

Stakeholder Engagement Plan

Nakkas-Basaksehir Highway Project

Nakkaş Otoyol Yatırım ve İşletme A.Ş

21 August 2023

Project No.: 0580559

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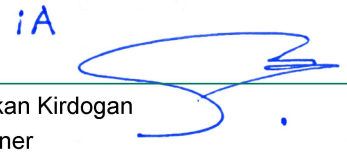
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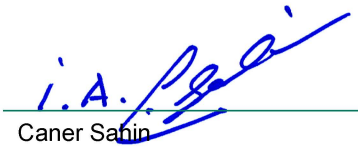
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Nakkas-Basaksehir Highway Project



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Acronyms and Abbreviations

Name	Description
BOT	Build, Operate and Transfer
CLOs	Community Liaison Officers
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environment Health Safety
EIA	Environmental Impact Assessment
EP	Equator Principles
EPDC	ESIA Public Disclosure and Consultation
ERM	Environmental Resources Management
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management Systems
ESP	Environmental and Social Sustainability Policy
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
IPDEU	Istanbul Provincial Directorate of Environment and Urbanization
İşkur	Başakşehir, Arnavutköy and Büyükçekmece State Labour Agency
ISO	International Organization for Standardization
KGM	Turkish Ministry of Transport and Infrastructure, General Directorate for Highways
LACRP	Land Acquisition, Compensation and Resettlement Plan
MoEUCC	Ministry of Environment, Urbanisation and Climate Change
MoLSS	Ministry of Labour and Social Security
MotMAC	Ministry of Transport, Maritime Affairs and Communications
NGO	Non-Governmental Organizations
NMM	Northern Marmara Motorway
OHSAS	Occupational Health and Safety Assessment Series
PR	Performance Requirements
PS	Performance Standards
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan

1. INTRODUCTION

1.1 Purpose of this Document

Nakkaş Otoyol Yatırım ve İşletme A.Ş (hereafter referred to as “Nakkaş Otoyol A.Ş)” is the Special Purpose Vehicle and is constructing the Nakkas – Basaksehir Motorway Project (the Project) which is currently in the paused stage which detailed below.

The construction of the Project has started in August 2021 while the preparation of publicly disclosed studies was being carried out:

- Environmental and Social Impact Assessment Report (ESIA);
- Stakeholder Engagement Plan (SEP);
- Resettlement Action Plan (RAP); and
- ESHS Management Plans.

Nakkaş Otoyol A.Ş paused all construction activities (earthworks, relocation works, structures etc.) as of April 2022 and proceeded with the construction of “Cable Stayed Bridge Piers” and “Viaduct Piers” which did not require any further land take.

Lately in September 2022, Nakkaş Otoyol A.Ş decided to pause all Project activities including construction of piers and demobilized a significant number of subcontractors.

This Stakeholder Engagement Plan (SEP) was developed as part of the ESIA process in line with international standards (Detailed in Section 2.2).

The main purpose of this document is to define how the stakeholder[1] engagement will be undertaken in a manner which will allow the various stakeholders to express their individual views, opinions and grievances while allowing for Nakkaş Otoyol A.Ş to appropriately respond to them during ESIA, land acquisition, construction and operation of the Project. In summary, SEP aims to:

- Identify the key stakeholders that may be affected by the Project or may influence the outcome of the Project;
- Define processes to inform the identified stakeholders about the Project and to manage stakeholder expectations;
- Define the frequency and timeline for engagement with different stakeholder groups;
- Understand current and potential emerging issues and to capture views and concerns of the relevant stakeholders with regard to the Project;
- Provide a basis for stakeholder participation in environmental and social impact identification, prevention and mitigation including impacts and risks relating to Gender Based Violence & Harassment (GBVH) including Sexual Exploitation and Abuse (SEA);
- Propose a platform for reporting back on mechanisms to address these impacts; and
- Establish a grievance mechanism that will be implemented for the Project.

This SEP is a “living document” which will be routinely updated as the Project progresses through the various stages of development. The key documents to be shared with the relevant stakeholders prior to the construction phase will comprise the following:

- Grievance mechanism and complaint forms;

[1] Stakeholders refers to all persons and parties who are interested in or affected by the Project, such as local public/villagers, local, regional and national government bodies, business organisations, non-government organisations, workers, and worker organisations etc.,

- Project leaflet (in Turkish, English and Arabic) and information postcard for village level information;
- ESIA Report;
- Environmental and Social Action Plan (ESAP);
- Non- Technical Summary (NTS);
- Environmental and Social Management and Monitoring Plan (ESMMP);
- Critical Environmental and Social Management Plans
  - Construction Environmental and Social Management Plan
  - Biodiversity Action Plan
  - Air Quality and Emission Control Plan
  - Blasting Management Plan
  - Waste Management Plan
  - Wastewater Management Plan
  - Landscape Management Plan
  - Noise and Vibration Management Plan
  - Pollution Prevention Management Plan
  - Traffic Management Plan
  - Community Health and Safety Plan
  - Emergency Preparedness and Response Plan
  - Cultural Heritage Management Plan
  - Supply Chain Management Plan
  - Gender Action Plan
  - Labour Management Plan
  - H&S Plan
- Stakeholder Engagement Plan (SEP)
- Resettlement Action Plan (RAP)
  - including Guide to Land Acquisition and Compensation (GLAC)

The feedback received from the stakeholders will be integrated into the ESIA and final version of the documents will be disclosed at the Project website (http://www.nakkasotoyolu.com/tr) for lifetime of the Project.

1.2 Project Description

İstanbul has historically been an intersection of international and national trade routes. Due to its socio-economic attractiveness, İstanbul has also faced an intensive internal migration from across the country and its population has increased around 15.5 million (nearly 18 % of the total population in Turkey[2]). Growing population and intense logistic activities driven from economic growth create enormous traffic pressure and challenges in İstanbul and the Marmara region.

For this reason, several motorways were constructed in the Marmara Region with the aim to decrease the traffic load, including the “Northern Marmara Motorway” (NMM). The NMM was originally comprised of seven sections in total connecting Asia and Europe with an uninterrupted traffic flow and is considered an alternative route to the European Road 80 (E 80 also known as Trans European Motorway (TEM). The first seven sections of the NMM have already been completed and are under operation (See Figure 1-1).

Based on the tender process held on 30 June 2020 and the agreement following on 13 April 2021, the 1st Regional Directorate of General Directorate of Motorways (KGM) involved an additional section within the scope of NMM which is called “Section 8 – Nakkaş-Başakşehir Motorway” (hereafter called the “Project”).

The Project is a new 4-lane dual toll road with a total length of 30,64 km (including connection roads) and 1,619 m long Sazlıdere Cable Stayed Bridge. Nakkaş Otoyol Yatırım ve İşletme A.Ş. (Nakkaş Otoyol A.Ş) – a Special Purpose Vehicle (SPV) under a Build, Operate and Transfer (BOT) contract signed with Turkish Ministry of Transport, General Directorate for Highways (KGM) in 2020 – is responsible for the construction and operation of the Project.

The construction of Nakkaş - Başaksehir Motorway (Section 8) has started in August 2021 and has been on hold since mid-2022. The Project is planned to be completed by 2025.

Nakkaş Otoyol A.Ş is planning to seek for financing of the investment costs of the Project by debt and equity under a Project Finance structure involving the European Bank for Reconstruction and Development (EBRD), the Asian Infrastructure Investment Bank (AIIB), Atradius, Standard Chartered Bank, SERV, DZ BANK and Bank of China, Deutsche Bank, Credit Suisse, the Islamic Corporation for the Development of the Private Sector (ICD) and Vakıfbank.

As a major, long-term infrastructure Project, “Section 8 – Nakkas-Basaksehir Motorway” is considered as **Category A** and it is subject to full ESIA assessment including a Resettlement Action Plan (RAP). Therefore, Nakkaş Otoyol A.Ş appointed ERM GmbH (ERM) to conduct the ESIA studies and appointed GEM Sustainability Services and Consultancy Inc. (GEM) to conduct the studies to develop RAP in line with Lenders standards as described in Chapter 2.2.

The scope of this SEP covers “Section 8 – Nakkas-Basaksehir Motorway”, and the other seven sections of NMM are not subject to this study since the other sections are already operational, so it is not possible anymore to have any leverage on these sections.

[2] Source: Turkish Statistical Institute (TUIK) – https://data.tuik.gov.tr/Bulten/Index?p=Adrese-Dayali-Nufus-Kayit-Sistemi-Sonuclari-2020-37210



Figure 1-1 Sections of Northern Marmara Motorway

More details on the Project information, scope and benefits, potential environmental and social impacts, and planned mitigation and monitoring measures will be available on Nakkaş Otoyol A.Ş website (www.nakkasotoyolu.com).

1.2.1 The Need for Project

Open-source data made available by KGM for the year 2019 indicate that existing motorway infrastructure in the area is highly congested and at near-saturation levels. Statistics are available by vehicle type: Light Goods Vehicles (LGV) and Heavy Goods Vehicles (HGV).

Sections closer to İstanbul carry the most traffic, with key section of O3 (corresponding to TEM) showing an Annual Average Daily Traffic (AADT) of over 190,000. The share of heavy traffic varies from 8 % (15 July Martyrs Bridge) up to 35 %, on the westernmost sections of O3.

Several major facilities and infrastructure are located in the Project vicinity[3], at a distance ranging from 0.7 km to 4 km from the Project Right of Way (RoW) (see Figure 1-3) and causing heavy traffic and transportation problems due to daily movements. These facilities are:

- **İkitelli Organized Industrial Zone**: Employing around 200,000 – 250,000 people with daily passenger movement around 700,000 people[4].
- **Deliklikaya Industrial Zone:** Employing around 60,000 people[5].
- **Hadımköy Industrial Zone:** Employing around 35,000 people[6].
- **Başakşehir Çam and Sakura City Hospital:** A large complex with about 2700 beds[7].
- **Atatürk Olympic Stadium:** With a capacity around 76,000 people[8].

3 Despite the proximity, none of these facilities are located within the Project route and are not envisaged to be subject to resettlement.

4 Source: İkitelli Organized Industrial Zone – www.iosb.org.tr

5 Source: İstanbul Chamber of Industry – www.iso.org.tr/haberler/etkinlikler/İstanbullu-sanayiciler-deliklikaya-organize-sanayi-bolgesinde-bulustu/

6 Source: İstanbul Chamber of Industry – www.iso.org.tr/haberler/etkinlikler/İstanbullu-sanayiciler-deliklikaya-organize-sanayi-bolgesinde-bulustu/

7 Source: Rönesans

8 Source: http://ataturkolimpiyatstadi.gov.tr/2012/tr/detay.aspx



Figure 1-2 Traffic in the Study Area[9]

[9] Northern Marmara Motorway Project, Nakkaş-Başakşehir section: Traffic and Revenues Study, Steer, March 2021



Figure 1-3 Major Facilities within the Project Vicinity

Considering the current situation as defined above, with the completion of all eight sections of the NMM, the Project will likely bring the following benefits to the region:

- Increase service quality and safety in transportation by separating regional traffic which grows and develops around the main transportation arteries in the East-West direction in the Northern Marmara Region created by urbanization and industrialization and intercity and international traffic passing through;
- Reduce the traffic accidents caused by the inadequate standard of the current roads around the Project vicinity;
- Connect the Marmara Region to the Aegean and Central Anatolia Region via a motorway network, thus travel time is planned to decrease to 1.5 hours from İstanbul to Bursa, 3.5 hours from İstanbul to Izmir, 2.5 hours from İstanbul to Eskişehir and 3.5 hours from İstanbul to Ankara;
- Contribute to the developing industrial investments of the Marmara Region that will pave the way for new investments in this region with İstanbul Airport connections, Osmangazi Bridge Gulf connection and Karasu intersections;
- Reduce the traffic load in the existing transportation networks and especially the Bosphorus crossings;
- Reduce the economic losses such as increased fuel consumption, vehicle maintenance and repair costs;
- Minimise the Greenhouse Gas Emissions (GHGs) caused by traffic density in other road network around the Project vicinity;
- Relieve the transportation problems occurring in three Industrial Zones located on the Project route;
- Ease transportation to Başakşehir Çam and Sakura City Hospital and Atatürk Olympic Stadium;
- Enable transit and heavy vehicles traffic to alternatively pass by the NMM and the Yavuz Sultan Selim Bridge, to alleviate intense traffic on the TEM-O3, Fatih Sultan Mehmet Bridge and D-100 motorway;
- Link the intercity traffic to NMM and provide a time-saving route for users;
- Help to navigate transit passenger and freight traffic coming from West-East directions to North side;
- Alleviate the transportation problems of the developing regions of İstanbul, Halkalı, Başakşehir, Kayaşehir, Bahçeşehir and Hadımköy;
- According to the Steer Group's Technical Note on "How the Nakkaş – Başakşehir Motorway is enhancing the İstanbul's road network resilience" study[10]. The Project serves some of the most densely populated areas on the European side of Istanbul. The existing road network, which concentrates east-west travel on only his two road corridors, D-100 and O3, is already congested and could pose significant risks. Natural disasters caused by debris and collapsed buildings; and
- The Project is designed to meet the latest requirements for seismic standards and continuity of traffic flow between the Marmara area and the most populated zones of the city for the evacuation of residents (fire brigade, ambulance, etc.). In particular, the new road leads directly to Kham & Sakura Hospital in Basaksehir District, a new earthquake-resistant structure that ensures continuity of all business activities in the event of an earthquake.

[10] Technical Note on How the new Nakkaş – Başakşehir highway is enhancing the İstanbul road network resilience. 03 May 2023. from Steergroup

Consequently, as illustrated in Figure 1-1, the transportation corridor between Nakkaş Junction – Başakşehir Junction has gained importance as the last missing piece of the overall motorway network.

1.2.2 Project Key Elements

The Project includes a number of elements currently identified as shown in the following Table 1-1.

Table 1-1 Project's Key Elements

Component	Details
Length of main road	24.17 km
Length of connecting roads	6.47 km
Cross Sections	2x4 lanes for main Motorway and 2x3 for connecting road
Interchanges	10
Cable Stayed Bridge	1,619 m (Length) x 46 m (Width) and Tower Height of 196 m
Overpasses	18
Underpasses	18
Viaducts	5
Culverts	55
Toll Booth	The number of toll booths has not been specified at the current stage. Free flow systems and tollgate toll collection systems will be incorporated in the Project, similar to the other segments of the NMM.
Lighting	Will be provided at cable stayed bridge, intersections and toll booths.
Service Stations/Rest Areas	There are no service stations/rest areas planned as part of the existing road design.
O&M Facilities	There are two O&M facilities planned at KM 36+300 and at 49+200 specific for Sazlıdere Cable Stayed Bridge. These O&M facilities will also serve as Disaster Recovery centres.

1.2.3 Associated Facilities

Associated facilities (AFs) are defined by EBRD as "facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities*: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist*[11]*".*

IFC defines the AFs as "*the third-party facilities which are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable. Associated facilities may include railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, and logistics terminals*[12]."

Currently there are no AFs in place since the final design has not been completed yet. In case there are AFs identified upon completion of the final design, Nakkaş Otoyol A.Ş. will ensure that the environmental and/or social risks and impacts arising from associated facilities are managed and mitigated in accordance with Turkish law, Good International Practice (GIP) and the objectives of the EBRD PRs and IFC PSs.

[11] EBRD E&S Policy 2019

[12] IFC Performance Standards on Environmental and Social Sustainability

In case the AFs are not under control of Nakkaş Otoyol A.Ş. but carried out by third parties, Nakkaş Otoyol A.Ş. will assess the potential E&S risks and shall engage and collaborate with relevant third parties to manage and mitigate these risks.

Apart from E&S risks, if Nakkaş Otoyol A.Ş. identifies opportunities to enhance benefits, Nakkaş Otoyol A.Ş. shall spend efforts to influence on relevant third parties.

1.2.4 Temporary Project Components

Temporary construction components will only be needed during the construction and will be reinstated to its original condition upon completion of the construction activities. Different from Associated Facilities, these components will be financed as part of the Project component and Nakkaş Otoyol A.Ş. will have full control on the environmental and social performances. Therefore, below components are defined as Project components but not Associated Facilities.

These components include:

- Construction Camps (Olimpiyat Campsite and Sazlıdere Campsite);
- Quarries and Borrow Pits
- Surplus Material Dumpsites.
- Concrete Plants;
- Asphalt Plants;
- Mechanical Plants; and
- Beam Production Facilities.

1.3 Project Activities and Schedule

The overall construction is estimated to last approximately 4 years. The construction activities started in August 2021 and planned to be completed by 2025. The locations where the construction activities are carried out as of May 2022 is presented in Figure 1-4.

Key milestones are:

- Cable Stayed Bridge construction from August 2021 until August 2025;
- Motorway construction from August 2021 until August 2025; and
- Test and Commissioning from the Q3 of 2025 until the Q2 of 2026.

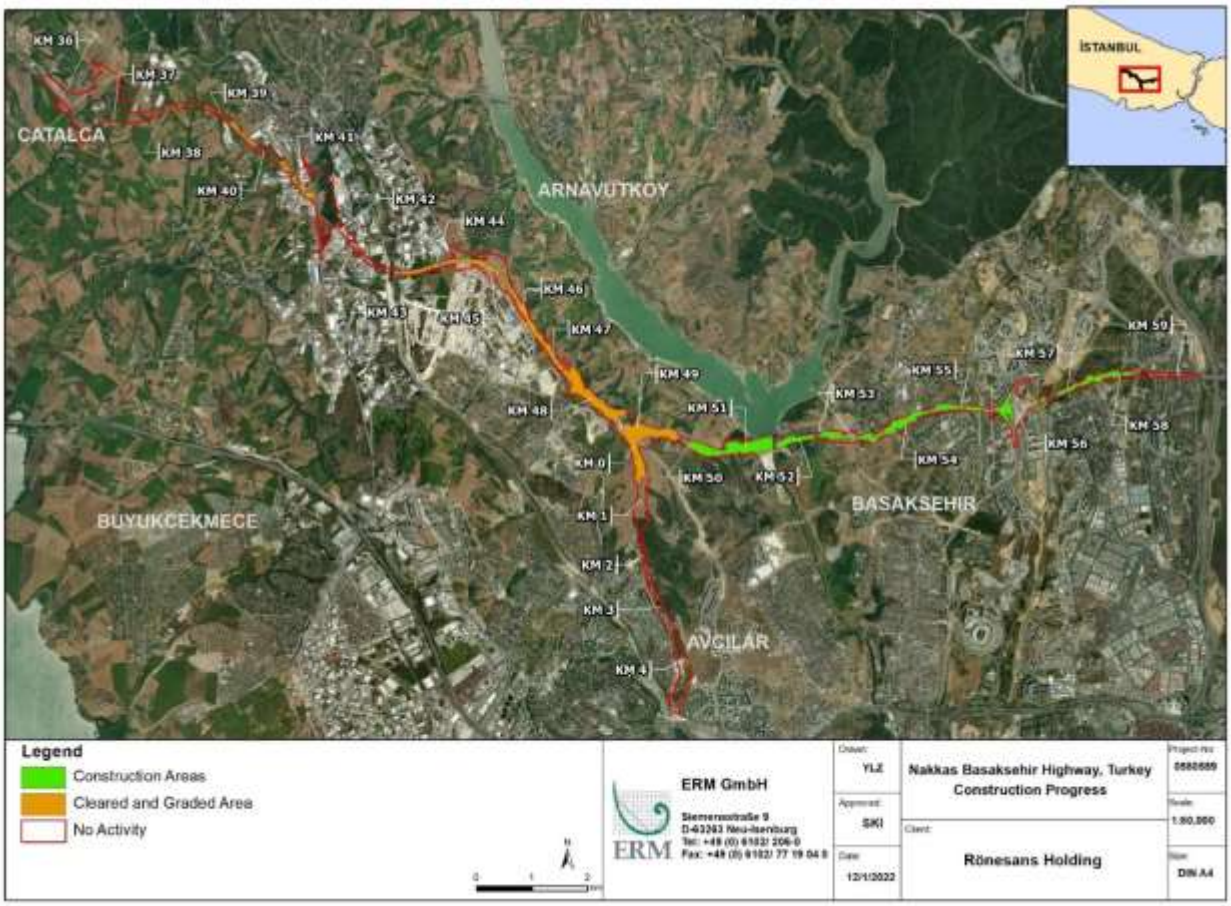


Figure 1-4 Construction Progress

1.4 Project Parties

The key parties involved in the Project and their roles and responsibilities are described in Table 1-2.

Table 1-2 Project Parties

Responsible Party	Role	Responsibilities
General Directorate of Motorways Turkey (KGM)	Project Owner	▪ Management of the BOT Contract; ▪ Approval of the design documents prepared by Nakkaş Otoyol Yatırım ve İşletme A.Ş.; ▪ Land acquisition to facilitate the construction and operation of the Project; ▪ Consultation with affected parties and valuation and negotiation of compensation in accordance with the provisions of the relevant Turkish Expropriation Law (Law No. 2942, amended in 2001 by Law No. 4650) and in accordance with Lenders' requirements.
Nakkaş Otoyol Yatırım ve İşletme A.Ş.	Special Purpose Vehicle	▪ Borrower of the Project finance; ▪ Development of Project design; ▪ Implementation of ESIA, ESMMP and all social and environmental management plans including RAP in line with Lenders requirements; ▪ Compensation of RAP related measures in addition to those provided by KGM in response to national expropriation law; ▪ Implement ESAP that will be agreed with Lenders; ▪ Procurement of Project components; ▪ Management and assurance of the construction of the Project; ▪ Operation of the Project.
REC (Rönesans Affiliate)	EPC Contractor	▪ Development of Project design; ▪ Procurement of Project components; ▪ Construction of the Project.
ERM & ACE	Independent international and national sustainability consulting firms engaged by Nakkaş Otoyol A.Ş.	▪ Development of Scoping Report; ▪ Development of ESIA Report and environmental and social management plans including Stakeholder Engagement Plan (SEP).
GEM	Independent consulting firm engaged by Nakkaş Otoyol A.Ş.	Conducting land acquisition, compensation, livelihood and resettlement related field studies to develop RAP.
ARUP	Social Advisor engaged by Nakkaş Otoyol A.Ş	Advising Nakkaş Otoyol A.Ş. with regard to RAP quality and control of the project documentation.
Arkeoteknik	Cultural Heritage Advisor engaged by Nakkaş Otoyol A.Ş	▪ Communication with relevant authorities with regard to cultural heritage sites and chance finds; ▪ Monitoring earthworks at archaeological sites Coordinating the salvage excavations with authorities when needed.

1.5 Operations and Maintenance

The BOT Contract was awarded to the Nakkaş Otoyol Yatırım ve İşletme A.Ş for 20 years including 3 years construction period, thus Nakkaş Otoyol Yatırım ve İşletme A.Ş is responsible for the detailed design, construction and operation of the Motorway during the specified BOT Contract period. At the end of this period, responsibility for operation and maintenance of the Motorway and cable-stayed bridge will be transferred to KGM.

Nakkaş Otoyol A.Ş. is responsible as BOT contractor to manage, operate, maintain, and repair the Project components during the BOT contract period, apart from the approach roads which will be handed over to the local authorities after construction. The main structures and related facilities are:

- Sazlıdere Cable Stayed Bridge;
- The motorway itself and all associated facilities located in the motorway's corridor;
- Toll plazas, management support buildings and all related facilities, equipment and systems;
- Maintenance facilities for the motorway and the bridge; and
- All signs related to the motorway and traffic safety.

A Maintenance Programme will be developed by Nakkaş Otoyol A.Ş. one year prior to operation and implemented as per the BOT Contract to assure that specified conditions are met upon the hand-back of the Sazlıdere Cable Stayed Bridge and motorway to KGM at the end of the BOT Concession Period. The Maintenance Programme must be laid out in a detailed manual which provides *inter alia* the following information:

- specifies the routine examination and maintenance operations,
- provides procedures and control sheets, and
- defines the outline of the decisions to be made in case of deviations from required standards (only if approved by KGM) and
- procedures pertaining to response to unpredictable incidents.

Nakkaş Otoyol A.Ş. will engage an "Operations and Maintenance Contractor" to undertake the operational phase of the Motorway Project (this Contract is not yet signed). The responsibilities of the O&M Contractor with respect to the maintenance and operation of the Project components, environmental protection and other relevant topics described in the ESIA and in this SEP will be embedded in the master service contract between Nakkaş Otoyol A.Ş. and the O&M Contractor.

According to the current planning it is estimated that 164 personnel will be employed throughout the operation of the Project.

2. LEGISLATIVE REQUIREMENTS AND APPLICABLE STANDARDS

2.1 National Legislation

The Project is required to comply with relevant Turkish laws and regulations related to environmental and social aspects. The key laws include but not limited to Environmental Law, Labour Law, Occupational Health and Safety Law, Expropriation Law, Law on Right to Access to Information and Law on the Use of the Right to Petition, Constitution of Republic of Turkey (1982), and Turkish Penal Code No. 5237 (2004) as briefly mentioned below:

Turkish Environmental Law (No: 2872), which came into force in 1983, is Turkey's primary framework for environmental legislation and is supported by a series of regulations that have been developed in line with national and international initiative and standards, and some of them have been revised recently to be harmonized with the European Union (EU) Directives in the scope of pre-accession efforts of Turkey. Labour, health and safety issues are collectively ruled by the Labour Law (No. 4857), Occupational Health and Safety Law (Law No. 6331) and associated regulations.

The expropriation process in Turkey is undertaken as per the requirements of the Expropriation Law (No: 2942). The Law on Right to Access to Information (No: 4982) and Law on the Use of the Right to Petition (No: 3071) are the relevant laws that allow individuals to exercise their right of information acquirement and their right to make applications to competent authorities related to their requests and complaints, respectively.

Constitution of Republic of Turkey (1982) aims to ensure the freedom and rights of people and the societies. The Constitution covers rights on land acquisition, working conditions, labour rights, right to organize labour unions, prohibition of forced labour and child labour, etc.

Article 5 and 122 of the Turkish Penal Code No. 5237 (2004) aims to prevent discrimination of gender equality.

Further other national legislation applicable to the Project can be found in ESIA Chapter 2.2.

2.2 International Standards

2.2.1 Overview of Relevant Standards

Nakkaş Otoyol A.Ş is committed to adhering to standards prescribed by the potential international lenders on Stakeholder Engagement, construction and operation stages of the Project. These standards are collectively referred to as "Relevant Standards" in the document and comprise the following:

- IFC Performance Standards, 2012; including Guidance on Disclosure and Transparency during Covid-19 of IFC, 2020);
- EBRD Environmental and Social Policy (ESP) and Performance Requirements (PR), 2019; including PR specific Guidance Notes such as the Guidance note on PR 5;
- AIIB Environmental and Social Standards (amended in November 2022); and
- Requirements for other potential lenders such as other International Financial Institutions and commercial banks adhering to Equator Principles.

An overview of the lender requirements is presented in the subsequent subsections. Please see ESIA Report Chapter 2 for more details on Project Standards entire Project lifecycle.

2.2.2 EBRD Requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR5 Land

Acquisition, Restrictions on Land Use and Involuntary Resettlement and PR10 Information Disclosure and Stakeholder Engagement.

In addition, EBRD's Independent Project Accountability Mechanism (IPAM[13]), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

2.2.3 IFC Performance Standards

The International Finance Corporation (IFC) Performance Standards (IFC PS) on Environmental and Social Sustainability are considered a benchmark for good practice for environmental and social risk management in private sector developments.

IFC PS1 outlines the stakeholder engagement requirements which includes specific guidance on conducting stakeholder engagement both during the planning phase and through the Project lifecycle.

2.2.4 Equator Principles

The Project is being developed in accordance with international financing requirements, including the Equator Principles (EP) which are intended to serve as a common baseline and framework for financial institutions to identify, assess and manage environmental and social risks when financing Projects. The Statement of Principles of the newest version of the Equator Principles, EP4, includes:

- Principle 5 "Stakeholder Engagement": demonstrate effective Stakeholder Engagement, as an ongoing process in a structured and culturally appropriate manner, with Affected Communities, Workers or other Stakeholders.
- Principle 6 "Grievance Mechanism": establish as part of the ESMS an effective grievance mechanism, designed for use by Affected Communities and Workers to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance.

Essentially, Principles 5 and 6 are aligned with the IFC Performance Standards, so no additional obligations under the Equator Principles exist beyond those of the IFC Performance Standards.

In line with the Equator Principles Guidance Note on Climate Change Risk Assessment physical risk includes both the direct risk to the assets but also the risk climate change may have on the disruption of services, supplies and resources such as water, arable land etc. Therefore, SEP will also be used to engage with relevant stakeholders to communicate such risks related to climate.

2.2.5 Asian Infrastructure Investment Bank (AIIB)

AIIB requires transparent and meaningful consultation for the design and implementation of a Project and works closely with its clients to achieve this objective. AIIB aims a meaningful consultation process that begins early and is ongoing throughout the Project. The consultation process shall be inclusive, accessible, timely and undertaken in an open manner. The information needs to be adequate, understandable and readily accessible to stakeholders in a culturally appropriate manner and in turn, enables the consideration of stakeholders' views as part of decision-making.

[13] https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html

3. STAKEHOLDER IDENTIFICATION AND MAPPING

3.1 Introduction

The objective of stakeholder identification is to establish which individuals or organizations may be directly or indirectly affected (positively and negatively) by, or have an interest in, the Project. The stakeholders identified for inclusion in engagement activities meet one of the following criteria:

- have an interest in the Project;
- would potentially be impacted by or have an influence on the Project (negative or positive); or
- could provide feedback on issues and concerns related to the Project.

3.2 Basic Principles of Stakeholder Engagement

According to IFC's "A Strategic Approach to Early Stakeholder Engagement key objectives of early strategic stakeholder engagement" include:

- Building an understanding of the local context, including stakeholder mapping and analysis;
- Building relationships based on trust and transparency;
- Ensuring consistency in stakeholder engagement and communication;
- Managing stakeholder expectations through a graduated, phase appropriate approach;
- Establishing an early, accessible, and responsive grievance mechanism for conflict management;
- Seeking "win-win" scenarios for the company and stakeholder groups; and
- Avoiding and mitigating social risks.
- Minimizing risks and maximizing opportunities to create and protect value for the project and local communities.

IFC's Good Practice Handbook on Stakeholder Engagement is widely used and have proven to be a practical and applicable source of information and guidance. As per the IFC's Good Practice Handbook on Stakeholder Engagement, a good consultation and engagement process should be:

- Targeted at those most likely to be affected by the project;
- Early enough to scope key issues and have an effect on the project decisions to which they relate;
- Informed as a result of relevant information being disseminated in advance;
- Meaningful to those consulted because the content is presented in a readily understandable format and the techniques used are culturally appropriate;
- Two-way so that both sides have the opportunity to exchange views and information, to listen, and to have their issues addressed;
- Gender-inclusive through awareness that men and women often have differing views and needs;
- Localized to reflect appropriate timeframes, context, and local languages;
- Free from manipulation or coercion;
- Documented to keep track of who has been consulted and the key issues raised;
- Reported back in a timely way to those consulted, with clarification of next steps; and
- Ongoing throughout the life of the project.

3.3 Addressing Retaliation/Reprisal Risks during Stakeholder Engagement Activities and or during the Lifetime of the Project

Rönesans Holding has Human Rights Policy[14] which is followed by Nakkaş Otoyol A.Ş. The Human Rights Policy. The Policy obliges Rönesans and parties acting on behalf of Rönesans and third parties to act in compliance with the Policy.

Following measures will be taken by Nakkaş Otoyol A.Ş to avoid any retaliation risks to communities and NGOs/CSOs in line with Rönesans Human Rights Policy.

- **Inclusion:** Prominent advocacy organizations and citizen platforms stand out among the CSOs invited via the D-Day letter dispatch. Nakkaş Otoyol A.Ş have explicitly asked them to engage the Project for meaningful discussion of ESIA findings. As such, representatives of all NGOs are welcome in all public events and Nakkaş Otoyol A.Ş will gladly abide by their requests for consultation meetings.
- **Composition:** In each open-day exhibition hall, there will be a separated/enclosed area where the Project Team may engage in depth questions from members of vulnerable and/or marginalized members of the community who may not feel comfortable express opinions safely in large gatherings.
- **Security concerns:** Separate meetings will be conducted with state and local authorities. Nakkaş Otoyol A.Ş will assess the potential risks that may entail any stakeholders at any stage of the consultation process and will take the required actions in line with the identified risks. No private or official security will be invited to the community and NGO meetings etc.

  If potential safety concerns arise, Nakkaş Otoyol A.Ş will discuss these concerns with participants in advance and devise alternative engagement options to alleviate their apprehension.
- **Facilitators or Interlocutors:** Presently, the Project's ESIA consultation does not necessitate any outside facilitator or interlocutor. Authors of the ESIA will facilitate all group consultations including NGO meetings.
- **Confidentiality:** Those visitors who do not wish to divulge any information will be reminded that the Project wishes to know the general whereabouts of their location (i.e., neighbourhood or town) in order to assess the geographic distribution of contribution. Nothing further will be asked to those who state that they wish to remain completely anonymous.
- **Privacy Right:** Personal data, confidential feedback etc. will be managed in line with Rönesans Human Rights Policy and, in line with Personal Data Protection Law numbered 6698.

3.4 Key Information for Communication

The following are some of the important messages that will be communicated to the Stakeholders:

- Background of the Project;
- Project Description and Location;
- Project Activities;
- The potential benefits and Impacts posed by the Project;
- The Process that will be followed to engage with stakeholders; and
- How and when stakeholders can participate in the enterprise development.

[14] https://ronesans.com/content/files/05-tr-i-ns-020863528c5bc475f0.61836371.pdf

It is also important that the following information is communicated to the Project stakeholders on a needs-basis:

- Construction activities;
- Any interruptions of service utilities;
- Opportunities to register grievances, and how to do so;
- Potential impacts of construction and operation activities;
- The list of grievances that have been received and resolved – this would ensure that the stakeholders are not relying on rumours as their main source of Project information; and
- Particularly, there will be need to inform the Stakeholders of all planned Project activities and potential risks and impacts on them, as well as opportunities.

3.5 Stakeholder Identification

Stakeholders refers to persons or groups who are directly or indirectly affected or who are likely to be affected by a project (project-affected parties), as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (other interested parties). (World Bank ESS10) The term `project-affected parties` includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities. (World Bank Guidance Note 5.1 and EBRD PR 10 Guidance Note[15]). The term `other interested parties` refers to individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural group. (World Bank Guidance Note 5.2 and EBRD PR 10 Information Disclosure and Stakeholder Engagement).

Stakeholder identification and engagement is an ongoing process, and thus stakeholders will continue to be updated during different stages (construction and operation) of the Project. This current version of the SEP primarily covers the Planning phase of the Project; however, the SEP will be updated in due course to reflect any newly identified stakeholder groups, during the Construction and operation of the Project. This shall be conducted by the Client, as part of its SEP update activities.

The stakeholder groups, identified through desktop research, site visits, and discussions are provided below.

- Land Owners;
- Land Users (formal and informal land users);
- Vulnerable Groups (including children, disabled persons, women and refugees);
- Sensitive receptors such as schools, mosques, parks used by children and elderly;
- Affected business owners, employees, and tenants;
- Local communities;
- Muhtars – Village chief of Project villages;
- RAP implementation partners such as KGM, KOSGEB, ISKUR, Chamber of Agricultural Engineers and Agricultural Development cooperatives;
- Other Government bodies and Regulatory authorities;

[15] https://www.ebrd.com/information-disclosure-and-stakeholder-engagement.pdf

- Universities;
- NGOs;
- Media Outlets;
- Trade Unions; and
- Internal stakeholders (workers, contractors, suppliers, etc.)

The preliminary list of the stakeholders is presented in **Appendix A** will be updated after the ESIA disclosure, land acquisition, construction and operation as new stakeholders are identified. If the stakeholders who review this SEP think that they also should be added to our stakeholder tracker to be informed about the Project, please contact us via our Hotline 0 800 655 10 00 which belongs to Nakkaş Otoyol A.Ş.

3.5.1 Vulnerable Groups

It is particularly important to understand project impacts and whether they may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. Vulnerable people that that are directly, indirectly or potentially affected by the project, include the following:

- refugee groups;
- migrant workers;
- informal workers;
- women;
- youth and children;
- mothers of young children;
- elderly/retired;
- ethnic minorities (incl. Roma people);
- low-income households:
- physical/mental health disability; and
- discriminated groups based on social identity (i.e., sexual orientation and gender identity).

3.5.1.1 Refugee groups / Migrant workers

Refugees and migrant workers are more prone to abuse since they face multiple vulnerabilities. Since Syrians are the majority among the migrant/refugee groups in the AoI, there should be measures taken to especially engage with them. In order to communicate relevant project-information to migrant and refugee groups, a community information leaflet will be prepared in Arabic, describing the project, impacts, rights of the affected people and GM details. The CLO should furthermore hand out information brochures to relevant authorities engaged with migrant and refugee groups, such as, but not limited to: headmen offices, municipalities' migrant affairs/social aid units, NGOs who are doing humanitarian aid for the different groups of refugees etc.

The provision to NGOs of relevant information is crucial, since NGOs are often times better equipped to do the outreach to the refugee/migrant communities in their own languages and in a cultural appropriate manner.

3.5.1.2 Informal workers

Informal workers are vulnerable to abuse, due to the fact that they work under precarious conditions, have no benefits, insurance nor protections (for accidents, sickness, etc.). Refugees and migrant workers are more prone to be victims of informal work arrangements, since they have fewer prospects and might face barriers to access crucial information regarding their rights, e.g., due to language barriers. Therefore, relevant information needs to be communicated in languages other than Turkish (e.g. Arabic) and in a culturally appropriate manner. Youth and children might also be negatively affected by informal work arrangements. For children it might be difficult to access and foremost understand relevant information. Hence, all communication should be communicated in a clear and easy language. Since women in Turkey are more likely to be affected by informal work arrangements, special outreach needs to be conducted to inform women about their rights.

3.5.1.3 Women

Furthermore, project impacts could disproportionately affect women in various fields, such as employment opportunities, OHS measures and increased exposure to GBVH etc. Therefore, special outreach is needed in order to communicate relevant project information to women, since they are likely to be present in different social spheres than men. Information leaflets should be circulated to relevant government offices and NGOs in the AoI, particularly working with women and information meetings should be held in areas, where women are likely to be present. It is important, that there will be stakeholder meetings held, exclusively for women, so they have a chance to raise their views and concerns without the presence of men, which might lead to different outcomes in comparison to mixed meetings held. If possible, there should be childcare services installed for the time of the meetings. Meetings should be held to preferred timing of women, which is likely to be during daytime or late afternoon. Furthermore, since women are less likely than men to possess their own car, all meetings should be held in locations that are easily reachable by public transport. As with relevant NGOs working with migrant and refugee groups, NGO specialized in women's rights might have a better network and outreach methods, to effectively communicate relevant information to women affected by the project impacts within the Area of Influence.

3.5.1.4 Elderly, Retired, Disabled Persons

Elderly and persons with disabilities are also affected by the project. Therefore, it needs to be considered, that these persons might not be as mobile, as other affected groups. Therefore, stakeholder engagement meetings should be held in central locations that are easily to be reached and accessed by persons that might face barriers due to physical disabilities. Furthermore, information should be communicated to these groups written and verbally in easy language, large print should be used for any form of written information and if possible, graphics and visuals should be additionally used to communicate and educate about the process. For meetings held that are likely to involve elderly or disabled persons (e.g., in Kayabasi and Şahintepe there are most disabled persons reported), the meetings should preferably be held during the daytime, in order to increase safety for participants when travelling to the meeting location. Elderly and disabled persons might not want to leave their homes at night.

Relevant information on special needs of vulnerable stakeholder groups can be summarized in table format. Table 3-1 below represents an example for summarizing vulnerable stakeholder needs. Such a list should be regularly updated throughout the project lifecycle; whenever new information is received.

Table 3-1 Stakeholder Engagement Program for Vulnerable Groups

Stakeholder group	Key characteristics	Vulnerability to Risk	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, childcare, daytime meetings
Women with young children	Approximately 180 households affected; 300 children	Informal work arrangements , GBVH	Official language, use of easy language	Written information, radio, involve women specific NGOs	Childcare for meetings—late afternoon preferred timing, meeting location should be easily accessible by public transport
Refugees	Mostly Syrian refugees within AoI	Informal work arrangements , abuse, human rights violations	Arabic language should be used in addition to official languages	Visit with translator and civil society representative or NGO representatives	Graphics, education on process, preferred meeting time might be after work hours
Elderly, Disabled people	Mostly reported in Kayabasi and Şahintepe neighborhoods	minimal income, physical or mental capacity to cope with changes, elderly might be reliant on subsistence farming (loss of lands can mean the loss of food.)	Use of easy language	Radio, TV, verbal communication (considering possible illiteracy)	Large print, easy accessibility for location of stakeholder meetings, preferred meeting time during the day

3.6 Stakeholder Analysis and Mapping

There are various stakeholder groups identified in the subsection above and the profiles of each stakeholder group varies from another. One of the key groups identified comprises government bodies and regulatory authorities, which can be grouped as national, provincial, district and local (i.e. neighbourhood) levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and certain other departments are responsible for providing infrastructure relevant to the Project. A list of governmental agencies and other public bodies that are relevant to the Project with roles linked to the Project is provided in Table 3-2.

Table 3-2 Roles of Authorities and Public Institutions

Level	Organisation	Project Phase	Relation to the Project
National	Ministry of Transport, Maritime Affairs and Communications (MotMAC), General Directorate of Infrastructural Investments	Construction and Operation	MoTMAC has regulatory functions such as issuing relevant permits for infrastructural investments.
	Ministry of Transport, Maritime Affairs and Communications (MotMAC), General Directorate of Motorways (KGM)	Construction and Operation	KGM has to authority to plan, outsource construction and operation of motorways. KGM develops routes, set technical specifications. KGM also carries out land acquisition and hand over to contractor.

Level	Organisation	Project Phase	Relation to the Project
	Ministry of Environment,Urbanisation and Climate Change (MoEUCC), General Directorate of EIA, Permits and Audits	Construction	MoEUCC has regulatory functions such as environmental impact assessment permits and environmental permitting.
	Ministry of Environment,Urbanisation and Climate Change (MoEUCC), General Directorate of Environmental Management	Construction	
	Ministry of Environment,Urbanisation and Climate Change (MoEUCC), General Directorate of Spatial Planning	Construction	
	Ministry of Labour and Social Security (MoLSS), General Directorate of Occupational Health and Safety	Construction and Operation	MoLSS may have specific views on labour and working conditions, and occupational health and safety.
	MoLSS, General Directorate of Labour	Construction and Operation	
	MoLSS, Social Security Institution	Construction and Operation	
Provincial	Istanbul Governorship	Construction and Operation	The governorship is the highest authority in the province representing national government.
	Istanbul Metropolitan Municipality (IMM)	Construction and Operation	The municipality and its relevant departments have responsibilities for the Project (e.g., issuing of permits and licenses of construction works and traffic planning).
	IMM Department of Fire Brigade	Construction and Operation	In case of fire, fire brigade is the responsible body to respond.
	Istanbul Provincial Directorate of Environment and Urbanization (PDEU)	Construction	PDEU has regulatory functions relating to the Project such as environmental impact assessment permits and environmental permitting. PDEU may have views on future construction activities.
	İstanbul Provincial Directorate of Disaster and Emergency Management	Construction and Operation	This organization has a function to manage and respond to emergency cases.
	Istanbul Provincial Directorate of 112 Emergency Medical Services.	Construction and Operation	In case of adverse health issues, 112 Emergency Medical Services is informed.
	İstanbul Provincial Directorate of Culture and Tourism	Construction	This organization may provide specific view related to archaeological potential of future construction areas.

Level	Organisation	Project Phase	Relation to the Project
District/Local	Local Governorships (Başakşehir, Arnavutköy and Çatalca, Avcılar and Büyükçekmece)	Construction and Operation	Local municipalities and governorships and their relevant associated bodies may be important in case of emergency cases. In addition, these authorities together with the headmen of the neighbourhoods in the vicinity of construction areas may have specific views about the Project activities. Also, they are important actors in reaching out to local communities for disclosure and engagement activities, especially in reaching out to vulnerable groups. Muhtars also usually take intermediary and access support roles for complaints and grievance management.
	Local Municipalities (Başakşehir, Arnavutköy, Çatalca, Avcılar and Büyükçekmece)	Construction and Operation	
	Headmen (Muhtars) of Neighbourhoods: Başakşehir: İkitelli 1, İkitelli 2 Şamlar, Kayabaşı, Şahintepe, Tatarcık Arnavutköy: Deliklikaya, Hadımköy, Ömerli, Sazlıbosna, Yeşilbayır Büyükçekmece: Karaaağaç Çatalca: Bahşayiş, Nakkaş, Avcılar: Firuzköy, Ispartakule	Construction and Operation	
	Başakşehir, Arnavutköy and Büyükçekmece State Labour Agency (İşkur)	Construction and Operation	İşkur offices register people seeking employment and assist for finding jobs especially for unskilled and semi-skilled workforce register for finding jobs. Thus, local İşkur offices can facilitate local employment in the Project.

Below presents the profiles of various stakeholder groups and analyses of influence of each stakeholder group on the Project and the impacts of the Project on each stakeholder group.

3.7 Stakeholder Mapping

Mapping will also help identify stakeholders who may find it more difficult to participate in consultation activities and are affected by or interested in the proposed Project because of their marginalised or vulnerable status (such as disabled or elderly people).

Table 3-3 Stakeholder Mapping

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Primary Stakeholders (external)				
Land owners whose land will be acquired	▪ This group comprises private land owners, whose land parcels are falling within the land footprint of the Project; ▪ Total number of shareholders of the 1,239 privately-owned parcels (real persons) is 5,879 including the recurring names indicated for same and/or different parcels based on the Expropriation data of June 2022; ▪ More than 50% of the land identified for the Project belongs to private land owners; ▪ This group is dependent on their land parcels for their livelihood needs even if the most of them live outside of the project affected villages and their parcels will be acquired; ▪ There are farming activities undertaken in the area, in the form of barns and small greenhouses; however the size of land holding and extent of cultivation is not accurately known in the current scoping stage; ▪ They seem to be widespread in Başakşehir districts in poor and remote neighbourhoods such as Kayabaşı as well in southwestern parts of the route; ▪ Additionally, there are commercial greenhouses and agriculture in the south of Sazlıdere dam.	▪ The land identified for the Project is used for pasture and animal grazing, agriculture and by commercial and industrial units present, per the information provided by Nakkaş Otoyol A.Ş.; ▪ The acquisition of land for the Project development activities will affect this stakeholder group leading to reduced land holdings for livelihood activities; ▪ There will be dust and noise impacts as well as land acquisition and economic resettlement impacts to agricultural areas.	▪ This group's support is key for the smooth functioning of the Project related activities in the area; ▪ The stakeholder groups' influence on the Project is contingent to smooth land acquisition process and provision of adequate and timely compensation for the land expropriated.	▪ Provision of timely and adequate information linked to land acquisition and proper engagement; ▪ The primary expectation is good compensation against land and access to remaining land parcels; ▪ Minimal disturbance to the community with regard to access issues, pollution, health and safety risks and influx of migrant workers; ▪ This Stakeholder group may expect income generating activities or employment as construction workers, masons, drivers, etc. during the construction phase of the Project.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Land users (formal and informal)	▪ There may be land users using the lands without any formal titled or tenancy agreement; ▪ To date, a total of 80 different users (100% male) have been identified along the right of way– of which 35 (32 informal + 3 formal; thus, majority being informal users) were using the private and/or state-owned parcels that have already been entered, as summarised in RAP Chapter 2.5.1.5 “Informal and Formal Agricultural Users of Lands”.	▪ These groups have the risk of being impacted and not compensated or assistance for mitigation of impacts due to loss of livelihoods, as they do not have formal rights to the land.	▪ The influence of this group on the Project is limited, given that they do not have any legal claims on the land; ▪ This group can be used during the construction phase of the Project as unskilled labour with priority hiring and may additionally be included in Livelihood Restoration initiatives.	▪ This Stakeholder group may expect employment as construction labourers during the construction phase of the Project.
Graziers	▪ Land acquisition will also cross some meadows which will mean loss of grazing areas; ▪ Animal husbandry may also experience disturbance and blockage of animal commuting and grazing routes used by Graziers; ▪ The loss of grazing areas is not a significant issue apart from specific sections of the road because cattle is mostly kept in barns and fed with fodder.	▪ The procurement of Government land that is being used will reduce the amount of land available for grazing near the Project villages; ▪ This land procurement may also lead to impact on easement or access to other areas available for livestock grazing.	▪ The influence of this group on the Project is limited, given that they do not have any legal claims on the land; ▪ Livestock forms an important part of the villages’ nutritional and energy source and may impact availability of food (milk, meat, etc.) during construction phase.	▪ The key expectations of this stakeholder group is to allow for provision of adequate grazing land in the Project area for livestock grazing-ensuring quality and access; ▪ Easements can be provided through Project design elements to have minimal impact on this stakeholder groups’ ease of activities.
Formal Local Businesses that will be impacted by Project related activities	▪ In some parts (largely in Başakşehir district) there are shops, mostly in food business and small-scale shopping. Some of these are owned by refugees; ▪ Industrial zones including various factories (manufacturing of plastics and metal goods, machinery, textile as well as bigger industrial production and food production) and	▪ There may be adverse impacts of dust, noise, vibration, traffic and access issues on these businesses; ▪ Stocking and loading areas of some of these businesses may be impacted heavily from dust if not managed well;	▪ The Project might benefit from the provision of cheap local services and goods, as required.	▪ Minimal disturbance to this group with regards to electricity and other services, access issues, pollution, health and safety risks and influx of migrant workers; ▪ This Stakeholder group may expect business opportunities during the

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
	car repair services exist in multiple areas near the Project however, they are more concentrated in northwest parts of the route; ▪ There is also presence of cargo hubs and large storage areas located at the southern west parts of the route. ▪ Among 14 affected businesses with a total of 202 formal employees (80 Female, 122 Male identified at the time of RAP preparation).	▪ Electricity service adjustments may also potentially interfere with smooth operations; ▪ There will also be positive impacts of possible increase in sales as there will be purchases by Project as well as purchases by the workers coming into the area during construction phase; ▪ For cargo hubs that are managing international freight, one of the positive impacts would be easy access to motorways and linked trans-Eurasian routes.		construction phase of the Project.
Informal Local Businesses that will be impacted by Project related activities	▪ There are a number of informal and potentially illegal scrub collection and trade barracks along the route especially around cargo hubs on the western parts of the route. ▪ 4 of the 14 local businesses reported informal employees (41 informal employees in total of which 2 are female)	▪ There is a possibility of removal / disruption of the informal businesses near the Project area. ▪ Syrians and women workers, who may permanently lose their jobs after physical resettlement if some of those businesses are settled far from their current homes	▪ The Project might benefit from the provision of local services and goods, as required.	▪ Minimal disturbance to this group with regards to electricity and other services, access issues, pollution, health and safety risks and influx of migrant workers
Informal Encroachers/ occupiers of land for other purposes squatters (for agriculture or other purposes)	▪ This stakeholder group comprises of households that have illegally encroached/occupied Government Land in the Project area and around; ▪ Encroachment of Government land is a general practice in the area, where certain households start using	▪ This stakeholder group has been using the land for livelihood activities; though does not have legitimate claims or ownership of the land. In fact, they are well aware of their illegal status;	▪ The influence of this stakeholder group present in Project villages on the Project is moderate, considering they do not have legal rights on the land; however, they have influence in the village by	▪ The key concern of this stakeholder group is of losing the land parcels which they have been using for agriculture or other purposes.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
	Government land for agriculture/animal husbandry or scrub collection and sales, without any legal ownership of the land parcel; ▪ There are unregistered land and Public land present in the area (as per data provided by Nakkaş Otoyol A.Ş.) and the possibility of its use by the locals cannot be denied at the current stage, without detailed surveys and consultations.	▪ The Project would be set up on the encroached land and would lead to disruption of economic activities and incomes to these households, and those employed by them on these lands (usually seasonally).	virtue of their economic power (they are all land owners and employers of agricultural labour).	
Owners of land required for temporary occupation or use	▪ Some of the Project components would require short term leasing of land available, largely from Private land owners; ▪ This requirement would be better understood during the time of initiation of construction activity.	▪ The short term leasing of land by the Project may bring in additional income from lease, if the land is not being used for any other commercial purposes; ▪ The Project related activities on these land parcels may be for purposes of storage, set up of labour camps, etc. and may result in change in land use due to construction or storage activities, contamination issues, etc.	▪ This stakeholder group is critical for availability of land parcels that are conveniently located from the Project footprint (based on the needs) and are available without disturbances or issues during the lease period.	▪ The expectations of this stakeholder group is clear communication of lease terms and amount and timely payments, as necessary; ▪ Restoration of land to its original state, or better, at the time of handing it back to the owners.
Vulnerable social groups such as women headed households, local residents with informal housing, refugees, informal land users for agriculture and animal husbandry, elderly, disabled and poor.	▪ This stakeholder group is comprised of groups/households that are considered to be vulnerable due to their social, political or economic status in the society. ▪ There are poor neighbourhoods along the route, with barracks/cabins and informal buildings, farming areas, animal barns and beehives	▪ The influence of Project on this group is similar in nature as the entire fence line community, as it is a subset of the same; ▪ The nature of impacts on this group is the same as the community at large; however the magnitude of	▪ The involvement of this stakeholder group is expected to be as part of the larger local community; ▪ This stakeholder group should be specifically consulted to ensure adequate provisions in the	▪ Priority in economic benefits and development opportunities created by the Project; ▪ Minimal disturbance to the community in regard to access issues, grazing

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
	especially in Kayabaşı neighbourhood of Başakşehir, Yeşilbayır neighbourhood of Arnavutköy, Bahşayış neighbourhood of Çatalca and Karaağaç neighbourhood of Büyükçekmece; ▪ Along the route, there are refugees settled possibly both formally and informally; ▪ Additionally, some residential apartment buildings are very close to the construction area; ▪ Fast track acquisition also presents risks of under consultation and disclosure of information as well as neglect of vulnerable groups and informal users of land for livelihood purposes.	the impact may be higher due to their vulnerabilities; ▪ This group may be at risk of difficulties linked to access to information and engagement, especially linked to land acquisition and grievance mechanisms; ▪ The women and children belonging to these vulnerable groups run the risk of increased risk of gender based violence and harassment due to their vulnerabilities.	resettlement and livelihood restoration planning activities due to the differential magnitude of impacts experienced by this group.	land, pollution and influx of migrant workers.
Local community from Project villages/neighbourhoods	▪ The Project is being set up on land to be acquired from 16 Project neighbourhoods and villages; ▪ The neighbourhoods within the 500m impact corridor of the Project are enlisted below: – **Başakşehir:** – İkitelli 1 – İkitelli 2 – Şamlar, – Kayabaşı, – Şahintepe, – Tatarcık	▪ The negative impacts of the Project are related to land acquisition and economic resettlement, dust, noise, vibration, traffic impacts and H&S related impacts during construction; ▪ There will be large scale private land acquisition which may present risks of limited information sharing and/ or stakeholder engagement; ▪ There may also be access and mobility related adverse issues for the local communities during construction phase as	▪ This group forms the community around the Project and may affect the construction phase of the Project, due to reliance on local and cheap resourced and manpower; ▪ The smooth operations of the Project activities will be driven by amicable relationship with the nearby community.	▪ Proper management of impacts due to Projects and advance communication of Project related activities that can affect this group; ▪ Employment and service opportunities with the Project; ▪ Well managed H&S aspects in the work environment and timely payment of wages/ service fees; ▪ A functional and well communicated Grievance management system.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders

	– **Arnavutköy:**
	  – Deliklikaya,
	  – Hadımköy,
	  – Ömerli,
	  – Sazlıbosna,
	– **Büyükçekmece:**
	  – Karaaağaç
	  – Çatalca:
	  – Bahşayiş,
	  – Nakkaş
	– **Avcılar:**
	  – Firuzköy,
	  – Ispartakule
		construction may block roads/access to public areas, harm existing roads/pavements, impact local amenities and cause extra burden on local utilities and infrastructure.
		▪ There are certain activities planned on the electricity and gas supply front and these may impact local communities' use of these utilities with disruptions;
		▪ There will be an influx of workers in the Project area, leading to potential local disturbance, gender-based violence and harassment risk issues and health risks for the communities:
		▪ During operations phase, there may also be noise and pollution impacts in settlements close to highway due to traffic movement;
		▪ On the positive side, Project will present short term employment opportunities for local residents especially during construction phase.		

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Sensitive receptors and users such as schools, mosques, parks used by children and elderly.	▪ There are schools, mosques, parks, residential buildings and other public facilities present near the vicinity of the Project.	▪ The general nature of these receptors is understood to be sensitive due to presence of children, elderly population and vulnerable households around them; ▪ This group may be impacted more than the rest due to the presence of dust, noise, vibration, and increased traffic movement.	▪ There is no specific influence of this group on the Project as it is part of the larger community.	▪ No disturbances in terms of noise, dust and other elements that can affect health and safety of this group; ▪ Proper traffic management of the vehicles engaged by the Project.
Muhtars (Village Chiefs) of Project villages.	▪ This stakeholder group is comprised of Muhtars or Village chiefs of the 15 Project neighbourhood and villages.	▪ The influence of Project on this stakeholder group Project is major since Muhtars are official governmental authorities in the villages.	▪ This group is the primary point of contact to the village and Project affected households; ▪ This group's consent and understanding of the Project is helpful to plan information disclosure activities.	▪ Involvement of this group in decision making process for the Project, especially related to the land acquisition and resettlement process; ▪ Involvement in the formulation and implementation of the community development activities for the Project; ▪ Adequate communication of Project information, in terms of timelines of key activities and their potential impacts.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Regulatory Authorities at state, central and local levels (including local municipalities and İstanbul Metropolitan Municipality (IBB))	▪ This stakeholder group comprises the national, provincial and district/ local level regulatory authorities; ▪ The roles of each key department in detailed in Table 4-2; ▪ These authorities influence the Project in terms of establishing policy, granting permits and approvals for the Project, monitoring and enforcing compliance with the applicable rules and regulations.	▪ The main concerns of the Regulatory Authorities from the Project is abidance to all applicable guidelines, policies and laws; whereas there is limited impact/ influence of Project on this group.	▪ The ability of the Project to comply with the various applicable rules and regulations may play a role in the timely implementation of the Project.	▪ Project's compliance to the regulatory requirements; ▪ Timely disclosure of information and provisioning of updated through the life of the Project; ▪ This stakeholder group is critical for various permits/clearances required for the commissioning of the Project.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Primary Stakeholders (internal)				
Contractors, sub-contractors and suppliers	▪ This stakeholder group comprises of the contractors, sub-contractors and suppliers to be involved in the Project for various tasks.	▪ The Project provides this group contractor-ship opportunities and steady flow of income.	▪ This stakeholder group is critical for the smooth functioning and timely implementation of the Project; ▪ This group may also play an important role in the formation of public opinion towards the Project.	▪ Continued economic opportunities and work generation; ▪ Clarity in terms of scope of work, expectations, key performance indicators, responsibilities and timelines for the Project; ▪ Timely and adequate disclosure of information to allow the Project activities to be carried out; ▪ Fair business opportunities and contract closure; ▪ Undertake Project activities in keeping with the contractual agreements and applicable regulations in place.
Potential workers to be engaged for the construction phase of the Project	▪ This group is comprised of skilled and semi-skilled workers, who will be involved in the Project on a contractual basis; ▪ Workers may be local, regional or migrant (from other regions) and are likely to be comprised of skilled worker and any number of semi-skilled or unskilled workers. The recruitment will be undertaken by the contractors depending on their business requirements;	▪ The influx of workers from other areas for the Project might lead to local disturbance, health issues or surge in infectious diseases, gender- based violence and harassment risks, extra burden on local services and utilities; ▪ There may be potential resentment in the community if most workers / workers	▪ This stakeholder group will be critical for the smooth functioning and timely implementation of the Project; ▪ If local workers are used, it will help create goodwill locally and the Project related opportunities would be shared with the local population;	▪ Concerns pertaining to wages, benefits, working hours and working conditions, etc.; ▪ Health and safety involved with the construction phase ▪ Working hours at the construction site ▪ Timely disbursement of wages;

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
	▪ It is estimated that 1900 workers on average will be employed during the construction phase of the Project; ▪ The split between skilled and unskilled labourers is presently unavailable hence unsure of the number of labourers to be sourced from local areas; ▪ The labourers will be accommodated in labour camps during construction phase and these camps will be shifted along the route of the motorway as construction progresses; ▪ This labourer influx may pose both positive and negative impacts to communities; ▪ Worker issues include all contractors and sub-contractors. It is expected that there will be many sub-contractors at different times/phases of the Project. ▪ Operations phase employment figures are not yet available which will be provided by SPV prior to operations phase.;	come from other areas and not from local area; ▪ Positive impacts include employment opportunities for local communities, procurement from local businesses such as food, grocery and household needs, accommodation and transportation services; ▪ However, temporary employment of locals as workers may also pose risks of access and frustration issues as well as risks around retrenchment issues and harm relations with host communities if not managed well through clear communication at the time of engagement on details and duration of engagement.	▪ This group may also play an important role in the formation of public opinion towards the Project.	▪ Provision of proper accommodation; ▪ Effective implementation of the Labour Management Plan including respect to workers' rights and avoidance of child labour/ forced labour and informal labour issues, especially due to presence of refugees in the area. ▪ Access to the Grievance Redress Mechanism (GRM) established for the Project;

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Secondary Stakeholders				
Civil Society/Local and National NGOs	▪ This stakeholder group comprises of NGOs and Civil Society Organizations of international, national and local level who may be active in the area and may have specific views on the Project; ▪ Some NGOs have already shown interest in previous phases of the Project; ▪ National level organisations are mostly environmental organisations or national level organisations of architects, engineers; ▪ Among local level organisations, NGOs working with refugee organisations may also be important; ▪ In previous phases of the motorway these NGOs have discussed issues of tree cutting and loss of forest and forest resources, impacts on water reservoir of Istanbul and other environmental issues; ▪ Some of the NGOs also have interest in affordability and accessibility issues of fares/costs to users of the Motorway; ▪ There may be coverage of the aspects linked to information disclosure and engagement, land acquisition, compensation and resettlement issues linked to the Project.	▪ The level of influence of Project on this stakeholder group is limited as it does not affect the functioning of this group.	▪ The stakeholder group may play an important role in the development of public opinion for the Project; ▪ This stakeholder group may also be involved in the implementation of the community development plans.	▪ The main expectations and concerns of the stakeholder group from the Project is likely to include the development of the Project, in keeping with the applicable regulations and with minimal impacts on the local population, while contributing towards the overall development of the area; ▪ The interest of this stakeholder group primarily pertains to the roles of the Project in implementing community development activities in the area; ▪ Timely disclosure of information pertaining to the Project; ▪ They may have specific concerns linked to tree cutting and forest loss, impacts on water reservoir of Istanbul and other environmental issues, affordability and accessibility, land acquisition and resettlement, local employment and procurement.

Relevant Stakeholders	Profile/ Status	Impact/Influence of the Project on this Stakeholder Group	Impact/Influence of the Stakeholder Group on the Project	Expectations, Opinions Key Concerns of Stakeholders
Chambers, business associations as well as cooperatives and unions and industrial zone management	▪ These include various chambers, business associations as well as cooperatives and unions; ▪ There are also industrial zones which may have interactions with the Project.	▪ These are important parties as they influence interactions of Project with local services such as transportation and procurement for both technical and non-technical works of the Project.	▪ They may also have specific views about the Project activities.	▪ Information disclosure and engagement, local procurement and service provision.
Trade Unions	▪ Workers' organisations focusing on rights of construction workers.	▪ Influence interactions of Project workers with trade unions in terms of workers' rights.	▪ Could influence the Project both directly and indirectly through consultation with workers and through potential strikes.	▪ They may have specific concerns linked to workers' rights and working conditions including wages, overtime, right to join a union, right to strike, worker living conditions, occupational health and safety issues etc.
Media	▪ The availability of ESIA will be published in mass media and announced in local media of the five districts.	▪ Media would be used for to provide project updates.	▪ The media could influence the Project directly and indirectly through broadcasts, publications and posts.	▪ Regular press releases to disclose the updated Project information.

4. STAKEHOLDER ENGAGEMENT ACTIVITIES

This section summarizes the stakeholder engagements have already been conducted and further stakeholder engagements planned for the upcoming period.

4.1 Past Key Stakeholder Engagements

Several meetings and interviews have been conducted by Nakkaş Otoyol A.Ş., ERM&ACE and GEM to inform the key stakeholders about the Project and gather their feedback during Scoping phase, ESIA studies and early stages of the construction. The details of these past engagements with various stakeholders, contacted and engaged are summarized in Table 4-1 and in Table 4-2.

Table 4-1 Details of Past Engagements

External Stakeholders	Topics of Discussion	Month	Mode of Engagement and Tools
Ministry of Environment, Urbanization and Climate Change	▪ Information on the Project and planned Project Activities ▪ Submission of Project Information Brochure ▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies	April 2021	Face to face meetings
Istanbul Metropolitan Municipality City Planning Directorate and ISKI Fire Department	Same as above	April 2021	Face to face meetings
Istanbul Metropolitan Municipality Fire Department	Same as above	April 2021	Face to face meetings
Istanbul Governorship	Same as above	April 2021	Face to Face meetings
Istanbul Provincial Directorate of Environment	▪ Submission of Project Information Brochure ▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies	April 2021	Face to face meetings
Istanbul Provincial Disaster and Emergency Directorate	Same as above	April 2021	Face to Face meetings
Istanbul Provincial Health Department	Same as above	April 2021	Face to Face meetings
İŞKUR – Başakşehir	Same as above	April 2021	Face to Face meetings
General Directorate of Highways (KGM)	Presentation held by Nakkaş Otoyol A.Ş HSE Manager to inform KGM about Project Environmental and Social requirements in line with Lenders standards.	April 2021	Face to Face meetings
Istanbul Provincial Directorate of Culture and Tourism	▪ Information on the Project and planned Project Activities ▪ Submission of Project Information Brochure	April 2021	Face to Face meetings

External Stakeholders	Topics of Discussion	Month	Mode of Engagement and Tools
	▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies		
District Governors of Başakşehir	Same as above	April 2021	Face to Face meetings
District Governors of Arnavutköy	Same as above	April 2021	Face to Face meetings
District Governors of Büyükçekmece	Same as above	April 2021	Face to Face meetings
District Governors of Çatalca	Same as above	April 2021	Face to Face meetings
Başakşehir Municipality	Same as above	April 2021	Face to Face meetings
Arnavutköy Municipality	Same as above	April 2021	Face to Face meetings
Büyükçekmece Municipality	▪ Submission of Project Information Brochure ▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies	April 2021	Face to Face meetings
Çatalca Municipality	▪ Information on the Project and planned Project Activities ▪ Submission of Project Information Brochure ▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies	April 2021	Face to Face meetings
Avcılar Municipality	▪ Submission of Project Information Brochure ▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies	April 2021	Face to Face meetings
Başakşehir Muhtars	▪ Information on the Project and planned Project Activities ▪ Submission of Project Information Brochure	April 2021	Face to Face meetings

External Stakeholders	Topics of Discussion	Month	Mode of Engagement and Tools
	▪ Submission of formal letter requesting feedback on the topics to be considered during ESIA studies		
Arnavutköy Muhtars	Same as above	April 2021	Face to Face meetings
Büyükçekmece Muhtars	Same as above	April 2021	Face to Face meetings
Çatalca Muhtars	Same as above	April 2021	Face to Face meetings
Avcılar Muhtars	Same as above	April 2021	Face to Face meetings
İşkur Başakşehir	Local Employment	April 2021	Interview via Phone Calls
Başakşehir and Arnavutköy District Agriculture Directorates	Agriculture and animal husbandry in the region	April 2021	Interview via Phone Calls
Arnavutköy Muhtars	Same as above	April 2021	Interview via Phone Calls
Büyükçekmece Muhtars	Same as above	April 2021	Interview via Phone Calls
Çatalca Muhtars	Same as above	April 2021	Interview via Phone Calls
Avcılar Muhtars	Same as above	April 2021	Interview via Phone Calls

4.2 Engagements during the ESIA and Early Construction Phase

ERM, ACE, Nakkaş Otoyol A.Ş. and GEM Sustainability applied various modes of engagement and tools due to ongoing COVID restrictions in Turkey in 2021, to obtain more feedback of potentially affected communities and incorporate this feedback into the impact assessment process. ESIA team followed EBRD's Guidance on Stakeholder Engagement during COVID 19 restrictions during the ESIA and Early Construction Phase as provided Table 4-2.

Table 4-2 Details of Engagements undertaken during ESIA and Early Construction Phase

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Istanbul Kent Konseyi	Nakkaş Otoyol A.Ş.	▪ Information sharing regarding the Project, including the background of the Project; ▪ Feedback request to understand expectations from the Project.	April 2022	E – mail
Nature Association (Doğa Derneği)	Nakkaş Otoyol A.Ş.	▪ Information sharing regarding the Project, including the background of the Project; ▪ Feedback request to understand expectations from the Project.	August 2021	Formal letter to invite for a meeting to discuss their feedback during ESIA preparation
WWF (Doğal Hayatı Koruma Vakfı)	Nakkaş Otoyol A.Ş.	Same as above	August 2021	Formal letter to invite for a meeting to discuss their feedback during ESIA preparation
Turkey Global Environmental Organization (GEO)	Nakkaş Otoyol A.Ş.	Same as above	August 2021	Formal letter to invite for a meeting to discuss their feedback during ESIA preparation
TEMA Foundation (TEMA Vakfı)	Nakkaş Otoyol A.Ş.	Same as above	August 2021	Formal letter to invite for a meeting to discuss their feedback during ESIA preparation
Doga Dernegi (Representative of Birdlife International in Turkey)	▪ Nakkaş Otoyol A.Ş. ▪ ERM	▪ Consultation Request on Project risks/impact relate to bird species and IBAs (particularly from the perspective of a planned cable-stayed suspension bridge.	August 2022	▪ E – mail
Birdlife International Headquarter	▪ Nakkaş Otoyol A.Ş. ▪ ERM	▪ Same as above	September 2022	▪ E – mail

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Headmen of the affected settlements	▪ Nakkaş Otoyol A.Ş.; ▪ ERM; ▪ GEM.	▪ Information sharing regarding the Project, including the background of the Project; ▪ Details of land identified for the Project (temporary and permanent) and the process and timelines of acquisition and their rights under the law; ▪ Resettlement and land acquisition process; ▪ Understanding of the socio-economic profile of landowners and the details of income generated; ▪ Grievance Mechanism related information; ▪ Generic discussion to understand expectations from the Project.	August 2021 October 2021 December 2021	▪ Face to face meetings; ▪ Telephonic interactions in case Covid related precautions exist or face to face meeting is rejected; ▪ Community level questionnaires (with headmen of the affected settlements).
Commercial enterprises including affected factories, local businesses	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings; ▪ Interviews with the commercial enterprises and businesses (including affected factories).
Land Owners	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings; ▪ Household level questionnaires.
Land Users	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings; ▪ Household level questionnaires.
Land Owners/Users (Standalone women meetings/interviews)	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Vulnerable persons affected from project-related land acquisition	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings
Other Governmental stakeholders	▪ Nakkaş Otoyol A.Ş.; ▪ GEM.	Same as above	August 2021	▪ Face to face meetings
Residences along the RoW- Head of Aşiyan Residences	▪ Nakkaş Otoyol A.Ş.	▪ Information sharing regarding the Project, including the background of the Project; ▪ Grievance Mechanism related information; ▪ Detailed information was also provided about the duration of construction works and potential impacts on the residences (such as parking lot entrance and exit directions, roads to be closed to traffic and pedestrian roads, community safety and landscaping works, etc.); ▪ Details of land identified for the Project (temporary and permanent) and the process and timelines of acquisition and their rights under the law; ▪ Resettlement and land acquisition process.	December 2021	▪ Face to face meeting
Residences along the RoW- Head of Yeniköy Residences	▪ Nakkaş Otoyol A.Ş.	Same as above	December 2021	▪ Face to face meeting
Residences along the RoW- Head of Hisar Residences	▪ Nakkaş Otoyol A.Ş.	Same as above	December 2021	▪ Face to face meeting
Residences along the RoW- Head of Salacak Residences	▪ Nakkaş Otoyol A.Ş.	Same as above	December 2021	▪ Face to face meeting

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Residences along the RoW- Technical Staff of Aşiyan Residences	▪ Nakkaş Otoyol A.Ş.	Information about the overhead transmission lines displacement works to be carried out at their residences at KM 59+000.	January 2022	▪ Face to face meeting
Residences along the RoW- Technical Staff of Yeniköy Residences	▪ Nakkaş Otoyol A.Ş.	Same as above	January 2022	▪ Face to face meeting
Residences along the RoW- Technical Staff of Hisar Residences	▪ Nakkaş Otoyol A.Ş.	Same as above	January 2022	▪ Face to face meeting
Sular Valley Mass Building Management	▪ Nakkaş Otoyol A.Ş.	Same as above	January 2022	▪ Face to face meeting
Residences along the RoW- Head of Kayaşehir 1st Zone	▪ Nakkaş Otoyol A.Ş.	▪ Information sharing regarding the Project, including the background of the Project; ▪ Grievance Mechanism related information; ▪ Detailed information was also provided about the duration of construction works and potential impacts on the residences (such as parking lot entrance and exit directions, roads to be closed to traffic and pedestrian roads, community safety and landscaping works, etc.); ▪ Details of land identified for the Project (temporary and permanent) and the process and timelines of acquisition and their rights under the law; ▪ Resettlement and land acquisition process.	February 2022	▪ Face to face meeting
Residences along the RoW- Head of Kayaşehir 8th Zone	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Residences along the RoW- Head of Kayaşehir 2nd Zone	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting
Residences along the RoW- Head of Kayaşehir 4th Zone	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting
Başakşehir Municipality Public Relations Manager	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting
Residences along the RoW- Head of 15th Zone 1st Section	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting
Residences along the RoW- Head of Emlak Konut Başakşehir Residences 1st Section	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	February 2022	▪ Face to face meeting
Basaksehir District Governorate	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	March 2022	▪ Face to face meeting
Residences along the RoW- Head of Vadiyaka Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	March 2022	▪ Face to face meeting
Residences along the RoW- Head of Temizkent Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	March 2022	▪ Face to face meeting
Residences along the RoW- Head of Şirin Köyüm Çayyaka Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	March 2022	▪ Face to face meeting
Residences along the RoW- Head of Özkaymak Residences	▪ Nakkaş Otoyol A.Ş.	▪ Information about overhead transmission lines displacement works to be carried out at their residences.	April 2022	▪ Face to face meeting
Residences along the RoW- Head of Yeniköy Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	April 2022	▪ Face to face meeting
Residences along the RoW- Head of Hisar Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	April 2022	▪ Face to face meeting
Residences along the RoW- Head of Asiyan Residences	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	April 2022	▪ Face to face meeting

External Stakeholders	Party Leading the Engagement	Topics of Discussion	Month	Mode of Engagement and Tools
Sular Valley Mass Building Management	▪ Nakkaş Otoyol A.Ş.	▪ Same as above	January 2022	▪ Face to face meeting
Informal and formal agricultural users of affected lands	▪ Nakkaş Otoyol A.Ş.	▪ Field survey and formal/informal user interviews with informal and formal agricultural users of affected lands.	June 2022	▪ Face to face meeting

4.3 Land Acquisition Information Meetings

KGM Expropriation Department and Nakkaş Otoyol A.Ş. carried out several land acquisition information meetings in January and February 2023 aiming to:

- Inform the community about the Project and its current conditions;
- Make corrections and updates on previous land acquisition exercises and clear misunderstandings or misinterpretations;
- Inform the owners and heirs that KGM will initiate expropriation in the coming period;
- To explain and illuminate how the expropriation process will proceed;
- To explain the status of users and how they will be addressed;
- To explain the rights of the owners and heirs;
- To briefly explain the relocation procedures in relation to businesses, residential and/or other assets;
- Notify that previously announced prices are updated by November 2022 and that KGM will make expropriation based on that revised current market prices;
- To provide information about the grievance mechanism, communication channels as well as application procedures;
- To provide general information about the supports that sponsors will provide in addition to expropriation compensations (as top-up payments and/or small-costs); and
- To increase the consent agreements and avoid court cases as much as possible.

Table 4-3 Land Acquisition Information Meetings Calendar

Nakkaş-Başakşehir Motorway Project • Land Acquisition Information Meetings Calendar

#	District	Neighborhood	Meeting Venue	Date	Time
1	Arnavutköy	Hadımköy, Hastane, Yeşilbayır	café Kafe Keyf Ayasofya Cd. No. 36, Hadımköy	January 30, 2023, Monday	14.30-16.30
2	Başakşehir	Şamlar	Şamlar Neighborhood Coffeeshop 2824 Sk. No. 107	January 31, 2023, Tuesday	10.30-12.30 14.30-16.30
3	Başakşehir	Kayabaşı	Necdet Yıldırım Culture and Life Center Boğaziçi Sk., Rabia Cd. No.6, Kayabaşı	February 01, 2023, Wednesday	10.30-12.30 14.30-16.30
4	Başakşehir	Bahçeşehir 1. Segment (Tatarcık, Deliklikaya, Firuzköy, Ispartakule, Ömerli	Bahçeşehir Culture and Life Center Seyhan Cd. No. 68/E, Bahçeşehir 1. Segment	February 02, 2023, Thursday	14.30-16.30
5	Başakşehir	Sazlıbosna	Sazlıbosna Village Coffeeshop	February 03, 2023, Friday	09.30-11.30 13.00-15.00 15.00-17.00

Nakkaş-Başakşehir Motorway Project • Land Acquisition Information Meetings Calendar

#	District	Neighborhood	Meeting Venue	Date	Time
6	Başakşehir	Hoşdere	Vaditepe 2. Section Social Facilities Ispartakule Cd. No. 32, Bahçeşehir 1. Segment	February 04, 2023, Saturday	10.30-12.30 14.30-16.30
7	Başakşehir	Başak (İkitelli 1), Başakşehir (İkitelli 2)	Cevdet Kılıçlar Culture and Life Center Balkan Sk. Başakşehir Neighborhood 1. Stage	February 05, 2023, Sunday	14.30-16.30

These meetings were attended by both expropriation experts from KGM and Nakkaş Otoyol A.Ş. who provided information on land acquisition process. At the end of 12 sessions, **347** participants (landowners) shared their personal information (Name, telephone, address etc.) to be included into the stakeholder list. In addition, approximately 60 participants preferred not to share their personal information.

Issues discussed during these consultation meetings were as follows:

- Criteria and methodology for determining the compensation values as a response to the questions regarding the details of KGM's current expropriation offer;
- Information on notification letters sent to landowners, and scheduled notifications;
- Information requests about price and parcel details before negotiation meetings;
- Information requests regarding partial expropriation;
- Information requests about how the residual lands will be used or processed under land acquisition;
- Land Acquisition Steps: Article 8 negotiations, registrations, compensation payment schedule for settlement agreements and court processes for non-agreement cases;
- Issues faced in the past (soil stripped parcels, delay in KGM payments);
- Path to follow for heirs of deceased landowners;
- Coordination between KGM and municipalities and TOKI; and
- Additional payments to be made under RAP Fund to comply with the lenders' requirements for land plots, residential houses, assets, businesses as well as small cost payments and reimbursement conditions.

During and after these consultation meetings, 49 owners/heirs agreed on the updated prices offered by KGM (under Article 8) and formal land acquisition and compensation process has been initiated immediately after the meetings.

In February 2023, KGM has started sending Art. 8 notifications to the remaining landowners based on the Updated Valuation in line with the expropriation programme agreed between KGM and SPV. As of March 2023, Art. 8 notifications based on Updated Valuation Study have been sent to 456 parcels.

As a key outcome of the Updated Valuation of KGM and public information activities conducted by the SPV, owners/shareholders of 212 parcels have applied to KGM to reach a consent agreement as per Art. 8 based on updated valuation. As of March 2023, formal agreement has been reached with 477 different shareholders (for full shares on 168 parcels and for partial shares on 44 parcels).

Compensation payments for the land plots for which agreement is reached is completed by KGM in line with the timeframes specified in the Expropriation Law. The process is ongoing for the remaining parcels.

4.4 Key Issues Raised During Past Engagements

Feedback received from stakeholders were recorded during engagements which have been addressed during ESIA studies and incorporated into the Project design. Key issues are summarised below and the further details are discussed in the following chapters.

- Access to information on the Project
- Land acquisition and compensation process
- Concerns around the impact of resettlement on children playgrounds, houses, businesses
- Impact on animal husbandry
- Local employment and procurement
- Community health and safety
- Impact on utilities, services
- Benefits to affected communities

Further information will be provided to potentially affected persons during continuous engagement and during the ESIA disclosure period. Following the SEP implementation, the stakeholder engagement process will also continue during the construction and operation of the Project.

4.4.1 Information Disclosure and Engagement

There were mixed responses with regard to the information disclosure and engagement among Muhtars. Muhtars of Başakşehir and Arnavuköy were aware about the Project on the northern routes where the bulk of the project will be carried out; however, Muhtars of Avcılar and Büyükçekmece were less aware of the southern ends of the route.

During initial consultations, some of them knew about the route, whilst some heard about it through newspapers (mostly reading about the urgent expropriation decision), internet and statements of authorities and municipalities.

Some of the stakeholders stated that they received information from real estate brokers or lawyers looking for business opportunities during the land acquisition process. Most of the stakeholders were concerned that meaningful consultations would hardly take place and information will not be disclosed in a timely manner.

4.4.2 Land Acquisition and Resettlement

Land ownership varies in different neighbourhoods. In some neighbourhoods of Başakşehir and Arnavutköy, the landowners along the route of the motorway generally live outside the Project region. This is mainly because some land plots were sold to people living outside of the village and neighbourhoods. Muhtars stated that they do not know the current landowners.

Another issue is that in most of the villages, agricultural lands are mostly rented for farming purposes, and some locals have also rented treasury land through payment (ecrimisil). Some of the rural and remote areas in the north-western and south-western parts also accommodate informal users without any official contract. Unofficial small-scale barns and small-scale greenhouses also exist along the route.

There are also meadows in some villages and neighbourhoods where there is farming and animal husbandry. However, almost all the Muhtars stated that these lands are not really used anymore. Cattle is mostly kept in barns and fed with fodder, and the sheep flock herders prefer to graze their

livestock on empty lands. Couple of Muhtars also stated that they received letters of change of status for meadows in their villages and that they have no objection to that decision.

As of March 2023, in line with Article 8, agreements have been reached with owners/shareholders of 388 parcels (176 parcels based on November 2021 Valuation and 212 parcels based on December 2022 Valuation) and disagreement has been established for 11 parcels (8 parcels based on 2021 Valuation and 3 parcels based on 2022 Valuation).

In addition to formal landowners, informal and formal agricultural users of affected parcels in affected settlements have been identified based on field surveys and interviews conducted with the settlement heads, leader farmers and other farmers in the settlements along the full alignment. Since June 2022, Nakkaş Otoyol A.Ş.has been engaging with the users of the affected parcels for the planning of community-level and household-specific livelihood restoration measures, which are presented in RAP – Section 5.7 on “Livelihood Restoration, Improvement and Assistance”.

Also, Nakkaş Otoyol A.Ş. and its resettlement consultants have been engaging with the owners of the affected businesses (including tenants) and their employees since 2021 i) to provide up-to-date information on the Project, land acquisition process and RAP studies; ii) to collect information on the land and structure ownership; iii) to identify potential impacts such as potential income loss, impact on workforce etc; iv) to identify alternatives for resettlement planning (e.g. alternative locations, if any – with their advantages/disadvantages); v) identify compensation and resettlement assistance requirements, anticipation for relocation costs for different items (e.g. assembly, disassembly, moving, improvements required at the replacement structure, cost of temporary business interruption, etc.). Key issues identified as part of the business interviews are presented in RAP – Section 4.2.7.3 and have been reflected to the livelihood restoration, improvement and assistance measures designed for the affected businesses and their employees (please see RAP – Section 5.7 on “Livelihood Restoration, Improvement and Assistance” for details).

During the information meetings held in January and February 2023, some of the participants raised their concerns regarding Project’s impact on children playgrounds and the visual impacts on the compounds landscape. The Project team clearly understood the concerns of the right holders and agreed to discuss the potential solutions with the technical teams of the SPV.

An additional meeting has been conducted with the participation of the community members, KGM and Nakkaş Otoyol A.S. The technical justifications have been shared with the community members to indicate “why the alternative solutions were not possible” and the community members have also been officially informed via correspondence submitted by KGM. The project offered to build an alternative children playground if this is accepted by the community. Additional discussions will be held and a decision will be made together with the community prior to construction.

Some portions of the Overhead Transmission Lines (OHTLs) along the Right of Way (RoW) required displacement which ended up with design changes. Land acquisition and compensation requirements and mitigation measures related with OHTLs has been discussed in RAP.

During the consultation meetings with these PAPs, their legal rights were and will continue to be explained.

4.4.3 Animal Husbandry

Scoping stage calls did not reveal concise data. However, outcome of the calls indicated that the cattle is kept in barns and fed with fodder. Only sheep flocks are grazed and move around on empty lands and probably meadows. During the site visit it was also observed that sheep flocks were grazing especially around Sazlıdere dam and at the southern ends of the route.

During early construction works, damage to livestock occurred due to unauthorised access to site. The damage has been compensated by the EPC Contractor after careful assessment of the grievances raised by livestock owners.

The Project will undertake additional measures (i.e., fencing, alternative access roads to animals prior to construction etc) to avoid potential negative impacts to livestock and will continue to engage with livestock breeders/shepherds to ensure negative impact on livestock is avoided. An agricultural expert is hired to provide additional livelihood restoration activities under the RAP fund who will engage with these group on regular basis.

4.4.4 Local Employment and Procurement

İşkur branch office representatives stated that they were disappointed for not being contacted about the opportunities during the construction of Başakşehir Çam Sakura City Hospital by the Contractor, Rönesans. It was stated that the sub-contractors did not hire locals but rather brought their previous employees from other regions with them. However, the Contractor's records indicate that 30% of the workers of hospital construction were residing at their homes, not campsites and thus this means they were employed from region.

Some of the Muhtars in Başakşehir also noted that their residents worked at the construction of the hospital. Some of the Muhtars noted that people in their neighbourhood would not be interested in temporary works, they are more interested in permanent positions. But some other noted that there are many people who lost their jobs due to closures owed to the pandemic so they would be very interested in finding jobs, even temporarily. It is important that job opportunities are more widely advertised and Muhtars are informed and the İşkur database is used in the Nakkaş Motorway construction. The Project developed a Local Employment Management Plan to ensure fair distribution of employment benefits to the region. Social team will regularly liaise with unemployed people and ISKUR office during employment.

4.4.5 Health and Safety

Stakeholders contacted during scoping and ESIA preparation were comfortable about health and safety measures presented to them on with regards to the management of construction impacts. Some of them noted that the Başakşehir Hospital was constructed by the same contractor and the construction activities did not disturb communities. However, linear construction could be different and necessary measures will be taken especially for sensitive receptors and buildings/housing areas very close to the construction site. This SEP and Community Health and Safety Management Plan include specific measures to avoid and mitigate health and safety impacts to communities living along the Motorway.

4.4.6 Utilities, services, problems of the Neighbourhoods

Almost in all neighbourhoods there was no reported problem on utilities, especially electricity, gas, water supply as well as services as the region hosts educational, health and sports facilities. Scoping calls did not report any land-based conflicts and any other major problems either. The biggest problem mentioned by the majority of Muhtars was the lack of zoning plans in some areas which prevents some local owners from constructing on their land. Couple of neighbourhoods reported that residents are disturbed of animal husbandry (odour) within urban settlements. In general, agriculture and animal husbandry are declining as the area continues to urbanize fast.

Based on the information received from Nakkaş Otoyol A.Ş., the community didn't have any concerns on relocation of the overhead transmission lines except Head of Özkaymak Residences located at Km 58+700.

Head of Özkaymak Residences expressed that the new route of the overhead transmission line was close to the residents and the residents were concerned about exposure to radiation. The residents have been informed by the Project that the new wires were raised approximately 10m higher in comparison with the old line, and there was no scientific evidence with regard to radiation exposure by the transmission lines.

4.4.7 General Attitude towards Project

In general, host communities and local stakeholders seemed positive about the Project. Local residents and businesses already suffer from traffic in the area, and they are positive towards projects that would increase mobility and efficiency. However, some NGOs who were invited to the meetings declined to comment at this phase. They will be engaged during ESIA disclosure process, and their feedback (if any) will be considered in the final ESIA.

5. TOOLS FOR STAKEHOLDER ENGAGEMENT

This section provides information on how the engagement and information sharing will be undertaken with the key stakeholders of the Project, as enlisted in **Appendix A.**

In addition to face to face public and focus group meetings, additional online tools which will be used during future stakeholder engagements will include virtual meetings, interviews via phone calls and official correspondences.

Other alternative methods considered for future engagement include:

- Email campaigns;
- Text-based messaging;
- Communication through Traditional Media – Newspapers, Radio, etc.;
- Signage boards;
- Surveys and questionnaires, for collecting feedback on specific topics such as RAP surveys, etc.; and
- Social Media.

The Project website (www.nakkasotoyolu.com) will be the most essential platform for online engagement with the relevant stakeholders of the Project. The website will provide access to digital versions of the relevant documentation as well as general information on the Project, comprising the following:

- Project Information;
- Updates on the progress and timelines;
- Grievance Mechanism for the Project, complaint forms and contact details of the key personnel linked to the Project;
- Toll free phone line number: 0 800 655 10 00; and
- The ESIA disclosure package (See section 7.4)

Stakeholders will be able to share their feedbacks and concerns through face-to-face meetings, the website, emails, toll free phone line or through direct calls to designated officials, as set up by Nakkaş Otoyol A.Ş.

The Grievance Form to assist stakeholders in providing feedback and suggestions is provided as *Appendix B*. The link to the website, email id and toll-free numbers will also be included in the following documents/ channels:

- Project Information Brochures will be distributed to Mukhtars and affected people;
- Local Media outlets comprising Newspaper Advertisements.

The Project Information Brochures have already been distributed to the key stakeholders as listed in *Appendix A,* will be made available in Muhtar offices, as well as will be available on the Project website (www.nakkasotoyolu.com).

6. STAKEHOLDER ENGAGEMENT PROGRAM FOR FUTURE

Future stakeholder engagement programme will include:

- ESIA disclosure process (including detail information on information disclosure and consultation activities to be undertaken where and when with each Stakeholder groups as listed in Appendix A;
- Pre-construction stakeholder engagement activities including consultations and negotiations to take place with affected landowners, businesses and with relevant stakeholders to communicate such risks related to climate;
- Construction Phase engagement; and
- Operation Phase engagement.

Additional efforts will be made in person via CLOs or through other relevant specialists within EPC team to establish ongoing connections with NGOs that may play an important role during Project implementation. In addition, face to face and online meetings will be conducted with NGOs to seek their feedback during ESIA disclosure period.

One of the future stakeholder engagement programmes will also include consultation with local communities while developing the **Community Development Plan** to determine the location and nature of investments. All stakeholders will be kept informed on the progress of investment activities and opportunities. Estimated timelines to identify the community investments and selection criteria will be disclosed to the communities separately.

7. ESIA PUBLIC DISCLOSURE AND CONSULTATION PLAN

7.1 Introduction

The draft ESIA will be disclosed to public review and comments for 60 days as per lenders' "Access to Information Policy". The objective of the ESIA disclosure will be to solicit feedback from all interested stakeholders on the Project's environmental and social impacts and proposed mitigation measures provided in the ESIA and management plans.

Nakkaş Otoyol A.Ş will take an anti-retaliatory position during ESIA disclosure meetings to ensure stakeholders are able raise their views without any fear of retaliation as detailed in Chapter 11.2. Stakeholders will be able to provide anonymous comments/feedback through feedback forms, telephone or other tools as they prefer to do so.

7.2 Roles and Responsibilities during ESIA Public Disclosure

Nakkaş Otoyol A.Ş, KGM, ERM, GEM, ACE as the established participants of the ESIA, SEP and RAP studies will be responsible for the execution of **ESIA Public Disclosure and Consultation** (EPDC).

In addition, Nakkaş Otoyol A.Ş has hired a communication consultancy firm (**Core Project**) specialized in the design, execution, and documenting / reporting of the Stakeholder Consultation processes of large infrastructure investments.

7.3 Communication Channels during ESIA Disclosure

7.3.1 Project website, e-mail address and correspondence address

A dedicated public consultation feedback section will be made online on the Project website during disclosure period at **www.nakkasotoyolu.com** and a dedicated e-mail address info@nakkasotoyolu.com specific to the Consultation issues will be designated.

The physical correspondence address of the Project specific to all Consultation correspondence will be made available to the public.

The website will contain an interface page putting the environmental and social impact assessment process in perspective, after which all ESIA and public consultation materials are accessed.

Also, the General Manager of Nakkaş A.Ş. will publish a message on the main landing page of the project website announcing the commencement of the disclosure period and inviting everyone to provide input, using all the communication channels including the online Comment Form.

7.3.2 Project Hotline

A call centre will be commissioned for the Project Hotline (0 800 655 10 00) to receive any calls, queries and comments from the public regarding the Project. The calls will be received during working hours in weekdays.

During non-office hours, an automatic voice will provide to callers the address of the Project website where they can fill the online Comment Form. All calls will be individually recorded to be added to the Stakeholder Register, to be given a response if the call necessitates one.

7.4 ESIA Disclosure Programme

ESIA Disclosure programme presented below aims to outline and explain the purpose and utility of the work items to be carried out for the duration of the ESIA Package Public Disclosure and Consultation period as per Lenders' policies.

The feedback received from all stakeholders will be evaluated and will be integrated into the final ESIA, SEP, RAP and other E&S management plans after disclosure period. The final ESIA, SEP, RAP and management plans will be disclosed in website throughout the lifetime of the Project.

Preparations for the disclosure period will be initiated including content creation and design of all printed material, advance ad-placement reservations in national newspapers, update of the Project website, production of info-boards to be used in the public exhibitions, as well as furnishings and audio-visual systems.

Disclosure day will be launched officially with public advertisements in the daily national newspapers with highest readership/circulation in Turkey. These ad placements in the format of public announcements will notify the public about the commencement of the consultation period, dates for public exhibitions, project website address and the various ways to provide views on the Project. The list of news outlets to be used by Nakkaş Otoyol are presented in Table 7-1.

Table 7-1 News outlets to publish public notices

Newspapers Name	Coverage (Circulation, 2022)	Date of ad placement
Hürriyet	National (151,143)	Disclosure Day
Sabah	National (156,173)	Disclosure Day

In line with international lender requirements, a wide array of documents will be subject to public disclosure and comment for 60 days.

- The draft ESIA Report (including its Annexes);
- Non-Technical Summary (NTS) of the ESIA Report;
- Stakeholder Engagement Plan (SEP):
- Environmental and Social Management and Monitoring Plan (ESMMP);
- Environmental and Social Action Plan (ESAP);
- Resettlement Action Plan (RAP);
- Specific Environmental and Social Management Plans
    - Construction Environmental and Social Management Plan
    - Biodiversity Action Plan
    - Air Quality and Emission Control Plan
    - Blasting Management Plan
    - Waste Management Plan
    - Wastewater Management Plan
    - Landscape Management Plan
    - Noise and Vibration Management Plan
    - Pollution Prevention Management Plan
    - Traffic Management Plan
    - Community Health and Safety Plan
    - Emergency Preparedness and Response Plan
    - Cultural Heritage Management Plan
    - Supply Chain Management Plan
    - Gender Action Plan

- Labour Management Plan
- H&S Plan

- **Guide to Land Acquisition (GLAC);** Summary of land acquisition and resettlement process; entitlements and livelihood restoration measures.
- **Community Brochure,** an introductory guide for all stakeholders who feel impacted by the Project. It contains brief Project data, outlines key E&S effects and focuses on exhaustively explaining ways and means stakeholders as well as all interested parties may participate in the consultation process and initiate dialogue with the Project;
- **Comment Form** is an instrument with which a stakeholder may freely fill with full discretion or anonymity if they so desire and demand satisfactory responses to their Project and ESIA related concerns and comments. Comment forms will be available in two formats, one is a stand-alone A4-sized leaf while the other will be a dedicated page of the ESIA Brochure; and
- **Posters and signage**. Also, to facilitate access to the consultation process, posters, banners at locations (presently their locations are being designated), ample signage to both reading rooms and public exhibitions, etc. are being designed and produced. Public posters will be distributed in public places such as village coffee houses, mukhtar offices and notice boards near sensitive receptors, densely populated residential areas as well as other busy foot traffic locations.

In addition to Turkish versions of all documents, Community Brochure, Grievance Forms and grievance mechanism section of SEP will be printed in Arabic in order to enable the participation into the consultation process of growing populations of displaced peoples.

Hard copies of the ESIA Report will be available at KGM, SPV Office and the EPC Contractor's Office. In addition, hard copies of the ESIA both English and Turkish will be submitted to EBRD Istanbul and Ankara Offices.

7.4.1 Public Consultation Events

Public Consultation Events will be announced in advance on the website, in newspaper advertisements, through the brochures and posters and by elected community leaders (Muhtars) and through public announcements in respective settlements. The same details will be provided in stakeholder letters as well. Full suite of ESIA disclosure documents and supporting printed material will be available for consultation at these public events.

The public consultation events will include:

- Open day exhibitions
- Neighbourhood meetings
- Meetings with women
- Reading rooms at public information offices
- Access to ESIA at Muhtar offices
- NGO Meeting

7.4.1.1 Open Day Exhibitions

The exhibitions will be at each end of the "T-Shaped" alignment. The venues and dates have been defined in Table 7-2 and the following criteria were considered during the selection of exhibition venues and dates:

- Project team have focused on the three end points of the Project because they are the most populous areas, and these locations are the gateways to the Project.

- At the westerly end of the Project, Hadımköy, is an important industrial zone, where the suitable exhibition date is a weekday to allow visits by businesses. Hence, the exhibition there will be on a Thursday.
- In urban character areas, the Project team have designed the exhibitions by clustering the stakeholders in contiguous neighbourhoods, instead of small-scale neighbourhood meetings.
- Başakşehir's market day is a Friday, taking place at an indoor facility. the Project team selected the cultural center directly across the marketplace building where shoppers circulate throughout the day. This convenient location will also accommodate one of our Public Disclosure Offices.
- Başakşehir and Bahçeşehir neighborhoods (both within the Başakşehir district) which are the East and South ends of the Project are the mostly densely populated zones with an urban/residential character.
- Mainly white-collar Bahçeşehir residents crowd the neighborhood's streets on weekends. Hence, the Project team picked a Saturday for the Bahçeşehir exhibition.
- All the venues are accessible.

Table 7-2 Schedule and Locations of Open-Day Exhibitions

District	Location	Date*	Hours
Arnavutköy	Kafe Keyf Tea Garden, Hadımköy (Address: Hadımköy Mahallesi, Ayasofya Cd. No:36, 34555 Arnavutköy/İstanbul)	September	10–00 - 20.00
Başakşehir	Kayaşehir Necdet Yıldırım Info House (Address: Kaybaşı Mahallesi, Kayaşehir Kent Meydanı Rabia Caddesi Boğaziçi Sokak No: 6)	September	
Başakşehir	Bahçeşehir Muhsin Ertuğrul Culture and Arts Centre (Address: Bahçeşehir 2.Kısım Mah. Şehit Polis Gaffar Okkan Cad.No:9 Başakşehir / İstanbul)	September	

**Exact dates of the meetings will be announced to the communities 2 weeks prior to the Open Day Exhibitions.*

Within the exhibition halls, the Project team plan the viewing sequence of the info boards to be arranged such that general information and metrics of the Project are presented in the first few boards. This will be followed by boards that emphasize the rationale of an ESIA process and Project's potential impacts on the ecology and the inhabitants. The flow will continue with info boards that explain the consultation process, the importance of the stakeholder input, and available channels of communication. The tour will end at a desk area where Comments/Grievance Forms may be filled.

7.4.1.2 Community Meetings

These meetings will be held in rural communities, where the residents are mainly low-income households involved in agriculture. The Project team have assessed that they may have difficulty to travel to exhibitions at town centres. Thereby, it was decided to reach out to them by holding individual meetings in each of these communities. All the Community Meetings will be held at accessible village coffee houses.

During Project team's site visits, they have observed the agricultural practices in the rural communities. The EPDC period corresponds to sunflower and canola harvest immediately followed by wheat seeding activities. As the farmers living in rural neighbourhoods are busy in the fields all day, Project team have concurred with Muhtars that the best time of the day would be evening hours in

weekdays. At Şamlar, with the suggestion of Muhtar, Project team decided to hold the community meeting at noon after the Friday prayer when substantial participation can be achieved.

The village coffee shops will be rented for the duration of two-hour meetings. Regarding seating arrangement, the Project team will face the participants at a head table, flanked on both sides with presentation screens.

Table 7-3 Schedule and Locations of Neighbourhood Meetings

District	Neighborhood / Venue	Date*	Hour
Arnavutköy	Deliklikaya Coffee House	September	18.00-20.00
Arnavutköy	Yeşilbayır Coffee House	September	18.00-20.00
Arnavutköy	Sazlıbosna Coffee House	September	18.00-20.00
Çatalca	Nakkaş Coffee House	September	18.00-20.00
Başakşehir	Şamlar Coffee House	September	14.00-16.00

**Exact dates of the meetings will be announced to the communities 2 weeks prior to the Neighbourhood meetings.*

7.4.1.3 Meetings with Women

The Project has engaged Basaksehir Kadin Merkezi (BAKMER) to conduct meetings with women at Selim Kiraz Bilgi Evi (Address: Başak Mahallesi Ertuğrul Gazi Caddesi No: 18/1), and the following Project participants will be present at women meetings:

- Social Manager of SPV;
- A female partner of ACE Consulting;
- E&S Director of SPV (Female); and
- Female managers or specialists to be appointed by KGM.

Apart from Basaksehir, a separate meeting at Kafe Keyf Tea Garden, Hadımköy focusing on the women who live mainly on the rural section of the RoW alignment.

7.4.1.4 Public Information Offices

Five locations that enable maximum participation along the Project route are selected as the points for the placement of Public Disclosure Offices (Reading Rooms) staffed by REC Pusula interns, and on at least three days of the week supported by the Project's HSE assistant specialists.

Four of these locations will be air-conditioned mobile office units that house a desk, adequate space for displaying and reviewing full ESIA document sets and filling and submitting grievance forms. Their locations are mainly a corner of public squares under the control of municipalities that provide power and site safety control. At one location (Hadımköy), the Project team are renting a centrally located store for two months and furnishing it for the purposes of public disclosure. All will be branded with ample high-visibility signage inviting passers-by to consultation. The Public Disclosure Offices will be open to visit 10 am to 8 pm every day except Sundays throughout the disclosure phase.

Once the disclosure is completed, public disclosure offices will be removed. However, Nakkaş Otoyol A.Ş. will setup a permanent Public Information Office around the Sular Valley region to be open during the construction period, and a CLO will be present at this Public Information Office.

Table 7-4 Locations of the Public Disclosure Offices

District	Location
Başakşehir	Mobile office at Entrance of Sular Valley Park (Address: Başak Mahallesi, Sular Vadisi girişi, Fatih Terim Stadyum tarafı, Başakşehir/İstanbul)
Başakşehir	Mobile office at Kayaşehir Fair and Exhibition Area (marketplace) (Address: Kayabaşı Mahallesi Rabia Caddesi, Eflatun Sokak No:1, 34494 Başakşehir/İstanbul)
Başakşehir	Mobile office at Entrance of Başakşehir Millet Kıraathanesi (Address: Kayabaşı mahallesi, Adnan Menderes bulvarı, Başakşehir-İstanbul)
Başakşehir	Mobile office at Entrance of Bahçeşehir Kültür Yaşam Merkezi (Address: Bahçeşehir 1. Kısım Mahallesi Seyhan Caddesi Aksu Deresi Sokak No: 3)
Arnavutköy	Hastane Mahallesi, Koruluk sok. No:37/A, Arnavutköy, İstanbul

7.4.1.5 Muhtar Offices

Muhtar offices will function as access points to ESIA documents and submitting of comments throughout the 60-day period. A field supervisor will visit them weekly to replenish printed ESIA material and collect submitted forms.

7.4.1.6 NGO Meeting

There will be a separate meeting in Istanbul to receive NGOs feedback on the Project and ESIA package. The exact location and timing of this meeting will be announced to the NGOs separately. All the NGOs listed in this SEP will be invited via e-mail invitation, and the e-mail invitation will also include website references where they could review the disclosure documents. The NGOs will also be informed that they could give their feedback via e-mail in case they will not be able to attend physically.

7.4.2 Timelines for Public Disclosure and Consultation

Full suite of ESIA disclosure documents and supporting printed material will be made available for review of stakeholders at the public information centres, Muhktars and Municipal offices listed in the Table 7-5.

Project Documents will be distributed to these disclosure locations prior to the commencement of the official ESIA Disclosure Period to ensure that they are available at least four weeks prior to the first consultation meetings and that stakeholders have sufficient time to review the documentation prior to the disclosure meetings. These documents will also be available on the Project website.

Table 7-5 ESIA Disclosure Activities

Tool/ Event / Activity	Date
PLANNING	
Planning and preparation phase ▪ Needs-assessment visits ▪ Arranging meeting venues ▪ Defining locating points for printed ESIA disclosure documents ▪ Logistics of accessibility ▪ Preparation of the Public Information Centres ESIA documents ▪ Assessing quantities ▪ Text and design (ESIA Brochure, GLAC, Posters, Ads, Info boards) ▪ Print works Arrangement of meeting venues ▪ Venues agreed with municipalities and mukhtars ▪ Timings concurred with Mukhtars and project affected people	Until ESIA Public Disclosure
INFORMATION DISCLOSURE	
The 60-Day Public Disclosure and Consultation Phase officially begins	**D-Day**
Public notices published in national and local newspapers	
Launch of Disclosure Period is announced on Lenders' websites with link to Project website.	
Project telephone hotline (0 800 655 10 00) is operational	
Project Website containing ESIA documents and online Comment Form is up and running (http://www.nakkasotoyolu.com/tr/csys)	
Public Information Centres are open to visit, review the ESIA package and submit comments: ▪ ESIA documents, submission boxes and posters are available at access points, ▪ Public Information Centers: ▪ Municipalities (Basaksehir, Arnavutköy, Catalca and Avcilar): ▪ at the following Muhtar offices: - Bahçeşehir 1 (Tatarcık) - Şamlar - Şahintepe - Kayabaşı - Güvercintepe - Başak - Başakşehir - Deliklikaya - Hadımköy - Hastane - Ömerli - Sazlıbosna - Yeşilbayır - Nakkaş - Ispartakule (Tahtakale)	

Tool/ Event / Activity	Date
Project brief (NTS) with an invitation letter is sent to stakeholders through emails, post office, or direct distribution to PAPs prior to or during disclosure meetings. Household in the villages will be able to receive the NTS and the invitation letter from Muhtar offices. There will be announcements via mosques and coffeehouses for the villagers on how to receive the NTS and invitation letters.	
ESIA DISCLOSURE MEETINGS	
1st Open-Day Exhibition – Başakşehir Necdet Yıldırım Info House, (Pending final approval of date from Başakşehir Mun.)	Approximately 4 weeks after Public Disclosur[e]
2nd Public Exhibition (Open Day) – Bahçeşehir Muhsin Ertuğrul Culture and Art Centre, (Pending final approval of date from Başakşehir Mun.)	Approximately 4 weeks after Public Disclosur[e]
3rd Public Exhibition (Open Day) - Cafe Keyf Tea Garden, Hadımköy)	Approximately 4 weeks after Public Disclosure
Five Village level meetings in the following neighbourhood: ▪ Deliklikaya ▪ Sazlibosna ▪ Yesilbayir ▪ Nakkas ▪ Samlar	Approximately 4 weeks after Public Disclosure
Periodic collection of comments from submission boxes at 22 points (17 at Muhtar offices and 5 at Public Information Centres)	Weekly
60 days Public Disclosure and Consultation submission period officially ends	Will be determined
Public Consultation and Disclosure report is prepared	Within 5 weeks of the Public Disclosure
Public Disclosure and Consultation Report is released to the public on the Project website.	The day the final report preparation is approved.
Stakeholder engagement will continue after disclosure as described in this SE, contact means available as presented in the Grievance Form.	Ongoing throughout the lifetime of the project

The ESIA package including this SEP, RAP and management plans will be updated (if required) after the disclosure process based on stakeholders' comments and feedback. The final ESIA and management plans will be disclosed at the Project website throughout the lifetime of the project.

An ESIA Disclosure and Consultation Report will be developed and disclosed at the end of the ESIA disclosure period which will include feedback received during disclosure and Project's responses to the issues raised. It will also include a section to describe whether any revision is required in the ESIA and management plans and what revision is made in the final ESIA package.

After disclosure process, the Project will continue to engage with project affected people during pre-construction, construction and operation phases as defined in Chapter 8.

Any future consultation events will be announced in advance at the website, through announcements, posters distributed to communities and Mukhtars in respective settlements.

7.5 Consultation Meetings for Future Land Acquisition and Resettlement Activities:

Consultation meetings are aimed at engaging with Project Affected population (PAPs), comprising individuals, households and businesses that will be affected by the land acquisition and construction activities. These meetings will be organized during the planning phase, for information disclosure and RAP activities, and prior to and during construction phase, on a needs basis, at places decided on mutual agreement of both interacting parties and may comprise of options like property of land owners, Project office, open areas near Project locations, or village level gathering points.

7.6 Key Stakeholder Engagement During Pre-Construction Phase

Nakkaş Otoyol A.Ş is responsible for driving the engagement with stakeholders at various stages of the Project and will organise various meetings for different stakeholder groups. Whilst some of the broad engagement activities with their objectives are enlisted below, the type and number of engagements will depend on the availability of stakeholders for engagements.

- **Information meetings with affected communities, affected businesses and local authorities prior to construction:** Each community, affected businesses and local authorities will be visited and consulted on upcoming construction activities prior to construction team's entry to the village, business locations. These meetings will comprise sharing of Project construction activities and timeline with stakeholders. During these meetings, information linked to Project footprint, potential impacts and mitigations will be discussed, contact details of Project personnel will be disclosed again to the affected people and with authorities. Provisions of Grievance Mechanism (GM) for the Project will also be disclosed and explained to the participants. The participants will be able to present their opinions and remarks with regards to the Project, as well as to suggest possible solutions of the issues raised, which will be documented and addressed in a timely manner in line with the SEP of the project.
- Separate meetings for men and women from the nearby community will be conducted to ensure that stakeholder engagement is gender inclusive. It will be ensured that representatives from vulnerable households are also covered as part of the public meetings.

7.7 Stakeholder Engagement during Construction Phase

Stakeholder engagement will take place regularly during construction phase, to inform stakeholders on the advancement of the Project related activities. Specific information about activities to be conducted will be communicated to the stakeholders in advance through CLOs.

Stakeholders will be informed about the description and timeline of planned activities, the work progress and schedule; the approximate number of workers on site, any diversions or access issues and the health and safety risks associated with the activities and the mitigation measures planned to control those risks, as applicable. Regular updates will be provided to stakeholders to inform them on the evolution of the Project related activities and of any significant change to the Project planning.

During the construction phase, the Project team will maintain open a communication channel with stakeholders to allow them to share any relevant feedback about the ongoing works and raise any concerns. The grievance mechanism will be maintained during the construction phase by Nakkaş Otoyol A.Ş. It will be regularly reviewed to ensure it is appropriately capturing and closing out community grievances and is fit for purpose.

EPC Contractor will be required to sign land entry and exit protocols with PAPs prior to and after they complete the works to ensure no issues left behind.

The SEP will be updated annually based on the project needs.

7.8 Future Stakeholder Engagement Activity Plan

Nakkaş Otoyol A.Ş and EPC Contractor will be responsible for engaging with different stakeholders to keep them informed about the construction activities and seek their feedback or concerns.

Periodic interactions with various stakeholder groups will be guided by the Stakeholder Engagement Activity Plan, as detailed in Table 7-6. The EPC CLOs will be responsible for maintenance of records of interactions along with details of the stakeholders, for all meetings conducted during the Project lifecycle.

Table 7-6 Future Stakeholder Engagement Activity Plan

Stakeholder	Information to be Disclosed/ Discussed	Engagement Method and Tools	Venue	Timeframe	Frequency	Responsibility
MoTI – General Directorate of Highways (KGM)	▪ To exchange information and build understanding and consensus on the RAP implementation ▪ To establish implementation responsibilities and coordination mechanism related to RAP implementation.	▪ Through digital and/or hard copies (in the format requested by the authority) ▪ Face to face meetings ▪ RAP (in Turkish) ▪ GLAC (in Turkish) including a non-technical summary of entitlements and processes ▪ Presentation of the key RAP findings (in the format to be requested by the authority)	▪ KGM (Ankara) ▪ SPV headquarter offices. ▪ Project website	Prior to Land Acquisition (incl. Disclosure Period) During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Multiple times prior to Disclosure as necessary. Monthly	▪ Senior Project Management ▪ SPV Deputy General Manager / PIU Coordinator ▪ SPV HSSE Director
1st Regional Directorate of KGM	▪ Same as above	▪ Same as above	▪ 1st Regional Directorate of KGM (Istanbul) ▪ Project site offices	Prior to Land Acquisition (incl. Disclosure Period) During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Multiple times prior to Disclosure as necessary. Weekly (minimum)	▪ Senior Project Management ▪ SPV Deputy General Manager / PIU Coordinator ▪ SPV Social Manager ▪ SPV Expropriation Chief
Muhtars	▪ To inform PAPs through the settlement heads about the Project, construction schedule, land entry processes, the RAP study and the Project grievance mechanism ▪ ▪ To ensure timely evacuation of expropriated parcels and implementation of the Project as per the planned schedule	▪ Through digital and/or hard copies distributed to the offices of the settlement heads and other public places as appropriate ▪ Face to face meetings in 15 settlements affected by land acquisition ▪ RAP (in Turkish) ▪ GLAC (in Turkish) including a non-technical summary of entitlements and processes ▪ Expropriation lists ▪ Information on engineering structures designed to ensure access between parcels to be fragmented due to Motorway	▪ Project website ▪ Project site offices ▪ Offices of the settlement heads or other mutually agreed locations in 15 settlements affected by land acquisition	Prior to Land Acquisition (incl. Disclosure Period) During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	At least one meeting prior to disclosure and one meeting prior to land notifications Monthly	▪ Social Manager ▪ Deputy Social Manager ▪ SPV Expropriation Chief ▪ Project CLOs
Owners/ shareholders (incl. heirs of the parcels) of the lands and assets subject to expropriation by KGM (Note: this group may include the physically and economically displaced PAPs as well as women and vulnerable persons which are covered in separate rows below)	▪ To support KGM throughout the land acquisition process and ensure adequate identification and information of PAPs (incl. heirs of the parcels), increase participation in the negotiation meetings to be held between KGM and PAPs, and increase the consent (agreement in line with Article 8) and reduce the number of court processes (in line with Article 27 followed by Article 10)	▪ Face to face meetings with owners/ shareholders (incl. heirs of the parcels) residing in the affected settlements and in Istanbul or phone calls with owners/ shareholders (incl. heirs of the parcels) who reside outside Istanbul or Turkey (currently the SPV anticipates around 3,850 different owners/shareholders), which would increase with the identification heirs of the parcels ▪ Through digital and/or hard copies of materials distributed directly to PAPs ▪ Official invitation letters sent by KGM to owners/ shareholders ▪ GLAC (in Turkish) including a non-technical summary of entitlements and processes	▪ Offices of the settlement heads and public places (e.g., coffee/tea houses, other mutually agreed locations) in 15 settlements	Prior to Land Acquisition (incl. Disclosure Period) During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	All heirs will be identified and invited for negotiations and they will be supported through RAP fund during expropriation process Regular meetings with PAPs at each stage of the RAP implementation process. In case of disagreement, one-off prior to filing of Article 27 court cases and another meeting whenever the court decisions are executed and land seizure values and final expropriation fees are deposited to the Bank accounts of the PAPs.	▪ SPV Social Manager ▪ SPV Deputy Social Manager ▪ SPV Expropriation Chief ▪ Project CLOs
Households (PAPs) affected by physical displacement	▪ To inform PAPs about Project, construction schedule, land entry processes, the RAP study and the Project grievance mechanism	▪ Face to face meetings (*) with 8 households to be physically displaced ▪ Through digital and/or hard copies distributed directly to PAPs	▪ Residences of the affected PAPs or other mutually agreed locations in Basak, Kayabasi, Nakkas, Sahintepe, Sazlibosna, Yesilbayir neighbourhoods	Prior to Land Acquisition (incl. Disclosure Period)	At least one-off with each PAP during Disclosure Period or prior to start of land acquisition based on Updated Valuation (whichever is earlier)	▪ SPV Social Manager ▪ SPV Deputy Social Manager ▪ SPV Expropriation Chief

Stakeholder	Information to be Disclosed/ Discussed	Engagement Method and Tools	Venue	Timeframe	Frequency	Responsibility
		▪ GLAC (in Turkish) including a non-technical summary of entitlements and processes		During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Weekly at the Resettlement stage and then monitoring visits on monthly basis until they are settled.	▪ Project CLOs
Households (PAPs) affected by economic displacement	▪ To inform PAPs about the Project, construction schedule, land entry processes, the RAP study and the Project grievance mechanism	▪ Public hearings in 15 settlements (to be held as part of ESIA disclosure) ▪ Face to face meetings (*) with 80 agricultural users/crop producers – incl. formal and informal) users (individually or in groups as appropriate). ▪ Face to face meetings with users of fragmented grazing lands in Kayabasi and Sahintepe (ca. 20 users in Kayabasi and Sahintepe as identified (individually or in groups as appropriate). ▪ Through digital and/or hard copies distributed directly to PAPs ▪ GLAC (in Turkish and English) including a non-technical summary of entitlements and processes	▪ Offices of the settlement heads and public places (e.g., coffee/tea houses, other mutually agreed locations) in 15 settlements ▪ Project website ▪ Project site offices	Prior to Land Acquisition (incl. Disclosure Period)	At least One-off with each PAP during Disclosure Period or prior to start of land acquisition based on Updated Valuation (whichever is earlier)	▪ SPV Social Manager ▪ SPV Deputy Social Manager ▪ SPV Expropriation Chief ▪ Project CLOs ▪ SPV Agricultural Development Expert
				During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Weekly at the Resettlement stage and then monitoring visits on monthly basis until they are settled.	
Vulnerable PAPs (incl. households with vulnerable members) and Women PAPs	▪ To ensure information of and engagement with the vulnerable PAPs and women about the Project, construction schedule, land entry processes, the RAP study and the Project grievance mechanism	▪ Face to face meetings ▪ Individual meetings with 3 physically displaced households with vulnerabilities and women members (among 8 physically displaced households) ▪ Individual or group meetings (as appropriate) with 17 vulnerable agricultural users (inc. vulnerable household members) among 23 economically displaced households plus any additional vulnerable users that would be identified during RAP implementation	▪ Residences of the affected PAPs or other mutually agreed locations in 15 settlements	Prior to Land Acquisition (incl. Disclosure Period)	At least One-off with each PAP during Disclosure Period or prior to start of land acquisition based on Updated Valuation (whichever is earlier)	▪ SPV Social Manager ▪ SPV Deputy Social Manager ▪ SPV Expropriation Chief ▪ Project CLOs
				During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	▪ Weekly	
Affected Businesses	▪ To inform affected businesses (employers and direct/contracted employees) about the Project, construction schedule, land entry processes, the RAP study and the Project grievance mechanism	▪ Through digital and/or hard copies distributed directly to PAPs ▪ Face to face meetings ▪ 14 employers (incl. owners and tenants of the affected businesses ▪ 243 employees (female and male formal and informal employees including 66 female and male employees with vulnerabilities including migrant workers and others) ▪ GLAC (in Turkish and English) including a non-technical summary of entitlements and processes	▪ Affected business locations or other mutually agreed locations	Prior to Land Acquisition (incl. Disclosure Period	At least One-off with each PAP during Disclosure Period or prior to start of land acquisition based on Updated Valuation (whichever is earlier)	▪ SPV Social Manager ▪ SPV Deputy Social Manager ▪ SPV Expropriation Chief ▪ Project CLOs ▪ SPV Business Development Expert
				During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Resettlement stage and then monitoring visits on monthly basis until they are settled.	
Lenders	▪ To inform/update the Lenders about RAP and Project progress	▪ Reports ▪ Face to face meetings ▪ E-mail correspondence ▪ Telephone calls ▪ Annual reporting to Lenders ▪ Periodical E&S Monitoring Reports during construction and operation	▪ Project website (www.nakkasotoyolu.com/) ▪ Project site offices ▪ Other locations, as appropriate ▪ Virtual	Prior to Land Acquisition (incl. Disclosure Period	Weekly meetings and on demand	▪ Senior Management Team ▪ SPV HSSE Director ▪ SPV Social Manager ▪
				▪ During Land Acquisition and Post Resettlement Phases (incl. RAP Implementation Period)	Lenders advisers monitoring visits as per the ESAP. External Independent RAP Monitoring Consultant and Internal RAP Monitoring Consultant's monitoring visits	
Contractors and sub-contractors	▪ Information dissemination, including information regarding labour laws, local employment opportunities, safety measures and discussion on grievances; ▪ For negotiation on contract clauses as per requirements stated in ESIA and Management plans for the Project;	▪ Signed contracts with requirement to implement the ESMMP[16] ▪ Meetings and monthly reporting in the operations phase; ▪ Documentation as agreed in the contract	▪ Not applicable	▪ Construction Phase	▪ Daily and weekly communication with contractors and sub-contractors	▪ SPV ▪ EPC Contractor

[16] Environmental and Social Management and Montiroing Plan (ESMMP) is the outcome of the ESIA, where all the suggested Mitigation actions are summarized in a table, along with responsibilities, monitoring indicators and timelines.

Stakeholder	Information to be Disclosed/ Discussed	Engagement Method and Tools	Venue	Timeframe	Frequency	Responsibility
Potential workers to be engaged for the construction phase of the Project	▪ Advertising of job vacancies for the Project at village level; ▪ Induction on Code of Conduct and Grievances Redress Mechanism (GRM)	▪ Website ▪ Leaflet and brochure distribution ▪ Local media and Newspaper Advertisements ▪ Advertisement boards in community hotspots ▪ Through face-to-face discussion at the time of hiring for construction phase	▪ Not applicable	▪ Construction Phase	▪ Weekly communication with workers ▪ Quarterly Labour interviews as part of labour audit	▪ SPV ▪ EPC Contractor
Regulatory Authorities at National or Provincial levels	▪ Information and documents related to permits and applications required ▪ ESIA Information ▪ Other general Project information, as applicable	▪ Letters and official correspondences ▪ Provision of other disclosure documents for information ▪ Meetings	▪ Not applicable	▪ Public Disclosure ▪ Construction Phase	▪ Regular communication with relevant authorities for permitting issues and coordination of project works	▪ SPV ▪ EPC Contractor ▪
District Level Authorities and Local Public Institutions	▪ Information and documents related to permits and applications required ▪ ESIA Information ▪ Other general Project information ▪ Employment opportunities	▪ Letters and official correspondences ▪ Provision of other disclosure documents for information ▪ Leaflet, brochure, and poster distribution to be available in offices ▪ Meetings ▪ Notices of hiring in district İşkur systems	▪ Not applicable	▪ Public Disclosure ▪ Construction Phase	▪ Regular communication with relevant authorities for permitting issues and coordination of project works	▪ SPV ▪ EPC Contractor ▪
Muhtars	▪ Project information (ESIA, Non-technical summary, SEP, Project updates, stories, news, visuals) ▪ Communication of Community H&S measures, announcements, restriction notifications. ▪ Grievance Mechanism related information ▪ Employment and procurement opportunities ▪ Land acquisition and Resettlement specific information ▪ Discussion on Community engagement or development related activities	▪ Leaflet and brochure distribution, posters handed to be available in offices ▪ Letters for specific information on community H&S, traffic management, employment and procurement opportunities ▪ Face to Face discussions ▪ WhatsApp groups for continuous liaison ▪ Emailing and SMS ▪ Surveys of RAP development including online survey tools ▪ Brochures on process, rights and complaints to be sent to landowners/entitled people ▪ Complaint forms (online/boxes in identified places/available within Project vehicles), telephone lines.	▪ Muhtar Offices	▪ Construction Phase	▪ Monthly and ad hoc upon demand pf Muhtars	▪ SPV ▪ EPC Contractor ▪
Civil Society/Local NGOs	▪ Project information (ESIA, Non-technical summary, SEP, Project updates, stories, news, visuals) ▪ Grievance Mechanism related information	▪ Website ▪ Leaflet and brochure distribution ▪ Letters on Project information as cover or letters for EISIA comment ▪ Complaint forms (online/boxes in identified places/available within Project vehicles), telephone lines ▪ Meetings	▪ Public Information Centres owned by Sponsors	▪ Construction Phase	▪ Quarterly and ad hoc upon demand of NGOs	▪ SPV ▪ EPC Contractor
Chambers, business associations as well as cooperatives and unions and industrial zone management	▪ Project information (ESIA, Non-technical summary, SEP, Project updates, stories, news, visuals) ▪ H&S, restrictions related information ▪ Employment and Procurement and Service provision opportunities ▪ Grievance Management	▪ Website ▪ Leaflet and brochure distribution/mailing ▪ Letters on Project information or letters for ESIA disclosure, ▪ Procurement opportunities as well as information on H&S, traffic management and other impact control measures. ▪ Emailing and online meeting tools ▪ Complaint forms (online/boxes in identified places/available within Project vehicles), telephone lines. ▪ Meetings	▪ Not applicable	▪ Construction Phase	▪ Quarterly and ad hoc upon demand	▪ SPV ▪ EPC Contractor

Stakeholder	Information to be Disclosed/ Discussed	Engagement Method and Tools	Venue	Timeframe	Frequency	Responsibility
Local Media outlets	▪ Project information that needs to be communicated to the local community, comprising H&S, restrictions related information, Employment and Procurement and Service provision opportunities	▪ Official Letters	▪ Not applicable	▪ Construction Phase	▪ Once during disclosure and when required during construction	▪ SPV ▪ EPC Contractor
Project Affected Persons due to severance	▪ Additional underpasses requirements if necessary to ensure that no severance will occur.	▪ Meetings	▪ Neighbourhood Coffeehouses ▪ Municipality Information Centre ▪ Public Information Centres owned by Sponsor	▪ Planning Phase	▪ Once when required	▪ SPV ▪ EPC Contractor
Project Affected Persons due to blasting	▪ Blasting will be conducted according to a consistent timetable agreed with the stakeholders who may be affected. If changes to the blasting timetable occur, nearby communities will be immediately informed of those changes.	▪ Meetings	▪ Neighbourhood Coffeehouses ▪ Muhtar Offices ▪ Schools	▪ Prior to blasting	▪ Once prior to blasting activities, and min once after blasting to ensure no issues faced.	▪ SPV ▪ EPC Contractor
Project Affected Persons due to construction related hazards	▪ Awareness training communities of trespassing onto sites, the meaning of signs, the risks of playing on or near equipment or entering fenced areas.	▪ Meetings ▪ Leaflet and brochure distribution/mailing	▪ Neighbourhood Coffeehouses ▪ Muhtar Offices ▪ Schools	▪ Prior to construction	▪ Weekly meetings during construction	▪ SPV ▪ EPC Contractor

7.9 Stakeholder Engagement during Operations Phase

At the end of the construction phase, the responsibility for operating and maintaining the Motorway will be transferred to the O&M contractor for the Project. Nakkaş Otoyol A.Ş will be responsible to develop a SEP for operations phase including an update of the list of key stakeholders (presented in Appendix A which will be updated based on the new stakeholders that will be identified during construction) along with the O&M contractor, during the entire operations phase. The operations phase SEP and list of key stakeholders will be disclosed before the operational acceptance takes place.

During the operation phase, Nakkaş Otoyol A.Ş will have the responsibility for managing communication on Project activities and associated grievances, along with the O&M contractor. The updates on Project related activities can be periodic or ad-hoc, depending on any maintenance activities planned to be conducted on the motorway that would lead to traffic jams, diversions, etc. Specific details related to Project activities during operations phase will start emerging towards the end of Construction phase and will be captured as part of the SEP that will be developed for operations phase. Ongoing Stakeholder Engagement Activities during operations

The Project is committed to continuous engagement with stakeholders throughout the life of the Project. Plans and activities implemented during the next stages of Project planning, development and operation will therefore feed into and inform on-going stakeholder engagement as the Project moves into these stages, ensuring that two-way dialogue with those affected, both positively and negatively by the proposed Project is maintained.

The aim will be to ensure that the Project remains in contact with all interested parties and cognisant of their concerns, and that these are addressed in an effective and timely manner.

Ongoing engagement activities will cover the following:

- Progress updates of Project activities, scheduling and monitoring;
- Changes (if any) in project description or project activities;
- Updates of employment/ procurement opportunities and processes;
- Updates on grievance registrations and resolutions;
- Continued engagement starting from onboarding workers/employees throughout project lifetime with Workers representatives, biweekly meetings held with Workers Representatives;
- Constant communication flow and reporting between EPC and subcontractors; and.
- Communication between SPV and EPC teams on a weekly basis.

8. GRIEVANCE MECHANISM

8.1 Introduction

A grievance is considered to be any complaint or comment (including questions/ suggestions) about the way a Project is being implemented. During the Project lifecycle, there may be several instances of conflicts, allegations and dissatisfaction due to Project related activities raised by stakeholders.

Grievance management is an important component of any Project's implementation and is driven by well-Grievance Mechanism (GM), the communication of this GM and its provisions to key stakeholders, mechanisms for recording, tracking and monitoring of incoming grievances and defined roles and responsibilities linked to implementation of this system.

The GM may also need to include an appeal mechanism which is a process triggered if the complainant is not satisfied with resolution of the complaint. Further explanations on the appeal mechanism can be found in Chapter 8.4.1 below.

Nakkaş Otoyol A.Ş will set up Project specific Grievance mechanisms (GM) which includes the following key components:

- Consideration of both external[17] and internal[18] stakeholders' grievances;
- Consideration of an appeal mechanism if complaints cannot be resolved at the project level grievance mechanism including senior managers from Sponsors/Corporate representatives, local authorities and issue specific experts. Mediators/facilitators to be hired if needed to resolve the issue;
- Integration of specific Gender Based Violence and Harassment (GBVH) provisions to manage grievances linked to GBVH (e.g., separate channel for GBVH related grievances and GBVH focal points to be trained and assigned to address all GBVH grievances);
- Defining the timeframes for acknowledgement of the receipt of complaints and subsequent resolution; and
- Practical arrangements for maintaining confidentiality, reviewing and resolving grievances, including resources and organisational arrangements and taking measures to avoid any form of retaliation towards complainants.

8.2 Principles

The Grievance Mechanism specific to the Project will be developed with the following aims:

- To address concerns promptly and effectively, in a transparent manner that is culturally appropriate, free from manipulation, interference, coercion, intimidation and retribution, and readily accessible to all affected parties, at no cost;
- To ensure handling of grievances in a culturally appropriate manner and be discreet, objective, sensitive, and responsive to the stakeholders' needs and concerns; and
- The mechanism will not prevent access to judicial or administrative remedies.

The key components of the **Grievance redress mechanism** that aid in upholding the principles of Grievance Management are:

- Respond in a timely manner;
- Proportionate to project risks and potential adverse impacts;

[17] External stakeholder comprise fence line community, Project-affected households (PAHs) due to land acquisition, and other relevant parties that may be affected due to Project operations.

[18] The internal stakeholders comprise the employees and workers engaged by the Project, its contractors and subcontractors, for activities linked to the Project.

- Transparent manner that is culturally appropriate, discreet, responsive to stakeholder needs and concerns;
- Free from manipulation, interference, coercion, intimidation and retribution;
- Readily accessible at no cost;
- Not prevent access to judicial or administrative remedies;
- Inform stakeholders about the grievance mechanism;
- Report on implementation of grievance mechanism;
- Protect privacy of affected individuals;
- Allow for anonymous grievances;
- Provision of mediation for resolution of grievances where significant community concerns;
- Monitoring and analysis of trends; and
- A project level appeal mechanism where complainants do not accept ' project's proposed resolution may be required.

8.3 Institutional Set up

Overall GM will be managed by EPC Community Liaison Officers (CLOs) on a daily basis who will be reporting directly to EPC E&S Manager. Nakkaş Otoyol A.Ş. and EPC Contractor will integrate the requirements of the GM into Contracts, Subcontractors Contracts and Suppliers Contract to ensure that GM is consistently implemented in line with Project requirements with adequate resources.

A Project level Grievance Committee (GC) will be established, to oversee the process of GM being implemented. Its primary responsibility is to periodically review the grievances raised by the internal and external stakeholders. The GC will review the responses being shared with external stakeholders in an attempt to resolve non-judicial disputes arising out of various matters related to the Project. The GC will be driven internally by the Project team and will have representation from the following teams to for the solution to the grievances:

- Nakkaş Otoyol A.Ş. Senior Management;
- Nakkaş Otoyol A.Ş. Social Manager;
- Construction Manager/Project Manager;
- EPC Senior Social Expert;
- Resettlement Expert and
- Community Liaison Officer (CLO - additional female CLO will be assigned to the Project).

The GC will be led by the Nakkaş Otoyol A.Ş. Senior Management and will comprise at least one (preferably more) female members. The presence of female members in the Grievance Committee will ensure that the mechanism is easy to access and responds well to the grievances and concerns of all genders and members of vulnerable groups in the area that may be impacted due to the Project, as well as that sensitivities linked to GBVH are addressed in a fair and equitable manner.

There may be nominated members from the local Governance bodies (e.g., Mukhtars, soil experts/agricultural experts from the local governorate of agriculture) or senior representative from the EPC Contractor/ Sub contractor added to the Committee in specific cases, where any other concerned person with decision making authority in relevance to the grievance or aggrieved party needs to be involved.

The grievances received from the external government agencies, or other institutional stakeholders e.g., Istanbul Municipality or other similar bodies will also be dealt with using this mechanism. In

cases where the issues will appear too complex to solve at the Project level or GC level, a decision to involve the legal team of Nakkaş Otoyol A.Ş, will be made by the Senior Management.

The grievances received by KGM via CIMER and official letters will be submitted to Nakkaş Otoyol A.Ş. for review and action if it is about construction. Nakkaş Otoyol A.Ş. will review the content of the grievance, contact the owner of the grievance to get further information if needed. Based on the evaluation, Nakkaş Otoyol A.Ş. will take action and inform both the owner of the grievance and KGM accordingly. In case the grievance is beyond Nakkaş Otoyol A.Ş.'s responsibility such as land acquisition, major design change requests by the authorities, etc. KGM will take action and inform the owner of the grievance about the result.

The Project Company has the overall assurance role to ensure RAP is implemented in line with the lender requirements. Although land acquisition and resettlement related grievances submitted to the expropriation department of KGM will be recorded and managed directly by the KGM PIU team, The list of these grievances and actions for closure by KGM will be shared with the Nakkaş Otoyol A.S on weekly basis. The Project Company will monitor effective closure of these complaint and take actions if needed to close the gaps between Turkish expropriation law and practices and the lender requirements. The Project Company will submit the progress on complaints to the Lenders on regular basis.

8.4 Key steps of Grievance Mechanism

The figure below explains the Grievance Redress process developed to ensure an effective and timely response to community complaints and maintain good community and stakeholder relations.

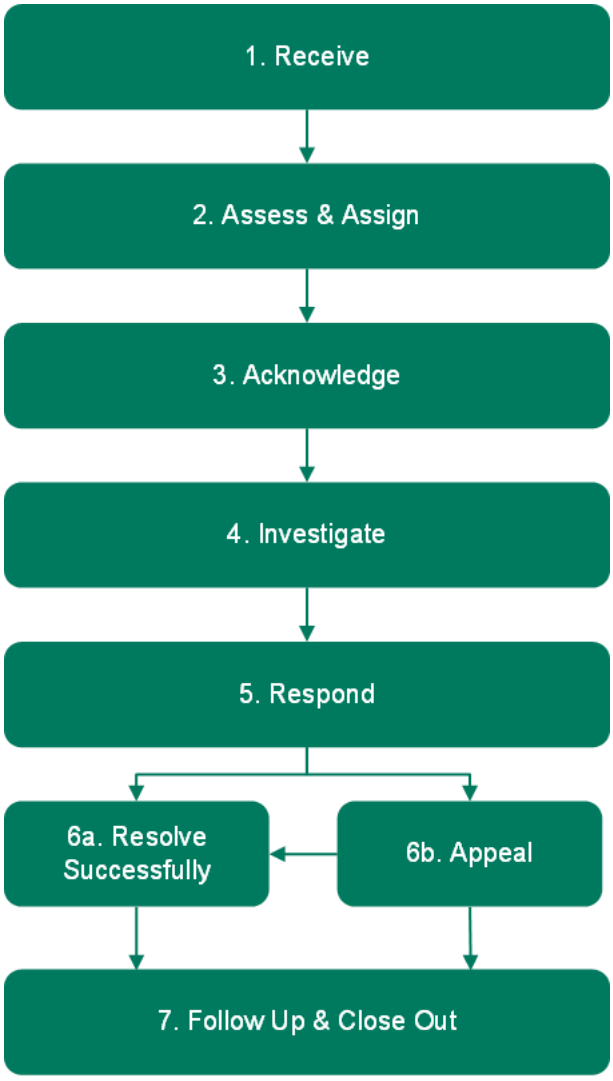


Figure 8-1 Grievance Redress Mechanism

8.4.1 External Grievance Redress Mechanism

The external Grievances Redress Mechanism will be comprehensively documented and displayed at relevant locations at the Project office and made available on the Project website. The key steps linked to the External GRM are described below.

1. **Receipt of grievance:** The grievances may be submitted through various mediums, comprising the following:
    - Face to face/Walk in during meetings;
    - In written form by mail to the address (Address: Şahintepe Mah. Muratdere Cad. KMO Şantiye No: 134/2 Başakşehir/İstanbul) displayed by the Project;
    - Online – through Project website (www.nakkasotoyolu.com) and via e-mail info@nakkasotoyolu.com;
    - Through Grievance forms that will be distributed to affected people during consultation meetings; and comment boxes to be inserted at community centres; and
    - Through a toll-free phone line as set up by Project.

The grievance is recorded and classified in the 'Grievance Register' (written and electronic) by the designated CLO. Separate Grievance Registers will be maintained for Internal and External Grievances at the Project office, for easy tracking.

The complainants may also prefer to use the national and regional complaint mechanisms including:

- Presidency of the Republic of Turkey - Directorate of Communications (CIMER) Portal and free lines "Alo 150";
- Istanbul Metropolitan Municipality Portal (Beyaz Masa) and free lines Alo 153; and
- KGM Online Grievance Mechanism (Şikayet Bildirimi (kgm.gov.tr).

2. **Assess and assign**: The CLO defines the timelines for an investigation and any follow up actions. For complaints regarding issues for which a more appropriate company process already exists, the CLO shall refer the matter to the appropriate process owner for further action. This will typically be the case for Complaints related to contractual or commercial issues; industrial relations and employee relations; business integrity or criminal matters; and issues subject to current or pending litigation. The CLO updates the Complaint Record as appropriate.
3. **Grievance is formally acknowledged** through a personal meeting, phone call, or letter as appropriate, within three (3) working days of receipt of grievance by Project. If the grievance is not well understood or if additional information is required, clarification shall be sought from the complainant during this step.
4. **CLO delegates the grievance** in writing to the relevant department/ contractor/personnel of the Project for preparation of an appropriate response. CLO will estimate the subject matter of this grievance and identify the risk category. If required, the grievance may be sent for consideration of the senior management.

   A response is developed by the specific team related to the grievance and CLO with input from the Senior Management and others, as necessary. The GC may be involved depending on the complexity of the grievance or if the evaluation needs opinion on specific matters.

   Required actions are implemented to deal with the issue, and completion of these is recorded on the grievance register. The response is signed-off by the CLO. The sign-off may be a signature on the grievance register or any written or email correspondence with the complainant which shall be filed with the grievance to indicate agreement.
5. **The response is communicated to the affected party** within 7 working days in case of easy to resolve grievances. For other grievances where issues are complex and additional stakeholders like Senior Management or GC is involved (as suggested in Step 4), the response will be communicated to the aggrieved in 30 working days from the receipt of the grievance. The CLO ensures that a suitable approach to communicating the response to the affected party is agreed and implemented after approval from senior management/ GC, as applicable.

   The response of the complainant on the resolution communicated is recorded to help assess whether the grievance is closed or whether further action is needed. The CLO shall use appropriate communication channels, most likely telephone or face to face meeting, to confirm whether the complainant has understood and is satisfied with the response. The complainants' response shall be recorded in the grievance register and ideally, both parties shall sign off the grievance to confirm closure.

6(a). **The grievance is closed** with sign-off from the CLO, who determines whether the grievance can be closed or whether further attention and action is required. If further attention is required, the CLO shall re-assess the grievance and then take appropriate action. Once the CLO has assessed whether the grievance can be closed, he/she will sign off to approve closure of the grievance on the grievance register and/or by written communication. This has to be done using the grievance close out form to justify that a grievance raised has been addressed, that

measures/actions have been taken and that the issue is finally resolved. The grievance closeout form is attached in Appendix B. Closing the grievance with a form does not suffice on its own but other documented evidence needs to be annexed to the close out form to showcase the process undertaken and any documents to prove the grievance was resolved. Such evidence can include receipts, bank statements, photographs, official letters, decisions of certain commissions that carry out appraisal etc.

6(b). Appeal system: If actions taken on a grievance are not resolved to the satisfaction of the complainant, the Grievance Committee (GC) consisting of the following members will consider and as necessary initiate an appeal mechanism.

- SPV Deputy General Manager;
- SPV Social Manager – RAP Fund Execution Representative;
- SPV Agricultural Development Expert;
- SPV Business Development Expert;
- SPV Expropriation Chief;
- SPV Independent Expropriation and Valuation Expert;
- EPC Senior Social Expert;
- KGM Chief Engineer:
- KGM Expropriation Chief; and
- 3rd Party Experts based on the nature of the conflict.

There may be nominated members from the local Governance bodies (e.g., Mukhtars, soil experts/agricultural experts from the local governorate of agriculture) or other senior representative from the EPC Contractor/ Sub contractor added to the Committee in specific cases, where any other concerned person with decision making authority in relevance to the grievance or aggrieved party needs to be involved. The grievances received from the external government agencies, or other institutional stakeholders e.g., Istanbul Municipality or other similar bodies will also be dealt with using this mechanism.

GC depending on the subject/type of the grievance, etc. may be reported as independent mediators as appropriate in order to facilitate grievance resolution to the satisfaction of both parties. These parties may be included in the GC of the Project on a needs-basis. The objective of this mechanism will be to review responses being shared with external stakeholders to resolve non-judicial disputes arising out of various matters related to the Project. The SPV will take the actions to be advised by the independent mediator. Having this mechanism in place, a stakeholders may still further pursue external remedies, including legal action, in accordance with the existing legislation of Türkiye as the Project Grievance Mechanism will not prevent access to judicial or administrative remedies.

Cases that require further legal investigation or other parties' involvement` a decision to involve the legal team of Nakkaş Otoyol A.Ş, will be made by the Senior Management.

7. Follow-Up and Close Out: A Grievance is closed out when no further action can be or needs to be taken. The CLO is responsible for updating the Grievance Log and the logistics associated with closing out the case. At the end of a case, regardless of whether agreement was achieved, the CLO will seek feedback from the Complainant on their level of satisfaction with the complaint handling process and its outcome.

External / National Grievance Mechanisms:

The stakeholders are encouraged to use the project level grievance mechanism for quick and efficient solution. However, they may also prefer to use the national and regional complaint mechanisms including:

- Presidency of the Republic of Turkey - Directorate of Communications (CIMER) Portal and free lines “Alo 150”;
- Istanbul Metropolitan Municipality Portal (Beyaz Masa) and free lines Alo 153.

The grievances received from the external government agencies, or other institutional stakeholders e.g., Istanbul Municipality or other similar bodies will also be dealt with using this mechanism. The project team will address all issues raised through national complaint mechanisms and report these cases and actions taken to address them into the Project Grievance Tracker.

In cases where the issues will appear too complex to solve at the Project level or GC level, a decision to involve the legal team of Nakkaş Otoyol A.Ş, will be made by the Senior Management. If there will be cases that are beyond Nakkaş Otoyol A.Ş.' mandate, and in the responsibility of KGM or other government authorities, these will be shared with the relevant authorities and followed up on case-by-case basis.

The grievances received by KGM via CIMER and official letters will be submitted to Nakkaş Otoyol A.Ş. for review and action. Nakkaş Otoyol A.Ş. will review the content of the grievance, contact the owner of the grievance to get further information if needed. Based on the evaluation, Nakkaş Otoyol A.Ş. will take action and inform both the owner of the grievance and KGM accordingly. In case the grievance is beyond Nakkaş Otoyol A.Ş.’s responsibility such as land acquisition, major design change requests by the authorities, etc. KGM will take action and inform the owner of the grievance about the result. The list of these grievances and actions for closure by KGM will be shared with the Nakkas Otoyol A.S on weekly basis to ensure they track all issues and report to the lenders accordingly.

8.4.2 Grievance Redress Mechanism for Internal Stakeholders

There will be a well-documented Internal GRM applicable to the employees, workers including contractors’ workers and their trade unions engaged for the Project. This can be an extension of the Nakkaş Otoyol A.Ş.’s existing GRM at the corporate level or a Project specific GRM developed to cater to grievances of the staff employed at the Project, both on pay-roll and contractually. The provisions of the GRM for internal stakeholders (employees, workers, contractual workers, etc.) will be documented and displayed at relevant locations at the Project office and the staff and workers should be informed about the provisions of Internal GRM at the time of their joining/ on boarding for the Project.

Additionally, Nakkaş Otoyol A.Ş. will require its contractors to establish a grievance mechanism for all their workers, through inclusion of appropriate clauses in their contracts. Nakkaş Otoyol A.Ş. will reserve the right to review records of grievances regularly or conduct consultations with contractual workers on a random basis.

8.4.3 Gender based Violence and Harassment (GBVH) Coverage under GM

8.4.3.1 Senior Management Commitment

Prohibition of Gender based violence and harassment at workplaces will be the top priority of the senior management of Nakkaş Otoyol A.Ş. This will be demonstrated through the inclusion of gender sensitive and human rights focussed guidance in the following policies and procedures that would be instated by Nakkaş Otoyol A.Ş:

- Assigning GBVH focal points and training them to address any potential issues/GBVH incidents;

- Inclusion and Non-discrimination Policies and other Human Resources policies (as applicable);
- Code of Conduct for employees and Workers:
- Grievance Mechanism, and associated monitoring and reporting. Nakkaş Otoyol A.Ş. will establish a grievance mechanism tailored to the needs of different groups (workers and communities) ensuring safe and confidential channels for raising reports of GBVH, including the possibility of raising grievances anonymously and establish a clear protocol for receiving, registering, investigating and tracking reports of GBVH.
- Transparent recruitment and performance assessment systems to reduce opportunities for GBVH;
- Training and awareness raising activities amongst the employees and workers, to motivate attitude and behavioural changes;
- Efforts to work with contractors and suppliers to prevent and respond to GBVH; and
- Design of physical spaces to increase safety and reduce opportunities for GBVH to be perpetrated; and
- Gender Action Plan includes gender-based management actions of Nakkaş Otoyol A.S. and information about GBVH in Turkey and service providers.

8.4.3.2 GBVH Coverage in GM

The process of Grievance Mechanism (presented in Section 7.4) will be an overarching system designed to deal with grievances of all types. To ensure comfort to the victims or survivors of gender-based violence and harassment, linked to the Project, it will be ensured that there are female employees hired by the Project for various roles, as per the skill and experience requirements. The HR/HSE Team including GBVH focal points, will be in charge of interacting with complainants from the staff, workers and the community members. This would ensure that GBVH complaints linked to the Project are reported in a safe and comfortable environment. The confidentiality of the identity of the complainant shall be maintained to the extent possible.

As and when GBVH will be reported, Nakkaş Otoyol A.Ş will respond in a thoughtful and considerate manner, drawing on GBVH, child-protection and legal expertise as needed, and only using trained investigators to conduct investigations.

All GBVH incidents should be reported to EBRD without sharing personal information of the survivor or perpetuators.

8.4.3.3 Training and Capacity Building

Additionally, the employees and workers (both on roll and engaged through contractors) of the Project will be trained on all policies and procedures (including those covering GBVH) during their induction and on-boarding for the Project. This will be followed by signing of the declaration that the employees and workers understand the Code of Conduct and has undergone GBVH related trainings.

Furthermore, the members of the GC will be provided training based on GBVH Good Practice guidance[19] by Gender experts from the industry or NGOs on how to record, investigate, and respond to GBVH related complaints. Key focal points will be selected from the trained members (one each representing each gender) to receive and respond to allegations of sexual harassment in the workplace. These Focal point staff will also require follow-up support from more experienced investigators in complex and/or sensitive situations and Nakkaş Otoyol A.Ş will make all necessary

[19] Addressing Gender-Based Violence and Harassment Emerging Good Practice for the Private Sector Supported by CDC, EBRD and IFC

efforts to make the support/ guidance available. Additionally, external support in evaluating GBVH complaints will need to be sought by the Project in cases where:

- Members from Senior Management of the Project are involved; or
- Community members are involved and there are trust issues linked to Project's evaluation and resolution of complaints.

8.4.4 Coverage of Vulnerable Groups under GM

The Project will undertake measures to make information and aid available to the vulnerable groups, when it comes to communication about and implementation of GM. The GM will be publicised through appropriate channels, community meetings, public announcements, coverage of channels to raise grievances in leaflets and brochures. Additionally, Nakkaş Otoyol A.Ş will ensure that the GM is also publicised in the languages locally understood in the Project Area. There will be a hotline set up by Nakkaş Otoyol A.Ş, as a first step to allow the complainants to lodge anonymous complaints.

In addition, the project will circulate a community information brochure, in local languages (mainly, Turkish, Arabic and English) providing key information about the project, GM, important rights for the affected people to be aware of, CLO contact details and a list with available channels to submit grievances in case they see something wrong (violation of a worker code of conduct-any abusive conduct, unacceptable behaviour etc.), or to explore employment opportunities or any other benefits. The brochure should use easy language, to make it accessible also to people with literacy problems.

The monitoring of the GM process will also place special emphasis on the evaluation of complaints and whether the resolution has been satisfactory and in line with the guidance provided in Section 8.4.1.

8.5 Communication of Grievance Mechanism

The Grievances Mechanism will be comprehensively documented and displayed at relevant locations at the Project office and made available on the Project website. Additionally, the internal stakeholders (employees, workers, contractual workers, etc.) will be explained about the provisions of the GM at the time of their joining/ on boarding for the Project, by their supervisors. This process will be overseen by the CLO of Nakkaş Otoyol A.Ş.

A simple database will be developed to manage and monitor grievances. For every grievance received, the following information will be logged in this database:

- the name and contact details of the complainant;
- the date and nature of the grievance;
- the name of the technical staff charged with addressing the grievance, if appropriate;
- any follow up actions taken;
- the proposed resolution of the grievance;
- how and when relevant Project decisions were communicated to the complainant; and
- whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future, if applicable.

A sample grievance form and database are provided in Appendices A and B to this document. Nakkaş Otoyol A.Ş will assess whether it is suitable to provide the Grievance Form in additional languages due to the immigrants that may be present in the Project area.

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

- **Contact Person: Mutlu Baran Demirpence and Zübeyde Fidan**
- **Telephone:** 0 800 655 10 00
- **Email Address: baran.demirpence@ronesans.com and zubeyde.fidan@mras.com.tr**
- **Face to face**: Stakeholders, including the public, can discuss their grievance with assigned personnel of Nakkas Otoyol at local offices. at KMO Şantiyesi - Şahintepe Mahallesi, Muratdere Caddesi KMO Şantiye No: 134/2 Başakşehir / İstanbul.
- **Public Grievance Mechanism Paper Form:** Stakeholders, including the public can fill in the paper grievance form in Appendix B and either send it to Nakkas Otoyol's offices, or email it to baran.demirpence@ronesans.com
- **Online application:** Stakeholders can fill out the grievance form online at www.nakkasotoyolu.com

9. MONITORING AND REPORTING

9.1 Monitoring and Evaluation

The SEP will be regularly monitored by Nakkaş Otoyol A.Ş Project Management to ensure that the engagement with various stakeholders is getting properly documented with transparent communication channels.

Nakkaş Otoyol A.Ş Social Manager will be responsible for implementation of the SEP along with the Grievance Mechanism during the planning, construction and operations phases of the Project. The Social Manager will coordinate with CLOs and other relevant team members of the Project and contractors and sub-contractors hired for the Project, on maintenance and update of documentation related to stakeholder engagement undertaken by these entities and review of grievance management being undertaken by the contractors.

Each E&S monitoring should include the following metrics:

- Number of Women specific meetings;
- Number of meetings/outreach with vulnerable groups;
- Number of meetings/outreach with public stakeholders;
- % of grievances resolved in the stipulated time frame; and
- % of open grievances after a certain time frame.

Where many stakeholders raise similar issues, these will be grouped as “Common issue” and responses to them will be tracked together in a separate section of the documentation maintained for Stakeholder Engagement and Grievances. An appropriate cross-reference will be made in the response column in the main register. The senior management of Nakkaş Otoyol A.Ş will be informed about consistent complaints of similar nature/ linked to similar entity and a Root Cause analysis may also be triggered based on directives of senior management. The results and any lessons learned will then be incorporated into further updates of the SEP as the Project-related operations evolve. There will be an annual review of the SEP and GM by the Project Management Team.

9.2 Documentation and Reporting

This Stakeholder Engagement Plan is a live document and the Social Manager of the Project is primarily responsible for the update of this SEP during the Planning (prior to construction activities), Construction, and Operations phases, with assistance from the CLOs. The updates to the SEP will comprise the newly identified stakeholder groups (if any) and the stakeholder engagement activities conducted after the previous update.

After disclosure and consultation report that will be prepared at the end of 60 days disclosure process- Regular updates on stakeholder engagement activities, issues raised and addressed will be reported through ES progress update reports/ company website during construction and operation. SEP implementation will also be reported to lenders as art of ES reports

Annual monitoring reports will be made available to affected communities concerning ongoing risks, impacts and mitigation measures, as per the provisions of the Environmental and Social Management and Monitoring Plan (ESMMP) that will be developed as part of the Environmental and Social Impact Assessment.

The documented information to be maintained as part of the requirements of this SEP comprise the following:

- Stakeholder Register;
- Minutes of meetings;
- List of attendees and their contact details (unless requested to be anonymous);

- Feedback received from stakeholders; and
- Grievance Database.

10. INSTITUTIONAL FRAMEWORK

Nakkaş Otoyol A.Ş is responsible for the design, procurement, construction and operation phases of the Project. There will be also a technical consultant company to be appointed by KGM to supervise the construction activities. KGM will manage land acquisition process as per the designated authority within Turkish laws in liaison with Nakkaş Otoyol A.Ş.

Nakkaş Otoyol A.Ş will establish an appropriate organizational structure that involves appointment of an Health, Safety, Social and Environment (HSSE) Director for managing of EHS, Occupational Health and Safety, and social aspects to supervise and manage the E&S risks and impacts linked to the Project. Community Liaison Officers (CLOs) will also be appointed to manage day to day community engagement activities facilitating information disclosure, stakeholder engagement, grievance management, etc.

10.1 Roles and Responsibilities

The specific responsibilities of Nakkaş Otoyol A.Ş. and EPC Contractor associated with SEP implementation for the Project are shown in the table below.

Table 10-1 SEP Roles and Responsibilities

Role	Responsibility/Accountability
Nakkaş Otoyol A.Ş. Senior Management	▪ Has overall accountability for the Project including delivery in line with applicable national and Lenders standards. ▪ Ensure allocation of sufficient resources for the SEP implementation including organisation, permitting, training, equipment and qualified personnel. ▪ Ultimate responsibility for ensuring implementation of grievance mechanism. ▪ Periodical review of the SEP implementation effectiveness in line with the provisions of the Project requirements.
Nakkaş Otoyol A.Ş. Social Manager	▪ Manage SEP and grievance mechanism. ▪ Manage community liaison resources including consultants for implementation of the Project social requirements. ▪ Managing labour and working conditions, gender equality, human rights, community safety and security, local procurement and recruitment in line with Lenders standards. ▪ Oversight of the EPC Contractors' activities to ensure they align with Project and Lender requirements. ▪ Manage the engagement with NGOs and other stakeholders on a regular basis. ▪ Provide the Project leadership team with advice, guidance and assurance on social topics. ▪ Liaise with KGM field staff with regard to land acquisition and compensation. ▪ Report social performance to management, lenders, and other related parties. ▪ Coordination of CLOs for GM implementation to follow-up resolutions of complaints, requests and grievances received for third parties. ▪ Establish a grievance redress mechanism program throughout the Corridor that ensures that all grievances (verbal and written), are registered and transmitted to responsible authorities, addressed in a timely manner and reported back to the aggrieved parties. In addition, monitor and submit reports on the performance of the mechanism in accordance with SEP. ▪ Prepare quarterly progress and compliance reports for management, Lenders, as well as other external parties. ▪ Provide input to auditors regularly to ensure a fair and transparent internal audit as well provide assistance to the external auditors on quarterly basis.

Role	Responsibility/Accountability
	▪ Control the application of grievances procedures so that records of are kept and followed-up and appropriate corrective actions are taken with satisfactory outcomes.
EPC Project Manager	▪ Work in coordination and cooperation with EPC Senior Social Expert. ▪ Has responsibility for the implementation of the Project activities stated in this SEP. They will be suitably competent and have a strong understanding of construction best practice aligned with national law and applicable Lender requirements. ▪ Accountable for overall SEP and GM performance and making the human and financial resources available to ensure compliance with Project requirements. ▪ Responsible for Employment and Training Management associated with the construction works. ▪ Report ESHS performance to Deputy General Manager.
EPC Senior Social Expert	▪ Act as the custodian of the SEP and GM specific for the Project and responsible for documentation and updates. ▪ Liaise with the relevant NGOs and other stakeholders on a regular basis in line with SEP. ▪ Plan the stakeholder engagement activities and ensure they are appropriately implemented by the CLOs deployed along the different sites ▪ Manage and supervise the CLOs including consultants for implementation of the SEP and Project social requirements. ▪ Managing labour and working conditions, gender equality, human rights, community safety and security, local procurement and recruitment in line with Lenders standards. ▪ Report social performance to Nakkaş Otoyol A.Ş Social Manager and other related parties. ▪ Manage Grievance Mechanism. ▪ Responsible for ongoing stakeholder engagement at all levels and monitoring of the overall stakeholder activities. ▪ Supervise/monitor and coordinate activities with subcontractors to ensure they comply with the SEP. ▪ Especially ensure outreach to vulnerable members of the affected communities through CLOs. ▪ Ensure Community Liaison Officers reports on time and with the expected and agreed points. ▪ Receive feedback on social performance and resettlement issues from CLOs. ▪ Ensuring that Project's employees are informed and trained on the SEP. ▪ Ensuring H&S team reports on time and with the expected and agreed points. ▪ Providing resources to ensure that interests of stakeholders are represented and taken into consideration. ▪ Managing and coordinating grievances or concerns regarding H&S or environmental issues. ▪ Maintain an oversight and monitoring role with regard to resettlement planning and implementation. ▪ Manage and supervise the CLOs including consultants for implementation of the Project social requirements. ▪ Report social performance to SPV Social Manager and other related parties. ▪ Provide the EPC Contractor's Project management team with advice, guidance and assurance on social topics.

Role	Responsibility/Accountability
Grievances Committee	The GC is driven internally by Nakkaş Otoyol A.Ş. and EPC Project team and led by the Nakkaş Otoyol A.Ş. Senior Management and has representation from the following teams: ▪ Nakkaş Otoyol A.Ş. Senior Management; ▪ Nakkaş Otoyol A.Ş. Social Manager; ▪ Construction Manager/Project Manager; ▪ EPC Senior Social Expert; ▪ Resettlement Expert, and ▪ Community Liaison Officer (CLOs). The committee shall have at least (but preferably more) one female member. There may be nominated members from the local Governance bodies (e.g. Muhtars, soil experts/agricultural experts from the local governorate of agriculture) or senior representative from the EPC Contractor/ Sub contractor added to the Committee in specific cases, where any other concerned person with decision making authority in relevance to the grievance or aggrieved party needs to be involved. Main responsibilities of the GC include: ▪ Oversight of GM implementation; ▪ Solution of grievances; ▪ Periodic review of grievances raised by internal and external stakeholders; and ▪ Review of responses being shared with external stakeholders in an attempt to resolve non-judicial disputes arising out of various matters related to the Project.
Community Liaison Officers (CLOs)	▪ Establish and maintain the database of all PAPs (households with particular attention to the ones with vulnerabilities and formal and informal users of the affected parcels) with support from the Expropriation Chief. ▪ Engage with the PAPs for the implementation of RAP measures and actions ▪ Be responsible from daily implementation of related RAP actions (e.g. grievances, stakeholder information and consultations, etc.) on site under the coordination of the RAP Implementation Team Head and in cooperation with the Expropriation Chief, including engagement with the stakeholders and management of land acquisition related grievances. ▪ If received by the Contractor, enter the grievances and feedback relevant to land acquisition in a dedicated database (separate from other Project grievances not relevant to land acquisition) (relevance to be decided by the RAP Implementation Team Head and/or the Expropriation Chief). ▪ Lead day-to-day implementation of the SEP and grievance mechanism, including proactively maintaining regular contact with affected communities through regular community visits, calls or other online engagement to monitor opinions and provide updates on Project activities, and ensuring communication with vulnerable groups in line with the Project SEP ▪ Support Social Expert during planning and implementation of her/his tasks. ▪ Contact persons for statutory stakeholders and Non-Governmental Organisations (NGOs). ▪ Initiate institutional agreements with statutory stakeholders (e.g. trainings to be received by Project affected people). ▪ Set-up and perform meetings on the non-community level. ▪ Be accessible to liaise with affected population per request, especially for vulnerable groups. ▪ Assist affected people in issues related to the Project (answer questions about the process, delivery of grievances, information about consultation activities etc.).

Role	Responsibility/Accountability
	▪ Facilitate access of Project-Affected-Persons (PAPs) to third party legal support, if necessary. ▪ Advise on avenues for the resolution of conflicts amongst land owners in cases of multiple ownerships. ▪ Assist within grievance management. ▪ Facilitate the smooth liaison between stakeholders by maintaining regular contact and networking to ensure that project affected people are well informed of their rights and responsibilities set out in national legislation and respective Stakeholder Engagement Plan and Resettlement Action Plan in particular and other relevant execution plans; ▪ Set up and organize meetings with any other agencies or person if so requested, including organizing meeting spaces; ▪ Set up and organize particular meetings and focused studies together with women to encourage women's' active support to the Project during construction and operation, as well collect views and expectations of women through these meetings ▪ Maintain detailed and accurate record of meetings including agendas, meeting minutes, follow-up/action points in association with other experts. Details of meeting held or cancelled should also be maintained; ▪ Prepare or get them prepared, deliver documents; reports, brochures, informative letters, notifications, to all the interested parties and similarly receive documents from both external and internal parties; ▪ Ensure that follow up of document approvals by concerned authorities is done timely and consistently and keep the Project Manager updated as required; ▪ Ensure that communities at construction sites are kept abreast of the project developments and communication channels remain open with the communities; ▪ Ensure that communities at construction sites are kept abreast of the project developments and communication channels remain open with the communities ▪ Provide governance; ▪ Respond to community concerns by ensuring that they are brought to the attention of the Project and facilitate the process of resolving the issue; ▪ Acting as focal point for the Project stakeholders in terms of grievances, complaints and requests; ▪ Responsible for ensuring all GM records are captured, issued to relevant departments for resolution and proper close-out as per Project SEP; ▪ Assist in the identification of potential implementation problems and bottlenecks, ▪ Providing engagement support for individuals with disabilities in accordance with Project definitions, in particular to the RAP ▪ Report to Senior Social Manager on a daily and weekly basis on community issues and the project's performance in relation to those issues; ▪ Keep up with the weekly and daily developments of the project; ▪ Mediate issues between the community members and the project staff; ▪ Forward questions about the project from community leaders and residents to appropriate government authorities and the Project Manager; ▪ Create social media strategy ▪ Develop and maintain value add marketing tools, including marketing literature, newsletters, Facebook page, and other external communications ▪ Ensure web designs are in place using modelling tools to publish the documents, information and other presented material during any communal gathering and keep it up-to-date ▪ Facilitate well prepare and organize trainings consistent with the Project requirements and policies

Role	Responsibility/Accountability
	▪ Report to SPV – Senior Social Manager and EPC – Senior Social Expert on a daily and weekly basis on community issues and the project's performance in relation to those issues ▪ Perform other duties as may be assigned.

Table 10-2 Roles and Responsibilities of the Project Team during SEP Implementation

Company	Role	Responsibility
Nakkaş A.Ş. and REC	Project Manager and Construction Manager (CM)	▪ Leads the EPDC process. ▪ Will be present in all public events. ▪ Will introduce the Project in meetings.
	Environment Health Safety and Social (EHSS) Managers	▪ Will be present in all public events. ▪ Will explain the E&S scope of the Project. ▪ Will be responsible for ensuring unhindered participation of vulnerable groups.
	Community Liaison Officers (CLOs)	▪ Will be present in all public events. ▪ Will explain Grievance Mechanism and address the specific complaints of the local stakeholders with whom s/he is involved on a daily basis.
	Expropriation Chief	▪ Will participate in public events. ▪ Will explain the land acquisition aspects of the Project. ▪ Will support Nakkaş EPDC management.
	Biologist	▪ Will participate in open-day exhibitions.
	Archeologist	▪ Will participate in open day exhibitions and the neighborhood meeting at Şamlar, the site of archeological findings.
	REC Pusula Interns	▪ Engineering trainees that are selected as part of Nakkaş Otoyol A.Ş. HR's career path initiative, will be recruited throughout the 60-day period as front-line personnel. ▪ Will staff the five Public Disclosure Offices ▪ Act as hosts to the visitors during public events
	E&S Assistant Specialists	▪ Will supplement the REC Pusula interns at the Public Disclosure Offices
KGM	Expropriation chiefs and specialists	▪ Will be present in all public events. ▪ Will address land acquisition, resettlement and compensation issues.
HAPA Engineering (Internal) SRM Consultancy (External)	Internal and External RAP Monitoring Teams	▪ These teams will continue to monitor effective implementation of RAP and grievances
ERM	Authors of draft ESIA	▪ Will be present in all public events during ESIA disclosure. ▪ Will deliver opening statements and explain ground rules and the impacts of the Project and related mitigation measures.
ACE Consulting	Partner	▪ A female partner of ACE will attend the meetings with women.
Core Project	Consultants Event managers Technicians Field supervisors Service personnel	▪ Will build and operate the physical environment. - Organize the events. - Arrange the logistics. - Create the content and design visual material and lend support to website updates. - Supervise the flow of the program.

Company	Role	Responsibility
		- Will design and maintain the institutionally-desired atmosphere in which EPDC will take place. ▪ Will be responsible for collecting, then collating and tabulating the comments for the duration of EPDC. ▪ Will sort comments according to issues and help draft general and specific responses and ensure their delivery to the stakeholders. ▪ Will produce the Final ESIA Disclosure and Public Consultation Report. ▪ Core Project will report to Nakkaş A.Ş.

10.2 Budgetary Allocation

Nakkaş Otoyol A.Ş will ensure that proper budgetary allocations and resources are available for the activities related to stakeholder engagement, like meetings, trainings, addresses of needs identified and found reasonable through the stakeholder engagement process.

APPENDIX A PRELIMINARY STAKEHOLDER LIST

List of Key stakeholders

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
Authorities	Ministry of Transport and Infrastructure	▪ Regulatory functions for infrastructural investments ▪ Coordinates, regulates, and supervises land, sea, air, and railway transportation and communications, as well as the construction and maintenance of relevant infrastructure ▪ Land Acquisition and compensations of the transport and infrastructure investments
	Ministry of Environment, Urbanization and Climate Change	▪ Issuing the environmental permits for emissions and discharges ▪ Environmental impact assessment decisions for projects
	Ministry of Labour and Social Services	▪ Labour and working conditions, and occupational health and safety
	Ministry of Agriculture and Forestry	▪ To determine policies on protection, improvement, operation, rehabilitation and maintenance of forest areas; combating desertification and erosion; reforestation and pasture improvement on forestry ▪ To determine policies regarding nature conservation and designation of protected areas; to protect, manage, improve, operate (or having them operated) national parks, nature parks, nature monuments, nature reserve area, wetlands, biological diversity and to protect wildlife
	Ministry of Culture and Tourism	▪ Registering the cultural and natural heritages that are identified by the Ministry or ordered to be identified by the General Directorate ▪ Classifying the cultural and natural heritages that should be protected ▪ Reviewing and deciding land use plans and amendments to them ▪ Giving decisions on implementation projects ▪ Determining the protection areas for cultural and natural heritage sites.
	Mayor of Istanbul Metropolitan Municipality and relevant departments such as : ▪ Directorate of City Planning ▪ Water and Sewage Directorate (ISKI) Fire Department	▪ Permits (e.g. issuing of permits and licenses of construction works and traffic planning), licences, fire control, emergency response
	Istanbul Governorship	▪ Highest provincial authority responsible for the state affairs in the province of Istanbul.
	General Directorate of Highways	▪ Land acquisition of the Project RoW alignment

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
		▪ Approval of the design documents prepared by Nakkaş Otoyol Yatırım ve İşletme A.Ş ▪ Monitoring and oversight of design, construction and operation phases of the Project
	Istanbul Provincial Directorate of Environment and Urbanization (PDEU)	▪ PDEU has regulatory functions relating to the Project such as environmental impact assessment permits, environmental permitting and auditing. ▪ PDEU may have views on future construction activities.
	Istanbul Provincial Disaster and Emergency Directorate	▪ Regulatory functions and permits, liaison in respective areas
	Istanbul Provincial Health Department	▪ Regulatory functions and permits, liaison in respective areas
	Istanbul Provincial Directorate of Culture and Tourism	▪ Registering the cultural and natural heritages ▪ Classifying the cultural and natural heritages that should be protected ▪ Reviewing and deciding land use plans and amendments to them ▪ Giving decisions on implementation projects ▪ Determining the protection areas for cultural and natural heritage sites.
	Istanbul Provincial Directorate of Ministry of Family and Social Services	▪ Establishes executing policies for disadvantaged groups ▪ Performs, implements and executes social services for disadvantaged groups ▪ Potential service provider for GBVH-specific services
	Başakşehir District Agriculture Directorate	▪ Liaison on land use and agricultural activities in the Project vicinity
	Arnavutköy District Agriculture Directorate	▪ Liaison on land use and agricultural activities in the Project vicinity
	District Governorships: ▪ Başakşehir ▪ Arnavutköy ▪ Büyükçekmece ▪ Çatalca ▪ Avcılar	▪ Highest district authority ▪ Liaison on poor and vulnerable people ▪ Emergency response liaison

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	District Municipalities: ▪ Başakşehir ▪ Arnavutköy ▪ Büyükçekmece ▪ Çatalca ▪ Avcılar	▪ Specific views on project, community and business reach out/liaison ▪ Information disclosure, Infrastructure and utility issues liaison
	İŞKUR – Başakşehir	▪ Aiding activities of protecting, improving, generalizing of employment and preventing unemployment in Başakşehir vicinity ▪ Liaison on employment
	İŞKUR – Arnavutköy	▪ Aiding activities of protecting, improving, generalizing of employment and preventing unemployment Arnavutköy vicinity ▪ Liaison on employment
	Neighbourhood Headman (Muhtars): ▪ Başakşehir 1 Mahallesi ▪ Başakşehir 2 Mahallesi ▪ Şamlar Mahallesi ▪ Şahintepesi Mahallesi ▪ Kayabaşı Mahallesi ▪ Hadımköy Mahellesi ▪ Deliklikaya Mahallesi ▪ Ömerli Mahallesi ▪ Sazlıbosna Mahallesi ▪ Yeşilbayır Mahallesi ▪ Karaağaç Mahallesi ▪ Bahşayiş Mahallesi ▪ Nakkaş Mahallesi ▪ Firuzköy, Mahallesi ▪ Tahtakale Mahallesi	▪ Specific views on project, community reach out/liaison and reach out to communities especially with vulnerable groups ▪ Land acquisition information disclosure and complaint/grievance management

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	▪ Social solidarity foundations of district governorships ▪ Social aid departments of district municipalities	▪ Liaison about households below poverty line, women headed households, elderly, disabled and Syrian refugee numbers at the neighborhood levels
Local Communities	▪ Land Owners ▪ Land Users ▪ Informal Land Users	▪ Dust, noise and vibration ▪ Land acquisition and economic resettlement ▪ Traffic and community H&S ▪ Access, affordability, mobility, utilities and infrastructure impacts ▪ Employment, and labour influx impacts ▪ Information disclosure, engagement and grievance management ▪ Visual impacts
	Vulnerable Groups (Local residents with informal housing, Women headed households, Children headed households, Elderly, Registered and non-registered migrants and refugees)	▪ Risks of impacts to livelihoods without compensation ▪ Risks of difficulties to access to information and engagement, especially on land acquisition and complaint mechanisms (amongst others due to language barriers or illiteracy) ▪ Lack of assistance and legal aid ▪ Risks of impact on sustenance informal farming and animal husbandry ▪ Impacts on public amenities ▪ Increased community H&S risks ▪ Risk of being exposed to human rights violations, including child and forced labour or informal work arrangements ▪ Risk of increased GBVH exposure
	Sensitive receptors and their users (Hospitals, schools, parks, mosques and other public amenities)	More sensitive to: ▪ Dust, noise, vibration ▪ Traffic ▪ H&S risks
Local Businesses	Commercial enterprises including affected factories, local businesses such as: Waste collection (non-hazardous recyclables incl. metal, paper, plastic) Manufacturing (hydraulic breakers	▪ Land acquisition and economic resettlement ▪ Dust, noise, vibration ▪ Traffic and access issues (i.e. road closures, traffic density increase, blockage of business exits and entries) ▪ Local procurement ▪ Visual Impacts

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	and industrial goods) Building construction	▪ Employees
	Larger industrial enterprises	▪ Dust, noise, vibration ▪ Traffic and access issues ▪ Land acquisition and physical resettlement ▪ Local procurement ▪ Visual Impacts
	Agricultural and animal husbandry enterprises	▪ Dust, noise, vibration ▪ Traffic and access issues (blockage of animal commuting routes or grazing areas) ▪ Land acquisition and economic resettlement ▪ Local procurement
Tenants	▪ Manufacturing (tulle curtain) ▪ Manufacturing (creative box and packaging) ▪ Metal casting (pots, pans) Branch of Leasing Company Manufacturing and warehouse (auxiliary chemicals for textile industry) ▪ Import and marketing (home accessories and glassware) ▪ Manufacturing (wet wipes caps, covers, cotton swabs, boxes, etc.) ▪ Waste recycling (plastic) ▪ Local butcher and meat restaurant ▪ Excavation works and landscaping	▪ Dust, noise, vibration ▪ Traffic and access issues ▪ Land acquisition and economic resettlement ▪ Local procurement

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	Import, export, sales and marketing (floriculture and landscaping)	
Workers	Project owner, contractor and sub-contractor employees and workers, workers unions (including project workers as well as other construction sector unions and confederations: **Unions:** ▪ YOL-İŞ ▪ DEV YAPI- İŞ ▪ İNŞAAT - İŞ ▪ ÖZ İNŞAAT – İŞ ▪ YENI YOL- İŞ ▪ İYI- SEN ▪ İNŞAAT-SEN ▪ MES-ED-SEN ▪ DAYANIŞMA **Confederations:** ▪ TÜRK-İŞ ▪ DİSK ▪ HAK-İŞ ▪ AKSIYON-İŞ	▪ Labour and working condition issues: including H&S, work space and accommodation issues ▪ Employment, rights and association/labour union issues, temporary employment and retrenchment issues by end of work ▪ Child labour/ forced labour/ informal labour ▪ Grievance management/harassment control, ▪ Non-discrimination/ Gender equality and gender-based violence and harassment risks.
Professional Organisations	Trade, industry and craftsmen chambers, business associations as well as cooperatives and unions and industrial zone management ▪ Istanbul Chambers of Commerce	▪ Information disclosure and engagement ▪ Local procurement and service provision

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	▪ The Union of Chambers of Turkish Engineers and Architects ▪ Istanbul Chamber of Urban Planners ▪ Istanbul Chamber of Agricultural Engineers ▪ Istanbul Chamber of Civil Engineers ▪ Istanbul Trade and Industry Chamber ▪ İkiltelli Industrial Organized Zone ▪ İSTOÇ ▪ Başakşehir Industrial Zone	
NGOs	▪ Nezahat Gökyiğit Botanical Garden ▪ FEV (Physically Disabled Foundation) ▪ ISEM (Istanbul Municipality Physically Disabled Foundation) ▪ Association for Solidarity with Asylum Seekers and Refugees ▪ Women Entrepreneurs Association of Turkey (KAGIDER) ▪ ÇEVKO ▪ ÇEKÜL ▪ Nature Association (Doğa Derneği) ▪ WWF (Dünya Vahşi Yaşam Fonu)	They may have specific views on: ▪ Tree cutting and forest loss, ▪ Affordability and accessibility, ▪ Land acquisition, ▪ Vulnerable groups outreach, ▪ Refugee issues, ▪ Gender issues, ▪ GBVH issues

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	▪ Türkiye Global Environmental Organization (GEO) ▪ TEMA Foundation ▪ Northern Forests Defense (KOS) ▪ DAYKO ▪ İstanbul Urban Transformation Organization ▪ İstanbul Municipality ULAŞIM A.Ş. ▪ İstanbul Public Transportation (ISTOD) ▪ Rail Transportation Systems and Industrial Organization (RAYDER) ▪ Smart Transportation Organization (AUSDER) ▪ Women shelter of the metropolitan and district municipalities ▪ Police Stations and Gendarme Stations ▪ Public Prosecutor's Offices ▪ Family Court Judge ▪ Social Service Counselling Line for Families, Women, Children and Disabled Persons ▪ Provincial Directorates of Family and Social Policies ▪ Ministry of Interior: ▪ Violence Prevention and Monitoring Center (SONIM)	

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	▪ Mor Çatı Women's Shelter Foundation ▪ Health centres ▪ Bar Associations ▪ Women Solidarity Centres of Municipalities	
RAP Implementing Partners	▪ Ministry of Environment, Urbanization and Climate Change ▪ Ministry of Agriculture and Forestry ▪ Ministry of Family, Labour and Social Services ▪ Ministry of Education ▪ Turkish Employment Agency - Istanbul Provincial Directorate ▪ Istanbul Provincial Directorate of Agriculture and Forestry (including district directorates of Agriculture and Forestry) ▪ District Governorates of Arnavutkoy, Avcilar, Basaksehir, Catalca ▪ Istanbul Metropoliatan Municipality ▪ District Municipalities of Arnavutkoy, Avcilar, Basaksehir, Catalca ▪ Head of affected neighbourhoods ▪ Istanbul Chamber of Agriculture and district branches	

Stakeholder Group (as per priority order)	Key Stakeholders	Summary of Roles/Key Impacts/Specific Views
	▪ Business management, agriculture, agricultural economics, etc. departments of relevant universities ▪ Business management consultants ▪ Agricultural consultants ▪ Valuation companies and experts	

APPENDIX B GRIEVANCE FORM / GRIEVANCE CLOSE OUT FORM

GRIEVANCE FORM

Reference No. *(To be assigned by Project office personnel):*

Preferred language for communication	☐ **Turkish** ☐ **English** ☐ **Other, please specify:** _____

Please enter your contact information and grievance. This information will be dealt with confidentially.

Please note: If you wish to remain anonymous, please enter your comment/grievance in the box below without indicating any contact information – your comments will still be considered by

Full Name	
Anonymous submission	☐ **I wish to raise my grievance anonymously** ☐ **I request not to disclose my identity without my consent**
Please mark how you wish to be contacted (mail, telephone, e-mail).	☐ **By telephone (please provide telephone number):** _____ ☐ **By e-mail (please provide e-mail address):** _____

Description and type of the incident or grievance: ☐ **Construction nuisance due to noise, dust, vibration, blasting, etc.** ☐ **Land acquisition, compensation, livelihood, damage to property** ☐ **Employment, procurement, supply chain** ☐ **Gender based violence and harassment** ☐ **Human rights** ☐ **Workplace (discrimination, forced labour, child labour, overworking hours, payments, occupational health and safety etc.)** ☐ **Community Health, Safety and Security** ☐ **Others (Please specify)**	What happened? Where did it happen? Who did it happen to? What is the result of the problem?

Date of incident/grievance: _____	☐ **One time incident/grievance (date _____)** ☐ **Happened more than once (how many times? _____)** ☐ **On-going (currently experiencing problem)**

What would you like to see happen to resolve the problem?

GRIEVANCE CLOSE OUT FORM

Reference No. *(To be assigned by Project office personnel):*

Preferred language for communication	☐ **Turkish** ☐ **English** ☐ **Other, please specify:** _____

Grievance at stake:	Short summary of the situation/incident/grievance
	☐ One time incident/grievance (date _____) ☐ Happened more than once (how many times? _____) ☐ On-going (currently experiencing problem)
Officer in charge:	
Measures taken to close the grievance:	Short description of measures taken to close out the grievance.

Date of incident/grievance resolution:

_____

Please note: Closing grievances with this form is not sufficient on its own. Please attach to this form any kind of documented evidence, indicating processes that were undertaken and any documents to prove the grievance was resolved. Such evidence can include receipts, bank statements, photographs, official letters, decisions of certain commissions that carry out appraisal etc. Please list the attached evidence below.

Attachments:

What additional steps have been taken for the avoiding the future occurrence of this problem?

Please note: The right to access information is crucial to the proper functioning of this grievances mechanism. Hence, if not submitted anonymously, affected parties should be informed about measures taken to solve their grievances and further steps taken to prevent reoccurrence of future incidents. Therefore, this form, including attachments, should be made available to affected parties, as proof that their grievances have been properly handled and been resolved.

APPENDIX C GRIEVANCE DATABASE

NAKKAS OTOYOL A.S Sample Grievance Register											
Number	**Date of the Receipt**	**Type of Receipt**	**Name of the Complainant**	**Relevant to Internal Grievance Committee**	**Description of the Grievance**	**Grievance Issued to Relevant Department**	**Due Date for the Response**	**Actual Response Date**	**Details of Corrective and Preventive Action**	**Response Date to the Complainant**	**Status (Closed/Open)**

APPENDIX D PROJECT INFORMATION LEAFLET

PROJECT INFORMATION LEAFLET

Northern Marmara Motorway

Nakkaş-Başakşehir Highway Section

THE PROJECT

The Nakkaş-Başakşehir segment (the Project) is the last portion of the "O7 - Northern Marmara Motorway" (see figure) which is comprised of eight different sections. The motorway was designed to connect Asia and Europe and to ease the overall transportation load in the Marmara Region which hosts the largest industrial zones and activities in Turkey.

The Project was initiated by the Turkish Ministry of Transport and Infrastructure, General Directorate for Highways (KGM), who tendered the Project under a Build, Operate and Transfer (BOT) Contract model. The BOT Contract was awarded to Nakkaş Otoyol Yatırım ve İşletme A.Ş. (Nakkaş Otoyol A.Ş) - a Special Purpose Vehicle (SPV) under a Build, Operate and Transfer (BOT) contract signed with Turkish Ministry of Transport, General Directorate for Highways (KGM) in 2020 - is responsible for the construction and operation of the Project.



Project Location

PRELIMINARY PROJECT INFORMATION

The Project is a new 4-lane dual toll road with a total length of 30,64 km including connection road and 1,619 m long Sazlıdere Cable Stayed Bridge. The construction of Nakkaş - Başaksehir Motorway (Section 8) has started in August 2021 and is planned to be completed by August 2025.

- Viaducts will be used in 5 locations where the road crosses larger elevation differences in rough terrain such as in steep valleys
- There will be 10 interchanges and their carriageways will be generally 2-lanes
- 18 Underpasses and 18 overpasses will be constructed to ensure the free passage



Profile of the Cable Stayed Bridge



Illustration of interchanges and carriageways

Environmental and Social Impact Assessment (ESIA)

An Environmental and Social Impact Assessment (ESIA) was undertaken by a team of independent consultants from Turkey and Europe. This is a process which investigated the environmental and social issues for such new projects and looks at ways in which adverse effects, if any, can be avoided and where possible mitigated, and positive benefits further enhanced.

As part of Nakkaş Otoyol A.Ş commitment to high standards of environmental and social performance, additional studies for the Project were undertaken and guided by the requirements of:

- Turkish national legislation; and
- Policies and guidelines of the international financing institutions.

The Project route was already selected by KGM so as to minimize possible social and environmental impacts. In the meantime, the Project went through the detailed design stage while the ESIA is undertaken in parallel. In this way, ESIA results and input from the public helped to optimise the final design.

Some examples of potential environmental and socio-economic impacts of the Project construction and operation include:

- biodiversity;
- air emissions and noise levels;
- land acquisition and livelihood restoration
- cultural heritage; and
- community, worker, road & traffic safety.





Flora and fauna species found in the area

The data collection process in the field started in May 2021 and continued through summer and autumn, in parallel with meetings held with members of the local communities. The draft ESIA Report was prepared and there will be additional meetings to disclose its conclusions. Prior to finalising the ESIA Report, there will be a period of 60 days of public disclosure during which anyone will have the chance to review the report and submit comments.

The expropriation process has started and will be in line with the national requirements regarding Resettlement Policy Framework as well as the applicable EBRD's performance requirements. Land Acquisition and Compensation Guidance will be prepared and shared with the Project Affected Peoples prior to the commencement of expropriation process.

NAKKAŞ OTOYOL A.Ş ENVIRONMENTAL AND SOCIAL VALUES

Nakkaş Otoyol A.Ş is committed to best environmental and social performance throughout the lifetime of the Project. Nakkaş Otoyol A.Ş established its Environmental and Social Sustainability Policy which is covering following topics and disclose to public through Project information channels:

- Labour and working conditions;
- Health and Safety;
- Biodiversity and nature conservation;
- Energy Efficiency and Resource Conservation;
- Cultural Heritage; and
- Stakeholder Engagement and Grievance Mechanism.

STAKEHOLDER ENGAGEMENT AND PUBLIC CONSULTATION

The Project follows the regulatory public consultation and disclosure process in accordance with international standards. Additional and supplementary stakeholder engagement opportunities will be provided by Nakkaş Otoyol A.Ş in line with international best practice.

The stakeholder engagement process will, however, continue throughout the lifetime of the Project.

HOW CAN YOU BE INVOLVED?

Nakkaş Otoyol A.Ş invites you to participate in the ESIA process and express your opinion at early stage of the Project. Your comments are a key part of the assessment process, and it is important that Nakkaş Otoyol A.Ş understands your concerns. There is a mechanism in place to receive and address grievances from stakeholders.

ALL QUESTIONS AND OPINIONS CAN BE DIRECTED TO:

NAKKAŞ OTOYOL YATIRIM

Name: **Baran Demirpence**

Phone/ fax: **0 800 655 10 00**

Email: baran.demirpence@ronesans.com

Website: www.nakkasotoyolu.com

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