the project. For example, it is very important to share information about the route. It is a station in Toprakkale, and the absence of a station in Osmaniye can be a disadvantage.			
Gaziantep	Universities	Students	Graduate students of the department of sociology of Gaziantep University	Since Gaziantep is a city that receives migration and develops, the development of transport contributes to this situation. The positive impact of the project increases or decreases depending on the route. For example, it must extend to the eastern region or merge with other major lines. Freight transport by train is common in Gaziantep, but there is no passenger transport.	Positive	Medium	A2

8. STAKEHOLDER ENGAGEMENT PROGRAM

The stakeholder engagement plan should be updated periodically. In case of any change in the Project during the construction phase, the SEP will be updated and the updated version will be delivered to the stakeholders. The ways of reaching the stakeholders are presented below.

- Informed Consultation and Participation
- Internet/Project Website
- Mass media (local newspapers, TV channels, radio, social media).
- Hard copies on the Project site and the Municipalities in the AoI.
- Headman offices of the affected campuses

During construction and operation, updates on unforeseen and emerging events will be made available to stakeholders in the form of an annual environmental and social report, including a summary of the situation. Reports should include a summary of the complaints received (keeping the complainant's confidentiality) and how they were resolved. In addition, it should be included in the studies/surveys that are likely to be carried out in a way to cover the Social Impact Assessment or Settlements that can be carried out within the scope of the Project. The stakeholder engagement process should be initiated at the earliest stage of the Project lifecycle, in land acquisition, economic and physical displacement and should continue throughout the life of the project. Stakeholder engagement on land acquisition and resettlement will be conducted out through RAP.

8.1. Engagement of the Vulnerable Groups

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

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

Community liaison officers (one man and one woman) will be appointed to support the implementation of the SEP, with regular consultations with affected communities on any Project-related concerns. In this way, it will ensure that women and men equally receive information about the Project and convey their ideas. CLOs will also be responsible for disseminating the Project disclosure package. They will also conduct regular audits of the records regarding the complaints received and their resolution. CLOs are expected to be able to work in English and be fluent in Turkish (written and spoken), and it would be an advantage to graduate from a University or similar institution in the relevant discipline (socio sciences, communication, etc.).

In addition to the Community liaison officers, translators will be provided for the Syrian population living in the Project affected settlements. Translator will be participate public consultations, disclosure meetings and CLO visits to inform meaningfully and coorectly Project affected Syrian population.

Translation and communication consultancy will also be provided for the hotline, website and printed brochures that will be provided within the scope of Project GN. Translation and Arabic language support will be provided in the complaint submission and feedback mechanism for the meaningful participation of the Project process of all PAPs who do not speak Turkish.

Conducting focus group meetings in affected settlements for the participation of women and vulnerable groups will be held for each meeting or disclosure topic of the SEP issues of the Project.

In case women, vulnerable groups and PAPs with disabilities are unable to attend the Project consultation meetings, additional meetings will be held in Project affected settlements (villages and neighborhoods), accessible areas and at times convenient to the target groups.

These meetings will be held as the supplementary meetings for the

- Community safety disclosure,
- SEP and Grievance Redress Mechanism Disclosure,
- Employment opportunities and recruitment procedures information activities.

Above mentioned stakeholder engagement meetings have been detailed in the Stakeholder Engagement Action Plan Table.

These focus group meetings will be held simultaneously with the same content and purpose to ensure the participation of all groups who cannot reach the public meetings, to be carried out for the following groups;

- Project affected women,
- Disadvanteged and marginalized groups, Romans etc,
- Syrians, Migrants,
- Elderly people,
- Disabled People,
- Poor households.

8.2. Policy

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

8.3. Stakeholder Engagement Action Plan

Stakeholder Engagement Action Plan for construction phase of the Project is given below.

Table 8-1. Stakeholder Engagement Action Plan[3]

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
Determining the compatibility of SEP between Rönesans Holding and credit institutions	Agreement of all parties about stakeholder engagement approach, methods to be used and timeframes	Rönesans Holding and Credit Institutions	Online interview or meetings Face-to-face meetings	November 2021	Rönesans Holding	Agreement	Preparation of SEP Approval of SEP
ESIA, SEP and GM will be publicize on the Rönesans and AYGM Project Website. Documents will be available and feedbacks/complaints for the GM also will be received through the defined link in the Project website.	Disclosing the main documents of the Project Providing stakeholder participation to the Project process	Rönesans Holding and AYGM	Web site	Following the agreement of the documents	Rönesans Holding	Web site	Publicized documents Project link
SEP and Grievance Redress Mechanism Disclosure: SEP and GRM mechanism information and dislosure meetings will be held in the 4 Project affected Provinces and in all Project affected districts A presentation will be prepeared and presented to the all local stakeholders defined in the Project Stakeholder list.	To ensure the all stakeholder have information on the Project GRM and SEP process of the Project Sharing information on GRM contact persons	Rönesans Holding and Credit Institutions All stakeholders Meetings shall be include all local stakeholders Therefore following assistance to the vulnerable groups will be provided;	Online interview or meetings / face-to-face meetings Stakeholder visit	At the beginning of the construction activities, in the pre-construction process of all sectins of the	Rönesans Holding and Consultants	- E-mail - Meeting information on the website of Rönesans Holding -Construction camp site Announcement. - A letter of participation to	Meeting presentation Meeting report Meeting Photos Participation Lists

[3] This action plan is foreseen for all construction activities and will be revised according to the construction schedule of each section. In case of need, an action plan will be prepared for each section and updates will be added to the new SEP revision.

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
Preentation and meeting will include at minimum; - Project definition - Purpose of the SEP - Definig of the GRM - Assessment and solving mechanism of the Project related complaints - GRM procedure - Access tools for the GRM - Contact information of the Responsible staff of the SEP process and GRM - Concerns and suggestions stated by stakeholders - Disclosed documents and availability	Sharing information on GRM contact ways and	Providing transportation support for the PAPs living in the far neighborhood or villages, Assistance for Disabled PAPs to participate the meetings, Arranging the meetings in a accessible place for dsabled PAPs, women, migrants etc. - Providing translation for non-Turkish PAPs (Arabian translation),		Project, in all 4 Cities. Following the approval of the ESIA and SEP documents, arrangements and meetings will be held.		the village mukhtar	
Mukhtars consultation and information sharing Mukhtars of the Project affected settlements will be visited or mukhtar information meetings will be held in a common place to share information on the - Project schedule, - Community health and safety, - Employement opportunities, - Project impacts on the Project affected vulnerable gropus, - Project impact assessement	- Sharing information about the Project schedule, potential impacts, opportunities and GRM of the Project - Identifying the vulnerable groups in the affected settlements - Informing vulnerable groups living in the surrounding settlements of the Project site that cannot attend the meeting or have	Vulnerable PAPs Mukhtars	Online interview or meetings Face-to-face meetings Focus group meetings Telephone Letter/post	At the beginning of the construction activities in all 4 Cities following the approval of the ESIA and SEP documents	Rönesans Holding and Consultants	The announcement of the meetings is given at the following locations; -Construction camp site Announcement; - A letter of participation to the village mukhtar - A letter of participation to the relevant governorships and district governorships - Meeting information on	Meeting presentation Meeting report Meeting Photos Participation Lists Mukhtar Consultation Forms

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
	difficult access to the Project grievance mechanism					the website of Rönesans Holding	
Community safety disclosure meetings Informing the local PAPs and mukhtars, when a Project related risky activity will be occurred as following; - Start of construction activity - Dig deep, - Excavation transport, - Heavy vehicle traffic, - A Project activity that will increase the effect of noise, vibration or dust, - Temporary closure of roads, - Pass restriction, -increase in traffic density, -Increase in heavy vehicle traffic, -Temporary closure of land, pasture or other roads due to construction, - temporary train access crossings closure due to construction, information meetings will be held in all settlements that will be affected by the impact of the Project, alternatives will be announced. etc.	Informing the local PAPs and mukhtars when a Project related intensy activity will be occurred as	Local PAPs Mukhtars	Online interview or meetings Face-to-face meetings Informative brochures/ flyers	When needed	Rönesans	Stakeholder Site Visit Online meetings E-mail informations Posters Flyers/ brochures	Brochures/ Flyers Meeting report Meeting Photos Participation Lists Mukhtar Consultation Forms
Visiting the schools in the project affected settlements Project affected Schools and Project access road affected schools will be visited to consult the community health and safety issues and to inform on the necessary measures taken, to share the contact person information	Sharing information about the Project schedule, potential impacts, GRM of the Project	Head of the Schools Techers of the Schools	Stakeholder Site Visit Online meetings	At the beginning of the construction activities in all 4 Cities following the approval of	Rönesans Holding and Consultants	E-mail Telephone	Meeting presentation Meeting report Meeting Photos Participation Lists

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
				the ESIA and SEP documents			
Quarterly Project evaluation consultations with key stakeholders will be held to provide sharing information, lessons learnt, quarterly assessments of the social and environmental impacts of the Project	Sharing information on the SEP process, Project schedule, potential impacts and opportunities	Key stakeholders TCDD AYGM Rönesans Sub-Contractors	Online interviews / meetings	Quarterly	Rönesans Holding and Consultants	E-mail Telephone	Meeting presentation Meeting report Meeting Photos Participation Lists
Employment opportunities and recruitment procedures information activities will be held 2 method will be implemented 1. Face to face visits or meetings or onlinemeetings will be held to inform the Universities and Vocational High Schools, Professional chambers, NGO, ISKUR etc (governmental bodies) 2. Face to face visits will be done to the Mukhtars For each meeting or consultation method, written informative brochures will be provided	Sharing information on employment opportunities and procurement process	Universities and Vocational High Schools, Professional chambers, NGO who studies women employement or disabled persons, ISKUR etc (governmental bodies) Mukhtars will be informed both face to face or online and in written information sharing	Online interviews / meetings	In the process of planning for local recruitment and purchases within the scope of the project,	Rönesans Holding and Consultants	E-mail Telephone Anouncement on local media	Meeting presentation Meeting report Meeting Photos Participation Lists
Conducting focus group meetings in affected settlements for the participation of women and vulnerable groups In case women, vulnerable groups and PAPs with disabilities are unable to attend the Project consultation meetings, additional meetings will be held in Project affected settlements (villages and neighborhoods),	These meetings - Community safety disclosure, - SEP and Grievance Redress Mechanism Disclosure, - Employment opportunities and	Project affected women Vulnearble groups Syrian, Migrants, Romans, Elderly people, Disabled People	Face to face meetings Site visits	These focus group meetings will be held to ensure the participation of all groups who cannot reach the	Rönesans Holding	Face to face meetings Site visits Telephone	Meeting presentation Meeting report Meeting Photos Participation Lists

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
accessible areas and at times convenient to the target groups.	recruitment procedures information activities will be carried out simultaneously with the same content and purpose. These focus group meetings will be held to ensure the participation of all groups who cannot reach the public meetings.			public meetings.			
Stakeholder engagement meetings in; Mersin Tarsus Adana/ Seyhan and Yüreğir Ceyhan Toprakkale Osmaniye Düziçi Bahçe Gaziantep/Şehitkamil Pazarcık	Information on the ESIA, RAP and SEP -Obtaining the views and concerns of the local community on the Project; and -Involving the local communities in the decision-making process during the design, construction, and operation stage.	The Ministry of Transport and Infrastructure, TCDD, the Governor, representatives of public institutions and members of the public, mukhtars	Face to face public meetings	December 2021-March 2022	Rönesans Holding and Consultants , The Ministry of Transport and Infrastructure, TCDD,	E-mail Telephone Anouncement on local media Posters	Meeting presentation Meeting report Meeting Photos Participation Lists

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
In order to support the commitments and activities of the project, meetings and cooperation should be established with professional chambers, bar associations, NGOs on human rights policy and the management of sexual compromise incidents	Collaborations and contractions will be established with the institutions to work together during the Project on Human Rights Risks of the Project	Adana-Mersin-Osmaniye-Gaziantep Bar Association, NGOs operating in the field of human rights and women's rights, rights-based NGOs Women's work units of municipalities, related institutes of universities working on women and human rights professional chambers,	Visits, Online interviews Meetings Focus group meetings	May-December 2022 Regularly when needed	Rönesans Holding and Consultants	E-mail Telephone	Focus group/ interview forms Stakeholder meeting records Partnership consultation contracts
Social and gender inclusion meetings for the Project affected Vulnerable People in the project affected settlements	Supporting and strengthening vulnerable groups, and providing awareness raising activities through stakeholder visits and meetings	Social support and aid organizations operating in the project affected area, Mukhtars Vulnerable groups: Illiterate PAPs: Illiterate people may be disadvantaged in their life chances, social and political participation, mental health and personal relationship. PAPs with disabilities and chronic illness: These PAPs who may need to relocate and may find the move difficult or may become increasing vulnerable to Project impacts in terms of their health due to	Visits, Online interviews Meetings Focus group meetings	Once a year	Rönesans Holding and Consultants	E-mail Telephone	Focus group/ interview forms Stakeholder meeting records Partnership consultation contracts

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
		their sensitive physical and wellbeing status. - Elderly persons: A number of households that reside and/or use the land in the expropriation corridor contain elderly persons. The health of some of these elderly persons may be negatively affected by the act of relocation or due to the project construction activities. - Informal land/ house users: whose land use rights are not recognised by national legislation - Households who are significantly affected in terms of income and land take by the Project. - Households who are significantly affected by the Project in terms of their primary income (including those PAPs who have not had regular wage-based income with a job at which they work for more than one year and/or land take use for agricultural land (including animal husbandry).					

Work to Be Carried Out	Purpose	Stakeholders	Engagaement Method	Time Period	Responsible Organization	Announcement method	Outputs and Verification documents
		- Women headed households -Refugees/ migrants - The population that does not speak Turkish -Poor households or people that live below the poverty line. (minimum wage in Turkey is 2,825.90 TL net per month as of 2021). - PAPs taking on the role of primary carer for household member – Households taking care of at least one member that is elderly, sick or disabled.					

Stakeholder Action Plan for the operation phase of the Project is given below table.

Table 8-2. Stakeholder Action Plan for the Operation Phase of the Project

Work to Be Carried Out	Purpose	Stakeholders	Engagement Method	Time Period	Responsibile Organization	Anouncement Method	Output and Verification
Assign and provide training on the implementation of the SEP and Grievance Mechanism for the operation phase of the Project.	Informing employees about the scope and implementation of the GM Increasing employee awareness on stakeholder engagement activities Disclose contact information that will enable the all workers including the subcontractor to directly access the GM Ensuring the correct implementation of the GM	Staff of TCDD	Face to face meeting Online meeting	When a new subcontractor starts work, When the SEP document for all employees is revised, when the GM is revised, Before starting work, every employee	Railway Management Authority	E-mail Telephone Written notice	Traning Records Participant lists Meeting photos/ records
Disseminate information about transition of responsibilities and liabilities from the Contractor to TCDD	Responsibility follow-up of the project during the transition from the construction period to the operation period	TCDD Unit managers and specialists, CLOs, Engineers etc.	Face to face meeting Online meeting	At least 1 time for each area of responsibility before transitioning to the operational phase	The Contractor and Employer and Railway Management Authority	E-mail Telephone Written notice	Project documentation Participant lists Meeting photos/ records

Work to Be Carried Out	Purpose	Stakeholders	Engagement Method	Time Period	Responsibile Organization	Anouncement Method	Output and Verification
Keep stakeholders informed on any operation -related activities that might affect them including but not limited to: - railway closures and diversions - operational noise - traffic jams, etc.	To provide necessary information on public health and safety, Explaining alternative solutions developed for emergencies, To get the opinions of the public on the measures	Affected communities, Project affected all settlements Project affected persons Public.	Face to face meeting Online meeting	One month before starting the operation, public information meetings will be held in all affected settlements (villages and neighborhoods). During operation, in cases such as maintenance/repair, railway closures and diversions, operational noise, traffic jams, etc.	Road Management Authority	E-mail Telephone Written notice Ads posted in the neighborhood/ village cafe of the headman Flyer/ brochure	Written announcements Posted Ads flyer/ brochure Participant list Meeting records
Update and implementation of SEP, GM and considering the operational phase impact of the Project.	Adapting the living document SEP and GM to Project needs and changing conditions, To ensure the effectiveness and sustainability of the stakeholder engagement process, Ensuring the management of social and environmental risks during the operational period	Affected communities, Project affected persons Stakeholders Vulnerable groups TCDD AYGM	Desktop studies Site visits Stakeholder meetings Focus groups	At the beginning of the transition to the operational phase of the project	Road Management Authority	Submiting documents E-mail Meetings	Updated and approved documents

Work to Be Carried Out	Purpose	Stakeholders	Engagement Method	Time Period	Responsibile Organization	Anouncement Method	Output and Verification
Develop and publish Annual Environmental and Social Report (brief summary of the Annual Environmental and Social Monitoring Report (AESMR)	Monitoring the social and environmental objectives of the project Evaluation of stakeholder relations Making necessary improvements Determination of annual training needs Overall progress and assessment of the situation	AYGM TCDD	Annual Environmental and Social Monitoring Reports Social and Environmental assessment site visits Stakeholder meetings Stakeholder meetings Monthly Reports and Monthly base KPI data	In the last month of every year	Road Management Authority	Submiting documents E-mail Meetings	Developed and approved documents Site visit records Meeting participant lists or records
Disseminate information on: - railway safety - railway conditions - railway stations and railway cost	To provide necessary information on public health and safety, Explaining alternative solutions developed for emergencies, To get the opinions of the public on the measures Sharing information about the project transparently with stakeholders Ensuring that stakeholder relations are maintained based on trust and communication	Affected communities, Project affected all settlements Project external Stakeholders	Face to face meeting Online meeting	One month before starting the operation, public information meetings will be held in all affected settlements (villages and neighborhoods). During operation, in cases such as maintenance/repair, railway closures and diversions, operational noise, traffic jams, etc.	Road Management Authority	E-mail Telephone Written notice Ads posted in the neighborhood/ village cafe of the headman Flyer/ brochure	Written announcements Posted Ads flyer/ brochure Participant list Meeting records

9. GRIEVANCE MECHANISM

The Grievance Redress Mechanism (GRM) Procedure is one of the basic elements of stakeholder engagement management.

It is one of the most important tools of the stakeholder engagement management process that enables stakeholders to convey their problems, complaints and concerns about the project to the relevant units of the project, and to resolve the complaints submitted with the right methods and in a healthy communication.

The Grievance Redress Mechanism Procedure aims to ensure that problems, complaints or concerns conveyed by stakeholders are dealt with effectively without delay, and to maintain healthy stakeholder engagement based on trust.

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

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

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

The Grievance Redress Mechanism Procedure covers all internal and external Project stakeholders and all employees within the Firm.

9.1. Procedure

The Grievance Redress Mechanism Procedure describes the implementation of the Grievance Redress Mechanism, the grievance management steps, tools, management of the system, and access tools to the Grievance Redress Mechanism.

GRM procedure sets standards and principles for establishing safe and sustainable stakeholder communication.

GRM procedure contains,

- Contact address of all stakeholders,
- Workflow of the mechanism according t roles and responsibilities defined in the SEP,
- Complaints, problems and concerns received from stakeholders in a completely accessible, free, and secure system where no information is shared against third parties as data.

The grievance redress mechanism is also a tool that supports stakeholder engagement process.

- Stakeholder notifications and opinions are received and recorded.
- Communication, interviews and interactions with stakeholders are kept with location and time information.
- Stakeholder meeting reports are prepared and kept.
- Provide a database for monitoring and reporting of the Project.

9.2. 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 common 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.

9.3. 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.

9.4. 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.

External communication is the very first step in creating the appropriate Project image. It contains related Project information from inventive reports, printed publications, presentations, or web pages. The main goal of external communication is to inform the stakeholders and to conduct important message about the work and quality of the Project. External communication activities play a very important role in every phase of the Project cycle to engage with stakeholder groups which are governmental institutions, local communities, associations, organizations, academia, media, and NGO´s. A good working relationships will be established with all of stakeholders and actively elicit their input through public consultations, focus groups, face-to-face meetings. It is essential to be proactive, accessible, and responsive about project impacts and work collaboratively with the stakeholders on projects of mutual interest.

The Grievance Mechanism will provide complaint management and their responses which is intended specifically on affected stakeholders. The external communications will cover specifications of the SEP and the Grievance Mechanism. All related Project representatives and the Contractor will communicate with the stakeholders on a regular basis. For implementation and maintenance of the external communication; each request and/or feedback will be recorded and be followed and responded to by the CLO. The team will track related external communications to facilitate a local discourse with identified stakeholders and affected communities.

Sensitive complaints from stakeholders (sexual exploitation and abuse/sexual harassment/sexual harassment at the Project site and on the Project affected campuses or possible child abuse in the project areas) will be prioritized within the scope of the grievance mechanism. The authorized person who will manage the grievance mechanism will be informed about the guide prepared by the World Bank to prevent sexual exploitation, abuse and harassment cases of projects financed within the scope of construction works. Complaints of gender-based violence, exploitation and harassment can create a culture of silence due to negative community reactions. In order to avoid this, it is essential that stakeholders raise their grievances anonymously regarding these Project-related issues, and the authorities handling the grievances should address such issues in a confidential and impartial manner. In addition, regarding sensitive complaints, the Human Right Impact Assesment document prepared within the scope of the Project should be considered.

9.5. Anonymous Mechanism for Human Rights Impacts as Sexual Harrasment, Gender Based Violence, Human Trafficking, Child Labour Incidents

Anonymous Mechanism for Human Rights Impacts as Incidents of Sexual Harassment, Gender-Based Violence, Human Trafficking, Child Labor will be operated by following the stages listed below.

- Accessible tools to all PAPs, stakeholders will be used to receive the complaints or reports.

- The complainant will submit their complaints through the tools of their choice in line with their own means and preferences. Complaints will be submitted through as web page, Rönesans lov

cal head office, hotine, mail / letter, complaint-wish boxes, e-mail address of the Project.

Arabic and Turkish hotline will be taken into service for the anonymus complaints.

Wish- Complaint boxes will be placed at specific points for external stakeholders.

- Receiving and assessment of a report/ anonymous reports on a Human Rights Incident will be assessed and investigate by Rönesans with the consultant organisation cooporated.
- A human right complaint or report will be investigated with the specialist organization and consultant NGO to protect the victim.
- During the pre-investigation, legal obligations will be fulfilled, and law enforcement or legal institutions will be informed at the necessary stage.
- Third parties as irrevelant stakeholders, other workers, or off-subject units of the Project will not be informed about the incident if need to be kept confidential.
- In the face of violations of human rights or criminal events, Rönesans will take communication measures to protect the privacy of the victim, personal rights and freedoms, and act within a communication strategy in accordance with the laws within this scope.

Evaluation and resolution of the grievences about land acquisition and resettlement from the stakeholders of the project are issues that AYGM and TCDD should be involved in, and have been evaluated within the N&S Governance. In the event that complaints about land acquisition and resettlement are submitted to the REC staff, the relevant situation is conveyed to AYGM and PIU is informed about the process.

In addition, Rönesans İnşaat is responsible for the follow-up and closing of complaints and stakeholder relations. Therefore, each action to be taken within the scope of the grievance mechanism will be under the supervision of the relevant unit responsibles and CLOs of Rönesan İnşaat.

The MAG Project grievance mechanism will be operated as a segregated grievance mechanism that is structured to include the Internal and External Management Process described above and in accordance with the principles and standards set forth in this document, only related to the Project.

In other words, a Project GM software or database which will be only provided for the MAG Railway Project will be used and operated by defining the usage patterns within the scope and responsibility of the relevant personnel in AYGM, TCDD or REC.

This GM will be segregated from the current GM of the AYGM, TCDD or REC.

9.6. Contact Information

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

- Social Compliance Manager Özgür Kalafat:
  Tel: **0530 302 81 66**
- Social Compliance Department Email Address:
  maog.sosyal@ronesans.com
- Project Website:

  http://www.mersingaziantepyht.com/tr/iletisim

- Project Free Hotline::
  Tel: **0800 531 00 11**

9.7. Flowchart

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

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

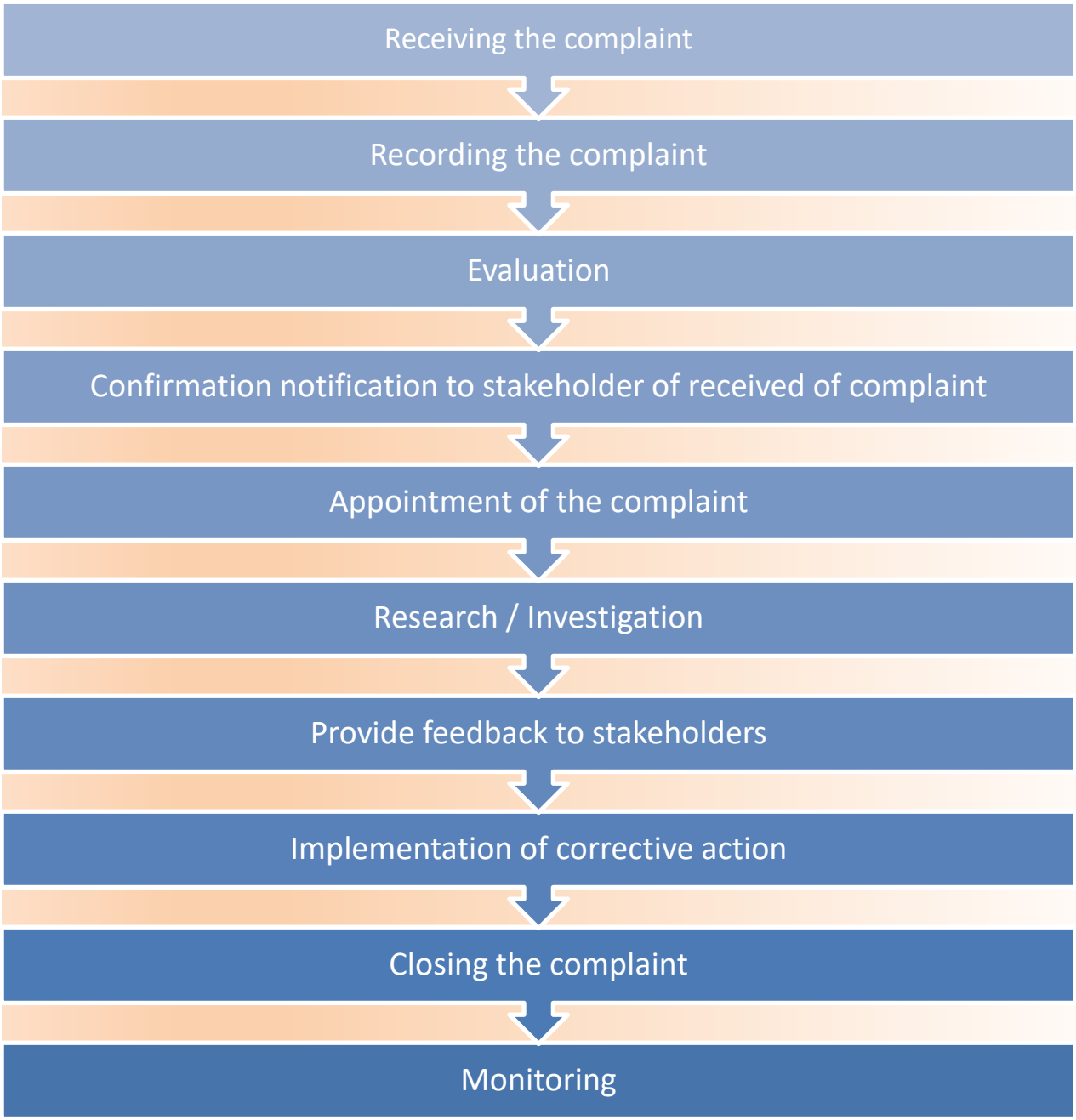


Figure 9-1. Grievance Redress Mechanism Workflow Chart

One of the standards required for the successful implementation of the grievance redress mechanism is the completion of the workflow within the defined deadlines.

The main purpose of GRM is not to respond quickly to the complaint or to resolve the complaint quickly. However, complaints that are resolved late or not responded in time may cause new problems. The issue of the complaint may cause more unsolvable issues or the trust problems with the stakeholders.

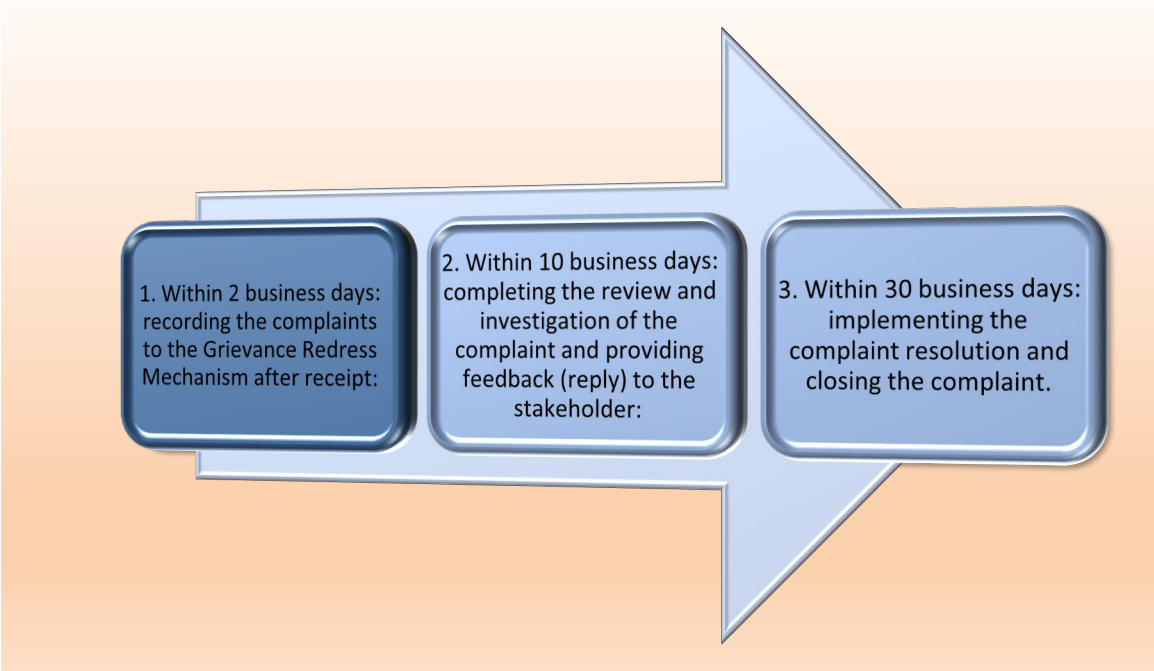


Figure 9-2. Deadline of the GRM Process

The principles and standards in the implementation process of the steps defined in the workflow chart above are detailed below.

The principles and standards to be followed by all employees, experts and managers who have access to the system in order to standardize the implementation of the GRM are explained below within the framework of workflow steps.

Table 9-1. Principles and Standards

Workflow Steps	Principles and Standards
Receiving the complaint	Accessible tools to all stakeholders will be used to receive complaints: The stakeholder can submit their complaints through the tools of their choice in line with their own means and preferences. Complaints can be submitted through various contact points such as project web page, Yenişehir construction camp, hotline, mail / letter, complaint and wish boxes, e-mail address.
Recording the complaint	Complaints will be recorded within 2 days to the GM database/software at the latest by filling out the Complaint Registration Form attached to the SEP: In order to resolve the complaints submitted by the stakeholders in a timely manner, to prevent possible disputes and new problems that may arise from the complaint issue, recording the complaints submitted to the project. duration is determined as 2 days at the latest.
Evaluation	The initial assessment will include the nature of the complaint, which unit it is related to, how it will be handled and to whom activation should be given.
Confirmation notification to stakeholder of received of complaint	After the assessment, feedback will be given to the stakeholder that the complaint has been received.
Appointment of the complaint	In order to resolve the complaint with the related company unit, the relevant Project employee is appointed. The appointed person is responsible for operating the Grievance Redress Mechanism procedure to solve the problem.

Workflow Steps	Principles and Standards
Research / Investigation	At this stage, investigations on complaints will be completed within 10 days with relevant experts. The responsible person examines the source and reasons of the complaint together with the relevant project units.
Provide feedback to stakeholders	Remedy feedback should be made within 10 days of the complaint registration. Stakeholder will be informed of corrective action by telephone, SMS, e-mail, online interview tools etc. to respond to the stakeholder. If deemed necessary, social distance and hygiene measures can be taken and face-to-face meetings can be made. The feedback submitted in response is consulted with the stakeholder. In this process, online or face-to-face interviews made using the Consultation form for interviews that are not in written format are recorded.
Implementation of corrective action	In order to close the complaint, the solution method that is consulted and agreed with the stakeholder is applied. The date, time, definition and result of corrective action are recorded by using the Closure Form.
Closing the complaint	The period for closing the complaint is determined as 30 days. The Regulatory Action and Closing Form is shared with the stakeholder by e-mail or face-to-face meeting After the declaration of the acceptance of the stakeholder, the closure form is filled and recorded to the system. Thereby, the complaint is closed and procedure is completed.

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 Project 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.

10. GRIEVANCE FORM

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

10.1. Complaint Registration Document

REC ULUSLARARASI	**MAOG** Mersin-Adana-Osmaniye-Gaziantep High-Standard Railway Project
	Şikayet Kayıt Formu / Complaint Register Form

Şikayetin Alındığı Yer / **Location of Complaint Received**		**Tarih /** Date:	
Alan Yetkilisinin Adı / Name of Person Incharge:		**Şikayet Kayıt No**/Complaint Register Number	
Arazi Parsel numarası (Şikayet arazi konulu ise) / Land Parcel Number (If complaint is related to land)			
1 - ŞİKAYET SAHİBİ HAKKINDA BİLGİ / 1 - COMPLAINANT INFO			
Ad Soyad / Name Suname :		**Şikayetin Geliş Yolu /** Form of Complaint :	
T.C. Kimlik No / Identification Number		☐ **Telefon-Ücretsiz Hat /** Phone-Free Phone Line	
Telefon / E-posta Telephone / E-mail :		☐ **Halk Toplantısı /** Community Meeting	
Adres / Address:		☐ **Dilekçe /** Petition	
Köy/Mahalle - İlçe - İl Village/Neighborhood -District -Province:		☐ **Diğer (Açıklayın) /** Other (Specify)	
* ☐ **Kişisel bilgilerimi paylaşmayı tercih etmiyorum. Şikâyetimin isimsiz alınmasını talep ediyorum.**			
2 - ŞİKAYET DETAYLARI / 2 - DETAILS OF COMPLAINT			
Şikayeti Açıklayın / Define The Complaint **:**			
Şikayet sahibi tarafından talep edilen çözüm / Solution requested by the complainant **:**			
Kayıt eden kişinin ad soyad ve imzası / Name Surname and Signature of the Registerer	**Şikayet Sahibinin ad soyad ve imzası /** Name Surname and Signature of the Complainant		
MAOG-RECU-GN-GNL-IS-GNL-FRG-0157			

10.2. Complaint Termination Form

REC ULUSLARARASI	**MAOG** MERSİN-ADANA-OSMANİYE-GAZİANTEP HIZLI TREN PROJESİ	
	Şikayet Sonlandırma Formu / Complaint Termination Form	
3 - DÜZELTİCİ EYLEMİN BELİRLENMESİ / 3 - DETERMINATION OF CORRECTIVE ACTION		
1		
2		
3		
4		
5		
6		
Sorumlu Departman(lar) / Accountable Department(s)		
Sonlandırma Tarihi / Sign off Date		
4 - TAZMİNAT ÖDENMESİ - ŞİKAYET SONLANDIRILMASI / 4 - PAYMENT OF COMPENSATION - TERMINATION OF COMPLAINT		
Tazminat talebi var mı? / Compensation measures required? : **Evet /** Yes **Hayır /** No		

Bu bölüm şikayetçi tarafından, talep ettiği tazminat ödendiğinde (tazminat talebi var ise) ve / veya bu formun önyüzünde belirttiği şikayeti giderildiğinde, doldurulup imzalanacaktır. /

This section will be filled out and signed by the complainant when requested compensation is paid (if there is a claim for compensation) and / or the complaint stated on the front page of this form is resolved.

Tarih / Date: ...../...../.....

Şikayet Sahibinin ad soyad ve imzası /
Name Surname and Signature of the Complainant

11. DUTY, RESPONSIBILITY AND TRAINING

Rönesans Holding is primarily responsible for the preparation and execution of the Stakeholder Engagement Plan. It should ensure that the plan in question is implemented and monitored until the Project is completed and operation period starts.

Responsible of the Project management team, providing the necessary resources for the implementation of the SEP and monitoring the implementation of the plan, the management of the request / complaint mechanism, and the evaluation of the submitted feedback. In addition, the subject of the complaint should work with the relevant units to gather accurate information about the problem and ensure that the result reached is conveyed to the senior management and the solution produced to the complainant.

CLOs who will be reporting to Project E&S Manager will play a leading role in communication with stakeholders.

All employees of the facility and subcontractor employees must be informed about the facility and its activities by making announcements and meetings. In accordance with the determined training hours, information will be given periodically.

12. PLAN DEVELOPMENT, MONITORING, REPORTING AND RECORDS

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

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

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

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