ANTALYA ALANYA MOTORWAY

ANTALYA – ALANYA MOTORWAY PROJECT

RESETTLEMENT ACTION PLAN (RAP)

GUIDE TO LAND ACQUISITION AND COMPENSATION (GLAC)

– AFFECTED LANDS AND HOUSES –

JULY 2026

REVISION 2

CONTENT

A.	INTRODUCTION
B.	PROJECT DESCRIPTION
C.	LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS
D.	EXPROPRIATION PROCESS IN LINE WITH THE EXPROPRIATION LAW
E.	COMPENSATION AND ENTITLEMENTS UNDER RESETTLEMENT ACTION PLAN (RAP) TO MEET INTERNATIONAL STANDARDS
F.	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE
G.	PROJECT GRIEVANCE MECHANISM
H.	CONTACT INFORMATION FOR STAKEHOLDERS

APPENDIX: GENERAL DIRECTORATE OF HIGHWAYS' (KGM) BOOKLET REGARDING PROCEDURAL STEPS IN EXPROPRIATION ACTIVITIES

A. INTRODUCTION

1. What is Antalya-Alanya Motorway Project?

The **Antalya-Alanya Motorway** Project (the "**Project**") is a Public-Private Partnership (PPP), with the **Public Partner** – being the Republic of Türkiye Ministry of Transportation and Infrastructure (MoTI), represented by the **Directorate General of Highways (KGM)**, and the **Private Partner** – being the **Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.** (the Assigned Company).

Implemented under a **Build-Operate-Transfer (BOT)** model, the Project is one of two sub-projects that constitute the broader Afyonkarahisar-Alanya Motorway Project, which was initially tendered in 2010.

The Project is located in **Antalya province,** southern Türkiye and traverses the boundaries of **three districts** – **Serik, Manavgat and Alanya** – which are key touristic and commercial hubs of the country.

2. Who is the Granting Authority under the BOT Contract?

Within the context of the BOT Implementation Contract, the **Granting Authority** is the **Republic of Türkiye Ministry of Transportation and Infrastructure** (MoTI), represented by the **Directorate General of Highways (KGM)**. KGM is responsible for implementing the land acquisition and expropriation works required for the Project in accordance with the Expropriation Law of Türkiye.

3. Who is the Assigned Company under the BOT Contract?

The Company assigned under the BOT Implementation Contract is **Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş**. – a Special Purpose Vehicle (SPV) established by **Limak İnşaat Sanayi ve Ticaret A.Ş., an affiliate of Limak Holding**.

The Assigned Company is responsible for the **design, construction, financing, operation, and maintenance** of the Motorway until its transfer to KGM at the end of the BOT concession period.

4. What are the Project's Applicable International Standards

The Project is financed by international financial institutions (IFIs) and commercial banks. A Finance Agreement was signed between the Assigned Company and the Lenders on 6 October 2025.

The following international standards are applicable to the Project:

- **International Finance Corporation (IFC)** Performance Standards (PSs) (2012),
- **Equator Principles (EP) 4** (2020), and
- **Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework** (2019).

5. Why has a Resettlement Action Plan (RAP) been prepared, and how will it be implemented?

The land acquisition required for the Project results in risks and impacts related to both physical and economic displacement. Accordingly, a **Resettlement Action Plan (RAP)** has been prepared in line with applicable international standards, with the objective of developing and implementing measures to mitigate these risks and impacts on individuals owning and/or or using the affected lands and houses, as well as on the employers and employees of impacted businesses.

The entitlements, measures, and livelihood restoration and improvement programs under RAP are in addition to the compensation provided by KGM in accordance with the Expropriation Law. The additional costs associated with RAP implementation will be covered by the SPV **through the RAP Fund, which is allocated and managed by the SPV –** separate from KGM's Expropriation Budget.

The **RAP is a living document** and will be updated as necessary.

It is disclosed in Turkish and English under the Project's ESIA Package at the Project website (www.antalyaalanyaotoyolu.com.tr).

The RAP will be implemented by the SPV in collaboration with KGM. The RAP implementation period will cover a duration of **36 months**, commencing from the singing of finance agreement, though **implementation of the key principles by the SPV has already commenced.**

6. What other Environmental and Social (E&S) studies have been undertaken for the Project?

The Project secured an **EIA Positive Decision** on 17 August 2018, in accordance with the Environmental Impact Assessment (EIA) Regulation in force at the time.

Additionally, an **Environmental and Social Impact Assessment (ESIA) package,** including a Non-technical Summary (NTS), Stakeholder Engagement Plan (SEP) and E&S Management Plans, compliant with the applicable international standards, has been prepared for the Project and disclosed in Turkish and English at the Project website (www.antalyaalanyaotoyolu.com.tr).

7. How the RAP has been reviewed independently?

Potential Lenders of the Project retained an independent **Environmental and Social Consultant (IESC)** in October 2024 to carry out an **Environmental and Social Due Diligence (ESDD)** review.

The purpose of the ESDD was to conduct an independent review of the Project's ESIA package – including the RAP – and to evaluate the compliance of land acquisition activities with the standards and requirements of the Lenders. Based on this review, the IESC also developed an **Environmental and Social Action Plan (ESAP).**

The RAP implementation will be periodically monitored by the **Lenders' IESC.** .

8. Why this Guide to Land Acquisition and Compensation (GLAC) has been prepared?

This GLAC has been prepared to provide people affected by Project-related land acquisition ("Project Affected People" or "PAPs") with a clear and concise overview of **the expropriation process carried out by KGM** in accordance with the Expropriation Law, and summarise the **key principles of the RAP,** particularly regarding additional compensation and assistance measures that go beyond the legally mandated cash compensation to ensure alignment with international standards and Lender requirements.

In addition, this GLAC outlines how affected people can apply to the SPV to access RAP entitlements and convey their grievances, inquiries, and feedback to the Project parties.

There are three versions of the GLAC: (i) for affected lands, (ii) for affected houses, and (iii) for affected businesses. This version is the GLAC concerning affected lands and houses.

B. PROJECT DESCRIPTION

9. What are the key Project Components?

The Project, designed as a **dual carriageway**, has a total length of **117.8 km**, encompassing both the main Motorway (84 km – 2x3 lanes) and connection roads (33.8 km – 2x2 lanes).

Other key Project components include **7** main interchanges, **5** tunnels, **16** viaducts, **22** bridges, **56** overpasses, **43** underpasses, and **308** culverts, with **auxiliary features** including an Operational and Maintenance (O&M) Centre, four Motorway Service Facilities, toll collection areas and temporary construction facilities.

10. Are there any associated facilities of the Project?

There are no additional associated facilities in the current design. Please refer to Question 15 for information regarding temporary facilities to be used during construction.

11. What is Motorway Expropriation Corridor?

The **expropriation corridor** defines the boundaries within which land acquisition and expropriation activities are carried out by KGM for the Motorway and associated connection roads.

All construction activities related to the main Motorway, such as excavation, embankment works, and the installation of permanent infrastructure, are executed within this designated corridor.

The width of the expropriation corridor varies along the route., width the minimum and maximum widths as follows:

- **Minimum width: ~ 55 m**
- **Maximum width: ~450 m** (at the location of service areas)

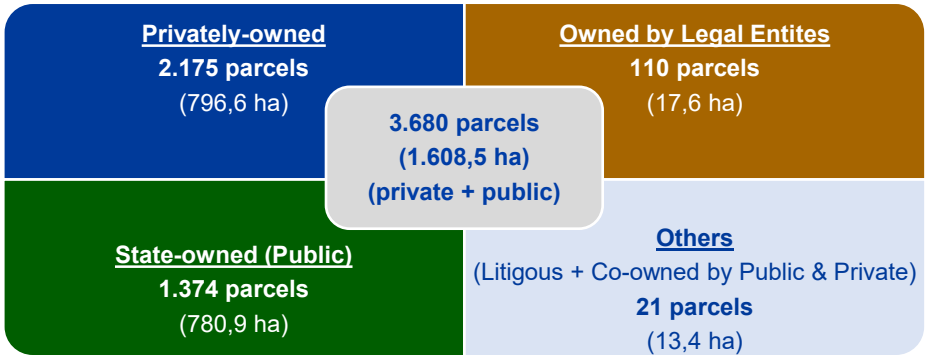
12. Which Settlements are affected within the Expropriation Corridor?

The land acquisition for the Project affects 3 districts and 57 neighbourhoods.

- **Serik (12 neighbourhoods):** Deniztepesi, Sarıabalı, Yukarıkocayatak, Asağıkocayatak, Kayaburnu, Dikmen, Çandır, Asağıçatma, Cumalı, Burmahancı, Üründü, Belpınarı
- **Manavgat: (34 neighbourhoods):** Çakış, Taşağıl, Hocalar, Gündoğdu, Yavrudoğan, Çolaklı, Seki, Kalemler, Evren, Ilıca, Yeniköy, Şişeler, Evrenleryahşi, Dolbazlar, Yukarıışıklar, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacıisali, Hacıobası, Kızılot, Uzunlar, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya
- **Alanya (11 neighbourhoods):** Alara, Cakallar, İncekum, Avsallar, Akdam, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

13. How many Parcels are Affected?

There are **3,659 private, legal entity, and public (state-owned)** parcels to be acquired **within Project's expropriation corridor as well as 21 other parcels within litigation and co-ownership by public and private.**



14. What is the land registry type of affected parcels?

The majority of the affected parcels are registered as **agricultural land**, **road**, and **forest**.

Number of Parcels per Land Registry Type (3.680 parcel)	Area of Parcels per Land Registry Type (1.608,5 ha parcel)
• **Agricultural** (2.718 parcel)	• **Agricultural** (844,2 ha)
• **Non-registered** (413 parcel)	• **Non-registered** (99,4 ha)
• **Forest** (150 parcel)	• **Forest** (554,1 ha)
• **Land with structures** (148 parcel)	• **Land with structures** (42,2 ha)
• **Constructible plot** (169 parcel)	• **Constructible plot** (32,9 ha)
• **Litigous** (21 parcel)	• **Litigous** (13,4 ha)
• **Pasture** (3 parcel)	• **Pasture** (0,2 ha)
• **Others** (58 parcel)	• **Others** (22,1 ha)

15. Which temporary facilities will be required during construction?

During the **construction phase**, the Project will utilise various temporary facilities, including **construction camp sites**, **production plants and facilities** (such as concrete batching plants, crushing/mechanical plants, and asphalt plants), as well as **quarries** and **excavated material storage sites**.

A list of planned facilities is included in the RAP.

Construction Camp Sites	• Temporary Construction Camp (KM 59+500) • Main Construction Camp Site (KM 64+500) • Manavgat Construction Camp Site (KM 87+500) • Alanya Construction Camp Site (124+300)
Plants and Facilities	• 7 concrete plants • 4 crushing/mechanical plants • 3 asphalt plants
Quarries	• 11 potential quarries
Excavated Material Storage Sites	• 20 potential excavated material storage sites

16. How is the private land for temporary facilities acquired by the Project?

Private parcels required for temporary facilities are acquired by the SPV/EPC through rental agreements, mutual protocols, or other similar arrangements made with the landowners or shareholders.

Upon completion of temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed terms.

17. What are key milestones in the Project schedule?

No	Key Milestones / Tasks	Date
0	**BOT Contract Signing, Site Delivery**	14 October 2024
1	**Expropriation**	
1.1	Start of inventory of assets and valuation study commenced by appointed valuation contractor	November 2024
1.2	Start of expropriation procedures – through Article 8 negotiations – by KGM	February 2025
1.3	Completion of valuation	Q2 2026 (*Excluding the zoned sections of the Alarahan and Alanya West connecting roads*)
1.4	Completion of Article 8 negotiations as part of expropriation procedures undertaken by KGM	
	Phase 1: KM 52 – 56; KM 74 – 104; KM ~64 (O&M Centre), KM ~80 (Concrete Plant)	February – August 2025 (***completed***)
	Phase 2: KM 56 – 74; KM 104 – 116; Connection Roads: Manavgat East, D-400, Serik	September 2025 – January 2026
	Phase 3: KM 116 – 141; Connections roads: Taşağıl, Manavgat, Alarahan and Konaklı	Q3 2026 (*target)*
1.5	**Phase 4:** Manavgat, Alarahan, and Alanya West Zoned Section Connection Roads	Q1 2027 (*target)*
2	**E&S Studies and Finance Agreement**	
2.1	Start of ESIA Package studies	March 2024
2.2	Start of RAP studies	April 2025
2.3	ESIA Package Disclosure by SPV, Lenders (60 days)	Q2 and Q3 2025
2.4	Finance Agreement Signing	6 October 2025
3	**Construction Works**	36 months after Signing
3.1	Land entry by the Project for design-related activities	November 2024
3.2	Site Mobilisation and Start of Construction	March 2025
3.3	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
	KM 52+000 – 80+000	November 2027 (*target*)
	KM 80+000 – 114+750	January 2028 (*target*)
	KM 114+750 – 141+705	November 2027 (*target*)
3.4	Tunnels, Viaducts, Superstructure, O&M Centre, Motorway Service Facilities (MSFs) and Other Secondary Works	March 2028
4.	**Motorway Commissioning**	Within 36 months from the date of signing the finance agreement

C. LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS

18. What is the status of land acquisition?

A **Public Benefit Decision** (No: 2023/371) for the Project was declared by the MoTI on **28 November 2023.**

A Presidential Decree (No. 9708) concerning the **Accelerated Expropriation** of certain immovable properties under the scope of the Project (located within the settlements covered by the Decree) by the KGM in line with **Article 27 of the Expropriation Law of Türkiye** (Law No. 2942, 1983) was published in the Official Gazette (No. 32857) on **30 March 2025.**

The **Expropriation Decisions** were taken for the Project by KGM between December 2024 and May 2025.

Pursuant to these decisions, **land acquisition activities for the Project commenced in February 2025**.

- Between February and August 2025, expropriation procedures were initiated for 22% of the **private parcels through Article 8 invitations and negotiation meetings.** and
- KGM has resorted to the **accelerated expropriation** for **3%** of the **private parcels.**
- Forestry permits have been obtained for over 75% of the forest lands located within the Motorway's expropriation corridor.

Planned Schedule of Article 8 Negotiation Meetings

Negotiation Meeting Date	Settlements
Completed between February and September 2025	Serik: Deniztepesi, Sarıabalı, Dikmen
	Manavgat: Şişeler, Taşağıl, Aksaz, Cevizler, Demirciler, Hacıali, Hacıisalı, Hacıobası, Karaöz, Sülek, Aşağıışıklar, Bucakşeyhler, Ulukapı, Yukarıışıklar, Evrenleryavşi, Kalemler, Seki, Yeniköy,
October 2025	Manavgat: Çakış, Çolaklı, Gündoğdu, Hocalar, Yavrudoğan, Taşağıl
November 2025	Serik: Aşağıkocayatak, Çandır, Dikmen, Kayaburnu, Yukarıkocayatak
	Manavgat: Hacıobası, Kadılar, Karakaya, Odaönü, Örenşehir, Uzunlar, Yalçıdibi
Completed between January and February 2026	Serik: Aşağıçatma, Belpınar, Burmahancı, Cumalı, Deniztepesi, Sarıabalı, Üründü
Completed between February and April 2026	Manavgat: Evren, Ilıca, Hocalar, Kalemler
End of 2026 (*Target)*	Alanya: Alara, Çakallar, Akdam, İncekum, Avsallar, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

19. What is the status of land entry and construction?

The site was officially delivered by KGM to the SPV in October 2024, following the signing of the BOT Contract.

After site delivery, design-related activities – including drilling operations– were initiated in **November 2024**.

Site mobilisation for Project construction began in **March 2025**, financed through the Company's own equity.

Currently, **construction works are ongoing primarily on forest parcels**, for which forestry permits have been obtained.

As the expropriation of privately owned parcels is finalised, construction activities are also initiated by the SPV and EPC on those parcels following the compensation payments by KGM, in line with the national Expropriation Law, and the provision of additional support by the SPV under the RAP.

20. What are the potential displacement impacts of the Project and who would be affected?

Permanent or temporary land acquisition for the Project will lead to **physical or economic displacement** for the **owners and/or users (formal or informal)** of the affected lands and structures.

The land acquisition-related impacts are primarily classified under the following:

(i) **Affected lands** (may include non-residential and non-commercial structures)
(ii) **Affected houses** (299 building on 231 parcels with 341 households)
(iii) **Affected greenhouses** (599 greenhouse units on 347 parcels)
(iv) **Affected businesses** (29 businesses to be relocated + 8 roadside local product vendors operating on lands already expropriated by KGM)
(v) **Impacts on vulnerable people**
(vi) **Temporary losses/impacts during construction**, and
(vii) **Impacts during operation**

21. Will there be further land acquisition beyond the current expropriation Corridor?

The Project may require **further land acquisition** beyond the currently defined expropriation corridor, either during construction or, on a limited basis, after commissioning.

In case of future land acquisition requirements, the required land will be acquired by KGM in line with the Expropriation Law. Potential displacement impacts and access restrictions associated with such land acquisition or expropriation will be managed by the SPV – in collaboration with KGM – in accordance with the RAP principles.

22. What are the cumulative land acquisition and resettlement impacts of the Project?

Cumulative land acquisition impacts may arise when landowners or users are affected by multiple, overlapping land-related acquisitions linked to the Project or other developments in the region or directly to the Project.

During RAP implementation, a field-based cumulative impact assessment study will be conducted by the SPV, with support from third-party technical consultants, to make parcel-based identification of affected owners and users, assess and address these impacts under the specific budget allocated by the SPV.

D. EXPROPRIATION PROCESS IN LINE WITH EXPROPRIATION LAW

23. What is the legal basis of the expropriation process?

In the Republic of Türkiye, expropriation is carried out in accordance with **Article 46 of the Constitution** and implemented through the provisions of **Expropriation Law (No. 2942).**

The **Directorate General of Highways (KGM)** is responsible for the expropriation of privately-owned parcels in accordance with Türkiye's Expropriation Law (No. 2942), as well as coordinating the allocation of public parcels.

According to the BOT Contract, the SPV is responsible for covering a portion of the expropriation costs for the Project. The amount to be covered by the SPV is specified in the BOT Contract. Any costs exceeding this specified amount will be covered by KGM.

24. Which procedures does KGM carry out under the Expropriation Law?

Land acquisition is conducted through either negotiated settlement (Article 8) or judicial expropriation.

For detailed information on the expropriation process carried out by the KGM and its procedural steps, please refer to the booklet titled *"**Procedural Steps in Expropriation Activities Conducted by the General Directorate of Highways**"*, which has been distributed by the SPV alongside this GLAC.

25. Who is eligible for compensation under the Expropriation Law?

Under national legislation, the following categories of PAPs are eligible for compensation:

Affected Asset	Eligible PAPs
Private Parcels	• **Owners** of lands, trees, crops, structures on affected lands • **Formal land users** (with official documentation) for trees, structures, crops on affected lands • **Informal land users who have evidence** of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19) • **Litigant owners/shareholders or formal and informal users of litigious parcels**
Public Lands	• **Formal public land users** (who have official documentation, e.g. adequate pay "ecrimisil", rental agreement) for trees, crops, and structure • **Informal public land users who have evidence** of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19)
Houses	• **The owners of the houses** (in case of multiple shareholders, this refers to the actual owner of the house, subject to the consent of other shareholders who recognise the ownership of the actual owner) • **All land shareholders (in proportion to their shares) in case of multiple land ownership**, when there is no consent from other shareholders recognising the ownership of the actual structure owner
Greenhouses	• Owner of the greenhouse – owner/shareholder of the private land • Owner of the greenhouse – formal tenant of the land, owner of the greenhouse • Formal tenant of the greenhouse on lands owned by others (not the owner of the greenhouse) • Owner of the greenhouse – informal user of treasury lands (with no official documentation for land use but can prove their ownership of the structure) • Owner of the greenhouse – informal user of forest and pasture lands or with no official documentation proving their ownership of the structure

E. COMPENSATION AND ENTITLEMENTS UNDER RAP TO MEET INTERNATIONAL STANDARDS

26. What additional compensation and entitlements are provided by the SPV through RAP implementation, beyond those offered by KGM under the Expropriation Law?

In addition to the compensation provided by KGM in accordance with the Expropriation Law, **the SPV implements supplementary compensation and livelihood restoration measures under the RAP** for owners as well as formal and informal users of affected lands, houses, and greenhouses.

The SPV has established a dedicated **RAP Fund** for covering all costs arising from the implementation of additional measures beyond those required under national legislation. This Fund is allocated and managed by SPV, in coordination with KGM.

27. What are the Key Compensation and Assistance principles outlined in the RAP?

- Avoidance of Forced Eviction: The Project will not carry out forced evictions except in accordance with national legislation and the requirements of IFC PS5.
- Prioritisation of Purchase through Negotiated Settlement over Expropriation: KGM has prioritised negotiated settlements through Article 8 (purchase method). Article 27 will be used by KGM as a last resort, only after Article 8 process.
- Compensation at Full Replacement Cost: All compensation to people affected by land acquisition will be provided at full replacement cost. This includes market value plus any applicable transaction costs, as required by Lenders.
- Livelihood Restoration and Assistance in addition to cash compensation: The SPV will provide livelihood restoration and assistance measures to eligible affected people, including owners and users of affected houses and lands, as well as their formal and informal users, in accordance with the requirements of the Lenders.
- Early Consultations and Notification for Land Acquisition Process: Affected houses: The SPV will notify the owners and tenants of affected structures at least **three months** in advance of the commencement of expropriation, in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time (more than six months) for resettlement planning.

  In cases where expropriation has already been concluded, the SPV will inform property owners of the Project schedule. Each owner will be granted a six-month notice period to vacate the property following notification, unless a mutually agreed alternative timeframe is established.

  Affected lands: The SPV will notify **users of affected lands** at least **three months** before land entry.

  Land entry will only proceed after the completion of the expropriation process – including payment – or upon finalisation of mutual agreements.

28. What is Cut-off Date for Eligibility?

The **cutoff date** is the date after which any new structures, trees, crops, and other immovable assets will no longer be counted or measured for compensation purposes.

The cut-off dates are determined **based on the completion date of the census and asset inventory surveys** conducted in each respective settlement. Therefore, the cutoff is specific to each affected settlement.

The SPV posts the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions. These are posted in the offices of the mukhtars, local coffee houses, and other appropriate public venues (such as mosques and community gathering spaces used by local men and women) within the respective affected settlements.

29. Who is Eligible for Compensation and Assistance under RAP?

All people affected by the Project and owning and/or using (formally or informally) the affected lands and assets **before the cut-off dates** defined in the RAP are eligible for compensation and assistance under RAP.

Accordingly, **people who encroach on the Project area after the cut-off date** are **not** eligible for compensation or assistance provided through the implementation of the RAP.

Regarding the affected lands, all persons using the lands for generating agricultural income (including both formal and informal users – regardless of their total productive agricultural area) will be eligible for entitlements and livelihood restoration and improvement measures defined in the RAP.

PAPs who believe they have not been included in the process or are eligible for the entitlements can apply to the Project CLOs with the required documents and an application letter. Their eligibility for compensation and/or assistance will be evaluated by the SPV. After the evaluation, they will be informed of the outcome, and if deemed eligible, they will be granted access to the relevant compensation and/or assistance.

The eligibility categories identified in the RAP are as follows:

Affected Lands	• Landowners (private parcels) • Formal and informal land users (private and public parcels used for agriculture and grazing) • Users of litigous properties • Owners, formal and informal users of orphan and fragmented parcels • Users of forest parcels for economic activity • Owners of affected crops and trees on affected lands • Owners of non-residential and secondary structures on affected lands (maybe formal or informal user of affected land) • Vulnerable landowners and land users • Owners, formal and informal users of parcels acquired through constitution of servitude
Affected Houses	• Owners of affected houses • Formal users of affected houses (tenants) • Informal users of affected houses • Vulnerable households
Affected Greenhouses	• Owner of the affected greenhouse, owner of land • Owner of the affected greenhouse, formal or informal user of the land • Tenant of the affected greenhouses • Vulnerable landowners or land users
Lands subject to Temporary Losses and Impacts during Construction	• Owners of lands and structures affected temporarily • Formal and informal users of and structures affected temporarily • Beneficiaries of infrastructures and services termpoarily affected during construction
Lands and structures subject to impacts during Operation	• Owners or users (formal or informal) of houses that cannot be mitigated to levels compliant with Project standards through operation phase E&S management plans

30. What are the RAP entitlements specific for owners and users of affected private parcels?

- **Owners and Shareholders of Affected Private Parcels**

Under the Expropriation Law of Türkiye, **owners and shareholders** of affected private parcels are entitled to receive cash compensation from KGM for their affected land, structures (after depreciation is deducted), trees and crops that cannot be harvested.

The owners and shareholders of affected private parcels are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- **Assistance in searching replacement land** that is of similar quality, size, and location, subject to availability.
- Compensation to cover **transaction costs** applicable to the acquisition of replacement, if replacement land of similar quality, size, and location is identified by the PAPs who reach an agreement with KGM under Article 8.
- SPV support to cover **small costs** for official expropriation procedures (such as power of attorney costs, working capital fund for title deed transactions, inner and inter city transportation costs, etc.)
- SPV support for **relocating movable assets** to an alternative land determined by PAP.
- **Access to livelihood restoration, improvement and assistance measures** (as outlined under Question 36) provided by SPV through RAP Fund if land is used for economic activity.

> ***Important Note to PAPs**: Regarding expenditures such as transaction costs or small costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Formal and Informal (Agricultural) Users of Affected Private Parcels:**

Under the Expropriation Law of Türkiye, **formal or informal users** of affected private parcels are **not** entitled to receive cash compensation from KGM However, they are compensated for their trees and any structures or fixed improvements/investments (after depreciation is deducted) on the rented land, provided they can demonstrate ownership of these crops and assets.

The users of affected private parcels are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- **Assistance in searching replacement land** that is of similar quality, size, and location, subject to availability.
- **One-off transitional support equivalent to the 1-year rental fee (**including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land
- **For long-term formal tenants** (whether for greenhouses or open fields) who have paid rent in advance, guidance by the SPV regarding the legal procedures to follow to obtain a refund for the unused portion of the rental payment and if the unused portion of the rental payment cannot be obtained from the landowner, compensation of the outstanding amount by the SPV from the RAP Fund (such tenants and their tenancy agreement conditions will be determined by the SPV on a case-by-case basis during RAP implementation).
- **For long-term formal tenants** (whether for greenhouses or open fields), in cases where tenants are subject to fines under their lease agreements due to early termination, support or compensation by SPV to ensure that tenants are not disadvantaged (based on case-by-case review of the specifics of tenancy agreements).
- Notification of the user by SPV **three months in advance of land entry.**
- If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry.
- SPV support for **relocating movable assets** to an alternative land determined by PAP.
- If there are major fixed improvements or investments (*including structures such as barns, sheds, depots, pools, etc.)* made or owned by the **informal user** on the affected land, top-up compensation in addition to the compensation paid by KGM (based on evidence of ownership) – in order to reflect market value as KGM compensates only for the **minimum material cost** under Article 19 of the Expropriation Law.
- Access to **livelihood restoration, improvement and assistance** measures (as outlined under Question 36) provided by SPV through RAP Fund.

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Litigant Owners and Shareholders:**

When there is a court dispute regarding the ownership of a litigious parcel, the rightful owners or shareholders eligible for compensation under the Expropriation Law are determined by the court in accordance with Article 18 of the Law.

The SPV will inform the litigant owners **about the land acquisition process**, as well as their rights and entitlements under this RAP.

Individual consultations will be held with the litigant owners/shareholders of parcels that contain houses and greenhouses to identify any specific vulnerabilities for design and delivery of tailored measures on a case-by-case basis.

The court proceedings will be monitored by SPV to mitigate any potentially exacerbated impacts arising from lengthy legal procedures.

If the case is concluded in favour of the litigant owner, they will be entitled to all RAP entitlements defined for private landowners.

- **Owners of Orphan Lands** (Unacquired parts of Expropriated Parcels)

For the unacquired portions that were not previously included in KGM's expropriation, the owner or shareholder of the affected parcel **has the right to formally apply to KGM**, in accordance with Article 12 of the Expropriation Law, to request the acquisition of the remaining part of the parcel if it is deemed economically unusable or undevelopable.

For all parcels, in line with the Expropriation Law and KGM's established practice, KGM accepts official applications from affected people – submitted within 30 days of receiving notice of expropriation by agreement – requesting the expropriation of orphan lands and evaluates each application on a case-by-case basis.

Relevant requests submitted by landowners to KGM through petitions will be periodically reviewed by the SPV as part of the Project's grievance mechanism. For cases where the acquisition request of the owners or shareholders is not positively concluded by KGM or where relevant grievances or claims are received by the Project, the SPV will engage a third-party valuation expert to review each case/claim individually and determine the actions required to be taken by SPV, if any.

- **Owners of Affected Crops**

According to Article 20 of the Expropriation Law, the evacuation of cultivated lands that are subject to expropriation must take place after the harvest period. If land entry occurs before harvesting, the crop owners are entitled to compensation.

The SPV will notify the crop owners at least **three** months in advance of land entry. If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry.

- **Owners of Affected Trees**

In accordance with the Expropriation Law, cash compensation is provided by KGM to the owner of the trees. Pursuant to Article 19 of the Expropriation Law, when trees are located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, compensation by KGM is paid to the possessor of the trees. This does not apply to trees on forest or pasture parcels.

The owners of affected trees are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

  - Notification of the tree owners at least **three** months in advance of land entry.
  - If land entry by the Project is required before the end of the harvesting period of the fruit trees, **cash compensation for unharvested products** (e.g., fruits) prior to land entry.
  - For fruit trees owned by informal users on **forestry or pasture lands**, which are not subject to compensation by KGM, **determination of the product value by a third-party valuation expert** commissioned by the SPV and provision of cash compensation reflecting this value to the informal users by the SPV from the RAP Fund.
  - Where needed, top-up cash compensation to compensate dense planting deduction applied by KGM, if any.
  - Commissioning of **third-party valuation expert** by the SPV for the verification of compliance of tree valuation with international standards, or and determination of the actions required to be taken by the SPV, where needed.
  - Commissioning of **third-party valuation expert** by the SPV for the review of any grievance, claim, or request raised during Article 8 negotiation meetings related to orchard valuation, and determination of the actions required to be taken by the SPV (such as provision of top-up compensation to cover any compensation gap with international standards), where needed.

- **Owners of major non-residential/secondary structures** (may be the owner or formal or informal user of land)

In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. Depreciation is applied. As per Article 19 of the Expropriation Law, for buildings or structures located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, the minimum material cost of the structure is paid to the possessor.

The owners of *major* non-residential/secondary structures (*including structures such as barns, sheds, depots, pools, etc.)* are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

  - **Top-up cash compensation** to the structure owner (may be the land owner or formal land user with evidence) in order to cover the amount deducted for depreciation.
  - If there are major fixed improvements or investments made or owned by the **informal user** on the affected land (with proof of structure ownership), provision of **top-up compensation** by SPV in addition to the compensation paid by KGM – in order to reflect market value as KGM compensates only for the **minimum material cost** under Article 19 of the Expropriation Law.
  - **If the assets owner (informal land users) cannot prove her/his ownership claim,** commissioning of **third-party valuation expert** by the SPV for the review of the case and determination of market value for these assets for provision of cash compensation at full replacement cost by the SPV from the RAP Fund.

- **Owners of parcels to be acquired through constitution of servitude** (easement rights)

In accordance with Article 4 of the Expropriation Law, instead of acquiring full ownership of immovable assets, easement rights may be established through expropriation on a specific section, height, depth, or source of the immovable, provided that such rights are sufficient to serve the intended purpose.

Cash compensation is paid to the owners/shareholders for the alignments. As stipulated by the Law, ownership rights remain with the landowner, subject to the implementation of necessary safety measures.

They will be entitled to access livelihood restoration, improvement, and assistance measures provided by the SPV through the RAP Fund.

31. What are the RAP entitlements specific for the formal and informal users of affected public parcels?

Formal and informal users of public parcels are entitled to the same entitlements as those provided to formal and informal users of affected private parcels, as outlined under Question 30.

Additionally, if there are major fixed improvements or investments (*including structures such as barns, sheds, depots, pools, etc.)* made or owned by the informal user on the affected land – **excluding those on forest and pasture lands** – top-up compensation will be provided by the SPV from the RAP Fund to the informal user (based on evidence of structure ownership) – in order to reflect market value as KGM compensates only for the **minimum material cost** under Article 19 of the Expropriation Law.

If the trees and assets owned by informal users are located **on forestry or pasture lands**, which are not subject to compensation by KGM, their market value will be determined by a third-party valuation expert to be commissioned by the SPV. Cash compensation reflecting this value will be provided to the informal users by the SPV from the RAP Fund.

32. What are the Specific RAP Entitlements specific for the Owners and Users of Affected Houses?

- **Owners of Affected House on Private Parcels**

In accordance with the Expropriation Law, cash compensation by KGM is provided to owners. Depreciation is applied.

In cases of joint landownership, compensation is paid to the owner of the structure who is the actual resident, provided that he or she has obtained formal consent from the other co-owners confirming ownership rights. If such consent is not available, cash compensation is distributed among all landowners in proportion to their registered shares.

The owners and users of **affected houses** are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Top-up cash compensation** to cover the amount deducted for depreciation by KGM and achieve full replacement cost.
- In case of joint landownership, help the actual resident engage – and, if possible, reach an agreement with other shareholders – with support from KGM officials, to ensure that the house owner (actual resident) receives compensation for the house at full replacement cost or provided with a replacement house; if the house owner (actual resident) cannot receive full compensation, top-up compensation by the SPV from the RAP Fund.
- **House Relocation Support Package provided prior to relocation** to cover title deed transfer costs, real estate agent service fee and allowance for other relocation related expenses such as utility subscription fees, registration, etc.
- **Assistance in searching a replacement residential house of equal or greater value or identifying suitable replacement land** for the construction of a new house at acceptable standards, including facilitation of coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel on which the house can be built with security of tenure.
- **Allowance for moving and travel costs**
- Right granted to PAPs to **salvage recoverable building materials** from expropriated structure prior to demolition.

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Formal (tenants with formal tenancy agreements) and Informal Users of Affected House on Private Parcels**

In accordance with the Expropriation Law, no compensation is provided to tenants. However, the owner and tenant may reach a separate agreement based on the terms and conditions of the tenancy contract.

The formal users (tenants) of **affected houses** are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **House Relocation Support Package provided prior to relocation** to cover rental allowance (three-month rent allowance, based on the market rental rate of the replacement house to be rented), real estate agent service fee (equivalent to the market rental rate of the replacement house to be rented), allowance for other relocation related expenses such as utility subscription fees, tenancy registration, etc. and allowance for unforeseen expenses (such as fixed investments made by the renter)
- **Assistance in searching a replacement residential house**
- **Allowance for moving and travel costs** based on submitted evidence or documentation, at the time the expenses are incurred
- Right granted to PAPs to **salvage recoverable building materials** – if such materials belong to the tenant – from expropriated structure prior to demolition.

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Owners of Affected House (Informal Users) on Public Parcels (Treasury, Forest, Pasture or Non-registered Parcels)**

In accordance with the Expropriation Law, **no compensation** for **land** is provided to owners of informal houses. However, informal users – **excluding those occupying forest and pasture lands** – are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at minimum material cost, in accordance with Article 19 of the Expropriation Law, provided they can demonstrate ownership of these assets. Informal users of **forest and pasture lands** are considered as illegal occupants, thus are not entitled to any form of legal compensation for either the land or the assets.

The owners of **affected houses** on public parcels (informal users) are entitled to receive the following compensation and assistance from the SPV under the RAP:

- **Notification** at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Top-up compensation** by SPV in addition to the compensation paid by KGM – in order to reflect market value as KGM compensates only for the **minimum material cost** under Article 19 of the Expropriation Law (***for informal houses on treasury and non-registered parcels***)
- **Cash compensation at full replacement value** will be provided by the SPV from the RAP Fund to the structure owner (based on evidence of structure ownership) (***for informal houses on forest and pasture parcels***)
- **House Relocation Support Package provided prior to relocation** to cover allowance for other relocation related expenses such as utility subscription fees, registration, etc. as well as unforeseen costs such as fixed investments made by the informal house owner.
- **Assistance in searching a suitable replacement residential house** or **identifying suitable replacement land** (such as treasury, non-registered or other) for the construction of a new house at acceptable standards.
- **Assigning civil engineers and technicians from SPV and EPC teams to advise and supervise affected individuals who prefer to construct their own houses** (to provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding; where necessary and appropriate, construction machinery and equipment may be temporarily provided to assist affected households during the construction of their replacement homes)**.**
- **Allowance for the moving and travel costs** based on submitted evidence or documentation, at the time the expenses are incurred
- Right granted to PAPs to **salvage recoverable building materials** from expropriated structure prior to demolition.
- **Access to livelihood restoration, improvement and assistance measures** (as outlined under Question 36) provided by SPV through RAP Fund, if the affected land – on which the impacted house is located – was used for agricultural purposes.

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Physically Displaced Households with Vulnerable Members**
  - **Individual information** about the Project, land acquisition, RAP entitlements, and the grievance mechanism and specific attention to vulnerable members during consultation, negotiation and post-resettlement monitoring processes.
  - **In-kind support** by SPV to be determined based on the type of vulnerability and Specific measures to be designed according to specific vulnerabilities of household members to ensure comfort during relocation.
  - **Provision of logistical and administrative support** to facilitate key processes through the Project CLOs and other appropriate in-house personnel, particularly during residency registration, school enrolment and education-related processes, access to health services through local family health centres, utility subscriptions and connections (electricity, water, gas, etc.)
  - **Facilitation of consultations with relevant governmental authorities** to identify alternative land for constructing replacement housing or to locate available housing options, with particular attention to the needs of elderly and women-headed households.
  - Priority to at least one member of households (who is looking for a job and meeting Project's employment criteria) in **Project employment during construction phase.**

33. What are the Specific RAP Entitlements specific for the Owners and Users of Affected Greenhouses?

- **Owners of the Greenhouses – who own the Land**

In accordance with the Expropriation Law, cash compensation for greenhouses is provided by KGM to the owner of the greenhouse. Depreciation is deducted. In this Project, for parcels containing **greenhouses**, the parcel may be expropriated fully if the remaining area is **less than 400 m²** – subject to application by the PAPs and evaluation by KGM.

The owners of affected greenhouses – who own the Land – are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Notification of the crop owners at least **three** months in advance of land entry.
- Top-up cash compensation to cover the amount deducted for **depreciation**;
- If not included in the expropriation value provided by KGM, additional cash compensation at full replacement cost to cover the cost of fixed (non-movable) investments and improvements made by the greenhouse owner, such as irrigation, heating, drainage, lighting system and components, etc. – a third-party valuation expert commissioned by the SPV will determine the associated costs on market prices.

- Compensation for costs incurred by greenhouse owners – whose greenhouses are partially expropriated – to support repair and adjustment works on the remaining portions, such as the rearrangement of irrigation or drainage systems, repair of greenhouse nylon covers, and similar interventions.
- If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry. If the greenhouse is partially affected, crop compensation will be provided for the affected part.
- Assistance in searching a replacement site for the relocation of the greenhouse, if such relocation is planned by the greenhouse owner.
- If requested by the PAPs, support for the preparation of the land where the greenhouse will be reestablished – this may include the provision of construction machinery and labour, land levelling, provision of suitable topsoil stripped from Project areas, infrastructure connections for electricity, water, other utilities, etc.
- Assistance for rearranging the greenhouse to ensure continuity of operations (rearrangement of irrigation system, drainage system, heating system, etc.), if requested, if the greenhouse is partially affected and the owner continues operations on the remaining land.
- Arranging the full relocation or reimbursement of the moving costs (disassembly-assembly) incurred by the greenhouse owners for their movable assets and infrastructure components (such as movable irrigation system components), through direct payment to vendors or based on submitted evidence or documentation, at the time the expenses are incurred.
- **Access to livelihood restoration, improvement and assistance measures** (as outlined under Question 36) provided by SPV through RAP Fund.
- Information of the landowners and shareholders about their right to apply for the acquisition of orphan land in accordance with the Expropriation Law and coordinating consultations with KGM to facilitate the acquisition of the remaining portion – subject to evaluation and approval by KGM.

- **Owners of the Greenhouses – who are formal user (tenant) of the Land**

In accordance with the Expropriation Law, cash compensation for greenhouses is provided by KGM to the greenhouse owner, provided that the greenhouse owner holds a formal tenancy agreement or has obtained formal consent from the landowner.

The owners of affected greenhouses – who are formal users (tenants) of the Land – are entitled to all relevant entitlements outlined for the "**Owners of the Greenhouse – who own the Land**".

They are further entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- **One-off transitional support equivalent to the 1-year rental fee (**including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land with affected greenhouse.
- **For long-term formal tenants** who have paid rent in advance, guidance by the SPV regarding the legal procedures to follow to obtain a refund for the unused portion of the rental payment and if the unused portion of the rental payment cannot be obtained from the landowner, compensation of the outstanding amount by the SPV from the RAP Fund (such tenants and their tenancy agreement conditions will be determined by the SPV on a case-by-case basis during RAP implementation).
- **For long-term formal tenants** in cases where tenants are subject to fines under their lease agreements due to early termination, support or compensation by SPV to ensure that tenants are not disadvantaged (based on case-by-case review of the specifics of tenancy agreements).

> ***Important Note to PAPs**: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Formal Tenant of the Greenhouses on lands owned by others – not the owner of the greenhouse**

In accordance with the law, no compensation for greenhouses is provided to the tenants of the greenhouses on land owned by others. However, the greenhouse owner and tenant may reach a separate agreement based on the terms and conditions of the tenancy contract.

They are entitled to all relevant entitlements outlined for the "Owners of the Greenhouse – who are formal user (tenant) of the Land" **but not entitled to** any "Top-up Cash Compensation to achieve Full Replacement Value of the Structures".

- **Owners of the Greenhouses – who are informal users of Treasury Lands** (with no official documentation for land use but can prove their ownership of the structure)

As per Article 19 of the Expropriation Law, for buildings/structures on lands with title deeds belonging to others, lands which do not have owners, and/or lands not acquired by their possessors, minimum material cost of the structure is paid to the possessor.

They are entitled to all relevant entitlements outlined for the "**Owners of the Greenhouse – who own the Land**"

They are further entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- Top-up cash compensation to reflect market value and achieve full replacement cost of the assets, as KGM pays for minimum material cost as per Article 19 of the Expropriation Law – a third-party valuation expert commissioned by the SPV will determine the replacement cost at market value.
- **One-off transitional support equivalent to the 1-year rental fee (**including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land with affected greenhouse

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

- **Owners of the Greenhouses – who are informal users of Forest and Pasture Lands or who cannot prove her/his ownership claim**

In accordance with the Expropriation Law, **no compensation** for land or structures is provided as informal users of forest and pasture lands are considered as illegal occupants and they are not entitled to any form of legal compensation for either the land or the assets.

They are entitled to all relevant entitlements outlined for the ““**Owners of the Greenhouse – who own the Land**” **but not entitled to** any “Top-up Cash Compensation to achieve Full Replacement Value of the Structures”.

They are entitled to receive the following compensation and assistance from the SPV under the RAP:

- For greenhouses owned by informal users are on forestry and pasture lands, which are not subject to compensation by KGM, or if the greenhouse owner (informal land users) cannot prove her/his ownership claim, determination of the market value of the affected greenhouse by a **third-party valuation expert** commissioned by the SPV and provision of cash compensation reflecting this value by the SPV.
- **One-off transitional support equivalent to the 1-year rental fee (**including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land with affected greenhouse

> ***Important Note to PAPs****: Regarding expenditures such as transaction or other costs, the Project will make direct payments to authorities or vendors where possible. If reimbursement is required, PAPs must submit evidence of expenditures to the SPV/EPC. For more information, please contact the Project CLOs using the details provided at the end of this GLAC.*

34. What specific RAP entitlements are available for people affected by construction impacts?

The SPV and construction (EPC) contractors (including subcontractors) will implement measures specified in the Project ESIA, ESMP and subject-specific management plans to avoid, and where avoidance is not possible minimise and/or compensate the impacts on people and environment.

PAPs may contact Project CLOs through contact information provided at the end of this GLAC to submit their construction-related grievances and feedback through Project’s Grievance Mechanism.

The RAP entitlements to be provided by the SPV through implementation by the party causing the damages and losses that cannot be avoided during construction will be as below:

- **Private owners/shareholders of lands to be used temporarily during construction (including access restrictions)** will be provided with cash compensation for the use of land and any economic activity (cost of crops, trees, infrastructure etc. at market prices) based on mutual agreements /rental agreements.
- **Formal and informal users of public and private lands to be used temporarily during construction** will be compensated for crops, trees and structures, provided with 1-year rental support for the lost agricultural area and access to livelihood restoration measures defined under RAP.
- **Owners and formal/informal users of lands and assets damaged by construction** will be compensated at full replacement value for any damage on properties.

35. What Type of Assistance will be Provided to Vulnerable Groups and Individuals?

Households with vulnerable members will be provided by the SPV with special support and/or assistance on a case-by-case basis.

- **In-kind support** (e.g. agricultural input materials, tailored support packages) to vulnerable households identified during RAP preparation and implementation.
- **For vulnerable households affected by physical and/or economic displacement, priority** for all livelihood restoration, improvement, and assistance measures outlined in the RAP.
- Specific attention to vulnerable people during information, consultation, negotiation and post-resettlement monitoring processes through individually informing vulnerable PAPs about the Project, land acquisition process, RAP entitlements/support, and the grievance mechanism.
- Timely updates regarding expropriation status and court decisions, based on notifications received from KGM.
- Assistance with applications to KGM for acquisition of remaining, unusable land parcels (orphan lands), including help with documentation, communication, and logistics.
- Support in completing legal and administrative procedures to enable timely access to expropriation payments.
- Facilitation of access to legal advice and public institutions, including assistance with preparing and submitting required documentation.
- In case the vulnerable PAPs own non-residential structures affected by the Project (e.g. barns, sheds, etc.), in-kind support and assistance for reconstruction of the affected structure at an available location to be indicated by the vulnerable PAP
- Assistance in identifying and applying to existing government or third-party support programs targeting vulnerable individuals or households
- For physically displaced households with vulnerable members, logistical and administrative support to facilitate key processes, such as assistance with facilitating consultations with relevant governmental authorities to identify alternative land for constructing replacement housing or to locate available housing options, with particular attention to the needs of elderly and women-headed household, residency registration, school enrolment and education-related processes, access to health services through local family health centres, and utility subscriptions and connections (electricity, water, gas, etc.)
- Where needed or requested, support to individuals in opening bank accounts to facilitate direct access to compensation and support payments.
- Priority for unemployed female members of physically and/or economically displaced households who are actively seeking employment.
- Training programmes to be designed and delivered by the external Agricultural Consultancy Companies
- Women-specific training programmes

36. What types of Livelihood Restoration, Improvement, and Assistance Packages are available to Agricultural Land Users in relation to their affected lands?

Livelihood restoration, improvement, and assistance will be provided to people who use the affected agricultural lands – including both formal and informal users of open fields and greenhouses. These measures aim to help them return to their previous income levels, or improve their livelihoods where possible.

The support packages available to agricultural land users will include the following measures:

Livelihood Restoration, Improvement and Assistance Packages for Affected Lands					
Package 1	**Package 2**	**Package 3**	**Package 4**	**Package 5**	**Package 6**
External Agricultural Consultancy Support (for 36 months)	Agricultural Training Programs	Distribution of Seedlings, Agricultural Inputs and Materials	Transitional (One-year) Rental Support for Replacement Land	Crop Payments	Priority in Project Employment

All individuals using the affected lands to generate agricultural income – including both formal and informal users, regardless of the total size of their productive agricultural area – will be eligible for the entitlements and livelihood restoration and improvement measures defined in the RAP.

As RAP implementation progresses, consultations between the SPV and affected individuals will continue on an ongoing basis.

Livelihood restoration and improvement measures will be updated as necessary.

Vulnerable households affected by physical and/or economic displacement will be prioritised for all livelihood restoration, improvement, and assistance measures outlined in the RAP. Tailored support and assistance for vulnerable households and individuals

37. How will eligible PAPs be identified, and which documents will be requested from them for eligibility evaluation and decision-making?

During RAP implementation, the SPV will proactively engage with the PAPs to identify potential eligible people and inform them about the livelihood restoration, improvement and assistance measures available to them and requested documents. The eligibility of PAPs to benefit from RAP entitlements – including livelihood restoration, improvement, and assistance packages – will be evaluated by the SPV on a case-by-case basis.

Important Note to PAPs: *PAPs may also contact the Project CLOs using the contact information provided at the end of this GLAC to request further information, share suggestions, or express their interest in participating in the relevant support packages.*

The documentation requested from PAPs for the evaluation of their eligibility for RAP entitlements may include, but is not limited to, the following. It should be noted that this list is not exhaustive, and the SPV reserves the right to request additional documentation at any stage of the eligibility assessment process:

Affected Agricultural Land Users	• Official documentation of ownership for the affected assets such as lands, greenhouses, etc. (e.g., land registry records/title deeds, inheritance documents, ownership documents) (*for owners*) • Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor (*for owners, formal and informal users*) • Tenancy agreements (*for formal users*) • Evidence/confirmation of land use provided by settlement heads, community leaders, and other credible witnesses or third parties (*for informal users*) • Documentation on transaction costs (*for owners, formal and informal users*) • Evidence of expenditures made for fixed investments and improvements (*for greenhouse owners*)
Affected Houses	• Title deeds for affected land and structures (*for owners*) • Documentation on expenses such as moving and transaction costs, fees paid to authorities and service providers, and price quotes from vendors and other transaction costs (*for owners, formal and informal users*) • Evidence of expenditures made for fixed investments and improvements (*for owners, formal and informal users*) • Lease agreements and relevant documentation/confirmation from the structure owner, mukhtar or other credible witnesses (*for formal users - tenants*)

F. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

38. How will PAPs and interested parties be engaged during the Disclosure Period and RAP implementation period?

The Project has a **Stakeholder Engagement Plan (SEP)** disclosed at the Project website (www.antalyaalanyaotoyolu.com.tr)

The RAP separately includes a detailed **Stakeholder Engagement Action Plan** for RAP disclosure and implementation phases. The following RAP specific disclosure activities are conducted:

- The RAP (including the GLAC) **will be published in English and Turkish on the SPV and Lenders' websites**, in line with their disclosure policies and timelines.
- This GLAC, explaining the entitlements and next steps clearly to all affected people and stakeholders, will be delivered to the offices of mukhtars and directly to affected people and vulnerable individual in each settlement.
- The **hard copies (in Turkish)** of the final RAP and GLAC will be made available at the following locations: Project Information Office in Serik, Project's Construction Camp Sites, and Offices of the settlement heads (mukhtars)
- The **SPV CLOs will engage individually with affected households that include vulnerable members** to distribute the GLAC and communicate the key information from the RAP, as applicable.
- Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions prior to Article 8 negotiation meetings. **Priority will be given to settlements where land was or will be expropriated, as listed in the table below under the "**Priority Settlements to be covered during the Disclosure Period".
- Meetings in other settlements will continue throughout the first year of RAP implementation, in alignment with the expropriation and construction schedules.
- **The Project will continue engaging with affected people throughout the 36-month RAP implementation period** in line with the RAP Stakeholder Engagement Action Plan for RAP.

G. PROJECT GRIEVANCE MECHANISM

39. How can stakeholders submit complaints and feedback about land acquisition to KGM?

KGM, as the authority responsible for expropriation, collects and manages all complaints, objections, and feedback related to land acquisition in line with its official procedures.

Stakeholders can submit land acquisition-related complaints and feedback to KGM through **KGM's institutional grievance channels**, which operate **in parallel with the Project's own grievance mechanism**.

Complaints related to expropriation, valuations, or compensation procedures carried out by KGM can be submitted **directly to KGM** through official channels, including:

- Through KGM's online grievance system: https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx
- Direct applications or petitions to **KGM 13th (Antalya) Regional Directorate** (Expropriation Department):
  - Mail or in-person application: Fabrikalar Mah. Gazi Bulvarı 07090, Kepez, Antalya, Türkiye
  - Phone: +90 242 320 70 00 Fax: +90 242 345 36 99
  - E-mail: bol13@kgm.gov.tr

In addition, stakeholders may submit grievances through the Presidency's Communication Centre (CIMER – https://www.cimer.gov.tr/ or 150). While CIMER is a national-level centralised communication platform, any land acquisition-related grievances submitted via CIMER are forwarded to and handled by KGM through internal coordination systems.

The grievances that fall under KGM's legal responsibility will be managed under **national administrative and legal procedures**, separate from the Project's grievance process.

The SPV does **not have a mandate to intervene** in grievances that fall under KGM's legal authority. If PAPs submit such complaints to the SPV, the SPV will guide them to the correct channels. When needed, the SPV will forward these complaints to KGM in writing.

40. Is there a Project-specific Grievance Mechanism and how can stakeholders submit their land acquisition-related complaints and feedback to SPV?

Yes, the **SPV has set up a Project-specific Grievance Mechanism** as part of the ESIA process, alongside the preparation of the RAP. This mechanism is used to collect and manage complaints and feedback related to the **SPV's areas of responsibility**, including RAP implementation and construction-related impacts.

This Mechanism is accessible to all stakeholders, including Project-Affected Persons (PAPs) and vulnerable individuals.

Grievances related to formal expropriation or compensation procedures under the legal responsibility of KGM and **must be submitted directly to KGM.**

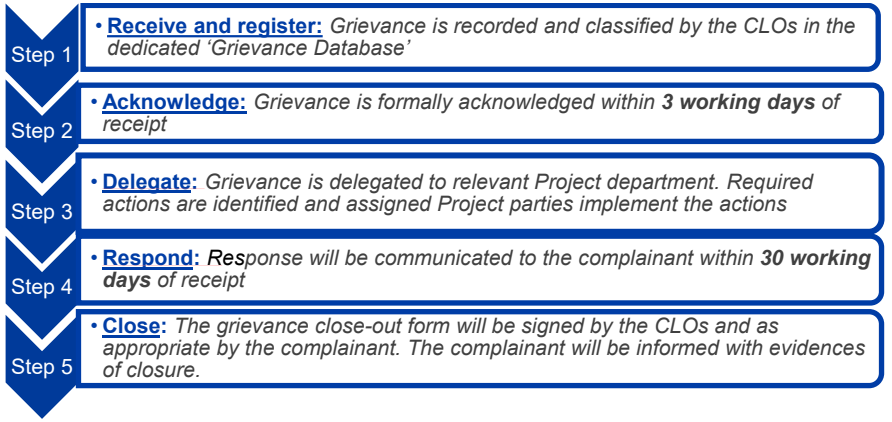
Through this mechanism, stakeholders can submit their concerns using the **channels listed below in Section H "CONTACT INFORMATION FOR STAKEHOLDERS"**

Any grievance and feedback (verbal or written) lodged or conveyed through different channels will be registered in the Project Grievance Database and managed as per the Project SEP, **by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).**

This Mechanism does not replace citizens' right to apply to other formal mechanisms including courts, CIMER) and Antalya Metropolitan Municipality's portal and call centre, among others.

41. What are the steps of the Project's Grievance Mechanism and how are complaints handled?

Key steps and timeframes of the Project Grievance Mechanism are presented below.



42. What appeal mechanisms are available if a grievance is not resolved to the satisfaction of the complainant?

If a grievance is not resolved to the satisfaction of the complainant, the Project offers an appeal mechanism. In such cases, the SPV will launch a second-tier review involving relevant authorities, third-party experts, or academics as independent parties. Based on their recommendations, the SPV will take appropriate action to resolve the grievance.

H. CONTACT INFORMATION FOR STAKEHOLDERS

Stakeholders can contact the Project and submit their questions, complaints, or feedback through the following communication channels:

Project website	**www.antalyaalanyaotoyolu.com.tr**
E-mail	**info@antalyaalanyaotoyolu.com**
Mail	**Ankara – Centre:** Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye **Ankara – Office:** Koç Kuleleri, Söğütözü Mah. Söğütözü Cad. No:2 A Blok, Kat 9, Ofis No 92 (A-9 T.H.) Çankaya, Ankara, Türkiye **Antalya – Campsite:** Taşağıl Mah. Mihrap Cad. No:20, Manavgat, Antalya, Türkiye
Phone (toll free line)	**+90 850 202 07 07**
Mobile Phone (SPV – CLOs)	**+90 534 466 49 93** **+90 534 377 92 82** **+90 537 255 65 98**
Grievance boxes and forms	Grievance and feedback boxes and forms are placed and maintained by the SPV in all affected settlements, at relevant work and mobilisation sites, and in mobile Project vehicles.
Social media	**Linkedin:** https://www.linkedin.com/company/antalyaalanyaotoyolu/ **Instagram:** https://www.instagram.com/antalyaalanyaotoyolu/ **Youtube:** https://www.youtube.com/@AntalyaAlanyaOtoyolu

ANTALYA ALANYA MOTORWAY

www.antalyaalanyaotoyolu.com.tr