GEM Sustainability Services and Consultancy Inc.

Antalya-Alanya Motorway Project

Resettlement Action Plan (RAP) Draft

Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.

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Table of Contents

Abbreviations 11
1. Introduction 13
2. Project Description 15
2.1. Project Location and Route 17
2.2. Expropriation Corridor 22
2.3. Project Components 23
2.3.1. Interchanges 25
2.3.2. Tunnels 25
2.3.3. Viaducts 26
2.3.4. Bridges 27
2.3.5. Overpasses, Underpasses and Culverts 28
2.3.6. Operation and Maintenance Centre 28
2.3.7. Motorway Service Facilities (MSFs) 28
2.3.8. Excavated Materials Storage Sites 29
2.3.9. Temporary Construction Facilities 32
2.3.9.1. Construction Camp Sites 34
2.3.9.2. Plants and Facilities 35
2.3.9.3. Quarries 37
2.3.10. Associated Facilities 40
2.5. Project Schedule 41
2.6. Current Construction Status 43
2.7. Past Land Acquisition 46
2.8. Current Land Acquisition Status 46
2.8.1. Privately-owned Parcels 48
2.8.2. State-owned Parcels 50
2.8.3. Parcels Owned by Legal Entities 52
2.8.4. Court Cases as per Expropriation Law 54
2.9. Zoning Plan Implementation 55
2.10. Avoidance and Minimisation 58
3. Project Impacts 66
3.1. Affected Settlements 72
3.2. Potential Displacement Impacts 74
3.2.1. Affected Lands (within Expropriation Corridor) 74
3.2.1.1. Affected Parcels per Ownership and Land Registry Type 74
3.2.1.1.1. Private Owners 75
3.2.1.1.2. Legal Entities 77
3.2.1.1.3. State-owned – Forestry 78
3.2.1.1.4. State-owned – Pasture 79
3.2.1.2. Orphan Lands 80
3.2.1.3. Fragmented Parcels 84
3.2.1.4. Affected Trees 87
3.2.1.5. Informal and Formal Users of Affected Lands 90
3.2.2. Affected Structures 91
3.2.2.1. Affected Houses 93
3.2.2.2. Affected Greenhouses 97
3.2.2.3. Affected Businesses 99
3.2.2.4. Affected Non-residential Structures 107
3.2.3. Displacement of Existing Infrastructure Belonging to Other Institutions 107
3.2.4. Overhead Energy Transmission Line (OHTL) Displacement 108

3.2.5. Gender Impacts and Gender-based Violence and Harassment (GBVH) Risk 109
3.3. Cumulative Land Acquisition and Resettlement Impacts 113
3.4. Potential Additional Expropriation Works and Change Management 116
3.5. Limitations 117
4. Institutional and Legal Framework 118
4.1. Institutional Framework 118
4.2. National Legislation 120
4.2.1. Constitution of the Republic of Türkiye 120
4.2.2. Expropriation Law of Türkiye (No. 2942, 1983) 121
4.2.3. Resettlement Law of Türkiye (Law No. 5543, 2006) 127
4.2.4. Other Laws relevant to Land Use, Acquisition, and/or Registration 127
4.3. International Standards 127
4.3.1. IFC Policy on E&S Sustainability 128
4.3.2. Equator Principles 4 (2020) 128
4.3.3. Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (2024) 128
4.3.4. OECD Common Approaches (2016) 129
4.3.5. Gap Analysis between National Legislation and International Standards 130
5. Baseline Studies 141
5.1. Methodology of Baseline Surveys 141
5.1.1. Desk-based Review 142
5.1.2. Resettlement-Scoping Field Visit 142
5.1.3. RAP Field Surveys 145
5.1.3.1. Campaign 1 – RAP Surveys by RAP Consultant Team (May 2025) 145
5.1.3.2. Campaign 2 – RAP Surveys by SPV's Implementation Partner (May 2025) 148
5.1.3.3. Campaign 3 – RAP Implementation (after signing of the finance agreement for the Project) 149
5.1.4. RAP Field Survey Limitations 149
5.2. Socio-economic Baseline 152
5.2.1. Geographical Overview 152
5.2.2. Administrative Organisation 154
5.2.3. Affected Settlements 154
5.2.3.1. Population of Neighbourhoods 155
5.2.3.2. Population Growth Trends 156
5.2.3.3. Demographic Profile: Age 158
5.2.3.4. Typology by Proximity to Major Centres 158
5.2.3.5. Livelihood Sources 160
5.2.3.5.1. Agriculture 160
5.2.3.5.2. Livestock (Animal Husbandry) Activities 161
5.2.3.5.3. Employment in Industry 163
5.2.3.5.4. Government Employment 164
5.2.3.5.5. Trade 164
5.2.3.5.6. Pensions 164
5.2.3.5.7. Tourism 165
5.2.3.5.8. Fishing Activities 165
5.2.3.6. Grazing Areas 166
5.2.3.7. Unemployment 167
5.2.3.8. Temporary Population 168
5.2.3.9. Refugees 168
5.2.4. Physically Displaced Households 169
5.2.4.1. Number of Affected Persons and Average Household Size 169
5.2.4.2. Respondents' Profile 170

5.2.4.3. Land Tenure and Ownership 170
5.2.4.4. Structure Tenure and Ownership 170
5.2.4.5. Inheritance and Succession Status 172
5.2.4.6. Residence Status: Permanent or Temporary 172
5.2.4.7. Ownership of Another House 172
5.2.4.8. Income Sources 173
5.2.4.9. Agricultural Activities on Affected Parcels 173
5.2.4.10. Relocation Challenges 174
5.2.4.11. Relocation Expenses 174
5.2.4.12. Relocation Support Needs 176
5.2.4.13. Project Awareness 177
5.2.4.14. Project Perception 177
5.2.5. Economically Displaced Households 178
5.2.5.1. Number of Affected Persons and Average Household Size 178
5.2.5.2. Respondents' Profile 178
5.2.5.3. Land Tenure and Ownership 179
5.2.5.4. Inheritance and Succession Status 179
5.2.5.5. Income Sources 180
5.2.5.6. Agricultural Activities on Affected Parcels 180
5.2.5.7. Total Productive Area 182
5.2.5.8. Investment Plans in Remaining or Alternative Landholdings 183
5.2.5.9. Support Needs and Requests for Other Landholdings 183
5.2.5.10. Sources of Information on Local Land Sales 183
5.2.5.11. Project Awareness 184
5.2.5.12. Project Perception 185
5.2.6. Physically Displaced Businesses 186
5.2.6.1. Relocation Challenges 186
5.2.6.2. Relocation Expenses 187
5.2.6.3. Relocation Support Needs and Special Requirements 188
5.2.6.4. Fixed Investments and Infrastructural Improvements done at the Affected Premises 188
5.2.6.5. Licensing and Regulatory Renewal Requirements 188
5.2.6.6. Relocation Preferences 189
6. Valuation and Compensation Methodology 190
6.1. Key Compensation and Assistance Principles 190
6.2. Census and Inventory of Assets 194
6.3. Valuation 195
6.3.1. Key Valuation Provisions of the Expropriation Law 196
6.3.2. Valuation Methodology of KGM 196
6.3.3. Review of Project's Valuation Study 197
6.3.4. Future Valuation Updates 201
6.4. Avoidance of Forced Eviction and Procedure for Lawful Evictions 202
7. Eligibility and Entitlements 205
7.1. Eligibility 205
7.2. Cut-off Date 211
7.3. Entitlement Matrix 215
8. Livelihood Restoration and Improvement 240
8.1. Affected Lands (including Open-field and Greenhouses) 241
8.2. Affected Businesses – Business owners and Employees 255
8.3. Community Development 262
9. Resettlement Sites 264
10. Stakeholder Engagement and Information Disclosure 267

10.1. Previous Engagement and Information Disclosure 267
10.1.1. Expropriation Process 267
10.1.2. Engagement between the SPV and KGM 268
10.1.3. Project-specific Actions taken by SPV to date 270
10.1.4. RAP Preparation 270
10.2. Engagement and Information Disclosure during Disclosure Period 271
10.3. Stakeholder Engagement Action Plan 273
11. Grievance Management Mechanisms 277
11.1. Project-specific Grievance Mechanism 277
11.2. Collaboration with KGM for Land Acquisition Related Grievances 282
11.3. Collaboration with EPC Contractor for Construction Related Grievances 283
11.4. Appeals Mechanism 284
12. Vulnerable People 285
12.1. Project-affected Households 285
12.2. Project-affected Businesses 291
12.3. Support for Vulnerable People during RAP Implementation 293
12.3.1. Support for Vulnerable Households 294
12.3.2. Support for Project-affected Businesses 297
13. Monitoring 298
13.1. Internal RAP Monitoring 298
13.2. External RAP Monitoring 302
13.2.1. IESC's Periodic E&S Monitoring 302
13.2.2. External Independent Compliance Reviews 302
13.2.3. RAP Completion Audit 304
14. Roles and Responsibilities 306
14.1. Responsibilities under BOT Contract 306
14.2. Contracting Authority – KGM 307
14.3. SPV – RAP Implementation Team 309
14.4. Public-Private Partnership (PPP) Control Chief Engineering Unit 316
14.5. Potential Parties for Collaboration 319
15. Implementation Schedule 320
16. Budget 323
APPENDICES 326
Appendix A – Engineering Structures 326
A.1. List of Overpasses 326
A.2. List of Underpasses 328
A.3. List of Culverts 329
Appendix B – Relevant Legislation and Procedures 335
B.1 – Relevant Articles of the Expropriation Law of Türkiye (No. 2942, 1983) 335
B.2 – Other Laws relevant to Land Use, Acquisition, and/or Registration 341
B.3 – Procedure for Valuation of Lands, Constructible Plots and Structures under KGM's Technical Specifications 343
Appendix C – List of Orphan Parcels on Treasury Land 351
Appendix D – Land Entry and Exit Protocols (Template) 353
Appendix E – Consent Protocol (Template) 355
Appendix F – KGM's Booklet on Procedural Steps in Expropriation Processes (Cover Page and Sample Page for Frequently Asked Questions) 356
Appendix G – Example Cut-off Date Notices posted in Affected Settlements 357
Appendix H – List of Commercial Orchards 360
Appendix I – Vulnerability Matrix for Economically Displaced Households 365

List of Tables

Table 2-1. Summary of Key Project Components (as of May 2025) 15
Table 2-2. Main Road per District 17
Table 2-3. Connection Roads 17
Table 2-4. List of Settlements Affected by Land Acquisition (within Expropriation Corridor) 18
Table 2-5. List of Planned Interchanges 25
Table 2-6. List of Planned Tunnels 25
Table 2-7. List of Planned Viaducts 26
Table 2-8. List of Planned Bridges 27
Table 2-9. O&M Centre 28
Table 2-10. List of Planned MSFs 28
Table 2-11. List of Potential Excavated Material Storage Sites (as of May 2025) 30
Table 2-12 Summary of Planned Temporary Construction Facilities (as of May 2025) 32
Table 2-13 List of Construction Camp Sites (as of May 2025) 34
Table 2-14 List of Planned Plants and Facilities 35
Table 2-15 List of Planned Quarries 37
Table 2-16. Key Project Schedule Milestones 42
Table 2-17. Status of Ongoing Construction Works (as of May 2025) 44
Table 2-18. Status of Inventory of Assets and Valuation Studies along the Route (as of June 2025) 47
Table 2-19. Article 8 Negotiation Meetings held to Date (as of June 2025) 48
Table 2-20. Expropriation Status of Privately-owned Parcels within the Expropriation Corridor (as of June 2025) 49
Table 2-21. Status of Agreement for Privately-owned Parcels (June 2025) 49
Table 2-22. Acquisition Status of State-owned Parcels within the Expropriation Corridor (as of June 2025) 51
Table 2-23. Legal Entities with Parcels within the Motorway Expropriation Corridor (as of June 2025 – no change since May) 52
Table 2-24. Status of Lawsuits filed by KGM to Date (as of June 2025) 54
Table 2-25. Motorway KM Chainages for which 1/1,000 Scale Implementation Zoning Plans are in Place 55
Table 2-26. List of Parcels Subject to Execution ("*Uygulama Gormus*") within the Scope of 1/1,000 scale Zoning Implementation Plan 56
Table 2-27. Summary of the Route Assessments and Modifications done for the Project 59
Table 3-1. Summary of Affected Structures 66
Table 3-2. Summary of Potential Impacts of Land Acquisition 68
Table 3-3. Method of Land Take for Permanent and Temporary Project Facilities (as of May 2025) 71
Table 3-4. Affected Neighbourhoods per Expropriation Area and Number of Affected Parcels 72
Table 3-5. Total Area and Number of Parcels per Ownership 74
Table 3-6. Total Area and Number of Parcels per Land Registry Type 74
Table 3-7. Number of Deceased Persons 75
Table 3-8. Legal Entities with Parcels within the Motorway Expropriation Corridor 77
Table 3-9. Settlements with Affected Forest Parcels 78
Table 3-10. Pasture Parcels within the Motorway Expropriation Corridor 79
Table 3-11. Distribution of Private Parcels by Remaining Area After Expropriation 80
Table 3-12. List of Orphan Private Lands with an Area less than 500 m^2 81
Table 3-13. List of Fragmented Lands* 85
Table 3-14. Number of Trees and Parcels for Commercial Orchards in Open Field 88
Table 3-15. Number of Saplings and Parcels for Commercial Orchards under Cover (in Greenhouses) 89
Table 3-16. Number of Land Users within the RAP Survey Sample 90
Table 3-17. Number of Parcels Containing Affected Structures per Settlement: Affected Houses, Greenhouses and Business Structures 92
Table 3-18. Number of Parcels with Affected Houses and Affected Structures per Settlement 94
Table 3-19. Breakdown of Structures and Number of Households 96
Table 3-20. Number of Parcels with Affected Greenhouses per Settlement 98
Table 3-21. List of Parcels with Affected Business Structures to be Relocated 102
Table 3-22. Businesses that will not be Relocated but may experience Partial Loss of Land and/or Assets 103
Table 3-23. Businesses Identified on Land already Expropriated by KGM for Existing State-roads (D-400 and D-695) 105
Table 3-24. Non-Operational Businesses within the Expropriation Corridor 106
Table 3-25. Summary of the Potential Gender related Implications as identified during RAP Surveys (May 2025) 110

Table 3-26. Other Developments in the Regional and Potential for Cumulative Land Acquisition and Resettlement Impacts 114
Table 3-27. Selected Parcels Owned or Used by Individuals with Multiple Parcels Affected by the Project, within the RAP Survey Sample 115
Table 5-1. Baseline Survey Components 141
Table 5-2. Resettlement-Scoping Field Visit Team 142
Table 5-3. List of Meetings and Consultations held during Resettlement-Scoping Field Visit 144
Table 5-4. RAP Survey Design 146
Table 5-5. Distribution of Completed Questionnaires per Settlements – Campaign 1 147
Table 5-6. Distribution of Completed Questionnaires per Settlements – Campaign 2 148
Table 5-7. Agricultural Structure in Districts Along the Highway Route by Various Parameters 152
Table 5-8. Population of Affected Settlements 155
Table 5-9. Population of the Neighbourhoods 156
Table 5-10. Distribution of Settlements according to their Size 156
Table 5-11. Population Changes in the Neighbourhoods in the Last Five Years 157
Table 5-12. Mean and Median Ages according to Districts 158
Table 5-13. Mean and Median Ages of the Neighbourhoods According to Size of the Settlement 158
Table 5-14. Classification of Neighbourhoods by Proximity to Urban Centres 159
Table 5-15. Main Agricultural Products in Affected Settlements 160
Table 5-16. Greenhouse-based Agricultural Output 160
Table 5-17. Significance of Animal Husbandry as a Livelihoods Source in Affected Settlements 161
Table 5-18. Number of Cattle Per Neighbourhood 162
Table 5-19. Crosstabulation with District 162
Table 5-20. Number of Sheep Per Neighbourhood 162
Table 5-21. Sheep Ownership Across Districts 163
Table 5-22. Significance of Employment in Industry 163
Table 5-23. Significance of Government Employment 164
Table 5-24. Significance of Employment in Trade and Other Local Small Businesses 164
Table 5-25. Significance of Pensions 164
Table 5-26. Significance level of Employment in Tourism 165
Table 5-27. Signifance Level of Fishing as a Livelihoods Source 165
Table 5-28. Pastures and Grazing Areas in Affected Settlements 166
Table 5-29. Unemployment as a Significant Issue in Affected Settlements 167
Table 5-30. Number of Estimated Temporary Houses in Neighbourhoods 168
Table 5-31. Household Size Distribution of the Sample Population 169
Table 3-32. Number of Persons (Individuals) to be Physically Displaced 169
Table 5-32. Gender of Respondents 170
Table 5-33. Education Levels among Respondents 170
Table 5-34. Land Ownership or Tenancy Status of Households using the Affected House 170
Table 5-35. Structure Ownership or Tenancy Status of Households using the Affected House 171
Table 5-36. Acquisition of the Affected Parcel through Inheritance 172
Table 5-37. Residence Status 172
Table 5-38. Ownership of Another House 172
Table 5-39. Primary Sources of Income for Households 173
Table 5-40. Parcels Containing House and used for Agriculture 173
Table 5-41. Presence of Irrigation Infrastructure on Affected Parcel 174
Table 5-42. Sources of Information on Sales in the Neighbourhood 175
Table 5-43. Preferred Method for Purchasing Property 175
Table 5-44. Awareness of the Motorway Project before RAP Surveys 177
Table 5-45. Awareness of the Route Details 177
Table 5-46. Household Size Distribution of the Sample Population 178
Table 5-47. Gender of Respondents 178
Table 5-48. Education Levels among Respondents 178
Table 5-49. Official Farmer Status 179
Table 5-50. Land Ownership or Tenancy Status of Households using the Affected House 179
Table 5-51. Acquisition of the Affected Parcel through Inheritance 179
Table 5-52. Primary Sources of Income for Households 180
Table 5-53. Agricultural Activities on Affected Parcels 180
Table 5-54. Purpose of Agricultural Production 181
Table 5-55. Presence of Irrigation Infrastructure on Affected Parcel 181

Table 5-56. Assistance Need in Finding Alternative Agricultural Land 181
Table 5-57. Presence of Other Parcels Owned or Used outside the Motorway Expropriation Corridor 182
Table 5-58. Number of Parcels Owned or Used by Affected Households inside and outside the Expropriation Corridor 182
Table 5-59. Sources of Information on Land Sales in the Neighbourhood 184
Table 5-60. Preferred Method for Purchasing Land 184
Table 5-61. Awareness of the Motorway Project before RAP Surveys 184
Table 5-62. Awareness of the Route Details 185
Table 6-1. Procedure to be followed by KGM for Lawful Eviction of Expropriated Properties and Measures to be taken by SPV when to Eviction by KGM is Unavoidable 202
Table 7-1. Eligibility Categories under IFC PS5 and Corresponding Provisions under Turkish Expropriation Law 205
Table 7-2. Categories of Eligible People under RAP 206
Table 7-3. Examples of Required Documentation for Eligibility Assessment 210
Table 7-4. Existing Public Benefit and Accelerated Expropriation Decisions 211
Table 7-5. Entitlements Matrix 216
Table 8-1. Package 1: External Agricultural Consultancy Support 244
Table 8-2. Top 10 Crops with the Highest Net Income According to the Income–Expenditure Tables of the District Directorates of Agriculture and Forestry 245
Table 8-3. Package 2: Agricultural Training Programs 246
Table 8-4. Package 3: Distribution of Seedlings, Agricultural Inputs and Materials 247
Table 8-5. Unit Prices for Seedlings for 2025 249
Table 8-6. Package 2: One-year Rental Support for Replacement Land to be rented 250
Table 8-7. Rental Support Calculated for Greenhouses and Open-field Agriculture 251
Table 8-8. Cash Compensation for Crops 251
Table 8-9. Calculated Crop Values in Monoculture Orchards (TL/da) 253
Table 8-10. Priority in Project Employment 254
Table 8-11. Package 1: External Business Consultancy Support 257
Table 8-12. Package 2: Pre-relocation Financial Support Package for Business Owners 259
Table 8-13. Package 3: Pre-relocation Financial Support Package for Business Owners 260
Table 8-14. Package 4: Implementation Support Package 260
Table 8-15. Financial Support Package to Employees 261
Table 9-1. Key Criteria for Selection of Rural and Urban Resettlement Sites 264
Table 10-1. Key Engagement with KGM as part of RAP Preparation 269
Table 10-2. Priority Settlements to be covered during the Disclosure Period 273
Table 10-3. Stakeholder Engagement Plan for RAP Disclosure and Implementation 274
Table 11-1. Channels for Collecting Complaints and Feedback 279
Table 11-2. Key Steps of the Grievance Mechanism for Land-acquisition related Grievances 281
Table 11-3. Management of Grievances Collected by SPV 283
Table 12-1. Relevance of Vulnerability Criteria to the Project for Economically and Physically Displaced Households within RAP Survey Sample 285
Table 12-2. Number of Households with Vulnerable Members by Displacement Category within RAP Survey Sample 286
Table 12-3. Vulnerability Matrix for Physically Displaced Households within the RAP Survey Sample 289
Table 12-4. Number of Potentially Vulnerable Employees in Affected Businesses 292
Table 12-5. Support and Assistance for Affected Households with Vulnerable Members 295
Table 12-6. Special Assistance for Vulnerable Employees of the Affected Businesses 297
Table 13-1. Framework of Internal RAP Monitoring 300
Table 14-1. Land Acquisition related Responsibilities of KGM and the SPV as per the BOT Contract – Article 13 306
Table 14-2. KGM's Roles and Responsibilities relevant to RAP 308
Table 14-3. Key Roles and Responsibilities of the RAP Implementation Team Members 311
Table 14-4. Key Roles and Responsibilities of the Third-party RAP Implementation Partners and Consultants 313
Table 14-5. Potential Parties for Collaboration 319
Table 15-1. General Implementation Schedule for RAP 321
Table 16-1. Indicative Budget for RAP Fund 325

List of Figures

Figure 1-1. Project Structure and Key Stakeholders as defined under the BOT Contract and the Prospective Loan Agreement 14
Figure 1-2. Key Project Milestones Relevant to RAP 14
Figure 2-1. Antalya – Alanya Motorway Route 16
Figure 2-2. Settlement along the Antalya – Alanya Motorway Route – Serik District 19
Figure 2-3. Settlement along the Antalya – Alanya Motorway Route – Manavgat District 20
Figure 2-4. Settlement along the Antalya – Alanya Motorway Route – Alanya District 21
Figure 2-5. Examples for Variation of Expropriation Corridor Width Along the Project Route 22
Figure 2-6. Project Itinerary (as of May 2025) 24
Figure 2-7. Examples of Avoidance through Micro-siting of Expropriation Corridor Boundary 64
Figure 3-1. Summary of Key Data related to Land Acquisition and Project Displacement Impacts 66
Figure 3-2. Parcels registered as Pasture and affected by the Project in Uzunlar neighbourhood 79
Figure 3-3. Examples of Orphan Parcels 82
Figure 3-4. Examples of Fragmented Parcels 84
Figure 3-5. Sample Affected Orchards – Open Field 88
Figure 3-6. Photographs of Sample Affected Houses 95
Figure 3-7. Photographs of Sample Affected Businesses 101
Figure 4-1. Institutional Framework relevant to the RAP – Central Administration 118
Figure 4-2. Summary of the Expropriation Process implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983) 126
Figure 7-1. Examples of Expropriation Corridor Boundary Markers in Affected Settlements 212
Figure 8-1. Summary of Livelihood Restoration, Improvement and Assistance Packages for Affected Lands 241
Figure 8-2. Summary of Livelihood Restoration, Improvement and Assistance Packages for Affected Businesses 255
Figure 14-1. General E&S Organogram and the RAP Implementation Team Structure 310
Figure 14-2. Project-level PPP Control Chief Engineering Unit operating under KGM's 13th Regional Directorate 317

Abbreviations

Abbreviation	Definition
AAO	Antalya-Alanya Motorway
AIIB	Asian Infrastructure Investment Bank
BAP	Biodiversity Action Plan
BATEM	West Mediterranean Agricultural Research Institute Directorate
BOT	Built-Operate-Transfer
CIMER	The Presidency's Communication Centre of Türkiye
CLO	Community Liaison Officer
CDP	Community Development Plan
CPI	Consumer Price Index
CSO	Civil Society Organisation
ÇKS	Farmers Registration System
DSI	State Hydraulic Works
E&S	Environmental and Social
EHS	Environment, Health and Safety
EP	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
ESIA	Environmental and Social Impact Assessment
EUR	Euro
GBVH	Gender-Based Violence and Harassment
GEM	GEM Sustainability Services and Consultancy Inc.
GIS	Geographical Information System
GLAC	Guide to Land Acquisition and Compensation
GPV	Gross Product Value
HH	Household
IESC	Independent E&S Consultant
IFC	International Finance Corporation
IFIs	International Financial Institutions
KGM	Directorate General of Highways
KPIs	Key Performance Indicators
MERNIS	Central Civil Registration System
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTI	The Ministry of Transport and Infrastructure
MSF	Motorway Service Facilities
MSMEs	Micro, small and medium-sized enterprises
NGO	Non-governmental Organisation

Abbreviation	Definition
O&M	Operation & Maintenance
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Lines
PAP	Project Affected Person
PPI	Producer Price Index
PPP	Public Private Partnership
PSs	Performance Standards
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
TEIAS	Turkish Electricity Transmission Company
TKGM	General Directorate of Land Registry and Cadastre
TOKI	Housing Development Administration of Türkiye
TURKSTAT	Turkish Statistical Institute
UYAP	National Judiciary Informatics System

1. Introduction

This Resettlement Action Plan (RAP) has been prepared by GEM Sustainability Services and Consultancy Inc. (GEM or the RAP Consultant) for the **Antalya-Alanya Motorway Project** (the Project) of **Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş.,** which serves as the Special Purpose Vehicle (SPV) for the Project (also referred to as the Project Company, Assigned Company or the Company throughout this Report). The SPV was established by **Limak İnşaat Sanayi ve Ticaret A.Ş**, an affiliated company of **Limak Holding.**

The Project is a public-private partnership (**PPP**), with the granting authority being the **Republic of Türkiye Ministry of Transportation and Infrastructure** (**MoTI**), represented by the **Directorate General of Highways** (**KGM**). It is located within the jurisdiction of the Antalya 13th Regional Directorate of KGM[1].

The Project is implemented under the **Build-Operate-Transfer** (**BOT**) model, in which the SPV acts as the private partner. The BOT **Implementation Contract** (BOT Contract) for the Project was signed between KGM and the SPV on 14 October 2024. The BOT Contract defines a concession period of **15 years**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the BOT Contract, the **construction phase is 36 months**, commencing from the date of signing the finance agreement for the Project between the SPV and the lenders.

The SPV is considering approaching international financial institutions (IFIs) and commercial banks (referred to collectively as potential "lenders"), to finance the Project. Accordingly, the RAP has been developed in accordance with the following standards of these potential lender groups (the "applicable international standards") – **subject to confirmation prior to financing of the Project**:

- International Finance Corporation (IFC) Performance Standards (PSs) (2012),
- Equator Principles (EP) 4 (2020),
- Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (2019), and
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the "Common Approaches" adopted in 2012 and revised in 2016)

The RAP has been developed based on a comprehensive review of expropriation data compiled by the engineering firm appointed by the SPV, with the approval of KGM, in accordance with the Expropriation Law and KGM Technical Specifications, and the outcomes of the RAP fields surveys conducted in May 2025, as outlined in Chapter 4.

The RAP is a living document and will be updated, as necessary throughout the implementation period.

In parallel with this RAP study, a national consultancy firm is undertaking an Environmental and Social Impact Assessment (ESIA) process for the Project.

The RAP will be disclosed by the SPV and the lenders in line with their disclosure policies, in order to provide stakeholders with detailed information on Project activities, impact assessments, planned mitigation measures, and monitoring activities, as well as to collect public feedback on the Project and its disclosure documents.

In October 2024, the Lenders retained an Independent Environmental and Social Consultant (IESC) to carry out Environmental and Social Due Diligence (ESDD) for the Project and to review the ESIA disclosure package – including this RAP – in accordance with the applicable international standards, prior to public disclosure.

The Project structure and key stakeholders, as defined under the BOT Contract and the prospective Loan Agreement, are summarised in Figure 1-1.

The key Project milestones relevant to RAP are presented in Figure 1-2

[1] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/13Bolge/Iletisim.aspx

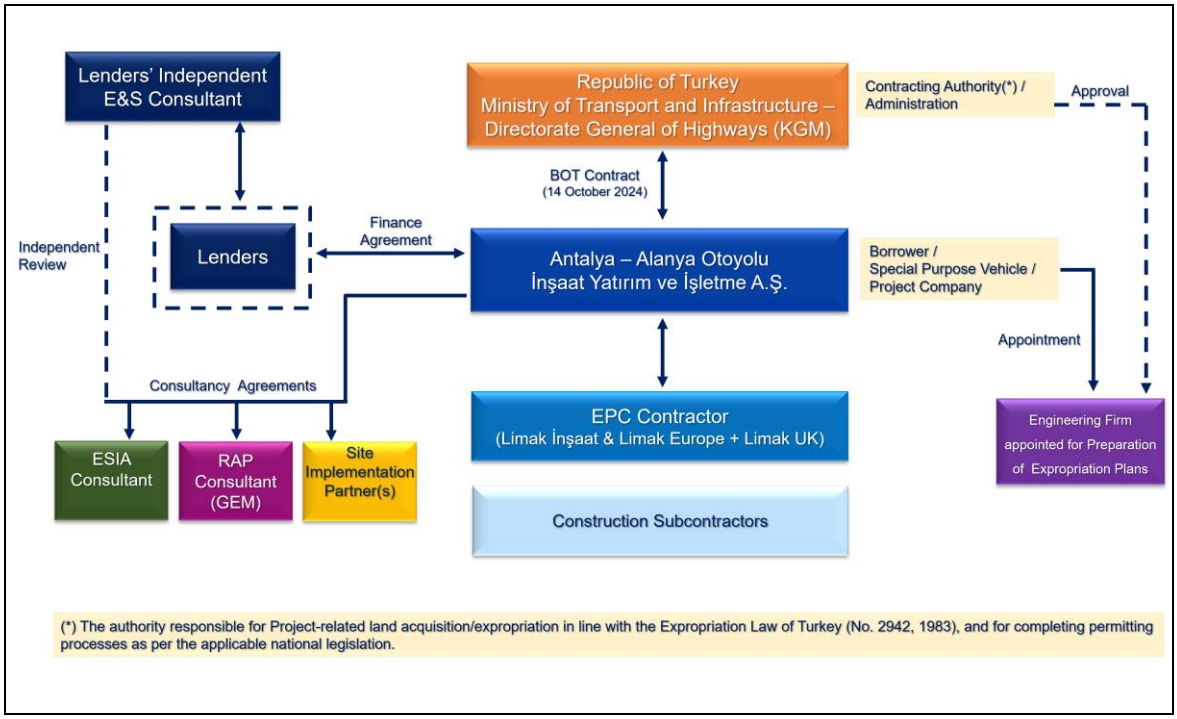


Figure 1-1. Project Structure and Key Stakeholders as defined under the BOT Contract and the Prospective Loan Agreement

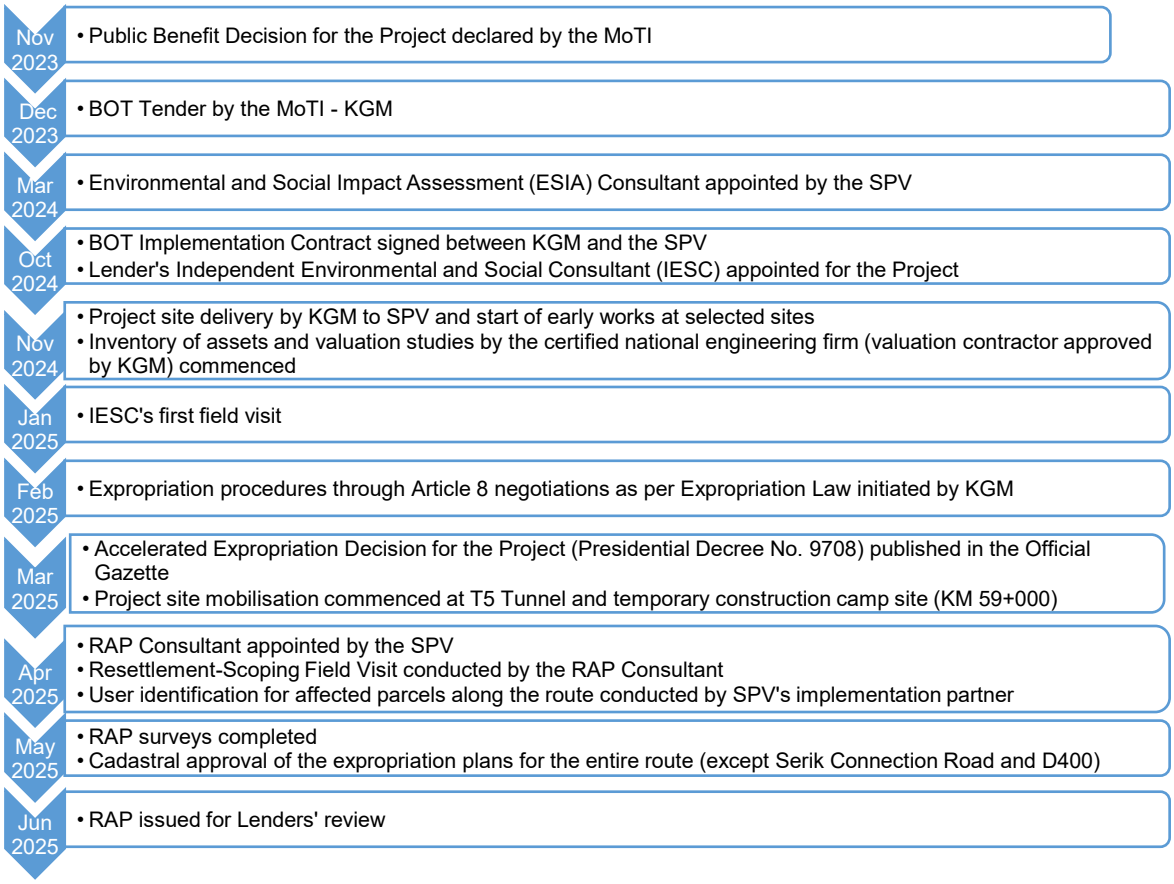


Figure 1-2. Key Project Milestones Relevant to RAP

2. Project Description

The **Antalya–Alanya Motorway** Project was originally designed as part of the broader **Afyon–Antalya–Alanya Motorway** and was included in the tender held in 2010. The route initially began at KM 0+000, south of the Ekşili area northwest of Antalya, and extended to KM 155+620, located east of Alanya. However, due to technical, financial, environmental, and social considerations, the relevant authorities decided to proceed with a BOT tender for the Antalya–Alanya section, which was concluded in 2013.

The Antalya-Alanya Motorway, which is the Project subject to the BOT Contract and this RAP, begins east of the Deniztepe settlement (Serik district) at **KM 52+000** and ends at **KM 136+000**. From there, it continues via the Alanya Western Connection Road and links to the D400 highway at **KM 141+786.884**, located east of Konaklı, a district west of Alanya.

Along the motorway route, **interchanges** have been designed at **seven** locations. Additionally, to serve nearby settlements and ensure connections to the state road located to the south, connection roads have been planned The current Project route is shown in Figure 2-1.

Across the Motorway corridor, changes have been made to the approved preliminary route at certain locations, as outlined in Section 2.10.

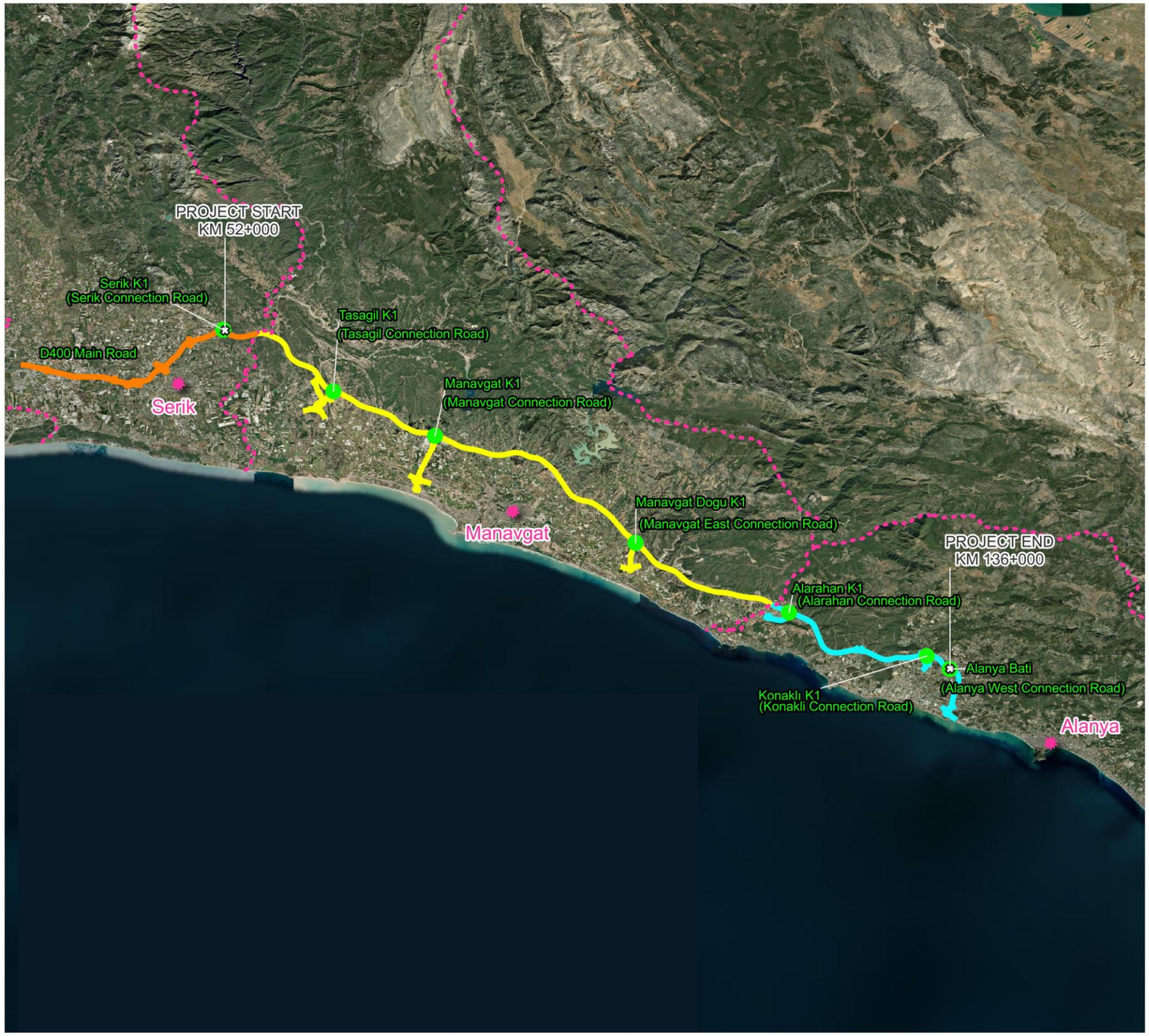
Table 2-1 provides a summary of Project's key components.

Table 2-1. Summary of Key Project Components (as of May 2025)

Component	Information according to Current Design
Length of the Motorway	117.8 km (84 km Main Road + 33.8 km Connection Roads)
Cross Sections	Main Motorway: 2x3 lanes Connection Roads: 2x2 lanes
Interchanges	7 (Serik, Taşağıl, Manavgat, Manavgat East, Alarahan, Konaklı, Alanya West)
Tunnels	5
Viaducts	16
Bridges	22
Overpasses	56
Underpasses	43
Culverts	308 (2x2, 3x3, 4x4, 5x5, 7x5, 10x4, 12x5, 15x6)
Operation and Maintenance Centre	1 – KM 64+500
Motorway Service Facilities (MSFs)	Four MSFs at the following chainage: 1) KM 80+500 (80 m^2) 2) KM 90+800 (80 m^2) 3) KM 113+500 (180 m^2) 4) KM 135+700 (60 m^2)
Toll Booths	Seven toll plazas at the following chainage: 1) Serik Connection Road KM 2+400: Serik Interchange Toll Plaza 2) Tasagil Connection Road KM 0+900: Tasagil Interchange Toll Plaza 3) Manavgat Connection Road KM 2+350: Manavgat Interchange Toll Plaza 4) Manavgat East Connection Road KM 2+400: Manavgat East Interchange Toll Plaza 5) Alarahan Connection Road KM 1+800: Alarahan Interchange Toll Plaza 6) Konakli Connection Road KM 0+850: Konakli Interchange Toll Plaza 7) Alanya West Connection Road KM 138+550: Alanya West Interchange Toll Plaza If requested by KGM in due course, a mainline toll booth ("*alin gisesi*") on the main alignment at KM:52+000 may also be included.
Lighting	To be provided at the following: 1) Tunnels 2) Intersections 3) Toll booths 4) MSFs

Source: SPV, May 2025.

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Legend

- Antalya – Alanya Motorway Route/ Serik Section
  Antalya - Alanya Otoyolu / Serik Bölümü
- Antalya – Alanya Motorway Route/
  Manavgat Section
  Antalya - Alanya Otoyolu /
  Manavgat Bölümü
- Antalya – Alanya Motorway Route/ Alanya Section
  Antalya - Alanya Otoyolu / Alanya Bölümü
- District Boundary/ İlçe Sınırı
- Interchanges / Kavşaklar
- District Center / İlçe Merkezi

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Antalya - Alanya Motorway / *Antalya-Alanya Otoyolu*
Map Title / *Harita Başlığı*	:	Project Route and the Districts affected by the Project-related Land Acquisition / *Proje Güzergahı ve Projenin Arazi Edinminden Etkilenen İlçeler*
Prepared for / *Proje Şirketi*	:	Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş./
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

N

0 10 20 km

Basemap Source: Google Earth

Figure 2-1. Antalya – Alanya Motorway Route

2.1. Project Location and Route

The Project is located in **Antalya** province and traverses the boundaries of **3 districts** and **55[2] neighbourhoods**. The neighbourhoods along the Project route are shown in Figure 2-2 (Serik district), Figure 2-3 (Manavgat district), and Figure 2-4 (Alanya district). The lengths of the main road sections and connection roads are provided in Table 2-2 and Table 2-3.

The settlements affected by Project-related land acquisition (hereinafter referred to as "**affected settlements**") along the Motorway route are listed in Table 2-4.

Table 2-2. Main Road per District

District	Start KM	End KM	Approximate Length
Serik	52+000	55+838	4 km
Manavgat	55+838	117+582	62 km
Alanya	117+582	136+000	18 km
Total			**84 km**

Table 2-3. Connection Roads

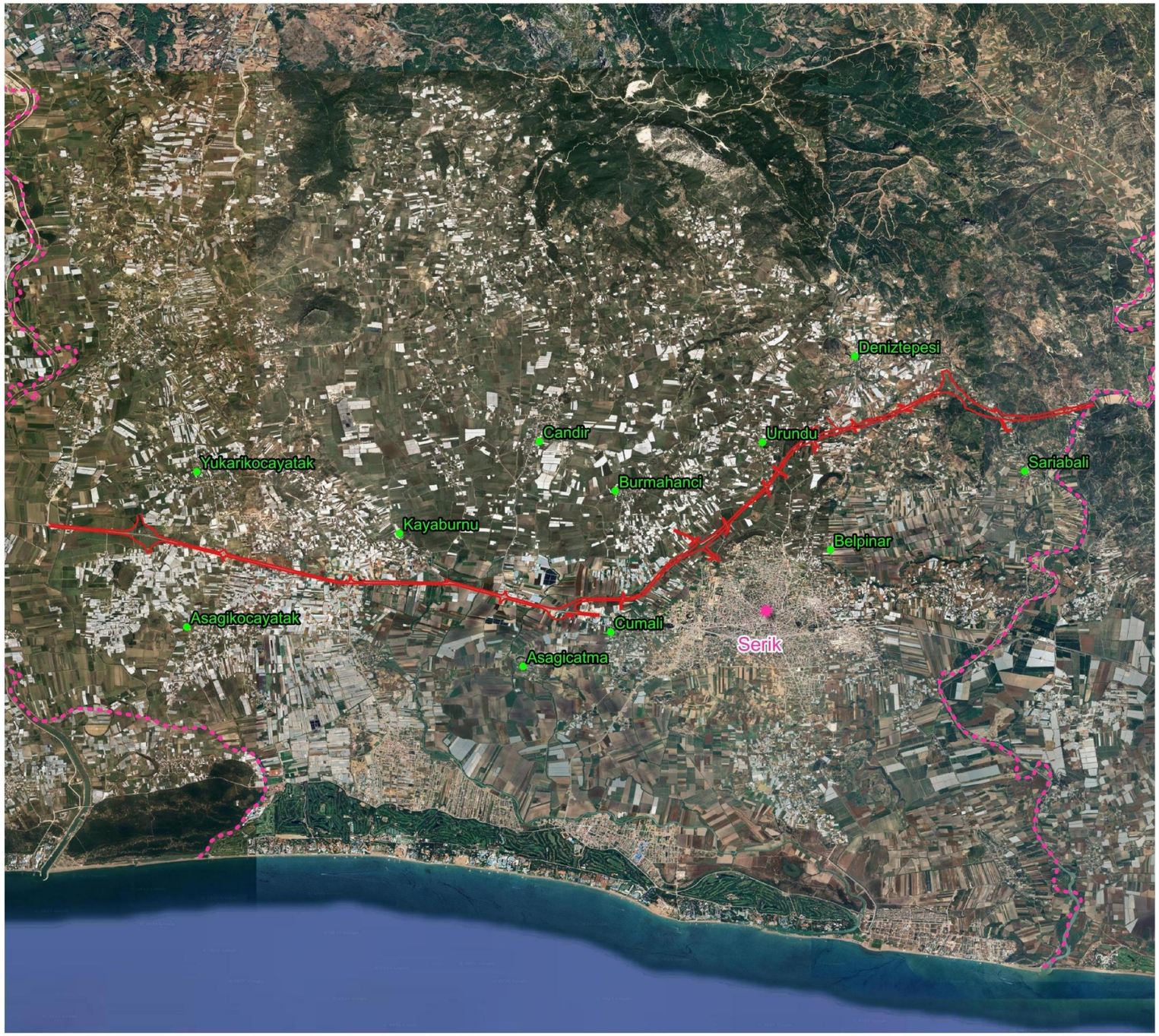
District	Connection Road	Start KM	Length
Serik	Serik Connection Road	52+324	10,746 km
Manavgat	Tasagil Connection Road	66+288	2,620 m
	Manavgat Connection Road	77+030	6,809 m
	Manavgat East Connection Road	100+737	3,460 m
Alanya	Alarahan Connection Road	117+581	2,835 m
	Konakli Connection Road	133+436	1,600 m
	Alanya West Connection Road	136+000	5,705 m
Total			**33,775 m**

[2] This is the number of neighbourhoods included in the expropriation plans.

Table 2-4. List of Settlements Affected by Land Acquisition (within Expropriation Corridor)

District/ Neighbourhood	Main Road	Connection Roads							Number of Settlements
		Serik-D400	Taşağıl	Manavgat	Manavgat East	Alarahan	Konaklı	Alanya West	
Serik district									
Deniztepesi	X	X							
Sariabali	X	X							
Yukarikocayatak		X							
Asagikocayatak		X							
Kayaburnu		X							
Candir		X							11
Asagicatma		X							
Cumali		X							
Burmahanci		X							
Urundu		X							
Belpinari		X							
Manavgat district									
Cakis	X								
Tasagil	X		X						
Gundogdu	X								
Hocalar	X		X						
Yavrudogan	X								
Colakli	X								
Seki	X								
Kalemler	X			X					
Evren				X					
Ilica				X					
Yenikoy	X								
Siseler	X								
Evrenleryahsi	X								
Dolbazlar	X								
Yukariisiklar	X								
Dikmen	X								
Bucakseyhler	X								33
Ulukapi	X								
Asagisiklar	X								
Demirciler	X								
Karaoz	X								
Aksaz	X								
Haciali	X								
Cevizler	X								
Sulek	X								
Haciisali	X								
Haciobası	X				X				
Uzunlar	X								
Kadilar	X								
Orensehir	X								
Yalcidibi	X								
Odaonu	X								
Karakaya	X								
Alanya district									
Alara	X					X			
Cakallar	X								
Incekum	X								
Avsallar	X								
Akdam	X								
Turkler	X								11
Payallar	X								
Emisbeleni	X						X		
Toslak	X							X	
Telatiye								X	
Elikesik								X	
Total									**55**

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Legend

- Antalya – Alanya Motorway Expropriation Corridor - Serik District / Antalya -Alanya Otoyolu Kamulaştırma Sınırı - Serik İlçesi
- District Boundary/ İlçe Sınırı
- District Center/İlçe Merkezi
- Neighbourhood Centers/ Mahalle Merkezleri

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Antalya - Alanya Motorway / *Antalya-Alanya Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Antalya – Alanya Motorway Route – Serik District / *Antalya – Alanya Otoyol Güzergâhı Üzerindeki Yerleşimler – Serik İlçesi*
Prepared for / *Proje Şirketi*	:	Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş./
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

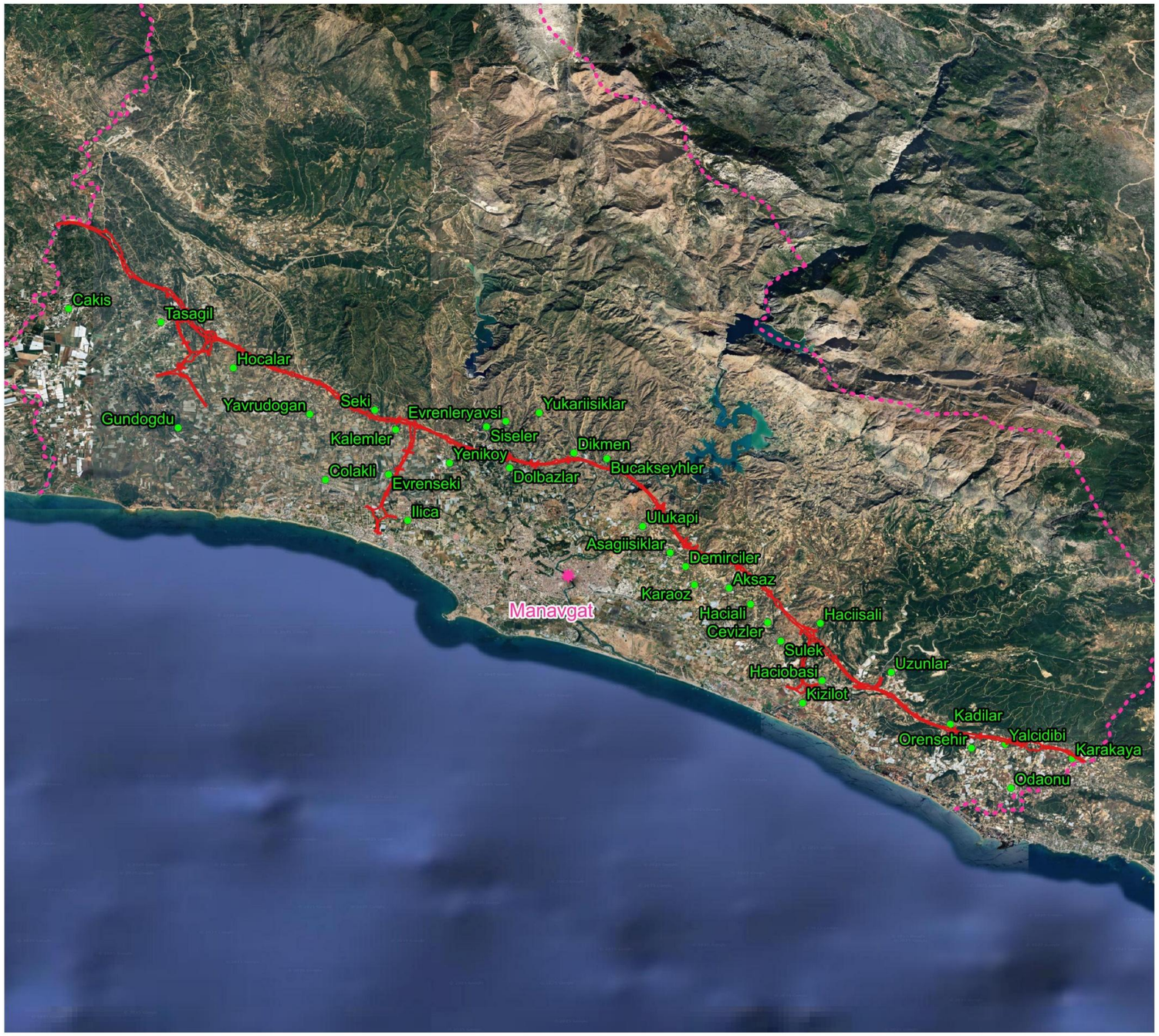
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Basemap Source: Google Earth

Figure 2-2. Settlement along the Antalya – Alanya Motorway Route – Serik District

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Legend

- Antalya – Alanya Motorway Expropriation Corridor - Manavgat District / Antalya -Alanya Otoyolu Kamulaştırma Sınırı - Manavgat İlçesi
- District Boundary/ İlçe Sınırı
- District Center/İlçe Merkezi
- Neighbourhood Centers/ Mahalle Merkezleri

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Antalya - Alanya Motorway / *Antalya-Alanya Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Antalya – Alanya Motorway Route – Manavgat District / *Antalya – Alanya Otoyol Güzergâhı Üzerindeki Yerleşimler – Manavgat İlçesi*
Prepared for / *Proje Şirketi*	:	Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş./
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

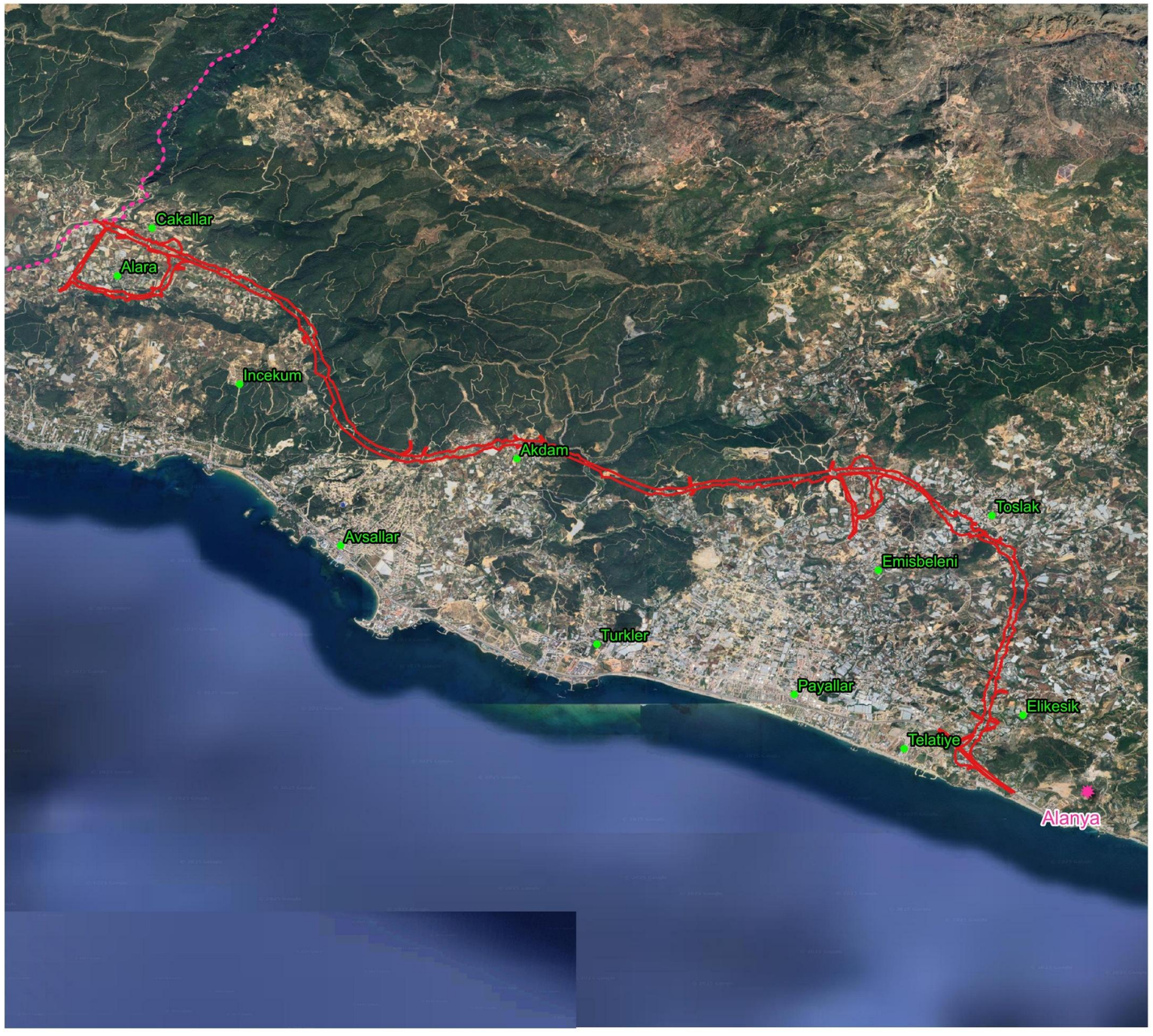
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Basemap Source: Google Earth

Figure 2-3. Settlement along the Antalya – Alanya Motorway Route – Manavgat District

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Legend

- Antalya – Alanya Motorway Expropriation Corridor - Alanya District / Antalya -Alanya Otoyolu Kamulaştırma Sınırı - Alanya İlçesi
- District Boundary/ İlçe Sınırı
- District Center/İlçe Merkezi
- Neighbourhood Centers/ Mahalle Merkezleri

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Antalya - Alanya Motorway / *Antalya-Alanya Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Antalya – Alanya Motorway Route – Alanya District / *Antalya – Alanya Otoyol Güzergâhı Üzerindeki Yerleşimler – Alanya İlçesi*
Prepared for / *Proje Şirketi*	:	Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş./
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

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0 1 2 km

Basemap Source: Google Earth

Figure 2-4. Settlement along the Antalya – Alanya Motorway Route – Alanya District

2.2. 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. Permanent components including **engineering structures, interchanges,** and **toll booths** are also located entirely within the corridor.

The **width of the expropriatio**n corridor varies along the route and is influenced by several factors:

- Topographical conditions requiring specific excavation or embankment profiles,
- The size and layout of engineering structures,
- Design specifications and dimensions of interchanges and service areas, which generally necessitate broader acquisition areas compared to standard Motorway sections,
- Presence of sensitive receptors and structures, which may prompt efforts to avoid or minimize impacts – such as narrowing the corridor to prevent the expropriation of existing residential buildings or commercial facilities, where feasible.

A summary of the **minimum and maximum** of the expropriation corridor along the full alignment of the Motorway is presented below.

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

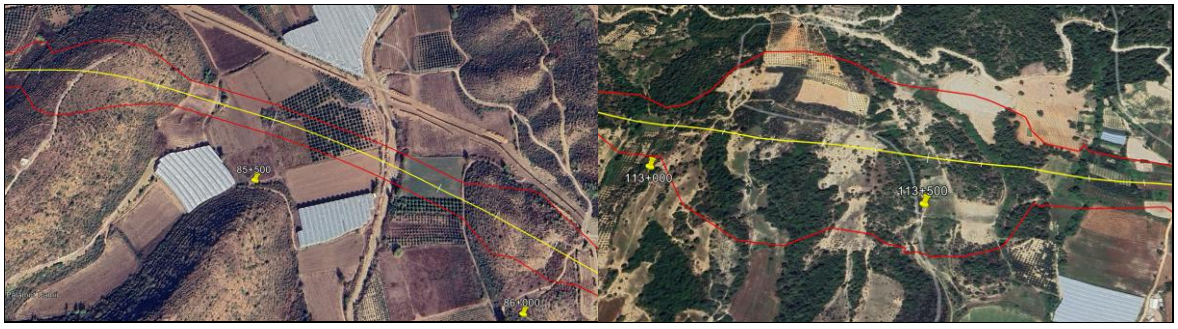


Figure 2-5. Examples for Variation of Expropriation Corridor Width Along the Project Route

Following the completion of construction works, the **entire expropriation corridor** along the Motorway alignment **will be fenced** in accordance with KGM Technical Specifications. During the operational phase of the Project, access to and use of this fenced corridor by local communities and unauthorised individuals will be strictly prohibited, both for operational integrity and to ensure health and safety.

It is important to note that **no separate health protection strip will be established** for the **Motorway** beyond the expropriation corridor. As a result, there will be no restrictions on access to lands adjacent to, but outside of, the fenced corridor.

The establishment of health protection strips **around temporary construction facilities**, such as quarries and plants, is addressed separately in 2.3.9.

2.3. Project Components

The ESIA Report (May 2025) includes a detailed description of the Project and its components, as well as the Motorway design criteria.

In summary, the main Project components include the following:

- Interchanges
- Tunnels
- Viaducts
- Bridges
- Overpasses, Underpasses and Culverts
- Operation and Maintenance (O&M) Centre
- Motorway Service Facilities (MSFs)

In addition to these main components, there will be:

- Excavated materials storage sites (may be permanent or temporary facilities)
- Temporary construction facilities (including construction camp sites, concrete plants, mechanical and asphalt plants, crushers, and quarries)

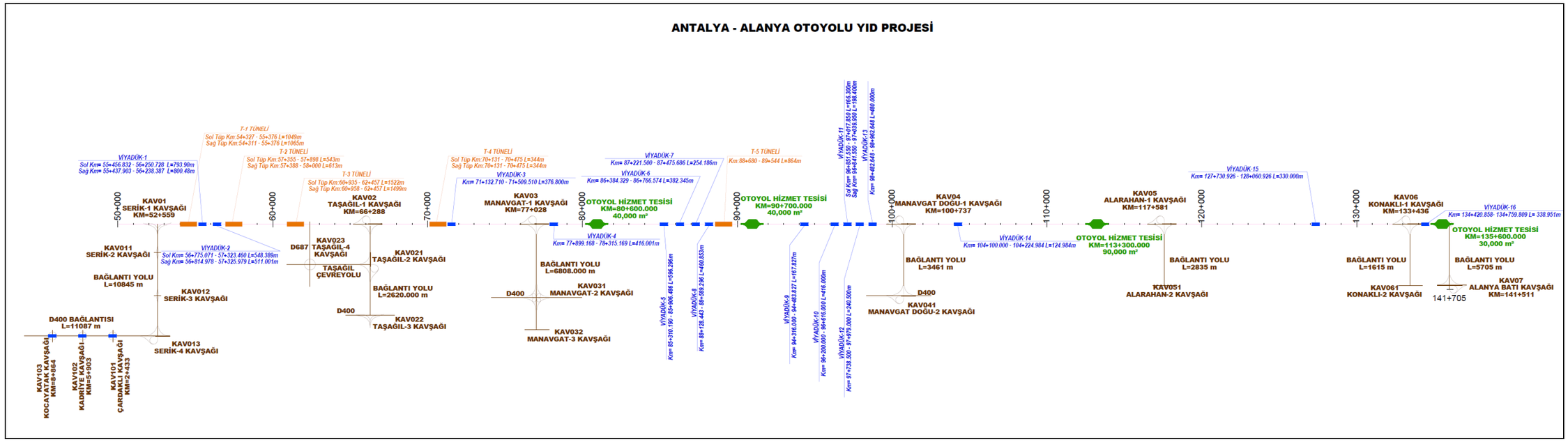


Figure 2-6. Project Itinerary (as of May 2025)

2.3.1. Interchanges

The list of planned interchanges is provided in Table 2-5. Interchange carriageways will consist of 2 lanes, with each lane having a width of 3.75 meters. The design speed on interchange arms will vary depending on the curve radius, ranging from 50 km/h to 80 km/h.

Interchange carriageways will consist of 2 lanes, with each lane having a width of 3.75 meters. The design speed on interchange arms will vary depending on the curve radius, ranging from 50 km/h to 80 km/h.

Table 2-5. List of Planned Interchanges

No.	Interchange Name	Location	Motorway KM
Serik district			
1	**Serik K1**	**Main Road**	**52+559**
2	Serik K2	Serik Connection Road	3+634
3	Serik K2 MDK-1	Serik Connection Road	0+000
4	Serik K2 MDK-2	Serik Connection Road	0+363
5	Serik K3	Serik Connection Road	7+574
6	Serik K3 MDK-1	Serik Connection Road	0+000
7	Serik K3 MDK-2	Serik Connection Road	0+590
8	Serik K4	Serik Connection Road	11+35
D-400 State Road			
9	Çardaklı	D400 Main Road	2+432
10	Kadriye	D400 Main Road	5+903
11	Kocayatak	D400 Main Road	8+863
Manavgat district			
12	**Taşağıl K1**	**Main Road**	**66+288**
13	Taşağıl K2	Taşağıl Connection Road	1+823
14	Taşağıl K3	Taşağıl Connection Road	2+490
15	Taşağıl K4	Taşağıl Connection Road	2+563
16	**Manavgat K1**	**Main Road**	**77+028**
17	Manavgat K2	Manavgat Connection Road	5+772
18	Manavgat K3	Manavgat Connection Road	6+808
19	**Manavgat Doğu K1**	**Main Road**	**100+735**
20	Manavgat Doğu K2	Manavgat East Connection Road	3+271
Alanya district			
21	**Alarahan K1**	**Main Road**	**117+581**
22	Alarahan K2	Alarahan Connection Road	2+835
23	**Konaklı K1**	**Main Road**	**133+436**
24	Konaklı K2	Konaklı Connection Road	1+600
25	**Alanya Batı**	**Alanya West Connection Road**	**136+000**

2.3.2. Tunnels

The list of tunnels planned under the Project is provided in Table 2-6. All tunnels are located on the main road.

Table 2-6. List of Planned Tunnels

No	Tunnel Name	District	Settlement		KM Start	KM End	Total Length (m)	Total Width (m)
1	T1	Serik	Sariabali	Left	54+327.000	55+376.000	1,049	24
				Right	54+311.000	55+376.000	1,065	24
2	T2	Manavgat	Cakis	Left	57+366.000	57+898.000	532	24
				Right	57+388.000	57+985.000	597	24
3	T3	Manavgat	Tasagil	Left	60+923.000	62+477.000	1,554	24
				Right	60+950.000	62+477.000	1,527	24
4	T4	Manavgat	Gündoğdu/Yavrudoğan	Left	70+131.000	70+475.000	344	24
				Right	70+131.000	70+475.000	344	24
5	T5	Manavgat	Ulukapi	Left	88+676.000	89+544.000	865	24
				Right	88+671.000	89+544.000	873	24

2.3.3. Viaducts

The list of viaducts planned under the Project is provided Table 2-7. All viaducts are located on the main road. The area beneath the viaducts will be fully expropriated; however, no fencing will be installed that restricts passage between the viaduct piers.

Table 2-7. List of Planned Viaducts

No	Viaduct Name		District	Settlement	KM Start	KM End	Total Length (m)	Total Width (m)	Total Area (m^2)
1	V-1	Left side	Serik	Sarıabalı	55+456	56+246	789.38	17.5	13,814.15
		Right side	Manavgat	Çakış	55+437	56+237	799.27	17.5	13,987.23
2	V-2	Left side	Manavgat	Çakış	56+775	57+323	548.39	17.5	9,596.83
		Right side		Sağrin	56+814	57+325	511.00	17.5	8,942.50
3	V-3		Manavgat	Yavrudoğan	71+132	71+509	376.80	35.0	13,188.00
4	V-4		Manavgat	Kalemler/Yeniköy	77+899	78+315	416.00	35.0	14,560.00
5	V-5		Manavgat	Dikmen/Bucakşeyhler	85+310	85+906	596.30	35.0	20,870.50
6	V-6		Manavgat	Bucakşeyhler	86+384	86+766	382.24	35.0	13,378.40
7	V-7		Manavgat	Bucakşeyhler	87+221	87+465	243.61	35.0	8,526.35
8	V-8		Manavgat	Ulukapı	88+128	88+589	460.85	35.0	16,129.75
9	V-9		Manavgat	Karaöz	94+316	94+483	167.00	35.0	5,845.00
10	V-10		Manavgat	Hacıali	96+200	96+616	416.00	35.0	14,560.00
11	V-11	Manavgat	Haciali	Haciali	96+851	97+017	166.30	17.5	2,910.25
		Right side			96+841	97+039	198.40	17.5	3,472.00
12	V-12		Manavgat	Cevizler/Hacıali	97+738	97+979	240.50	35.0	8,417.50
13	V-13		Manavgat	Cevizler	98+482	98+962	480.00	35.0	16,800.00
14	V-14		Manavgat	Hacıobası/Uzunlar	104+100	104+224	124.98	35.0	4,374.30
15	V-15		Alanya	Akdam/Türkler	127+730	128+060	330.00	35.0	11.550,00
16	V-16		Alanya	Emişbeleni	134+420	134+759	338.95	35.0	11.863,25

2.3.4. Bridges

The list of bridges planned under the Project is provided in Table 2-8.

Table 2-8. List of Planned Bridges

No	Bridge Name	Bridge Type	District	Settlement	Road Part	KM Start	KM End	Total Length (m)	Total Width (m)
1	K1	Hydraulic	Manavgat	Seki	Motorway	80+203	80+295	91.84	42.50
2	K2	Hydraulic	Manavgat	Demirciler/Karaöz	Motorway	93+505	93+630	124.94	35.00
3	K3	Bridge	Manavgat	Hacıisali	Motorway	100+717	100+757	40.00	42.50
4	K4	Hydraulic	Manavgat	Hacıobası/Uzunlar	Motorway	104+976	105+354	378.04	35.00
5	K5	Hydraulic	Manavgat	Karakaya/Çakallar	Motorway	115+851	116+063	212.00	35.00
6	K6	Bridge	Alanya	Karakaya/Çakallar	Motorway	117+563	117+598	35.00	42.50
7	K7	Hydraulic	Alanya	İncekum/Avsallar	Motorway	121+734	121+901	166.85	35.00
8	K8	Bridge	Alanya	Emişbeleni	Motorway	133+418	133+453	35.00	42.50
9	K9 Brige	Bridge	Alanya	Telatiye	Alanya West Connection Road /D400	141+491	141+537	45.61	42.50
10	K10-KAV011	Interchange Bridge (Serik-2)	Serik	Deniztepesi	Serik Connection Road	0+182	0+220	38.00	27.50
11	K11-KAV012	Interchange Bridge (Serik-3)	Serik	Deniztepesi	Serik Connection	0+393	0+431	37.85	27.50
12	K12	Hydraulic	Serik	Cumalı	Serik Connection	8+968	9+000	32.00	40.50
13	K13-KAV013	Interchange Bridge (Serik-4)	Serik	Cumalı	Serik Connection Road /D400	11+328	11+384	55.99	30.00
14	K14-KAV021	Interchange Bridge (Tasagil-2)	Manavgat	Taşağıl	Taşağıl Connection Road/D400	1+828	1+861	33.00	40.50
15	K15-KAV031	Interchange Bridge (Manavgat-2)	Manavgat	Kalemler	Manavgat Connection Road/D400	5+750	5+794	43.47	27.50
16	K16-KAV041	Interchange Bridge (Manavgat Dogu-2)	Manavgat	Hacıobası	Manavgat Doğu Connection Road/D400	3+242	3+302	60.00	26.50
17	K17	Hydraulic	Alanya	Emişbeleni	Konaklı Connection	1+088	1+246	158.00	26.50
18	K18	Hydraulic	Alanya	Emişbeleni	Konaklı K2 Connection	0+555	0+625	70.00	32.50
19	K19	Hydraulic	Serik	Aşağıçatma	D400 Main	1+596	1+631	35.00	42.50
20	K20-KAV101	Interchange Bridge (Cardakli)	Serik	Kayaburnu	D400 Main	2+362	2+502	140.00	42.50
21	K21	Hydraulic	Serik	Kayaburnu	D400 Main	3+831	3+886	55.00	42.50
22	K22-KAV103	Interchange Bridge (Kocayatak)	Serik	Yukarıkocayatak	D400 Main	8+793	8+933	140.00	42.50

2.3.5. Overpasses, Underpasses and Culverts

To facilitate the uninterrupted passage of agricultural roads, wildlife, and various watercourses beneath the Motorway, a range of underpasses, overpasses, and culverts with different diameters and structural specifications are planned. The spacing of these structures has been determined based on existing resources, infrastructure, local land use patterns and specific access requirements.

During Project implementation, the SPV, subject to KGM's approval, may provide additional structures within the expropriation corridor, if needed – particularly in response to requests from local communities, public authorities, or other stakeholders – to ensure no land severance or restricted access results from the Project.

A detailed list of all planned overpasses, underpasses, and culverts, including their locations and dimensions, is provided in Appendix A.

2.3.6. Operation and Maintenance Centre

There will be one operation and maintenance (O&M) centre on the Motorway as given in Table 2-9.

The O&M Centre is planned to be established **at the location designated as the main construction camp site.** Accordingly, the land acquisition for the O&M Centre will be completed as part of the land take process for the main construction camp site.

Table 2-9. O&M Centre

Road Part	KM	District	Settlement	Parcel No.	Total Area
Main Road	64+500	Manavgat	Tasagil	Same with the Main Construction Camp Site: - 653/1 (forest) - 663/1 (forest) - 515/413 (agricultural land with olive trees) - 515/535 (formerly part of 515/414 registered as agricultural land, currently registered as road) - 515/536 (formerly part of 515/414 registered as agricultural land, currently registered as road) - 515/415 (currently registered as road) - 515/537 (formerly part of 515/44 registered as agricultural land with olive trees, currently registered as road)	162,084.53 m^2

2.3.7. Motorway Service Facilities (MSFs)

The list of MSFs planned under the Project is provided in Table 2-10. The MSFs will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

At each MSF location, service areas will be situated on opposite sides of the Motorway's carriageways.

Table 2-10. List of Planned MSFs

No	MSF Type	KM	District	Settlement	Total Area (m^2)
1	TBD	80+500	Manavgat	Siseler	2 x 45,000.00
2	TBD	90+500	Manavgat	Asagiisiklar	2 x 40,000.00
3	TBD	113+500	Manavgat	Yalcidibi	2 x 90,000.00
4	TBD	135+500	Alanya	Toslak	2 x 30,000.00

2.3.8. Excavated Materials Storage Sites

In addition to the motorway components, the Project will include excavated material storage sites designated for the placement and storage of surplus materials from excavation works that are unsuitable for reuse. The specific sites to be utilized, as well as the duration of material storage – whether temporary or permanent – have yet to be determined. These decisions will be made by the SPV as part of the ongoing permitting procedures and detailed design process.

The list of **potential** excavated material storage sites planned under the Project is provided in Table 2-11.

Table 2-11. List of Potential Excavated Material Storage Sites (as of May 2025)

No	Storage Area No	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Currently Entered by the Project (as of May 2025)	Parcel No.	Land Registry Type of the Parcel[3]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Ownership (Private or Public – shareholding status should be indicated)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit[4] Status (as declared by the Company) (as of May 2025)	EIA Decision Status (as declared by the Company)
1	Storage-2	Serik	Sarıabalı	52+544	Outside	New	No	165/1	Forest	2,110,351.10	79,875.26	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	**Application will be done to obtain relevant EIA Decision** once the site is confirmed for use. .
2	Storage-3	Manavgat	Çakış	59+580	Outside	New	No	151/1	Forest	8,317,914.70	232,297.82	State	Same as above	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
3	Storage-6	Manavgat	Taşağıl	61+500	Outside	New	No	644/1	Forest	16,574,402.10	235,324.36	State	Same as above	Forestry permit application has been done on 02.12.2024 **The permitting process is ongoing.**	Same as above.
4	Storage-7	Manavgat	Çardak	64+160	Outside	New	No	101/1	Forest	43,603,402.04	255,527.75	State	Same as above	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
5	Storage-11	Manavgat	Seki	74+360	Outside	New	No	839/1	Forest	9,838,416.01	38,972.2	State	Same as above	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
								274/80	Agricultural land	1,217	1,217	Ownership information is currently not available – to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done after the identification of ownership**	
								834/1	Agricultural land	4,401.04	395.36				
								835/1	Agricultural land	7,489.44	2,547.79				
								Total area			43,132.35				
6	Storage-14	Manavgat	Kalemler	76+240	Outside (but adjacent to the Exp. Corridor)	New	No	208/1	Forest	8,842,337.24	47,092.3	Private and state	Forest: Allocation through forestry permit Private: Purchase or expropriation	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
								121/310	Agricultural land	248.36	248.36	Ownership to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done after the identification of ownership**	
								165/1	Agricultural land	17,405.49	774.86				
								Total area			48,115.52				
7	Storage-15	Manavgat	Yeniköy	78+790	Outside	New	No	160/1	Forest	6,184,932.18	219,150.32	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
								131/1	Forest	11,004.23	6,907.27				
								Total area			226,057.59				
8	Storage-16	Manavgat	Bucakşeyhler	86+340	Outside	New	No	241/1	Forest	11,686,047.97	366,015.51	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
								213/9	Agricultural land	12,465.60	1.231,11	Ownership information is currently not available – to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done** after the identification of ownership	
								213/8	Agricultural land	33,369.90	367.75				
								103/1	Agricultural land	1,278.68	1,278.68				
								104/1	Agricultural land	720.95	720.95				
								226/1	Agricultural land	1,550.19	1,550.19				
								Total area			369,933.08				
9	Storage-17	Manavgat	Bucakşeyhler	87+800	Outside	New	No	241/1	Forest	11,686,047.97	129,789.6	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.

[3] According to the database of the Directorate of Land Registry and Cadastre, *https://parselsorgu.tkgm.gov.tr/*

[4] The duration of each permit will be specified within the respective permit documents.

No	Storage Area No	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Currently Entered by the Project (as of May 2025)	Parcel No.	Land Registry Type of the Parcel[3]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Ownership (Private or Public – shareholding status should be indicated)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit[4] Status (as declared by the Company) (as of May 2025)	EIA Decision Status (as declared by the Company)
								193/9	Agricultural land	753.33	232.57	Ownership information is currently not available – to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done after the identification of ownership**	
								193/1	Agricultural land	24,841.13	1090.55				
								Total area			131,112.72				
10	Storage-18	Manavgat	Karaöz, Aksaz	95+410	Outside	New	No	174/1	Forest	1,717,657.09	89,397.18	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
								103/3	Agricultural land	26,587.05	1,547.49	Ownership information is currently not available – to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done after the identification of ownership**	
								103/4	Agricultural land	10,031.15	506.78				
								Total area			91,451.45				
11	Storage-19	Manavgat	Aksaz	95+410	Outside	New	No	Non-registered parcel	Forest	-	81,824.93	Non-registered	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
12	Storage-20	Manavgat	Cevizler	98+290	Outside	New	No	189/1	Forest	997,102.66	157,550.73	Private and state *Private owner to be identified by the KGM/SPV*	Allocation through forestry permit For private-owner, Land take method to be determined depending on the ownership	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.** Land use permit applications **will be done** after the identification of ownership	Same as above.
								208/40	Agricultural land	2,429.19	2,429.19	Ownership information is currently not available – to be identified by the KGM/SPV	Land take method to be determined depending on the ownership	Permit for Non-agricultural Use of Agricultural Land application **will be done after the identification of ownership**	
								208/7	Agricultural land	20,528.77	7,515.55				
								149/1	Agricultural land	8,697.46	1,914.05				
								Total area			169,409.52				
13	Storage-22	Manavgat	Kadılar	107+850	Outside	New	No	150/1	Forest	9,673,381.66	105,589.16	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
14	Storage-23	Manavgat	Kadılar	110+820	Outside	New	No	150/1	Forest	9,673,381.66	1,129,502.05	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
			Yalçıdibi					104/1	Forest	6,232,294.13					
								Total area		15,905,675.79	1,129,502.05				
16	Storage-24	Manavgat	Yalçıdibi	113+050	Outside	New	No	104/1	Forest	6,232,294.13	219,670.14	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
17	Storage-26	Alanya	Avsallar	123+000	Outside	New	No	Non-registered parcel	Forest	-	569,413.44	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
18	Storage-27	Alanya	Avsallar	124+250	Outside	New	No	Non-registered parcel	Forest	-	388,413.83	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
19	Storage-28	Alanya	Akdam	127+000	Outside	New	No	Non-registered parcel	Forest	-	367,905.23	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
20	Storage-29	Alanya	Türkler	130+400	Outside	New	No	Non-registered parcel	Forest	-	370,127.94	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.
21	Storage-30	Alanya	Payallar	132+720	Outside	New	No	936/1	Forest	1,654,529.07	357,294.01	State	Allocation through forestry permit	Forestry permit application has been done on 02.12.2024. **The permitting process is ongoing.**	Same as above.

2.3.9. Temporary Construction Facilities

The temporary construction facilities planned for use under the Project include the following:

- **Construction camp sites** of the SPV and EPC Contractor (including subcontractors), including associated camp facilities such as dormitories, administrative offices, social facilities, and other supporting infrastructure;
- **Quarries**, designated for the extraction of raw materials required for construction activities (including pre-screened fill material) – these may include licensed operational sites or new sites to be established specifically for the Project;
- **Mechanical, Asphalt, and Concrete Plants**, for on-site production of construction materials; and
- **Beam Production Plants**, established to support the fabrication of structural components for bridges and viaducts.

Table 2-12 provides a summary of the number and locations of the temporary construction facilities planned under the Project. Details regarding land use and permitting status for each facility are presented in the following sub-sections.

The final list of facilities to be used under the scope of the Project will be confirmed by the SPV and EPC upon completion of the permitting processes.

Table 2-12 Summary of Planned Temporary Construction Facilities (as of May 2025)

Facility	Number of Facilities/Sites	Location
Construction Camp Sites	4	1) Tasagil Temporary Construction Camp Site (KM 59+500) 2) Tasagil Main Construction Camp Site (KM 64+500) 3) Manavgat Construction Camp Site (KM 87+500) 4) Alanya Construction Camp Site (KM 124+300)
Concrete Batching Plants	7	All outside the Motorway's expropriation corridor/
Asphalt Plants	3	
Crushing/Mechanical Plants	3	
Quarries	11	
Beam Production Plants	To be determined	To be determined

In addition to the construction camp and facility sites planned by the SPV and EPC Contractor, there may be additional camp and facility sites proposed by subcontractors engaged in the Project. These potential sites will be identified and confirmed by the SPV and EPC Contractor in due course. Should such sites be required, the SPV will monitor and ensure that the EPC Contractor secures all necessary permits and licenses, and that the sites are operated in full compliance with national environmental legislation and applicable Lender standards, prior to the commencement of operations.

Land Acquisition for Temporary Facilities

Temporary facilities, such as construction camps, plants, and storage areas, **may or may not be located within the expropriation corridor**, depending on land availability and operational considerations.

When located outside the expropriation corridor, the land acquisition processes for temporary facilities are carried out as follows:

- **Privately-owned parcels**: The SPV or EPC Contractor acquires the necessary land through rental agreements, mutual protocols, or similar arrangements with landowners or shareholders. Upon completion of the temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed conditions.
- **State-owned parcels**: Lands owned by the Treasury or non-registered lands are allocated to the Project upon application by KGM, without requiring payment. These lands are similarly rehabilitated and handed back to the State at the end of the temporary use period, in line with agreed terms.
- **Parcels owned by legal entities**: Such parcels may be temporarily allocated to the Project upon KGM's application, with or without payment, depending on the specific agreement between KGM and the legal entity. As with other cases, the land is rehabilitated and returned to the legal entity after use.

Health Protection Strip for **Temporary Facilities**

In accordance with the Regulation on Workplace Opening and Operating Permits, **each temporary facility must have a health protection strip**, which is determined based on factors such as operational scope, capacity, and physical area. Under Article 16 of the Regulation:

- Health protection strips must fall within the legal property boundaries of the facility.
- For facilities where such a strip is mandatory, access restrictions (e.g., on residential development) apply only within the property boundaries.
- No access restrictions apply to areas beyond the property boundaries.

2.3.9.1. Construction Camp Sites

The construction camp sites planned to be used in the Project are listed in Table 2-13.

Table 2-13 List of Construction Camp Sites (as of May 2025)

No	Facility Name	District	Settlement	Main Road / Connection Road	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Currently Entered by the Project (as of May 2025)	Parcel No.	Land Registry Type of the Parcel[5]	Area of the Parcel (m^2)	Area to be Used within the Parcel (m^2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Permit Duration (if applicable)	EIA Decision Status[6] (as declared by the Company)
1	Temporary Construction Camp	Manavgat	Tasagil	Manavgat Main Road	59+500	Outside (but adjacent to the Exp. Corridor)	New	Yes	644/1	Forest	16,574.402.10	**66,449.00**	Throughout the construction period (3 years)	State	Allocation through forestry permit	**The forestry permit was obtained on 4 March 2025.**	Forestry permit valid until 14 October 2027.	**In place –** Out of Scope of EIA Regulation Decision
2	Main Construction Camp Site	Manavgat	Tasagil	Manavgat Main Road	64+500	Outside (but adjacent to the Exp. Corridor)	New	No	In total 7 parcel including forest, agricultural land, road as provided below:									
									653/1	Forest	48,699.38	35,971.90	Throughout the construction period and will continue to serve as O&M Centre during the operation phase	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permitting process is ongoing.**	To be specified in the permitting document	**In place –** Out of Scope of EIA Regulation Decision (dated 17.01.2025)
									663/1	Forest	17,474.22	17,474.22		State				
									515/413	Agricultural land with olive trees	13,533.90	6,087.34		Litigious[7]	Allocation of state parcel (The application will be done when the court case has been finalized.)	Application to obtain permit for Non-agricultural Use of Agricultural Land **will be done when the court case has been finalized.**		
									515/535 *(former Parcel No. 515/414)*	Road *(formerly agricultural land)*	4,701.64	4,701.64		Private	Accelerated expropriation **Art 27 court cases have been filled, process ongoing** (see Section 2.8.4)	Application to obtain permit for Non-agricultural Use of Agricultural Land **have been done:** -515/414 (28 January 2025) – **The permit was obtained on 17 March 2025** -515/515 and 515/537 (12 December 2024) **The permitting process is ongoing.**		
									515/536 *(former Parcel No. 515/414)*	Road *(formerly agricultural land)*	1,629.88	1,629.88		Private				
									515/415	Road *(formerly agricultural land)*	95,479.34	95,479.34		Private				
									515/537 *(former Parcel No. 515/44)*	Road *(formerly agricultural land with olive trees)*	740.21	740.21		Private				
									Total area			**162,084.53**						
3	Manavgat Construction Camp Site	Manavgat	Bucak seyhler	Manavgat Main Road	87+500	Outside (but adjacent to the Exp. Corridor)	New	Yes – Mobilisation suspended (see Section 2.3.9.1)	241/1	Forest	11.686.047,97	**86.544,20**	Throughout the construction period (3 years)	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permit was obtained on 13 June 2025.**	To be specified in the permitting document	**In place –** Out of Scope of EIA Regulation Decision
4	Alanya Construction Camp Site	Alanya	Incekum	Alanya Main Road	124+300	Outside (but adjacent to the Exp. Corridor)	New	No	Non-registered	Forest	-	**95,427.41**	Throughout the construction period (3 years)	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permitting process is ongoing.**	To be specified in the permitting document	**In place –** Out of Scope of EIA Regulation Decision

[5] According to the database of the Directorate of Land Registry and Cadastre, *https://parselsorgu.tkgm.gov.tr/*

[6] If the decision date is not indicated, it is because the document does not specify it.

[7] The parcel ownership is litigious and the lawsuit for resolution of ownership disputes between the state (forestry) and private-owner(s) is ongoing.

2.3.9.2. Plants and Facilities

The concrete plant, asphalt plant and mechanical plant site alternatives identified by the SPV and EPC Contractor are listed in Table 2-14.

Table 2-14 List of Planned Plants and Facilities

No	Facility Name	District	Settlement	Main Road / Connection Road	Motorway KM	Location (Outside or Inside the Exp Corridor)	Is it a New Facility or an Existing or Former Facility	Currently Entered by the Project (as of May 2025)	Parcel No.	Land Registry Type of the Parcel[8]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
1	Concrete Plant-1	Serik	Sariabali	Serik Main Road	55+450	Outside	New site	No	167/1	Forest	5,935,871.04	13,946.40	Throughout the construction	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permitting process is ongoing.**	To be specified in the permitting document	Will be obtained after the land use permit and the decision for the use of site is taken by the Project and before land entry.
2	Concrete Plant-2 Mechanical Plant-1 Asphalt Plant-1	Manavgat	Tasagil	Manavgat Main Road	59+500 *(facilities located in Temporary Cons. Camp Site)*	Outside	New site	Yes	644/1	Forest	16,574.402.10	66,449.00 *(total area for the temporary cons camp site)*	Throughout the construction	State	**No additional land take** – Land take is conducted as part of Temporary Construction Camp Site; allocation through forestry permit	**In place – The forestry permit was obtained on 4 March 2025.**	Forestry permit valid until 14.10.2027.	EIA Application was done in May 2025. **The process is ongoing.**
3	Concrete Plant-3	Manavgat	Siseler	Manavgat Main Road	80+400	Outside	New site	No	138/74 *(former Parcel No. 138/26)*	Road *(formerly agricultural land)*	4,741.63	4,741.63	Throughout the construction	Private	Negotiation meeting by KGM was held on 6 February 2025 – **Partially expropriated (agreement on 4 of 25 shares)**	Permit for Non-agricultural Use of Agricultural Land was done on 28 January 2025. **The permitting process is ongoing.**	To be specified in the permitting document	Will be obtained after the land use permit and the decision for the use of site is taken by the Project and before land entry.
									138/76 *(former Parcel No. 138/27)*	Road *(formerly agricultural land)*	3,791.54	3,791.54		Private	Negotiation meeting by KGM was held on 6 February 2025 – **Partially acquired (agreement on 1 of 2 shares)**			
									138/78 *(former Parcel No. 138/55)*	Road *(formerly agricultural land)*	5,295.64	5,295.64		Private	Negotiation meeting by KGM was held on 6 February 2025 – **To be acquired (agreement on 0 of 11 shares)**			
									138/80 *(former Parcel No. 138/56)*	Road *(formerly agricultural land)*	9,508.05	9,508.05		Private	Negotiation meeting by KGM was held on 6 February 2025 – **Fully acquired (agreement on 3 of 3 shares)**			
									Total area			**23,336.86**						
4	Concrete Plant-4 Mechanical Plant-2 Asphalt Plant-2	Manavgat	Bucak Seyhler	Manavgat Main Road	87+700	Outside	New site	No	241/1	Forest	11.686.047,97	42,371.44	Throughout the construction	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permitting process is ongoing.**	To be specified in the permitting document	Same as above

[8] According to the database of the Directorate of Land Registry and Cadastre, *https://parselsorgu.tkgm.gov.tr/*

No	Facility Name	District	Settlement	Main Road / Connection Road	Motorway KM	Location (Outside or Inside the Exp Corridor)	Is it a New Facility or an Existing or Former Facility	Currently Entered by the Project (as of May 2025)	Parcel No.	Land Registry Type of the Parcel[8]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
5	Concrete Plant-4a	Manavgat	Ulukapi	Manavgat Main Road	89+700	Outside	New site	No	280/1	Forest	1.346.651,72	11,665.86	Throughout the construction	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permit was obtained on 13 June 2025.**	To be specified in the permitting document	Same as above
6	Concrete Plant-5	Manavgat	Sulek	Manavgat Main Road	99+200	Outside	New site	No	201/1	Forest	1,584,345.04	11,977.58	Throughout the construction	State	Allocation through forestry permit	Forestry permit application has been done on 23 August 2024. **The permitting process is ongoing.**	To be specified in the permitting document	Same as above
7	Çenger Stream Crusher	Manavgat	Uzunlar	Manavgat Main Road	105+000	Outside	New site	No	*Exact location (parcel) not decided yet*	-	-	-	Throughout the construction	Ownership to be determined after the exact location of the site is selected.	Land take method to be determined after the exact location of the site is selected.	Land use permit application **will be done** after the exact location of the site is selected.	To be specified in the permitting document	Same as above
8	Concrete Plant-6 Mechanical Plant-3 Asphalt Plant-3	Alanya	Incekum	Alanya Main Road	124+300	Outside	New site	No	Non-registered parcel	Forest	-	95,427.41	Throughout the construction	State	Allocation through forestry permit	Forestry permit application has been done on 23.08.2024. **The permitting process is ongoing.**	To be specified in the permitting document	Same as above

Note: Planning for the Beam Production Plants is ongoing as of May 2025. The relevant information will be incorporated into the table once the details are finalized (SPV, May 2025).

2.3.9.3. Quarries

The quarry alternatives identified by the SPV and EPC Contractor for supplying materials required for construction works (such as pre-screening fill material, asphalt and concrete production) are listed in Table 2-15.

If new quarries are to be developed solely to meet the needs of the Project, the SPV will ensure that the EPC Contractor obtains all necessary permits and licenses and fully complies with the relevant national environmental legislation as well as applicable Lender standards prior to commencing operations at the quarry sites.

Table 2-15 List of Planned Quarries

No	Name of the Quarry	District	Settlement	Motorway KM	Location (Outside or Inside the Exp Corridor)	New Facility or Existing Facility	Currently Entered by the Project (as of May 2025)	Description of Use Prior to Project (if there is any)	Parcel No.	Land Registry Type of the Parcel[9]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Raw Material Production Permit Status and EIA Decision (as declared by the Company) (as of May 2025)
1	Sarıabalı Quarry	Serik	Sarıabalı	53+800	Outside	New	No	-	165/1	Forest	2,110,351.10	247,301.00	Throughout the construction period	State	Allocation through forestry permit	Land use permit applications will be done after the decision for the use of site is taken and before land entry.	**Raw Material Production Permit obtained on 23 January 2025.** **EIA application was done to obtain relevant EIA Decision** on 19 February 2025. **The process is ongoing.**
2	Çakış Quarry	Manavgat	Çakış	56+500	Outside	New	No	-	151/1	Forest	8,317,914.70	249,936.00	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Raw Material Production Permit obtained on 11 March 2025.** **EIA application was done to obtain relevant EIA Decision** on 19 March 2025. **The process is ongoing.**
3	Kuruçay Quarry	Manavgat	Sağrin	58+500	Outside	Existing facility	No	Quarry	551/1	Forest	9,192,362.00	30,553.50	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Application will be done to obtain relevant EIA Decision** once the site is confirmed for use.
			Taşağıl						644/1	Forest	16,574,402.10	212,439.96		State	Allocation through forestry permit		
									Total area			242,993.46					
4	Dikmen Quarry	Manavgat	Dikmen	84+500	Outside	New	No	Quarry	740/1	Forest	636,930.25	199,147.67	Throughout the construction period	State	Allocation through forestry permit	Same as above.	Same as above.
									644/1	Agricultural	9,100.75	6,040.30		Private	To be purchased or expropriated		
									644/2	Agricultural	7,237.04	1,294.72		Private			
									645/5	Agricultural	140,311.27	30,264.40		State	Allocation of state parcels		
									645/12	Agricultural	2,946.94	2,537.22		State			
									645/13	Agricultural	12,307.91	4,701.86		State			
									Total area			243,986.17					
5	Bademliyar Quarry	Akseki	Güçlüköy	104+750	Outside	Existing facility	No	Quarry	303/1	Forest	43,684,671.05	180,378.00	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Raw Material Production Permit obtained on 23 December 2024.** **EIA application was done to obtain relevant EIA Decision** on 30 May 2025. **The process is ongoing.**

[9] According to the database of the Directorate of Land Registry and Cadastre, *https://parselsorgu.tkgm.gov.tr/*

No	Name of the Quarry	District	Settlement	Motorway KM	Location (Outside or Inside the Exp Corridor)	New Facility or Existing Facility	Currently Entered by the Project (as of May 2025)	Description of Use Prior to Project (if there is any)	Parcel No.	Land Registry Type of the Parcel[9]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Raw Material Production Permit Status and EIA Decision (as declared by the Company) (as of May 2025)
6	Çenger Stream Quarry	Manavgat	Uzunlar	105+000	Outside	New	No	Quarry	*Exact location (parcel) not decided yet*	-	-	-	Throughout the construction period	Ownership to be determined after the exact location of the site is selected.	Land take method to be determined after the exact location of the site is selected.	Same as above	Same as above
7	Uzunlar Quarry	Manavgat	Uzunlar	106+000	Outside	Partially intersects with another existing quarry	No	Quarry	272/1	Forest	3,955,110.89	245,930.00	Throughout the construction period	State	Allocation through forestry permit	Same as above	Same as above
8	Karakaya Quarry	Manavgat	Karakaya	114+200	Outside	New	No	Quarry	139/1	Forest	13,675,540.06	249,123.00	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Raw Material Production Permit obtained** on 14 January 2025. **EIA application was done to obtain relevant EIA Decision** on 27 January 2025. **The process is ongoing.**
9	Saburlar Quarry	Alanya	Saburlar	117+000	Outside	New	No	Quarry	102/1	Agricultural	16,655.15	15,006.89	Throughout the construction period	State	Allocation of state parcels	Same as above	**Raw Material Production Permit obtained** on 28 November 2024. **EIA application was done to obtain relevant EIA Decision** on 31 December 2024. **The process is ongoing.**
									102/2	Agricultural	1,426.22	1,426.22		State	Allocation of state parcels		
									102/3	Agricultural	9,548.85	9,548.85		Private	To be purchased or expropriated		
									102/4	Garden	11,557.16	10,851.10		Private	To be purchased or expropriated		
									102/5	Agricultural	1,917.22	1,280.02		State	Allocation of state parcels		
									102/6	Agricultural	18,055.13	3,769.89		Private	To be purchased or expropriated		
									102/7	Agricultural	4,895.91	4,895.91		Private	To be purchased or expropriated		
									103/23	Winter pasture *(kışlak)*	60,684.07	17,592.20		State	Allocation of state parcels		
									103/24	Garden	3,794.50	3,794.50		Private	To be purchased or expropriated		
									103/25	Agricultural	5,213.11	5,213.11		Private	To be purchased or expropriated		
									103/49	Agricultural	28,599.00	16,515.45		Private	To be purchased or expropriated		
									103/50	Agricultural	765.17	765.17		Private	To be purchased or expropriated		
									104/132	Agricultural	8,331.94	8331.94		Private	To be purchased or expropriated		
									104/133	Agricultural	22,647.92	10,922.52		Private	To be purchased or expropriated		
									167/1	Forest	24,328,868.01	138,261.86		State	Allocation through forestry permit		
									Total area			248,175.63					

No	Name of the Quarry	District	Settlement	Motorway KM	Location (Outside or Inside the Exp Corridor)	New Facility or Existing Facility	Currently Entered by the Project (as of May 2025)	Description of Use Prior to Project (if there is any)	Parcel No.	Land Registry Type of the Parcel[9]	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company) (as of May 2025)	Raw Material Production Permit Status and EIA Decision (as declared by the Company) (as of May 2025)
10	Karamanlar Quarry	Alanya	Incekum	119+500	Outside	New	No	-	167/1	Forest	24,328,868.01	213,091.92	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Raw Material Production Permit obtained** on 24 January 2025. **EIA application was done to obtain relevant EIA Decision** on 19 February 2025. **The process is ongoing.**
									130/2	Agricultural	24,797.11	24,797.11		Private	To be purchased or expropriated		
									130/3	Agricultural	3,169.16	3,169.16		Private			
									130/4	Agricultural	4,356.58	4,356.58		Private			
									130/5	Agricultural	1,559.29	1,559.29		Private			
									130/6	Agricultural	2,796.95	2,796.95		Private			
									130/7	Agricultural	1,266.45	1,266.45		Private			
									130/8	Agricultural	6,439.47	6,439.47		Private			
									130/9	Agricultural	5,521.98	5,521.98		Private			
									130/10	Agricultural	2,008.11	2,008.11		Private			
									130/11	Agricultural	1,767.29	1,767.29		Private			
									130/12	Agricultural	9,026.71	9,026.71		Private			
									130/13	Pylon location	278.53	278.53		Legal entity			
									131/10	Agricultural	20,592.74	340.07		Private			
									131/12	Agricultural	1,386.19	756.68		Private			
									131/13	Agricultural	1,130.75	338.47		Private			
									131/14	Agricultural	23,527.23	2,868.79		Private			
									131/16	Agricultural	25,513.77	17,666.96		Private			
									131/17	Agricultural	9,731.32	8,217.54		Private			
									Total area			306,268.06					
11	Soğukpınar Quarry	Alanya	Burçaklar	134+000	Outside	New	No	-	192/1	Forest	2,954,719.70	215,776.50	Throughout the construction period	State	Allocation through forestry permit	Same as above	**Raw Material Production Permit obtained** on 27 May 2025. **Application will be done to obtain relevant EIA Decision** once the site is confirmed for use.

2.3.10. Associated Facilities

The IFC PS1 (2012) defines "*associated facilities"* as follows:

> "*…facilities that 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.*
>
> *Footnote: Associated facilities may include railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, and logistics terminals."*

The Project ESIA (April 2025) does not indicate any associated facilities.

In the event that associated facilities are identified during or following the completion of the final design, the SPV will ensure that any displacement risks or impacts resulting from such facilities are managed and mitigated in accordance with Turkish legislation, the objectives of IFC Performance Standard 5 (PS5), and the principles outlined in this RAP.

Please refer to Section 3.4 for the procedure to be followed in case of potential additional expropriation works.

2.5. Project Schedule

The **BOT Implementation Contract** (BOT Contract) for the Project was signed between KGM and the SPV on **14 October 2024**.

The BOT Contract defines a concession period of **15 years**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the BOT Contract, the **construction phase is 36 months**, commencing from the date of signing the finance agreement for the Project between the SPV and the lenders.

The Detailed Work Schedule for the Project has been prepared by the SPV and approved by KGM on 20 March 2025. It should be noted that schedule revisions may occur due to site access and permitting constraints and financial factors – subject to approval by KGM. **Table 2-16 below** provides a summary of key milestones for expropriation, construction, E&S studies and Project finance according to current KGM approved schedule.

According to the BOT Contract – Article 13[10], "*Expropriation plans and expropriation program prepared by the Assigned Company in accordance with the Technical and Administrative Specifications of the Administration shall be **delivered to the Administration 9 (nine) months prior to the date of use of the relevant land** according to the approved Work Program*".

Based on the KGM approved Detailed Work Schedule, the SPV and the EPC Contractor have prepared quarterly work schedules for the earthworks planned for the second and third quarters of 2025. In accordance with the quarterly construction schedules, the SPV ensures the timely preparation and submission of expropriation plans to KGM for land parcels needed to enable site access, as stipulated by the BOT Contract.

Quarterly work schedules include the following information and enable the Project to track the status of permits for the parcels to be entered.

- Type of Construction Work
- Location (Motorway KM, District, Neighbourhood, Lot and Parcel Number)
- Planned Start Date of Work
- Ownership Status of Relevant Parcel
- Acquisition and permit status of the relevant parcels

The **implementation of the key principles of the RAP has commenced**, with key activities including the following:

- Coordination with KGM to prioritise Article 8 procedures over Article 27,
- Identification of users of affected lands,
- Preparation of land entry protocols and work permits that incorporate the land acquisition status of the areas to be accessed, to serve as a checkpoint prior to entry, and
- Information of affected people on the expropriation procedures, inheritance procedures, etc.

The SPV, in collaboration with KGM, will continue **RAP implementation for a duration of 36 months**, starting from the signing of the financing agreement. This period will encompass the entire construction phase and may extend into the initial months of the commissioning and operational phase, if needed.

Throughout the implementation period, internal monitoring by the SPV will be conducted on an ongoing basis to ensure regulatory compliance and the timely delivery of entitlements and support measures to affected individuals and communities in line with the RAP. Approximately two years after the completion of all RAP measures, including post-implementation monitoring, **a RAP Completion Audit will be carried out**. This audit will be undertaken by independent RAP consultant(s), who will be approved by the Lenders and commissioned by the SPV. The audit will verify the successful fulfilment of all RAP commitments, with particular emphasis on the restoration of livelihoods for affected persons and households.

[10] Article 13: Expropriation, Zoning, Allocation, Establishment of Easement Right, Issuance of Usage Permit, Easement Right and Usage Permit Prices and Revenue Share

Table 2-16. Key Project Schedule Milestones

No	Key Milestones / Tasks	Date
0	**BOT Contract and Design**	
0.1	Execution of the BOT Contract and Site Delivery	14 October 2024
0.2	Preliminary Motorway Design Approval by KGM	28 November 2024
0.3	Final Motorway Design Approval by KGM	31 March 2028[11] (target)
1	**Expropriation**	
1.1	Start of inventory of assets and valuation study commenced by appointed Engineering Firm (OGY)	November 2024
1.2	Start of expropriation procedures by KGM (through Article 8 notifications and negotiation meetings)	February 2025
1.3	Completion of valuation	July-August 2025 (target)
1.4	Completion of expropriation procedures (including title deed transfer)	To be confirmed
1.4.1	KM 52+000 – 80+000	November 2025 (target)
1.4.2	KM 80+000 – 114+750	November 2025 (target)
1.4.3	KM 114+750 – 141+705	April 2026 (target)
1.5	Start of assistance to be provided by the SPV to heirs to obtain their inheritance certificates from the closest notary and complete succession process with support from SPV	Q2 2025 (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 and Lenders (60 days) (including Disclosure Phase stakeholder engagement)	Q3 2025 (target)
2.4	Update the ESIA Package by SPV based on Stakeholder Feedback received during 60 days Disclosure Period	Q3 2025 (target)
2.5	Public Consultation and Disclosure Report prepared and submitted to the Lenders by the SPV	Q3 2025 (target)
2.6	Finance Agreement Signing	Must be before 9 October 2025
3	**Construction Works (36 months after Signing)**	
3.1	Site Mobilisation and Start of Construction	March 2025
3.2	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
3.2.1	KM 52+000 – 80+000	November 2027 (target)
3.2.2	KM 80+000 – 114+750	January 2028 (target)
3.2.3	KM 114+750 – 141+705	November 2027 (target)
3.3	Tunnels	July 2027
3.4	Viaducts	January 2028
3.5	Superstructure Works	February 2028
3.6	Displacement of Existing Infrastructure Overlapping with the Project	October 2027
3.7	Secondary Works (Landscaping, Lighting, Tunnel Electromechanics, Signage, Barriers, Fencing), Intelligent Transportation Systems	March 2028
3.8	O&M Centre and Motorway Service Facilities (MSFs)	March 2028
4.	**Motorway Commissioning**	Within 36 months from the date of signing the finance agreement
5.	**RAP Implementation and Monitoring**	Until the RAP Completion Audit – conducted following the completion of the agreed post-implementation RAP monitoring period – confirms that the livelihoods of affected people have been restored, relevant livelihood restoration and monitoring activities will continue as per the RAP commitments.

[11] In BOT motorway projects in Türkiye, approval of final design is a progressive process, as the preparation of implementation projects is delegated to the Assigned Company. For the Project, the horizontal and vertical alignment approval processes for the 1/5000-scale route have been completed, including connection roads/interchanges and service roads. This approval has determined the alignment of the Motorway. Following the approval of 1/5,000 scale route, geological investigations (e.g. boreholes, trial pits, laboratory testing, etc.) are carried out. Based on these studies, detailed implementation projects are progressively approved – covering aspects such as alignment revisions (e.g. slope angles, elevations) and engineering structures (e.g. tunnels, viaducts, bridges, overpasses, underpasses, culverts) – before construction begins. Ultimately, the 1/1000-scale plan and profile is finalized. During this process, multiple revisions are likely to occur on the 1/5,000-scale route and this remains a dynamic process that may continue for up to two years. In parallel, projects related to other components – such as traffic safety, landscaping, intelligent transportation systems, tunnel electromechanics, and lighting – are be submitted for approval. Therefore, approval of final designs will progressively take place throughout the construction phase.

2.6. Current Construction Status

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 and E&S preparatory works – were initiated in November 2024 at the Temporary Construction Camp Site area (encompassing the sites for Mechanical Plant-1, Asphalt Plant-1 and Concrete Plant-2 located at KM 59+500) and **at the T5 tunnel portal site.**

In line with the construction schedule agreed with KGM, site mobilisation for Project construction began in **March 2025**, financed through the Company's own equity.

The status of ongoing construction works is summarised in Table 2-17.

To prevent unauthorized land entry prior to the completion of expropriation or the formal execution of land entry protocols with affected owners or users, the SPV has developed land entry and exit protocols (see Appendix D) and has decided to incorporate into the Work Permit Form for Earthworks the land acquisition status of the areas to be accessed, to serve as a checkpoint prior to entry.

The following procedure is implemented by the Project for ongoing construction activities to ensure compliance with Lender's requirements:

- The completion status of expropriation shall be verified and signed by the SPV's Expropriation Manager prior to the issuance of any work permits for construction activities, including topsoil stripping, excavation, and embankment (fill) works.
- Land entry protocols shall be executed for each parcel prior to physical entry, following the completion of compensation payments as required under the Turkish Expropriation Law and/or in alignment with the RAP.
- No construction activity shall commence on a parcel unless the expropriation process or a mutual agreement has been completed and all required payments, including crop compensation for formal and informal users, have been made.
- Land exit protocols shall be executed only for land parcels acquired on a temporary basis, documenting the return and restoration of the land to the rightful party.

Table 2-17. Status of Ongoing Construction Works (as of May 2025)

No	Component	KM	Status of Works	Parcels Entered	Status of Land Take and Permitting (see Table 2-22 for forestry permits)	Users of Parcels Entered	Assets/ Structures on Parcels Entered	Status of Land Entry Protocols With Private Owners and/or Land Users
	Tunnels							
1	T2	57+355	**Construction ongoing** – The construction of the T2 entry-exit service roads are ongoing.	Location: Sagrin, Tasagil/ Manavgat Lot/parcel no: 551/1 (forest) 644/1 (forest)	**Forestry permit is in place for 644/1.** **Forestry permit application has been done, approval process is ongoing for 551/1.**	No	No	**Not applicable –** There were no private owners and/or land users on forest.
1	T3	60+947	**Construction ongoing –** Drilling activities have been completed. Approval from the Forestry Directorate is pending for the completion of the service road and commencement of portal excavation works."	Location: Tasagil, Manavgat Lot/parcel no: 644/1 (forest)	**Forestry permit is in place.**	No	No	**Not applicable –** There were no private owners and/or land users on forest.
2	T5	88+705	**Construction ongoing –** Portal excavation at T5 is ongoing, with tunnel excavation targeted to commence subsequently	Location: Ulukapi, Manavgat Lot/parcel no: 280/1 (forest)	**Forestry permit is in place.**	No	No	**Not applicable –** There were no private owners and/or land users on forest.
	Viaducts							
1	V4	77+899	**Construction ongoing –** Bored piling preparation works are ongoing.	Location: Kalemler, Yenikoy, Manavgat Lot/parcel no: 208/1 (forest) 159/1 (forest)	**Forestry permit is in place.**	No	No	**Not applicable –** There were no private owners and/or land users on forest.
1	V8	88+128	**Construction ongoing –** Bored Piling works are ongoing. (at P3R Pier) On the private parcel (Ulukapi, 167/3), a temporary container was placed on the land with the verbal consent of the owner (shareholder) and the site has been used as a machinery yard only.	Location: Bucakseyhler, Ulukapi/Manavgat Lot/parcel no: 241/1 (forest) 167/3 (private)	Forest parcels: **Forestry permit is in place.** Private parcels: **Consent protocol is in place** (for use of land prior to completion of expropriation) (see Appendix E for the template). The expropriation process **is due to start** and notifications under Article 8 will be sent in June 2025. **Article 8 negotiations are scheduled (by KGM) to take place on 1-3 July 2025.**	Yes	Yes (There is house, greenhouses and open agricultural fields of the user on the remaining part of this parcel 167/3. The container and equipment placed on the land does not interfere with or obstruct those ongoing activities of the owner)	**A written consent protocol has been signed** with the shareholder using the relevant part of the parcel (see Appendix E for the template). Land entry protocols will be executed with private owners upon completion of expropriation.

No	Component	KM	Status of Works	Parcels Entered	Status of Land Take and Permitting (see Table 2-22 for forestry permits)	Users of Parcels Entered	Assets/ Structures on Parcels Entered	Status of Land Entry Protocols With Private Owners and/or Land Users
2	V12	97+738	**Construction ongoing –** Service road works are ongoing.	Location: Cevizler, Haciali/ Manavgat Lot/parcel no: 189/1, 224/1 (forest)	Forest parcels: **Forestry permit is in place.**	No	No	Land entry protocols will be executed with private owners upon completion of relevant expropriation procedure and prior to land entry for earthworks/
	Main Road							
1	87+465 – 88+106		**Construction ongoing –** Suspended on 29 April 2025 as per General Directorate of Forestry's Instruction.	Location: Bucakşeyhler/ Manavgat Lot/parcel no: 241/1 (forest)	Forest parcels: **Forestry permit is in place.**	No	No	Land entry protocols will be executed with private owners upon completion of relevant expropriation procedure and prior to land entry for earthworks/
	Construction Camp Sites							
3	Temporary Construction Camp	59+450	**Mobilisation ongoing –** Mobilisation at the camp side is mostly completed, warehouse and workshop installation is ongoing.	Location: Tasagil/Manavgat Lot/parcel no: 644/1 (forest)	Forestry permit is **in place**. (4 March 2025, valid until 14 October 2027)	No	No	**Not applicable –** There are no private owners and/or land users on forest.
4	Main Construction Camp Site	64+500	**Mobilisation suspended –** Activities will resume once the relevant land acquisition and permitting processes are completed. On the private parcel (Tasagil, 515/415), which has been partly expropriated, a temporary container has been placed for electricity and water subscription procedures. No stripping or excavation activity has been performed.	Location: Tasagil, Manavgat Lot/parcel no: 653/1, 668/1 (forest) 515/415 (private)	Forest parcels: Forestry permit application has been done, **approval process is ongoing.** Private parcels: The parcels have multiple shareholders. Article 8 negotiations were held and agreement has been reached with 42/63 shareholders of these parcels. Article 27 lawsuit has been filed for the shares that could not be purchased through agreement. Interim decision was issued by the court on 4 June 2025. Payments **will be completed** by KGM within legal period (see Section 2.8.4).	Yes	Yes (There is a house and trees on the affected land. The container placed on the land does not interfere with or obstruct the ongoing use of the land by the owner. There has been no impact on any asset (crops, structures, trees, or the hose)	A written consent protocol was **signed** with the shareholder (see Appendix E for the template). Land entry protocols will be executed with private owners upon completion of relevant expropriation procedure and prior to land entry for earthworks/
5	Manavgat Construction Camp Site	87+800	**Mobilisation suspended –** Activities will resume once the relevant land acquisition and permitting processes are completed.	Location: Bucakseyhler/ Manavgat Lot/parcel no: 244/1 (forest)	**Forestry permit application has been done, approval process is ongoing.**	No	No	**Not applicable –** There were no private owners and/or land users on forest.

2.7. Past Land Acquisition

There is no **past land acquisition** conducted within the scope of the Project.

The land acquisition process for the Project was initiated only after the participation of the SPV, the private partner of the Project. No land acquisition, resettlement, or eviction activities were undertaken by KGM for the Project prior to SPV's engagement with the Lenders and their IESC[12]. Accordingly, the initial Article 8 negotiation meetings under the Expropriation Law were held on 6, 27, and 28 February 2025, marking the formal commencement of land acquisition efforts.

Therefore, the conditions under which a past land acquisition audit would be required are not applicable to this Project, as elaborated below:

- There is no preceding project sponsor or co-sponsor who undertook any land acquisition activities prior to the SPV's involvement.
- KGM did not conduct any land acquisition specific to the Project before appointment of the SPV through the BOT Implementation Contract on 14 October 2024 or before the start of engagement with the Lenders.

Comprehensive information regarding the land acquisition process that has been undertaken since February 2025 is provided in Section 2.8 (the following section).

The provisions and entitlements set out in this RAP shall apply to all Project-affected lands and assets with their respective owners and users (both formal and informal) including those for which acquisition processes have already been initiated by KGM.

2.8. Current Land Acquisition Status

Land acquisition activities for the Project – including both state-owned and privately-owned parcels – began in February 2025.

The decisions and decrees issued by the relevant national authorities regarding the expropriation works to be carried out within the scope of the Project are as follows:

- The **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[13] in the Official Gazette (No. 32857) on **30 March 2025** (referred to as **Accelerated Expropriation Decision**).
- The **Expropriation Decisions** were taken for the Project by **KGM**, as follows (as of June 2025):
    - **Motorway Service and Operation Centre** at KM 64+242.51 – 64+721.80: 5 December 2024 (Dec. No. 2024/78)
    - **Motorway construction** at KM 80+416.80 – 80+656.92: 5 December 2024 (Dec. No. 2024/78)
    - **Motorway construction** at KM 52+000 – 55+970: 23 January 2025 (Dec. No 2025/05)
    - **Motorway construction** at KM 82+953 – 92+946: 21 April 2025 (Dec. No. 2025/27)
    - **Motorway construction** at KM 73+725 – 82+994: 22 May 2025 (Dec. No. 2025/31)
    - **Motorway construction** at KM 92+933 – 104+178: 22 May 2025 (Dec. No. 2025/32)
    - **Motorway construction** at KM 55+829 – 74+072: 22 May 2025 (Dec. No. 2025/33)
    - **Motorway construction** at KM 104+167 – 115+975: 22 May 2025 (Dec. No. 2025/30)
    - **Manavgat East Connection Road** 100+500: 21 April 2025 (Dec. No. 2025/28)

[12] In October 2024, the Lenders retained an IESC to carry out ESDD for the Project and to review the ESIA disclosure package – including this RAP – in accordance with the applicable international standards, prior to public disclosure.

[13] https://www.resmigazete.gov.tr/eskiler/2025/03/20250330-5.pdf

The inventory of assets and valuation studies for parcels affected by the Project's current alignment have been conducted in accordance with the technical specifications of the KGM. These activities have been carried out since November 2024 by a certified national engineering firm ("**valuation contractor**"), appointed by the SPV and approved by KGM.

As part of this process, field identification works are undertaken to prepare detailed inventory of assets for each affected parcel. Subsequently, valuation reports are prepared in a progressive manner along the route, based on the identified assets.

Table 2-18 provides a summary of the status of these activities by route sections. **In summary, the inventory of assets has been completed for the main Motorway route (52+000 – 136+000) according to the tender phase route (1/5,000 route approved by KGM),** while the status of valuation reports varies depending on the progress of fieldwork and reporting across different segments. For the sections where valuation reports have been approved by **KGM**, **the land acquisition process has commenced** for private, public, and legal entity-owned parcels identified in the Project's earthwork schedules for the first and second quarters of 2025, as discussed in the subsequent sub-sections.

The expropriation plan for the entire route, excluding the Serik connection and the D400, has been approved by the relevant Cadastre Directorate in May 2025.

Table 2-18. Status of Inventory of Assets and Valuation Studies along the Route (as of June 2025)

KM	Field Identification Works – Inventory of Assets	Structure Identification Reports	Valuation Reports for Affected Parcels
52+000 – 56+000	Completed	Completed	Completed
56+000 – 74+000 (excluding 64+242.51 – 64+721.89)	Completed	Under preparation (Target: June 2025)	Under preparation (Target: June 2025)
64+242.51 – 64+721.89 (O&M Centre / Tasagil Main Construction Camp)	Completed	Completed	Completed
74+000 – 115+975 (excluding 80+416 – 80+656.92)	Completed	Under preparation (Target: June 2025)	Under preparation (Target: June 2025)
80+416 – 80+656.92 (Service Area during operation, Siseler Concrete Plant during construction)	Completed	Completed	Completed
115+972 – 127+881	Suspended for Akdam and Cakallar Partially ongoing for Alara (excluding approximately 50 parcel)	-	-
127+877 – 136+000	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Serik Connection Road and D400	Under preparation[14]	- (Target: July-August 2025)	- (Target: July-August 2025)
Tasagil Connection Road	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Manavgat Connection Road	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Manavgat East Connection Road	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Alarahan Connection Road	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Konakli Connection Road	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)
Alanya West Connection Road (139+797 – 141+705)	Completed	Under preparation (Target: July 2025)	Under preparation (Target: July 2025)

[14] The initial identification for this section had to be revised due to a route change/

2.8.1. Privately-owned Parcels

Based on the Accelerated Expropriation Decision, KGM has the authority to initiate accelerate expropriation court proceedings (**Article 27**) in line with the construction schedule and subject to the availability of the expropriation budget for compensating right holders. However, **in this Project, KGM has prioritised negotiated settlements through the Article 8 process (purchasing method**) under the Expropriation Law. Accordingly, KGM will invite all owners and shareholders, including heirs[15], to participate in Article 8 negotiations and Article 27 will be used by KGM as a last resort, only after Article 8 negotiations and consultations with the rightful owners and shareholders have been held and failed, or if they do not attend the reconciliation negotiations despite the consultation efforts made.

For parcels that had priority under the construction programme agreed between KGM and the SPV, and for which the valuation had been approved by KGM**, the expropriation process was initiated by KGM in February 2025** through the issuance of Article 8 invitations and the conduct of negotiation meetings with participating owners and shareholders. It will progress lot by lot, in line with the availability of the expropriation budget. Valuation rates for land and assets will be updated by KGM **quarterly**.

To date, **Article 8 invitations have been issued and negotiation meetings were conducted** in the settlements listed in Table 2-19. KGM has scheduled the next negotiation meetings to take place as follows:

- 23,24 and 26 June 2025: **Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacıisali, Hacıobası**
- 1-3 July 2025: **Yukarıışıkları, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar**

Table 2-19. Article 8 Negotiation Meetings held to Date (as of June 2025)

Settlement	Relevant Project Component	Negotiation Meeting Date	Negotiation Meeting Location
Siseler, Manavgat	Route: 80+416.80 – 80+656.92 Facility: Concrete Plant (during construction) and Siseler MSF (Type D) (during operation)	6 February 2025 (10:00)	Tasagil Forestry Operations Directorate, Manavgat
Tasagil, Manavgat	Route: 64+242.51 – 64+721.89 Facility: Main Construction Camp Site (during construction) and O&M Centre (during operation)	6 February 2025 (14:00)	Tasagil Forestry Operations Directorate, Manavgat
Deniztepesi, Serik	Route: 52+000 – 56+000	27 February 2025 (09:30-14:00)	Deniztepesi Mukhtar's Administration Hall
Sariabali, Serik	Route: 52+000 – 56+000	28 February 2025 (09:30-14:00)	Deniztepesi Mukhtar's Administration Hall

[15] As a standard practice, KGM's regional directorate identifies deceased persons and their heirs through the Central Civil Registration System (MERNIS) and sends Article 8 notifications to invite them to participate in the negotiations.

The current status of expropriation of privately-owned parcels, according to their land entry status, is presented in Table 2-20.

Table 2-20. Expropriation Status of Privately-owned Parcels within the Expropriation Corridor (as of June 2025)

Category as per Impact Status	Total Number of Parcels	Category A Purchased by KGM (through agreement and purchase as per Article 8 of Exp. Law)	Category B Expropriated by KGM (through Article 27 accelerated expropriation lawsuits)	Category C Expropriation by KGM has **not** been completed yet
Parcels entered (Affected Private Parcels)	2[16]	0	0	2
Parcels not Entered to date (Non-affected Private Parcels)	2,083	1	0	2,082
Total – Private Parcels	**2,085**	**1**	**0**	**2,084**
Status of Title Deed Transfers	**2,085**	**1**	**0**	**-**

Table 2-21 summarises the status of agreement protocols signed with the shareholders who have reached an agreement with KGM. For individuals who either do not attend the meeting despite receiving the notice or attend the meeting but refuse to sign the Procurement or Dispute Record, an 'Abstention Record' is issued by KGM after the meetings are concluded.

Table 2-21. Status of Agreement for Privately-owned Parcels (June 2025)

Settlement			Agreement Protocols			Number of Parcels per Expropriation Status		Parcels and Owners with No Action Taken		
Name	Number of Parcels	Number of Private Parcels	Number of Parcels with Signed Protocols	Number of Shares with Signed Protocols	Number of Owners with Signed Protocols	Fully Expropriated	Partially Expropriated	Number of Parcels	Number of Shares	Number of Owners
Sariabali, Serik	126	3	1	1	1	0	1	2	2	2
Deniztepesi, Serik	16	10	9	411	227	0	9	1	781	294
Siseler, Manavgat	4	4	2	4	4	1	1	2	21	21
Tasagil, Manavgat	7	3	2	42	27	0	2	1	30	24
Total	**153**	**20**	**14**	**437**	**259**	**1**	**13**	**6**	**855**	**341**

Source: SPV, June 2025.

[16] Written consent protocols were signed with the shareholders using the parcel: 1) Ulukapi, Manavgat 167/3 (V8 at 88+128; a temporary container was placed on the land and the site has been used as a machinery yard only, and 2) Taşağıl, Manavgat 515/515 (Main construction camp site at 64+500; a temporary container has been placed for electricity and water subscription procedures. No stripping or excavation activity has been performed).

2.8.2. State-owned Parcels

State-owned parcels are allocated to the Project through procedures carried out by KGM in coordination with the relevant authorities, without requiring payment, as outlined below. These parcels will only be accessed by the SPV and/or EPC Contractor for Project purposes once the allocation process is completed – that is, once their status is officially changed in accordance with the Pasture Law, registered as road on behalf of the Treasury, and the right of use is formally granted to KGM by the Treasury.

- **Treasury – forest parcels:** The Project has submitted formal applications to the relevant District[17] Forestry Operations Directorates to obtain the necessary forestry permits for forest lands to be used within the scope of the Project.
- **Treasury – pasture parcels:** Allocation of pasture parcels to the Project requires a change in their allocation status by the Provincial Directorate of Agriculture and Forestry, in accordance with the Pasture Law. The Project will formally submit applications to the relevant District Directorates of Agriculture to initiate this process, in alignment with the construction schedule that necessitates access to these pasture parcels (noting that there are three pasture parcels along the entire expropriation corridor).
- **Non-registered parcels ("*tescil harici*"):** These parcels are under the ownership and control of the state (treasury) and are not subject to expropriation procedures under the Expropriation Law. They are allocated to the Project by the state-treasury. Any assets present on these parcels are identified through the consent letter process and are managed in accordance with the requirements of the relevant institutions.

The acquisition status of these state-owned parcels within Motorway's expropriation corridor is summarised below in Table 2-22 according to their land entry (impact) status.

The acquisition status of state-owned parcels that overlap with the temporary facility sites is presented in Section 2.3.9.

[17] Serik, Tasagil, Manavgat and Alanya district directorates.

Table 2-22. Acquisition Status of State-owned Parcels within the Expropriation Corridor (as of June 2025)

Category	Acquisition Method	Total Number of Parcels	Status of Land Entry		Permitting Status for Parcels Entered	
			Parcels not Entered to Date	Parcels Entered	Allocation/ Consent/ Permit Completed	Allocation/ Consent Application Done – Process in Progress
Treasury parcels	Allocation	810	809	1 Ulukapi, Manavgat (Non-registered – Yol-1)	None	1 (Application has been done in May 2025 for Non-registered – Yol-1, **ongoing**)
Treasury – forest	Forestry permit	143	135	8	Permit for the relevant parts of the following route sections have been **obtained** (see below): 52+000 – 56+700 57+200 – 70+000 71+000 – 85+800 86+100 – 86+800 87+300 -- 119+000 120+600 – 141+000	1
				Sagrin (1): 551/1 – Tunnel 2 (KM57+355)	--	Sagrin: 551/1 **Forestry permit application has been done, approval process is ongoing for 551/1.**
				Tasagil (1): 644/1	**Obtained** as part of permit for KM:61+000-62+500: Tasagil: 644/1	--
				Ulukapi (1): 280/1	**Obtained** as part of permit for KM:88+550-89+800: Ulukapı: 280/1	--
				Kalemler, (1): 208/1	**Obtained** as part of permit for KM 75+770 – 78+130: Kalemler: 208/1	--
				Yenikoy (1): 159/1	**Obtained** as part of permit for KM:78+130-78+560: Yenikoy: 159/1	--
				Bucakseyhler (1): 241/1	**Obtained** as part of permit for KM 87+700-88+160: Bucakseyhler: 241/1	--
				Cevizler (1): 189/1	**Obtained** as part of permit for KM 97+850-98+600: Cevizler: 189/1	--
				Haciali (1): 224/1	**Obtained** as part of permit for KM 97+600-97+790: Hacıali: 224/1	--
Treasury – pasture	Change of allocation	3	3	0	To be completed **prior to land entry**	--
Non-registered	Allocation	335	335	0	To be completed **prior to land entry**	--

Source: SPV, June 2025.

2.8.3. Parcels Owned by Legal Entities

Parcels owned by legal entities are subject to expropriation in accordance with the provisions of the Expropriation Law. In order to facilitate land entry prior to the completion of expropriation procedures, KGM officially notified the legal entities holding assets within the Expropriation Corridor about the Accelerated Expropriation Decision, and requested that these institutions provide their consent or official opinion regarding the use of the parcels under their ownership.

The status of consent by the legal entities is summarised in Table 2-23. The expropriation process for the respective parcels will be completed in due course.

Table 2-23. Legal Entities with Parcels within the Motorway Expropriation Corridor (as of June 2025 – no change since May)

Legal Entity	Application Date and Number	Response Date and Number	Status of Consent	Status of Impact (Land Entry) on Legal Entity Parcels
Municipalities				
Alanya District Municipality	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Antalya Metropolitan Municipality	10.01.2025 /-1719559	07.04.2025 /-527831	**A letter of consent has been obtained.** (Condition: The project was deemed appropriate on the condition that the matters outlined in the opinion letter are complied with, and that any damage caused to the group road is repaired and restored to its original condition following the completion of road construction works by the KGM)	0
Antalya Metropolitan Municipality - Directorate General of Antalya Water and Sewerage Administration (ASAT)	10.01.2025/ -1719559	14.03.2025 /-228891	**A letter of consent has been obtained.** (Condition: The planned work within the investigation area was deemed appropriate provided that the matters outlined in the opinion letter and the provisions of the legislation are complied with, and that all risks are carefully evaluated)	0
Manavgat District Municipality	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Others				
Kepez and Antalya Region Electricity Power Plants Inc. (Kepez ve Antalya Havalisi Elektrik Santralleri T.A.Ş)	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Kepez Electricity Joint Stock Company	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Manavgat Organized Industrial Zone (Manavgat OSB)	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0

Legal Entity	Application Date and Number	Response Date and Number	Status of Consent	Status of Impact (Land Entry) on Legal Entity Parcels
Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works – 13th Regional Directorate	10.01.2025/ -1719559	12.02.2025/ -5553509	**A letter of consent has been obtained.** (Condition: Irrigation and infrastructure projects are located along the planned motorway route. At the kilometers where the pipeline corridors intersect the motorway route perpendicularly, box culverts with minimum dimensions of 3.00 x 3.00 meters must be constructed, incorporated into the project design, and the necessary meter-based protocols must be executed with the Institution to ensure the crossings)	0
Ministry of Environment, Urbanization and Climate Change - Housing Development Administration of Turkey (TOKI)	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Toslak Village Nurdağı Foundation	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Turkish Electricity Distribution Corporation (TEDAS) – 2nd Regional Directorate	10.01.2025/ -1719559	12.02.2025/ -1237899	**A letter of consent has been obtained.** (Condition: The energy facilities located in the required areas must be relocated by the Project free of charge; project approval must be obtained for the facilities to be relocated; ownership and/or forestry permits must be secured for the areas where the facilities will be situated following relocation; all procedures are carried out in accordance with the standard protocols regarding relocations; Akdeniz EDAS and TEDAS must be informed about the planned works).	0
Turkish Electricity Transmission Corporation (TEIAS) – 19th Regional Directorate	10.01.2025/ -1719559	22.01.2025/ -2902285	A protocol will be signed between the Project and the entity.	0
Türkiye Religious Affairs Foundation (*Türkiye Diyanet Vakfı*)	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0
Ulugüney Village Course and School Students Association (Alara)	-	-	A consent letter will be obtained in due course, in alignment with the construction schedule.	0

Source: SPV, June 2025.

2.8.4. Court Cases as per Expropriation Law

The Project has in place an **Accelerated Expropriation Decision** issued by the President of Türkiye (**Presidential Decree No. 9708)** and published in the Official Gazette[18] (No. 32857) on **30 March 2025**.

A detailed description of the accelerated expropriation process, in accordance with Article 27 of the Expropriation Law, is provided in the RAP.

The lawsuits filed by KGM as per this Decision and the status of the process for respective parcels are summarised in Table 2-24.

Table 2-24. Status of Lawsuits filed by KGM to Date (as of June 2025)

Settlement	Relevant Project Component	Parcel No.	Number of Private Share holders	Status of Article 8 Negotiations	Status of Article 27 Lawsuits filed by KGM	Status of Land Seizure Value Deposition[19] by KGM	Status of Land Entry by the Project	Status of Article 10 Lawsuits filed by KGM
Tasagil, Manavgat	Main Construction Camp Site (during construction) O&M Centre (during operation)	515/414	13	Negotiation meeting was held on 6 February 2025 (see Table 2-19)	Lawsuit was filed on 21 April 2025 (2025/10). **Interim decision was issued** by the court on 4 June 2025. **Article 27 Land Seizure Decision will be issued** after the deposition of Land Seizure Value.	Payments **will be completed** by KGM within legal period.	Not entered[20] for top soil stripping or construction (will take place after depositionof Land Seizure Value and execution of Article 27 Land Seizure Decision by the court.	To be filed after Article 27 court decision
		515/415	3	Same as above	Same as above	Same as above	Not entered	Same as above
		515/44	5[21]	Same as above	Same as above	Same as above	Not entered	Same as above

Source: SPV, June 2025.

[18] https://www.resmigazete.gov.tr/eskiler/2025/03/20250330-5.pdf

[19] The Project obtains the legal right of access to the land following the issuance of the Article 27 decision. The compensation amounts deposited for parcels expropriated as per Article 27 are immediately accessible to their respective owners or shareholders.

[20] On the private parcel (Tasagil, 515/415), which has been partly expropriated, a temporary container has been placed for electricity and water subscription procedures. No stripping or excavation activity has been performed

[21] There are four distinct names listed, indicating that one of the five shareholders may be a duplicate.

2.9. Zoning Plan Implementation

In accordance with the Zoning Law (Law No: 3194, 1985), 1/1,000 scale zoning implementation plans exist for the sections listed in Table 2-25.

The implementation status of parcels within the 1/1,000 zoning plan implementation area is categorized into two groups:

- **Executed Parcels ("uygulama görmüş")**: These are parcels where the development readjustment share (*Düzenleme Ortaklık Payı – DOP*) has already been deducted in accordance with the relevant legal provisions.
- **Non-Executed Parcels ("uygulama görmemiş")**: These parcels have not yet undergone the deduction of the development readjustment share (*Düzenleme Ortaklık Payı – DOP*). They are pending implementation.

Table 2-25. Motorway KM Chainages for which 1/1,000 Scale Implementation Zoning Plans are in Place

Motorway KM Chainage	Neighbourhood	Number of Parcels	Implementation Status
Serik Connection Road 10+415.55 – 10+844.08	Cumalı, Serik	10 parcels (10,896.13 m^2): - 10 private (all constructible plot)	Executed (“*uygulama gormus*”)
Tasagil Connection Road	Tasagil, Manavgat	50 parcels (86,073.07 m^2): - 35 private constructible plot (*arsa*) - 6 treasury - 6 treasury – non-registered - 2 litigious - 1 legal entity	Executed (“*uygulama gormus*”) for 36 parcels
Manavgat Connection Road	Evren, Manavgat	7 parcels (3,535.51 m^2): - 6 private (all constructible plot) - 1 treasury	Executed (“*uygulama gormus*”) for 7 parcels
	Ilıca, Manavgat	1 private parcel (2,664.48)	Executed (“*uygulama gormus*”)
Alanya West Connection Road 139+903.58 – 141+781.13	Telatiye, Alanya	73 parcels (308,798.77 m^2): - 54 private (5 of them constructible plot – *arsa*) - 7 non-registered - 7 road - 3 forest - 1 legal entity - 1 treasury	Executed (“*uygulama gormus*”) for 5 parcels

Source: SPV, May 2025.

According to Article 13 of the BOT Contract, the SPV shall notify the KGM of the zoning plan amendment requests required due to expropriation, project and project changes required to fulfill the construction and operation obligations.

For all expropriation transactions to be carried out including Zoning Plan Amendment and New Zoning Plan, preparation, engineering services and other relevant works under the scope of the Administration shall be carried out by the SPV. Necessary upper and lower scale zoning plan and zoning plan amendments will be made by the SPV according to the approved Project. In case there are changes in the Project at the end of the Construction Period, upper and lower scale zoning plan amendments and new zoning plans will also be made by the SPV. Necessary applications for zoning plan amendments arising from Project and Project changes and requested by the SPV will be made by the KGM. **The SPV, in coordination with the EPC Contractor, undertakes the necessary actions in this regard pursuant to the provisions of the BOT Contract.** The SPV will work in coordination with the respective municipalities that will carry out the zoning plan implementation.

The list of executed parcels (“*uygulama gormus*”) is presented in Table 2-26.

Table 2-26. List of Parcels Subject to Execution ("*Uygulama Gormus*") within the Scope of 1/1,000 scale Zoning Implementation Plan

District	Settlement	Lot/Parcel no.	Parcel Type	Title Deed Area (m^2)	Expropriated Areas (m^2)
Serik Connection Road 10+415.55 – 10+844.08					
Serik	Cumali	236/1	Constructible Plot	4617.91	2180.13
		236/2	Constructible Plot	508.94	508.94
		236/3	Constructible Plot	467.71	300.20
		236/6	Constructible Plot	1550.70	758.30
		236/7	Constructible Plot	1550.68	824.99
		236/8	Constructible Plot	1513.52	886.36
		235/2	Constructible Plot	712.70	712.70
		235/1	Constructible Plot	3396.82	2335.38
		234/4	Constructible Plot	26803.80	947.95
		234/1	Constructible Plot	1441.18	1441.18
Tasagil Connection Road					
Manavgat	Tasagil	908/1	Constructible Plot	5749.2	1797.75
		908/2	Constructible Plot	2000	1177.07
		908/3	Constructible Plot	2292.62	1447.79
		920/1	Constructible Plot	1277.82	218.76
		910/2	Constructible Plot	926	532.12
		920/2	Constructible Plot	842.19	249.3
		920/7	Constructible Plot	1056.9	632.86
		920/8	Constructible Plot	535.9	535.9
		920/9	Constructible Plot	571	571
		920/4	Constructible Plot	1186.3	147.35
		901/1	Constructible Plot	1900	609.81
		922/1	Constructible Plot	1349.99	489.1
		922/2	Constructible Plot	1153.18	1153.18
		910/3	Constructible Plot	1147.04	546.06
		910/4	Constructible Plot	4253.58	577.24
		901/2	Constructible Plot	2765.99	1762.96
		902/1	Constructible Plot	2294.9	1675.51
		902/2	Constructible Plot	3069.09	3069.09
		515/172	Constructible Plot	6834.7	6834.7
		903/1	Constructible Plot	2257.8	2257.8
		913/3	Constructible Plot	3420.7	953.91
		903/2	Constructible Plot	3267.58	2052.59
		304/1	Constructible Plot	448.54	448.54
		304/3	Constructible Plot	291.2	291.2
		305/1	Constructible Plot	874.22	874.22
		305/2	Constructible Plot	448.78	448.78
		311/17	Constructible Plot	488.33	488.33
		305/3	Constructible Plot	395.29	395.29
		311/16	Constructible Plot	410.19	410.19
		305/4	Constructible Plot	380.81	380.81

District	Settlement	Lot/Parcel no.	Parcel Type	Title Deed Area (m^2)	Expropriated Areas (m^2)
		311/15	Constructible Plot	405.48	405.48
		305/5	Constructible Plot	485.87	485.87
		311/14	Constructible Plot	491.26	420.44
		300/1	Constructible Plot	4601.9	569.87
		300/2	Constructible Plot	4438.61	463.21
		515/126	Constructible Plot	4274.99	279.11
Manavgat Connection Road					
Manavgat	Evren	696/1	Constructible Plot	2,395	725.54
		146/10	Constructible Plot	842.83	209.11
		712/1	Constructible Plot	1441	1440.71
		176/1	Constructible Plot	1,000.23	377.45
		176/2	Constructible Plot	1,201.09	52.13
	Ilıca	0/162	Constructible Plot	2664.48	163.91
Alanya West Connection Road 139+903.58 – 141+781.13					
Alanya	Telatiye	360/3	Constructible Plot	1148.8	811.91
		528/1	Constructible Plot	1304.42	1304.42
		359/1	Constructible Plot	2149.66	2149.59
		303/6	Constructible Plot	4605.53	1570.69
		410/1	Constructible Plot	5894.92	3531.72

Source: SPV, May 2025.

Setback Distances according to the Regulation on Facilities that will be Built or Opened Adjacent to Roads

The Regulation on Facilities that will be Built or Opened Adjacent to Roads defines the following Setback Distances for residential buildings, commercial buildings and hazardous materials storage facilities:

- For residential buildings – 5 meters from the road boundary (defined as property boundary in case of expropriated parcels)
- For commercial buildings – 25 meters from the road boundary (defined as property boundary in case of expropriated parcels)
- For hazardous materials storage facilities – 50 meters from the road boundary (defined as property boundary in case of expropriated parcels)

Based on information provided by the SPV, KGM's 13th Regional Directorate sent official letters to the municipalities of Serik, Manavgat, Alanya, and Antalya Metropolitan Municipality, requesting the base layers of the zoning plans, sharing the Project, and requesting its incorporation into the plans.

The setback distances will be applicable exclusively to planned (zoned) areas and shall not extend to unzoned or agricultural lands.

In the event of zoning revision processes at the relevant parts of the route, relevant administrative bodies, including municipalities, will be consulted proactively to track developments and plan actions accordingly. The Project will review the zoning plans and maintain regular communication with these authorities to monitor progress and align on planning decisions that may affect privately owned plots, and confirm that the applicable setback distances for the Motorway have been duly incorporated into these plans.

Affected landowners will be informed of the legal procedures under applicable laws, including the public announcement of revised zoning plans and their right to submit objections within the legally defined period. Where appropriate, the Project will provide guidance to ensure stakeholders are aware of and able to exercise their rights effectively.

2.10. Avoidance and Minimisation

The tender for the broader route between Afyon and Alanya was held by KGM in **2010** and the preliminary designs were subsequently prepared by the awarded design company and approved by the KGM in the pre-BOT tender phase.

The BOT tender for the Project was conducted by KGM in **2023**. The BOT Contract, signed between KGM and the SPV on **14 October 2024**, is based on the Project route and design approved by KGM prior to the BOT tender process (referred to as the "tender phase route").

Following the execution of the BOT Contract, the SPV has initiated design and engineering works for the optimization of the route addressing technical, economic, environmental and social aspects and constraints. **In November 2024**, a **Preliminary Project Route and Justification Report** (for the route between KM 52+000 to km 136+000) was issued by the SPV for the Project and approved by KGM.

The design, engineering, and route optimisation processes undertaken for the Project to date have been guided by the principle of avoiding and minimising environmental and social risks and impacts, as stipulated by, and in consultation with, the relevant national authorities. This approach has informed key decisions related to route selection, land use planning, and the siting of critical infrastructure components, with the aim of reducing potential adverse effects on local communities and the natural environment. As is well established, motorway projects implemented by the KGM are planned and designed in accordance with KGM's design criteria and technical specifications. In line with these institutional standards, **the minimisation of land use and expropriation is considered a fundamental criterion during the planning and preliminary design phases. The objective is to reduce expropriation costs and mitigate the social and economic impacts associated with land acquisition processes.**

In addition to this, other important criteria considered by KGM include the following, as further detailed in the Project ESIA:

- Soil conditions and geohazards,
- Biodiversity and cultural heritage elements,
- Regional and local zoning and development status,
- Construction and O&M costs,
- Potential for future expansion, and
- Transportation safety and user comfort.

Specific to the Antalya–Alanya Motorway route, the following site-specific considerations were key in the appraisal of alternatives and the selection of the final alignment, as outlined in the Preliminary Project Route and Justification Report (*SPV, November 2024*):

- The route is situated between the Mediterranean Sea to the south and the Taurus Mountains to the north. Due to these geographical constraints, the area does not allow for a wide corridor from the perspective of the Project working area. In addition to having a narrow workspace, it is also constrained by the inability to go beyond the Taurus Mountains to the north and the inability to move below the existing D-400 Highway to the south. Thus, the route has to lie in between these two limitations.
- Given the feasibility of constructing interchanges in close proximity to existing state roads, the connection roads were designed with minimal lengths, thereby reducing land acquisition requirements for the motorway connections.
- In determining the locations of interchanges, factors such as the region's level of development, existing and anticipated traffic flow volumes and directions were evaluated. Interchange design studies were conducted in areas where site conditions were deemed suitable. While tourism and agriculture are the region's primary economic activities, the significant contribution of tourism to the national economy was also taken into account. Accordingly, the integration of Antalya's local traffic network, a major tourism hub, into the planned motorway through strategically located interchanges has been targeted to support and enhance the region's potential in this sector.

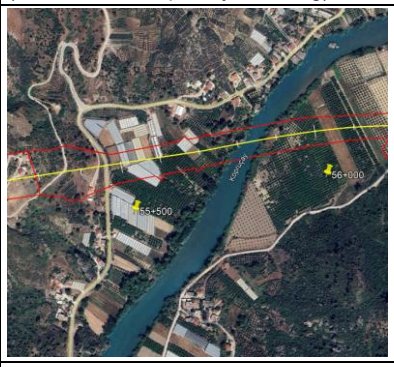
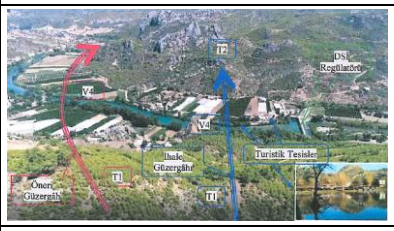
- Service road crossings have been designed to ensure the continuity of existing roads disrupted by the motorway alignment and to preserve the functionality of the local road network as it existed prior to motorway construction. The positioning of these crossings aims to minimise disruption to local transportation in the affected areas and to prevent limitations on the region's economic and social mobility.
- The following developments that have occurred along the Project route since the initial design in 2010s have been taken into consideration by the SPV during the design and engineering works carried out after the execution of the BOT Contract:
    - Expansion of industrial areas
    - Expansion of residential areas
    - Emergence of new transportation networks
    - Current status of agricultural lands and greenhouse areas
    - Expropriation issues
    - Technical issues (including addition of the D400 Motorway connection to the Project, update of the design speed to 140 km/h, construction related difficulties, weak soil conditions among others)
    - New transmission lines

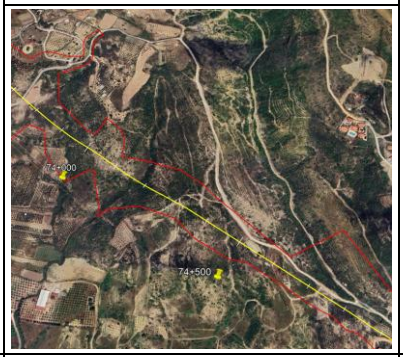
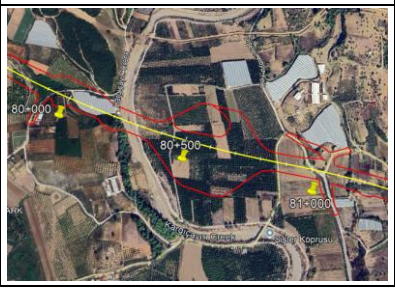
In light of the criteria mentioned above, the key route modifications carried out by the SPV as part of ongoing efforts to optimise the design and route, and minimise the Project's environmental and social risks, including land acquisition-related impacts, are summarised in Table 2-27.

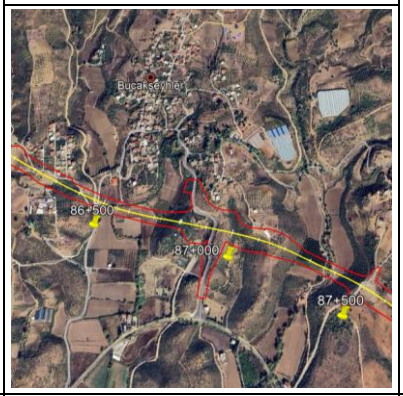
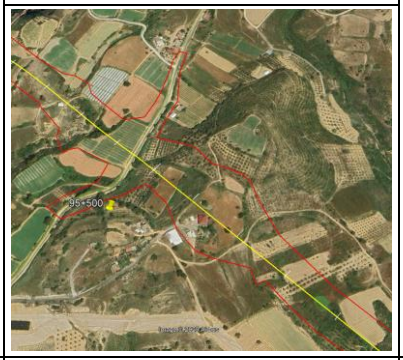
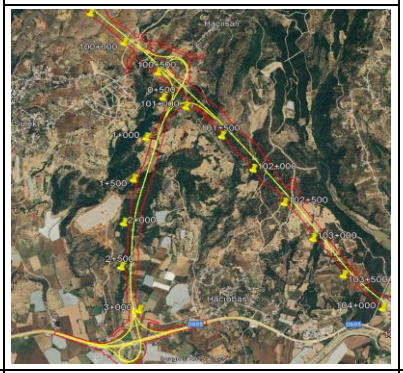
As part of the RAP study, the RAP Consultant has actively engaged with the technical teams of the SPV and EPC Contractor, encouraging the Design Team to identify and evaluate feasible design measures to avoid and/or minimise displacement impacts. The SPV and EPC also maintain ongoing engagement with key Project stakeholders – including municipalities, land and structure owners, and KGM – throughout the pre-construction period. This process enables the integration of local requests for route adjustments or design modifications where technically and financially feasible, with the overall goal of avoiding or minimising physical and/or economic displacement. Consequently, additional avoidance and minimisation measures may be integrated into the Project in parallel with the preparation of this document.

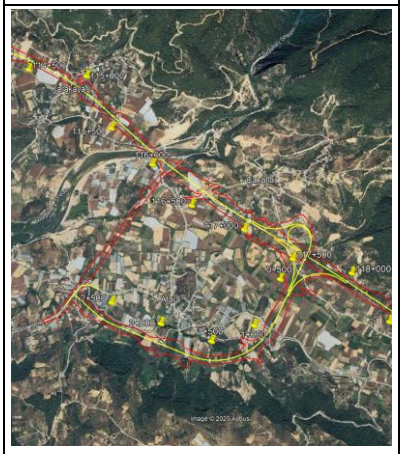
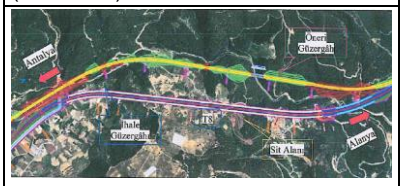
Table 2-27. Summary of the Route Assessments and Modifications done for the Project

District	Section/ KM Chainage	Description of the Route Modifications (Justifications and/or Results)
Serik	D-400 State Road	• The currently 2x2-lane D-400 State Road has been redesigned as a 2x3-lane road along the specified segment. Along the approximately 11 km section of the D400 highway, there are currently three interchanges. Among these, the Cardakli and Kocayatak interchanges are currently at-grade, while the Kadriye interchange is already a grade-separated junction. To ensure smooth transit traffic along the main axis, the currently at-grade Cardakli and Kocayatak interchanges have been redesigned as grade-separated interchanges. The Kadriye interchange has been revised by expanding the main road from 2 lanes to 3 lanes in each direction, while retaining its existing layout. • Given the flat topography of the locations where the grade-separated Çardaklı and Kocayatak interchanges are to be constructed, bridge-type interchanges have been proposed. This approach avoids the need for deep underpasses, takes into account potential drainage problems, and preserves the aesthetic character of the surrounding area.
Serik	52+500 – Serik Connection Road	• The Serik Connection Road passes through a location in the plain that consists of weak soil and a wide area of agricultural land and greenhouses. Along the Connection Road, the vertical alignment was revised, and embankment heights were lowered, taking into account culvert and irrigation channel crossings. In this way, the connection road, which runs primarily through agricultural land, was

District	Section/ KM Chainage	Description of the Route Modifications (Justifications and/or Results)
		designed to minimise impact on those structures and crossings and accordingly reduce expropriation costs. • Along the Serik Connection Road, the vertical alignment was revised, and embankment heights were lowered, taking into account culvert and irrigation channel crossings. This adjustment reduced the need for expropriation of agricultural lands, prevented the division of the plain by high embankments, and enabled passage over weak-soil plains using low embankments.
Serik	52+500; 11+500 Serik Connection Road 	• The Serik Connection Road terminates at the D400 State Road via a trumpet interchange. When determining the location of the trumpet interchange, the presence of industrial facilities and developments in the surrounding area was a key consideration. In the tender conducted in the 2010s, the planned interchange location was positioned in a way that would require the expropriation of existing facilities in the area. To avoid this, the interchange location was shifted westward in the new design, thereby preventing the expropriation of facilities situated within the interchange zone.
Serik	54+300 (T1 Tunnel Entrance Portal)	• After the Serik K1 Interchange, the route alignment proceeds in a northeast direction, following the north-facing slopes. The route enters a tunnel (T1) near KM 54+300, passing north of Sariabali village. At the tunnel entrance, attention has been paid to the DSİ siphon irrigation systems located on both the right and left sides.
Serik	55+500 (V4 Viaduct – Koprucay Crossing) 	• Immediately after exiting the T1 tunnel, the route passes through agricultural land and intersects with Koprucay. This crossing is achieved via the Koprucay viaduct. At the Koprucay crossing, the alignment proposed during the tender phase was shifted slightly to the north and the design has embedded measures to protect the natural environment, residential areas, and commercial establishments, and the most suitable geometry was selected in terms of ground suitability.
Serik	56+000 	• At the entrance of the T2 Tunnel along the tender route, the DSI regulator and the bridge foundations for the balanced cantilever (V4) are in interaction. Additionally, several tourist facilities around V4 are adversely affected by the route. In this section, the alignment was shifted northward, proceeding along the slope using open cut and fill, and the T2 Tunnel was cancelled.
Serik	56+500 	• After KM:56+250, the route between Viaduct-4 and Viaduct-5 runs along the lower elevations on the southern slope of Koprucay and progresses through open earthworks. In this section, the route was shifted southward toward the slope as much as possible to minimise the impact on the agricultural lands located to the north of the corridor.

District	Section/ KM Chainage	Description of the Route Modifications (Justifications and/or Results)
Serik	60+920 (T4 Tunnel Entrance Portal)	• Further along, the alignment proceeds parallel to the existing road through the middle of two slopes. In this section, topographic conditions and steep slopes have necessitated significant cuts and fills. Around KM 60+920, the mountainous area is crossed via the T4 Tunnel. In the tunnel area, the Motorway route intersects with the Seydisehir–Antalya Railway Project. At this intersection, the railway line passes beneath the T4 Tunnel, and in order to provide sufficient clearance between the two structures, the vertical design of the Motorway tunnel has been planned with a pitched roof profile.
Serik	68+758 	• Transverse crossings along the route were reviewed, with a focus on maintaining the continuity of existing roads. Accordingly, at Km:68+758, secondary road works were carried out by adding the necessary structures for the Solar Power Plant area and for other sections deemed necessary.
Manavgat	74+000 	• The valley containing Kızıllar Creek and agricultural lands is crossed by a 376.8-meter-long viaduct, planned between Km:71+133 and Km:71+510. Following this, in the section where the alignment lies on the southern slopes of Değirmensırtı Hills, the route was brought as close to the slopes as possible to avoid entering agricultural lands. However, due to irregular topography, it was necessary to apply high slope cuts in certain areas.
Manavgat	76+000 	• The alignment proceeds along the southern boundary of the zoning plan of the Evrenseki Municipality, avoiding entry into the planned development area, and turns toward the north of the Kalemler settlement to minimise impact on residential areas. The highly rugged topography between these two settlements has necessitated a series of cut and fill operations.
Manavgat	80+500 	• Immediately after the Kargicay River crossing at KM 80+250, there is an MSF located along the alignment. The facility is situated in an agricultural area, but this location was selected due to the lack of a more suitable topographic alternative in the vicinity. Following the MSF, an overpass is planned at Km:81+058 to ensure the continuity of existing roads.

District	Section/ KM Chainage	Description of the Route Modifications (Justifications and/or Results)
Manavgat	85+000 	• After the Manavgat K1 Interchange, the route passes north of the Yukarisiklar and Dikmen settlements, avoiding the division of the settlement and minimising interaction with existing structures. The alignment then crosses Akçay Stream via a viaduct approximately 595 meters in length.
Manavgat	87+000 	• Following the viaduct crossing, the route proceeds south of Bucakseyhler and intersects with the ancient Side Waterway. At the intersection point, the ancient waterway is located underground. This intersection was addressed during the approved preliminary design phase in consultation with the Antalya Regional Directorate of the Cultural Heritage Protection Board, including field visits and discussions with board officials. The alignment was shaped in line with their guidance. To avoid high embankments, protect nearby agricultural land, and prevent any physical interference with the historic waterway, a viaduct was also planned for this section. The total length of the viaduct planned for the Side Waterway crossing is 381 meters.
Manavgat	95+500 	• A local road providing access between Belenobası and Karaöz settlements is located at Km:95+450. In this section, the road has been positioned where the motorway transitions from embankment to cut, in a way that preserves existing structures and maintains the geometry and corridor of the current road without disruption. Due to the presence of a **1st Degree Archaeological Site** identified around Km:95+500, the alignment corridor was shifted southward in this section resulting in impact on a few structures. The aim was to avoid potential issues during the construction phase by ensuring the route passes outside the boundaries of the protected area. In this segment, the alignment lies within a cut section, and care was taken to ensure that the cut slopes do not encroach upon the protected site.
Manavgat	100+500 Manavgat East (Haciobasi) Connection Road 	• The Manavgat East Connection Road branches off from the Manavgat East K1 Interchange and extends southward to connect with the D695 State Road. The connection road has been positioned to the east of Sulek and to the west of Haciobası – using open-cut and fill methods – to minimise impact on agricultural lands.
Manavgat	102+000 – 105+000 	• There is a tunnel located around Km:103+800 on the tender alignment. In this area, development has increased over time. It was determined that the tunnel cover is not sufficient to prevent damage to the structures above. If the tunnel were to pass through this section, it would at minimum require the evacuation or even expropriation of buildings for safety reasons. To mitigate risks during construction, the proposed alignment was shifted southward, away from the buildings, and the area was traversed using open excavation.

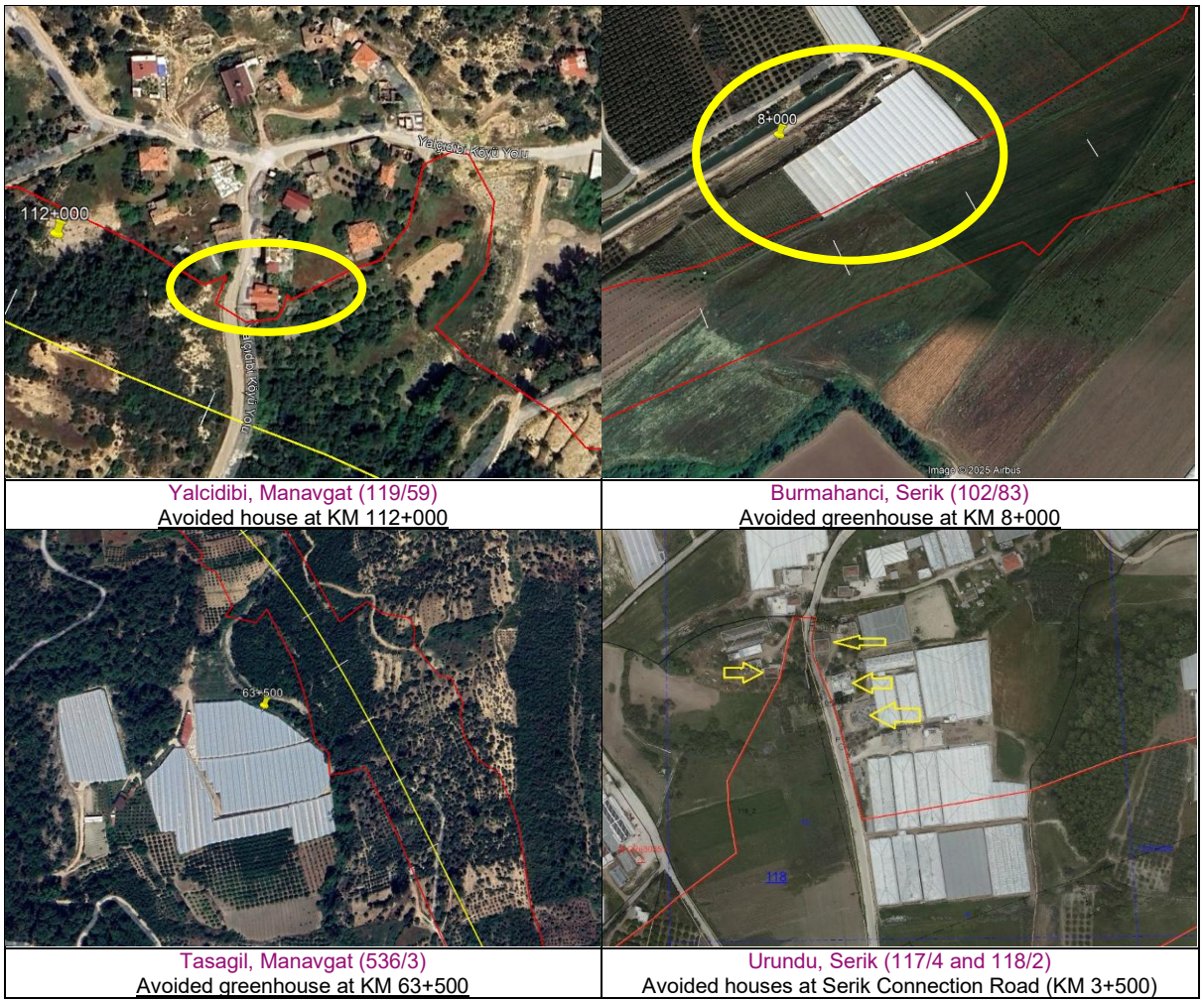
District	Section/ KM Chainage	Description of the Route Modifications (Justifications and/or Results)
Manavgat	112+500 – 125+000 (Alarahan crossing, T8 Tunnel, and Viaduct 19)	• The alignment in this section has been revised after BOT Contract. The revision intended to address and mitigate the following issues: - Adverse impact on agricultural land and greenhouses - Adverse impact on local livelihoods, leading to socio-economic opposition from the local population - Interchange design rendering a large portion of the plain unusable - Weak ground conditions and settlement issues pose challenges for construction and future maintenance/operation - Overlap with DSI irrigation projects - Overlap with the Manavgat–Seydisehir–Konya high-speed railway corridor - High expropriation costs - Inadequate ground conditions along the existing alignment for the T8 Tunnel
Manavgat	114+500 – 118+000 Alarahan Connection Road 	• In the Alarahan crossing, the tender alignment passed through the plain and weak soil. The alignment was shifted from north to the south-facing slopes, allowing it to traverse more stable ground. As a result, the plain and greenhouses were preserved for agricultural use, and expropriation costs were reduced. This adjustment has led to a more environmentally friendly design, particularly benefiting local residents affected by the previous impacts on farmland and greenhouse areas. • The arrangement of the Alarahan Interchange is intended to serve the historic Alarahan area. In designing the Alarahan Connection Road, the goal was to minimise impact on the agricultural lands located north of the Alara settlement, avoid weak soil conditions in the plains, and prevent the connection road from being squeezed between the slope and the settlement. As a result, the road was aligned closer to the southern slope, ensuring more efficient use of the area between Alara and the agricultural lands to the north. • The interchange design was also revised to cause minimal impact on the plain. The connection road was designed to cross the plain at its narrowest point and in a perpendicular direction, in order to minimise impact on the plain as much as possible.
Manavgat	118+500 – 122+500 (T8 Tunnel) 	• The tender alignment around KM 120+000 passes through weak ground at the T8 Tunnel, and therefore the excavation and support works alone were estimated to take around 4 years. In the Alarahan crossing, the alignment was shifted northward to gain elevation, allowing the route to pass through higher ground at the T8 crossing. As a result, at the T5 crossing, taking into account the protected sites in this area, the alignment was shifted northward again to enable a tunnel-free passage. This alternative to the tunnel did not result in any significant increase in the total route length. • In the continuation of the T8 section, the alignment runs along the slopes, eliminating the disadvantages similar to those encountered in the Alarahan plain crossing and resulting in a more favourable design in terms of expropriation costs.
Manavgat	123+000	• A retaining wall (on the right) at around KM 122+920 has been incorporated into the design to avoid impact on ETL pylons
Alanya	124+000 – 129+500	• The alignment proceeds by following the tender-phase corridor, specifically to avoid expropriation in the area where residences and greenhouses are located north of Akdam and Turkler settlements.
Alanya	132+500 (Konakli Interchange)	• Following the approval of the preliminary design at a 1/5,000 scale by KGM (in October 2024), a significant number of new developments have occurred along and around the alignment. Due to these new settlements, at around KM 132+500, the Konaklı Interchange area was shifted northward, thereby avoiding the buildings located near Branch-2.
Alanya	135+500	• The service area location has been relocated to chainage 135+500 due to technical considerations, resulting in overlaps with existing greenhouses. Technical assessments have concluded that the original design was unfeasible, as it would have required substantial excavation. This would have generated a high volume of excavated material, which could not be managed effectively due to storage space limitations in the vicinity.

Avoidance and Minimisation during Project Implementation

During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the following mechanisms:

- The 1/5,000 scale route for the Project has been approved by the KGM. In the next phases of the Project, Based on the geological investigations (e.g. boreholes, trial pits, laboratory testing, etc.) to be carried out, detailed implementation projects will be progressively prepared and approved – covering aspects such as alignment revisions (e.g. slope angles, elevations) and engineering structures (e.g. tunnels, viaducts, bridges, overpasses, underpasses, culverts) – before construction begins. During this process, multiple revisions are likely to occur on the 1/5,000-scale route. This dynamic process will allow revisions on the route and incorporation of measures to further avoid impacts on lands and structures (for example, avoiding a house through constructing a pile or a retaining wall, where technically feasible).
- Affected people will have the right to submit requests to KGM seeking the avoidance or minimisation of impacts on their assets (such as requesting acquisition of orphan lands, as outlined in Section 3.2.1.2). These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.
- The technical teams of the SPV and EPC Contractor will maintain engagement with affected people and, subject to KGM's approval, carry out micro-siting studies to explore and implement further opportunities for avoiding or minimising displacement impacts.

Figure 2-7 presents examples of avoidance achieved during the pre-construction phase, with structures kept outside the Motorway's expropriation corridor. As the Project advances, the dynamic nature of the 1/1,000-scale implementation plans and profiles similar avoidance strategies will continue to be duly considered, in line with the approach outlined above.



Yalcidibi, Manavgat (119/59)
Avoided house at KM 112+000

Burmahanci, Serik (102/83)
Avoided greenhouse at KM 8+000

Tasagil, Manavgat (536/3)
Avoided greenhouse at KM 63+500

Urundu, Serik (117/4 and 118/2)
Avoided houses at Serik Connection Road (KM 3+500)

Figure 2-7. Examples of Avoidance through Micro-siting of Expropriation Corridor Boundary

For assets located outside the expropriation corridor but considered sensitive receptors (e.g. houses potentially exposed to operational impacts such as noise or community health and safety risks):

- These impacts will be monitored internally by the SPV and externally by the Lenders' Independent Environmental and Social Consultant (IESC).
- EHS related requests and concerns will be evaluated by the SPV, in consultation with the owners and in alignment with Lenders' requirements, based on the findings of periodic E&S monitoring conducted by both the SPV E&S team and the IESC.

If land acquisition, expropriation, or resettlement is deemed necessary as a result:

- A **RAP Addendum** will be prepared and implemented by the SPV in coordination with KGM, and in line with the principles outlined in this RAP.
- The mechanism for such acquisition during the operation phase will be clarified by the SPV in agreement with KGM.
- All associated costs for acquisition and relocation will be covered under the RAP Fund, which will be allocated and managed by the SPV.

3. Project Impacts

The Project affects **privately-owned**, **state-owned** (**public parcels** including treasury, treasury – forestry, treasury – pasture, non-registered, etc.) and **legal entity parcels** (such as municipality, governmental institutions, public corporations, etc.) within Motorway's **expropriation corridor.**

There will be also other temporary construction facilities, such as construction camp sites, storage sites, plant sites (such as concrete plant, asphalt plant, mechanical plant, etc.) that will lead to impact on lands.

The key figures related to displacement impacts of the Project within the Motorway's expropriation corridor as per the current expropriation data are summarised below in Figure 3-1.

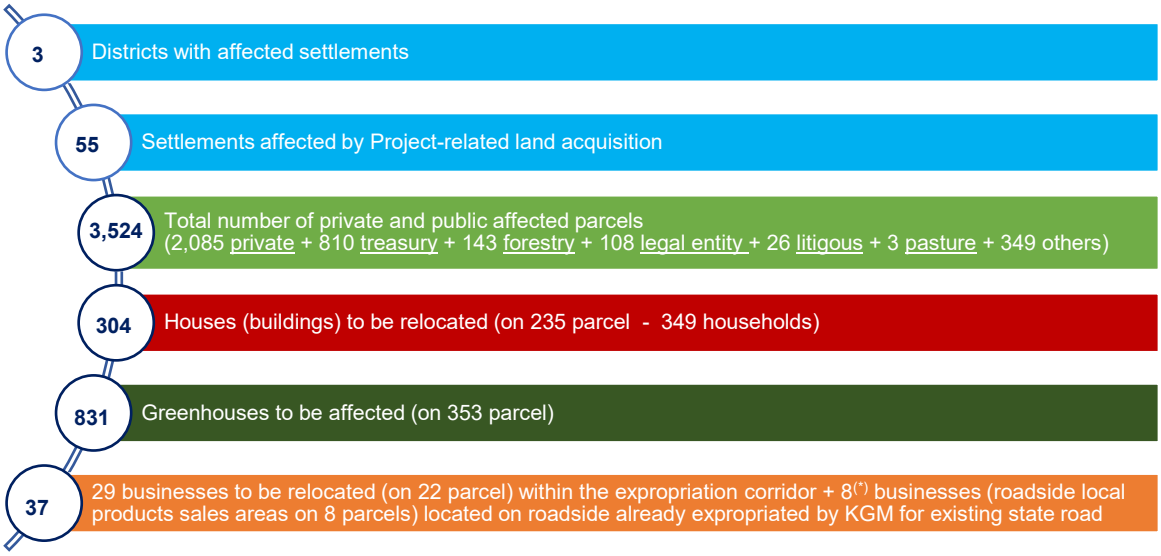


Figure 3-1. Summary of Key Data related to Land Acquisition and Project Displacement Impacts

(*) These 8 businesses were not included in the Project's expropriation plans and identified by the RAP Consultant Team during the field surveys conducted in May 2025. These businesses are small-scale, informal roadside vendors selling local products, and they are located on land parcels that were previously expropriated by KGM for the construction of the D-695 state road. As these parcels will not be re-expropriated under the current Project, the businesses are not reflected in the Expropriation Plans. However, they are considered eligible for support within the scope of the RAP.

It should be noted that some parcels within the Project area contain multiple affected structures. For example, a single large parcel may accommodate several houses or greenhouses. As a result, the number of parcels with affected houses or greenhouses differs from the actual number of affected houses or greenhouses.

Table 3-1 provides a summary of: (a) the number of parcels containing affected structures, and (b) the number of affected structures located on those parcels.

Table 3-1. Summary of Affected Structures

Structure	Private Parcels	Public Parcels					Total
		Treasury	Treasury - Forest	Treasury - Pasture	Non-registered	Other	
Number of Parcels with Affected Structures	**462**	**95**	**22**	**0**	**17**	**14**	**610**
Affected houses	175	44	10	0	4	2	**235**
Affected greenhouses	268	48	12	0	13	12	**353**
Affected business structures	19	3	0	0	0	8(*)	**30**
Number of Affected Structures	**933**	**130**	**42**	**0**	**39**	**28**	**1.172**
Affected houses	231	51	16	0	4	2	**304**
Affected greenhouses	676	76	26	0	35	18	**831**
Affected business structures	26	3	0	0	0	8(*)	**37**

(*) *These are the local product sales businesses located on land parcels that were previously expropriated by KGM for the construction of the D-695 state road.*

The method of land acquisition will involve permanent or temporary land take, as summarised below:

- Permanent land take: All land on which **Project components** within the designated expropriation corridor will be constructed – including the Motorway, interchanges, engineering structures, service facilities and O&M centre – will be subject to **permanent** land take.

  During the operation phase, access to lands within the expropriation corridor will be fully restricted for local communities and unauthorized third parties. Exceptions will apply to areas situated beneath viaducts and bridges. In accordance with KGM Technical Specifications, the entire Motorway alignment will be fenced to ensure the safety of vehicular traffic, pedestrians, and wildlife.

- Temporary land take: All land on which **temporary facilities** will be situated outside the Project's expropriation corridor – such as construction camp sites and various plants (e.g., beam production, asphalt, and mechanical plants), will be subject to **temporary** land take.

  These sites will be rehabilitated upon completion of construction activities – unless the KGM decides to retain their use during the operation phase. Following rehabilitation, the sites will be returned to the respective landowners.

Permanent or temporary land acquisition may lead to physical or economic displacement for users of the affected lands and structures. Based on an analysis of the expropriation plans (May 2025) prepared and issued by the engineering firm appointed by the SPV (with approval from KGM), along with the Project data, 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

(iii) Affected greenhouses

(iv) Affected businesses

(v) Impacts on vulnerable people

(vi) Temporary losses/impacts during construction[22], and

(vii) Impacts during operation

The impact on each category further varies depending on whether the land or structures are subject to full or partial expropriation.

Table 3-2 provides a summary of the potential displacement impacts, identifying the categories of Project Affected People (PAPs) associated with each type of impact. Detailed eligibility criteria and the Entitlement Matrix is included in the RAP.

[22] Construction activities result in temporary impacts on the owners and users of affected lands and assets. Health, safety and environmental risks and impacts of construction works (e.g. noise and air quality, health and safety risks on local people trespassing the construction corridor or due to Project traffic, impact on local roads, etc.) impacts are identified and assessed in Project's ESIA Report. During Project implementation, impacts will be monitored by the SPV and the EPC Contractor through site inspections, periodic E&S monitoring studies, and ongoing stakeholder engagement. Management of these impacts will be carried out via the Project-specific grievance mechanism. The EPC Contractor will implement E&S avoidance and mitigation measures during construction – such as dust suppression, minimisation of water use, and reduction of blasting impacts through optimised blasting design, among others – in accordance with the Project ESIA and the associated E&S management plans.

Table 3-2. Summary of Potential Impacts of Land Acquisition

Impact Category	Affected People Category
(i) Affected Lands	
Permanent loss of private parcels – agricultural parcels and constructible plots[23] (urban lands)	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Litigous properties ("*ihtilaflı bulunan mülkiyet*")	Litigant owners/shareholders of litigious properties
	Formal and informal users of litigious parcels
Orphan lands	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Permanent loss of state-owned treasury parcels (e.g. treasury, registered pasture lands, non-registered parcels) which are used for agriculture)	Owners
	Formal users with official documentation
	Informal users with no official documentation
Permanent loss of forest land	Users of forest lands
Permanent loss of treasury – pasture lands	Users of affected parcels for grazing
Restriction of access to grazing lands – located out of Project expropriation corridor (public or private) due to fragmentation	Users of grazing lands
Loss of crops	Owners of the crops (owner or formal/informal user of the land)
Loss of trees (fruit or non-fruit trees)	Owners of the trees (owner or formal/informal user of the land)
Loss of assets or infrastructure on affected private parcels (non-residential secondary structures, fences, barns, sheds)	Owners of non-residential structures and infrastructure who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures and infrastructure who are informal users of private lands (with no title deed but can prove their ownership of the structure)
	Owners of non-residential structures and infrastructure who are informal users of private lands (with no official documentation proving their ownership of the structure)
Loss of assets or infrastructure on affected public lands (non-residential/ secondary structures, fences, barns, sheds)	Owners of non-residential structures and infrastructure who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures and infrastructure who are informal users of state lands (with no official documentation for land use but can prove their ownership of the structure)
	Owners of non-residential structures and infrastructure on forestry and pasture lands or owners with no official documentation proving their ownership of the structure
Constitution of servitude (easement leading to loss of value of the immovable asset)	Owners of the parcels to be acquired through constitution of servitude (easement rights)
(ii) Affected Houses	
Loss of residential houses /structures	Owner of affected house
	Formal user (formal tenant)
	Informal users
(iii) Affected Greenhouses	
Greenhouse owners – that would relocate	Owner of greenhouse (owner or formal/informal user of the land)
	Employees of greenhouses (formal or informal)
Greenhouse owners – that terminate operations	Owner of greenhouse (owner or formal/informal user of the land)
	Employees of greenhouses (formal or informal)
	Owner of greenhouse (owner or formal/informal user of the land)

[23] Urban land that has been parcelled by municipalities within municipal boundaries is classified as a constructible plot (referred to as "*arsa*" in Turkish), in accordance with Article 12 of Türkiye's Real Estate Tax Law (Law No. 1319). For lands – whether within or outside municipal boundaries – that have **not** been parcelled, the designation as a constructible plot (*arsa* or urban land) is made through a Presidential Decree or other relevant legal instruments, as applicable.

Impact Category	Affected People Category
Greenhouse owners – that will not relocate but may experience partial loss of land/assets	Employees of greenhouses (formal or informal)
(iv) Affected Businesses	
Business owners – which would terminate operations (business shut-down)	
Business owners – that will not relocate but may experience partial loss of land/assets	Not a business owner at the affected business structure but the owner of the affected building
Business owners – which will be resettled permanently	Formal business owner – "owner" of the affected business structure
	Informal business owner – "owner" of the affected business structure
	Formal business owner – "tenant" of the affected business structure
	Informal business owner – "tenant" of the affected business structure
Business owners – which would terminate operations (business shut-down)	Same as above
Business owners – that will not be relocated but may experience partial loss of land/assets	Same as above
Employees	
Temporary income loss by the employees – due to (i) Being sent by the business owner to unpaid leave during business interruption period (ii) Delayed salary payment during business interruption period	Formal employees of affected businesses (incl. employees with vulnerabilities such as disabled and migrant)
	Informal employees of affected businesses including employees with vulnerabilities such as disabled and migrant)
Permanent income loss by the employees – due to (i) Permanent business shut-down; (ii) Dismissal/ termination of employment contract by the business owners; or (iii) Resignation by the employees as the business relocates to a remote location	Formal and informal employees including vulnerable workers and women
(v) Vulnerable People	
Affected households with vulnerable members – may be exposed to any type of loss/impact given for the above PAP Categories with a more significant level of impact due to vulnerability or disadvantaged conditions	All physically and economically displaced households with vulnerable members
	Physically displaced households with vulnerable members (under any vulnerability category)
	Economic: • Green card[24] holder • People receiving governmental aid • Unemployed • Employed without Social Security
	Gender-based: • Female head of HH without an economically active adult man in the household • Female head of HH with an economically active adult man in the household Based on age: • Advance Old Age (over 75) • Elderly people (over 65) in need of care • Children household head (under 18) Sickness, physical or mental disability: • Chronic disease • Other significant health issues (heart, diabetes, Alzheimer, high blood, kidney failure, etc.) • Physical disability • Mental disability

[24] Health card provided as per the national Regulation on the State Coverage of Healthcare Expenses for Citizens who Cannot Afford to Pay and the Green Card System (type and content of the card is determined as per the Regulation).

Impact Category	Affected People Category
	Households with children: • Children with special needs • Unschooled children at school • Ethnic minority, belonging to other religions
	Based on literacy: Illiterate persons
	Migrant
	Households who do not own any agricultural land (landless)
	Cumulative impacts: Households whose income is land based and disproportionately affected due to cumulative impacts on their lands
	HH resettled in the neighbourhood after earthquake or other disasters
Vulnerable employees	• Informal employees (Employees who are not registered by their Business owner at the workplace under the Social Insurance and Universal Health Insurance Law (No. 5510) of Turkey). • Migrant employees (formal and informal) • Physically disabled / handicapped employee • Chronically ill employee • Elderly workers (over 65) in need of care • Women employees with vulnerabilities (e.g. single women with children, etc.) • Employees with vulnerable household members (e.g. disabled) • No children (15-18 ages) were reported to be employed at the affected businesses
(vi) Temporary Losses/Impacts During Construction	
Temporary loss of private parcels during construction (including access restrictions)	Owners/shareholders
	Formal users (formal tenants)
	Informal users
Temporary loss of state-owned parcels during construction (including access restrictions)	Owners (Governmental institutions)
	Formal users (formal tenants)
	Informal users
Non-land related livelihood losses due to construction (e.g. dust, excavation, traffic, blasting, etc.) that may lead to impact on lands, livestock, other properties, crops, quality and quantity of surface or groundwater resources, etc.)	Owners and formal/informal users of lands and assets – as applicable
Temporary interruption/disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any
(vii) Impacts During Operation	
Operation phase E&S impacts (e.g. operation phase noise, vibration, air quality, community health and safety)	Owners and/or formal/informal users of residential structures/houses for which impacts cannot be mitigated to levels compliant with Project standards through operation phase ESMMP

Table 3-3. Method of Land Take for Permanent and Temporary Project Facilities (as of May 2025)

Location	ID	Main Facility Name	App. Motorway KM	Number of Parcels subject to Land Take (according to expropriation plans)	Parcel No.	Parcel Type (according to expropriation plans)	Ownership (according to expropriation plans)	Method for Land Take (please see Section 2.8 for the current expropriation status)
Expropriation Corridor								
Motorway (incl. Connection Roads, Interchanges, Engineering Structures listed in Section 2.3 – tunnels, viaducts, bridges, overpasses, underpasses and culverts – MSFs, and displaced infrastructure which are located within the Expropriation Corridor)			Full alignment	3,524	Indicated in the expropriation plans of the Project	- Agricultural (2,526 parcels) - Forest (143 parcels) - Orchard (98 parcels) - Constructible plot (100 parcels) - Pasture (3 parcels) - Lands with structures[25] (71) - Others (583 parcels)	- Private (2,085 parcels) - Legal entity (108 parcels) - Treasury (810 parcels) - Treasury – forest (136 parcels) - Non-registered – forest (7 parcels) - Treasury – pasture (3 parcels) - Non-registered (335 parcels) - Litigous (26 parcels) - Co-owned by private and state (14 parcels)	**Permanent** – Expropriation by KGM (please see Section 2.8 for the current expropriation status)
Overhead Transmission Line Displacement Works (referring to existing OHTLs that need to be relocated due to their overlap with the Motorway alignment)			Planning studies are ongoing, the number of parcels affected will be identified in due course.	To be identified	To be identified	To be identified	To be identified	**Permanent for tower pylon locations –** Expropriation of tower pylon locations by KGM in coordination with Turkish Electricity Transmission Company (TEIAS) (permanent land take only – no easement) **Easement Rights** – For OHTL Alignment (easement only– no permanent land take)
Construction Camp Sites								
Tasagil (Temporary)	1	Temporary Construction Camp Site	59+500	1	644/1	Forest	- Treasury	**Temporary** – Allocation to the Project through forestry permit
Tasagil (Main)	2	Main Construction Camp Site	64+500	7	653/1, 663/1	Forest	- Treasury	**Permanent** – Expropriation by KGM (since the site will serve as O&M Centre during operation phase)
					515/413	Agricultural	- Litigious	
					515/535, 515/414, 515/415, 515/44	Currently road, formerly agricultural land	- Private	
Manavgat	3	Manavgat Construction Camp Site	87+500	1	241/1	Forest	- Treasury	**Temporary** – Allocation to the Project through forestry permit
Alanya	4	Alanya Construction Camp Site	124+300	1	Non-registered	Non-registered - Forest	- State	**Temporary** – Allocation to the Project through forestry permit
Excavated Material Storage Areas (Dump Sites)								
Serik, Manavgat and Alanya		There are 21 potential excavated materials storage sites that are under consideration by the Project.	Outside the Motorway's expropriation corridor	22	Please see Table 2-11 for the list of parcels	Forest	- Treasury or non-registered	**Permanent** – Allocation to the Project through forestry permit
				17	Please see Table 2-11 for the list of parcels	Agricultural	Private or state – Ownership information is currently not available and will identified by the KGM/SPV once the site is confirmed for use	**Permanent** – Expropriation by KGM in case of private or Allocation to the Project in case of state
Quarries								
Quarries		There are 10 potential quarries that are under consideration by the Project.	Outside the Motorway's expropriation corridor	11	Please see Table 2-15 for the list of parcels	Forest	- Treasury or non-registered (Table 2-15)	**Temporary** – Allocation to the Project through forestry permit
				34	Please see Table 2-15 for the list of parcels	Agricultural	- Private or state (Table 2-15)	**Temporary** – Expropriation by KGM in case of private or Allocation to the Project in case of state
				1		Winter pasture (*kislak*)	- State	**Temporary** – Allocation to the Project
Plants (Concrete plants, asphalt plants, mechanical plants, crushers, beam[26] production facilities)								
Serik, Manavgat and Alanya		There are 8 plant sites that are under consideration by the Project.	Outside the Motorway's expropriation corridor	6	Please see Table 2-14 for the list of parcels	Forest	- Treasury or non-registered	**Temporary** – Allocation to the Project through forestry permit
				4	Please see Table 2-14 for the list of parcels	Road *(formerly agricultural land)*	- Private or state (Table 2-14)	**Temporary** – Expropriation by KGM in case of private or Allocation to the Project in case of state

[25] This is one category as defined in the expropriation plans. Other listed categories may also include structures; therefore, this figure does not represent the total number of parcels or lands containing structures.

[26] Planning for the Beam Production Plants is ongoing as of May 2025. The relevant information will be incorporated into the table once the details are finalised.

3.1. Affected Settlements

Table 3-4. Affected Neighbourhoods per Expropriation Area and Number of Affected Parcels

No.	Road	District	Neighbourhood	Expropriation Area			Number of Affected Parcels							
				Title Deed Area (m2)	Expropriation Area (m2)	Ranking by Largest Expropriation Area	Privately-owned parcels		State-owned (Public) Parcels		Co-owned by Private & State	Parcels owned by legal entities	Total Affected Parcels	Ranking by Largest Number of Affected Parcels
							Private Parcels	Litigious	Treasury Parcels	Non-registered Parcels				
1	Serik Connection Road	Serik	Deniztepesi	879,503.80	63,764.60	**-**								
	Serik Main Road	Serik	Deniztepesi	555,881.43	176,956.50	**-**								
			Deniztepesi Total	**1,435,385.23**	**240,721.10**	**24**	16	--	1	6	--	2	**25**	
2	Serik Main Road	Serik	Sarıabalı	8,411,557.67	398,816.95	**-**								
	Serik Connection Road	Serik	Sarıabalı	243,235.00	42,730.78	**-**								
			Sarıabalı Total	**8,654,792.67**	**441,547.73**	**13**	9	--	110	14	--	3	**136**	**8**
3	Serik Connection Road	Serik	Üründü	1,642,200.42	472,226.81	**11**	61	--	1	10	--	1	**73**	
4	Serik Connection Road	Serik	Belpınar	93,552.05	16,578.52	**51**	3	--	--	2	--		**5**	
5	Serik Connection Road	Serik	Burmahancı	709,935.48	283,225.80	**21**	67	--	6	7	--	7	**87**	
6	Serik Connection Road	Serik	Cumalı	658,544.55	209,522.21	**27**	58	--	--	7	--	--	**65**	
7	Serik Connection Road	Serik	Aşağıçatma	282,538.94	70,383.78	**47**	14	--	--	1	--	2	**17**	
8	Serik D-400 Main Road	Serik	Çandır	217,778.08	12,060.31	**52**	18	--	--	2	--	2	**22**	
9	Serik D-400 Main Road	Serik	Kayaburnu	104,440.23	5,832.35	**53**	3	--	--	--	--	--	**3**	
10	Serik D-400 Main Road	Serik	A.Kocayatak	2,180.92	1,165.56	**55**	1	--	--	--	--	--	**1**	
11	Serik D-400 Main Road	Serik	Y.Kocayatak	25,790.00	19,048.03	**50**	1	1	--	4	--	1	**7**	
12	Manavgat Main Road 56-75	Manavgat	Çakış	8,533,440.23	106,987.75	**43**	30	--	9	2	1	--	**42**	
13	Manavgat Main Road 56-75	Manavgat	Taşağıl	17,318,831.29	1,058,080.23	**-**								
	Tasagil Connection Road	Manavgat	Taşağıl	2,234,294.53	604,615.64	**-**								
			Taşağıl Total	**19,553,125.82**	**1,662,695.87**	**1**	**148**	**3**	**27**	**21**	**5**	**13**	**217**	**2**
14	Manavgat Main Road 56-75	Manavgat	Hocalar	8,292,684.47	606,308.67	**-**								
	Tasagil Connection Road	Manavgat	Hocalar	7,184,169.95	156,905.87	**-**								
			Hocalar Total	**15,476,854.42**	**763,214.54**	**2**	114	1	13	9	--	--	**137**	**7**
15	Manavgat Main Road 56-75	Manavgat	Gündoğdu	138,789.96	65,721.85	**48**	7	--	7	--	--	--	**14**	
16	Manavgat Main Road 56-75	Manavgat	Yavrudoğan	1,107,375.05	236,074.71	**25**	26	--	26	7	1	2	**62**	
17	Manavgat Main Road 56-75	Manavgat	Çolaklı	1,114,438.21	195,286.28	**30**	10	--	33	5	--	--	**48**	
18	Manavgat Main Road 74-84	Manavgat	Seki	10,011,689.54	247,754.17	**23**	36	--	14	6	--	1	**57**	
19	Manavgat Main Road 74-84	Manavgat	Kalemler	9,236,617.28	270,686.81	**-**								
	Manavgat Connection Road	Manavgat	Kalemler	790,979.41	301,358.63	**-**								
			Kalemler Total	**10,027,596.69**	**572,045.44**	**6**	100	--	57	14	--	19	**190**	**3**
20	Manavgat Main Road 74-84	Manavgat	Yeniköy	7,650,973.57	207,267.70	**28**	9	--	5	2	--		**16**	
21	Manavgat Main Road 74-83	Manavgat	Şişeler	417,694.29	181,493.94	**33**	32	--	5	5	--	4	**46**	
22	Manavgat Main Road 74-84	Manavgat	Evrenleryavşi	535,269.48	168,382.93	**34**	32	--	4	5	--	2	**43**	
23	Manavgat Main Road 74-84	Manavgat	Dolbazlar	3,025.30	1,299.95	**54**	--	--	2	--	--	--	**2**	
24	Manavgat Main Road 83-93	Manavgat	Yukarıışıklar	13,424,962.51	**318,339.66**	**18**	54	--	3	6	--	5	**68**	
25	Manavgat Main Road 83-94	Manavgat	Dikmen	1,260,098.86	**102,266.31**	**44**	21	--	11	1	--	--	**33**	
26	Manavgat Main Road 83-94	Manavgat	Bucakşeyhler	12,065,304.63	206,187.74	**29**	22	--	12	7	1	1	**43**	
27	Manavgat Main Road 83-94	Manavgat	Ulukapı	1,495,735.71	139,038.80	**40**	8	--	11	5	--	1	**25**	
28	Manavgat Main Road 83-94	Manavgat	Aşağıışıklar	1,105,649.07	397,765.70	**14**	30	2	47	10	--	4	**93**	
29	Manavgat Main Road 93-105	Manavgat	Demirciler	2,285,812.43	71,110.55	**46**	2	--	2	--	--	--	**4**	
30	Manavgat Main Road 93-105	Manavgat	Karaöz	2,155,567.00	159,266.84	**37**	23	--	5	1	--	1	**30**	
31	Manavgat Main Road 93-104	Manavgat	Aksaz	306,874.35	112,037.23	**42**	19	2	5	2	--	--	**28**	
32	Manavgat Main Road 93-105	Manavgat	Hacıali	3,983,717.22	156,427.07	**38**	9	--	22	--	--	2	**33**	
33	Manavgat Main Road 93-105	Manavgat	Cevizler	1,247,888.94	142,725.05	**39**	16	--	8	3	--	3	**30**	
34	Manavgat Main Road 93-105	Manavgat	Hacıisali	659,787.66	323,010.27	**17**	42	3	36	5	--	1	**87**	
35	Manavgat Main Road 93-104	Manavgat	Sülek	1,591,115.06	182,627.68	**32**	--	--	2	--	--	--	**2**	

No.	Road	District	Neighbourhood	Expropriation Area			Number of Affected Parcels							
				Title Deed Area (m2)	Expropriation Area (m2)	Ranking by Largest Expropriation Area	Privately-owned parcels		State-owned (Public) Parcels		Co-owned by Private & State	Parcels owned by legal entities	Total Affected Parcels	Ranking by Largest Number of Affected Parcels
							Private Parcels	Litigious	Treasury Parcels	Non-registered Parcels				
36	Manavgat Main Road 93-104	Manavgat	Hacıobası	3,186,332.54	328,752.70	**-**								
	Manavgat East Connection Road	Manavgat	Hacıobası	3,927,672.32	397,535.53	**-**								
			Hacıobası Total	**7,114,004.86**	**726,288.23**	**3**	72	--	19	8	3	2	**104**	
37	Manavgat Main Road 104-116	Manavgat	Uzunlar	793,869.73	272,383.97	**22**	54	--	42	10	--	1	**107**	**10**
38	Manavgat Main Road 104-117	Manavgat	Kadılar	961,544.19	305,630.24	**19**	44	--	8	10	--	--	**62**	
39	Manavgat Main Road 104-116	Manavgat	Örenşehir	1,807,853.38	167,146.78	**35**	16	--	6	1	--	--	**23**	
40	Manavgat Main Road 104-116	Manavgat	Yalçıdibi	1,125,660.43	465,782.68	**12**	90	--	31	7	--	--	**128**	**9**
41	Manavgat Main Road 104-116	Manavgat	Odaönü	134,897.00	95,951.99	**45**	17	--	4	1	--	--	**22**	
42	Manavgat Main Road 104-116	Manavgat	Karakaya	517,413.48	214,425.50	**26**	78	--	8	8	--	--	**94**	
43	Manavgat Connection Road	Manavgat	Evren	1,262,716.43	512,116.27	**8**	67	1	9	12		7	**96**	
44	Manavgat Connection Road	Manavgat	Ilıca	125,079.60	36,291.20	**49**	14	--	3	4	--	5	**26**	
45	Alanya Main Road 116-129	Alanya	Alara	1,312,572.47	511,555.08	**9**	79	8	236	26	--	3	**352**	**1**
46	Alanya Main Road 116-129	Alanya	Çakallar	554,303.49	296,014.81	**20**	122	--	1	12	--	4	**139**	**6**
47	Alanya Main Road 116-129	Alanya	Akdam	476,701.44	382,511.91	**15**	85	--	10	10	--	--	**105**	
48	Alanya Main Road 116-129	Alanya	Avsallar	14,085.84	615,296.92	**5**	3	--		2	--	--	**5**	
49	Alanya Main Road 116-129	Alanya	İncekum	4,055,199.35	192,267.45	**31**	5	--	4	2	--	--	**11**	
50	Alanya Main Road 128-136	Alanya	Türkler	26,847.29	480,051.97	**10**	6	--	10	--	1	--	**17**	
51	Alanya Main Road 128-137	Alanya	Payallar	1,677,810.01	162,338.97	**36**	1	--	3				**4**	
52	Alanya Main Road 128-137	Alanya	Emişbeleni	1,450,047.86	478,261.42	**-**								
	Konakli Connection Road	Alanya	Emişbeleni	3,613,950.17	185,683.93	**-**								
			Emişbeleni Total	**5,063,998.03**	**663,945.35**	**4**	100	2	29	21	1	1	**154**	**5**
53	Alanya Main Road 136-141	Alanya	Toslak	1,354,991.65	549,865.67	**7**	115	--	28	17	1	7	**168**	**4**
54	Alanya Main Road 136-141	Alanya	Elikesik	293,656.49	114,922.74	**41**	25		10	8			**43**	
55	Alanya Main Road 139-142	Alanya	Telatiye	741,126.48	339,126.91	**16**	51	3	4	14		1	**73**	
Total				**159,394,256.21**	**15,595,254.87**		**2,085**	**26**	**949**	**342**	**14**	**108**	**3,524**	

3.2. Potential Displacement Impacts

3.2.1. Affected Lands (within Expropriation Corridor)

3.2.1.1. Affected Parcels per **Ownership and Land Registry Type**

The parcels overlapping with the Motorway's expropriation corridor are categorised based on their ownership type as follows:

- Privately-owned parcels
- State-owned (public) parcels
- Parcels owned by legal entities ("*tuzel kisilik*" in Turkish)

Total area and number of parcels **per ownership category** is presented in Table 3-5.

Table 3-5. Total Area and Number of Parcels per Ownership

Ownership	Total Expropriation Area		Number of Parcels	
	Area (m^2)	Ratio (%)	Number	Ratio (%)
Privately-owned	**7,777,271.86**	**49.9**	**2,085**	**59.2**
State-owned	**7,467,144.33**	**47.9**	**1,291**	**36.6**
- Treasury	1,302,505.63	8.4	810	23.0
- Treasury – Forestry	4,621,025.44	29.6	136	3.9
- Non-registered – Forestry	753,139.12	4.8	7	0.2
- Treasury – Pasture	1,778.30	0.0	3	0.1
- Non-registered (creek, park, road)	660,460.92	4.2	307	8.7
- Non-registered (others)	128,234.92	0.8	28	0.8
Legal Entity	**180,358.54**	**1.2**	**108**	**3.1**
Litigous	**129,990.61**	**0.8**	**26**	**0.7**
Co-owned by Private & State	**42,267.83**	**0.3**	**14**	**0.4**
Total	**15,595,254.87**	**100.00%**	**3,524**	**100.00%**

Source: SPV, April 2025. Expropriation Plans.

Total area and number of parcels **per land registry type** is presented in Table 3-6.

Table 3-6. Total Area and Number of Parcels per Land Registry Type

Land Registry Type	Total Expropriation Area		Number of Parcels	
	Area (m^2)	Ratio (%)	Number	Ratio (%)
Agricultural (*tarla*)	8,408,307.18	53.9	2,526	71.7
Road *(yol)*	454,612.53	2.9	239	6.8
Forest (*orman*)	5,374,164.56	34.5	143	4.1
Orchard *(bahçe ve zeytinlik)*	290,790.12	1.9	98	2.8
Constructible plot (*arsa*)	93,768.31	0.6	100	2.8
Raw soil *(ham toprak)*	144,599.51	0.9	81	2.3
Creek *(dere)*	215,289.21	1.4	71	2.0
Land with structure *(üzerinde yapı olan arazi)*	148,208.60	1.0	71	2.0
Litigous *(davalı)*	128,407.98	0.8	21	0.6
Pasture (*mera*)	1,778.30	0.0	3	0.1
Park *(park)*	7,684.10	0.0	7	0.2
Other[27] *(diğer)*	327,644.47	2.1	164	4.7
Total	**15,595,254.87**	**100.00%**	**3,524**	**100.00%**

Source: SPV, April 2025. Expropriation Plans.

[27] The "others" category broadly encompasses features such as graveyards, channels, brushland, and other miscellaneous land uses not classified under the primary categories.

3.2.1.1.1. Private Owners

According to the list of owners and shareholders (May 2025), among the 2,085 private parcels:

- Approximately 45% of the affected private parcels have single owners (around 1,000), each possessing the full ownership of respective parcel.
- The remaining parcels are characterised by a multi-shareholder ownership structure. The total number of shareholders is estimated to be around 11,000 (including joint ownership – *elibirligi* cases).

These figures are intended to provide a general overview and may be subject to change upon the completion of inheritance procedures by the affected individuals. It is worthwhile to note that figure of 11,000 shareholders should not be interpreted as a reliable indicator of the total number of project-affected individuals. As confirmed by owner lists from the KGM, **this number includes individuals who are not residing in the Project area**, and in some cases, are located in other cities or abroad. Many of these shareholders do not maintain any economic connection with the land does will not be physically or economically affected by the Project. Nevertheless, they will receive cash compensation from KGM in accordance with the Expropriation Law, in proportion to the shares they own in the land.

More than 300 privately owned parcels are held by over 10 shareholders each. Selected examples with notably high shareholder counts are presented below. This is largely attributed to unresolved or ongoing inheritance issues.

- Parcel No. 121/36 in Telatiye, Alanya: 81 shareholders
- Parcel No. 135/9 in Telatiye, Alanya: 142 shareholders

Heir Identification by KGM

As a standard practice, KGM's regional directorate identifies deceased persons and their legal heirs through the Central Civil Registration System (MERNIS) and sends Article 8 notifications to invite them to participate in negotiations.

As part of RAP implementation, the SPV will individually contact the settlement heads and the identified heirs in each settlement, informing them about the support available through the RAP Fund. This includes the allowance provided under the Small Costs Fund to facilitate the completion of inheritance and succession procedures.

If the heirs' phone numbers cannot be accessed by KGM and the SPV due to legal restrictions on personal data protection, individual communication may not be possible. In such cases, KGM and the SPV rely on the heirs to initiate contact using the details provided in the official Article 8 letters (sent with return receipt requested) that are delivered to all heirs.

The SPV will follow up on the status of succession processes through direct communication with the settlement heads and heirs, to the extent possible.

For the sections where Article 8 invitations have been sent or prepared, the number of deceased persons identified is as given in Table 3-7. This list will be updated by KGM as new heirs are identified through the ongoing Article 8 invitation process.

Table 3-7. Number of Deceased Persons

Chainge	Length	Number of Parcels	Number of Owners	Number of Deceased among the Owners	Percentage (%)
KM 83+000 – 93+000	10 km	127	1,903	52	2.7
KM 93+000 – 104+000	11 km	133	1,696	43	2.5

Facilitation of Inheritance Procedures by Actions to be taken by KGM

The SPV is engaging with both the General Directorate and the 13th Regional Directorate of the General Directorate of Highways (KGM) to establish a mechanism that facilitates the resolution of ongoing inheritance-related issues – particularly the expropriation of immovable properties that have not yet been transferred through inheritance.

These efforts are being carried out pursuant to Article 3, subparagraph (c)[28] of Circular No. 2024/3 on Expropriation Procedures, issued by the General Directorate of Land Registry and Cadastre.

The consultations focus on two suggestions proposed by the SPV, as outlined below. It is important to note that the decision-making process by the General Directorate is still ongoing, and the implementation of these suggestions remains contingent upon KGM's formal approval.

1) Revision of Article 8 notifications:

The Article 8 notifications include a list of documents that must be brought when attending the negotiations. The SPV has suggested KGM to revise the relevant item under the list of documents as follows:

"*A document obtained from the relevant tax office showing that the inheritance and transfer tax has been paid for the deceased owner and other heirs who passed away afterward (Certificate of Discharge for Inheritance and Transfer Tax)*[29]".

2) Revision of Article 8 Agreement Protocols:

The SPV has suggested KGM to revise the relevant part of the Article 8 agreement protocols, as follows:

"*We hereby acknowledge and accept the registration of the expropriation process in the land registry pursuant to Article 8 of the Expropriation Law No. 2942, along with all legal liabilities that may arise as a result of the inheritance transfer and subdivision of the immovable property specified above*[30]"

With the inclusion of this declaration, the inheritance procedures shall be completed by the KGM during the title deed registration stage, and no separate inheritance-related transaction shall be required on the part of the affected property owner in order to reach an agreement with KGM or to access the expropriation compensation to be paid by KGM following title deed registration.

[28] "**c) Expropriation of Immovable Properties Not Yet Transferred Through Inheritance:** In cases where an immovable property registered under the name of a deceased person (the decedent) or registered collectively under the names of heirs as joint ownership, is to be expropriated in whole or in part, it is not mandatory for all co-owners to simultaneously transfer their shares (*ferağ*). If the immovable property is still registered under the name of the deceased, and a declaration indicating the request and consent for the inheritance transfer and for the conversion of joint ownership is included in the agreement protocol, then the property shall be transferred as joint ownership. The share of the heir who signs the agreement protocol shall be removed from the joint ownership group and registered in the name of the Administration through expropriation. The shares of the heirs who do not sign the agreement protocol shall be registered as joint ownership, excluding the share of the signing heir. The Administration must attach to the agreement protocol the original or a notarized copy of the certificate of inheritance of the deceased, as well as documentation showing that the inheritance and transfer tax has been settled. In the declaration section of the **agreement protocol**, the following statement must be included: "Negotiations were held on …/…/… between the administration and … (whose identity details are provided above), taking into account the legal and physical characteristics of the above-described immovable property/properties and independent unit(s) as of the date of expropriation. As a result of these negotiations, the parties have reached a mutual agreement to sell/exchange the aforementioned property(ies) at the value(s) stated above through negotiation and settlement. Pursuant to Article 8 of Expropriation Law No. 2942, we accept the registration and annotation of the expropriation transaction in the land registry."

[29] *In Turkish: "Malik murise ve ondan sonra vefat eden diğer mirasçılara ait, ilgili vergi dairesinden alınan veraset ve intikal vergisinin ödendiğini gösterir belge (Veraset ve İntikal Vergi İlişiği Kesme Belgesi).*

[30] In Turkish: "*Yukarıda belirtilen taşınmazın intikal ve ifrazı sonucu doğacak hukuki sorumlulukları ve 2942 sayılı Kamulaştırma Kanunu'nun 8. Maddesi gereğince kamulaştırma işleminin tapu siciline tescilini kabul ediyoruz.*"

3.2.1.1.2. Legal Entities

The legal entities that own parcels within the Motorway's expropriation corridor, as identified in the Expropriation Plans, are listed in Table 3-8.

Table 3-8. Legal Entities with Parcels within the Motorway Expropriation Corridor

Municipalities	Others
• Antalya Metropolitan Municipality • Antalya Metropolitan Municipality - Directorate General of Antalya Water and Sewerage Administration (ASAT) • Alanya District Municipality • Manavgat District Municipality	• General Directorate of Highways (KGM) • Manavgat Organized Industrial Zone (Manavgat OSB) • Ministry of Environment, Urbanization and Climate Change - Housing Development Administration of Turkey (TOKI) • Ministry of Agriculture and Forestry, General Directorate of State Hydraulic Works • Kepez and Antalya Region Electricity Power Plants Inc. (Kepez ve Antalya Havalisi Elektrik Santralleri T.A.Ş) • Kepez Electricity Joint Stock Company • Toslak Village Nurdağı Foundation • Türkiye Religious Affairs Foundation (*Türkiye Diyanet Vakfı*) • Turkish Electricity Transmission Corporation (TEIAS) • Ulugüney Village Course and School Students Association (Alara)

Source: SPV, April 2025. Expropriation Plans.

3.2.1.1.3. State-owned – Forestry

Parcels registered as forestry are mostly located in Manavgat and Alanya districts, as listed in Table 3-9.

The potential use of forest areas by local communities for economic purposes, if any, have been consulted with the settlement heads as part of the RAP field surveys, as discussed in Section 5.2.

The structures built on forest parcels are separately identified in Section 3.2.2.

Table 3-9. Settlements with Affected Forest Parcels

District	Neighbourhood	Affected Forest Parcels			
		Number of Parcels	Total Affected Forest Parcel Area (m2)	Affected Forest Area (m2)	% Affected Area
Serik	Sarıabalı	2	8,046,222.14	167,334.04	2.1
Manavgat	Çakış	1	8,317,914.70	48,479.55	0.6
	Taşağıl	10	17,728,155.10	837,816.13	4.7
	Hocalar	3	14,066,356.26	295,373.55	2.1
	Gündoğdu	1	13,882.74	3,999.83	28.8
	Yavrudoğan	7	662,113.73	64,894.58	9.8
	Çolaklı	6	800,774.29	119,036.64	14.9
	Seki	8	9,847,490.01	169,950.56	1.7
	Kalemler	1	8,842,337.24	69,438.29	0.8
	Evren	1	8,517.68	2,193.12	25.7
	Yeniköy	4	7,489,710.91	148,564.91	2.0
	Şişeler	2	55,761.44	10,243.57	18.4
	Dolbazlar	1	**Non-registered parcel**	1,186.52	-
	Yukarıışıklar	1	12,772,012.60	36,181.56	0.3
	Dikmen	1	999,217.00	27,394.21	2.7
	Bucakşeyhler	2	11,757,694.76	136,062.50	1.2
	Ulukapı	1	1,346,651.72	63,053.62	4.7
	Aşağıışıklar	8	292,934.72	102,362.18	34.9
	Demirciler	2	2,251,812.90	67,726.78	3.0
	Karaöz	2	1,726,079.99	49,274.88	2.9
	Aksaz	4	119,715.20	19,256.08	16.1
	Hacıali	5	3,350,911.23	46,749.43	1.4
	Cevizler	1	997,102.66	43,210.28	4.3
	Sülek	1	1,584,345.04	177,904.42	11.2
	Hacıisali	1	435,189.47	145,763.40	33.5
	Hacıobası	5	5,891,727.57	353,165.95	6.0
	Uzunlar	1	241,815.43	20,488.72	8.5
	Kadılar	4	457,403.30	77,691.49	17.0
	Örenşehir	3	1,558,324.98	65,097.94	4.2
	Yalçıdibi	4	289,210.13	116,236.68	40.2
	Odaönü	4	69,258.56	51,518.15	74.4
	Karakaya	1	56,343.31	5,738.62	10.2
Alanya	Alara	1	476,996.94	5,299.23	1.1
	Avsallar	2	**Non-registered parcel**	607,829.49	-
	İncekum	3	3,972,537.07	172,201.74	4.3
	Akdam	8	**Non-registered parcel**	155,652.88	-
	Türkler	9	**Non-registered parcel**	475,653.67	-
	Payallar	1	1,654,529.07	155,311.71	9.4
	Emişbeleni	6	4,104,093.07	93,344.16	2.3
	Toslak	8	673,984.43	145,123.14	21.5
	Elikesik	4	78,885.48	17,694.36	22.4
	Telatiye	3	18,338.00	2,666.00	14.5
Total		**143**	**133,073,990.74**	**5,374,164.56**	

Source: SPV, April 2025. Expropriation Plans.

3.2.1.1.4. State-owned – Pasture

Parcels registered as pasture are located **only in the Uzunlar neighbourhood** of the Manavgat district, as listed in Table 3-10.

Figure 3-2 presents a satellite image of the parcels registered as pasture. A preliminary review of this image suggests that these parcels may not be actively used for grazing purposes. During the RAP surveys of May 2025, the settlement head confirmed that there is no pastureland affected by the Project.

Table 3-10. Pasture Parcels within the Motorway Expropriation Corridor

No	District	Neighbourhood	Motorway KM	Lot/ Parcel No.	Ownership	Title Deed Area (m^2)	Expropriation Area	
							m^2	Ratio
1	Manavgat	Uzunlar	106+705.99	101/34	Common property	423.17	423.17	100%
2			106+741.39	101/35	Common property	1,239.43	1,239.43	100%
3			106+771.52	101/36	Common property	618.88	115.7	18.7%
Total						**2,281.48**	**1,778.3**	

Source: SPV, April 2025. Expropriation Plans.



Figure 3-2. Parcels registered as Pasture and affected by the Project in Uzunlar neighbourhood

3.2.1.2. Orphan Lands

Some parcels are partially expropriated as required in accordance with the Expropriation Law of Türkiye.

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "*orphan land (also referred to as "severed" or "unviable") is land that is not directly located within the project's direct footprint but becomes uneconomic as a result of land acquisition and should be acquired and compensated for as a result. There are guidelines in the legislation of many countries with regard to orphan land. In general, such land should be compensated in full. In terms of process, affected persons should be informed that orphan land can be eligible for compensation under certain conditions, and in such situations they should be able to lodge a specific claim for review by the project or the relevant agency. The project will generally benefit from establishing and disclosing clear criteria for eligibility of orphan land to acquisition and compensation*."

The distribution of private parcels by remaining area after expropriation is provided in Table 3-11.

Table 3-11. Distribution of Private Parcels by Remaining Area After Expropriation

Remaining Area after Expropriation (m^2)	Number of parcels	Ratio (%)
0	614	29.4
1 – 100	10	1.42
101 – 200	14	2.37
201 – 500	56	4.30
501 – 750	90	2.84
751 –1,000	58	9.32
1,001 – 2,000	193	17.65
2,001 – 5,000	365	13.43
5,001 – 10,000	282	19.06
>10,001	403	19.3
Total	**2,085**	**100.0**

The expropriation boundary for the Project has been established with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size[31] or its unsuitable geometry – the boundary has been revised to encompass the entire parcel.

In this Project, **for parcels with greenhouses,** the parcel is expropriated fully if the r**emaining area is less than 400 m²** as identified during the resettlement-scoping phase consultations with experts from the KGM Department of Immovables held on 28 – 30 April 2025.

During the RAP field surveys, mukhtars and households engaged in agriculture, particularly greenhouse cultivation, indicated that a remaining parcel size of 500 m² would be considered viable for continuing their agricultural production activities.

The list of orphan private lands that are below 500 m^2 (over 1 m^2) is provided in Table 3-12. The legal provisions regulating the acquisition of orphan lands, pursuant to the Expropriation Law and subject to an application by the landowner, are outlined in Appendix B.1.

The entitlements associated with different categories of orphan land are detailed in RAP – Entitlement Matrix. 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.

The settlements affected by the Motorway's land acquisition and that fall within 1/1,000-scale zoning plan implementation areas are discussed in Section 2.9. According to Article 13 of the BOT Contract, necessary upper and lower scale zoning plan and zoning plan amendments will be made by the SPV according to the approved Project. Consequently, orphaned portions of agricultural or constructible (urban) plots – i.e., the remaining parts of expropriated parcels – located within the 1/1,000 zoning plan implementation area will be addressed through the zoning plan implementation, which will be carried out by the respective municipalities.

[31] It should be noted that there is no formally defined threshold for this in KGM's procedures. However, in practice, orphaned agricultural lands smaller than 100 m² and orphaned urban lands smaller than 200 m² are commonly evaluated and may be deemed unviable, particularly if the landowner submits a request for the acquisition of the remaining portion.

Table 3-12. List of Orphan Private Lands with an Area less than 500 m²

District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m²)	Expropriated Area (m²)	Remaining Area (m²)
Serik	1	Burmahancı	102	129	Agricultural	275.33	65.86	209.47
	2	Burmahancı	102	131	Agricultural	509.11	292.41	216.70
	3	Burmahancı	102	132	Agricultural	476.06	180.79	295.27
	4	Burmahancı	102	1327	Agricultural	195.58	72.85	122.73
	5	Burmahancı	102	1329	Agricultural	481.16	117.83	363.33
	6	Cumalı	236	3	Constructible plot	467.71	300.2	167.51
	7	Sarıabalı	116	1	Agricultural	1,501.38	1,211.54	289.84
	8	Üründü	138	12	Agricultural	1,409.13	1,120.08	289.05
	9	Üründü	138	27	Agricultural	533.38	103.33	430.05
Manavgat	10	Çakış	128	158	Agricultural	582.58	401.99	180.59
	11	Çakış	128	159	Agricultural	447.31	297.24	150.07
	12	Çakış	128	160	Agricultural	983.30	652.16	331.14
	13	Çakış	128	161	Agricultural	434.68	285.49	149.19
	14	Çakış	128	162	Agricultural	411.02	236.88	174.14
	15	Çakış	128	163	Agricultural	772.84	394.44	378.40
	16	Çakış	128	164	Agricultural	345.80	120.12	225.68
	17	Çakış	128	171	Agricultural	1767.73	1410.09	357.64
	18	Çakış	150	7	Agricultural	1937.75	1550.77	386.98
	19	Taşağıl	346	3788	Agricultural	798.48	602.79	195.69
	20	Hocalar	158	778	Agricultural	14,127.42	13,675.16	452.26
	21	Hocalar	185	765	Agricultural	994.46	623.72	370.74
	22	Hocalar	212	735	Agricultural	978.61	539.54	439.07
	23	Hocalar	212	735	Agricultural	978.61	539.54	439.07
	24	Ilıca		807	Agricultural	880.00	833.89	46.11
	25	Kadılar	130	1	Agricultural	733.74	252.93	480.81
	26	Kalemler	122	5	Constructible plot	1,312.33	860.08	452.25
	27	Kalemler	122	1	Agricultural	2,633.10	2,309.81	323.29
	28	Kalemler	122	18	Constructible plot	422.18	96.08	326.10
	29	Kalemler	122	20	Constructible plot	281.14	134.75	146.39
	30	Kalemler	175	1	Constructible plot	467.01	237.90	229.11
	31	Kalemler	115	8	Agricultural	531.59	294.96	236.63
	32	Seki	219	1	Constructible plot	584.09	148.00	436.09
	33	Seki	220	2	Constructible plot	575.84	142.68	433.16
	34	Seki	821	6	Agricultural	922.00	571.63	350.37
	35	Şişeler	107	354	Agricultural	1,196.19	765.65	430.54
	36	Taşağıl	346	3788	Agricultural	798.48	602.79	195.69
	37	Taşağıl	910	2	Constructible plot	926.00	532.12	393.88
	38	Taşağıl	920	7	Constructible plot	1,056.90	632.86	424.04
	39	Taşağıl	311	14	Constructible plot	491.26	420.44	70.82
	40	Uzunlar	197	2	Agricultural	739.68	274.35	465.33
	41	Uzunlar	218	1	Agricultural	258.84	86.39	172.45
	42	Uzunlar	101	33	Agricultural	1,412.30	1,034.76	377.54
	43	Yalçıdibi	119	59	Land with structure	376.42	138.67	237.75
	44	Yalçıdibi	119	58	Garden	601.74	112.23	489.51
	45	Yalçıdibi	119	91	Agricultural	841.69	571.81	269.88
Alanya	46	Akdam	104	241	Agricultural	493.01	225.15	267.86
	47	Akdam	157	55	Agricultural	409.77	93.44	316.33
	48	Akdam	106	39	Agricultural	106.99	2.10	104.89
	49	Alara	133	24	Agricultural	424.47	76.46	348.01
	50	Alara	133	10	Agricultural	1,043.08	758.94	284.14
	51	Alara	133	1	Agricultural	526.94	250.27	276.67

District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m^2)	Expropriated Area (m^2)	Remaining Area (m^2)
	52	Alara	156	32	Agricultural	2,051.68	2,049.30	2.38
	53	Alara	160	1	Agricultural	900.11	491.73	408.38
	54	Avsallar	496	1	Agricultural	2,331.76	1,839.56	492.20
	55	Çakallar	121	25	Agricultural	1,375.00	1,373.66	1.34
	56	Çakallar	133	1	Agricultural	7,180.00	6,745.79	434.21
	57	Çakallar	133	3	Agricultural	221.00	88.29	132.71
	58	Çakallar	134	10	Agricultural	1,296.00	990.93	305.07
	59	Çakallar	134	11	Agricultural	724.00	323.06	400.94
	60	Çakallar	133	2	Agricultural	2,099.00	1,745.41	353.59
	61	Çakallar	134	16	Agricultural	1,882.00	1,855.50	26.50
	62	Çakallar	134	22	Agricultural	90.00	17.90	72.10
	63	Çakallar	134	23	Agricultural	741.00	305.02	435.98
	64	Çakallar	134	24	Agricultural	695.00	271.67	423.33
	65	Çakallar	134	25	Agricultural	735.00	296.41	438.59
	66	Çakallar	134	27	Agricultural	864.00	447.03	416.97
	67	Çakallar	136	5	Agricultural	1,000.00	821.31	178.69
	68	Elikesik	173	49	Agricultural	356.55	85.80	270.75
	69	Elikesik	166	90	Agricultural	325.93	296.59	29.34
	70	Emişbeleni	217	4	Agricultural	1,839.44	1,341.78	497.66
	71	Telatiye	127	8	Agricultural	3,497.39	3,472.11	25.28
	72	Telatiye	360	3	Constructible plot	1,148.80	811.91	336.89
	73	Toslak	247	42	Agricultural	168.89	65.98	102.91
	74	Toslak	251	1	Agricultural	3,845.86	3,772.13	73.73
	75	Toslak	251	4	Agricultural	735.76	307.56	428.20
	76	Toslak	251	20	Agricultural	244.68	34.45	210.23
	77	Toslak	251	26	Agricultural	463.87	293.09	170.78
	78	Toslak	251	28	Agricultural	1,341.68	934.00	407.68
	79	Toslak	299	15	Agricultural	1,211.23	764.73	446.50
	80	Türkler	239	16	Agricultural	440.32	437.72	2.60



Tasagil, Manavgat
(311/14 – constructible plot with remaining area of 71 m^2)

Cakis, Manavgat
(128/160 – greenhouse with remaining area of 150 m^2)

Figure 3-3. Examples of Orphan Parcels

List of orphan lands on treasury parcels is provided in Appendix C.

The road map for management of orphan lands based on execution status of the 1/1,000 scale implementation zoning plan is as follows:

1) Executed ("*Uygulama Gormus*") – Parcels with Deducted Development Readjustment Share

- Right to Apply for Remaining Parcel Acquisition:

  For unacquired portions not previously included in the expropriation, owners/shareholders have the right to submit an official application to KGM to request acquisition of the remaining, unusable portion of the expropriated parcel. As per the Expropriation Law, KGM reviews such applications in line with its criteria for unviable land acquisition of agricultural orphan lands.

- Legal Remedy and Support by SPV:

  Not all applications may be accepted; in such cases, landowners/shareholders retain the right to pursue court proceedings. The SPV will inform affected persons of their legal rights as outlined in the RAP through distribution of the Guide to Land Acquisition and Compensation (GLAC) and during ongoing consultations. Assistance will also be provided for official applications and other relevant procedures.

- Revisions to Zoning Plans for Large Infrastructure Projects:

  Even if parcels have undergone adjustment under Article 18 of the Zoning Law ("*uygulama görmüş*"), the zoning plan amendment process may allow evaluation of orphan parcels within revised zoning plans, with potentially for enabling allocation of replacement lands or shares to affected owners/shareholders in certain cases. Such cases will be monitored under the RAP, and each issue will be managed individually in consultation with the Lenders and their Independent Environmental and Social Consultant (IESC) (see Chapter 12 on Monitoring and Reporting).

2) Not Executed ("*Uygulama Gormemis*") – Parcels Awaiting Deduction of Development Readjustment Share

- Zoning Plan Execution Pending:

  Orphaned parts of the parcels will be evaluated by the relevant authority (e.g., municipalities) as part of future zoning plan execution aligned with the procedures and reduction ratios specified in Article 18 of the Zoning Law (No. 3194, 1985). The execution process will be monitored by the SPV to track implementation.

- Right to Apply to KGM:

  In parallel, landowners/shareholders retain the right to apply to KGM for acquisition of the remaining portion of the expropriated parcel. KGM will consider these applications under the Expropriation Law as it relates to agricultural orphan lands. Again, if an application is rejected, legal recourse is available to the applicant.

During Project implementation, the SPV will implement the SEP, including the grievance mechanism, and will maintain ongoing engagement with the affected people, including users of orphan parcels. Economic displacement impacts arising from such orphan lands will be monitored by the SPV throughout RAP implementation, and any related grievances or losses will be managed on a claim basis or proactively where concluded to be necessary. This approach will be operationalised through the Project's grievance mechanism and implementation of livelihood restoration and assistance measures as set out in this RAP.

3.2.1.3. Fragmented Parcels

As a result of expropriation, some parcels become fragmented into two or more sections, with the Motorway crossing between them. The leftover sections of fragmented parcels may also be considered orphan lands, as described in Section 3.2.1.2.

Engineering structures that provide access between fragmented parcel sections are essential to avoid or minimize access difficulties. Such difficulties could result in increased costs and time requirements for agricultural production by users of the fragmented agricultural parcels.

The list of underpasses, overpasses, and culverts incorporated into the Project design to ensure agricultural users' access to their lands is provided in Appendix A. The number, distribution, and adequacy of these structures in ensuring that residents can access the opposite side of the road have been evaluated as part of the ongoing RAP studies.

Table 3-13 presents the list of fragmented parcels, including information on the nearest crossing structures and their respective distances from the fragmented parcels.

During Project implementation, the SPV will implement the SEP, including the grievance mechanism, and will maintain ongoing engagement with the affected people, including users of fragmented parcels.

Any feedback and/or requests received from affected people regarding land fragmentation, engineering structures, or related matters will be reviewed by the Project's design and construction teams and KGM on a claim basis. Where necessary and feasible, and subject to KGM's approval, **the SPV may incorporate additional structures into the design during the construction phase.**



Yavrudoğan, Manavgat (134/50– agricultural land with left side remaining area of 370.53 m^2)	Yukarıışıklar, Manavgat (119/49– agricultural land with olive with right side remaining area of 940.97 m^2)

Figure 3-4. Examples of Fragmented Parcels

Table 3-13. List of Fragmented Lands*

District	No	Settlement	Motorway KM	Motorway Section	Lot	Parcel	Parcel Type	Ownership Type	Parcel Area (m^2)	Total Expropriated Area (m^2)	Remaining Area (m^2)		Nearest Crossing Structure	Approximate Distance to the Structure (m)
											Right	Left		
Serik	1	Sarıabalı	55+411.05	Main Road	116	10	Land with structure	Treasury	6,320.03	4,595.35	1,437.96	286.72	Viaduct No-1	50.0
	2	Üründü	3+844.67	Serik Connection	135	4	Agricultural	Private	23,982.64	11,753.91	338.24	11,890.49	Culvert No-210	350.0
	3	Üründü	4+040.32	Serik Connection	135	2	Agricultural	Private	36,556.41	20,949.38	15,013.41	593.62	Culvert No-213	0
	4	Burmahancı	8+826.34	Serik Connection	113	73	Agricultural	Private	13,314.54	6,789.60	5,696.37	828.57	Bridge No-12	150.0
	5	Cumalı	9+568.85	Serik Connection	202	96	Agricultural	Private	4,437.30	1,297.18	455.39	2,684.73	Culvert No-230	75.0
Manavgat	6	Hocalar	66+665.93	Main Road	158	758	Agricultural	Private	6,839.84	2,301.01	866.68	3,561.09	Underpass No-9	350.0
	7	Hocalar	67+425.58	Main Road	185	50	Agricultural	Private	16,538.91	5,985.49	10,553.46	369.18	Overpass No-1	350.0
	8	Yavrudoğan	71+799.15	Main Road	134	49	Agricultural	Private	4,764.12	2,313.48	2,124.00	326.64	Culvert No -46	380.0
	9	Yavrudoğan	71+779.58	Main Road	134	50	Agricultural	Private	4,535.09	1,882.86	2,281.70	370.53	Culvert No -46	400.0
	10	Yavrudoğan	71+728.67	Main Road	134	57	Agricultural	Private	4,790.25	1,750.84	2,095.73	943.68	Culvert No -46	450.0
	11	Yavrudoğan	71+696.14	Main Road	134	59	Agricultural	Private	11,298.61	4,052.94	6,290.06	955.49	Culvert No -46	485.0
	12	Yavrudoğan	71+661.44	Main Road	134	1453	Agricultural	Treasury	5,672.78	1,703.88	3,212.34	756.36	Culvert No -46	520.0
	13	Yavrudoğan	72+241.79	Main Road	138	55	Agricultural	Treasury	7,577.39	4,738.58	2,541.53	297.28	Culvert No -46	60.0
	14	Yavrudoğan	71+622.74	Main Road	268	97	Agricultural	Treasury	6,065.46	2,734.30	2,863.61	467.55	Viaduct No-3	500.0
	15	Yukarıışıklar	83+323.27	Main Road	119	49	Agricultural	Private	13,682.05	8,837.91	940.97	3,903.17	Overpass No-10	280.0
	16	Yukarıışıklar	84+412.58	Main Road	159	8	Agricultural	Private	14,339.66	8,222.51	892.64	5,224.51	Underpass No-15	300.0
	17	Dikmen	85+510.74	Main Road	121	11	Agricultural	Private	14,190.54	5,844.87	678.15	7,667.52	Viaduct No-5	200.0.
	18	Bucakşeyhler	85+784.55	Main Road	210	10	Agricultural	Private	6,831.24	4,316.39	311.37	2,203.48	Viaduct No-5	475.0
	19	Bucakşeyhler	86+503.94	Main Road	128	5	Agricultural	Private	35,084.41	1,103.06	33,030.56	950.79	Viaduct No-6	120.0
	20	Bucakşeyhler	86+629.36	Main Road	128	4	Agricultural	Private	20,456.56	7,781.31	11,709.69	965.56	Viaduct No-6	245.0
	21	Bucakşeyhler	87+296.82	Main Road	205	3	Agricultural	Private	11,013.03	2,846.73	7,401.86	764.44	Overpass No-14	215.0
	22	Aşağıışıklar	91+291.05	Main Road	121	29	Agricultural	Private	24,613.44	9,150.08	14,736.35	727.01	Overpass No-16	215.0
	23	Aşağıışıklar		Main Road	148	12	Agricultural	Treasury	9,056.66	6,427.76	829.26	1,814.73	Overpass No-16	226.0
	24	Demirciler	93+093.22	Main Road	119	1	Agricultural	Private	13,352.84	2,937.29	10,060.62	354.93	Overpass No-18	0
	25	Demirciler	93+090.57	Main Road	119	2	Forest	Treasury	1,764.86	1,149.64	255.82	359.40	Overpass No-18	0
	26	Karaöz	94+444.33	Main Road	117	1	Agricultural	Private	5,549.50	2,117.68	559.63	677.09	Viaduct No-9	130.0
	27	Aksaz	95+591.84	Main Road	108	10	Agricultural	Private	33,692.79	11,413.20	8,783.86	760.62	Overpass No-21	140.0
	28	Hacıali	96+407.11	Main Road	235	20	Agricultural	Treasury	15,299.38	6,537.89	610.68	10,057.85	Viaduct No-10	200.0
	29	Uzunlar	104+412.89	Main Road	183	11	Agricultural	Private	8,343.38	4,445.44	479.53	3,418.41	Viaduct No-14	315.0
	30	Uzunlar	105+993.44	Main Road	211	2	Agricultural	Private	10,139.89	6,133.78	452.71	3,553.40	Underpass No-18	135.0

District	No	Settlement	Motorway KM	Motorway Section	Lot	Parcel	Parcel Type	Ownership Type	Parcel Area (m^2)	Total Expropriated Area (m^2)	Remaining Area (m^2)		Nearest Crossing Structure	Approximate Distance to the Structure (m)
											Right	Left		
	31	Yalçıdibi	112+361.17	Main Road	119	124	Raw soil	Treasury	2,932.19	1,879.07	658.08	395.04	Underpass No-24	230.0
	32	Taşağıl	0+512.35	Tasagil Connection	515	76	Agricultural	Private	10,680.03	6,509.24	3,262.34	908.45	Overpass No-50	340.0
	33	Evren	4+623.14	Manavgat Connection	760	5	Agricultural	Private	6,547.46	1,845.99	4,339.90	429.43	Overpass No-55	70.0
	34	Evren	4+679.85	Manavgat Connection	760	8	Agricultural	Private	6,486.80	1,375.09	4,587.60	524.11	Overpass No-55	125.0
	35	Evren	4+705.98	Manavgat Connection	760	10	Agricultural	Private	6,459.46	1,543.78	4,085.79	829.89	Overpass No-55	150.0
	36	Evren	6+241.38	Manavgat Connection	764	16	Agricultural	Private	7,848.42	5,835.48	898.75	1,114.19	Culvert No-269	0
	37	Evren	6+625.88	Manavgat Connection	764	35	Agricultural	Private	13,218.79	7,248.83	938.14	5,031.82	Culvert No-269	0
Alanya	38	Alara	1+565.89	Alarahan Connection	131	1	Agricultural	Private	3,266.47	1,492.09	1,551.54	222.84	Culvert No-295	320.0
	39	Alara	1+586.44	Alarahan Connection	131	15	Agricultural	Private	3,699.60	1,540.71	1,970.14	188.75	Culvert No-295	300.0
	40	Alara	2+209.38	Alarahan Connection	156	50	Agricultural	Treasury	6,692.20	4,288.00	84.72	2,319.48	Culvert No-295	325.0
	41	Akdam	125+215.91	Main Road	104	298	Agricultural	Private	8,027.08	6,391.95	1,053.85	581.28	Underpass No-34	550.0
	42	Emişbeleni	135+356.94	Main Road	142	1	Agricultural	Treasury	29,736.92	8,682.63	20,172.51	881.78	Culvert No-184	30.0
	43	Emişbeleni	1+200.00	Konakli Connection	218	3	Agricultural	Private	3,829.81	1,655.78	1,630.17	543.86	Culvert No-308	100.0

*Parcels fragmented in such a way that at least one adjacent side (right or left) is under 1000 m² have been taken into consideration.

3.2.1.4. Affected Trees

Fruit and non-fruit trees are present on parts of the affected parcels, including those that are privately owned and state-owned. The expropriation plans include a complete list of affected trees for each affected parcel where identification is complete. The list of trees considered in the valuation is also recorded in the valuation reports prepared for each affected parcel and noted in the purchase agreement protocols signed by the affected persons who reach an agreement with KGM on the expropriation price.

In the affected settlements, **commercial orchards** (*kapama bahce*) of **orange, lemon, olive, pomegranade** are common. The fruit types are cultivated either under cover (in greenhouses) or in open fields.

The underlying rationale for commercial orchards is that the owner has established the orchard with the **intention of generating income**. In contrast, planting a variety of fruit trees around a residence is typically intended for household consumption rather than commercial purposes.

In general practice, orchards over an area of at least 1,000 m^2 (1 da) are considered commercial. In these orchards;

- All trees are typically of the same species (single fruit species) and age
- They are planted with specific planting spacing (density) and alignment
- Modern agricultural practices are applied, typically including irrigation, pruning, and maintenance

Commercial orchards are cultivated either **under cover** (in greenhouses) or in **open fields**. They are labeled as "*kapama*" in certain sections of the Expropriation Plans. However, in some areas, this designation is not explicitly provided. In such cases, it is possible to identify commercial orchards by reviewing supplementary information including in the plans – such as the number and age of trees – alongside corresponding satellite imagery.

Appendix H provides a list of parcels containing orchards located within the Motorway's expropriation corridor.

Fruit types identified as commercial orchards along the route include the following:

- Vineyards (grapes)
- Citrus (mainly oranges)
- Pomegranate
- Apricot
- Olive
- Banana (under cover)
- Avocado (open field), and
- Dragon fruit (under cover)

Some co-owners in large, jointly owned parcels had established single-species commercial orchards on the portions allocated to them (based on internal arrangements). In some instances, two different commercial orchards were found on the same parcel.

The valuation and compensation method followed by KGM in the Project, in accordance with the Expropriation Law of Türkiye, is outlined in RAP Section 6.3.



Bucakseyhler (205/18 and 205/3) Orange orchard partially affected by Viaduct Construction (87+465) – full area approximately 7 da	Ulukapi (167/3) Orange orchard partially affected by Route (88+500) – full area approximately 7.5 da

Figure 3-5. Sample Affected Orchards – Open Field

Open-field Commercial Orchards

Table 3-14 summarises the number of trees and parcels for commercial orchards cultivated in **open fields.**

Table 3-14. Number of Trees and Parcels for Commercial Orchards in Open Field

Orchard Type	Number Trees	Total Number of Parcels containing Orchards	Parcel Ownership Type					Number of Trees on a Single Parcel	
			Treasury	Private	Non-registered	Legal Entity	Litigious	Minimum	Maximum
Vinyards (grapes)	25,685	4	2	2	0	0	0	145	25,000
Olive	10,300	98	29	68	0	0	1	3	395
Citrus	8,647	83	31	51	0	1	0	4	785
Pomegranate	2,263	18	7	11	0	0	0	6	338
Avocado	1,944	14	1	12	1	0	0	13	518
Apricot	1,226	3	1	2	0	0	0	55	896
Total – open field	**50,065**	**220**[32]	**71**	**146**	**1**	**1**	**1**		

Source: SPV, April 2025. Expropriation Plans.

[32] Some co-owners in large, jointly owned parcels had established single-species commercial orchards on the portions allocated to them (based on internal arrangements). On **7 parcels**, two different commercial orchards were found on the same parcel. Accordingly, the number of distinct parcels containing open-field commercial orchards is Accordingly, the number of distinct parcels containing open-field commercial orchards is **213.**

The commercial open-field orchards established on **treasury lands** are located in the following settlements[33]:

- Serik:
    - Sarıabali (41 parcels)
- Manavgat:
    - Kalemler (8 parcels)
    - Aşağıışıklar (6 parcels)
    - Yavrudoğan (3 parcels)
    - Hocalar (2 parcels)
    - Gündoğdu (2 parcels)
    - Evren (2 parcels)
    - Çolaklı (1 parcel),
    - Karaöz (1 parcel)
    - Dikmen (1 parcel)
    - Bucakşeyhler (1 parcel)
    - Aksaz (1 parcel)
    - Hacıisalı (1 parcel)

There is a single commercial open-field orchard established on **non-registered lands:**

- Alanya, Emisbeleni (1 parcel)

Commercial Orchards under Cover (in Greenhouses)

Table 3-14 summarises the number of samplings and parcels for commercial orchards cultivated **under cover (in greenhouses).**

Table 3-15. Number of Saplings and Parcels for Commercial Orchards under Cover (in Greenhouses)

Orchard Type	Number Saplings	Total Number of Parcels containing Orchards	Parcel Ownership Type					Number of Samplings on a Single Parcel	
			Treasury	Private	Non-registered	Legal Entity	Litigious	Minimum	Maximum
Banana	18,672	27	2	25	0	0	0	13	2,768
Dragon fruit	6,785	3	0	3	0	0	0	435	5,350
Total – under cover	**25,457**	**30**	**2**	**28**	**0**	**0**	**0**	**-**	**-**

Source: SPV, April 2025. Expropriation Plans.

These commercial greenhouse orchards are located in the following settlements, predominantly on private lands, with the exception of two treasury parcels in Toslak, Alanya (both banana orchards):

- Manavgat: Şişeler, Evrenleryavşi, Yukarışıklar, Aşağıışıklar, KAraöz, Hacıobası, Uzunlar, Taşağıl, Hacıobası,
- Alanya: Emişbeleni and Toslak

[33] The total number of Treasury-owned parcels with commercial orchards is 70. This number is different than the number of treasury parcels given in Table 3-14 (71 parcels) as one of these parcels contains two distinct commercial orchards.

3.2.1.5. Informal and Formal Users of Affected Lands

The identification of formal and informal users of the affected lands has commenced as part of the RAP studies, as summarised below.

April 2025 Surveys by Third-party Implementation Partner

In April 2025, the SPV engaged a third-party implementation partner to identify the users of the parcels located within the Motorway's expropriation corridor, through field surveys and interviews conducted with settlement heads.

The user identification survey consisted of a desk-based review of the expropriation lists and a field surveys. During site visits, the teams collected user information and contact details based on previously compiled data and through consultations with mukhtars and/or residents present in the affected settlements[34] at the time of the survey.

During the surveys, the team received information on 2,387 of the affected parcels (when parcels with no potential for economic use such as canals, roads are excluded) and identified the following to date:

- The owners using the land for economic activity: 505 private parcels
- The owner and the user are different individuals and the user uses the land for economic activity: 274 private parcels

The formal status of land users is being further assessed as part of the ongoing RAP studies based on the sampling methodology outlined in Chapter 4.

May 2025 Surveys by RAP Consultant Team

In May 2025, a comprehensive RAP field programme has been completed as part of the RAP studies. During the surveys, the survey team has identified the individuals within the sample, including their personal information and their current socio-economic conditions key to RAP.

The field surveys identified 270 distinct land users on 414 parcels, accordingly **1.5 user per parcel** (Table 3-16). As discussed in Section 3.2.1, the Project has affected a total of 2,767 parcels, registered as agricultural land (2,526), orchards (143), and forests (98), all of which have potential for economic use by PAPs. Accordingly, the number of land users is estimated to be approximately **4,150**.

Table 3-16. Number of Land Users within the RAP Survey Sample

Parcel Type	Number of Parcel	Number of Land Users (Formal and Informal)
Parcels under sole ownership	81	81
Parcels under co-ownership	119	233
Parcels containing affected houses	70	100
Total	**270**	**414**

During the RAP process, the development of a **Project Affected People (PAP) Database for Land Acquisition** was initiated. This database incorporates information on owners and shareholders identified by the KGM (through national engineering firm/valuation contractor) through the census and asset inventory process, as well as formal and informal users of affected lands, structures (such as houses, business premises, and greenhouses), and trees, identified by the RAP Consultant Team and the Project CLOs during the RAP field surveys in May 2025. The database also includes contact information and information on any identified vulnerabilities among affected people.

The **PAP Database** is designed as a **living document** and will be **regularly updated by the SPV** throughout RAP implementation to reflect any newly identified users or changes in circumstances.

[34] The surveys did not include Cakallar and Akdam neighbourhoods as the engineering firm assigned to prepare the expropriation plans has not yet conducted identification studies in these settlements yet due to community hesitance. The engagement between the SPV and the community is ongoing for the planning of future studies.

3.2.2. Affected Structures

The structures affected by the Project include the following main categories, as listed in Table 3-17.

- Affected Houses
- Affected Greenhouses
- Affected Business Structures
- Affected Non-residential Structures

Table 3-17. Number of Parcels Containing Affected Structures per Settlement: Affected Houses, Greenhouses and Business Structures

No	District	Neighborhood	Number of Parcels with Affected Houses								Number of Parcels with Affected Greenhouses (GHs)								Number of Parcels with Affected Business Structures (BSs)							
			Private Parcels		Public Parcels			Co-owned by Private & State	Legal Entities	Total Parcel with Houses	Private Parcels		Public Parcels			Co-owned by Private & State	Legal Entities	Total Parcel with GHs	Private Parcels		Public Parcels			Co-owned by Private & State	Legal Entities	Total Parcel with BSs (*)
			Private	Litigious	Treasury	Non-registered (NR)	Forest (Treasury or NR)				Private	Litigious	Treasury	Non-registered (NR)	Forest (Treasury or NR)				Private	Litigious	Treasury	Non-registered (NR)	Forest (Treasury or NR)			
1.	Serik	Deniztepesi	2							**2**	4						1	**5**								-
2.	Serik	Sarıabalı			13		1			**14**	1		12					**13**								-
3.	Serik	Üründü	9							**9**	11							**11**								-
4.	Serik	Belpınarı								-	1							**1**								-
5.	Serik	Burmahancı	1							**1**	2		1					**3**								-
6.	Serik	Cumalı	1							**1**	3							**3**	1							**1**
7.	Serik	Aşağıçatma	4							**4**	3							**3**	4							**4**
8.	Serik	Çandır								-								-								-
9.	Serik	Kayaburnu								-								-								-
10.	Serik	Aşağıkocayatak								-								-								-
11.	Serik	Yukarıkocayatak								-								-								-
12.	Manavgat	Çakış	6		1					**7**	3							**3**								-
13.	Manavgat	Taşağıl	8		3	1	2	1		**15**	3		3	1	1	1	2	**11**			1					**1**
14.	Manavgat	Hocalar	1							**1**	1							**1**								-
15.	Manavgat	Gündoğdu								-								-								-
16.	Manavgat	Yavrudoğan	1		1					**2**	1							**1**								-
17.	Manavgat	Çolaklı			3					**3**								-								-
18.	Manavgat	Seki	4		1		1			**6**	1							**1**								-
19.	Manavgat	Kalemler	5							**5**	9		2					**11**								-
20.	Manavgat	Evren	1							**1**	4		1					**5**	4							**4**
21.	Manavgat	Ilıca	1							**1**								-								-
22.	Manavgat	Yeniköy								-								-								-
23.	Manavgat	Şişeler			1	1				**2**	2							**2**								-
24.	Manavgat	Evrenleryahşi								-	1							**1**								-
25.	Manavgat	Dolbazlar								-								-								-
26.	Manavgat	Yukarıışıklar	13							**13**	12							**12**								-
27.	Manavgat	Dikmen	1							**1**	1							**1**								-
28.	Manavgat	Bucakşeyhler	2		1					**3**								-								-
29.	Manavgat	Ulukapı								-	1		1					**2**								-
30.	Manavgat	Aşağıışıklar	1		1					**2**	2							**2**								-
31.	Manavgat	Demirciler								-								-								-
32.	Manavgat	Karaöz								-	1					1		**2**								-
33.	Manavgat	Aksaz								-		2						**2**								-
34.	Manavgat	Hacıali								-								-								-
35.	Manavgat	Cevizler	1							**1**								-								-
36.	Manavgat	Sülek								-								-								-
37.	Manavgat	Hacıisali								-	1							**1**								-
38.	Manavgat	Hacıobası	10		2					**12**	7		1					**8**	2							**2**
39.	Manavgat	Uzunlar	1		3					**4**	5		2					**7**								-
40.	Manavgat	Kadılar	1							**1**	1							**1**								-
41.	Manavgat	Örenşehir	2							**2**	4		2					**6**								-
42.	Manavgat	Yalçıdibi								-	2		1		1			**4**								-
43.	Manavgat	Odaönü								-								-								-
44.	Manavgat	Karakaya	12							**12**	20							**20**								-
45.	Alanya	Alara	7		7	1			1	**16**	11		3	1				**15**								-
46.	Alanya	Çakallar	11		1					**12**	12							**12**								-
47.	Alanya	Avsallar	1				1			**2**								-								-
48.	Alanya	İncekum								-								-								-
49.	Alanya	Akdam	12							**12**	28							**28**								-
50.	Alanya	Türkler					2			**2**	1				1			**2**								-
51.	Alanya	Payallar								-			1		1			**2**								-
52.	Alanya	Emişbeleni	12		2					**14**	39		5	6	2		1	**53**	2		1					**3**
53.	Alanya	Toslak	16		4		3			**23**	35		9		3		2	**49**			1					**1**
54.	Alanya	Elikesik	9							**9**	7		3	1	1			**12**								-
55.	Alanya	Telatiye	19			1				**20**	28	3	1	4	1			**37**	6							**6**
Total Number of Parcels			**175**	**0**	**44**	**4**	**10**	**1**	**1**	**235**	**268**	**5**	**48**	**13**	**12**	**1**	**6**	**353**	**19**	**0**	**3**	**0**	**0**	**0**	**0**	**22(*)**
Total Number of Structures			**231**	**0**	**51**	**4**	**16**	**1**	**1**	**304**	**676**	**8**	**76**	**35**	**26**	**3**	**7**	**831**	**26**	**0**	**3**	**0**	**0**	**0**	**0**	**29(*)**

(*) The 8 businesses (informal) local product sales businesses located on land parcels that were previously expropriated by KGM for the construction of the D-695 state road are included in this list, as they will not be re-expropriated by KGM. However, they are covered under the RAP and separately discussed in Section 3.2.2.3.

3.2.2.1. Affected Houses

The houses within the Expropriation Corridor have been identified based on the Expropriation Plans. The Structure Identification Reports are under preparation.

According to the Expropriation Plans, affected houses include the following main categories:

- House (masonry or brick, single storey or multi-storey)
- Vineyard house
- Prefabric house

The Expropriation Plans do not specify the type of house and its occupancy status or identify the users (e.g. owners, formal tenants, or informal occupants) of the affected houses. The RAP field surveys (began in May 2025) aim to conduct a full census of affected houses (in two phases – scheduled to be completed in May and June 2025) and seek to identify the following aspects related to the affected houses and the residing households:

- Type of house and occupancy status (e.g., permanent residence, non-permanent residence such as vineyard cottage, seasonal/weekend house etc., vacant building, uninhabitable building)
- Ownership/tenancy status of users (e.g., owner, formal tenant, informal user)
- Socio-economic conditions of the residing households, including their sources of livelihood and vulnerabilities of household members, if any
- Resettlement plans or alternatives that have been considered

A stand-alone log of affected greenhouses, including ownership information, is maintained in the Project's database (also published separately as the Supplementary RAP Data on Affected Structures). The compensation and relocation assistance to be provided to affected houses, as well as formal and informal users of affected houses, are outlined in the RAP Entitlement Matrix. The SPV will maintain ongoing consultations with owners and users of affected houses as part of the SEP. Additionally, the Project's Grievance Mechanism will remain accessible to all stakeholders, including affected, throughout both the construction and operation phases of the Project.

Temporary E&S Impacts during Construction

The potential health and safety risks and impacts of construction activities on local communities, such as noise, vibration, air quality, and community health and safety, are addressed in the Project's ESIA. Environmental and social (E&S) avoidance and mitigation measures will be implemented by the EPC Contractor. These measures, such as dust suppression, mitigation of blasting impacts through optimised blasting design, vibration monitoring, and construction traffic management, will be carried out in accordance with the Project's ESIA, the Environmental and Social Management Plan (ESMP), and relevant subject-specific E&S management plans.

To manage and resolve such impacts during the construction phase, the SPV will implement the **Project's grievance mechanism** in accordance with the SEP.

With regard to potential impacts on residential structures, particularly those related to blasting and vibration, the SPV will commission baseline surveys of existing building structures and integrity at receptors close to the blasting sites should be undertaken so that impacts and any damage arising from blasting activities can be identified during the periodic monitoring. It will be completed prior to the commencement of construction activities affecting the relevant structures, to ensure appropriate mitigation and management measures are in place.

Potential E&S Impacts during Operation

In addition to houses located on parcels within the expropriation corridor, residual impacts during the operation phase, such as noise and risks to community health and safety, may be significant and may necessitate the physical displacement of certain houses situated outside, but in close proximity to, the expropriation corridor.

Construction and operation phase impacts on these houses, including potential loss of property value, noise, vibration, and effects on household livelihoods, will be identified through periodic E&S monitoring and stakeholder consultations during the operation phase of the Project. These impacts will be managed through the **Project's grievance mechanism.**

The grievances raised during the operation phase will also be assessed by the IESC as part of their periodic E&S monitoring studies. If a grievance results in a confirmed finding of damage or risk to the affected households, appropriate measures will be undertaken in accordance with the principles of this RAP, and in consultation and agreement with the Lenders.

The list of settlements with affected houses and the number of parcels in each settlement with affected houses is presented in Table 3-18.

Table 3-18. Number of Parcels with Affected Houses and Affected Structures per Settlement

No	District	Neighborhood	Number of Parcels with Affected Houses							
			Private Parcels		Public Parcels			Co-owned by Private & State	Legal Entities	Total Parcel with Houses
			Private	Litigious	Treasury	Non-registered (NR)	Forest (Treasury or NR)			
1.	Serik	Deniztepesi	2							**2**
2.	Serik	Sarıabalı			13		1			**14**
3.	Serik	Üründü	9							**9**
4.	Serik	Burmahancı	1							**1**
5.	Serik	Cumalı	1							**1**
6.	Serik	Aşağıçatma	4							**4**
7.	Manavgat	Çakış	6		1					**7**
8.	Manavgat	Taşağıl	8		3	1	2	1		**15**
9.	Manavgat	Hocalar	1							**1**
10.	Manavgat	Yavrudoğan	1		1					**2**
11.	Manavgat	Çolaklı			3					**3**
12.	Manavgat	Seki	4		1		1			**6**
13.	Manavgat	Kalemler	5							**5**
14.	Manavgat	Evren	1							**1**
15.	Manavgat	Ilıca	1							**1**
16.	Manavgat	Şişeler			1	1				**2**
17.	Manavgat	Yukarıışıklar	13							**13**
18.	Manavgat	Dikmen	1							**1**
19.	Manavgat	Bucakşeyhler	2		1					**3**
20.	Manavgat	Aşağıışıklar	1		1					**2**
21.	Manavgat	Cevizler	1							**1**
22.	Manavgat	Hacıobası	10		2					**12**
23.	Manavgat	Uzunlar	1		3					**4**
24.	Manavgat	Kadılar	1							**1**
25.	Manavgat	Örenşehir	2							**2**
26.	Manavgat	Karakaya	12							**12**
27.	Alanya	Alara	7		7	1			1	**16**
28.	Alanya	Çakallar	11		1					**12**
29.	Alanya	Avsallar	1				1			**2**
30.	Alanya	Akdam	12							**12**
31.	Alanya	Türkler					2			**2**
32.	Alanya	Emişbeleni	12		2					**14**
33.	Alanya	Toslak	16		4		3			**23**
34.	Alanya	Elikesik	9							**9**
35.	Alanya	Telatiye	19			1				**20**
Total Number of **Parcels**			**175**	**0**	**44**	**4**	**10**	**1**	**1**	**235**
Total Number of **Structures**			**231**	**0**	**51**	**4**	**16**	**1**	**1**	**304**

Source: SPV, May 2025. Expropriation Plans

Figure 3-6 presents photographs of sample affected houses to provide a general overview. The Structure Identification Reports, currently being prepared by the appointed engineering firm, will include photographs of all affected houses located on the impacted parcels.

	
Tasagil, Manavgat (515/415) House used as Permanent Residence by a Single Household (vehicle belongs to the Project)	**Bucakseyhler, Manavgat (215/19)** Vacant Vineyard House
	
Telatiye, Alanya (528/1) Multi-storey apartment building used as permanent residence by multiple households (relatives) – the egg packaging facility owned and operated by households is established on the ground floor	**Emisbeleni, Alanya (216/4)** Multi-storey apartment building used as permanent residences by multiple households, including a formal tenant occupying the ground floor.

Figure 3-6. Photographs of Sample Affected Houses

Breakdown of structures according to their category, occupancy status, and number of households residing per category is presented in Table 3-19.

Table 3-19. Breakdown of Structures and Number of Households

No.	House Category	Occupancy Status/ Current Use	Number of Parcels Containing Structures[35]	Number of Residential Structures on the Parcels (Inhabitable or Non-inhabitable)	Number of Households Residing per Structure Type
1	Residential houses	Permanent or temporary residence	179	228	315
2	Prefabricated structures	Permanent or temporary residence	11	13	13
3	Rural outbuildings – (vineyards, garden houses)	Seasonal or occasional use (e.g., weekends, holidays)	18	22	21
4	Inhabitable structure – currently vacant	Vacant	11	14	0
5	Non-inhabitable structure – ruins and abandoned structures	Vacant	16	27	0
Total			**235**	**304**	**349**

Further information on the physically displaced households, as identified during the RAP field surveys, is provided in Section 5.2.3.6

[35] If a parcel contains vineyards or non-habitable structures along with residential houses, these structures are considered as part of the parcel containing residential category to double overcounting of parcel number. However, those structures are separately recorded under "Number of Residential (Habitable or Non-habitable) Structures on the Parcels. Combinations include a parcel containing both a residential house and a separate vineyard house, or a residential house and a separate ruin.

3.2.2.2. Affected Greenhouses

The greenhouses within the Expropriation Corridor have been identified based on the Expropriation Plans. The Structure Identification Reports are under preparation.

According to the Expropriation Plans and based on consultations with affected people, affected greenhouses include the following main categories:

- Glass greenhouses
- Plastic greenhouses

Greenhouses in the region primarily used for the cultivation of vegetables, including various tomato varieties, cucumbers, and peppers, as well as bananas. In addition, certain tropical fruit trees – particularly avocado, and to a lesser extent, dragon fruit, mango, and others – are also grown.

Greenhouses in the region are constructed with a variety of structural and operational features, including the following:

- **Structural System:** Greenhouses may be constructed using either **bolted** or **welded frame systems**, depending on the design preferences and durability requirements, and budget of the household.
- **Irrigation:** Most greenhouses are equipped with an **irrigation system**, typically tailored to the crop type and local water availability.
- **Automation:** Advanced operators (such as dragon fruit, mango producers) often equip greenhouses with automated systems, such as climate control, ventilation, and irrigation management.
- **Drainage:** In areas where groundwater levels are high and close to the surface, greenhouses are often equipped with a drainage system to prevent waterlogging and protect crop health.

Greenhouses are typically **operated either by landowners themselves or by formal renters**, who commonly lease the land on a **long-term basis (10–15 years)**. As a result of the Project, the operation of these greenhouses may be affected in various ways:

- **Relocation:** Some greenhouses may need to be relocated to alternative land parcels, where feasible.
- **Continued Operation with Partial Impact:** In cases involving plastic greenhouses, operations may continue at the current location, though there may be a partial loss of land and/or assets.
- **Termination of Operations:** Where no suitable alternative land is available, greenhouse operations may be terminated entirely.

Affected greenhouses may be physically relocated to alternative land parcels, provided such land is available and the greenhouses are constructed with plastic covering and bolted frame systems. The piping systems used in these greenhouses are typically disposable, whereas pumps are movable and can be reused at the new location.

The Expropriation Plans mostly identify the types of greenhouses (plastic or glass) but do not specify the occupancy status or identify the users (e.g. owners, formal tenants, or informal occupants). The RAP field surveys (May 2025) covered surveys with the greenhouses included in the survey sample.

A stand-alone log of affected greenhouses, including ownership information, is maintained in the Project's database (also published separately as the Supplementary RAP Data on Affected Structures).

Table 3-20. Number of Parcels with Affected Greenhouses per Settlement

No	District	Neigbourhood	Number of Parcels with Affected Greenhouses (GHs)							
			Private Parcels		Public Parcels			Co-owned by Private & State	Legal Entities	Total Parcel with GHs
			Private	Litigious	Treasury	Non-registered (NR)	Forest (Treasury or NR)			
1.	Serik	Deniztepesi	4						1	**5**
2.	Serik	Sarıabalı	1		12					**13**
3.	Serik	Üründü	11							**11**
4.	Serik	Belpınarı	1							**1**
5.	Serik	Burmahancı	2		1					**3**
6.	Serik	Cumalı	3							**3**
7.	Serik	Aşağıçatma	3							**3**
8.	Manavgat	Çakış	3							**3**
9.	Manavgat	Taşağıl	3		3	1	1	1	2	**11**
10.	Manavgat	Hocalar	1							**1**
11.	Manavgat	Yavrudoğan	1							**1**
12.	Manavgat	Seki	1							**1**
13.	Manavgat	Kalemler	9		2					**11**
14.	Manavgat	Evren	4		1					**5**
15.	Manavgat	Şişeler	2							**2**
16.	Manavgat	Evrenleryahşi	1							**1**
17.	Manavgat	Dikmen	1							**1**
18.	Manavgat	Ulukapı	1		1					**2**
19.	Manavgat	Aşağıışıklar	2							**2**
20.	Manavgat	Karaöz	1				1			**2**
21.	Manavgat	Aksaz		2						**2**
22.	Manavgat	Hacıisali	1							**1**
23.	Manavgat	Hacıobası	7		1					**8**
24.	Manavgat	Uzunlar	5		2					**7**
25.	Manavgat	Kadılar	1							**1**
26.	Manavgat	Örenşehir	4		2					**6**
27.	Manavgat	Yalçıdibi	2		1		1			**4**
28.	Manavgat	Karakaya	20							**20**
29.	Alanya	Alara	11		3	1				**15**
30.	Alanya	Çakallar	12							**12**
31.	Alanya	Avsallar								**-**
32.	Alanya	Akdam	28							**28**
33.	Alanya	Türkler	1				1			**2**
34.	Alanya	Payallar			1		1			**2**
35.	Alanya	Emişbeleni	39		5	6	2		1	**53**
36.	Alanya	Toslak	35		9		3		2	**49**
37.	Alanya	Elikesik	7		3	1	1			**12**
38.	Alanya	Telatiye	28	3	1	4	1			**37**
Total Number of **Parcels**			**268**	**5**	**48**	**13**	**12**	**1**	**6**	**353**
Total Number of **Structures**			**676**	**8**	**76**	**35**	**26**	**3**	**7**	**831**

3.2.2.3. Affected Businesses

The business structures within the Expropriation Corridor have been identified based on the Expropriation Plans. The Structure Identification Reports are under preparation.

Table 3-21 lists the businesses to be relocated. According to the Expropriation Plans and based on consultations with affected people, affected businesses include the following main categories:

- Retail stores, small shops, market, barber shop
- Packaging and storage facility
- Workshop (marble)
- Livestock fattening farm ("*besihane*")
- Construction facilities such as concrete plant, camp site
- Roadside local product vendors (informal on road parcels expropriated in the past for existing state-road)

The Expropriation Plans do not specify the occupancy status or identify the users (e.g. owners, formal tenants, or informal occupants) of the business structures. Some of the users could be identified during the identification surveys held in April 2025.

The RAP field surveys (began in May 2025) targeted full census of the owners and/or users of affected business structures (see Table 3-21).

In addition to the businesses that will be relocated, there are others that will not require relocation but may experience partial loss of land and/or assets, as listed in Table 3-23. These cases will be monitored during RAP implementation, and support will be provided as needed, in accordance with the RAP Entitlements Matrix.

Additionally, the RAP field surveys identified the presence of small-scale road side local product vendors in Hacıobası, Manavgat, located within the expropriated area of the existing state road D-695, as listed in Table 3-23. These shops are not included in the expropriation plans for the Project, as they are located on land previously expropriated by KGM and will not be reexpropriated. They have been covered under RAP and their status will be further investigated by the SPV during RAP implementation.

There are also non-operational businesses identified within the Expropriation Corridor, as listed in Table 3-24. Since these businesses are currently inactive, no economic displacement impacts are anticipated. These cases will be monitored during RAP implementation.

A stand-alone log of affected business structures is maintained in the Project's database (also published separately as the Supplementary RAP Data on Affected Structures).

The compensation and relocation assistance to be provided to affected business owners, as well as formal and informal users of business structures and their employees, are outlined in the RAP Entitlement Matrix, based on the findings of the RAP field surveys with the affected businesses. The continuity and status of business operations will be closely monitored throughout RAP implementation, and the SPV will maintain ongoing consultations with business owners and operators as part of the SEP. Additionally, the Project's Grievance Mechanism will remain accessible to all stakeholders, including affected businesses, throughout both the construction and operation phases of the Project.

Figure 3-7 presents photographs of sample affected businesses to provide a general overview. The Structure Identification Reports, currently being prepared by the appointed engineering firm, will include photographs of all affected businesses located on the impacted parcels.

	
Emisbeleni, Alanya (214/1) Local market – operated by renter with lease agreement	Emisbeleni, Alanya (214/1) Local barber shop – operated by renter with lease agreement
	
Hacıobası, Manavgat Roadside Local Product Vendors	Hacıobası, Manavgat (129/101) Roadside Local Product Vendor
	
Evren, Manavgat Retail Stores	Evren, Manavgat (172/2c) Retail Store

	
Evren, Manavgat (762/1) Workshop (marble)	Telatiye, Alanya (302/1) **Non-operational** Auto-service – renter moved to Antalya
	
Taşağıl, Manavgat Local Café (*Gözleme Evi*) – before start of operations	Telatiye, Alanya (121/1) Retail Store (Tent, Awning, Tarpaulin)
	
Telatiye, Alanya (135/5) Retail Store (Pool Chemicals)	Toslak, Alanya (326/66) Retail Milk Production and Store

Figure 3-7. Photographs of Sample Affected Businesses

Table 3-21. List of Parcels with Affected Business Structures to be Relocated

No	Business	Activity	Status of Operation	Business Owner	Land and Structure Ownership/ tenancy	Lease Agreement valid until	KM Chainage	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Type of Title Deed	Number of Employees (see Section 12.2 for vulnerable employees)	RAP Survey Questionnaire
1	BUS-235/1	Screening facility (sand)	Operational	Male (100% owner)	Building owner, land tenant	1 Dec 2032	10+733	Serik	Cumalı	235/1	3,396,82	2,335,38	Plot	7	Yes
2	BUS-102/52	Retail store	Operational	--	--	--	11+566	Serik	Aşağıçatma	102/52	50,272.23	7,603.96	Garden	--	No – unreachable respondent
3	BUS-102/49	Production (plastic fruit crate)	Operational	2 male shareholders (50% each)	Owner (building and land)	--	11+573	Serik	Aşağıçatma	102/49	10,544.24	10,544.24	Agricultural Land	14	Yes
4	BUS-102/46	--	Operational	--	--	--	11+580	Serik	Aşağıçatma	102/46	4,846.32	4,846.32	Agricultural Land	--	No – unreachable respondent
5	BUS-102/27	Automative accessories and materials retail	Operational	Male (100% owner)	Building owner, land tenant	--	11+600	Serik	Aşağıçatma	102/27	28,125.40	8,450.97	Agricultural Land	1	Yes
6	BUS-515/179	Café (“*Gozleme evi*”)	Operational	Female (100% owner)	Treasury (tenant)	1 May 2026	0+500	Manavgat	Tasagil	515/179	5,984.97	478.91	Raw Soil	1	Yes
7	BUS-764/11	Retail store (agricultural equipment)	Operational	Male (100% owner)	Owner (building and land)		5+580	Manavgat	Evren	764/11	8149.00	8149.00	Agricultural Land	14	Yes
8	BUS-762/1	Workshop (marble)	Operational	Male (100% owner)	Tenant (building and land)	1 Mar 2026	6+000	Manavgat	Evren	762/1	10,529.00	8,057.00	Agricultural Land	1	Yes
9	BUS-712/2a	Retail store (shoe)	Operational	Male (100% owner)	Tenant (building and land)	27 Dec 2025	7+125	Manavgat	Evren	712/2	1,441.00	1,440.71	Plot	2	Yes
10	BUS-712/2b	Market	Operational	Male (100% owner)	Tenant (building and land)	1 Jan 2026								1	Yes
11	BUS-712/2c	Retail store (textile)	Operational	Male (100% owner)	Tenant (building and land)	1 Apr 2026								5	Yes
12	BUS-712/2d	Retail store (gift shop)	Operational	Male (100% owner)	Tenant (building and land)	1 Mar 2026								1	Yes
13	BUS-712/2e	Retail store (textile)	Operational	Female (100% owner)	Tenant (building and land)	31 Dec 2025								1	Yes
14	BUS-176/1a	Retail store (textile)	Operational	Male (100% owner)	Tenant (building and land)	-	7+125		Evren	176/1	1,000.23	377.45	Plot	3	Yes
15	BUS-176/1b	Retail store (shoe)	Operational	Male (100% owner)	Tenant (building and land)	30 Dec 2025								4	Yes
16	BUS-176/1c	Pharmacy	Operational	Male (100% owner)	Tenant (building and land)	31 Apr 2026								1	Yes
17	BUS-129/101	Retail store (food and local products)	Operational	5 shareholders (20% each)	Owner (building and land)	--	3+500	Manavgat	Haciobasi	129/101	5,600.41	4,794.03	Agricultural Land	4	Yes
18	BUS-129/99	Retail store (local natural products)	Operational	--	--	--	3+500	Manavgat	Haciobasi	129/99	967.12	967.12	Agricultural Land	--	Yes
19	BUS-144/3	Livestock fattening farm (“*besihane*”)	Operational	Male (100% owner)	Building owner, land informal user (Treasury)	--	135+000	Alanya	Emisbeleni	144/3	34,654.68	8,292.94	Agricultural Land	3	Yes
20	BUS-326/66	Retail milk production and store	Operational	Male (100% owner)	Building owner, land tenant (Treasury)	1 Mar 2031	139+100	Alanya	Toslak	326/66	2,567.62	2,307.37	Barn and Agricultural Land	4	Yes
21	BUS-528/1	Egg packaging and storate facility	Operational	Male (100% owner)	Owner (building and land)	--	141+500	Alanya	Telatiye	528/1	1,304.42	1,304.42	Plot	23	Yes
22	BUS-121/2	Retail store (Chrome)	Operational	--	--	--	141+500	Alanya	Telatiye	121/2	7,512.32	7,512.08	Masonry House and Agricultural Land	--	No – unreachable respondent
23	BUS-121/1	Retail store (tent, awning, tarpaulin)	Operational	2 male shareholders (50% each)	Tenant (building and land)	31 Dec 2025	141+500	Alanya	Telatiye	121/1	8,462.13	2,677.58	Agricultural Land	16	Yes
24	BUS-135/5	Retail store (pool chemicals)	Operational	Male (100% owner)	Tenant (building and land)	2034	141+500	Alanya	Telatiye	135/5	5,078.91	5,078.75	Reinforced Concrete House and Agricultural Land	16	Yes
25	BUS-135/7	Workshop	Operational	--	Tenant	--	141+500	Alanya	Telatiye	135/7	59,130.23	39,537.43	Agricultural Land	--	No – non-respondent
26	BUS-135/35	Workshop	Operational	--	Tenant	--	--	Alanya	Telatiye	135/35	11,856.94	11,856.56	Agricultural Land	--	Same person with above
27	BUS-214/1a	Barbershop	Operational	Male (100% owner)	Tenant (building and land)	-	0+200	Alanya	Emisbeleni	214/1	508.31	508.31	Agricultural Land	1	Yes
28	BUS-214/1b	Market	Operational	Male (100% owner)	Tenant (building and land)	-								2	Yes
29	BUS-213/4	Retail store (plastic and aluminum joinery)	Operational	Male (100% owner)	Tenant (building and land)	1 Jan 2026	1+900	Alanya	Emisbeleni	213/4	1,350.48	511.13	Masonry House and Courtyard	3	Yes

(*) --: To be determined during RAP implementation.

Table 3-22. Businesses that will not be Relocated but may experience Partial Loss of Land and/or Assets

No	Road Part	KM Chainage	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Type of Title Deed	Ownership Status	Type of Structure (according to Google Earth Image)
1	Serik Connection Road	5+343.38	Serik	Üründü	133/29	13,873.35	4,081.21	Agricultural Land	Private	Car Park
2	Serik Connection Road	11+487.97	Serik	Aşağıçatma	102/75	34,462.88	1,536.58	Agricultural Land	Private	Restaurant *("Bizim Park")*
3	Serik D-400 Connection Road	1+730	Serik	Çandır	0/713	4,276.00	129.06	Agricultural Land	Private	Container Depot *("Topaktaşlar Konteyner")*
4	Serik D-400 Connection Road	1+790	Serik	Çandır	0/712	4,187.00	113.56	Single-Storey Concrete Storage Building and Agricultural Land	Private	Business Shop *("Akbabalar Ticaret")*
5	Serik D-400 Connection Road	1+820	Serik	Çandır	0/711	4,146.00	145.64	Agricultural Warehouse and Facility	Private	Cold Storage Warehouse
6	Serik D-400 Connection Road	1+870	Serik	Çandır	0/710	4,102.00	370.06	Weighbridge, Concrete Storage Building, and Agricultural Land	Private	Plastic Containers and Packaging Materials
7	Serik D-400 Connection Road	1+922	Serik	Çandır	0/1472	7,908.00	816.78	Reinforced Concrete Restaurant and Two-Storey Fuel (Gasoline, Diesel, LPG) and Service Station with Plot	Private	Petrol Station
8	Serik D-400 Connection Road	2+017	Serik	Çandır	0/959	11,684.00	901.22	Cold Storage Warehouse and Agricultural Land	Private	Cold Storage Warehouse /Concrete Plant
9	Serik D-400 Connection Road	2+120	Serik	Çandır	0/957	1,295.00	104.25	Agricultural Land	Private	Container Depot *("Antalya Konteyner")*
10	Serik D-400 Connection Road	2+135	Serik	Çandır	0/550	10,254.00	938.63	Agricultural Land	Private	Prodouction Store *("Zirvem Panel")*
11	Serik D-400 Connection Road	2+400	Serik	Çandır	0/87	5,873.00	552.06	Agricultural Land	Private	Farm *("Hacince Çiftliği")*
12	Serik D-400 Connection Road	4+758	Serik	Kayaburnu	110/86	34,977.34	4,241.47	Agricultural Land	Private	Marble *("Gündüz Mermer")*
13	Main Road	73+500	Manavgat	Çolaklı	882/8	47,962.96	8,617.67	Agricultural Land	Private	*Restaurant ("Yörükler Obası At Çiftliği Restaurant")*
14	Main Road	73+500	Manavgat	Çolaklı	882/9	13,925.41	2,514.8	Agricultural Land	Private	
15	Main Road	105+257	Manavgat	Uzunlar	200/23	9,728.45	3,866.65	Agricultural Land	Private	Concrete Plant
					200/58	2,718.01	705.01	Raw Soil	Treasury	
					200/60	11,539.75	4,051.44	Agricultural Land	Treasury	
					200/54	996.01	424.56	Agricultural Land	Private	
16	Tasagil Connection Road	1+500	Manavgat	Taşağıl	515/126	4,274.99	705.01	Plot	Private	Gas Station

No	Road Part	KM Chainage	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Type of Title Deed	Ownership Status	Type of Structure (according to Google Earth Image)
17	Manavgat Connection Road	1+000	Manavgat	Kalemler	148/6	25,100.68	717.46	Barn and Agricultural Land	Private	Farm
18	Manavgat Connection Road	1+200	Manavgat	Ilıca	0/1320	658.00	96.25	Garden	Private	Restaurant *("Antalya Park Bahçe")*
19	Manavgat Connection Road	1+250	Manavgat	Ilıca	0/1323	1,315.00	161.31	Garden	Private	Shop
20	Manavgat Connection Road	1+500	Manavgat	Ilıca	0/162	2,664.48	163.91	Plot	Private	Factory *("Ege Canet Akdeniz Bölge Müdürlüğü")*
21	Manavgat Connection Road	1+100	Manavgat	Ilıca	0/1251	4,007.00	2,191.09	Agricultural Land	Private	Excavation Shop *("Gülpınar Hafriyat")*
22	Manavgat Connection Road	1+500	Manavgat	Ilıca	YOL2		968.40	Road	Non-registered	Restaurant and market *("Adana Sofrası Mirza Usta and Anadolu Market")*
23	Manavgat Connection Road	0+100	Manavgat	Evren	YOL7	2,796.01	2,796.01	Road	Non-registered	Business Shop *("Baran Ticaret")*
24	Manavgat Connection Road	0+100	Manavgat	Evren	YOL8	2,294.42	2,294.42	Road	Non-registered	Carwash Store *("AA Motors")*
25	Manavgat Connection Road	6+500	Manavgat	Evren	176/2*	1,201.09	52.13	Plot	Private	Retail Store
26	Manavgat Connection Road	6+500	Manavgat	Evren	712/1*	3,814.00	35.97	Two-Storey Reinforced Concrete Building with 3 Blocks and Plot	Private	Retail Store
27	Main Road	135+300	Alanya	Emisbeleni	231/1*	6,466.23	2,280.32	One-Storey Steel Structure Building and Agricultural Land	Private	Container Depot
28	Alanya West Connection Road	141+300	Alanya	Telatiye	127/32	5,347.83	443.23	Masonry House and Agricultural Land	Private	Manufacturing Of Industrial Kitchen Equipment *("Çukurova Krom")*
29	Alanya West Connection Road	141+500	Alanya	Telatiye	306/1*	2,313.72	446.44	Two-Storey Fuel and LPG Sales Station and Plot	Private	Petrol Station
30	Konakli Connection Road	1+800	Alanya	Emisbeleni	216/6	8,926.97	3,185.06	Agricultural Land	Private	Olive Oil Factory *("Babaoğlu Zeytinyağı Fabrikası)*
31	Konakli Connection Road	1+900	Alanya	Emisbeleni	213/3*	5,121.58	219.70	2 Masonry House and Agricultural Land	Private	Market *("Seç Market")*

Table 3-23. Businesses Identified on Land already Expropriated by KGM for Existing State-roads (D-400 and D-695)

No	Road Part	KM Chainage	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Type of Title Deed	Ownership Status	Type of Structure (according to Google Earth Image)	Status of Relocation
1	Serik D-400 Connection Road	2+100	Serik	Çandır	0/1345	844.61	Road	KGM	Petrol Station	No relocation - partial loss of land and/or assets
2		2+000			0/1347	1,174.25			Restaurant &Petrol Station	
3		1+900			0/1349	1,039.68			Automative Shop	
4		1+800			0/1351	1,005.02				
5	Manavgat East Connection Road	3+100	Manavgat	Hacıobası	129/103				Natural Products Sales Areas	To be relocated
6					129/105	6,041.00			Natural Products Sales Areas	
7					129/100[36]	1,067.58			Natural Products Sales Areas	
8					132/51	--			Natural Products Sales Areas	
9					132/52	--			Natural Products Sales Areas	
10					132/54	--			Natural Products Sales Areas	
11					132/56	--			Natural Products Sales Areas	
12					132/60	1,808.92			Natural Products Sales Areas	

[36] This parcel is being used by the owner of parcel BUS-129/101 and BUS-129/99.

Table 3-24. Non-Operational Businesses within the Expropriation Corridor

No	Business	Activity	Status of Operation	KM Chainage	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Type of Title Deed	Number of Employees	RAP Survey Questionnaire
1	BUS-515/173	Concrete plant	Non-operational	1+000	Manavgat	Tasagil	515/173	15,409.16	15,409.16	1 2-Storey Administrative Building, 1 Workshop, 1 Laboratory and Concrete Plant	0	No
2	BUS-761/23	Polyester Workshop	Non-operational (vacant)	5+650	Manavgat	Evren	761/23	7,530.00	5,590.00	Agricultural Land	0	No
3	BUS-302/1	Workshop (Automobile maintenance)	Non-operational	141+400	Alanya	Telatiye	302/1	1,100.13	1,100.09	Agricultural Land	0	Yes
4	BUS-302/2		Non-operational				302/2	1,150.13	541.12	Agricultural Land	0	Yes

3.2.2.4. Affected Non-residential Structures

The affected non-residential structures identified as part of asset inventory and valuation studies include the following:

- Canopy[37]
- Balcony
- Barns
- Container
- Depot
- Fence
- Gate
- Henhouse
- Pool
- Shed
- Wall
- Water pump
- Well

The owners of these non-residential structure are compensated by KGM in accordance with the Expropriation Law, following deductions for depreciation. Top-up compensation to be provided by the SPV to cover depreciation is described in RAP – Entitlement Matrix.

3.2.3. Displacement of Existing Infrastructure Belonging to Other Institutions

KGM has consulted with relevant institutions through official correspondence to identify their existing and planned infrastructure facilities (i.e. energy transmission lines, drinking water, wastewater and stormwater infrastructure, natural gas pipelines, etc.) overlapping with the Project. To this end, the 1/5,000 scale route has been shared by KGM with relevant institutions, requesting that they indicate where their infrastructure facilities intersect the route.

The institutions are currently in the process of providing data on their existing and planned infrastructure intersecting the Motorway route. Based on the information received from each institution, the need for displacement will be assessed, and corresponding displacement projects will be prepared and submitted for approval. This will be a dynamic process that will continue throughout the Project duration. The technical teams of the SPV and the EPC Contractor will maintain an up-to-date infrastructure database, incorporating data received from the consulted institutions.

The Institutions consulted and collaborated through this process are listed below:

- Antalya Water and Sewerage Administration (ASAT)
- Directorate of State Hydraulic Works – 13th Regional Directorate
- TEDAS – 2nd Regional Directorate
- TEIAS – 19th Regional Directorate
- Türk Telekom Antalya Regional Directorate

For infrastructure identified for displacement, protocols will be signed between the Project and the relevant institutions. These protocols will outline the displacement procedures to be implemented and the technical specifications to be fulfilled. During Project implementation, the existing infrastructure intersected by the Motorway will be displaced – i.e., disconnected or removed and subsequently reinstalled or reconnected at the same location within the Motorway's expropriation corridor, so that it remains beneath the road alignment – in accordance with the conditions of corresponding protocols. Where necessary, permanent protection measures will be developed and implemented by the SPV and EPC Contractor, in coordination with the relevant institutions and subject to approval by KGM. These measures may include the application of suitable protective materials (e.g., soil or concrete) or increasing the diameter of the replacement pipes to enhance durability. The relevant institutions may impose additional technical requirements regarding the specifications of the infrastructure to be reconstructed, restrictions on the use of explosives, or the need for technical supervision during displacement works. These requirements will be implemented by the Project.

[37] Structures with open sides, no doors or windows, and a roof, built on iron, wooden, or concrete columns, constructed to provide protection from rain and sunlight.

Land Acquisition for Infrastructure Displacement

Any additional land requirements along the displacement routes will be addressed by KGM through land acquisition procedures in accordance with national legislation. This process will include securing land ownership and obtaining the necessary permits (e.g., forest permits) for the new locations and routes.

Notification of Local Communities

The notification of the local communities to be affected by interruption of services will be managed by the SPV and the EPC Contractor through implementation of Project SEP in coordination with KGM and related institutions/service providers.

3.2.4. Overhead Energy Transmission Line (OHTL) Displacement

The Project route crosses existing overhead energy transmission lines (OHTL) at certain locations (confirmation of locations are ongoing by SPV). These locations and displacement sites are currently being identified and assessed by the SPV.

The Project has engaged with the following key institutions to coordinate the relocation of the OHTLs:

- Antalya Turkish Electricity Transmission Corporation (TEIAS) 19th Regional Directorate
- Antalya Turkish Electricity Distribution Corporation (TEDAS) 2nd Regional Directorate
- Akdeniz Electricity Distribution Corporation (Akdeniz EDAS)

Displacement Protocols

Agreed actions will be formalized through protocols signed between the KGM and the relevant electricity corporations. These protocols will define the responsibilities of each party and will be implemented under the Project scope. During the protocol stage, OHTL relocation projects to be developed by the Project and specific details – such as the routes of the new OHTLs and locations of pylons – will be finalized and submitted to the relevant institution for approval.

Land Acquisition for OHTL Displacement

Following the approval of relocation plans by the relevant authorities and the signing of the corresponding OHTL displacement protocols, any additional land requirements along the displacement route will be addressed by KGM through land acquisition procedures in accordance with national legislation. This process will include securing land ownership and obtaining the necessary permits (e.g., forest permits) for the new locations and routes.

The actual physical relocation of the OHTLs will be carried out by the Project at no cost. In cases where the relocation of OHTL towers necessitates additional land acquisition, expropriation plans will be prepared by an engineering firm appointed by the SPV, subject to KGM's review and approval.

For privately owned parcels affected by OHTL displacement, expropriation will be undertaken, and easement rights (servitude – *irtifak*) for the underwire alignments will be established by KGM in line with the Expropriation Law and the approved expropriation plans.

Where applicable, the SPV will prepare a RAP Addendum and ensure that affected persons receive entitlements consistent with the RAP - Entitlements Matrix. This approach will ensure that the land acquisition and resettlement process is fully aligned with Lenders' standards.

In accordance with national legislation and the standard practices of TEIAS, areas beneath underwire alignments – where easement rights have been established – are not subject to usage restrictions; however, tree planting is prohibited, and construction is permitted only under specific health and safety conditions defined by TEIAS.

Environmental, Health and Safety (EHS) Risks and Impacts associated with OHTL Displacement

Besides land acquisition, relocation of OHTL infrastructure elements may result in community impacts, including service disruptions, construction-related nuisances, and land acquisition-related effects. The management of these potential EHS impacts, as well as associated stakeholder engagement activities, will be conducted in accordance with the Project's E&S management plans and in consultation with relevant stakeholders.

3.2.5. Gender Impacts and Gender-based Violence and Harassment (GBVH) Risk

According to the Constitution of the Republic of Türkiye, men and women have equal rights, including the right to own and inherit property. In practice, women in Türkiye do own and inherit land. The Expropriation Law does not contain specific provisions for women, as its implementation is intended to apply equally to all rightsholders, regardless of gender.

The SPV has adopted in the Project Limak Group of Companies' relevant corporate policies and principles addressing gender aspects, protecting women's rights and promoting gender equality and equal opportunities particularly in the workplaces.

The SPV has adopted the relevant corporate policies and principles of the Limak Group of Companies that address gender issues, safeguard women's rights, and promote gender equality and equal opportunities – particularly within the workplace. These policies demonstrate the Group's commitment to fostering an inclusive and respectful working environment. The key adopted policies include:

- Code of Ethics[38]
- Corporate Equality Policy[39]
- Policy of Combatting Domestic Violence[40]
- Stakeholder Involvement and Suggestion Complaint Policy[41]
- Zero Tolerance Policy against Violence and Sexual Inviolability[42]
- Procedure for Combatting the Violence and Violation of Sexual Inviolability[43]

While the Constitution of the Republic of Türkiye secures the rights of women and the Project will implement corporate policies, if not managed effectively, the land acquisition and resettlement processes associated with the Project may disproportionately impact women and exacerbate gender inequalities. According to *Addressing GBVH in the Construction Sector (Social Development Direct, 2020 – supported by EBRD, CDC, and IFC)* and *Emerging Good Practice for the Private Sector on Addressing Gender-Based Violence and Harassment (GBVH) (jointly commissioned by IFC, EBRD, and CDC Group, 2020),* the risks of GBVH associated with land acquisition processes may include the following:

- Individuals who make decisions about resettlement and compensation can abuse this power to sexually exploit vulnerable community members, such as those in female-headed households. This risk is exacerbated in places where women cannot legally hold land titles and are therefore more easily removed from their land.
- Workers may be required to consult community members on plans for a project. In some cases, for example, when land acquisition and resettlement processes are required, this can involve workers having considerable power over the allocation of resources, such as compensation and livelihood restoration.
- Community engagement processes (for example during resettlement) can provide opportunities for workers to sexually exploit community members on the basis that it will improve their access to resources. This risk is heightened where community members are poor and/or already face discrimination.

[38] https://www.limak.com.tr/files/CodeofBusinessEthicsPolicy.pdf
[39] https://www.limak.com.tr/files/CorporateEqualityPolicy.pdf
[40] https://www.limak.com.tr/files/PolicyofCombatingDomesticViolence.pdf
[41] https://www.limak.com.tr/files/StakeholderInvolvementandSuggestionComplaintPolicy.pdf
[42] https://www.limak.com.tr/files/ZeroTolerancePolicyAgainstViolenceandViolationofSexualInviolability.pdf
[43] https://www.limak.com.tr/files/Procedure%20for%20Combating%20the%20Violence%20and%20Violation%20of%20Sexual%20Inviolability.pdf

Field consultations and interviews conducted as part of the RAP process have revealed several critical gender-specific impacts experienced by women affected by displacement. While the loss of residential structures and agricultural land affects all household members, the social and economic vulnerabilities of women – particularly widows, elderly women, women with disabilities, and caregivers – require specific attention.

A summary of the gender-related risks and considerations associated with land acquisition, as identified through women's consultations conducted during the RAP surveys, is provided in Table 3-25.

Table 3-25. Summary of the Potential Gender related Implications as identified during RAP Surveys (May 2025)

Potential Gender-related Implications identified as part of RAP Surveys	**Project Context** (based on RAP survey outcomes)
Affected houses	
Within the affected households, women –some of whom experience multiple vulnerabilities such as being elderly, heads of household, or living with chronic illness or disabilities – may be disproportionately impacted by the resettlement process if appropriate mitigation measures are not put in place. According to the information gathered during RAP surveys, key gender-related risks and implications may include the following: - **Disproportionate Workload:** The physical and other burden associated with relocation and resettlement may be disproportionately placed on women, who may be responsible for organising household transitions while continuing their caregiving (especially in the case of mother with young children or children with vulnerabilities) and domestic duties. - **Barriers to Participation in Decision-Making:** Female-headed households, elderly women, and women with additional vulnerabilities may face challenges in actively participating in resettlement-related consultations and decision-making processes, limiting their influence over decisions that directly affect their wellbeing and livelihoods. - **Difficulties in Completing Administrative Procedures** Women affected by resettlement – particularly those who are elderly, heads of household, or living with disabilities or chronic illnesses – may face significant difficulties in completing administrative procedures associated with land acquisition and relocation such as completing inheritance procedures for properties being expropriated, registering newly allocated properties, accessing compensation, obtaining title deeds, connecting utilities (e.g., water, electricity), or updating official records. They may have limited mobility, lack of familiarity with bureaucratic systems, and constrained access to legal or technical support. Additionally, women may struggle to rebuild homes or search for alternative land and/or house, especially due to limited time owing to caregiving responsibilities. - **Security and Safety Concerns:** Women may experience heightened concerns related to personal safety and community cohesion, particularly if resettlement involves moving from rural to urban areas, where social networks may be weaker and risks of gender-based violence perceived to be higher.	In 5 of the households (out of 99) to be relocated, the head of household is a woman. Among the affected household members, 18 are identified as farmers and 51 as housewives. However, these may represent cases of invisible labour, as some women may in fact be working in the fields but have been identified as housewives by their spouses. This interpretation is based on the observations and insights of the RAP survey team. Women reported experiencing a high degree of psychological distress, driven by the effects of displacement, caregiving burdens, and loss of economic independence. In one case, a woman from a household to be physically displaced in Taşağıl noted that the entirety of household and caregiving responsibilities, including care for her chronically ill spouse, fell on her shoulders. Such cases were not isolated; women across affected areas reported symptoms of stress-related physical illnesses, including high blood pressure and heart conditions. In Sarıabalı, several elderly widowed women reside together in a spirit of solidarity. Over time, they have formed strong social bonds and rely on one another for daily assistance and companionship. During consultations, they expressed serious concerns about the potential of being separated as a result of the relocation process. Given their age and marital status, the risk of social isolation post-relocation is particularly high. Preserving these social networks is therefore essential to ensuring their well-being and minimising the adverse impacts of displacement.

Potential Gender-related Implications identified as part of RAP Surveys	Project Context (based on RAP survey outcomes)
Affected Lands and Greenhouses	
Women who lose their sources of livelihood due to resettlement and face difficulties in restoring them to pre-displacement levels may become increasingly vulnerable to exploitation, economic insecurity, and various forms of abuse. - In some of the affected settlements (Sarıabali, Türkler), women engage in small-scale greenhouse cultivation in their household gardens primarily for subsistence purposes, bread baking, and small-scale dairy processing. To maintain their current lifestyle and continue these activities after resettlement, it is essential that they are provided with access to similar land – albeit possibly smaller in size – suitable for home gardening and household-level food production.	During the RAP field surveys, concerns were noted regarding the potential loss of economic independence among women, particularly in cases where land loss may increase their financial dependence on male household members. Invisible Labour and Financial Dependency Women's labor, particularly in agriculture, remains largely invisible in formal assessments. Although women actively work in greenhouses, orchards, and open fields, they are typically not registered in the Farmer Registry System (ÇKS), do not have formal employment status, and are not recognised as income earners. During interviews, male household members often referred to their wives as "housewives," disregarding the unpaid and individual agricultural labour women perform. One female respondent from Hacıisalı expressed that, with the loss of the land from which she earned income, she would now have to live in financial dependence on her husband.
Affected Businesses	
Some of the businesses subject to relocation have female business owners and employ female workers. Relocating these businesses to other neighbourhoods or remote areas may result in female employees resigning or seeking alternative employment due to increased commuting distances, which often pose greater challenges for women, particularly those with caregiving responsibilities or limited access to transport. Migrant female employees may face even greater difficulties in securing formal employment with social security benefits and accessing rental housing near their new workplaces, as their foreign status often entails additional rental requirements, such as higher deposits or the need for guarantors.	**3 women-led local business** In Taşağıl, Manavgat (515-179), an affected business (small road side café and *gözleme* house) is owned and operated by a woman for almost a month. She had to take out a loan to cover a one-year rent payment in advance. She intended to contributing to her household's income as her husband working in the tourism sector faces seasonal unemployment and they have school age daughter. She may lack the financial capacity and resources to re-establish a new business from scratch. There may be no alternative roadside locations nearby where she could feasibly continue her business following the commissioning of the Motorway. In Hacıobası, Manavgat (132/60), an affected business (informal local products shop, selling pickles, fruits and other local products) is run by a woman who expressed concern that if she loses her enterprise, she will be forced to seek employment elsewhere. However, due to her age (over 45), she considers finding a new job difficult. In Evren, Manavgat (parcel 712/1), Antalya, there is a small-scale clothing boutique located on Sahil Caddesi, operated by a woman entrepreneur. Her customer base primarily consists of tourists, and the boutique reportedly serves as her sole source of income. Reestablishing her business may be challenging due to local tourism-driven market dynamics, particularly the informal "key money" practice ("*hava parası*"), which reportedly requires substantial upfront payments to secure commercial space. These payments may be unaffordable for her, limiting her ability to resume operations.

At the Project-level, the following gender equality and GBVH risk management measures will be implemented by the SPV and the EPC Contractor:

- **Compensation and Resettlement Assistance:** Women owners and shareholders will receive compensation and resettlement support in accordance with the provisions outlined in the RAP – Entitlement Matrix. The Project will put in place mechanisms and monitor to ensure that that they receive resettlement assistance in accordance with the provisions outlined in the Entitlement Matrix (Section 7.2), thereby promoting equitable access to support measures and benefits.
- **Inclusive Stakeholder Engagement:** Women members of all affected households will continue to be actively engaged throughout the implementation and monitoring of the RAP. The Project will employ both male and female Community Liaison Officers (CLOs) to support gender-responsive communication and outreach.
- **Zero Tolerance for GBVH at Workplaces:** The SPV's senior management will prioritise the prevention of GBVH across all Project-related workplaces by requiring full compliance of Project operations with relevant corporate policies and procedures.
- **Grievance Redress Mechanism for GBVH:** The Project's grievance mechanism will include dedicated procedures to ensure that GBVH-related complaints are reported and addressed through a confidential, survivor-centred, and safe process. Grievance Committee will be established for handling GBVH complaints.
- **Independent Evaluation of Sensitive Complaints:** In cases involving allegations against Project senior management or community members, and where trust in the Project's internal grievance process is compromised, external support from third-party gender experts, will be sought to ensure an impartial evaluation and resolution of GBVH-related complaints.
- **Capacity Building for Grievance Committee Members and RAP Implementation Team:** Members of the Grievance Committee and RAP Implementation Team will receive specialised training, delivered by qualified third-party gender experts, based on GBVH good practice guidance. This will equip them to effectively document, investigate, and respond to GBVH complaints.
- **Employee Training and Code of Conduct:** All Project employees and workers – including those hired directly and through EPC contractors – will receive induction and onboarding training on Project policies and procedures, including those related to GBVH. They will be required to sign a declaration confirming their understanding of the Code of Conduct and completion of GBVH-related training.
- **Monitoring of GBVH-related grievances as part of RAP Implementation:** Periodic RAP monitoring will include the tracking and evaluation of any GBVH-related grievances and the effectiveness of their resolution.

3.3. Cumulative Land Acquisition and Resettlement Impacts

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

The following categories describe groups who may be particularly vulnerable to such cumulative impacts:

(i) Lands affected by other regional developments and projects: People whose land or livelihoods are impacted by additional infrastructure or development projects in the same region may experience cumulative displacement effects.

(ii) Lands affected by both the Motorway and ancillary Project facilities: People whose assets are affected by the main Motorway project as well as associated facilities located outside the Motorway's expropriation corridor – such as construction camps, facilities or storage sites – may face cumulative land acquisition impacts.

(iii) Land owners or users with multiple parcels affected by the Project: People who own or use more than one parcel of land affected by various components of the Project may face cumulative impacts, increasing their overall exposure to loss of land, assets, and sources of income.

An assessment of the parcels that are cumulatively affected under each category has been conducted as part of this RAP by using geographical information system (GIS) tools and through analysis of the expropriation plans of the Project, as outlined below.

(i) Lands affected by other regional developments and projects

Other projects and developments assessed in the Project ESIA – Chapter 17 ("Cumulative Impact Assessment"), based on their temporal and spatial overlap with the Antalya – Alanya Motorway Project, are listed in Table 3-26.

Additional developments identified in the Preliminary Project Route and Justification Report (SPV, November 2024) are also listed in this table. As part of the RAP surveys, settlement heads and affected households were interviewed to identify other past, ongoing or reasonably foreseeable developments in the vicinity of their settlements. The respondents referred to past energy transmission line (ETL) projects and natural gas pipelines, but no major impacts was referred to by the respondents.

This includes parcels located in certain neighbourhoods that were previously (partially) expropriated under other developments or projects and will be subject to additional expropriation under the Antalya – Alanya Motorway Project

The following will be determined and assessed as part of ongoing permitting processes and during RAP implementation:

- Overlapping Status with the Project
- Number of Parcels with Parts Acquired by Both Projects
- Potential for Cumulative Displacement Impacts

Aside from these developments identified/to be identified, the **Regulation on Facilities to be Built or Opened Adjacent to Roads stipulates setback distances from the road boundary** (defined as the property boundary in the case of expropriated parcels), as outlined in Section 2.9.

Table 3-26. Other Developments in the Regional and Potential for Cumulative Land Acquisition and Resettlement Impacts

Industry Sector	Other Project/Development	Source of Information	Overlapping Status with the Project
Infrastructure – Rail	Seydisehir – Antalya Railway	Preliminary Project Route and Justification Report (SPV, Nov 2024)	To be determined as part of ongoing permitting process with the relevant authorities or during RAP implementation
	Railway	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Overlap at – 0+630
	Railway	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Overlap at – Tasagil Connection Road (66+960; 2+449)
	Antalya-Konya-Aksaray-Nevsehir-Kayseri Railway	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Overlap at – 3+140; 87+725 – 87 + 765; 138+928
Infrastructure – ETL	Kasimlar Hydroelectric Power Plant Energy Transmission Line (ETL)	ESIA (2025) (*) The Project is in operation according to ESIA)	To be determined as part of ongoing permitting process with the relevant authorities or during RAP implementation
	Varsak-Serik-Belek ETL	ESIA (2025) (*) The Project is in operation according to ESIA)	Same as above
	Manavgat – Oymapınar ETL (154 kV)	Preliminary Project Route and Justification Report (SPV, Nov 2024)	150 m downstream the tunnel portal exit
	Varsak – Oymapınar ETL (380 kV)	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Overlap at – 78+340
	Manavgat – Akseki ETL (154 kV)	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Overlap at – 90 + 490
	Oymapınar – Alanya ETL (154 kV)	Preliminary Project Route and Justification Report (SPV, Nov 2024)	To be determined as part of ongoing permitting process with the relevant authorities or during RAP implementation
Infrastructure – Natural Gas	Manavgat Antalya Anamur Natural Gas Pipeline	ESIA (2025) (*) The Project is in design phase according to ESIA)	Same as above
Infrastructure – Wastewater	Wastewater treatment plant	Preliminary Project Route and Justification Report (SPV, Nov 2024)	No overlap – North of 90+750
Irrigation projects	Serik – Deniztepesi Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	To be determined as part of ongoing permitting process with the relevant authorities or during RAP implementation
	Manavgat – Naras Irrigiation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above
	Manavgat Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above
	Oymapınar Dam Access Road Koprucay Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above
	Yavrudogan Dam Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above
	Alanya-Yenikoy Yerkopru Dam Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above
	Yenikoy Dam Irrigation	Preliminary Project Route and Justification Report (SPV, Nov 2024)	Same as above

(ii) Lands affected by both the Motorway and ancillary Project facilities

This category includes parcels affected by both the Antalya – Alanya Motorway and other Project components.

During the RAP surveys conducted in May 2025, none of the surveyed households reported land affected by both the Motorway and ancillary Project facilities. This may be attributed to the fact that the locations of the ancillary facilities are not yet widely known to the public.

During RAP implementation, the public will be informed about the ancillary Project facilities as site selections are finalized following the successful completion of the permitting process. Potential cumulative impacts will be identified on a case-by-case basis by the SPV–RAP Implementation Team, through consultations with mukhtars as well as with the formal and informal owners and users of the parcels to be affected.

(iii) Land-owners or users with multiple parcels affected by the Project

The RAP field surveys have identified several land-owners or users with multiple parcels affected by the Project, as listed in Table 3-27. The list is a work in progress and will be updated to include additional households identified during the ongoing RAP field surveys.

Table 3-27. Selected Parcels Owned or Used by Individuals with Multiple Parcels Affected by the Project, within the RAP Survey Sample

District	Settlement	Lot/Parcel No.	Affected Assets
Manavgat	Hacıobası	133/8	- Residential house - Commercial shop located along the existing state road (D695 state road) rented out to others for rental income - Olive grove parcel adjacent to their home, which is used for agricultural purposes - Become unable to work due to an injury sustained in an accident
Manavgat	Çakış	150/6	- Two separate land parcels, one including household's residential house, while the other is used for agricultural purposes.
Manavgat	Çakış	128/172	- Residential house along with two additional land parcels
Alanya	Toslak	225/42	- A total of six treasury parcels used by the household (five in Toslak and one in Emişbeleni). - Greenhouses owned by the household on the treasury parcel affected in Emişbeleni - A residential house, inhabited by a grandfather and his two grandchildren, who reside there permanently.
Alanya	Alara	143/5, 143/6 143/7	- Three parcels reportedly continuing households all landholding, once including an incomplete residential house construction

Source: GEM, May 2025. RAP Field Surveys.

In case potential for cumulative impacts are identified during RAP implementation phase – based on claims and grievances, or through periodic monitoring – a field-based cumulative impact assessment study will be conducted by the RAP implementation team, with support from third-party consultants as required, to make parcel-based identification of affected owners and users, assess and address these impacts. The key components of this study are outlined below:

- Assessment of cumulative economic impacts on affected people\ including the significance of such impacts and the land-based nature of livelihoods. Ownership of adjacent parcels by PAPs will also be considered. The study will determine any household-specific additional compensation requirements, if applicable.
- Evaluation of potential impacts on owners/shareholders resulting from setback distances incorporated into the zoning plans implemented within the Project area.
- Analysis of potential impacts on land value due to regulatory restrictions, particularly in zoned areas, based on a review of relevant national legislation.

Based on the outcomes of this study, specific mitigation and management measures will be developed and implemented by the SPV during RAP implementation.

3.4. Potential Additional Expropriation Works and Change Management

This RAP has been prepared based on the expropriation plans currently approved by KGM.

The Project may require further land acquisition beyond the currently defined expropriation corridor, either during construction or, on a limited basis, after commissioning. This may result from factors such as ongoing design optimisation or modifications – subject to approval by KGM and may include the following:

- Technical requirements during construction to ensure motorway safety and stability (e.g. additional slope stabilization at embankments, drainage infrastructure for surface runoff, etc.)
- Requests from affected people for additional underpasses, overpasses, or culverts that are feasible to incorporate into design and construction
- Relocation of existing infrastructure belonging to other institutions (e.g. overhead transmission lines, gas pipelines)
- Significant environmental and social impacts that may arise during the operation phase

Any such additional land acquisition will be conducted in accordance with the provisions of this RAP. In such cases, as needed, RAP addendum documents will be prepared and implemented by the SPV, in collaboration with KGM, in accordance with the principles outlined in this RAP to address any specific displacement impacts. These addenda will be developed once the expropriation plans are available, and approved by KGM.

The SPV will promptly provide written notification of any unanticipated resettlement impacts that occur during construction, implementation, or operation which were not foreseen in this RAP.

The SPV will also inform the Lenders of such risks and impacts with a detailed description of the issue and proposed corrective actions.

3.5. Limitations

The following limitations are valid for the assessment conducted to date:

- Outstanding Valuation Reports and Ongoing Field Identification Activities as part of Expropriation Plans

  As summarised previously in Table 2-18, valuation reports have been completed and approved by KGM for the following sections of the route:

  - KM 52+000 – 56+000
  - KM 64+242.51 – 64+721.89
  - KM 80+416 – 80+656.92

  Valuation activities are ongoing for the remaining sections. As structure identification, valuation, and KGM approvals progress, additional parcels and structures may be identified as affected by the Project.

  However, the ongoing identification and valuation efforts are not envisaged to result in major changes to the impact categories and entitlements defined in this RAP. Therefore, the principles outlined herein will remain applicable to any additional land or structures identified through these processes.

  As stipulated by IFC PS5 (paragraph 16), where the exact nature or magnitude of the land acquisition or restrictions on land use with potential to cause physical and/or economic displacement is unknown for certain sections of the Motorway, the general principles of this RAP, including the entitlement matrix, shall apply. Once the ongoing identification studies in these sections are finalized and the required information becomes available, the SPV will either **update** this RAP or prepare a **RAP Addendum** covering any newly identified parcels and structures. The RAP Addendum will include a dedicated supplementary budget to address the displacement impacts associated with these additional areas. It will be submitted to the Lenders for review and approval prior to implementation.

- Outstanding Field Identification Works in Specific Settlements

  The engineering firm assigned to prepare the expropriation plans has not yet conducted identification studies in the Cakallar and Akdam neighborhoods of the Alanya district due to community hesitance. The engagement between the SPV and the community is ongoing for the planning of future studies. Nevertheless, these settlements have been included in the survey sample through the adoption of an appropriate non-response strategy, as further discussed in Section 5.1.3

  Although field identifications have not yet been conducted in these settlements, the lands and structures located within them have been included in the expropriation plans. This inclusion was based on data available to KGM through governmental databases, supported by geographical information system (GIS) tools and drone video captures. Accordingly, the assessments carried out under the RAP – including the identification and analysis of affected lands and structures as well as the calculation of the RAP budget – have taken into consideration the potential impacts in these settlements. However, it is acknowledged that exact figures may vary once field identification works are completed. To address this uncertainty, a contingency margin of 15% – a relatively high figure – has been applied to the overall RAP budget. Additionally, budget allocations for affected houses and affected businesses have each been increased by 10% to ensure adequate provisions for unforeseen impacts.

- Cadastral Approval of the Expropriation Plan

  The expropriation plan for the entire route, excluding the Serik connection and the D400, has been approved by the relevant Cadastre Directorate in May 2025. There has been changes only for 40 parcels during the cadastral review process.

Additional limitations encountered during the field surveys and further assessment of displacement impacts, along with the measures taken to address potential hesitations and enhance participation among affected people, are discussed separately under Section 5.1.4.

4. Institutional and Legal Framework

4.1. Institutional Framework

The administrative structure in Türkiye comprises the central administration ("*merkezi idare*") and local administrations ("*yerinden yönetim*"). The central administrative units that have responsibilities related to the Project – particularly in terms of land acquisition and the implementation of the RAP – are outlined in Figure 4-1.

In line with the Constitution of the Republic of Türkiye, the central administration has the power of administrative tutelage over the local administrations in the framework of principles and procedures set forth by law with the objective of ensuring the functioning of local services in conformity with the principle of the integrity of the administration, securing uniform public service, safeguarding the public benefit and meeting local needs properly.

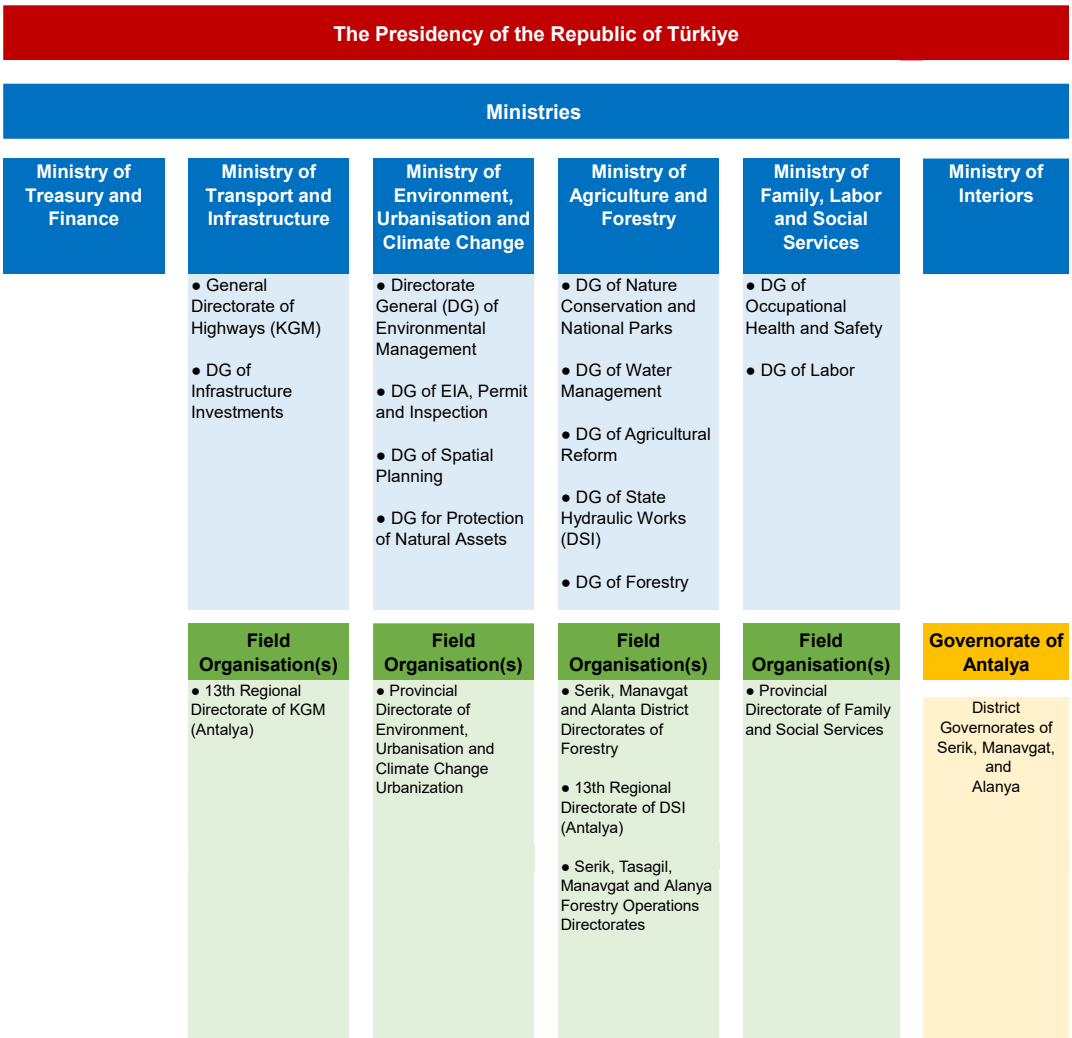


Figure 4-1. Institutional Framework relevant to the RAP – Central Administration[44]

[44] Türkiye is administratively divided into 81 provinces, based on geographical characteristics, economic conditions, and public service needs. Provinces ("*il*" or "*sehir*") are further divided into lower levels of administrative units namely, districts ("ilce"), neighbourhoods ("*mahalle*") in metropolitan municipalities and villages ("*koy*") in non-metropolitan municipalities. There are also localities ("*bagli*" or "*mezra*"), which are small settlement areas connected to villages. Pursuant to the Law on the Establishment of Fourteen Metropolitan Municipalities and Twenty-Seven Districts, and Amendments to Certain Laws and Decree Laws (Law No. 6360, 2012), the legal status of villages located within the boundaries of metropolitan municipalities was abolished and these settlements were reclassified as neighbourhoods. As a metropolitan municipality, all settlements within the districts of Antalya are classified as neighbourhoods; there are no villages or hamlets within the administrative boundaries of the city.

Ministries are the core governmental bodies of the central administration. Ministries are headquartered in Ankara and they have regional, provincial and district directorates which function as their field organisations. Provincial directorates of the ministries report to the Governorates. The Ministry of Transport and Infrastructure (MoTI), represented by the KGM, is the key institutions for the planning, permitting and development of the Project.

Türkiye is administratively divided into 81 provinces, based on geographical characteristics, economic conditions, and public service needs. Provinces ("*il*" or "*sehir*") are further divided into lower levels of administrative units namely, districts ("ilce"), neighbourhoods ("*mahalle*") in metropolitan municipalities and villages ("*koy*") in non-metropolitan municipalities. There are also localities ("*bagli*" or "*mezra*"), which are small settlement areas connected to villages. Pursuant to the Law on the Establishment of Fourteen Metropolitan Municipalities and Twenty-Seven Districts, and Amendments to Certain Laws and Decree Laws (Law No. 6360, 2012), the legal status of villages located within the boundaries of metropolitan municipalities was abolished and these settlements were reclassified as neighbourhoods. As a metropolitan municipality, all settlements within the districts of Antalya are classified as neighbourhoods; there are no villages or hamlets within the administrative boundaries of the city.

In Türkiye, the municipal system is structured into three main categories: metropolitan municipalities with their affiliated metropolitan district municipalities; provincial (non-metropolitan) municipalities with district municipalities; and town (belde) municipalities. These municipalities are primarily responsible for delivering public services to local communities in their respective jurisdictions. Following the enactment of Law No. 6360 (2012), the number of metropolitan municipalities increased to 30, and special provincial administrations in provinces granted metropolitan municipality status were abolished. Additionally, town municipalities located within metropolitan municipality boundaries were dissolved and reclassified as neighbourhoods. At the local level, the administrative structure is represented by elected metropolitan and district municipality mayors ("*belediye baskani*") and elected heads of neighbourhoods or villages ("*mukhtar*"), who act as key figures in local governance and public service coordination.

Antalya is governed by a Metropolitan Municipality. Under the jurisdiction of the Antalya Metropolitan Municipality, the following district municipalities are responsible for administering the neighbourhoods affected by the project-related land acquisition:

- **Serik** District Municipality
- **Manavgat** District Municipality
- **Alanya** District Municipality

Granting Authority – KGM

KGM is the responsible authority for conducting expropriation procedures related to BOT motorway projects. These procedures are carried out through two main entities:

- The Department of Immovables under the KGM, and
- The Regional Directorates – Immovables Chief Engineering Departments, which report directly to the Directorate General.

These departments are responsible for the following technical and administrative tasks:

- Preparation of expropriation plans based on the final design of the project
- Preparation of zoning sheets to support necessary zoning modifications
- Development of forest permit and easement plans
- Preparation of valuation maps and execution of valuation studies
- Execution of expropriation procedures and official correspondence
- Management of immovable property records and disposition processes
- Execution of procedures and activities related to borrow sites and pits

To support the valuation process, private topographical mapping firms are engaged through service procurement tenders. Since 2002, KGM has issued tenders titled *"Immovable Valuation Engineering Services"* to procure the necessary valuation data for expropriation routes. The selected engineering firms must carry out these services in accordance with the KGM Technical Specifications for the Services to be Procured for the Valuation of Immovables, issued in February 2019 (hereinafter referred to as the *"Valuation Technical Specifications"*).

Responsibilities of KGM under the Expropriation Law

KGM's responsibilities in the implementation of land acquisition processes, in accordance with Türkiye's Expropriation Law, are summarized below. (For detailed implementation arrangements, refer to Chapter 14:

- Establishing valuation and negotiation commissions, subject to approval by the Directorate General
- Conducting valuation of land, immovable assets, trees, and crops, as applicable
- Sending invitation letters to affected right holders in accordance with Article 8 of the Expropriation Law
- Engaging in consultation and negotiation with affected right holders as stipulated in Article 8
- Processing payments for expropriation costs, as approved by the Directorate General
- Transferring title deeds of lands and assets acquired through consent agreements
- Initiating court proceedings where consent cannot be obtained
- Making court-ordered payments and conducting title deed transfers for such cases
- Evaluating applications for orphan lands (unclaimed or abandoned properties)
- Ensuring timely allocation of acquired lands (after necessary permits are secured) to the SPV to align with the construction schedule
- Managing requests and grievances from affected people in compliance with the Expropriation Law
- Undertaking additional measures or actions required by project developments
- Collaborating with the SPV on issues such as stakeholder engagement, grievance management, monitoring of RAP implementation, and data exchange, in line with international resettlement standards

The organisational structure, roles, and responsibilities of the PIU, particularly in relation to the implementation of the RAP, are detailed in Chapter 14 of this document.

4.2. National Legislation

4.2.1. Constitution of the Republic of Türkiye

The Constitution of the Republic of Türkiye serves as the fundamental legal basis for the expropriation of land. Article 46 establishes the constitutional framework for the expropriation process, stipulating that private property may only be expropriated for public interest purposes, in accordance with due process, and upon the condition of prompt and fair compensation. The article ensures that all expropriation procedures are carried out within the limits prescribed by law, thereby safeguarding property rights while enabling the state to meet public service and infrastructure needs.

Article 46[45] *–The State and public corporations shall be entitled, where the public benefit requires, to expropriate privately owned real estate wholly or in part and impose administrative servitude on it, in accordance with the principles and procedures prescribed by law, provided that the actual compensation is paid in advance.*

The compensation for expropriation and the amount regarding its increase rendered by a final judgment shall be paid in cash and in advance. However, the procedure to be applied for compensation for expropriated land for the purposes of carrying out agriculture reform, major energy and irrigation projects, and housing and resettlement schemes, afforestation, and protecting the coasts, and tourism shall be regulated by law. In the cases where the law may allow payment in instalments, the payment period shall not exceed five years, whence payments shall be made in equal instalments.

Compensation for the land expropriated from the small farmer who cultivates his/her own land shall be paid in advance in all cases. An interest equivalent to the highest interest paid on public claims shall apply in the instalments envisaged in the second paragraph and expropriation costs not paid for any reason.

4.2.2. Expropriation Law of Türkiye (No. 2942, 1983)

The expropriation process in Türkiye is governed by the Expropriation Law (Law No. 2942, enacted in 1983). A summary of the procedures implemented by the KGM in accordance with this Law is provided in Figure 4-2. A detailed description of the relevant legal provisions can be found in Appendix B.

The SPV will work in coordination with KGM, offering support to ensure that the land acquisition and resettlement process aligns with applicable international standards.

The Law establishes the principles and procedures for the following actions:

- Expropriation of immovable assets owned by private individuals, legal entities, the State, or public institutions, when deemed necessary for the public interest
- Calculation of expropriation values
- Registration of immovable assets or servitude (easement) rights in the name of the authorised expropriating administration (in this case KGM)
- Reclamation of immovable assets that have not been utilised for the intended purpose
- Transfer of immovable assets between government administrations
- Resolution of disputes arising from mutual rights and reciprocal obligations governed by the Law.

Recognition of Rights (Eligibility under Law)

The Law explicitly recognizes the rights of the following groups:

- Individuals or entities with formal legal rights to land (e.g., titled landowners or shareholders)
- Formal users of state-owned lands, such as those who make regular payments to use treasury land ("*ecrimisil*")
- Individuals with customary or possession-based rights, referred to as possessors (*zilyet*).

Compensation for Possessors

In relation to compensation for structures and trees belonging to informal users (*zilyet*) of affected lands (excluding forest and pasture lands), **Article 19** stipulates:

"*For the expropriation of titled lands belonging to others, unclaimed lands, and/or lands not formally acquired by the possessor, the* ***minimum material cost*** *(Asgari levazım bedeli) of buildings and the value of trees – as determined in accordance with Article 11 – shall be paid to the possessor (zilyet).*"

[45] https://www.anayasa.gov.tr/en/legislation/turkish-constiution/

Compensation for Crops

Regarding crops, Article 20 outlines:

*"**Evacuation of cultivated lands that are subject to expropriation shall be carried out at the end of the harvesting period**. If postponing the evacuation is not feasible, the expropriating authority (in this case KGM) may proceed with evacuation **on the condition that compensation for standing crops is paid**, based on values determined by the courts. Where the value of crops is already included in the valuation conducted pursuant to Articles 11 and 12, it is not necessary to reassess or separately compensate for the crops."*

Prioritisation of Purchase through Negotiated Settlement over Judicial Expropriation (Article 8)

In expropriations to be carried out by the administrations under the Law regarding immovable properties registered in the land registry, it is essential to **primarily apply the procurement (purchase) procedure** through negotiated settlement.

As required by the Law, KGM has prioritised negotiated settlement and purchase through the Article 8 process aiming to ensure that property transfer is done with the owners' consent, reduce legal disputes, and speed up the process.

Accordingly, KGM considers filing Article 27 lawsuits for the following instances – in line with the construction schedule and depending on the current expropriation budget available for payment to right holders:

1. When the negotiations between the immovable property owners and the expropriation commission do not result in an agreement;
2. When the owners or shareholders do not attend the negotiation meetings despite receiving official invitations from KGM;
3. When the owners or shareholders attend the negotiation meetings but refuse to sign agreement protocols; or;
4. When the parties agree on the compensation amount, but there are annotations or declarations on the title deed that prevent the transfer, or when inheritance procedures have not been finalized, title registration cannot be completed under the negotiated settlement process defined in Article 8. **As a result, such cases do not conclude with a formal agreement protocol.**

It should be noted that, in certain circumstances, right holders may be open to reaching a negotiated settlement. However, **various other obstacles may hinder the finalisation of such agreements**. Consequently, agreement rates or the number of lawsuits should be interpreted alongside other contextual factors, which may include the following:

- The existence of annotations such as mortgages, liens, or enforcement orders on the title records of the immovable property subject to expropriation, unresolved inheritance transfers, or ongoing court cases concerning the property (such as cadastral boundary or area correction cases, title cancellation and registration cases, and guardianship cases) constitute legal barriers to negotiated settlement.
- Additionally, within the scope of the AAO Project, **most of the immovable properties located in the expropriation area are large in size and co-owned by multiple shareholders**. The structures and land on these properties are used by the shareholders according to informal divisions they have arranged among themselves. The inability of shareholders to reach consensus among themselves during negotiation meetings significantly reduces the rate of settlement.

For ongoing and future expropriation processes, Article 27 will be used only as a last resort and will not be initiated by KGM until:

- All right holders have been invited by KGM to negotiation meetings through Article 8 negotiations;
- Additional consultation efforts have been carried out by the SPV to encourage greater participation of affected persons in meetings, to ensure they are informed of their legal rights, and to communicate the entitlements available to them under the RAP. These efforts also include providing guidance and, where feasible, support in resolving legal obstacles to negotiated settlements – such as unresolved inheritance transfers or ongoing court proceedings; and
- Negotiation meetings have been exhausted and have ultimately failed.

The justification for all Article 27 cases will be monitored both internally by the SPV and externally by the Lenders and their IESC through RAP monitoring studies.

Accelerated Expropriation (Article 27)

A **Presidential Decree** (Decision Date: 29 March 2025, 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[46] (No. 32857) on **30 March 2025** (referred to as **Accelerated Expropriation Decision**).

As per Article 27 of the Expropriation Law, immovable property subject to expropriation may be seized through accelerated expropriation under the following three circumstances:

1. When the President issues a decision declaring a need for national defense, within the scope of the Law on National Defense Obligations (Law No. 3634);
2. In situations of emergency, as determined by Presidential decision; or
3. In extraordinary circumstances, as stipulated in special laws.

In such cases, upon the request of the relevant administration (in this case KGM), a court may authorise the seizure of the immovable property in accordance with the principles set forth in Article 10, provided that **all procedures except for valuation are completed at a later stage.**

The full text of Article 27 is provided in Appendix B. Figure 4-2 provides a flow chart summarising the expropriation process – through Article 8, Article 10 and Article 27 – implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983).

As presented in Figure 4-2, under the Article 27 process:

- After initiation of an Article 27 court case, the court determines the **Land Seizure Value**, which is then deposited into the bank accounts of the landowners/shareholders before physical entry to the land.
- Following the execution of Land Seizure Decisions, affected owners and shareholders, including heirs of deceased owners, are informed of the process outcomes through the following methods:
    - A copy of the Article 27 Land Seizure Decision is issued and delivered by the relevant court to the respective owners and shareholders, as well as to the concerned bank and land registry office. This decision states that the Land Seizure Decisions have been executed by the court and confirms that the compensation amounts deposited are immediately available for withdrawal upon application by the rightful owners.
    - The case process and outcome can be followed by each citizen via the e-Government portal.
    - If a phone number is registered on e-Government, affected parties can receive short messages regarding the updates.
- Landowners may access the compensation amount for land seizure only if the shareholders for the respective parcels are known. However, if there is a mortgage, lien, or enforcement order on the property, the expropriation compensation cannot be collected.
- Following the Land Seizure Decision, Article 10 court cases – for the establishment of the Final Expropriation Value by the court and title registration of the property on behalf of the administration – are filed by the administration (in this KGM) in accordance with the Expropriation Law.
- If the **Final Expropriation Value** determined by the court through Article 10 process exceeds the initially determined **Land Seizure Value**, the affected owners and shareholders will be paid the difference (i.e., the set-off between the Land Seizure Value and the Final Expropriation Value) at the conclusion of the Article 10 process.
- **The SPV obtains legal access to the land after the Article 27 decision**, regardless of whether the Article 10 process has commenced. For this Project, KGM has decided internally that Article 10 cases will be initiated within a reasonable period of time – ideally one month of the finalisation of Article 27 cases. This approach is intended to accelerate full acquisition of land rights and ensure timely access of right holders to the full compensation amounts.

[46] https://www.resmigazete.gov.tr/eskiler/2025/03/20250330-5.pdf

Coordination between KGM and SPV in case of Court Proceedings

As outlined above, to ensure a smooth land acquisition process, KGM will undertake several actions, including but not limited to:

- **Ensuring fair compensation** through valuations based on current market prices;
- **Prioritising negotiated settlements** in accordance with Article 8 before initiating court proceedings;
- **Filing Article 10 lawsuits** within a reasonable timeframe – defined by KGM as one month – following the finalization of the Article 10 process; and
- **Timely disbursement of compensation payments** to ensure all affected individuals are compensated prior to land entry.

In parallel to the actions taken by KGM, the SPV will provide additional support to ensure meaningful and timely engagement with all affected people, including heirs of deceased owners, and to mitigate potential disadvantages that may arise from prolonged court processes. This includes supplementary compensation and livelihood support packages offered to each affected group under the RAP Fund. These measures are designed to prevent potential adverse impacts on landowners resulting from judicial proceedings and to meet the requirements of international lenders.

- The valuation study is recent and reflects current market conditions. It has taken into account market prices, landmark court decisions, precedent sales values, current building unit prices published by the Ministry of Environment, Urbanisation and Climate Change, and other relevant factors. As the Project progresses, KGM will update the valuation rates for land and assets on an annual basis, as outlined in Section 6.3.4.
- For ongoing and future expropriation process, KGM will continue prioritising purchase method (Article 8) through negotiated settlement over Article 27. Prior to conducting Article 8 consent negotiations in accordance with the Expropriation Law, the SPV – working in coordination with KGM Regional Directorate's chief engineering department for immovable properties – will inform the landowners, shareholders, and/or heirs of the affected parcels about the land acquisition process and their legal rights under the Expropriation Law. This will include information on:
    - the steps heirs must complete to access their legal rights,
    - the support and entitlements to be provided by the SPV from the RAP Fund (in addition to the expropriation compensation to be provided by KGM),
    - and other relevant aspects of the process.

  To support this information process, the SPV has started to distribute printed copies of KGM's booklet on procedural steps of expropriation in affected settlements (Appendix F). In May 2025, the copies will initially be distributed in the following settlements, and the distribution will continue in line with the Project's expropriation and construction schedules: **Deniztepesi, Sarıabalı, Siseler, Bucakseyhler, Ulukapi, Yukariisiklar, Dikmen, and Asagiisiklar**

  Upon approval of this RAP by the Lenders, a Guide to Land Acquisition and Compensation (GLAC) will be prepared in both English and Turkish. The GLAC will provide a concise, clear, and non-technical summary of the RAP. Following its approval by the Lenders, the GLAC will be distributed to and presented to affected people to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 27 – their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements.

For land acquisitions conducted prior to the finalisation of the RAP, the SPV has contacted the affected owners to inform them about the principles of the RAP and their potential eligibility for additional support under it. This approach has been implemented for the limited number of court cases presented in Table 2-24. The owner and user of the house located on Parcel No. 515/415 in Tasagil, Manavgat (within the Main Construction Camp Site area) has been informed about the principles of the RAP and the additional support to be provided by the SPV, beyond the expropriation compensation to be paid by KGM in accordance with the Expropriation Law.

In addition, the SPV will assist the heirs of deceased owners in obtaining their inheritance certificates where necessary, and will facilitate travel and cover related expenses – such as notary and transportation costs – using the RAP Small Costs Fund, which is a component of the broader RAP Fund. The SPV will also keep KGM inform and coordinate with KGM as part of their ongoing daily communication to facilitate that the inheritance certificates of heirs are appended to the case files to be submitted by KGM to the relevant courts.

- As part of the Article 27 and Article 10 court processes, the SPV will follow up on the deposit of land seizure and/or expropriation compensation into the bank accounts of parcel owners and heirs. KGM will be consulted to ensure that this process is completed within a reasonably short timeframe.
- The SPV will inform all previously identified owners and heirs of the parcels about the court decisions, and provide guidance regarding the subsequent steps of the process – including the provision of Full Replacement Cost from the RAP Fund to compensate for depreciation applied solely in the valuation of buildings/structures.
- Within the scope of the Article 10 court processes, the SPV, in collaboration with KGM, will monitor the title deed registration and bank transaction procedures related to the owners, shareholders, and heirs of the parcels, in order to verify that these processes are proceeding smoothly and without undue delays.
- The SPV will monitor and track the outcomes of Article 27 and Article 10 court decisions in collaboration with KGM – including valuation amounts and any set-off requirements determined at the conclusion of each process. In the event such cases arise, the SPV will identify them and develop corrective actions on a case-by-case basis, to be implemented in consultation with and subject to the agreement of the Lenders, as required.

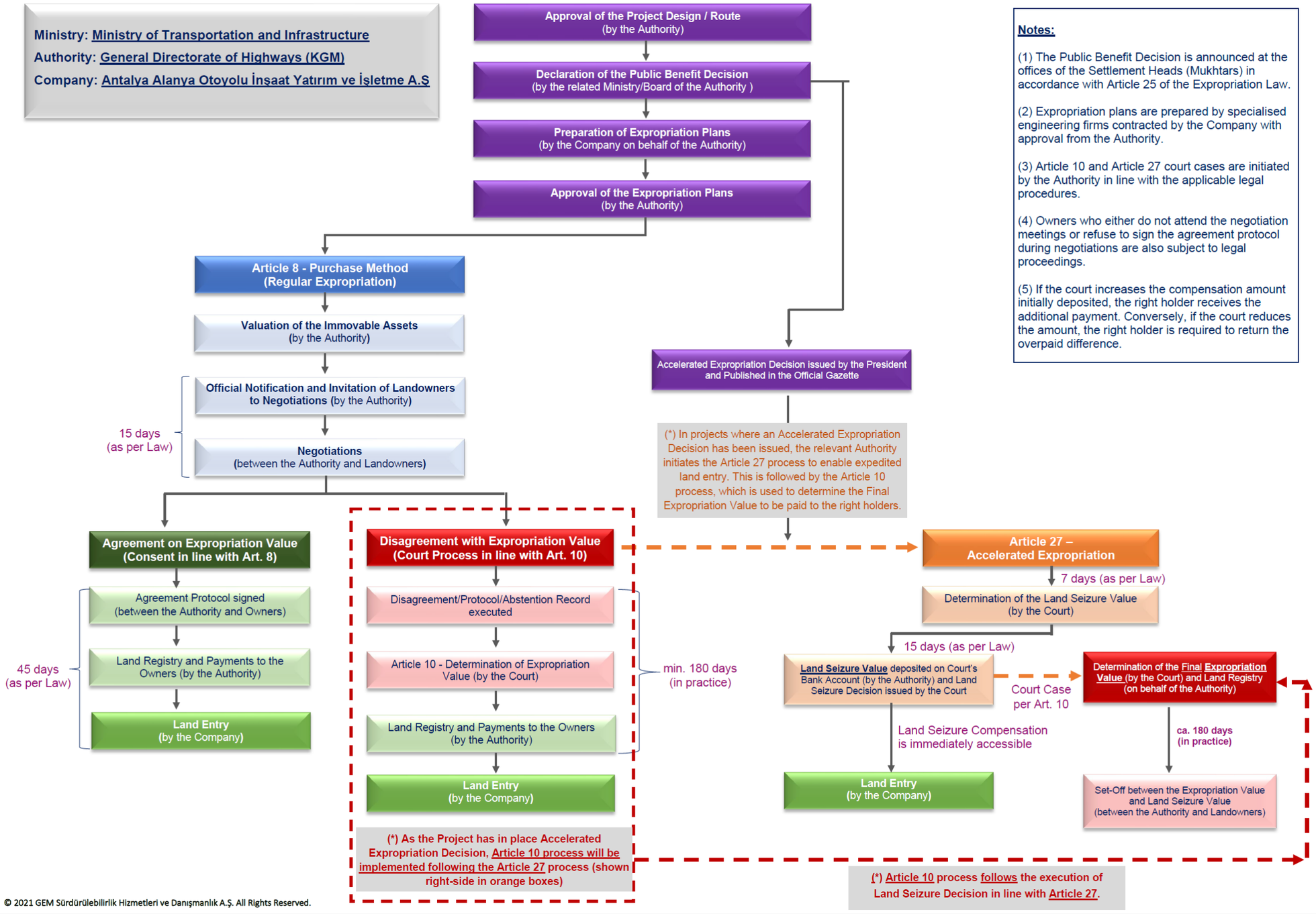


Figure 4-2. Summary of the Expropriation Process implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983)

4.2.3. Resettlement Law of Türkiye (Law No. 5543, 2006)

Resettlement activities in Türkiye are governed by the Resettlement Law (Law No. 5543, 2006) and the associated Regulation for the Execution of the Resettlement Law (please refer to Appendix B). This legislation provides for government-assisted resettlement in rural and urban areas and is primarily applied in large-scale infrastructure projects, such as dam developments, which may require the relocation of entire settlements, including district centres. The Resettlement Law is implemented by the Ministry of Environment, Urbanisation and Climate Change (MoEUCC) and the institutions authorized under its mandate.

The Resettlement Law is not applied to motorway projects implemented by the KGM, as these projects typically involve the physical displacement of a relatively limited number of structures, dispersed across distinct locations along the project alignment. In such cases, cash compensation is provided by KGM in accordance with the provisions of the Expropriation Law (Law No. 2942, as amended).

For this Project, the relocation or resettlement of affected households and businesses, including both owners and users, will be carried out in line with the Expropriation Law, implemented by KGM. This process will be conducted in collaboration with the SPV through the implementation of this RAP.

4.2.4. Other Laws relevant to Land Use, Acquisition, and/or Registration

The following laws contain provisions related to **land use**, **land acquisition**, and/or **land registration**, which may be applicable to the Project. A summary of the key provisions of each relevant law is provided in Appendix B:

- Agricultural Reform Law on Land Arrangement in Irrigated Areas (No. 3083, 1984)
- Cadastral Law (No. 3402, 1987)
- Forest Law (No. 6831, 1956)
- Land Registry Law (No.2644, 1934)
- Law on Preventing Intrusion or Possession of Immovable Property (No 3091)
- Law on the Protection of Personal Data (Law No. 6698, 2016).
- Law on Soil Conservation and Land Use (No. 5403, 2005)
- Notification Law (No. 7201, 1959)
- Pasture Law (No. 4342, 1998)
- Real Estate Tax Law (No. 1319, 1970)

4.3. International Standards

The international standards applicable to the Project include the following:

- International Finance Corporation (IFC) Performance Standards (PSs) (2012)
- Equator Principles (EP) 4 (2020)
- Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (Approved February 2016 (Amended February 2019, May 2021, November 2022, and June 26, 2024)
- Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the “Common Approaches” adopted in 2012 and revised in 2016)

The specific requirements of the respective international standards relevant to the development and implementation of the RAP are described in the following sections.

4.3.1. IFC Policy on E&S Sustainability

The Project will be implemented in compliance with the International Finance Corporation's (IFC) Policy on Environmental and Social Sustainability and the associated Performance Standards (PSs). Among the eight Performance Standards adopted by the IFC, the following are of particular relevance to the development and implementation of this RAP:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 5: Land Acquisition and Involuntary Resettlement

In addition to the core Performance Standards, the development of this RAP has also drawn upon a range of relevant good practice notes, guidance materials, and advisory documents published or endorsed by the IFC. These include:

- IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023)
- Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector (prepared by Social Development Direct; supported by EBRD, CDC, IFC, 2020)
- Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
- IFC' Good Practice Note on Addressing Grievances from Project-Affected Communities (2009)
- The Handbook for Preparing a Resettlement Action Plan of the IFC (2002)

4.3.2. Equator Principles 4 (2020)

The Project will be implemented in compliance with the fourth version of the Equator Principles (EP4, July 2020), which has been mandatory for all Equator Principles Financial Institutions (EPFIs) for any new Projects (including those with signed term sheets or mandates) as of 1 October 2020.

Among the ten principles outlined in EP4, the relevant provisions – particularly those related to stakeholder engagement and grievance mechanisms – have been taken into consideration during the development of the RAP and will be applied throughout its implementation.

Relevant guidance notes published under the Equator Principles and applicable to the development and implementation of the RAP include the following:

- EP Guidance Note on Implementation of Human Rights Assessments Under the EP (2020)

4.3.3. Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (2024[47])

The Project will be implemented in compliance with the Asian Infrastructure Investment Bank (AIIB) E&S Framework (ESF) approved in February 2016, amended in February 2019, May 2021, November 2022, and lastly June 26, 2024[48].

The AIIB's ESF is a system that supports the Bank and its clients in achieving environmentally and socially sustainable development outcomes by integrating good international practice on environmental and social planning and management of risks and impacts into decision-making on, and preparation and implementation of, AIIB supported Projects.

[47] The 2024 ESF, as amended through June 26, 2024, replace the November 2022 ESF and enters into effect on June 26, 2024.
[48] https://www.aiib.org/en/policies-strategies/framework-agreements/environmental-social-framework.html

The AIIB's E&S policy comprises the following four complementary elements.

- E&S Policy
- E&S Standards (ESSs)
- E&S Exclusion List
- Glossary

Among the three associated ESSs under the AIIB's E&S Policy – which outline more detailed mandatory environmental and social requirements to be implemented by the clients depending on the nature of the projects – the following two ESSs are applicable to the development and implementation of the RAP:

- ESS1: E&S Assessment and Management
- ESS2: Land Acquisition and Involuntary Resettlement

4.3.4. OECD Common Approaches (2016)

The Project will be implemented in compliance with the Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence ("the Common Approaches"), which was adopted on 28 June 2012 and revised by the OECD Council on 6 April 2016, which sets common approaches for undertaking E&S due diligence to identify, consider and address the potential E&S impacts and risks relating to applications for officially supported export credits as an integral part of Members' decision-making and risk management systems.

As part of this framework, the Common Approaches require the identification of both potential positive and negative social impacts, including those related to land acquisition and involuntary resettlement.

Projects that involve land acquisition and the involuntary resettlement of a significant number of affected people are included in the illustrative list of Category A projects, as presented in Annex I of the Common Approaches.

4.3.5. Gap Analysis between National Legislation and International Standards

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Avoidance and Minimisation of Displacement and Assessment of Alternatives	The client will consider feasible alternative project designs to avoid or minimize physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.	The Expropriation Law of Türkiye does not include specific provisions.	Although the Expropriation Law does not include explicit provisions regarding displacement, the expropriating authority (i.e. KGM) takes the displacement impacts of projects into account during site or route selection, to the extent feasible. KGM projects are planned and designed in line with established design criteria and technical specifications, which prioritize the minimisation of land use and expropriation to reduce expropriation costs and displacement impacts of the projects on people.	During the route selection process, KGM has avoided and minimized land acquisition and expropriation to the extent feasible, in order to reduce the socio-economic impacts of the Project and to minimize expropriation costs. In the period after signing the BOT Contract, the SPV implemented route modifications to optimise the design and minimise the Project's environmental and social risks, including land acquisition-related impacts. During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the mechanisms outlined in Section 2.10. Also, affected people will have the right to submit requests to KGM seeking the avoidance or minimisation of impacts on their assets (such as requesting acquisition of orphan lands, avoidance of their structures). These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.
Avoidance of Forced Eviction	Forced evictions[49] will not be carried out except in accordance with law and the requirements of the performance standards.	The Expropriation Law – **Article 20** defines the procedure for the "Evacuation of the Immovable Asset". Evacuation of the immovable property registered in the name of the expropriating authority under this Law is requested by the authority from the enforcement officer. The enforcement officer notifies the occupants to vacate the property within fifteen days. If the immovable property is not vacated within this period, it will be vacated by enforcement. Objection or complaint does not suspend the evacuation, and the court cannot issue a preliminary injunction.	Eviction is carried out in accordance with the provisions of the Expropriation Law after the immovable property is registered in the name of the expropriating authority. The advance notice period is limited to the timeframe specified in the Law.	The Project will avoid forced eviction. The principles guiding this commitment are outlined in Section 6.4– under "Avoidance of Forced Eviction and Procedure for Lawful Evictions". Evacuation of expropriated buildings and assets will be carried out in accordance with the Expropriation Law and the requirements of international lenders. To prevent forced eviction and allow adequate time for resettlement planning and preparation, the SPV will notify the owners and users (formal and informal) of affected land and structures at least three months prior to the commencement[50] of expropriation – taking into account KGM's expropriation schedule. If eviction becomes unavoidable, the KGM and the SPV will comply with the requirements of national legislation and the provisions of relevant international standards (such as IFC PS5). Eviction will be carried out in a manner consistent with the fundamental principles of due process, including: provision of adequate advance notice; meaningful

[49] The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.

[50] Considering that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate from the date of the finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
				opportunities to submit grievances and appeals; avoidance of unnecessary, disproportionate, or excessive use of force; prevention of homelessness; and ensuring that adequate compensation is provided prior to the eviction. The SPV will notify the Lenders prior to carrying out any eviction. This notification will include a confirmation that all applicable conditions, as outlined above, have been and are being fulfilled.
Negotiated Settlements	To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, clients are encouraged to use negotiated settlements meeting the requirements of the performance standards, even if they have the legal means to acquire land without the seller's consent.	The Expropriation Law – **Article 8** ("Purchase Method") stipulates prioritisation of the negotiated purchase method.	There is no gap as per the Law. The purchase method based on negotiation is prioritised by Law. In practice, KGM opts for negotiated settlements with the owners/shareholders to avoid court procedures (in line with the Expropriation Law) that may decelerate the progress of Project implementation and lead to additional costs associated with legal proceedings.	In this Project, KGM has **prioritised negotiated settlements** through the Article 8 process under the Expropriation Law (purchase method). Section 2.8.1 presents the status of land acquisition, including details on the negotiated settlement (consent) rates achieved by KGM since the commencement of expropriation (February 2025).
Failure of negotiation – legal proceedings	In cases where affected persons reject compensation offers that meet the requirements of the performance standards and, as a result, expropriation or other legal procedures are initiated, the client will explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring.	The Project has in place Accelerated Expropriation Decision (Presidential Decree Date: 29 March 2025, No. 9708). The Expropriation Law – **Article 27** ("Accelerated Expropriation") stipulates that a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the **procedures other than valuation** shall be completed afterwards.	In cases where negotiations fail, the expropriation value is determined by the court. The court processes can be lengthy court procedures, information and engagement with affected people may be inadequate, and issues or difficulties related to the deposition and withdrawal of compensation by affected people may pose disadvantages for the affected people.	KGM will initiate court proceedings only if negotiations under Article 8 fail. KGM and the SPV will take various measures to ensure that court proceedings do not negatively impact the affected people. These measures – including the timely provision of information to affected people at all stages of the legal process and providing assistance to affected people to conclude inheritance and succession procedures — are aimed at mitigating potential adverse impacts. A detailed description of these actions is provided in Section 4.2.2 under "Coordination between KGM and SPV in case of Court Proceedings".
Consideration of Vulnerable Groups	Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, and as part of the process of identifying risks and impacts, the client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or	According to the **Constitution of the Republic of Türkiye**, measures to be taken for children, the elderly, disabled people, widows and orphans of martyrs as well as for the invalid and veterans shall not be considered as violation of the principle of equality; the State shall protect the widows and orphans of martyrs of war and duty, together with invalid and war veterans, and ensure that they enjoy a decent standard of living; the State shall take measures to	As there are no specific legal provisions, individuals and groups who may be directly and disproportionately affected by project-related land acquisition due to their disadvantaged or vulnerable status are not specifically identified as part of the land acquisition process, and differentiated measures are not specifically or systematically developed.	The SPV has prepared this RAP in accordance with international standards, identifying vulnerability categories and vulnerable people affected by land acquisition activities within the RAP survey sample (Chapter 12). The RAP – Entitlements Matrix and the livelihood restoration, improvement, and assistance measures define specific entitlements and support mechanisms tailored to the needs of vulnerable PAPs.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	vulnerable status[51]. Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities. Particular attention will be paid to the needs of the poor and the vulnerable	protect the disabled and secure their integration into community life; the aged shall be protected by the State; state assistance to, and other rights and benefits of the aged shall be regulated by law; to achieve these aims the State shall establish the necessary organizations or facilities, or arrange for their establishment." The Expropriation Law of Türkiye does not include specific provisions.		Targeted consultations were carried out as part of RAP preparation to ensure the concerns of vulnerable groups were adequately addressed. The Stakeholder Engagement Action Plan for RAP Disclosure and Implementation phases includes specific consultation approaches and communication tools designed to engage affected vulnerable people effectively (see Section 10.3).
Consideration of Gender Aspects	The consultation process should ensure that women's perspectives are obtained and their interests factored into all aspects of resettlement planning and implementation. Addressing livelihood impacts may require intra-household analysis in cases where women's and men's livelihoods are affected differently. Women's and men's preferences in terms of compensation mechanisms, such as compensation in kind rather than in cash, should be explored. Documentation of ownership or occupancy and compensation arrangements should be issued in the names of both spouses or heads of households, and other resettlement assistance, such as skills training, access to credit, and job opportunities, should be equally available to women and adapted to their needs.	According to the **Constitution of the Republic of Türkiye**, men and women have equal rights, including the right to own and inherit property. In practice, women in Türkiye do own and inherit land. The Expropriation Law does not contain specific provisions for women, as its implementation is intended to apply equally to all rightsholders, regardless of gender. Through Article 8, both female and male owners/shareholders are invited to and can participate in the negotiations and payments are made to each party in accordance with the outcomes of these negotiations.	As there are no specific legal provisions, the differential gender impacts of physical or economic displacement are not explicitly considered, and tailored measures are not specifically or systematically developed.	In addition to the women affected people included in the random sample, the RAP survey team also planned and conducted supplementary surveys with women owners and shareholders to enhance the representation of women in the socio-economic baseline. To ensure effective participation of women, the team included a sufficient number of female surveyors. Clear communication strategies were employed to encourage open and comfortable engagement with the female participants. The Stakeholder Engagement Action Plan for RAP Disclosure and Implementation phases includes particular consultation and information tools for women (see Section 10.3).
Census and Inventory of Assets	Where involuntary resettlement is unavoidable, either as a result of a negotiated settlement or expropriation, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and	The Expropriation Law – **Article 7** ("Procedures to be Completed Prior to Expropriation") defines the procedures required to be followed for the inventory of assets (land, crops, trees, structures), identification of the immovable assets and their legal owners/shareholders and possessors ("*zilyet*").	The census and inventory of assets conducted in accordance with the Expropriation Law is limited with the legal owners/shareholders of the affected assets and the national Law does not require collection of data on informal users of lands. On the other hand, KGM has in place Technical Specifications for the Services to be Procured for the Valuation of Immovables (KGM, February	The census and asset inventory were carried out by the engineering firms appointed by KGM, in accordance with the Expropriation Law and KGM's Technical Specifications. The asset inventory covered 100% of the project alignment and identified the legal owners and shareholders of the affected assets. For the identification of formal and informal users of the affected lands and assets, the SPV engaged a third-party

[51] This disadvantaged or vulnerable status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	This data serves as the basis for the valuation study conducted by KGM, through its appointed engineering firms, in accordance with the Expropriation Law. The Expropriation Law of Türkiye recognises "*zilyet*" (**possessor**) rights where there is no title deed (in the absence of cadastral surveys). In the area where the Antalya-Alanya Motorway route passes, the cadastral works along the expropriation corridor have been completed by General Directorate of Land Registry and Cadastre (TKGM) and there are no parcels without title deed registration; hence, **no possessory ("*zilyet*") rights exist in this Project.**	2019). This requires collection of data from the owners and/or users of the parcels. The data collected is integrated to the valuation of assets. However, this data is not used for further social and/or economic monitoring of the PAPs. The assets inventory in line with the Expropriation Law is done for the full alignment covering all parcels affected by the Project within the expropriation corridor, structures built and/or used or agricultural practices done by formal and informal persons on affected parcels, including state-owned parcel (e.g. treasury parcels) (completed for the Project). On the other hand, expropriation plans include only the names of people with formal legal rights. Article 19 of the Expropriation Law stipulates that "For the expropriation of the land with a title deed belonging to others, unclaimed lands and/or lands that have not been acquired by the possessor, the minimum material cost of the buildings and the value of the trees as determined in accordance with Article 11 shall be paid to the possessor ("zilyet")". Article 19 of the Expropriation Law stipulate valuation and compensation of owners of the informal building/structures and trees on state-owned lands (e.g. treasury parcels) based on the minimum prices. Noting that "*zilyet*" rights, which are recognised under Expropriation Law of Türkiye, are not applicable to the parcels affected by the Project as the cadastral surveys have been completed for all parcels affected by the project.	implementation partner in April 2025 and user identification surveys were conducted for the full alignment. In May 2025, sample-based RAP surveys were initiated identify the categories of affected people – including owners, tenants, and formal/informal users – and to collect the necessary socio-economic data for the development of the RAP (Chapter 4). Informal and formal agricultural users of the affected parcels – including household members with vulnerabilities – who were not included in the expropriation plans approved by KGM, are identified through field surveys and interviews conducted with settlement heads and other community leaders. In May 2025, the implementation partner initiated the second phase of the user identification study to identify the owners and users of the affected houses and greenhouses. A database of affected owners and users (formal and informal), including the names and contact details of the users, is maintained in the Project's database. As part of the RAP implementation process, the sample-based surveys will be expanded to include all project-affected households. In parallel, the Project RAP Implementation Team will establish and maintain a comprehensive, up-to-date socio-economic database of all individuals affected by Project-related land acquisition. This database will capture information on households with both formal and informal land users, as well as on vulnerable individuals, consistent with the data collected during the RAP preparation phase as outlined in the earlier sections.
Eligibility Classification	Displaced persons may be classified as persons; (i)who have formal legal rights to the land or assets they occupy or use; (ii) who do not have formal legal rights to land or assets, but have a claim to land that is	The Expropriation Law recognizes the legal owners and shareholders of affected assets, as well as formal users of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – *ecrimisil*), as eligible for compensation.	The census and asset inventory by KGM identifies all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation.	The SPV has prepared a RAP in accordance with international standards. The RAP includes an Entitlements Matrix (Section 7.2), which outlines the entitlements for all eligibility categories recognised under these standards, including owners, shareholders, and both formal and informal users of the affected lands and assets.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	recognised or recognizable under national law[52]; or (iii)who have no recognisable legal right or claim to the land or assets they occupy or use. The census will establish the status of the displaced persons.	Regarding the **compensation of informal users,** the Expropriation Law – **Article 19** ("Registration of immovable properties not recorded in the land registry and the rights of the possessor") stipulates that in the expropriation of properties that are registered under someone else's name, ownerless, and/or not acquired by the **possessor**, the **minimum material cost** of buildings and the value of trees as appraised under Article 11 are paid to the possessor. This does not include informal users of forest and pasture parcels. Please refer to "Census and Inventory of Assets" row, regarding the **possessor** ("***zilyet***") **rights** recognised under Expropriation Law.	i)People who have formal legal rights to the land or assets they occupy or use are eligible for compensation under Expropriation Law. This includes formal users of state-owned lands, who may receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself. ii)People who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law, such as informal users of treasury who pay adequate pay ("*ecrimisil*") for their informal occupation, are compensated for their structures – based on minimum material cost ("***134ndivi levazım bedeli***") – and trees under Expropriation Law – **Article 19. However, no compensation is provided for the land** itself. iii)People who have **no** recognisable legal right or claim to the land or assets they occupy or use – such as informal users of forest and pasture lands are considered as **illegal occupants ("*işgalci*")**, are not entitled to any form of legal compensation for either the land or the assets.	
Cut-off Date	In the absence of host government procedures, the client will establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and disseminated throughout the project area.	The Expropriation Law – **Article 25** defines the "Restriction of Rights and Transfer of Ownership to the Administration". As per the Law, in large-scale public projects extending over future years, such as dams, irrigation networks and pipelines, highways, railways, ports, and airports, the public interest decision shall be announced by posting it for fifteen days in the neighborhood and/or village headman's office where the immovable properties to be expropriated are located. From the end date of the public interest announcement period, the value of fixed facilities built and trees planted on the immovable properties to be expropriated shall not be taken into account in the determination of the	The practices and announcements done in line with Article 8, Article 25 and Article 27 of the Expropriation Law broadly covers the cut-off date requirements of the international standards. Even though the Law does not have explicit requirements regarding information of informal users on cut-off date, the formal users of the state-owned parcels (using the land with adequate pay – *ecrimisil*) are required by the Valuation Commission to provide the adequate pay (*ecrimisil*) documentation and compensated for the standing crops. Through this process, informal/formal users are also identified (personally or through mukhtars), and they are verbally informed about the upcoming expropriation and construction processes such that the lands used informally must not be	The SPV, in consultation with the KGM, has decided to establish a cut-off date for each settlement affected by Project-related land acquisition. The cut-off dates are determined based on the completion date of the census and asset inventory surveys conducted in each respective settlement and specific to each affected settlement. The cut-off date provisions will apply to both the owners and shareholders of the lands and assets, as well as to their formal and informal users. The SPV, in consultation with the KGM, has decided to broadly communicate the cut-off date in each affected settlement, to ensure that all affected persons, and any person seeking to settle in the area, are informed. Accordingly, following completion of inventory of assets by the appointed engineering firm and KGM's approval of the expropriation plans, the SPV posts the list of affected

[52] Such claims could be derived from adverse possession or from customary or traditional tenure arrangements.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		expropriation value. The restriction on the immovable properties shall be valid for five years from the end date of the announcement. The legal owners are officially notified during Article 8 process. In cases where the procedure under Article 27 is applied, the accelerated expropriation decision is published in the Official Gazette.	cultivated further, the standing crops must be removed and the land must be evacuated. The period between the cut-off date and compensation of the affected land is essentially limited in BOT projects thus no relevant gap is foreseen in the Project.	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.
Valuation, Compensation and Benefits for Displaced Persons	When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods, as provided in this Performance Standard. Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of displaced persons are land-based[53], or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available[54] and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation[55].The client will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project.	Valuation methodology: Expropriation Law – **Article 11 "**Principles for Determining Expropriation Compensation**"** defines the principles and methodologies for valuation of lands, constructible plots ("*arsa*"), and buildings based on a set of defined criteria. The valuation methodology adopted by KGM is outlined in the *Technical Specifications for the Engineering Services to be Procured for the Valuation of Immovables* (KGM, February 2019) Valuation of Agricultural lands: The valuation is based on the capitalisation of annual net income, calculated with reference to market prices. Valuation of Structures: The valuation is based on the Approximate Unit Structure Costs published annually by the Ministry of Environment, Urbanization and Climate Change. Depreciation rates are applied based on the age and condition of each structure. Valuation of Trees: The valuation is based on with KGM's Technical Specifications for the Services to be	Valuation methodology: The expropriation values are determined in accordance with the well-established procedures set out in the Expropriation Law and are consistent with KGM's Technical Specifications. There are valuation report prepared certain parts of the route however the valuation is ongoing for the remaining part of the route. Therefore, a final valuation report for the Project is yet to be prepared. The final valuation report for the Project is yet to be prepared. Delivery of compensation: Expropriation Law – Article 26 of the Expropriation Law recognises the land-for-land approach; however, the applicability of this option in Türkiye is very limited and not feasible for this Project located in Antalya. In case of Article 27, land seizure occurs only after an official invitation has been issued, and the determined compensation amount is deposited into the bank specified in the announcement. The amount deposited is immediately accessible to the rightful owners. Subsequently, the expropriation value of the asset is re-evaluated by the court under the Article 10 process. Any difference between the initial land seizure value	The alignment of the Project's valuation activities with KGM's Technical Specifications and the required methodology will be verified by a third-party valuation expert following the completion of the final valuation report, which is expected to be finalized in Q3 2025. In Q3 2025, the SPV will commission the valuation contractor (national engineering firm) to collect, analyse, and update the 2025 income-expenditure data from landowners/users cultivating relevant crops along the project route, under the supervision of KGM. The SPV will then submit the collected data to KGM requesting valuation update by September 2025, as necessary. The SPV has prepared a RAP in line with international standards. The RAP includes an Entitlements Matrix (see Section 7.1), which provides for compensation at full replacement cost, along with additional assistance and support measures, for each category of affected people (owners and formal and informal users of affected lands, affected houses, affected greenhouses, and affected business structures, including their formal and informal employees, as necessary. The SPV will provide additional compensation to the affected people from the RAP Fund to supplement the amounts paid by KGM under Turkish Expropriation Law. This top-up payment will ensure that the total compensation received by PAPs reflects the **full replacement cost**, in line with international standards. In addition, the RAP Fund will finance the delivery of

[53] The term "land-based" includes livelihood activities such as subsistence cropping and grazing of livestock as well as the harvesting of natural resources.

[54] In certain cases it may not be feasible to pay compensation to all those affected before taking possession of the land, for example when the ownership of the land in question is in dispute. Such circumstances shall be identified and agreed on a case-by-case basis, and compensation funds shall be made available for example through deposit into an escrow account before displacement takes place.

[55] Unless government-managed resettlement is involved and where the client has no direct influence over the timing of compensation payments. Such cases should be handled in accordance with the relevant paragraphs of the performance standards. Staggered compensation payments may be made where one-off cash payments would demonstrably undermine social and/or resettlement objectives, or where there are ongoing impacts to livelihood activities.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": "*The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports*". For trees in the preparation and maintenance period (i.e. before entering the productive stage), compensation is determined using the capitalisation method. This includes costs associated with labour, machinery, and materials for cultivation, planting, irrigation, fertilization, pesticide application, and other relevant agricultural inputs, along with the rental value of the land. For commercial orchards ("*kapama bahçe*"), KGM requires orchard-based valuation calculations; however, regional directorates may apply varying approaches in practice. Valuation of Crops: In the case of cultivated land, evacuation is postponed until after harvest. If waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court. If the crop value has already been taken into account in determining the expropriation value pursuant to Articles 11 and 12, it is not necessary to determine and pay this	and the final court-determined expropriation value is settled between the authority and the owners upon conclusion of the court proceedings. Full replacement cost: The Law does not require compensation at full replacement cost, nor does it mandate the provision of additional assistance to restore or improve the living standards and livelihoods of affected people. Buildings and structures (residential, commercial or non-residential), are not compensated at full replacement cost, as depreciation is deducted based on the age and condition of each structure. In accordance with the depreciation ratios set out in the relevant Turkish legislation. Transaction costs – such as taxes, stamp duties, legal and registration fees, and relocation cost – are typically not separately included in the valuation. However, the valuation study for the Project is recent. The valuation of agricultural land has been carried out using a capitalisation approach based on annual net income, taking current market prices into account. Compensation of Formal Users: formal users of state-owned lands receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself. Please refer to "Eligibility" row. Compensation of Informal Users: informal users of treasury who pay adequate pay ("*ecrimisil*") for their informal occupation, are compensated for their structures – based on **minimum material cost** ("***asgari levazım bedeli***") – and trees under Expropriation Law – **Article 19. However, no compensation or assistance (To find replacement land) is provided for the land lost.** Informal users of forest and pasture lands are considered **illegal occupants ("*işgalci*") and** are not entitled to any form of legal compensation or assistance (to find replacement land) for either the land or the assets.	livelihood restoration, improvement, and assistance measures outlined in this RAP. Both (i) those who reach an agreement with KGM on the expropriation value in accordance with Article 8 of the Expropriation Law, and (ii) those who do not reach an agreement and whose assets are acquired through a court process under Article 27 of the same law, will be eligible for compensation and support under the RAP, through the RAP Fund established by the SPV. These entitlements are provided in addition to the cash compensation paid by KGM in accordance with the Expropriation Law. The RAP Fund will be allocated and managed by the SPV, as detailed in Chapter 11. Measures to avoid land entry before completion of land acquisition: Land permit became part of work permit system. i.e. if there is no legal right to enter to land then no construction works will be initiated by the EPC and their sub-contractors: To avoid land entry without completion of expropriation or execution of mutual agreements, the SPV has incorporated the completion status of expropriation to the Work Permit Form for Earthworks and developed land entry and exit, and consent protocols. Through these forms and protocols, the completion status of expropriation shall be confirmed and signed by the SPV – Expropriation Manager prior to issuing work permit for any excavation and/or fill work. Land entry protocols will be signed with landowners prior to any land access by the EPC Contractor. For lands to be acquired temporarily, land exit protocols will be executed with the landowners following the completion of reinstatement works and the contractor's exit from the land.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		amount again for the evacuation of the immovable property. Delivery of compensation: Mandatory cash compensation, as stipulated by the Expropriation Law, is provided by the responsible authority in accordance with the procedures specified therein. According to Article 8 of the Expropriation Law ("Purchase Method"), the administration is required to prepare the amount specified in the valuation report within forty-five days and request the property owner to transfer ownership rights to the administration on the date specified in the title deed. The expropriation fee is paid immediately upon the realisation of the rights transfer. Consequently, land entry occurs after the compensation has been deposited into the owners' account. Livelihood restoration and assistance: The Expropriation Law of Türkiye does not include specific provisions.	Please refer to "Eligibility" row. Compensation for Trees: The KGM 13th Regional Directorate does not consider orchard-based ("*kapama bahce*") valuation calculations, and instead, bases its reports on the unit values for trees declared by the Provincial and District Directorates of Agriculture and Forestry, while separately calculating the base (field) value of the land. KGM's 13th Regional Directorate applies a regional-directorate specific dense planting ("*sık dikim*") ratio when calculating compensation for trees. In this approach, if the total number of trees on a parcel, when divided by the expropriated area, exceeds a certain value, the compensation values obtained from the Provincial Directorate of Agriculture and Forestry is reduced. This results in a compensation gap that needs to be covered through the RAP (please see Section 6.3.3 for details). Compensation for Crops: There is no legal gap. In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is required by the SPV/EPC Contractor before the harvesting season concludes, KGM mandates that the SPV/EPC Contractor accessing the land provide compensation for the crops, in accordance with the Expropriation Law. Livelihood restoration and assistance: The Expropriation Law does not provide for livelihood restoration, assistance, or transitional support for formal or informal owners/users, except in cases of government-led resettlement. Loss of pastures or restrictions on access to resources are not compensated, and no assistance measures are provided to the affected people.	
Community Engagement	The client will engage with Affected Communities, including host communities,	The Expropriation Law requires the disclosure of information and official	The information disclosure and official notification process, as defined by the Law, is limited to	The SPV has developed and will implement a SEP in line with international standards.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	through the process of stakeholder engagement described in relevant performance standards. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the relevant international standards.	notification to affected owners and shareholders in accordance with regulatory procedures. Expropriation Law – **Article 8** ('Purchase Method') stipulates that owners must be notified by an official registered letter of the authority's intention to acquire, through negotiation, the immovable property, resource, or any easement rights thereon. Consultations are conducted as part of the negotiation meetings, which are held on the date determined by the commission, provided that the owner or their authorized representative is in attendance.	landowners and shareholders. There are no specific provisions or measures in place to address the needs of land users, vulnerable groups, or gender-related aspects in the design or implementation of information disclosure and consultation processes.	The Stakeholder Engagement Action Plan for RAP Disclosure and Implementation phases includes specific consultation approaches and communication tools designed to engage affected people effectively, including vulnerable people affected by Project's land acquisition process (see Section 10.3). Upon approval of this RAP by the Lenders, a Guide to Land Acquisition and Compensation (GLAC) will be prepared in both English and Turkish. The GLAC will provide a concise, clear, and non-technical summary of the RAP. Following its approval by the Lenders, the GLAC will be distributed to and presented to affected people. Please refer to Chapter 12 for specific provisions regarding engagement and information-sharing strategies, including tailored measures for vulnerable individuals. This chapter also outlines Project-specific actions undertaken to date, such as the establishment of a Project Information Office in Serik, the distribution of KGM's Booklet on Procedural Steps of Expropriation in Affected Settlements, and the recruitment of three Community Liaison Officers (CLOs) – two female and one male – in May 2025.
Grievance Mechanism	The client will establish a grievance mechanism consistent with relevant international standards as early as possible in the project development phase.	The Expropriation Law grants affected owners the right to object to the expropriation value. According to **Article 8**, if no agreement is reached or the deed of transfer is not provided during the negotiation meetings, proceedings shall be initiated in accordance with Article 10 of the Law. Formal correspondence: KGM collects land acquisition-related grievances and feedback from affected persons through official letters and petitions, and responds to them via formal correspondence. KGM website: KGM also provides a grievance form on its official website, which can be used by the public to submit concerns or feedback related to expropriation matters. Grievance and Feedback Form – KGM Website	The Expropriation Law and national legislation do not require the establishment of a project-specific grievance mechanism that meets the standards set by the international standards.	The SPV has developed, and will implement, a SEP, including a Project-specific grievance mechanism, in line with international standards. Please refer to Chapter 11 for the details of the grievance mechanism.

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		The Presidency's Communication Centre (CIMER): CIMER provides a centralized complaint mechanism for the public.		
Physical and Economic Displacement[56]	In the case of physical displacement, the client will develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of the relevant international standards regardless of the number of people affected. In the case of projects involving economic displacement only, the client will develop a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of the relevant international standards. Where a project results in both physical and economic displacement, the relevant requirements should be incorporated into the Resettlement Action Plan or Framework (i.e., there is **no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan**).	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a Resettlement Action Plan or Livelihood Restoration Plan, as mandated by relevant international standards.	The SPV has prepared a RAP in line with international standards, addressing both the physical and economic displacement impacts of the Project. The RAP will be implemented by the SPV in coordination with KGM, which is the designated authority responsible for carrying out expropriation in accordance with the Expropriation Law. The SPV will be responsible for the allocation and disbursement of the RAP Fund, which covers the implementation of RAP measures, including livelihood restoration, assistance to vulnerable individuals, compensation for informal users, as well as stakeholder engagement and monitoring activities.
Monitoring and Evaluation	The client will establish procedures to monitor and evaluate the implementation of a Resettlement Action Plan or Livelihood Restoration Plan and take corrective action as necessary. The extent of monitoring activities will be commensurate with the project's risks and impacts. For projects with significant involuntary resettlement risks, the client will retain competent resettlement professionals to provide advice on compliance with the relevant international standards and to verify the client's monitoring information. Affected persons will be consulted during the monitoring process.	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a Resettlement Action Plan or Livelihood Restoration Plan, including monitoring and evaluation provisions, as mandated by relevant international standards.	The SPV has prepared a RAP in line with international standards, including the monitoring and evaluation provisions. Please refer to Chapter 13 for the details of the internal and external RAP monitoring mechanisms, as well as the resettlement completion audit.

[56] Including the requirements under the Organisational Capacity and Commitment; Private-sector projects with government-managed land acquisition and resettlement; Physical Displacement and Economic Displacement and Livelihood).

Topic/Issue	Key Requirements of the International Standards	National Legislation and Institutional Practices (please refer to Appendix B for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Resettlement Completion Audit	Implementation of a Resettlement Action Plan or Livelihood Restoration Plan will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan as well as the objectives of the relevant international standards. The completion audit should be undertaken once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods. The completion audit will be undertaken by competent resettlement professionals once the agreed monitoring period is concluded.	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require a Resettlement Completion Audit in the context of project implementation.	The SPV has prepared a RAP in line with international standards. The RAP requires a resettlement completion audit to be conducted by qualified professionals once all mitigation measures have been substantially implemented, and the agreed RAP monitoring period has concluded.

5. Baseline Studies

5.1. Methodology of Baseline Surveys

The components of baseline investigations are summarised in Table 5-1. A combination of qualitative and quantitative methods are used, and the primary and secondary data have been evaluated together in the RAP.

Table 5-1. Baseline Survey Components

Phase	Scope	Date of Field Surveys
Scoping	• Desk-based review of the Expropriation Plans of the Project (including main Motorway and connection roads) • Methodology for RAP survey • Preparation of key-informant interview guides and questionnaires for household livelihood	April 2025
	• Field Survey for Identification of Users of Affected Lands (Private and Public) and Structures (by SPV's implementation partner)	17-25 April 2025

	• Resettlement-Scoping Field Visit
	  ○ Rapid key-informant interviews **(5 mukhtars)**
	  ○ Rapid interviews with physically displacement households (incl. households with vulnerable individuals) **(5 houses)**
	  ○ Rapid interviews with economically displacement households (affected greenhouses, fruit orchards and openyard agricultural fields) **(6 households)**
	• Rapid interviews with the affected business operators **(3 businesses)**
		28-30 April 2025

	• Preparation of RAP survey procedures, guides and questionnaires:
	  ○ Key-informant interview guides
	  ○ Household-level livelihood questionnaires
	  ○ Household-level physical displacement questionnaires
	  ○ Business interview questionnaires
		20 April – 9 May 2025

Field Surveys Phase 1 – by RAP Consultant Team	• Key-informant interviews with the heads of affected settlements[57]	12 – 30 May 2025 (completed)
	• Household-level physical displacement questionnaires (with the owners and/or users of affected houses)	
	• Household-level livelihoods questionnaires (with the owners and/or users of affected greenhouses, orchards and agricultural lands (open-field)	
	• Business interviews (with the owners and/or users of affected business structures)	
Field Surveys Phase 2 – by SPV's implementation partner	• Household-level physical displacement questionnaires (with the owners and/or users of affected houses) – **with the households not covered in the survey sample in Phase 1 to reach full census of affected houses** • Household-level questionnaires with greenhouses	May 2025 (completed)

[57] Settlements (neighbourhoods) with highest impact in terms of number and area of affected land and structures (houses, greenhouses, businesses) have been prioritised.

5.1.1. Desk-based Review

The documentation reviewed by the RAP Consultant as part of RAP scoping studies includes the following:

- Public benefit decision (*kamu yararı kararı*) and accelerated expropriation decision (*acele kamulaştırma kararı*) issued for the Project
- Final expropriation corridor
- Expropriation plans and lists (*kamulaştırma planı*) for the Motorway's expropriation corridor
- Land acquisition and land use permitting data for the Motorway's expropriation corridor
- Temporary construction site locations, land acquisition and permitting data
- Sample valuation reports for various types of affected parcels
- Documentation detailing the status of expropriation for each affected parcel (including information on any ongoing court cases, where applicable)
- Sample Article 8 notification letters issued by KGM to affected landowners and shareholders
- Relevant sections of the BOT contract outlining responsibilities related to expropriation (noting that KGM is the authorized administration responsible for land expropriation in accordance with the Turkish Expropriation Law – Law No. 2942, 1983)
- Preliminary Project Route and Justification Report (for the route between KM 52+000 to km 136+000) (*SPV, November 2024*) regarding design change and resettlement avoidance measures implemented by KGM or the Client
- Resettlement-related petititons received by KGM (from public) to date
- Report on identification of users of affected lands and structures, including contact details of affected people (*SURKAL, April 2025*)
- Corporate E&S policy, plans and procedures on stakeholder engagement and grievance mechanism (internal and external), gender equality and gender-based violence and harassment (GBVH)
- Relevant chapters of the ESIA and SEP – particularly those concerning Project description, analysis of alternatives, socio-economic baseline, vulnerable groups and individuals, E&S management system and stakeholder engagement (incl. grievance mechanism for public) (*April 2025*).

5.1.2. Resettlement-Scoping Field Visit

A **resettlement-scoping field visit** was conducted by the key experts of the RAP Consultant Team (see Table 5-2) on **28-30 April 2025** (for three full days). The purpose of the exercise was to assist in identifying the key social impacts and risks associated with land acquisition and physical and/or economic displacement, to establish the compensation strategy, and to inform the detailed resettlement planning process.

Table 5-2. Resettlement-Scoping Field Visit Team

Role	Party
Project Manager, Senior E&S Consultant	GEM
Agricultural Economist, Senior Expropriation and Valuation Expert, Certified Real Estate Valuation Expert	Third-party – Academician
Sociologist, Senior Social Specialist	Third-party
GIS Specialist	GEM
Expropriation Manager	SPV
Health and Safety Manager	SPV
Field Coordinator of Identification and Valuation Studies (conducted as per the Expropriation Law)	OGY

During the field visit, the team engaged with the relevant governmental organisation, the association of soilless greenhouses (Sera-bir), heads of selected neighbourhoods as well as the owners and – if known – users (formal or informal) of affected lands and structures, such as houses, greenhouses, and other businesses, on private and public lands (treasury and forest).

Due to the fact that the majority of the parcels to be expropriated within the Project area are agricultural lands, the District Directorates of Agriculture and Forestry in all three districts were visited. Information was exchanged on topics such as the general agricultural structure of the region, agricultural production along the project route, land ownership and usage, tenancy and sharecropping practices, key and alternative crops and livestock, agricultural subsidies, and marketing channels for agricultural products.

In addition, given the significant presence of greenhouses in the region, a meeting was held with, a Board Member of the Greenhouse Investors and Producers Association (Sera-bir). The association primarily represents large-scale greenhouse investors and does not cater to small-scale farmers engaged in greenhouse vegetable production. This is because Sera-bir members in the region are generally large-scale entrepreneurs predominantly involved in soilless greenhouse cultivation. Nevertheless, detailed information was gathered at the farmer level regarding the historical development of greenhousing in the region, average greenhouse sizes, and associated costs.

Additionally, as a farmer-based organization, the Alanya Chamber of Agriculture was intended to be visited; however, due to the remote location of the Chamber President, information was obtained via telephone.

In selecting the affected individuals for engagement, special consideration was given to the following groups:

- Parcels of private property with the largest expropriated area and highest expropriation ratio,
- Private property parcels where both land and residential buildings are subject to expropriation,
- Private property parcels where permanent fruit orchards are expropriated,
- Private property parcels where businesses are expropriated,
- Individuals occupying Treasury or unregistered lands whose residences or fruit orchards are expropriated (informal users),
- Parcels with the largest greenhouse area expropriated, whether on private property or Treasury land (informal users),
- Individuals whose residential buildings, fruit orchards, greenhouses, etc., located on forest or pastureland, are subject to expropriation (informal users),
- Parcels left with limited access due to expropriation,
- A parcel recently expropriated for the main construction camp site,
- Settlement heads (mukhtars) of the neighbourhoods where selected examples are located.

The list of meetings and consultations held by the RAP Consultant Team during the Resettlement-Scoping Field Visit is presented in Table 5-3.

Table 5-3. List of Meetings and Consultations held during Resettlement-Scoping Field Visit

No.	Stakeholder Group	Party	Consultee	Date
1.	Governmental organisation	KGM 13th (Antalya) Regional Directorate	Chief Engineer for Immovable Properties	28 April 2025
2.	Governmental organisation	Manavgat District Directorate for Agriculture	District Director	
3.	Governmental organisation	Alanya District Directorate for Agriculture	District Director and technical teams	
4.	Non-governmental organisation	Sera-Bir Association	Manager	
5.	Governmental organisation	Serik District Directorate for Agriculture	District Director and technical teams	29 April 2025
6.	Affected communities	Urundu, Serik Deniztepesi, Serik Yukariisiklar, Manavgat	Mukhtars	28-29 April 2025
7.	Affected houses	Deniztepesi, Serik Tasagil, Manavgat Bucakseyhler, Managat Turkler, Manavgat Emisbeleni, Alanya	1) Serik, Deniztepesi 139/6 – **private**: house owner on multiple shareholder private land, vulnerable HH 2) Serik, Sarıabalı 288/1 – **treasury**: multiple informal house owners, incl. vulnerable HHs 3) Manavgat, Taşağıl – **private**: 515/415 (owner on multishareholder-land) 4) Manavgat, Bucakşeyhler – **private**: 205/19 (partial expropriation – affected fruit orchard) 5) Manavgat, Türkler – **forestry**: OR-1 – multiple informal houses owners , incl. vulnerable HHs) 6) Alanya, Emişbeleni – **private**: 216/4 – renter	28-29-30 April 2025
8.	Affected greenhouses	Urundu, Serik Yukarisiklar, Manavgat Telatiye, Alanya	1) Serik, Üründü 117/4 – **GH owner and operator on private**: Partial expropriation (tomato) 2) Manavgat, Yukarıışıklar 172/1 – **formal renters (x2) – GH owner on private**: Partial expropriation (furit) 3) Alanya, Telatiye 127/48 – **GH owner and operator on private:** Partial expropriation (vegetables)	28-29 April 2025
9.	Affected agricultural lands	Urundu, Serik Bucakseyhler, Manavgat Cakallar, Alanya	1) Serik, Üründü – 117/5 **private**: orphan land + 35/6 **private** – cumulative Project impact 2) Manavgat, Bucakşeyhler – 205/19 **private**: partial expropriation – affected fruit orchard 3) Alanya, Çakallar – 134/10 **private**: GH operator in Incekum (mango)	29-30 April 2025
10	Governmental organisation	Alanya District Directorate for Agriculture	Technical teams	30 April 2025
11	Non-governmental organisation	Alanya Chamber of Agriculture	Chamber President	30 April 2025 (phone call)

5.1.3. RAP Field Surveys

The RAP field surveys were scheduled to be conducted in two campaigns, both of which were completed in May 2025. Table 5-4 summarises the design of the surveys.

5.1.3.1. Campaign 1 – RAP Surveys by RAP Consultant Team (May 2025)

The structure of the RAP Survey Team (Campaign 1) comprised both female and male surveyors, led by a senior sociologist and a senior field supervisor.

Sampling Methodology

Sampling was conducted based on the expropriation plans issued in May 2025. To ensure a statistically valid and representative sample, a stratified random sampling method was employed. The sampling strategy was carefully designed to reflect the diverse characteristics of the land parcels located across the Motorway's expropriation corridor, with particular consideration given to land use types and the presence of built structures.

Sampling Parameters

The sample size was calculated using the standard formula for estimating proportions in a finite population:

$n = (Z^2 \times p \times (1 - p)) / e^2$

Where:

Z = 1.96 (Z-score for 95% confidence level)
p = 0.5 (maximum variability)
e = 0.05 (margin of error)

Sampling Strategy: Stratified Random Sampling (Proportional Allocation)

The sampling frame was stratified based on three core dimensions:

0. Geographical Distribution:

- All neighbourhoods affected by Project-related land acquisition (across the Motorway's expropriation corridor) were included as strata.
- Parcels were proportionally sampled according to the number of parcels in each neighborhood.

2) Land Registry Type:

- Parcels with no potential for economic use (e.g. canals, roads,) were excluded from the sampling frame.

3) Presence of Structures:

Specific consideration was given to parcels with existing structures:

- Parcels with affected business structures
- Parcels with affected houses
- Parcels with affected greenhouses

To ensure full representation of affected businesses, all parcels with affected business structures were automatically included in the sample.

Non-Response Strategy: Replacement Sampling

Given the anticipated fieldwork challenges – such as absentee landowners and inaccessible parcels – a 1:1 replacement sampling strategy was implemented. For each parcel selected in the main sample, a corresponding reserve parcel was drawn from the same stratum, defined by both the neighbourhood and land registry type, to ensure consistency and representativeness.

The final sampling size outcome is presented in Table 5-4.

Within the scope of the surveys, the RAP field team completed a total of **385 questionnaires across 43 different settlements** along the Motorway's route. In addition, mukhtar (settlement head) interviews were conducted in **34 of these settlements**. A breakdown of the number of questionnaires administered to affected households (including those with affected residential structures and/or agricultural lands such as greenhouses), as well as affected businesses, is provided below in Table 5-5.

Table 5-4. RAP Survey Design

Method	Target Group	Baseline Data to be Collected	Strategy	Sample Size (Number of Interviews/Questionnaires)	
				Target	Achieved
Key-informant interviews	Heads (mukhtars) of affected settlements in the following neighbourhoods[58]	• General information on the settlement • Livelihoods and general economic conditions • Project awareness and perception • Project-related physical and economic displacement impacts in the settlement • Project-related displacement impacts on businesses in the settlement • Public lands affected by the Project • Vulnerability • Labour availability in the community	• Selection of settlements (neighbourhoods) with the highest impact – based on the number and area of affected land and structures (houses, greenhouses, businesses)	30 mukhtars	**34 mukhtars**
Household-level questionnaires – physical displacement	**Affected houses** • **Owners/shareholders** of the affected houses • **Formal and informal users** of the affected houses (if any) (including women and households with vulnerable individuals)	• Affected lands and tenure • Household composition and vulnerability • Living standards and livelihoods • Affected house and physical displacement related aspects • Agricultural land use • Relocation planning • Compensation and assistance (including livelihood) preferences and needs	• Campaign 1 (May 2025): Stratified random sampling • Campaign 2 (May 2025): Full census	Campaign 1: 24 parcels (with houses) Campaign 2: 100% excluding Campaign 1	**Total: 189 houses** Phase 1: **69 parcels with 99 households** (including greenhouses and open-field agricultural lands, when present on parcel containing house) Phase 2: **90 households**
Household-level livelihoods questionnaires – economic displacement	**Affected lands** • **Owners** of the affected agricultural lands (open-field), greenhouses, and orchards • **Formal and informal users** of the agricultural lands (open-field), greenhouses, and orchards (including women and households with vulnerable individuals)	• Affected lands and tenure • Household composition and vulnerability • Living standards and livelihoods • Agricultural land use • Compensation and assistance (including livelihood) preferences and needs	• Stratified random sampling	Campaign 1: ~300 parcels (greenhouses and open-field agricultural lands) Campaign 2: 100% excluding Campaign 1	**Total: 384 households** • Phase 1: **217 parcels – 217 households** • Phase 2**: 167 households**
Business Interviews	**Affected business structures** • **Owners** of the affected business structure (employers) • **Formal and informal users** (tenants) of the affected business structures (employers) (if any)	• General legal and economic information on business (including tenure, business activity, financial data) • Information on employees • Details on business operations (customers, key suppliers) • Project awareness and perception • Relocation planning • Compensation and assistance (including livelihood) preferences and needs	• Full census (100% of the businesses operating at the affected business structures)	22 parcels (with business structures): 100%	**Total: 32 businesses on 28 parcels** (including relocation and no relocation cases) • To be relocated: 23 businesses on 23 parcels • Non-operational: 2 businesses on 2 parcels • No relocation: 5 businesses on 5 parcels • To be relocated but not included in the expropriation plans as they are located: 2 businesses on 2 parcels

[58] Settlements (neighbourhoods) with highest impact in terms of number and area of affected land and structures (houses, greenhouses, businesses) have been prioritised.

Table 5-5. Distribution of Completed Questionnaires per Settlements – Campaign 1

No.	Neighbourhood	Number of Questionnaires				
		Affected House	Agricultural Land	Business	Total Number of Questionnaires	Total Number of Parcels
Serik district						
1	Aşağıçatma	2		2	4	2
2	Burmahancı		6		6	5
3	Cumalı	1	5	1	7	7
4	Çandır		1		1	1
5	Deniztepesi	1			1	1
6	Sarıabalı	12	13		25	24
7	Üründü	3	6		9	9
Serik Sub-total		**19**	**31**	**3**	**53**	**49**
Manavgat district						
8	Çakış	4	1	1	6	2
9	Taşağıl	13	14	1	28	18
10	Hocalar		11		11	11
11	Gündoğdu		1		1	1
12	Yavrudoğan	1	7		8	7
13	Çolaklı	3	4		7	7
14	Kalemler	1	12		13	13
15	Yeniköy		1		1	1
16	Şişeler	2	4	1	7	7
17	Evrenleryavşi		4		4	4
18	Yukarıışıklar	1	5		6	6
19	Dikmen		2		2	2
20	Evren		9	12	21	13
21	Seki	1	4		5	5
22	Bucakşeyhler		4		4	4
23	Ulukapı		1		1	1
24	Aşağıışıklar		8		8	8
25	Karaöz		2		2	2
26	Aksaz		3		3	3
27	Hacıali		2		2	2
28	Cevizler	1	1		2	2
29	Hacıisalı		8		8	8
30	Haciobasi	2	9	3	13	12
31	Uzunlar	4	6		10	10
32	Kadilar		5		5	5
33	Örenşehir	1	1		2	2
34	Yalçıdibi		10		10	10
35	Odaönü		2		2	2
36	Karakaya	3	6		9	9
Manavgat Sub-total		**37**	**147**	**18**	**201**	**177**
Alanya district						
37	Avsallar	2			2	2
38	Emişbeleni	8	5	7	20	18
39	Türkler	3	2		5	5
40	Toslak	16	12	1	28	25
41	Elikesik	1	3		4	4
42	Telatiye	6	1	6	15	10
43	Alara	7	16		29	22
Alanya Sub-total		**43**	**39**	**14**	**103**	**86**
Grand Total		**99**	**217**	**35**	**357**	**312**

5.1.3.2. Campaign 2 – RAP Surveys by SPV's Implementation Partner (May 2025)

In parallel with the Campaign 1 RAP surveys, the implementation partner of the SPV carried out Campaign 2 surveys targeting physically displaced households and affected greenhouses that were not covered within the RAP survey sample administered by the RAP Consultant Team. The objective of Campaign 2 was to ensure full census coverage of all affected houses and greenhouses.

Limitations arising from public hesitation to participate in the surveys were encountered in Telatiye, Toslak, and Elikesik, which hindered the achievement of full census coverage (noting that questionnaires with the households included in the RAP survey sample could be carried out as part of Campaign 1 – as outlined in the earlier section). The questionnaires that could not be completed during Campaign 2 will be finalised in the early stages of the RAP implementation period, as outlined in Section 5.1.3.3.

As Campaign 1 had already aimed to achieve a full census of affected businesses, these were not included in the scope of Campaign 2 surveys conducted by the SPV's RAP implementation partner.

The findings of the field surveys conducted as part of Campaign 2 will be compiled in a stand-alone report. Key findings and feedback of the PAPs, particularly on livelihood restoration and support measure preferences have been taken into consideration in the preparation of this RAP.

Table 5-6. Distribution of Completed Questionnaires per Settlements – Campaign 2

No	District	Neighbourhood	Distribution of Questionnaires	
			Affected House	Affected Greenhouse
1	Serik	Deniztepesi	1	3
2	Serik	Sarıabalı		12
3	Serik	Üründü	7	6
4	Serik	Burmahancı	1	3
5	Serik	Cumalı	1	1
6	Serik	Aşağıçatma	1	1
7	Manavgat	Çakış	7	3
8	Manavgat	Taşağıl	6	4
9	Manavgat	Hocalar	1	1
10	Manavgat	Yavrudoğan	1	1
11	Manavgat	Seki	3	1
12	Manavgat	Kalemler	5	9
13	Manavgat	Evren		2
14	Manavgat	Şişeler		2
15	Manavgat	Evrenleryavşi		1
16	Manavgat	Yukarıışıklar	10	4
17	Manavgat	Dikmen	1	1
18	Manavgat	Bucakşeyhler	2	
19	Manavgat	Ulukapı		1
20	Manavgat	Aşağıışıklar	1	2
21	Manavgat	Karaöz		2
22	Manavgat	Aksaz		2
23	Manavgat	Hacıisalı		1
24	Manavgat	Hacıobası	8	6
25	Manavgat	Uzunlar		3
26	Manavgat	Kadılar		1
27	Manavgat	Örenşehir	2	6
28	Manavgat	Yalçıdibi		4
29	Manavgat	Karakaya	10	16
30	Alanya	Alara	2	6
31	Alanya	Çakallar	2	
32	Alanya	Avsallar	1	
33	Alanya	Türkler		1
34	Alanya	Payallar		2
35	Alanya	Emişbeleni	8	39
36	Alanya	Toslak	8	13
37	Alanya	Elikesik	1	5
Total			**90**	**165**

5.1.3.3. Campaign 3 – RAP Implementation (after signing of the finance agreement for the Project)

This RAP draws on the surveys conducted during the RAP preparation stage, in accordance with the sampling methodology outlined above.

As part of the RAP implementation process, the sample-based surveys will be expanded to include all Project-affected households. In parallel, the Project RAP Implementation Team will establish and maintain a comprehensive, up-to-date socio-economic database of all individuals affected by Project-related land acquisition. This database will capture information on households with both formal and informal land users, as well as on vulnerable individuals, consistent with the data collected during the RAP preparation phase as outlined in the earlier sections.

As part of this scope, the SPV may engage third-party implementation partners to support the delivery of relevant services.

5.1.4. RAP Field Survey Limitations

Limitations encountered during the field surveys, along with the measures taken to address them, are summarised below:

- During the field surveys, several challenges were encountered related to community engagement, particularly in Alanya settlements. One of the main limitations was the widespread lack of information among community members regarding the Project's route, scope, and current status. Many residents reported that they had not received any **formal** communication about the Project and were unaware of how it would affect their properties or livelihoods. This information gap initially led to resistance toward the survey teams. In Telatiye, for example, a focused effort was made to spend extended time (up to two hours in some cases) engaging with residents to encourage participation.

  To address these challenges, the RAP field team employed targeted communication strategies aimed at building trust and delivering transparent, accurate information. Community members were informed that this engagement represented the first point of contact within the scope of an third-party study, and that communication would be progressively enhanced in the coming weeks and months as the Project advances. It was also explained that formal public consultation meetings would be organised, and that a Project-level grievance mechanism would be made available and clearly communicated to mukhtars and local residents.

  In addition, the RAP team clearly communicated their role, emphasising that they were not employees of the Project proponent, but independent third-party consultants responsible for collecting social data and ensuring that community perspectives were accurately captured and reflected in the RAP. The team explained the purpose and scope of the RAP, and informed participants that the surveys were being conducted specifically to support its development for the mitigation of impacts on affected communities.

  These proactive engagement efforts were instrumental in reducing initial resistance in most of the cases.

- The survey team provided interviewees with clear information about data protection and privacy safeguards in place during the surveys. They have also emphasised that participation is voluntary and that respondents are not obligated to answer all questions.

- As previously outlined in Section 3.5, the field identification studies in the Cakallar and Akdam neighbourhoods of the Alanya district have not been yet carried out by the engineering firm (valuation contractor) assigned to prepare the expropriation plans due to community hesitance. At the time of the surveys, the engagement between the SPV and the community is ongoing for the planning of future studies.

  Nevertheless, these settlements have been included in the survey sample. However, due to ongoing hesitance, the **Non-Response Strategy: Replacement Sampling** – as outlined in Section 5.1.3.1 – had to be applied to ensure coverage and data representativeness.

- Collection of financial data, both from the affected households and businesses, included challenges as common in social surveys in this type of agricultural geographies. Once initial trust was established, many participants became more forthcoming, expressing a willingness to share detailed information – especially when they understood that the study might bring potential benefits. However, this increased openness occasionally required moderation due to time constraints in the field.

  A recurrent challenge, common to rural socio-economic surveys, was the **inconsistency in income and expenditure reporting**. Many respondents tended to underreport income while overstating expenses, often driven by a perception that doing so may increase potential compensation or assistance. In several cases, participants claimed they could not estimate their income or daily earnings, citing irregularity or lack of record-keeping. To improve data quality, enumerators applied appropriate survey techniques to guide respondents. This included converting monthly data into annual figures or using known income sources such as pensions, social transfers, or seasonal employment to help participants recall and estimate household income more reliably. In cases where participants were unsure about the contribution of household members (e.g., members working in tourism), enumerators inquired further to distinguish between occasional and regular income.

  Ultimately, the collected data was reviewed and cross-checked by the RAP field team on a daily basis. A statistician was present on-site to carry out regular data entry and consistency checks. In cases where clear discrepancies or missing information were identified, respondents were recontacted to verify and confirm the data, ensuring accuracy and reliability in the final dataset.

- In several instances, residents expressed scepticism, believing that the team was merely conducting a public opinion poll. To address this misperception, the RAP team clearly emphasised that the survey was a technical and impact assessment related data collection exercise, designed to inform compensation, resettlement, and livelihood restoration strategies as part of RAP. The purpose and scope of the questionnaire – covering topics such as housing conditions, land ownership, relocation preferences, and vulnerability indicators – were explained in detail. This transparency helped build trust and encouraged greater openness and participation during the interviews.

- One of the key challenges encountered during fieldwork was the difficulty respondents faced in identifying their affected parcels to assess impact on total productive area and significance of loss – particularly when asked whether they owned any additional affected land. Many did not know or could not recall the official parcel numbers. To overcome this, the field team made extensive use of visual aids and digital tools to assist in land identification.

  The team routinely used laptops and parcel mapping systems. By entering the name of the neighbourhood into the cadastral database, they would navigate through local landmarks – such as local roads or cemeteries – until the respondent could visually identify their land. Once a parcel was identified, its official information was retrieved and cross-referenced with the Project's GIS-based expropriation database to determine whether it fell within the Motorway corridor and to what extent it would be affected.

  This process was lengthy and often required repetition, especially in cases where confusion had arisen due to previous Project alignment changes. Despite these difficulties, the field team took a participatory approach, often gathering groups of residents in informal village settings (such as coffee houses) to review parcel maps and verify ownership details collectively. In these settings, affected individuals were able to confirm parcel numbers and align them with the expropriation lists, enabling a more accurate data collection.

  The RAP field team prioritised individual interviews over group discussions to ensure the accuracy and independence of responses. It was observed that when interviews were conducted in groups, participants often influenced each other's answers, leading to repetition or alignment of views that may not have reflected individual realities. Therefore, interviews were arranged to be as private and separate as possible.

While the preference was for one-on-one interviews in isolated spaces, practical constraints such as limited venues in some settlements occasionally required simultaneous interviews in shared locations such as local coffee houses. In such cases, the team took care to seat interviewers at separate tables – ideally spaced at least 15 meters apart – and positioned some interviews outside, such as on benches or in nearby parks, to minimise cross-talk and ensure privacy.

In terms of scheduling, the team adapted to the local rhythms of daily life, intentionally avoiding visits during hours when residents were likely to be away for work or agricultural activities. The most productive interview window was between 7:00 PM and 9:00 – 10:00 PM, when residents had typically returned home, had dinner, and gathered in social spaces. These hours proved to be the most effective for establishing contact and conducting in-depth interviews in a comfortable and familiar setting for participants.

- When individuals had more than one parcel affected by the Project, they showed little interest in participating in multiple surveys. In such cases, the survey was conducted for the most significantly asset.
- The RAP field surveys identified the presence of small-scale local shops in Hacıobası, Manavgat, situated within the expropriated area of the existing state road D-695, as listed in Table 3.22. These shops are not included in the current Project's expropriation plans, as they are located on land previously expropriated by KGM. Consequently, they were not part of the original RAP survey sample. However, since they were identified during fieldwork, the survey team visited them separately and conducted interviews with selected shops to gain an overview of the potential impacts.
- Several multi-storey buildings were affected by the Project. Prior to the field surveys, there was no available information regarding the number of affected households within each building and storey. During the fieldwork, once these buildings were visited, the survey team adopted a replacement strategy and aimed to conduct questionnaires with all affected households within each identified building. As a result, some of the initially selected survey samples were replaced to accommodate this approach.

5.2. Socio-economic Baseline

5.2.1. Geographical Overview

The agricultural structure in districts crossed by the Antalya – Alanya Motorway is summarised in Table 5-7 based on key parameters.

Table 5-7. Agricultural Structure in Districts Along the Highway Route by Various Parameters

Parameters	Serik	Manavgat	Alanya
District Population (people)	143,435	262,576	361,873
Number of Farmers (people)	17,828	13,736	25,330
Greenhouse Production Area (decare)	54,160	35,327	25,980
Number of Livestock Enterprises	2,900	4,303	3,833
Number of Neighbourhoods	66	106	102

Source: *Western Mediterranean Development Agency, 2025. Current Situation Analysis of Antalya Serik District, https://baka.gov.tr/assets/upload/dosyalar/antalya-serik-mevcut-durum-analizi.pdf (Accessed: 18.05.2025)*
Manavgat District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (Unpublished), Antalya.
Alanya District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (Unpublished), Antalya.

Serik District

Located at the beginning of the route, Serik District lies 38 km east of Antalya. The Western Taurus Mountains are situated to the north of the district. With a coastline of approximately 22 km, the district center is located 8 km inland. Serik is partly established on undulating plains and has a total area of 1,200,000 decares[59]. Of this, 435,000 decares are agricultural land, 632,893 decares are forest and scrubland, and the remaining area is classified as unproductive land. Livestock and forestry are practiced in the mountainous areas, while crop production – especially greenhouse vegetable cultivation – is carried out in the plains. The Motorway route mainly passes through the plains area.

As of 2024, the district has an agricultural population of 56,000. The total number of registered agricultural enterprises is 17,828, of which 7,210 are greenhouse farming enterprises. Greenhouse production areas in the district have been increasing rapidly, with modern and controlled production practices in place. In agricultural production, the main sectors are greenhouse cultivation, open-field vegetable farming, fruit growing, and field crops (such as wheat, corn, and cotton). The most intensively cultivated greenhouse products in Serik are **tomatoes, strawberries, peppers, eggplants,** and **cucumbers**, respectively. For open-field vegetable farming, the leading products are **watermelon, pepper,** and **eggplant**.

Manavgat District

With an area of 2,283 km², Manavgat is the **largest** district of Antalya province. With a population exceeding 250,000, the developing district of Manavgat is established on the fertile plain of the same name, located on both sides of the Manavgat River. The district center is approximately 3.5 km from the Mediterranean coast. Situated on the delta of the Manavgat Plain, the district lies 75 km east of Antalya and 60 km west of Alanya[60].

The northern part of the district is covered with dense forests and surrounded by the scenic Taurus mountain range. The Manavgat River, known as Türkiye's most consistently flowing stream, runs through the Manavgat Plain, enriching the delta with fertility and productivity. A wide variety of **fruits, vegetables, grains, sesame,** and **flowers** are cultivated in this fertile plain. The most commonly produced greenhouse crops are tomatoes, peppers, cucumbers, and eggplants.

[59] Antalya-Serik District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (Unpublished), Antalya.
[60] Manavgat 2021 Economic Report, https://matso.tr/wp-content/uploads/2021-EKONOMIK-RAPOR-1-1.pdf, (Accessed: 18.05.2025)

Most people working in the tourism sector reside in Manavgat. With the growth of the tourism sector, the district centrE has expanded rapidly, and new settlements have been established. The Large Waterfall (*Büyük Şelale*) and Small Waterfall (*Küçük Şelale*) located on the Manavgat River are popular attractions visited by both domestic and international tourists. Side, Gündoğdu, Çolaklı, Evren, Kumköy, Ilıca, Titreyengöl, and Kızılağaç are Manavgat's popular tourism areas.

Of the total surface area of Manavgat District, 423,360 decares are agricultural land and 1,706,333 decares are forest and scrubland, with the remaining area classified as unproductive land. As of 2024, the district's total population is 262,576, of which 82,000 are engaged in agriculture. During meetings at the Manavgat District Directorate of Agriculture and Forestry, it was stated that there are 13,736 registered agricultural enterprises, nearly half of which are involved in greenhouse vegetable production. Approximately 65% of the agricultural land in the district is irrigated[61]. The total greenhouse area in the district is 35,327 decares, of which 13,987 decares are allocated to vegetable production. As of 2024, total vegetable production in the district amounts to 121,387 tons.

Alanya District

Alanya is located 135 km from the city center of Antalya, covering an area of 175,658 hectares. In the mountainous areas to the north, which are extensions of the Taurus Mountains, the elevation is around 1,000 meters. To the south lies the Alanya Peninsula, which is surrounded by 6,500 meters of city walls[62] (Yılmaz, 2019).

The total surface area of Alanya is 1,756,780 decares. Of this, 288,800 decares (16.45%) are agricultural land; 9,860 hectares (6.26%) are pasture and meadow; 115,013 hectares (65.48%) are scrubland and forest; 185 hectares (0.10%) are water surfaces; and 20,560 hectares (11.70%) consist of non-agricultural areas and residential zones[63]. Thanks to its climate and geographical location, the region possesses some of the most fertile lands in the Mediterranean region, allowing for a wide variety of plant species to be cultivated. In Alanya, 66% of the agricultural land is actively irrigated[64].

In Alanya district, 17,180 decares of the total 25,980 decares of greenhouse area are allocated to **vegetable production**. As of 2024, total vegetable production in the district amounts to 258,657 tons.

[61] Manavgat District Directorate of Agriculture and Forestry, 2025. Agricultural production data (Unpublished), Antalya.

[62] Yılmaz, E. (2019). Identification of problematic weeds in banana (*Musa cavendishii Lam. ex Payton*) production areas in Antalya Province and determination of the allelopathic potential of banana extracts (Unpublished master's thesis) (Unpublished master's thesis). "*Antalya ilinde muz (Musa cavendishii Lam. ex Payton) üretim alanlarında sorun olan yabancı otlar ve muz ekstraktlarının allelopatik potansiyelinin belirlenmesi*" – Tokat Gaziosmanpaşa University, Institute of Science, Department of Plant Protection.

[63] Alanya City Council, 2025 – Geographical Location. https://alanyakentkonseyi.org.tr/S/56/Cografi-Konu (Accessed: May 18, 2025).

[64] Alanya District Directorate of Agriculture and Forestry, 2025. Agricultural production data (Unpublished), Antalya.

5.2.2. Administrative Organisation

Antalya is a metropolitan municipality in Türkiye. It was first designated as a metropolitan municipality in 1993, but a major administrative change took place with the enactment of **Law No. 6360 in December 2012**.

Law No. 6360 expanded the boundaries of metropolitan municipalities like Antalya to cover the entire province and mandated a significant change in local governance and administrative units.

Consequently all villages ("*köy*") and towns ("*belde*") within Antalya's provincial borders were officially reclassified as neighbourhoods ("*mahalle*, both administratively and legally). This reclassification became effective after the local elections on 30 March 2014, when Law No. 6360 was fully implemented. Since that date, the traditional population-based distinction (such as the "under 2,000" rule for village status) no longer applies in Antalya.

Regardless of their population size or rural characteristics, every settlement in Antalya is now legally a neighbourhood. On the other hand, in practice and in everyday language, the rural way of life, identity, and usage of the term "*village*" continue. In daily life and cultural practice, people may still refer to these places as villages, and rural lifestyles persist. But from a legal-administrative point of view under metropolitan governance, all settlements – regardless of their population – are now "neighbourhoods".

5.2.3. Affected Settlements

The baseline socio-economic conditions in the affected districts and settlements have been characterised using information gathered from interviews conducted with mukhtars (settlement heads) in 34 settlements along the project route, as presented in the following sub-sections.

The affected settlements exhibit diverse socio-economic and spatial characteristics. To better understand and evaluate the resettlement dynamics, a multidimensional categorisation approach was adopted. All settlements affected by Project's land acquisition within Motorway's expropriation corridor were assessed using a set of indicators that reflect varying aspects including settlement structure and livelihood patterns.

The categorisation was based on the following indicators and corresponding typologies:

- **Population Size:** Settlements are classified as small, medium, or large according to total population.
- **Primary Livelihood Sources:** Settlements are categorised based on predominant means of income, such as agriculture or tourism.
- **Demographic Profile:** Communities are analysed with attention to their age structure (e.g., aging population, youth-dominated villages).
- **Proximity to Major Centres:** Settlements are categorised as:
    - Settlement near urban centre: located close to the city centre and benefits from greater accessibility to services and markets.
    - Remote/isolated settlement: situated in geographically remote or hard-to-reach areas.
    - Village on the D400 highway corridor: located directly along the existing D400 state-road corridor, which serves as a major regional route. Proximity to this road shapes livelihood.

5.2.3.1. Population of Neighbourhoods

Population figures as taken from Turkish Statistical Institute (TURKSTAT) statistics highlight Antalya neighbourhoods' diverse demographic structure, with marked differences between districts. While some villages, especially in Alanya, are exceptionally large and increase the mean and variability, others demonstrate relatively compact and uniform population sizes.

Table 5-8 shows the population of the affected settlements. The population of the neighbourhoods ranges widely, from as few as 173 (Kadılar, Manavgat) inhabitants to as many as 17,927 (Telatiye, Alanya).

Table 5-8. Population of Affected Settlements

Neighbourhood	Population	Neighbourhood	Population
Serik district		Manavgat district	
Deniztepesi	982	Cakis	1,818
Sariabali	1,117	Tasagil	4,813
Yukarikocayatak	4,293	Gundogdu	2,158
Asagikocayatak	1,393	Hocalar	477
Kayaburnu	983	Yavrudogan	1,853
Candir	1,819	Colakli	7,513
Asagicatma	204	Seki and Evren	3,756
Cumali	2,011	Kalemler	341
Burmahanci	1,193	Evren	3,756
Urundu	889	Ilica	13,689
Belpinari	946	Yenikoy	763
Alanya district		Siseler	236
Alara	624	Evrenleryahsi	443
Cakallar	599	Dolbazlar	665
Incekum	3,361	Yukariisiklar	888
Avsallar	16,118	Dikmen	1,261
Akdam	1,393	Bucakseyhler	737
Turkler	4,949	Ulukapi	3,797
Payallar	10,391	Asagisiklar	1,595
Emisbeleni	1,607	Demirciler	1,566
Toslak	3,722	Karaoz	1,102
Telatiye	17,927	Aksaz	786
		Haciali	332
		Cevizler	242
		Sulek	1,162
		Haciisali	364
		Haciobası	581
		Uzunlar	348
		Kadilar	173
		Orensehir	998
		Yalcidibi	224
		Odaonu	308
		Karakaya	452

Source: TURKSTAT, 2024.

Descriptive statistics for the settlements in Antalya province, as well as for the districts of Alanya, Manavgat, and Serik, reveal notable differences in population size and distribution as shown in Table 5-9. The average population across all settlements is approximately 2,450, but the standard deviation is quite high (3,788), indicating considerable variation and the existence of some exceptionally large settlements.

Table 5-9. Population of the Neighbourhoods

Location	N	Minimum	Maximum	Mean	Standard Deviation
All affected neighbourhoods	55	173	17,927	2,450.09	3,788.259
Alanya	12	581	17,927	5,290.33	6,130.641
Manavgat	32	173	13,689	1,732.53	2,698.399
Serik	11	204	4,293	1,439.09	1,061.639

Settlements with populations below 1,000 typically have smaller and more homogeneous structures, while those with 1,000 – 4,999 residents represent medium-sized settlements with more diverse social and economic profiles. Settlements with populations of 5,000 or more often exhibit semi-urban characteristics and stand out as larger settlements with different service and management requirements.

- **Small village** : 0 to 999,
- **Medium-size village** : 1,000 to 4,999,
- **Large village** : 5,000 and above.

The distribution of the settlements by size is presented in Table 5-10. The table shows that **medium-size** neighbourhoods make up the majority in Alanya, while Manavgat and Serik are characterised by a high share of small neighborhood. Large neighbourhoods are rare across all districts, with only one case each in Alanya (Telatiye) and Manavgat (Çolaklı), and none in Serik. This distribution highlights the predominantly small and medium-scale rural settlement pattern in the region, with only a few exceptions showing semi-urban characteristics.

Table 5-10. Distribution of Settlements according to their Size

District	Settlement Size		
	Large	Medium	Small
Alanya	1	4	1
	Telatiye (Konaklı)	Elikesik, Toslak, Türkler, Emişbeleni	Alara
Manavgat	1	7	14
	Çolaklı	Evren, Taşağıl	Aksaz, Aşağıışıklar, Bucakşeyhler, Çakış, Dikmen, Evrenleryavşı, Hacıali, Hacıisalı, Hacıobası, Hocalar, Kadılar, Kalemler, Karakaya, Karaöz, Şişeler, Uzunlar, Yalçıdibi, Yavrudoğan, Yukarıışıklar
Serik	0	3	3
	-	Burmahancı, Sarıabalı, Cumalı	Aşağıçatma, Deniztepesi, Üründü

5.2.3.2. Population Growth Trends

Table 5-11 presents the results from the 34 interviews conducted with neighbourhood mukhtars, which reveal that the great majority (**70.6%**) have experienced an **increase** in population. A smaller proportion of settlements reported no significant change in their population size (**17.6%**), while only a minority (**11.8%**) indicated a population decrease. This suggests that, overall, the area is characterised by positive demographic growth, which may reflect factors such as rural attractiveness, migration dynamics, or local development initiatives. The low percentage of villages experiencing depopulation points to a generally stable or expanding rural population structure in the surveyed region.

Population growth in the neighbourhoods is largely explained by a combination of internal migration, the construction of new residential units, the settlement of seasonal and second-home owners, local natural increase, and the attraction of workers to agricultural and tourism sectors. Only a few neighbourhoods reported population stability or decline, often linked to limited economic opportunities or out-migration of youth.

Table 5-11. Population Changes in the Neighbourhoods in the Last Five Years

Population Change	Count	Percentage	Settlements
Unchanged	6	17.6%	**Serik:** Cumalı, Sarıabalı **Manavgat:** Aşağıışıklar, Hacıali, Kalemler, Yalçıdibi
Decreased	4	11.8%	**Manavgat:** Evrenleryavşi, Hocalar, Kadılar, Uzunlar
Increased	24	70.6%	**Serik**: Aşağıçatma, Burmahancı, Deniztepesi, Üründü **Manavgat**: Aksaz, Bucakşeyhler, Çakış Çolaklı, Dikmen, Evren, Hacıisalı, Hacıobası, Karakaya, Karaöz, Şişeler, Taşağıl, Yavrudoğan, Yukarıışıklar **Alanya:** Alara, Elikesik, Emişbeleni, Telatiye, Toslak, Türkler

Analysing the statements obtained from mukhtar interviews, the main drivers of population increase in the neighbourhoods can be grouped as follows:

- **In-migration and Return Migration:** Several neighbourhoods have experienced an influx of new residents, including both internal migrants and those returning from cities – particularly after the pandemic. In some cases, there is mention of returnees from urban areas, foreign nationals (e.g., German and Russian households), and families seeking a quieter or more rural life.
- **Attraction of Seasonal and Second Homeowners:** The construction of summer houses and new residential complexes (including TOKİ[65] housing and sites) has contributed notably to population growth. There is a rising trend of seasonal or secondary residence, both among domestic and some international buyers. This pattern has been particularly strong post-pandemic, with many families opting for more spacious, rural or coastal settings.
- **Local Demographic Dynamics:** Natural population growth through marriage and births, as well as the retention of younger residents who choose to stay rather than move elsewhere, also contribute to the increase. In several areas, it is specifically noted that there is no out-migration, and youth are remaining in the locality.
- **Economic and Employment Opportunities**: The arrival of residents engaged in agricultural activities – such as greenhouse operators – or those working seasonally (e.g. daily wage labourers, hotel staff) is another significant driver. The development of tourism has led, in some cases, to a sharp rise in population over the summer, with temporary or permanent settlement by workers and entrepreneurs.
- **Urban and Infrastructure Developments:** New housing projects, including apartment complexes and sites, have facilitated inward migration, particularly where new zoning has been introduced.

In some cases, exceptions are noted; for example, population increases resulting from new construction have been offset by migration prompted by forest fires or other adverse events.

[65] TOKİ is Turkey's Mass Housing Administration, known for building affordable housing.

5.2.3.3. Demographic Profile: Age

The mean and median ages according to districts is presented in Table 5-12. The demographic data indicates that the population across the surveyed districts is relatively mature. The overall mean age is **44.2**, while the median age stands at **48.5**, suggesting a slight skew towards older age groups. When disaggregated by district, **Manavgat** has both the highest mean (45.8) and median (51.5) ages among the three, pointing to an **older** resident base compared to Alanya (mean: 41.9; median: 45.0) and Serik (mean: 41.1; median: 47.0). The consistently high median ages across all districts highlight the prevalence of **middle-aged and older adults** in the population, which has implications for community needs, service provision, and future demographic trends.

Table 5-12. Mean and Median Ages according to Districts

District	Mean Age	Median Age
Alanya	41.9	45.0
Manavgat	45.8	51.5
Serik	41.1	47.0

There is a clear relationship between settlement size and the age structure of the population. As shown in Table 5-13, as the size of the settlement decreases, both the mean and median ages rise significantly. Large neighbourhoods have the youngest population profile, with a mean age of 35.3 and a median age of 31.0. **Medium-sized** and **small** neighbourhoods display an increasingly aging population. In particular, small neighbourhoods have the highest mean (50.6) and median (58.0) ages, indicating a predominantly **older** demographic.

This trend suggests that **smaller** neighbourhoods are experiencing population **aging**, likely due to youth **out-migration** and **lower birth rates**. In contrast, **larger** neighbourhoods tend to retain or attract more **young** individuals and families.

Table 5-13. Mean and Median Ages of the Neighbourhoods According to Size of the Settlement

Settlement Size	Mean Age	Median Age
Large	35.3	31.0
Medium	47.6	51.0
Small	50.6	58.0

5.2.3.4. Typology by Proximity to Major Centres

Neighbourhoods surveyed as part of the RAP study can be categorised by their proximity to urban centres and their situational context relative to major transportation routes. This classification provides insights into their accessibility, socio-economic potential, and likely infrastructural challenges.

- **Neighbourhoods near Urban Centres:** These neighbourhoods benefit from proximity to city centres, offering greater accessibility to essential services, markets, and amenities. Only a limited number of neighbourhoods fall within this category.
- **Remote/Isolated neighbourhoods:** Remote neighbourhoods are characterised by their distance from urban centres and major transportation corridors, often leading to challenges in accessing public services and markets. These constitute the majority of neighbourhoods listed, particularly in Manavgat and Serik, including all other Manavgat and Serik neighbourhoods not explicitly classified as “highway corridor” or “near urban center” (for example, Serik Aşağıçatma, Üründü, Manavgat: Kadılar, Yalçıdibi, etc.)
- **Neighborhoods on the Highway Corridor:** These neighbourhoods are directly situated along the D400 (or, for Hacıobası, D950) state road corridor, a key regional artery. Their location offers strategic advantages in terms of trade, mobility, and economic opportunities, often shaping household livelihoods towards activities benefiting from transit and connectivity.

Classification of neighbourhoods by proximity to urban centres is presented in Table 5-14. Notably, most of the affected neighbourhoods are classified as remote/isolated, especially in Manavgat and Serik districts. Neighborhoods located directly on the highway corridor are relatively fewer, but likely have higher connectivity and economic dynamism. Near-urban centre neighbourhoods are the least common

Table 5-14. Classification of Neighbourhoods by Proximity to Urban Centres

Neighbourhood	Classification by Proximity	Neighbourhood	Classification by Proximity
Serik district		Manavgat district	
Deniztepesi	Remote	Cakis	Remote
Sariabali	Remote	Tasagil	Remote
Yukarikocayatak	Remote	Gundogdu	Highway corridor
Asagikocayatak	Remote	Hocalar	Remote
Kayaburnu	Highway corridor	Yavrudogan	Remote
Candir	Remote	Colakli	Highway corridor
Asagicatma	Remote	Seki	Near urban centre
Cumali	Highway corridor	Kalemler	Remote
Burmahanci	Remote	Evren	Near urban centre
Urundu	Remote	Ilica	Highway corridor
Belpinari	Remote	Yenikoy	Remote
Alanya district		Siseler	Remote
Alara	Remote	Evrenleryahsi	Remote
Cakallar	Remote	Dolbazlar	Remote
Incekum	Highway corridor	Yukariisiklar	Remote
Avsallar	Highway corridor	Dikmen	Remote
Akdam	Remote	Bucakseyhler	Remote
Turkler	Highway corridor	Ulukapi	Remote
Payallar	Highway corridor	Asagisiklar	Remote
Elikesik	Highway corridor	Demirciler	Remote
Emisbeleni	Remote	Karaoz	Remote
Toslak	Highway corridor	Aksaz	Remote
Telatiye	Highway corridor	Haciali	Remote
		Cevizler	Remote
		Sulek	Remote
		Haciisali	Remote
		Haciobası	Highway corridor
		Uzunlar	Remote
		Kadilar	Remote
		Orensehir	Remote
		Yalcidibi	Remote
		Odaonu	Remote
		Karakaya	Remote

5.2.3.5. Livelihood Sources

The following sub-sections present the categorisation of affected settlements based on their predominant sources of livelihood.

5.2.3.5.1. Agriculture

An overview of the agricultural activities in the region was previously provided in Section 5.2.1 The interviews with mukhtars reveal that agriculture is the most important economic activity in all affected neighbourhoods.

The main agricultural products reported by the mukhtars are listed in Table 5-15. Local economies rely on a wide range of products, including vegetables, fruits and field crops, reflecting both the region's agricultural richness and its resilience to market or climate fluctuations.

Table 5-15. Main Agricultural Products in Affected Settlements

Fruits	Vegetables	Field Crops
Banana (55.9%)	Tomato (44.1%)	Wheat (23.5%)
Melon/Watermelon (52.9%)	Paprika (38.2%)	Sesame (20.6%)
Olive (38.2%)	Cucumber (23.5%)	Peanut (17.6%)
Citrus (38.2%)	Eggplant (14.7%)	Maize (14.7%)
Avocado (26.5%)	Zucchini (5.9%)	Cotton (8.8%)

Key informant interviews with mukhtars indicate that greenhouse cultivation plays a significant role in the region's agricultural production. In many settlements, greenhouse cultivation is common or rapidly expanding, especially since 2020. In certain settlements, many farmers own a greenhouse, and, in some instances, greenhouses from the same community extend into neighbouring settlements. The initial investment is considered high, making greenhouse farming difficult for first-timers or smallholders; however, those who successfully start tend to continue. For some, the high costs and riskiness of entry deter more rapid expansion.

When the mukhtars were asked what percentage of their total agricultural output is gathered from greenhouses, the average proportion of crops produced in greenhouses is **38.8%.** While some farms rely minimally on greenhouses, others gather up to 90% of their products from such facilities. Reported values span from as little as 1% to as much as 90%, highlighting a wide spectrum in the reliance on greenhouses. The spread of greenhouses is closely connected to the commercialization and professionalization of agriculture.

There is a clear focus on high-value and exotic crops such as banana, dragon fruit, and avocado, driven by strong market demand and high-profit potential. It is noted that there is a growing trend toward monoculture –particularly with banana greenhouses.

Table 5-16 presents the greenhouse-based agricultural output rates reported by the mukhtars.

Table 5-16. Greenhouse-based Agricultural Output

District	Average
Alanya	76.67
Manavgat	22.70
Serik	62.50

While greenhouse farming is dominant or rapidly growing in some settlements, in others it has yet to become widespread, primarily due to cost barriers or risk aversion. In areas where greenhouse farming lags, traditional open-field crops are still common, but there is general awareness of the growing importance and profitability of protected cultivation.

5.2.3.5.2. Livestock (Animal Husbandry) Activities

The area is predominantly populated by "*Yörüks*" – a Turkish cultural group with roots in pastoral nomadism. This traditional Turkish community was once known for their mobile, pastoralist lifestyle, relying heavily on sheep and goat herding. Although most *Yörüks* are no longer pastoral nomads and now live settled lives, their cultural identity and local traditions are still closely tied to animal husbandry.

Muhtars' responses reveal that animal husbandry, though still regarded as important by many, is **in decline within the the affected settlements.** This is mainly because the traditional family structure that enabled collective livestock management is eroding as family sizes decrease and younger generations pursue urban or alternative employment. The transition from nomadism to a settled lifestyle has not eliminated animal husbandry, but has made its traditional, labour-intensive forms less sustainable.

The significance of animal husbandry as a livelihoods source in affected settlements in summarised in Table 5-17.

Table 5-17. Significance of Animal Husbandry as a Livelihoods Source in Affected Settlements

Significance Level	Count	Percentage	Settlements
Very significant	8	23.53 %	**Serik:** Deniztepesi **Manavgat:** Bucakşeyhler, Evren, Hacıisalı, Hacıobası, Kadılar, Kalemler, Karakaya
Significant	12	35.29 %	**Serik**: Üründü **Manavgat:** Aksaz, Aşağıışıklar, Hocalar, Karaöz, Uzunlar, Yavrudoğan, Yukarıışıklar **Alanya:** Elikesik, Emişbeleni, Toslak, Türkler
Average	7	20.59 %	**Serik:** Aşağıçatma, Burmahancı **Manavgat:** Çakış, Hacıali, Taşağıl, Yalçıdibi **Alanya:** Alara
Marginal	7	20.59 %	**Serik:** Cumalı, Sarıabalı **Manavgat:** Çolaklı, Dikmen, Evrenleryavşı, Şişeler **Alanya:** Telatiye

In Alanya, animal husbandry maintains a respectable presence in community life, with the majority of respondents (57%) describing its importance as "significant." However, it's notable that none characterized it as "very significant." This pattern suggests that while livestock remains relevant for many families, it may be increasingly overshadowed by other economic activities or modern lifestyles. The traditional centrality of animal husbandry appears to be giving way to diversification and new sources of income.

In Manavgat, animal husbandry's strong cultural and economic roots persist. Two-thirds of respondents (66%) view livestock activities as either "significant" or "very important," reflecting both the enduring influence of *Yörük* traditions and a community still closely tied to animal production. Unlike in Alanya or Serik, animal husbandry remains woven into the fabric of everyday life, continuing to anchor family economies and social rhythms.

The case of Serik is more starkly different. Most respondents from Serik (over 66%) now see animal husbandry as either "average" in significance or "marginal." Only a small fraction continue to view it as central. This shift likely stems from both demographic changes and evolving aspirations, such as shrinking family sizes, urban migration, and the pursuit of alternative livelihoods. The traditionally collective and labour-intensive model of animal husbandry practiced by *Yörük* families is increasingly difficult to sustain in this district.

While livestock farming is present within the region, the pattern that emerges from the data is one of striking unevenness. Among the 34 mukhtars interviewed, the average number of cattle per neighbourhood is about 303: the minimum recorded is zero, while the maximum is an extraordinary 5,000, as summarised in Table 5-18. These extremes suggest a landscape where cattle ranching ranges from completely absent in some neighbourhoods to highly concentrated in just a few. The moderate standard deviation (about 55) points to a certain degree of consistency for most neighbourhoods, but it is also clear that the presence of one very large-scale operation is pulling the average upwards.

Table 5-18. Number of Cattle Per Neighbourhood

Value	Count
Mean	302.68
Standard deviation	54.74
Minimum	0
Maximum	5,000

In essence, cattle farming is far from being a universal or equal contributor to the local economy. In many communities, it may be a marginal sideline or altogether absent, while in others – perhaps those with more resources, favourable conditions, or greater tradition – cattle numbers soar into the thousands.

A breakdown of cattle numbers by district underscores the unevenness in livestock distribution within the region:

Table 5-19. Crosstabulation with District

District	Count	Mean	Minimum	Maximum
Alanya	7	246.29	10	1,000
Manavgat	21	375.24	5	5,000
Serik	6	114.5	0	300

Manavgat emerges as the only district with very large cattle operations, with one neighbourhood (Evren, Manavgat) reporting up to 5,000 head of cattle. It also has the highest mean number of cattle (375), reflecting the presence of both large herds and more conventional-scale operations. Alanya neighbourhoods display a moderately sized cattle sector, averaging about 246 cattle, with a ceiling of 1,000. Serik stands out for its relatively limited engagement with cattle farming, with an average of just 115 head and most neighbourhoods reporting substantially fewer cattle; in fact, the minimum is zero, indicating that the practice is absent in some localities.

These findings underscore not only the general unevenness of cattle ranching across the region, but also significant spatial variations between districts. While cattle farming is a notable presence in certain parts of Manavgat and (to a lesser extent) Alanya, it remains marginal in Serik. This pattern may reflect differences in land availability, historical patterns, market connectivity, or support infrastructure.

According to mukhtars, based on their local knowledge, rather than from direct household surveys, the average number of sheep per village is around 755, with reported figures ranging from 0 up to 2,500 sheep. The standard deviation is quite high (717), indicating considerable variation between villages – while some have no active sheep herding, others maintain sizable flocks.

Table 5-20. Number of Sheep Per Neighbourhood

Value	Count
Mean	755.38
Standard deviation	717.32
Minimum	0
Maximum	2,500

This variability suggests a diverse pattern: in a number of neighbourhoods, sheep husbandry continues to play a significant role in local livelihoods, while in others, it may have nearly vanished. The existence of both low and high numbers reflects broader trends such as demographic changes, shifts in land use, and differing levels of engagement in traditional pastoralism.

Despite a moderate standard deviation (about 55), the extreme maximum value means that, **for the majority of neighbourhoods, sheep herding is much smaller in scale – or entirely absent.**

However, it is important to note that beyond statistics, sheep occupy a significant place in the traditional life and identity of local people, especially for those of *Yörük* heritage. It is not only an economic pursuit but a marker of cultural continuity, identity, and social memory. Even in neighbourhoods where sheep numbers are low today, their historical and cultural resonance remains strong.

Table 5-21. Sheep Ownership Across Districts

District	Count	Mean	Minimum	Maximum
Alanya	7	979.86	60	2,000
Manavgat	21	809.48	4	2,500
Serik	6	304.17	0	1,000

In Alanya, sheep flocks continue to mark the rural landscape with a sense of vitality and tradition. Muhtars from seven villages describe sizable herds, with the average village counting nearly 1,000 sheep. The smallest flock reported is 60, while the largest reaches an impressive 2,000 animals. This suggests that, for most rural communities in Alanya, sheep herding is not just a legacy but an ongoing, robust practice – one that likely continues to shape local rhythms, economies, and social ties. Moving to Manavgat, the picture becomes more diverse. Out of 21 villages surveyed, some uphold the old ways with herds as large as 2,500 sheep, while others have dwindled to just a handful – sometimes as few as four animals. Still, the average herd size remains strong at over 800 sheep per village. This broad range reveals a district in transition: some villages have managed to preserve or even expand their flocks, while others are seeing sheep herding wane, possibly in response to migration, ageing populations, or changing economic opportunities. In Serik, meanwhile, sheep husbandry appears to be losing its foothold. Here, across six villages, the average flock size drops to about 300, and some mukhtars report no sheep at all. The largest flock, at 1,000 sheep, pales in comparison to the district highs of Alanya and Manavgat. The data suggests that in Serik, traditional animal husbandry now plays a much smaller role – perhaps overtaken by other forms of agriculture, or reflecting demographic and economic shifts unique to the area.

5.2.3.5.3. Employment in Industry

As presented in Table 5-22, the data suggests that employment in industry holds a relatively modest place in the local economic landscape.

While a small number of respondents consider industry “very important” (2 out of 34, about 6%; Deniztepesi, Serik and Hacıisalı, Manavgat) or “significant” (3 out of 34, nearly 9%; Evrenseki, Hocalar and Karakaya, Manavgat) for employment, the great majority view its role as more limited. Taken together, these results reveal that while industrial employment exists, its significance varies widely – and, for most, it does not represent a major source of economic security or opportunity. Instead, the industrial sector appears to play a supporting, rather than leading, role in shaping local livelihoods.

Table 5-22. Significance of Employment in Industry

Significance Level	Count	Percentage
Very significant	2	5.88
Significant	3	8.82
Marginal	10	29.41
Inexistent	2	5.88
Average	17	50.0

5.2.3.5.4. Government Employment

Government employment occupies a varied but notable position within the local economy. As given in Table 5-23, according to the data, about 29% of respondents describe government jobs as “average” in importance. An equal proportion perceives government employment as “significant,” highlighting its particular value, perhaps as a reliable source of income or social stability for a portion of the population.

Table 5-23. Significance of Government Employment

Significance Level	Count	Percentage
Average	10	29.41
Significant	10	29.41
Marginal	9	26.47
Inexistent	5	14.71

5.2.3.5.5. Trade

As shown in Table 5-24, employment in trade and other small local businesses plays a meaningful role in the economic life of the surveyed communities. According to the data, a combined majority of mukhtars (about 53%) consider this sector to be either “significant” or “very important” for local livelihoods. This suggests that commerce, shops, markets, and small enterprises contribute substantially to household income and economic vitality for many.

Table 5-24. Significance of Employment in Trade and Other Local Small Businesses

Significance Level	Count	Percentage
Very significant	6	17.65
Significant	12	35.29
Marginal	6	17.65
Average	8	23.53
Inexistent	2	5.88

5.2.3.5.6. Pensions

Pensions play a highly significant role in the economic fabric of the surveyed communities. According to the findings as summarised in Table 5-25, nearly two-thirds of respondents (almost 65%) consider pension income to be a significant contributor to household and community livelihoods.

Table 5-25. Significance of Pensions

Significance Level	Count	Percentage
Significant	22	64.71
Average	9	26.47
Marginal	3	8.82

Approximately a quarter of respondents rate pensions as of average importance, suggesting that, while pensions are present and helpful, they are not always the mainstay of household income for everyone.

A smaller minority (about 9%) – Alara, Çolaklı, and Evren – consider pension income as marginal to local economic life, perhaps in communities with younger populations or more diverse employment options.

5.2.3.5.7. Tourism

Tourism plays a prominent role in local employment. As given in Table 5-26, nearly half of respondents consider it "very important" for livelihoods, while a substantial segment rates it as "significant." Only a small minority regard the sector's importance as "marginal" or "average." This pattern highlights that, in many communities, tourism is viewed as a major driver of economic activity and employment, rather than a peripheral or incidental resource.

Table 5-26. Significance level of Employment in Tourism

Signifiance Level	Count	Percentage
Very important	15	44.12
Significant	13	38.24
Marginal	3	8.82
Average	3	8.82

This distribution suggests that, across the affected area, tourism is widely acknowledged as a core source of income for households and communities, maintaining a central place in local economic dynamics. In numerous settlements, mukhtars reported that nearly every household has at least one member working in tourism – sometimes as much as 80% or 30% of all residents. Phrases such as "*the main source of income*" and "*almost every household has someone in tourism*" illustrate not just the prevalence but the deep integration of tourism into daily livelihoods.

Importantly, the sector is often described as a preferred opportunity – especially for young people and those without university degrees. For many, it represents an accessible entry into the workforce.

5.2.3.5.8. Fishing Activities

Fishing is largely absent as a source of employment or income in the affected settlements, as given in Table 5-27. The overwhelming majority (88.2%) rate fishing as "inexistent" in their communities. Only 8.8% judge it to be "marginal," and a single respondent (2.9%) in Karaöz, Manavgat considers it of "average" importance. This distribution demonstrates that, in terms of livelihood, fishing is practically irrelevant to most households and local economies.

Table 5-27. Signifance Level of Fishing as a Livelihoods Source

Significance Level	Count	Percentage
Average	1	2.9
Marginal	3	8.8
Inexistent	30	88.2

5.2.3.6. Grazing Areas

Among 34 mukhtars, 10 of them revealed that among the territory of their neighbourhood there is a pasture land and 9 of them have added that the agricultural lands are used for grazing, as summarised in Table 5-28.

Despite animal husbandry is in decline grazing practices in the region are both resourceful and deeply rooted in tradition, particularly among communities with a *Yörük* heritage. Summer pastures ("*yayla*") remain integral to animal husbandry. Livestock, especially small ruminants, are commonly taken to these highland pastures during the summer months, a practice that reflects longstanding nomadic traditions. In winter, animals are mainly kept in barns and fed stored fodder or grazed on agricultural fields. Some also utilise open, treeless forest lands and fallow areas for grazing, especially where pastureland is lacking. Reliance on forested or previously deforested areas as substitute grazing lands is also common. While past practices allowed grazing in forests, current regulations prohibit grazing in reforested zones. Nevertheless, open or unused parts of forests continue to serve as essential grazing grounds for many. Seasonal use of "*yayla*" highlights the persistence of traditional animal husbandry patterns.

Table 5-28. Pastures and Grazing Areas in Affected Settlements

Pastures and Grazing Areas	Settlements
Pasture lands available in the settlements	**Serik:** Aşağıçatma, Cumalı **Manavgat:** Aksaz, Çolaklı, Hacıali, Hacıisalı, Kalemler, Yalçıdibi, Yukarıışıklar **Alanya:** Türkler
Agricultural lands are used for grazing	**Serik:** Burmahancı **Manavgat:** Aşağıışıklar, Bucakşeyhler, Çakış, Çolaklı, Evrenleryavşı, Evren, Hacıali, Hacıisalı, Hacıobası, Hocalar, Kalemler, Karaöz, Şişeler, Taşağıl, Yalçıdibi, Yukarıışıklar **Alanya:** Alara, Elikesik

5.2.3.7. Unemployment

Unemployment does not appear to significantly affect the majority of the population in the surveyed area, as summarised in Table 5-29. Nearly 90% of respondents (88.24%) report that unemployment is not a major issue within their community. Only a small minority (about 12%) – Aksaz, Hacıobası, Kalemler and Türkler – indicate that unemployment does affect a substantial part of the local population.

Table 5-29. Unemployment as a Significant Issue in Affected Settlements

Response	Count	Percentage
No	30.0	88.24
Yes	4.0	11.76

One group frequently mentioned as affected by unemployment is university graduates. Several notes indicate that many young adults who have completed higher education struggle to find jobs related to their field. When they do secure employment, it is often in positions considered below their qualifications, such as cashier jobs in large supermarket chains. This points to frustrations with underemployment, where education does not translate into suitable or fulfilling work opportunities.

Another group facing unemployment consists of those involved in the tourism sector. Respondents highlight the seasonal nature of this industry: while jobs may be plentiful during the tourist season, many people become unemployed in the off-season, particularly in winter. This seasonal cycle is a well-known challenge in regions dependent on tourism, where employment opportunities can fluctuate dramatically over the year.

5.2.3.8. Temporary Population

Among the 34 neighbourhoods surveyed, temporary (non-permanent) households is present in 10 settlements. The prevalence and scale of such dwellings vary significantly by neighbourhood and district, as summarised in Table 5-30.

Manavgat stands out, both for the number of neighbourhoods affected and the total number of temporary houses, with Dikmen hosting the largest concentration (approximately 120 houses). It is also evident fact that small size neighbourhoods attract temporary residents more.

These findings indicate that temporary housing is primarily clustered in certain neighbourhoods – especially within Manavgat – and can represent a substantial part of the local housing stock, potentially reflecting seasonal or migrant labour patterns, post-disaster accommodation, or insufficient affordable permanent housing.

Table 5-30. Number of Estimated Temporary Houses in Neighbourhoods

District	Neighbourhood	Population of Neighbourhood (TURKSTAT, 2024)	Number of Estimated Temporary Households
Serik	Deniztepesi	982	28
Manavgat	Dikmen	1,261	120
Manavgat	Bucakşeyhler	737	50
Manavgat	Şişeler	236	20
Manavgat	Kalemler	341	11
Manavgat	Hacıisalı	364	10
Manavgat	Uzunlar	348	5
Manavgat	Kadılar	173	4
Alanya	Emişbeleni	1,607	1
Alanya	Toslak	3,722	50

5.2.3.9. Refugees

The mukhtar surveys identified that, refugees (immigrants) are present in 19 of the 34 surveyed settlements:

- **Serik**: Burmahancı, Cumalı
- **Manavgat:** Aksaz, Aşağıışıklar, Burmahancı, Çakış, Çolaklı, Cumalı, Dikmen, Evren, Hacıobası, Hocalar, Kalemler, Karaöz, Taşağıl, Uzunlar, Yavrudoğan
- **Alanya:** Elikesik, Emişbeleni, Telatiye, Türkler

The distribution suggests that refugee presence is a common but not universal aspect of the local community, and experiences or perceptions related to refugees may vary.

Qualitative responses from key informant interviews with mukhtars, indicate a notable presence of Afghan and Syrian immigrants across the surveyed neighbourhoods, primarily working in greenhouses, orchards, and agricultural settings. Most respondents describe refugee populations ranging from a few individuals or families to larger groups, with some estimates reaching up to 100 persons in a single area.

Interviews and field observations reveal the following key patterns regarding the employment and housing conditions of the refugees in the affected settlements:

- The majority of immigrants are employed as agricultural labourers, especially in greenhouses and orchards. In some cases, Afghan immigrants also work as shepherds.
- Many respondents note that refugees typically reside in makeshift accommodations such as barracks, shacks, or containers located adjacent to their workplaces. Some families live directly within the village, but larger groups are generally housed on or near agricultural properties.
- Most frequently small groups or individual families (Afghan or Syrian) are present.
- Larger work crews, sometimes totalling between 15-20, 30 or even up to 100 individuals, were also reported, particularly during peak agricultural seasons.

5.2.4. Physically Displaced Households

The baseline information presented below is derived from the RAP surveys carried out by the RAP Consultant Team during **Campaign 1** (except for Section 5.2.4.1, which reflects the results from both Campaign 1 and 2) **,** which was completed in May 2025.

5.2.4.1. Number of Affected Persons and Average Household Size

Table 5-31 presents the distribution of household sizes within the sample population. The most common household size is 2 members, accounting for a total of **51 households.**

This is followed by households with **4 members** (**48 households**) and **3 members** (**34 households**), indicating a general prevalence of mid-sized families.

Households with **5 members** also represent a notable portion of the sample, totaling **28 households**. Smaller households with only **1 member** are relatively less frequent, with **22 households** in total. Households with 6 or 7 members are the least common.

Overall, this distribution suggests that households with **2 to 4 members dominate the sample**. The **average household size** across all surveyed households is **3.23 individuals**.

Table 5-31. Household Size Distribution of the Sample Population

Household Size	Number of Households		Total Number of Households
	RAP Surveys Campaign 1 (ma	RAP Surveys Campaign 2	
1	13	9	**22**
2	29	22	**51**
3	16	18	**34**
4	20	28	**48**
5	15	13	**28**
6	6	5	**11**
7	0	2	**2**
Total	99	97	**196**
Total number of Individual	304	329	**633**
Average Household Size	3.07	3.39	**3.23**

As previously presented in Section 3.2.2.1 – Table 3-19 and summarised below in Table 5-32;

- **The total number of residential structures to be affected by the Project along the full alignment is 304.** This figure is based on a full census of affected structures conducted by the valuation contractor as part of the expropriation planning studies and includes both permanent and temporary (seasonal) residences.
- **The total number of households** residing in these 304 affected residential structures is **349.**
- During the RAP field studies conducted in May 2025, **surveys were completed with 196 of these 349 households** (see Table 5-31).
- As given in Table 5-31, the **average households size of the physically displaced households** within the RAP survey sample is **3.23.**
- **Accordingly, the total number of persons to be physically displaced from these 349 households is 1,127.**

Table 5-32. Number of Persons (Individuals) to be Physically Displaced

Number of Affected Residential Structures	Number of Households Residing in Affected Residential Structures (based on expropriation plans)	Average Household Size (based on RAP Field Surveys of May 2025)	Total Number of Persons (Individuals) to be Physically Displaced
304	**349**	**3.23**	**1,127**

5.2.4.2. Respondents' Profile

Table 5-33 provides a breakdown of the gender distribution among the respondents in the sample. Of the respondents, a significant majority are male (90.9 %). This indicates a notably higher representation of females in the sample population.

Table 5-33. Gender of Respondents

Gender	Number of Households
Male	90
Female	9
Total	**99**

Table 5-34 provides an overview of the education levels among the respondents. A significant majority, **56.6%** households, report having completed **primary school**.

Table 5-34. Education Levels among Respondents

Education Level	Number of Households
Primary school	56
Secondary school	14
High-school	14
University	8
No degree	7
Total	**99**

5.2.4.3. Land Tenure and Ownership

Table 5-35 presents the **ownership or tenancy status of the land** on which the affected houses are located. Among the 99 households, the majority are owners of private land, accounting for **46.5%**. A significant portion of the households, **42.4%**, are **informal users of public land** such as treasury, forestry or non-registered lands.

Table 5-35. Land Ownership or Tenancy Status of Households using the Affected House

Ownership of the Parcel Containing the Affected House	Number of Households
Owner of the private land (in full or through partial/shared ownership)	46
Informal user of public land	42
Informal user of private land	7
Formal renter of private land	2
Formal user of private land, with no rental payment	2
Total	**99**

5.2.4.4. Structure Tenure and Ownership

Table 5-36 the **ownership or tenancy status of the households residing in the affected houses**. A significant portion of the households, **32.3%**, are **full owners** of their homes, holding the **full title deed**, while others, **18.2%**, have **partial ownership** through **co-ownership** of the house. Many households, **36.4%**, occupy **informal houses on public land without any official permit or documentation**. There are households that are **formal renters, 4.0%,** or **formal users of the house without making any rental payments, 7.1%**. A small group of households is currently involved in an ongoing **lawsuit regarding ownership** of their homes.

In the affected households, the majority of co-owners of the structures are close relatives, thus property ownership is often shared within families.

In cases where the property is co-owned, **7 households** reported that the other co-owners do **not confirm or accept** the ownership of the property. This indicates potential disagreements or disputes regarding the

ownership rights, which may result in the actual users of the property **not** receiving the cash compensation to be paid by KGM in line with the Expropriation Law.

Table 5-36. Structure Ownership or Tenancy Status of Households using the Affected House

Ownership of the Affected House	Number of Households
Owner of the house, holding full title deed	32
Co-owner of the house, holding partial shares of the titled deed	18
Owner of the house on public land (informal house)	36
Formal user of the house, with no rental payment	7
Formal renter of the house	4
Owner of the litigious house (ongoing lawsuit for ownership)	2
Total	**99**

5.2.4.5. Inheritance and Succession Status

Table 5-37 presents the method through which the affected parcels were acquired. A large majority of the parcels, **70%**, were obtained **through inheritance** and **29%** of the parcels were acquired **through other means**, such as purchase.

Of the cases where inheritance applies, **31 households** have the **inheritance certificates** required for legal recognition of ownership, while **51 households** do not possess these documents, as indicated on the last column of the table. Among the inheritors, only **23 households** have successfully completed the inheritance transfer and succession procedures.

Table 5-37. Acquisition of the Affected Parcel through Inheritance

Acquired through Inheritance?	Number of Households	Status of Inheritance Documentation ("*Veraset Belgesi*")
Yes	70	- **31** have the inheritance certificates - **51** do not have inheritance certificates - **17** did not respond
No	29	Not applicable
Total	**99**	Not applicable

5.2.4.6. Residence Status: Permanent or Temporary

As outlined in Table 5-39, majority of the households, **over 84%**, reported that the affected house is their primary and permanent residence. The temporary residence are used during **weekends and holidays**, in **winter or summer, or** seasonally during **agricultural activities.**

Among the respondents, 75 households have been reportedly residing in the affected house for more than 10 years, indicating long-term residence and 24 households have lived in the house for less than 10 years.

Table 5-38. Residence Status

Residence Status	Number of Households
Permanent	84
Temporary	15
Total	**99**

5.2.4.7. Ownership of Another House

As outlined in Table 5-39, 35 households reported having another house, while 59 households indicated that they do not own any other property, suggesting that that the majority of households rely solely on their current residence.

Table 5-39. Ownership of Another House

Ownership of Another House	Number of Households	Location of Other House
Yes	35	- 16 in the same neighbourhood - 13 in the same district - 4 in other districts - 2 in other provinces
No	59	-
No response	5	-
Total	**99**	**-**

5.2.4.8. Income Sources

The **sources of income** for households in the affected areas include the following:

- Agriculture,
- Animal husbandry,
- Beekeeping,
- Daily wage jobs.
- Disability pension,
- Financial assistance,
- Monthly salary,
- Rental income (such as from shops),
- Retirement pension,
- Tourism,
- Trade,
- Widow's pension,

Table 5-40 outlines the primary sources of income for the households in the affected area. **Agriculture** stands as the dominant primary source of income, followed by retirement pension and monthly salary. Smaller portions of the population rely on **tourism**, **trade**, and **rental income**, while **animal husbandry** and **forestry** are less common. 14 households have members working in the tourism sector.

Table 5-40. Primary Sources of Income for Households

Primary Source of Income	Number of Households
Agriculture	35
Retirement pension	20
Monthly salary	17
Animal husbandry	1
Tourism	7
Trade	4
Rental income	4
Aids	3
Forestry	1
No response	7
Total	**99**

5.2.4.9. Agricultural Activities on Affected Parcels

On 70% of the parcels containing affected houses, agricultural activity is conducted, either for economic purposes or household consumption. Table 5-41 shows that 47.5% of the affected parcels are used for open-field agriculture, representing the majority of agricultural activities and 23% of the affected parcels used for greenhouse farming. On the remainder, there is no reported agricultural activity.

Table 5-41. Parcels Containing House and used for Agriculture

Agriculture on Affected Parcel	Number of Households
Greenhouse	23
Open-field agriculture	47
None	29
Total	**99**

The agricultural activities conducted on the affected parcels are predominantly centred around citrus cultivation, with citrus orchards ("*narenciye bahçesi*") being the most commonly reported activity among respondents. This is followed by olive groves ("*zeytinlik*") and small-scale fruit production. Additionally, greenhousing and livestock farming were mentioned by several respondents.

As presented in Table 5-42, majority of the affected households (approximately 62%) reported the presence of irrigation infrastructure on their parcels. Based on the data provided, the primary source of irrigation for the affected parcels is **groundwater** accessed through wells. This is followed by the use of pressurised piped systems and open water channels. A smaller number of individuals reported relying on natural streams and spring water as their water source.

Table 5-42. Presence of Irrigation Infrastructure on Affected Parcel

Presence of Irrigation Infrastructure on Affected Parcel	Number of Households
Yes	61
No	13
No response	25
Total	**99**

5.2.4.10. Relocation Challenges

The respondents expressed the following challenges related to the relocation process, with most indicating multiple difficulties:

- **New Land Availability**: 83 respondents identified the difficulty in finding new land as a significant issue.
- **Loss of Livelihood**: 72 households reported concerns about the loss of their job or income sources/
- **Loss of Social Networks**: 71 respondents mentioned the loss of social networks, such as friends and family.
- **Increased Travel Distance**: 30 respondents expressed concerns about the potential increases for travel distance to their lands.
- **Commute to Work**: 24 respondents noted concerns around potential increases in commute distance to their workplace.

5.2.4.11. Relocation Expenses

The respondents identified various expenses and challenges associated with the relocation process, reflecting the complexity of the situation. Key costs include:

- **Transportation and Moving Costs:**

  Moving and relocation costs for items, including furniture, livestock, and agricultural equipment. Estimates for moving expenses range from 50,000 TL to 200,000 TL[66], depending on the size of the household and property.

  This includes labour costs for packing, moving, and setting up at the new location, especially for households that rely on agriculture or livestock farming.

- **Costs related to Utility Registration:**

  Costs associated with new homes, including connection fees for utilities like water and electricity.

- **Legal and Documentation Fees:**

  Title deed transfer and other documentation costs related to new properties.

- **Additional Expenses:**

  Costs for damaged or broken equipment during the move, and insurance for property.

[66] In June 2025, the SPV engaged with local transportation firms and obtained a benchmark quotation of 15,000.00 TRY for the relocation of houses within the Manavgat district

Many respondents expressed the need for financial support to cover these expenses, particularly for transportation.

As presented in Table 5-43, it is worth noting that the vast majority of respondents (76 out of 99, approximately 77%) **rely on acquaintances and social networks** to obtain information about land for sale in their neighbourhood. This highlights a strong preference for informal, community-based communication channels. Notably, the **use of real estate offices is extremely limited**, with only 2 respondents **(2%)** citing them as a source of information. This indicates that real estate agents are not a common or preferred avenue for transactions in the area. Instead, people tend to depend on word-of-mouth, and to a lesser extent on online listings (9 respondents) or the settlement head (mukhtars, 4 respondents).

Table 5-43. Sources of Information on Sales in the Neighbourhood

Sources of Information on Sales in the Neighbourhood	Number of Households
Acquaintances	76
Internet	9
Settlement Head (Mukhtar)	4
Real Estate Offices	2
No response	8
Total	**99**

Similarly, as presented in Table 5-44, the data given in demonstrates a clear preference for purchasing property **directly from the owner**, with 84 out of 99 respondents **(approximately 85%)** indicating this as their favored method. In contrast, **only** 6 respondents **(6%)** reported a preference for buying property through a **real estate agent**. This finding reinforces the earlier observation that **real estate intermediaries play a minimal role** in the local land market.

Table 5-44. Preferred Method for Purchasing Property

Method	Number of Households
Directly from landowner	84
Through Real Estate Offices	6
No response	9
Total	**99**

5.2.4.12. Relocation Support Needs

During the RAP field surveys, affected households articulated a wide range of support needs specific to the relocation process. The following types of support were commonly requested:

- **Housing Support**
  - Support for construction of a replacement housing or finding an affordable ready-built house.
  - Allocation of land in forested or treasury-owned areas by the relevant authorities for replacement housing construction.
  - Relocation to the same neighbourhood or a nearby area.
  - Request for homes to be of equivalent value and standard to existing ones.
- **Financial Compensation**
  - Fair and full compensation for houses, trees (such as mature citrus trees), greenhouses, and agricultural investments.
  - Demand for payment based on market value.
  - Compensation for lost livelihoods.
- **Rental and Transitional Housing Assistance**
  - Temporary rental support until new housing is constructed, where needed.
  - Requests for long-term rental aid, particularly from elderly or low-income households.
- **Transport and Moving Costs**
  - Coverage of all moving and transport expenses, including:
    - Household goods
    - Livestock and animals, where applicable (noting that this requires a more sensitive and carefully managed process compared to non-living items)
    - Agricultural tools and machinery
    - Infrastructure like water pipes, drainage systems, and movable greenhouse components
- **Livelihood Restoration and Agricultural Support**
  - Assistance with reestablishing greenhouses, orchards, and livestock facilities.
  - Payment for the relocation or replanting of mature fruit trees.
  - Support for rebuilding physical infrastructure (e.g., barns, irrigation systems).
- **Social and Special Support Needs for Vulnerable People**
  - Additional help for elderly, physically or mentally disabled, and chronically ill individuals.
  - Physical support during the moving process.
  - Requests for security and community continuity for elderly residents.
- **Material, In-Kind and Soft Assistance**
  - Requests for building materials (cement, bricks, iron) during reconstruction.
  - Need for containers, electrical connections, and other utilities.
  - Requests to avoid demolition of homes where possible.
  - Avoiding psychological distress and economic hardship due to relocation.
  - Clear, fair, and participatory communication during the resettlement process.

5.2.4.13. Project Awareness

The data on Project awareness before the RAP Surveys, as given in Table 5-45, indicates that a large majority of respondents (78 out of 97, **78.8%) were already aware of the Motorway Project** prior to participating in the survey. This suggests that the Project had already been disseminated through public or informal channels to a significant extent before formal stakeholder engagement activities began.

The data suggests that while **KGM and its technical teams** were the primary formal source of information, informal communication channels such as neighbours, acquaintances, and local leaders also played a critical role in spreading awareness.

Table 5-45. Awareness of the Motorway Project before RAP Surveys

Response	Number of Households
Yes	78
No	19
No response	2
Total	**99**

On the other hand, it is worthwhile to note that t**he majority of respondents** (76 out of 99, **76.7%**) stated they **do not know the detailed route** of the Motorway project. While many have heard about the Project in general terms, there appears to be limited access to or understanding of the precise alignment.

The efforts initiated by the SPV to enhance public awareness of the affected parcels and the expropriation process – such as posting the list of affected parcels and distributing KGM's expropriation booklet – in general are detailed in Chapter 10.

Table 5-46. Awareness of the Route Details

Response	Number of Households
Yes	15
No	76
No response	8
Total	**99**

5.2.4.14. Project Perception

During consultations and surveys, affected individuals shared a range of reflections on how the Project may influence their lives. While a limited number of affected households recognised the potential broader benefits of improved infrastructure, they mostly expressed concerns about the relocation, loss of homes and anticipated impacts on their livelihoods, living conditions, and social ties.

Several participants emphasised the potential difficulties associated with relocating homes or agricultural activities, highlighting both the financial burden and the emotional attachment to land and property that, in many cases, had been in use for generations. For households that may need to resettle, there were concerns about finding a proper resettlement site, adapting to new environments, maintaining proximity to extended family, and preserving established social networks.

Another frequently raised issue was the risk of income disruption, particularly among households whose primary sources of livelihood stem from agriculture, greenhouses, or livestock activities. Some respondents noted that the loss of productive land could challenge their ability to maintain the same level of output or revenue, especially in the short term. In addition, some respondents expressed a degree of uncertainty about the transition process, particularly in relation to compensation timelines, availability of suitable alternative land, or future livelihood opportunities.

5.2.5. Economically Displaced Households

The baseline information presented below is derived from the RAP surveys carried out by the RAP Consultant Team during Campaign 1, which was completed in May 2025.

5.2.5.1. Number of Affected Persons and Average Household Size

The RAP field surveys have covered a total of 202 households, comprising 651 individuals, identified and interviewed through 217 household (livelihoods) surveys. The **average household size** was calculated as **3.1 persons** per household. The distribution of household sizes indicates that **most households consist of two to four members**, which together account for over **80%** of the sample population. Single-person households represent a small proportion (4.5%), while larger households of five to six members constitute approximately 14% of the total.

Table 5-47. Household Size Distribution of the Sample Population

Household Size	Number of Households
1	9
2	60
3	51
4	53
5	17
6	12
Total	**202**
Total number of Individual	**651**
Average Household Size	**3.10**

5.2.5.2. Respondents' Profile

Among the 217 surveyed households, the majority (190 households, or approximately 87.6%) had male respondents who were also the heads of their households, while 27 households (12.4%) surveys were carried out by women. This gender distribution indicates a predominance of male-headed households within the Project-affected population, aligning with typical demographic patterns observed in rural and semi-rural settings in the region.

Table 5-48. Gender of Respondents

Gender	Number of Responses
Male	190
Female	27
Total	**217**

Table 5-34 provides an overview of the education levels among the respondents. A significant majority, over 62% (this was **56.6%** for physically displaced households), reported being **primary school** graduates.

Table 5-49. Education Levels among Respondents

Education Level	Number of Responses
Primary school	135
Secondary school	21
High-school	30
University	24
No degree	2
Bilinmiyor	5
Total	**217**

As shown in Table 5-50, a substantial majority of affected households – 149 out of 217 (**68.7%**) – reported being registered in the Farmers Registration System[67] (ÇKS). This registration provides formal recognition of their status as farmers and grants access to agricultural subsidies, support programs, and public insurance mechanisms. In contrast, 59 households (**27.2%**) stated that they were not registered, and 9 households (**4.1%**) did not provide a response.

Table 5-50. Official Farmer Status

Farmers Registration System (ÇKS) Registration Status	Number of Responses
Registered	149
Non-registered	59
No response	9
Total	**217**

5.2.5.3. Land Tenure and Ownership

Table 5-51 presents the land ownership or tenancy status of the surveyed households. Among the 217 households, a substantial majority – 157 households (approximately 72%) – reported owning the private land covered by the survey, either in full or through partial/shared ownership.

A notable portion – 55 households, **35%** – were identified as **informal users of public land**, while **no** households were found to be informal users of private land. An insignificant number of households reported formal rental or usage arrangements on private land, including 3 formal renters (**1.4%**) and 2 formal users who did not pay rent. This distribution highlights the predominance of private land ownership among the affected population, followed by informal users of public land.

During the RAP surveys, 7 households reported that they are involved in ongoing legal proceedings concerning land ownership.

Table 5-51. Land Ownership or Tenancy Status of Households using the Affected House

Ownership of the Parcel Containing the Affected House	Number of Responses
Owner of the private land (in full or through partial/shared ownership)	157
Informal user of public land	55
Informal user of private land	0
Formal renter of private land	3
Formal user of private land, with no rental payment	2
Total	**217**

5.2.5.4. Inheritance and Succession Status

As presented in Table 5-52, out of the 217 surveyed households, 120 (**over 55%**) reported having acquired the land **through inheritance**. An additional 37 households reported that their land was not acquired through inheritance and 70 households reported indicated informal inheritance of public land through generations.

Among these, 124 households indicated they possess inheritance certificates, while 29 stated they do not have such documentation, and 64 households did not respond to this question.

Table 5-52. Acquisition of the Affected Parcel through Inheritance

Acquired through Inheritance?	Number of Households	Acquired through Inheritance?
Yes	120	- 29 do not have inheritance certificates
No	37	Not applicable
Public land passed down through family inheritance	70	Not applicable
Total	**217**	

[67] Registered farmers can benefit from certain supports and grants given by the government to the agricultural sector.

5.2.5.5. Income Sources

The **sources of income** for households in the affected areas include the following:

- Agriculture
- Retirement pension
- Monthly salary
- Animal husbandry
- Tourism
- Trade
- Rental income
- Aids

Table 5-53 summarises the **primary sources** of income reported by the surveyed households. **Agriculture was identified as the most common source of livelihood,** with 78 households relying primarily on agricultural activities. This was followed closely by **retirement pensions**, which served as the main income source for 74 households, indicating a significant portion of the population is elderly. Monthly salaried employment was reported as the primary income by 32 households, while 17 households relied on **tourism-related activities**. Smaller numbers of households reported trade (9) and animal husbandry (7) as their main income sources.

No households reported rental income, forestry, or social aid as their primary means of livelihood. These findings reflect a mixed economy with a strong reliance on agriculture and fixed-income sources.

Table 5-53. Primary Sources of Income for Households

Primary Source of Income	Number of Responses
Agriculture	78
Retirement pension	74
Monthly salary	32
Animal husbandry	7
Tourism	17
Trade	9
Total	**217**

In addition to reporting the income sourced, affected persons also requested that information be provided on their income and expenditures. The information collected in response to this request has been duly taken into account, and the corresponding data has informed the assessment of household vulnerabilities (i.e. low income households), as presented in Chapter 12.

5.2.5.6. Agricultural Activities on Affected Parcels

As detailed in Table 5.46, **agricultural activity is present on a significant majority of affected parcels (204 out of 217, 94%)**. **Open-field agriculture** is the most prevalent type, noting that some of the households practice both greenhouse and open-field agriculture on the same plot.

Table 5-54. Agricultural Activities on Affected Parcels

Agriculture on Affected Parcel	Number of Responses
Both greenhouse and open-field agriculture	20
Open-field agriculture only	162
Greenhouse only	11
Uncultivated or used for other purposes (such as housing)	17
Total	**217**

The affected parcels support a wide range of agricultural production, with many households cultivating multiple crop types. **Olive cultivation** and **citrus** ("*narenciye*") **fruits** such as **oranges** emerge as the most commonly reported crop types. Other cultivated crops included **apricots** (2 parcels)**, watermelons** (3 parcels)**,** as well as grains like wheat (3 parcels) and oats (2 parcels). Additionally, a limited number of households grow high-value crops such as **avocados** (4 parcels)**, figs, and pistachios** (2 parcels), as well as vegetables including tomatoes, cucumbers, peppers, and eggplants. Some parcels are used for mixed cropping or intercropping systems, combining fruit trees, field crops, and vegetables.

Purpose of Agricultural Production

Table 5-54 illustrates the primary purpose of agricultural production among affected households. Of the 217 surveyed households, 118 households (**54.3%**) reported engaging in agriculture primarily for **commercial purposes**, indicating a strong reliance on farming as an income-generating activity. 42 households (**19.4%)** indicated that they produce mainly for **household consumption (subsistence)**, while a further 52 households (**24.0%**) reported dual-purpose production, combining subsistence and commercial aims.

A smaller subset of households (5 households, **2.3%**) produce exclusively for fodder use, supporting livestock-based livelihoods.

Table 5-55. Purpose of Agricultural Production

Purpose of Agricultural Production	Number of Responses
For own household consumption (subsistence)	42
For large-scale commercial purposes	118
Both for subsistence and commercial purposes	52
For fodder use (animal feed)	5
Total	**217**

Presence of Irrigation Infrastructure

As presented in Table 5-56, presents the availability of **irrigation infrastructure** on the affected parcels. Out of 217 surveyed households, 149 (approximately **69%)** reported the presence of irrigation infrastructure, while 63 households (**29%**) stated that their parcels lack irrigation infrastructure. Five households did not provide a response.

Table 5-56. Presence of Irrigation Infrastructure on Affected Parcel

Presence of Irrigation Infrastructure on Affected Parcel	Number of Responses
Yes	149
No	63
No response	5
Total	**217**

Table 5-57 presents the responses of surveyed households regarding the need for assistance in identifying alternative agricultural land. Out of 217 respondents, 114 households (**52.5%**) stated that **they would require support** in locating new parcels suitable for agricultural use. In contrast, 83 households (**38.2%**) indicated that they would not need such assistance, while 20 households (9.2%) did not provide a response.

Table 5-57. Assistance Need in Finding Alternative Agricultural Land

Assistance Need	Number of Responses
Yes, assistance needed	114
No, not needed	83
No response	20
Total	**217**

5.2.5.7. Total Productive Area

As shown in Table 5-58, 129 out of 217 surveyed households (**59.4%**) reported that they own or use additional parcels outside the motorway expropriation corridor, while 51 households (23.5%) indicated that they do not have access to other land, while 37 households (17.1%) did not provide a response.

This distribution suggests that while a majority of affected households may have some capacity to continue agricultural activities on land outside the expropriation corridor, this alone does not guarantee the sustainability of their livelihoods. For the 23.5% of households who reported having no additional land – a figure that could be higher when including people among non-respondents – the loss of land is likely to have a significant impact on household livelihoods, particularly in cases where there are no alternative income sources to offset the displacement from agricultural production.

Table 5-58. Presence of Other Parcels Owned or Used outside the Motorway Expropriation Corridor

Presence of Other Parcels Owned or Used outside the Motorway Expropriation Corridor	Number of Responses
Yes	129
No	51
No response	37
Total	**217**

Table 5-59 presents the distribution of total parcels owned or used by affected households, both within and outside the motorway expropriation corridor.

The data indicates that a majority of households holding multiple parcels across different locations. Only 21 households (**9.7%**) reported owning or using a single parcel, while 35 households (**16.1%**) had two, and 33 households (**15.2%**) held three parcels. The proportion decreases gradually with increasing landholdings, but a notable 28 households (**12.9%**) reported owning or using between 6 and 10 parcels, and 8 households held between 11 and 20 parcels. Additionally, 3 households reported ownership or use of more than 20 parcels.

This information will require verification during RAP implementation in order to make a sound and accurate assessment of households significantly affected, specifically those losing more than 20% of their total productive land area, through the review of official documentation such as title deeds, as well as through local validation mechanisms, including consultation with mukhtars and other trusted community members in cases involving informal land use.

In addition to reporting the number of parcels, affected persons also requested that information be provided on the area of productive land located outside the expropriation corridor. The information collected in response to this request has been duly taken into account, and the corresponding data has informed the assessment of household vulnerabilities, as presented in Chapter 12.

Table 5-59. Number of Parcels Owned or Used by Affected Households inside and outside the Expropriation Corridor

Total Number of Parcels Owned or Used	Number of Responses
1	21
2	35
3	33
4	22
5	17
6-10	28
11-20	8
Over 20	3

5.2.5.8. Investment Plans in Remaining or Alternative Landholdings

When asked how they would invest in their remaining or alternative landholdings if they had access to capital, respondents shared a diverse set of ideas primarily centered on enhancing agricultural productivity and diversifying income sources. The most frequently mentioned investment priority was **banana (muz) greenhouse farming** (*34 mentions*), indicating a strong interest in high-value, market-oriented horticulture, especially in areas with suitable climatic conditions (such as neighborhoods of Alanya district). This was followed by general interest in **greenhouse development** (*22 mentions*), with many expressing the intention to expand **vegetable or mixed crop cultivation** under cover.

Avocado production emerged as a popular option (*18 mentions*), reflecting regional trends toward tropical fruit cultivation. Interest in **olive farming** (*16 mentions*) remained, particularly among households seeking to expand traditional groves or improve their productivity. **Citrus farming**, including oranges and other *narenciye* products, was cited by *9 respondents*, often in combination with greenhouse or orchard expansion.

Beyond crop production, **livestock rearing** – both small and large-scale – was identified as an option considered by *12 respondents*. Other themes, though less frequently cited, included **strawberry cultivation** (*5 mentions*), **tropical fruits such as dragon fruit, mango, and papaya** (*7 mentions*), **irrigation infrastructure improvements** (*6 mentions*), and **agricultural equipment or tractor purchases** (*3 mentions*).

Smaller numbers of respondents expressed interest in **organic/natural farming approaches** (*3 mentions*), **tourism-related ventures or local product sales** (*2 mentions*).

This feedback offering critical insights on livelihood preferences and plans have been evaluated and feasible alternatives have been considered in the design of livelihood restoration packages, as presented in Chapter 8.

5.2.5.9. Support Needs and Requests for Other Landholdings

In response to questions about what types of support would help them increase income or reduce costs on other landholdings remaining unaffected by the Project, respondents highlighted a wide range of needs – primarily focused on input subsidies and infrastructure assistance.

The most frequently cited request was for **fuel** support (35 mentions), followed closely by **fertilizer** assistance (34 mentions), underscoring the growing burden of input costs on small and medium-scale producers. Similarly, **seedlings, saplings, and seed provision** was identified by 28 respondents.

Pesticide and agrochemical inputs were also commonly mentioned (27 mentions), along with calls for assistance in greenhouse establishment or greenhouse-specific grant support (16 mentions), particularly from those interested in transitioning to higher-yield or protected cultivation systems. Respondents also emphasized the need for irrigation infrastructure and water supply support (14 mentions), as well as electrical connections or energy subsidies (8 mentions), both of which are critical for operating irrigation systems and agricultural technologies.

Targeted assistance for livestock production (such as feed or veterinary services) was raised by 4 respondents, and a handful of responses referenced the need for agricultural equipment or tractor access, seasonal labor support, and **technical training or advisory services on modern or greenhouse-based practices**.

A few individuals also highlighted the importance of market access or assistance with selling their products, particularly in high-traffic locations.

These findings provided a foundation for designing targeted livelihood support packages and feasible alternatives have been considered in the design of livelihood restoration packages, as presented in Chapter 8.

5.2.5.10. Sources of Information on Local Land Sales

As shown in Table 5-60, the majority of households (166 out of 217, **76.5%**) rely on acquaintances as their primary source of information regarding land sales in the neighbourhood. This indicates a strong dependence on informal social networks for market-related knowledge. Other sources, while significantly less common, include the internet (21 households), real estate offices (10 households, **4.6%**), and the settlement head (mukhtar) (9 households, **4.1%**). Only 2 households reported receiving such information through traditional media, and 9 households did not provide a response. Notably, the low percentage of households preferring real estate offices suggests that formal market intermediaries are not commonly consulted, likely influenced by local customs and a preference for trusted personal interactions.

Table 5-60. Sources of Information on Land Sales in the Neighbourhood

Sources of Information on Sales in the Neighbourhood	Number of Responses
Acquaintances	166
Internet	21
Settlement Head (Mukhtar)	9
Basın	2
Real Estate Offices	10
No response	9
Total	**217**

The majority of surveyed households (185 out of 217, or approximately **85.3%**) reported preference for acquiring their land **directly from the landowner**, as shown in Table 5-61. This indicates a strong preference for direct, person-to-person transactions in the local context. Only 21 households (**9.7%**) prefer acquiring land **through real estate offices**, while 5 households (**2.3%**) prefer using other intermediaries (*başka aracıdan*). Six households did not provide a response. The predominance of direct transactions reinforces the informal nature of land markets in the area and aligns with previously observed patterns of limited reliance on formal market channels or intermediaries.

Table 5-61. Preferred Method for Purchasing Land

Method	Number of Responses
Directly from landowner	185
Through Real Estate Offices	21
Other intermediaries ("*başka aracıdan*")	5
No response	6
Total	**217**

5.2.5.11. Project Awareness

As presented in Table 5-62, a significant majority of the surveyed households (178 out of 217, approximately **82%**) reported that they **were aware** of the Motorway project prior to the commencement of the RAP surveys, while 31 households (**14.3%**) stated they had **no prior knowledge** of the Project and 8 households (3.7%) did not provide a response.

Among households who were aware of the motorway project prior to the RAP surveys, the majority of respondents reported learning about the Project through **social contacts** such as relatives, neighbours, or acquaintances, while a significant number also mentioned **KGM representatives** – particularly during site visits, field identification works, or land marking operations. Additionally, mukhtars (neighborhood heads) were frequently cited, either directly or in combination with other sources. A smaller subset of respondents referenced the media (TV, newspapers, or internet).

Table 5-62. Awareness of the Motorway Project before RAP Surveys

Response	Number of Responses
Yes	178
No	31
No response	8
Total	**217**

As shown in Table 5-63, while overall awareness of the Motorway project was relatively high, detailed knowledge about the route remains relatively limited among the affected population. Only 71 households (**32.7%**) reported being aware of the specific route details, whereas the majority – 146 households (**67.3%**) – indicated they had no knowledge of the route alignment.

Table 5-63. Awareness of the Route Details

Response	Number of Responses
Yes	71
No	146
No response	0
Total	**217**

5.2.5.12. Project Perception

Many respondents expressed a variety of potential benefits associated with the Motorway project, with some highlighting multiple advantages within a single response.

Most of the respondents (more than 20 mentions) emphasised **improved transportation**, including reduced travel time and cost, easier access to urban centres, and smoother connections for commuting or transporting goods.

Several participants (15 mentions) noted that the new road would **alleviate local traffic congestion**, making daily travel safer and more efficient.

Others (7 mentions) saw the Project as an opportunity to enhance agricultural income, particularly through **better access to markets** such as wholesale halls ("*hal*"), which could enable them to sell their produce more easily.

Additional perceived benefits (2 mentions) include **boosted trade and tourism** and **economic development** at the **neighbourhood, regional and country level** (10 mentions). A few respondents also highlighted that the Motorway may creating economic opportunities including employment (5 mentions).

It is important to note that these are the perceptions of people economically displaced only and it differs widely from the perceptions of the people and businesses who will be physically displaced

It is important to note that these findings reflect the perceptions of economically displaced individuals only, and their views differ considerably from those of households and businesses that will be physically displaced.

A large proportion of respondents expressed concerns regarding the negative impacts of the Project on their livelihoods and well-being. The most frequently cited issue was **loss of income or primary livelihood** (65 mentions), especially from agriculture, due to the expropriation or fragmentation of productive land. Many participants emphasised **loss of agricultural land** (58), including fertile fields, orchards, and greenhouses, often describing them as their only or most valuable source of income. Others reported concern about **reduced access to remaining parcels** (18), especially where land is split by the Motorway (noting that the majority of respondents confirmed they do not know the route details or the locations of planned crossing structures), as well as **damage to irrigation systems** or **water access** (12).

In addition to economic concerns, many respondents pointed to **psychological and emotional distress** (20), including uncertainty about the future, loss of inherited or long-cultivated land, and the diminished ability to **leave property to future generations** (6). Environmental and social concerns were also frequently cited, with repeated references to **dust, noise, exhaust emissions** (19), and the **loss of trees or ecological resources** (9). Some individuals raised concerns about **community disruption** (7), such as the division of neighbourhoods, isolation from neighbours, and loss of social cohesion. Others expressed concerns regarding **route selection** (5).

Regarding the route alignment, the general preference was for the route to avoid fertile **agricultural land** and instead pass through **public or forest areas**, minimising the impact on productive parcels.

5.2.6. Physically Displaced Businesses

Key information on affected businesses – including their operational characteristics and number of employees – is presented in Section 3.2.2.3.

The following sections present data collected from affected businesses during RAP surveys held in May 2025 to identify the impact categories and inform the design of entitlements –such as relocation packages, moving allowances, and livelihood restoration measures. However, it is important to note that these findings are based solely on self-declarations provided by business owners during the survey. During the RAP implementation phase, each business will be assessed individually by the SPV, with support from qualified experts and as necessary third-party consultants, through official documentation review and in-depth consultations. Business-specific implementation plans will be developed accordingly, tailored to the unique characteristics and needs of each enterprise.

5.2.6.1. Relocation Challenges

The survey responses indicate that business owners foresee a range of challenges resulting from displacement and relocation. These challenges are both operational and financial in nature and can be summarised as follows:

- **Regulatory and administrative burdens:** Several businesses reported that will need to renew licenses, permits, and official registrations such as workplace permits, tax records, business registration, and sector-specific licenses (e.g., food production, pharmacy).
- **Operational disruption and income loss:** Businesses anticipate temporary closure, with some reporting that they may be unable to reopen due to a lack of suitable alternative locations

  Lengthy operation downtime would lead to substantial income loss and potential disruption to supply chains.
- **Customer and market Loss:** Many businesses (such as local markets, retail stores) expressed concern about losing their customer base due to relocation, especially if they are moved to a less accessible or unfamiliar area.
- **Re-establishment Costs: I**n addition to relocation logistics, owners expect setup costs for installing machinery, signing new lease contracts, and refurbishing new spaces.
- **Labour-Related Risks:** Businesses employing staff are particularly concerned about the risk of layoffs, citing the possibility that employees may not be willing or able to commute to the new location.
- **Uncertainty and Insecurity:** Some business owners were unsure about the process or whether they would be able to relocate at all, especially in cases where similar or affordable spaces may not be available.

5.2.6.2. Relocation Expenses

Survey responses indicate that affected business owners anticipate a range of expenses associated with relocation. These expected costs include both direct physical relocation needs and broader financial impacts on their operations. Key cost categories identified are as follows:

- Almost all businesses reported moving and transportation expenses as a major component, including the use of trucks, cranes, or specialised equipment for relocating machinery (for example, for the relocation of animals in the case of a livestock fattening farm "*besihane*").
- Several business owners expressed a preference not to rent new premises, indicating their intent to purchase or construct a new property, which significantly.
- Respondents identified costs related to machine reinstallation, electricity and utility setup, renovations, and depot or office re-establishment. These are often necessary for restoring operations, mostly prior to relocation.
- A number of businesses mentioned the need to update business registrations due to address changes, along with other administrative formalities that may incur additional cost.
- Some respondents raised concern about business interruption, with remarks indicating risks due to extended downtime or an inability to restart their operations from scratch.

Monetary estimates shared by the respondents, depending on the scale and nature of their businesses, have been taken into account in the calculation of the RAP Fund.

5.2.6.3. Relocation Support Needs and Special Requirements

During the consultations, several businesses indicated that they had specific requirements and constraints related to relocation, which must be considered to avoid disruption and loss. While a number of businesses reported no particular needs, others highlighted several key sensitivities:

- A few businesses (egg packaging and storing facility, screening facility, marble workshop), operate with reportedly sensitive machinery requiring disassembly, careful transport, and reinstallation at the new location. In some cases, this includes not only mechanical equipment but also delicate items such as mirrors, shelves, and display units.
- Retail stores selling textiles, apparel and automative parts emphasized the need for protection from sunlight and humidity during transport due to the vulnerability of their goods. Similarly, pharmacy and those dealing with cosmetic products stressed that all equipment, especially racks and storage units, must be moved with extra care due to their fragility and hygiene standards.
- Market operators noted the necessity for specialised transportation services, particularly where hazardous, perishable, or regulated products (e.g., tobacco, alcohol, chemicals, automotive parts) are involved.
- There is a business (livestock fattening farm "*besihane*") combining agricultural production and animal husbandry expressed the need for both machinery and animals to be transported.

5.2.6.4. Fixed Investments and Infrastructural Improvements done at the Affected Premises

The survey responses revealed that part of the businesses have made **fixed investments** in their operating current spaces that are potentially not included in the valuation. These investments vary by business type but generally include:

- Many businesses have financed the construction or modification of facilities such as offices, warehouses, cold storage units, kitchens, sanitary areas, and external concrete surfacing or sunshades.
- Utility and infrastructure improvements were made by businesses operating in non-retail industries, which included electrical installation, custom lighting systems, climate control (e.g., air conditioning, industrial air curtains), and water infrastructure
- Several businesses installed fire extinguishers, fire safety systems, and mechanical ventilation units as part of workplace safety.

Other investments such as commercial refrigerators, storage and shelving units, customized counters, rafters, signage, cameras, and security systems, purchased by the operators are mostly movable items and not considered fixed investments.

5.2.6.5. Licensing and Regulatory Renewal Requirements

Several business owners expect the relocation process to create administrative burdens for several businesses, particularly with regard to the renewal of licenses, permits, and official registrations.

Based on the survey responses:

- Many businesses indicated that they would be required to renew operating licenses, activity certificates, municipal workplace permits, and utility subscriptions due to address changes.
- Specific mentions by different operators included the need to update pharmacy licenses, food safety and production certificates, agricultural permits, and tax registration records depending on the sector.
- The estimated time for completing these administrative procedures varied. Some businesses reported that license renewals would take 15 – 30 days, while others anticipated delays ranging from 6 months to 1 year.

- A few businesses expressed uncertainty about the procedures, highlighting a need for information support and guidance during the relocation process. Others noted that failure to complete these renewals in a timely manner would require them to temporarily close their business, resulting in income loss.
- One business (egg packaging and storage facility) highlighted the need for industrial-grade electrical infrastructure at the new location, as well as the reissuance of official permits and documentation related to operation.

5.2.6.6. Relocation Preferences

In the context of the RAP field surveys, consultations were conducted with affected business owners to understand their preferences and intentions regarding relocation. These discussions revealed a diverse set of relocation strategies.

The range of relocation preferences expressed by business owners includes the following:

- **Remaining within the Same Vicinity:** Several business owners indicated a strong preference to remain within their existing neighborhoods, 189ndividuali their dependence on established customer bases and community familiarity.
- **Relocation to nearby Areas or Town Centers:** Some respondents noted their intention to relocate to nearby sites, including the town center, where commercial visibility and accessibility to clients remain high.
- **Moving to Designated Industrial Zones:** A number of owners are considering relocation to industrial estates or organized industrial zones, which offer infrastructure suited to their operational needs.
- **Use of Family-Owned or Private Land:** A portion of respondents expressed plans to move their businesses to plots owned by relatives or family members, reducing financial pressure during the transition.
- **New Land Acquisition and Self-Built Facilities:** At least one business owner is actively seeking to purchase new land to independently design and construct a facility that meets their specific needs.
- **Rental Solutions:** Several businesses foresee renting as the most feasible option in the short term, particularly where purchasing land is financially prohibitive or where time constraints exist.
- **Interest in Public or Underutilized Lands:** A few individuals expressed willingness to relocate to unused public lands such as forest or treasury areas, pending regulatory permissions and infrastructure availability.
- **Strategic Locations Along Main Roads:** One or more respondents identified potential sites along main roads, citing visibility and traffic access as key considerations for business sustainability.

These varied responses highlight the need for a flexible and responsive approach in RAP implementation, including facilitation of access to land, rental subsidies, support for permitting processes, and targeted livelihood restoration packages tailored to each relocation scenario.

6. Valuation and Compensation Methodology

6.1. Key Compensation and Assistance Principles

The land acquisition process for the Project is being carried out by KGM in accordance with the principles and procedures defined under the Expropriation Law (Law No. 2942, 1983) and other applicable legislation, with official expropriation procedures commencing in February 2025. The status of land acquisition is presented in Section 2.8.

Key gaps between national legislation and international standards – particularly in areas such as asset valuation, resettlement planning, compensation for displacement impacts, livelihood restoration and assistance, stakeholder engagement, grievance management, and the treatment of vulnerable groups and gender considerations – are outlined in Section 4.3.5.

The key compensation and assistance principles that will be adopted and implemented under the Project to ensure that land acquisition processes comply with international standards and requirements of Lenders are summarised below:

- Avoidance and Minimisation of Displacement:

  KGM has made efforts to avoid and minimise land acquisition and expropriation to the extent feasible during the route selection process, in order to reduce the Project's socio-economic impacts and minimise expropriation-related costs. During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the following mechanisms, as outlined in Section 2.10.

- Avoidance of Forced Eviction[68]:

  The Project will not carry out forced evictions except in accordance with national legislation and the requirements of IFC PS5.

  Evacuation of expropriated lands and assets will be requested by the SPV and carried out by the KGM in compliance with **Article 20 of the Expropriation Law**, following the completion of the expropriation process.

  The principles to be followed for avoiding forced eviction and managing the eviction process in compliance with IFC PS5 and requirements of Lenders are outlined in Section 6.4.

- Prioritisation of Purchase through Negotiated Settlement over Expropriation:

  Although Accelerated Expropriation Decisions have been issued by the President of Türkiye in accordance with the Expropriation Law, KGM has prioritised negotiated settlements through Article 8 (purchase method) under this Project. As part of this process, owners and shareholders, including rightful heirs, are formally notified by KGM and invited to in-person negotiations based on valuations conducted in line with the Expropriation Law.

  To inform owners, shareholders, and heirs about the land acquisition process, their legal rights under the Expropriation Law, and the actions required before negotiation meetings – such as completing inheritance and succession procedures[69] – the SPV began distributing printed copies of KGM's informational booklet on the procedural steps of expropriation in affected settlements (Appendix F) in May 2025, as discussed in Section 10.1.3.

  The distribution will continue in line with the Project's expropriation and construction schedules. This initiative aims to help prepare affected persons for the upcoming negotiation meetings and to increase participation and consent rates to the extent possible.

[68] According to IFC PS5, forced eviction is "*the permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection*".

[69] Official notifications (invitations to negotiation meetings) sent to owners and shareholders by KGM, in accordance with Article 8 of the Expropriation Law, explicitly require that inheritance and succession procedures be completed and that inheritance certificates ("*veraset/mirasçılık belgesi*") be obtained prior to attending the negotiation meetings.

During the RAP field surveys conducted in May 2025, affected persons were informed about the ongoing RAP preparation activities and were made aware that, in addition to the legal compensation to be provided by KGM, additional support and entitlements will be made available by the SPV during RAP implementation. Following the finalisation and disclosure of RAP, consultation meetings will be conducted with the affected people to inform them about the details of RAP entitlements, as outlined in Section 10.2 and 10.3.

- Proceeding with Article 27 Court Procedures only after Effective Consultations and Support Measures have been Undertaken:

  KGM will proceed with expropriation through Article 27 under the following conditions:

  - Owners and shareholder have been consulted and informed of their rights under the Expropriation Law.
  - Landowners were formally invited to engage in negotiated settlements under Article 8 of the Law, but no agreement was reached.
  - In cases of disagreement, if sufficient time remains for completion of the land acquisition process before construction, **Article 10** will be applied.
  - If there is an urgent need for land entry, **Article 27** will apply—but only after all shareholders and heirs of deceased owners have been identified and invited to participate in negotiation meetings.
  - No work permits will be issued unless land rights are secured, compensation for crops and similar assets is paid, and **land entry protocols** have been signed with landowners or users.
  - Following an Article 27 court decision, the SPV will confirm that all shareholders have access to their compensation **prior to land entry**.

    To ensure shareholders can access to the compensation after Art 27 court decision before land access right is used by the SPV, the SPV will assist the heirs of affected parcels in obtaining their inheritance certificates from the nearest, as needed. Where necessary, the SPV will also provide logistical support, including travel assistance, and cover associated notary and transportation fees through the RAP Small Costs Fund (a component of the overall RAP Fund).

- Compensation at Full Replacement Cost:

  All compensation to people affected by land acquisition will be provided at **full replacement cost**[70]. This includes market value plus any applicable transaction costs[71], as required by Lenders.

  As the Project progresses, **KGM will update the valuation rates for land and assets at least on an annual basis**[72] to ensure that the expropriation prices offered to eligible individuals reflect current market values.

  To achieve full replacement cost for these structures, the SPV will establish and manage a RAP Fund, from which it will provide the following compensation (please refer to Chapter 16 for RAP Fund):

  - Depreciation: In accordance with the Expropriation Law, depreciation is deducted for buildings and structures (e.g., houses, business premises, and secondary structures) based on the official ratios published in the relevant Turkish legislation. The amount corresponding to the deducted depreciation will be paid to eligible individuals by the SPV through the RAP Fund as additional top-up payments.
  - Compensation for Informal Users on state-owned lands other than forest and pasture lands: Those occupying land without legal title – who own structures on titled or ownerless land – are eligible for compensation under **Article 19** of the Expropriation Law. KGM provides compensation based on **minimum material cost** ("*asgari levazim bedeli*") to individuals who

[70] According to IFC PS5, "*Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value*".

[71] Such as registration, taxes, time lost, cost of transport.

[72] The KGM – Head of Immovables Department informed the SPV on 13 June 2025 that the valuation updates in the Project will be undertaken on a **quarterly** basis.

can demonstrate ownership of structures, even in cases where the underlying land is not titled or the claimant does not hold legal ownership of the land.

The difference between the minimum material cost and full replacement cost for the affected structures will be provided to eligible people by the SPV as additional top-up payments from the RAP Fund. No compensation will be provided for the land itself.

- Compensation for Dense Planting: KGM's 13th Regional Directorate applies a regional-directorate specific **dense planting** ("*sık dikim*") **ratio** when calculating compensation for trees. In this approach, if the total number of trees on a parcel, when divided by the expropriated area, exceeds a certain value, the compensation values obtained from the Provincial Directorate of Agriculture and Forestry is reduced. The gap between KGM's compensation and the rightful compensation has been included in the RAP Fund and will be provided by the SPV as a top-up compensation, as described under Entitlements Matrix.
- Compensation for Informal Users on forest and pasture lands: Informal users of forest and pasture lands are considered as illegal occupants ("*isgalci*") and are not entitled to any form of legal compensation for either the land or the assets under national legislation.

  The structures, trees and crops of these illegal occupants will be compensated by the SPV at full replacement cost. No compensation will be provided for the land itself.
- Small Costs Fund:

  Under the RAP Fund, the SPV will allocate a Small Costs Fund to cover certain transaction costs and expenditure of affected people in relation with official procedures for land acquisition (e.g. working capital fund for title deed transaction for new land purchases, inner city and inter city transportation costs, costs related to inheritance and succession, power of attorney costs).

- Crop payments:

  According to the Expropriation Law, in the case of cultivated land, evacuation is postponed until after harvest; if waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court.

  In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is required by the SPV/EPC Contractor before the harvesting season concludes, the SPV/EPC Contractor accessing the land will provide compensation for the crops from the RAP Fund, in accordance with the Expropriation Law.

- Livelihood Restoration and Assistance in addition to cash compensation:

  In line with the entitlements outlined in Section 7.3, the SPV will provide livelihood restoration and assistance measures to eligible affected people, including owners and users of affected houses, businesses, and lands, as well as their formal and informal users, in accordance with the requirements of the Lenders.

  Details of the livelihood restoration and assistance package options, such as moving allowance, relocation packages for affected houses and businesses, training, etc., tailored to different impact categories are provided in Chapter 8.

- Disclosure and Consultation:

  This RAP will be publicly disclosed through methods appropriate to the local context.

  A non-technical summary of entitlements and procedures will be provided to all people affected by Project-related land acquisition in the form of a **GLAC**.

  The SPV has started engaging with the affected people regarding the expropriation process, and this engagement will continue through a combination of community meetings and face-to-face consultations, as outlined in Chapter 10.

- Grievance Management Mechanism:

  The Project will establish a fair, transparent, and efficient grievance management mechanism to address any compensation-related or other grievances raised by affected people, as described in Chapter 11.

- Vulnerable Groups:

  The SPV will pay specific attention to vulnerable individuals, who will be identified and supported through tailored measures in accordance with the measures outlined in the RAP – Entitlements Matrix, and Chapter 12.

- Monitoring and Reporting:

  The Project will establish a monitoring system to track and report on the performance of resettlement and compensation measures. This system will engage affected people and assess their satisfaction with the process, as detailed in Chapter 12.3.

- Others:

  - Early Consultations and Notification for Land Acquisition Process:

    Affected houses and businesses: The SPV will notify the owners and tenants of affected structures at least **three months**[73] 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 for resettlement planning, including the relocation arrangements of affected businesses.

    In cases where expropriation has already been **concluded**, the SPV will inform property owners of the Project schedule, and each owner will be granted a **six-month** notice period to vacate the property following notification.

    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 or land entry protocols with landowners and users.

  - Land Entry and Land Permit as part of Work Permit System:

    Land entry will occur only after the expropriation process has been completed or mutual agreements (see Appendix E for the consent protocol template) have been executed with the respective owners/shareholders, and compensation payments have been fully made for the parcels to be entered.

    Exceptions may apply in specific cases – such as absentee landowners, ongoing legal disputes, or similar circumstances. In such cases, all details will be clearly documented, and the expropriation compensation will be deposited into an escrow account, to be accessed by the affected people once legal issues are resolved.

    To prevent land entry with incomplete land acquisition, the SPV has initiated incorporating the land acquisition/expropriation completion status into their work permit system and developed land entry and exit protocols (see Appendix D). In line with this system:

    - **Land entry protocols** will be executed before any entry onto each parcel, and only after all compensation payments have been completed – whether under the Turkish Expropriation Law or as required by the RAP.
    - **Land exit protocols** will be executed only for lands acquired on a temporary basis.

  - Future Land Acquisition/Expropriation during operations phase:

    The same principles outlined in this RAP will apply to any future land acquisition or expropriation activities required for the Project. In the event that additional land acquisition or expropriation becomes necessary[74], RAP addendum documents will be prepared and implemented by the SPV in collaboration with KGM, as outlined in Section 3.4.

    These RAP addenda will adhere to the same principles, procedures, and standards established in this RAP to address the specific displacement impacts associated with the new land requirements.

[73] Considering that title deed transfers to KGM may take **at least three months** following the start of the expropriation process, and that the law grants **an additional 15 days** to affected persons to vacate the land after the finalisation of the title deed registration, providing **three months' advance notice** before the start of expropriation ensures that affected persons have **a minimum of six months and 15 days** from the date of early consultations and notification under the land acquisition process to vacate the land prior to entry.

[74] This includes potential physical displacement requirements of houses located outside the expropriation corridor, which may experience residual impacts during the operation phase, such as noise and risks to community health and safety, that may be significant and may necessitate the physical displacement of certain houses situated outside, but in close proximity to, the expropriation corridor (please see Section 3.4 for further details).

6.2. Census and Inventory of Assets

The census and asset inventory for KGM motorway projects is conducted along the entire alignment, as mandated by Türkiye's Expropriation Law and in accordance with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables (February 2019). This process identifies all land parcels – whether privately owned, legally registered to entities, or state-owned – within the motorway expropriation corridors, along with all affected structures and trees on those parcels.

The census and asset inventory works for the Antalya – Alanya Motorway Project commenced in November 2024 and have been undertaken by a national engineering firm (**valuation contractor**) appointed by the SPV, with approval from KGM. The status of completion for the asset inventory, structure identification reports, and valuation reports is detailed in Section 2.8. As of May 2025, the census and asset inventory have been completed along the full alignment, with the following exceptions:

- **Serik Connection Road and D400**: works are currently under revision due to a route change.
- **Alara**: works are partially ongoing, with approximately 50 parcels yet to be covered.
- **Akdam and Çakallar**: works are suspended pending the outcome of ongoing consultations with the affected communities.

Owners and Shareholders

In accordance with the procedures established under the Expropriation Law of Türkiye, as part of the census and inventory of assets, the legal owners and shareholders of affected land, structures, trees and where applicable are identified and included in the expropriation lists.

In the case of structures on private or public parcels, structure identification reports are prepared for each affected structure (e.g. houses, greenhouses, and other non-residential assets), and all trees are inventoried and incorporated into the expropriation plans. However, the owners of these structures and trees on public land (formal or informal land users) are not systematically recorded.

Owners and shareholders of affected assets are informed of the results of the census, inventory of assets and valuation during in-person negotiation meetings. These meetings are formally documented through signed agreement protocols or abstention records. In case of agreement, protocol is signed by both the negotiation commission and the relevant owner or shareholder.

To ensure the accuracy and completeness of the asset inventory carried out by the appointed engineering firm based on field studies, the KGM institutes a multi-tiered control mechanism. As part of this, site verifications and spot checks are carried out independently by both Regional Directorates and representatives from the General Directorate. These inspections serve to validate the inventory prepared by the national engineering firm (valuation contractor).

KGM also implements a grievance mechanism to address potential errors or omissions in the inventory of assets. Through this mechanism, affected people are able to raise grievances or objections during the negotiation meetings or submit them separately to the KGM's Regional Directorate through petitions. Upon receipt of such grievances, KGM conducts a re-examination of the concerned assets, assesses the validity of the claims, and amends the inventory where necessary.

During the negotiation meetings held in accordance with Article 8 of the Expropriation Law, the following information is shared with each owner or shareholder:

- Land registry details of the asset subject to expropriation, including the expropriated area, unit land price, and valuation criteria (e.g., debris value for trees or structures, if applicable; and any increase or decrease in the residual parcel's value)
- Detailed inventory of crops, trees, structures, wells, walls, and other improvements, along with their respective quantities and assessed values
- Ownership information pertaining to the relevant owner or shareholder
- Total compensation amount proposed for payment to the owner or shareholder

Informal Users

Under the national legal framework, the expropriation process does not mandate the census of informal users or individuals without legally recognisable rights or claims to the land or assets they occupy or use. Nevertheless, all fixed assets on private and public lands – regardless of ownership status – are identified and documented in the expropriation plans and structure identification reports prepared as part of the asset inventory process. These fixed assets may include residential, non-residential, and commercial structures, as well as trees and where applicable crops located on both private and public parcels. The data collected through this process form the basis for valuation activities conducted in accordance with the Expropriation Law of Türkiye.

In April 2025, the SPV engaged its implementation partner, SURKAL, to conduct a study to identify formal and informal users of private and public lands within the Motorway project's expropriation corridor. The resulting list includes names and contact details of the users and is maintained in the Project's database.

This list will support RAP implementation in later phases of the Project and updated regularly during RAP implementation to include any newly identified users.

In accordance with the provisions of the RAP, the SPV will inform both formal and informal users of the compensation they are entitled to – whether under national legislation (where applicable) or under the RAP – during the RAP implementation phase.

6.3. Valuation

In the Turkish legal system, there is a comprehensive legal framework regulating the acquisition of land and immovable properties and the payment of expropriation compensation under national legislation, including general provisions and laws such as the Constitution, the Expropriation Law (Law No. 2942, as amended by Law No. 4650), the Land Registry Law (Law No. 2644), the Pasture Law (Law No. 4342), the Forest Law (Law No. 6831), the Settlement Law (Law No. 2510), and the Law on the Prevention of Trespassing on Possessed Immovable Property (Law No. 3091).

According to the current Expropriation Law in Türkiye, compensation is paid within the framework of the principles specified in the Law to individuals who prove ownership or possession (titleholders or possessors) of private lands that are expropriated for public benefit, and to the relevant public institution in the case of public lands. No compensation can be granted to users or individuals benefiting from the land in other ways who are not among those specified above. Individuals who use public property without authorisation are not entitled to any portion of the expropriation compensation paid for such properties; however, compensation for any loss of income they may suffer due to the use of these lands are not considered.

There are some gaps between the Turkish legal framework governing land acquisition and the standards of IFIs. Under Turkish legislation, payment of expropriation compensation requires the person to prove ownership or possession of the land and/or structures. In contrast, IFI standards stipulate that individuals who use and generate income from the land – whether formally or informally – must be compensated regardless of whether they have legal title or not. According to IFI standards, the direct income individuals derive from the land must be taken into account, and adverse impacts on their livelihoods must be compensated.

Expropriation procedures at the KGM are administered centrally by the **Department of Immovables** at the **General Directorate** level, and locally by the **Immovables Chief Engineering Units** situated within each **Regional Directorate**. These regional units operate under the authority and oversight of the central Department of Immovables.

Based on the census and asset inventory, the initial valuation of assets has been carried out by the appointed engineering firm in accordance with the Expropriation Law and KGM's **Technical Specifications for the Services to be Procured for the Valuation of Immovables** (February 2019). As required by Law and the Technical Specifications, the valuation study has considered various factors such as current market prices, landmark court rulings, precedent sales data, and the current building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.

Further information on the following subjects is provided in the remainder of this section:

- Key valuation provisions of the Expropriation Law
- Valuation methodology of KGM
- Review of valuation study against the IFI requirements
- Future valuation updates by KGM

6.3.1. Key Valuation Provisions of the Expropriation Law

The key provisions of the Expropriation Law, particularly those related to asset valuation and compensation, are presented in Appendix B.

The valuation procedures and methods under the Law are primarily outlined in Articles 8, 11, and 12, as summarised below.

- Article 8 of the Expropriation Law sets out the principles governing the negotiated purchase method. It specifies the data sources to be used during the valuation process and provides procedural guidance. Under this Article, the expropriating authority is required to establish an internal valuation commission composed of at least three members. This commission is responsible for determining the compensation amount and conducting negotiations with the property owner to reach an agreement – either for purchase or exchange of the affected asset. The primary aim of this administrative process is to complete the expropriation through mutual agreement, thereby avoiding legal proceedings.
- Article 11 outlines the criteria for valuing land, parcels, and structures. While the Law lists the factors to be considered in the valuation process, it does not elaborate on how these criteria should be applied in practice. In effect, the interpretation and implementation of these valuation principles have largely been shaped by judicial precedents and case law rather than detailed legal provisions.
- Article 12 grants the administration the authority to expropriate either an entire immovable property or a part thereof, in conjunction with Article 46 of the Constitution as well. This is known as partial expropriation. This Article regulates how the impact on the remaining (unacquired) portion of the property should be considered in the valuation. If partial expropriation results in a decrease in the value of the remaining part – or renders it unusable – this loss must be taken into account in the compensation process.

6.3.2. **Valuation Methodology of KGM**

KGM has adopted a formal guidance document titled **"Technical Specifications for Valuation Services"**, issued in **February 2019**, which governs the scope and methodology of services procured for the valuation of immovables. These specifications outline the procedures and principles that must be followed by contracted engineering firms when performing valuation and related technical services.

The responsibilities defined in the specifications include:

- **Valuation of lands and constructible plots**, whether or not they include structures, and whether they are subject to full or partial expropriation;
- **Valuation of buildings and permanent fixtures** located on the property;
- Determination and valuation related to the **constitution of easement rights (servitude)**;
- **Exchange of immovable properties**, where applicable;
- Determination of **fees for temporary occupancy** of land;
- **Valuation of standing crops, trees, and other physical assets** present on the land;
- Classification and distinction of immovables within the expropriation zone as either **land or constructible plots**;

- Determination of **local average purchase-sale prices** for comparable parcels;
- Determination of the **capitalization rate** along the project route;
- Calculation of **diminution in value** for the **non-acquired portion** of a partially expropriated parcel.

These procedures form the basis for property valuation during land acquisition activities under KGM projects and are intended to ensure technical consistency, traceability, and fair compensation in line with national legislation.

Detailed procedures for valuation of lands, constructible plots and structures as per the Technical Specifications is provided in Appendix B.

6.3.3. Review of Project's Valuation Study

The valuation study for the Project has been reviewed by the Senior Expropriation and Valuation Expert, who is also a certified real estate appraiser and a member of the RAP Consultant Team. The expert examined the valuation reports prepared by the appointed valuation (engineering) firm, held consultations with their field teams, and reviewed the preliminary valuation report developed for the Project.

A summary of the key findings from this review is provided below as part of the RAP. The recommendations and actions identified by the expert have been appropriately incorporated into the RAP – Entitlements Matrix (see Section 7.2) to ensure consistency with applicable standards and best practices.

- Valuation of Agricultural Lands:

  Valuation reports for the Project have been prepared only for the following route sections, while reports for the remaining sections – where asset inventories have been completed – are still under preparation:

  - 52+000 – 56+000
  - 64+242.51 – 64+721.89, and
  - 80+416 – 80+656.92

  A preliminary valuation report was available for review as part of the RAP study. The content of the includes the following:

1. Identification of crops, trees, and structures located within the expropriation corridor

   ii) Distinction between constructible plots and agricultural land

   iii) List of transacted parcels and parcel types subject to expropriation

   iv) Calculation of the capitalisation rate

   v) Range of applicable capitalisation rates along the corridor

   vi) Yield and gross production values of key crops grown along the route

   vii) Unit values assessed for irrigated farmland

   viii) Comparison of data collected during the valuation study with data from the District Directorate of Agriculture and Forestry

   ix) Income and expenditure tables by crop type, based on survey averages

   x) Profiles and data of surveyed producers

   The final valuation report for the Project is yet to be prepared. It is assumed that the valuation work in the Project is being carried out in accordance with KGM's Technical Specifications, whose processes and methodologies are generally considered to be consistent with International Valuation Standards.

As is the case with all "Immovables Valuation Engineering Service Contracts" commissioned by KGM, **a final valuation report must be submitted** following the completion of field identification and inventory of assets, data collection, and valuation activities.

The final valuation report to be prepared for the Antalya – Alanya Motorway corridor must include detailed explanations of, at a minimum, the following topics:

- Methods used for mapping the expropriation boundaries and identifying appurtenant structures
- Methods for estimating production costs and net income (rents)
- Valuation methods for fruit orchards
- Methods for determining the capitalization rate
- Calculation of the average capitalization rate
- Methods applied in the valuation of constructible plots
- Methods used in the valuation of structures

The alignment of the Project's valuation activities with KGM's Technical Specifications and the required methodology will be verified by a third-party valuation expert following the completion of the final valuation report, which is expected to be finalized in Q3 2025.

- Valuation of Orchards:

Methodology: The Regional Directorate does not consider orchard-based ("*kapama bahçe*") valuation calculations, and instead, bases its reports on the unit values for trees declared by the Provincial and District Directorates of Agriculture and Forestry, while separately calculating the base (field) value of the land. While this approach is not inherently unreasonable, it limits the transparency and scientific accuracy of the valuation process. The declared tree values are determined without applying the income approach and are often based on assumptions.

These assigned unit values for trees may occasionally align with those derived using scientific methods (i.e., applying the net income approach to orchard production data), but they may also be significantly higher or lower. The Regional Directorate justifies their preference for this approach by explaining that local farmers are more concerned with how many individual trees will be lost from their parcels due to expropriation, rather than the concept of consolidated orchard valuation.

The Agriculture and Forestry Directorates across Türkiye tend to assign higher tree values as tree age increases, which is not consistent with the logic of the income approach. According to this method, the unit value of a tree is highest at the start of its productive phase and should decline with age as productivity diminishes.

The valuation contractor applies orchard-based valuation methods. However, the Regional Directorate does not incorporate those figures into their official valuation. Based on the information provided by the valuation (engineering) firm regarding the methodology applied in the valuation methodology for fruit orchards, it has been understood that for the valuation of **productive (orchard-type) fruit gardens**, the firm applied the **Capitalization of Periodic Fixed Income** method, with relevant formulas provided in the relevant documentation. The valuation approach is based on the **Future Value** method, which was used to determine the value of such orchards. From the formulas and the example provided for a **productive olive orchard**, it has been concluded that the valuation contractor employed a **scientifically grounded methodology** in valuing orchard-type fruit gardens.

The Senior Expropriation and Valuation Expert of the RAP Consultant Team requested the valuation contractor (national engineering firm) to **carry out calculations and comparison of the unit tree values resulting from the orchard-based calculations for established fruit orchards with the**

unit tree values intended to be used by the 13th Regional Directorate and determine whether the scientifically calculated tree values fall below those values. Over the RAP preparation period, the valuation contractor completed the calculations for **olive and orange trees** and submitted the results for review by the Senior Expropriation and Valuation Expert of the RAP Consultant Team. The unit tree values for olive and orange have been compared with the unit tree values considered by the 13th Regional Directorate, which are based on figures provided by the Antalya Provincial Directorate of Agriculture and Forestry. The comparison revealed that for olive trees, the unit values used by KGM's 13th Regional Directorate are higher than those calculated by the valuation contractor through orchard-based calculation method for all age groups.

For orange trees, **figures calculated through orchard-based method were found to be higher for ages 5, 6, 7, and 8, whereas for all other age groups (from 9 to 40), the KGM 13th Regional Directorate's unit tree values are higher.**

In summary, the valuation contractor conducted its calculations for olive and orange based on the income approach and over established orchards; however, it was observed that no such calculation was made for other fruits identified during the assessments (e.g., grape, avocado, apricot, pomegranate, banana, dragon fruit, etc.). Calculations based on the income approach must also be conducted for these mentioned fruits, and the differences with the unit tree values used by the KGM 13th Regional Directorate must be presented, to verify whether the Directorate's figures fall below those calculated using scientific valuation methodologies. These recommendations of the Senior Expropriation and Valuation Expert of the RAP Consultant Team have been incorporated into the Entitlements Matrix provided in Section 7.3.

Dense Planting Issue: KGM's 13th Regional Directorate applies a regional-directorate specific **dense planting** ("*sık dikim*") **ratio** when calculating compensation for trees. In this approach, if the total number of trees on a parcel, when divided by the expropriated area, exceeds a certain value, the compensation values obtained from the Provincial Directorate of Agriculture and Forestry is reduced.

In fruit orchards, proper planting distances must be maintained to allow root development and access to sufficient sunlight. Correct spacing reduces competition among saplings, ensuring optimal growth conditions. However, compared to other regions in Türkiye, the Antalya region receives the highest duration of sunlight. Therefore, planting densities considered optimal in other regions might appear sparse in Antalya. In fact, local producers, based on past experience and trial-and-error, have learned to plant fruit trees more densely, which is a reality that must be acknowledged as part of valuation and delivery of compensation.

The Senior Expropriation and Valuation Expert of the RAP Consultant Team (Agricultural Economist and Certified Real Estate Valuation Expert) reviewed and assessed the extent of compensation reductions applied by KGM's 13th Regional Directorate as part of the RAP stduy. As valuation reports for the entire route have not yet been completed, an approximate estimate has been made based on a review of the available reports.

For example, in the completed valuation section between kilometers 92 and 104 (Serik–Alanya section), a comparison was made between the total tree compensation that should have been paid and the amount calculated by the Directorate after applying dense planting reductions. The affected settlements in this section include Aksaz, Cevizler, Demirciler, Hacıali, Hacıisalı, Hacıobası, Karaöz, and Sülek neighborhoods. Tree compensation was calculated based on the identified age, species, and quantity of both fruit-bearing and non-fruit-bearing trees, and the gap between the total compensation calculated by KGM 13th Region with the dense planting adjustment and the rightful compensation that should have been paid for the trees in this section has been assessed and extrapolated to the full alignment. This assessment assumed that tree types and densities across the rest of the route are proportionally similar to those found in the sample section.

The gap between KGM's compensation and the rightful compensation has been included in the RAP Fund and will be provided by the SPV as a top-up compensation, as described under Entitlements Matrix (Section 7.3).

- Valuation of Constructible Plots:

The valuation (engineering) firm has prepared separate reports for constructible plots. Based on the available reports and information obtained from the valuation team, it was noted that parcels subject to expropriation and located within the 1/1000-scale zoning plan boundaries of the respective municipalities were identified. The land use status of these parcels (e.g., residential, industrial, commercial) was verified through the relevant municipal directorates of zoning and urban planning, in order to determine the appropriate comparable plot types for benchmarking.

All land sale transactions for the past three years were obtained from the respective Land Registry Directorates, and the zoning characteristics of transacted plots were again confirmed with the municipal zoning departments. Efforts were also made to contact buyers and/or sellers, and unit values were derived based on their input when available. Based on the consultations with the valuation team, it has been understood that adjustments to unit values of comparable plots were made in accordance with the instructions provided in KGM's Technical Specifications for Real Estate Valuation Engineering Services.

One critical aspect in the valuation of constructible plots is the assessment of any value reduction in the remaining portion of the land after partial expropriation. For such assessments, the land use function (e.g., residential, commercial, industrial) of the remaining plot must be considered, along with its potential characteristics (e.g., shape, setback distances, potential for revision in zoning). If the remaining plot is not revised by the municipality and its value reduction is not adequately reflected in the compensation, landowners may be negatively affected. It is therefore recommended that KGM carefully review valuation results in such cases and respond with sensitivity to these impacts.

Additionally, Article 19, Paragraph 1 of Law No. 6001 on the Services of the KGM states: "*The General Directorate shall prepare the plans for highways included in the motorway, state, and provincial road networks, as well as their revisions, and request that these be incorporated into zoning plans by municipalities or relevant institutions if they fall within municipal or adjacent areas. Objections to these plans must be submitted within 30 days. If no objection is submitted, the route plans become final and binding for relevant institutions for inclusion in zoning plans. If objections are submitted, they are evaluated and finalized by the General Directorate within 20 days.*"

This indicates that municipalities are required to amend their zoning plans accordingly. Likewise, Article 26(6)(d) of the Regulation on Spatial Plans, published in the Official Gazette on 14 June 2014, states: *"Any changes to highways under the responsibility of the KGM must comply with the opinion of this authority."*

In cases where the remaining part of the parcel lies within a 1/1000-scale implementation plan zone and has not yet been subjected to a zoning implementation procedure (Article 18 of the Zoning Law), it can be assumed that landowners will not be adversely affected by a subsequent zoning revision. This is supported by the Court of Cassation 5th Civil Chamber ruling (E.2002/2825, K.2002/9465), which states: "*A cadastral parcel that has not yet been converted into a zoning parcel will not suffer a value loss, as the remaining part will be evaluated together with other parcels during the zoning adjustment process.*"

However, in cases where a zoning parcel has already undergone road relinquishment, it is recommended that a third-party valuation expert conducts a fair assessment of value reduction in the remaining part becomes especially important, as discussed in the previous paragraph.

- Valuation of Structures

The preliminary valuation report has not yet integrated information on building valuation. Through consultations held with the technical team at KGM's 13th Regional Directorate, Department of Immovables, it has confirmed that:

  - Buildings identified along the route are first classified according to their intended use and structural characteristics;

- For buildings with measurable floor areas (m²), the valuation is based on unit construction costs published by the Ministry of Environment, Urbanisation and Climate Change for the year 2025;
- Depreciation is applied using the "Depreciation Rates Table" published in the Official Gazette No. 17886 on 2 December 1982, taking into account the age of the structure; and
- If the building has salvageable value and the owner requests it, the salvage value may be deducted after applying depreciation and adjusting for incomplete construction, if applicable.

6.3.4. Future Valuation Updates

Based on the Detailed Work Schedule prepared by the SPV and approved by KGM on 20 March 2025, the expropriation process for the Project – including both expropriation payments under Article 8 and the deposit of land seizure fees under Article 27 – is planned to be carried out by KGM on a lot-by-lot basis. This will be aligned with the Project's construction schedule and subject to the availability of the expropriation budget. The expropriation programme will be aligned with the construction schedule, subject to the availability of the expropriation budget and approval by KGM.

KGM typically updates the valuation rates for land and assets **at least annually**. This said, it should be noted that, in the section of the Project route where the valuation has already been completed, the appraisal was carried out based on data from the 2024 production year. Accordingly, the average annual net income of the lands and the resulting expropriation compensation amounts were calculated using prices from that period.

Since the production and marketing (cash inflows and outflows) of many agricultural products typically take place in the autumn season, the income and expenditure figures determined using 2024 data may still be valid throughout the first nine months of 2025. However, after this period (i.e., from September 2025 onward), changes in land income are expected due to developments in input and product prices. Thus, it will be necessary to update the valuations using data from the 2025 production year. The SPV – General Manager has informed KGM – Head of Immovables Department through a face to face meeting held in Ankara on 13 June 2025 and the Department Head confirmed that the valuation updates in the Project will be undertaken on a **quarterly** basis.

Accordingly, in Q3 2025, the SPV will commission the valuation contractor (national engineering firm) to collect, analyse, and update the 2025 income-expenditure data from landowners/users cultivating relevant crops along the project route, under the supervision of KGM. The SPV will then submit the collected data to KGM requesting valuation update by **September 2025**, as necessary.

Indeed, it is possible to determine 2025 unit land values by analyzing data collected from at least one producer per district for irrigated farmland crops in the region. These data can also be obtained from the District Directorates of Agriculture and Forestry; however, their 2025 data are generally not finalised until the end of the year. Therefore, it may be feasible for the valuation contractor to reach these figures through field and office studies. It is sometimes observed that expropriating institutions attempt to update 2024 data by adjusting the valuation using Producer Price Index (PPI) or Consumer Price Index (CPI) indices to reflect the relevant month of the current year. However, this is not an appropriate approach.

The following factors are typically considered in these valuation updates:

- Since agricultural data changes every year, land prices (based on cost and income) are updated according to agricultural data announced by the directorates of agriculture in the early months of the year.
- As for plots (zoned land), since valuation is done using the comparable sales method, updates are made as market transaction values change. The general practice is to set the price at the beginning of the year and use the same prices until the end of the year.
- For buildings, updates are made based on the approximate construction unit costs published in the Official Gazette in the first months of each year (except for years with high inflation, when these unit costs have been published twice a year in the Official Gazette).
- The prices can be updated at any time by considering market conditions and inflation effects – subject to approval by Directorate General of KGM.

6.4. Avoidance of Forced Eviction and Procedure for Lawful Evictions

The term forced eviction is defined by IFC GN5 (2012) as "*The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.*"

The SPV is committed to avoiding forced eviction throughout the land acquisition and expropriation process and complying with the relevant requirements of the international standards, through the measures to be taken in coordination with KGM.

However, if eviction becomes unavoidable despite prior engagement and the enhanced information and consultation process, the SPV will submit a formal request to KGM to proceed with the eviction of expropriated properties and KGM Regional Directorate will execute the eviction of expropriated properties in accordance with Article 20 of the Expropriation Law.

The SPV will implement feasible measures before, during, and after the eviction process, as outlined in Table 6-1, but will avoid direct involvement in eviction process undertaken by KGM.

Table 6-1. Procedure to be followed by KGM for Lawful Eviction of Expropriated Properties and Measures to be taken by SPV when to Eviction by KGM is Unavoidable

No.	**Steps to be followed by KGM in case of Lawful Eviction** in accordance with Expropriation Law – Article 20	**Measures to be taken by SPV**
Prior to Eviction		
2.	• KGM will not carry out any additional engagement activities **prior to eviction**, other than the negotiations conducted under Article 8 of the Expropriation Law.	• The SPV will increase engagement with those involved before eviction is considered, providing genuine opportunities for dialogue with no pressure or coercion exerted, and document all engagement and attempts at reaching a reasonable agreement prior to eviction: - GLAC: Upon approval of this RAP by the Lenders, a GLAC, providing a concise, clear, and non-technical summary of the RAP, will be distributed and presented to affected people to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 27 – their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements. - Enhanced Information and Consultation: The SPV and KGM will jointly implement enhanced communication strategies, as outlined in Chapter 10, to ensure affected persons understand; (i) the expropriation process and their legal rights, (ii) compensation mechanisms provided by KGM; and (iii) additional entitlements and support available through the RAP Fund managed by the SPV. • The SPV will avoid changing the compensation entitlements established in the RAP and negotiated with other affected persons, which would raise a risk of unfairness and increase the risk of conflict with others. - The entitlements included in the RAP and presented to affected people through GLAC will be strictly followed. • The SPV will provide full information on legal avenues available to those affected, best conveyed by an independent party, and mediation services and legal aid to those in need of it to seek redress, at no cost to those affected. - Project-specific Grievance Mechanism: The SPV will ensure that the affected persons have access to the Project-specific Grievance Mechanism, which includes an Appeal Mechanism, throughout the expropriation and RAP implementation periods. • Prior to eviction, the SPV will ensure adequate and reasonable notice to all affected persons:

No.	Steps to be followed by KGM in case of Lawful Eviction in accordance with Expropriation Law – Article 20	Measures to be taken by SPV
		- Early Consultations and Notification for Land Acquisition Process: Affected houses and businesses: The SPV will notify the owners and tenants of affected structures at least **three months**[75] 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 for resettlement planning, including the relocation arrangements of affected businesses. In cases where expropriation has already been **concluded**, the SPV will inform property owners of the Project schedule, and each owner will be granted a **six-month** notice period to vacate the property following notification. 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 or land entry protocols with landowners and users. • The SPV will ensure that reasonable **temporary accommodation** is provided to those evicted should they not have an alternative place to stay. - During the early consultation and notification phase of the land acquisition process, the SPV will engage with affected individuals to identify any temporary accommodation needs and will make the necessary arrangements accordingly, if required.
1.	• KGM Regional Directorate – **Department of Immovables** (administration) submits the eviction request to the Legal Department, along with the relevant expropriation documentation for the properties to be vacated.	• If eviction becomes unavoidable despite prior engagement and the enhanced information and consultation process, the SPV will submit a formal request to KGM to proceed with the eviction of expropriated properties. This request will: - Include a reference to the requirements of IFC PS5 regarding lawful evictions - Refer to the Project-specific Human Rights Policy, - Emphasize the need for KGM to coordinate with public security forces to ensure that no disproportionate force is used during the process - Request KGM to ensure that evictions are not to take place in bad weather or at night; specific care is taken of vulnerable people, particularly disabled or sick individuals, pregnant or lactating women, young children, the elderly, and those that are at risk of gender-based violence • The SPV will inform the Lenders and the IESC in advance of the request for eviction process.
2.	• KGM Regional Directorate – **Legal Department** informs the executive office ("*İcra Müdürlüğü*") at the relevant Court of Justice ("*Adliye*") about the properties to be vacated and formally requests their eviction, through the National Judiciary Informatics System (UYAP).	
3.	• The executive office sends a registered letter with return receipt to the property owners, giving them a **15-day** notice, in accordance with the Expropriation Law – Article 20.	
4.	• According to the Law, written notification is sufficient. However, in small settlements, verbal notification can also be given by visiting the location.	

[75] Considering that title deed transfers to KGM may take **at least three months** following the start of the expropriation process, and that the law grants **an additional 15 days** to affected persons to vacate the land after the finalisation of the title deed registration, providing **three months' advance notice** before the start of expropriation ensures that affected persons have **a minimum of six months and 15 days** from the date of early consultations and notification under the land acquisition process to vacate the land prior to entry.

No.	**Steps to be followed by KGM in case of Lawful Eviction** in accordance with Expropriation Law – Article 20	**Measures to be taken by SPV**
	In such cases, to identify the user of the property, a joint visit to the site is conducted either before or after the official notification. This visit is carried out by law enforcement officers, an enforcement officer, a KGM lawyer, and personnel capable of identifying the location of the property (e.g., a staff member from the Department of Immovables). During this visit, the user and any structures subject to eviction are identified, and an official record is prepared.	
During Eviction		
5.	• After 15 days, the eviction procedure is initiated by the administration's lawyer, the relevant executive officer, and depending on the condition of the property, workers and law enforcement officers (if requested). They visit the property to check whether it has been vacated; if not, eviction is carried out. If eviction is carried out through enforcement, the enforcement costs are charged to the property owner. • The belongings of the evicted households are moved to a trustee (custodian) appointed in advance. The costs of the trustee and laborers are charged to the property owner.	• The SPV will avoid direct involvement in implementing evictions and exercise caution and monitor the process to avoid reputational and operational risks. • The SPV will coordinate with KGM to provide independent medical assistance, subject to approval by the relevant authorities. • The SPV will cover the cost of trustee.
After Eviction		
6.	• KGM will not carry out any additional engagement activities or provide additional measures after the eviction.	• The SPV, with support from third-party implementation partners and consultants, will continue to monitor the conditions of individuals who have been evicted and will document their circumstances in periodic internal RAP monitoring reports submitted to the Lenders.

7. Eligibility and Entitlements

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "***Eligibility*** *includes a definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cutoff dates*" and "***Entitlement*** *describes all categories of affected persons and the options that they are being offered for all losses (including compensation, allowances, assistance and livelihood-restoration measures, resettlement housing). This is preferably provided in tabular form (entitlement matrix).*"

7.1. Eligibility

The Expropriation Law of Türkiye recognises the **legal** owners and shareholders of affected assets, as well as **formal users** of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – "*ecrimisil*"), as eligible for compensation.

Regarding the compensation of **informal users**, the Expropriation Law – Article 19 ("Registration of immovable properties not recorded in the land registry and the rights of the possessor") stipulates that in the expropriation of properties that are registered under someone else's name, ownerless, and/or not acquired by the possessor, the minimum material cost of buildings and the value of trees as appraised under Article 11 are paid to the possessor. This does not include informal users of forest and pasture parcels.

The census and asset inventory by KGM identifies legal owners and shareholders, as well as all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation.

Eligibility under RAP

The eligibility categories of displaced people as defined by IFC PS5, and the eligibility of people falling into respective categories under Expropriation Law is summarized in Table 7-1.

All affected persons falling within these three categories are eligible for compensation and/or assistance under this RAP, tailored to their specific impact category, as detailed in Section 7.3 – Entitlements Matrix.

Table 7-1. Eligibility Categories under IFC PS5 and Corresponding Provisions under Turkish Expropriation Law

Eligibility Categories according to IFC PS5	Eligibility of Corresponding People under Expropriation Law
(i) who have formal legal rights to the land or assets they occupy or use;	Affected people falling into this category are eligible for compensation under Expropriation Law. This includes formal users of state-owned lands, who may receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself.
(ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognizable under national law[76]	Affected people falling into this category, such as informal users of treasury who pay adequate pay ("ecrimisil") for their informal occupation, are eligible for compensation for their affected structures – **based on minimum material cost** ("*205ndivi levazım bedeli*") – and trees under Expropriation Law – Article 19. No compensation is provided for the land itself. The Expropriation Law of Türkiye recognises possessor ("*zilyet*") rights where there is no title deed (in the absence of cadastral surveys). However, in the area where the Antalya-Alanya Motorway route passes, the cadastral works along the expropriation corridor have been completed by TKGM and there are no parcels without title deed registration; hence, no possessory ("*zilyet*") rights exist in this Project.
(iii) who have no recognisable legal right or claim to the land or assets they occupy or use.	Affected people falling into this category – such as informal users of forest and pasture lands are considered as **illegal occupants** ("*işgalci*"), are not entitled to any form of legal compensation for either the land or the assets.

[76] Such claims could be derived from adverse possession or from customary or traditional tenure arrangements.

The categories of eligible people under RAP, as aligned with the Impact Categories given in Table 3-2 and the Entitlements Matrix provided in Table 7-5, is presented in Table 7-2[77]. This includes owners and shareholders, as well as formal and informal users of affected lands and structures (such as affected houses, business structures, greenhouses), owners of trees, business operators and their formal and informal employees, among others.

The RAP is a living document and will be revised, as needed, to incorporate any additional categories of affected people or other individuals identified as affected during the course of RAP implementation.

In accordance with international standards, **individuals who encroach upon the Project area after the cut-off date will not be eligible** for compensation or assistance under this RAP.

Table 7-2. Categories of Eligible People under RAP

Impact Category	Eligible People Categories
(i) Affected Lands	
Permanent loss of private parcels – agricultural parcels and constructible plots[78] (urban lands)	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Litigous properties ("*ihtilaflı bulunan mülkiyet*")	Litigant owners/shareholders of litigious properties
	Formal and informal users of litigious parcels
Orphan lands	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Permanent loss of state-owned treasury parcels (e.g. treasury, registered pasture lands, non-registered parcels) which are used for agriculture(	Owners
	Formal users with official documentation
	Informal users with no official documentation
Permanent loss of forest land	Users of forest lands
Permanent loss of treasury – pasture lands	Users of affected parcels for grazing
Restriction of access to grazing lands – located out of Project expropriation corridor (public or private) due to fragmentation	Users of grazing lands
Loss of crops	Owners of the crops (owner or formal/informal user of the land)
Loss of trees (fruit or non-fruit trees)	Owners of the trees (owner or formal/informal user of the land)
Loss of assets or infrastructure on affected private parcels (non-residential secondary structures, fences, barns, sheds)	Owners of non-residential structures and infrastructure who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures and infrastructure who are informal users of private lands (with no title deed but can prove their ownership of the structure)
	Owners of non-residential structures and infrastructure who are informal users of private lands (with no official documentation proving their ownership of the structure)
Loss of assets or infrastructure on affected public lands (non-residential/ secondary structures, fences, barns, sheds)	Owners of non-residential structures and infrastructure who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures and infrastructure who are informal users of state lands (with no official documentation for land use but can prove their ownership of the structure)
	Owners of non-residential structures and infrastructure on forestry and pasture lands or owners with no official documentation proving their ownership of the structure
Constitution of servitude (easement leading to loss of value of the immovable)	Owners of the parcels to be acquired through constitution of servitude (easement rights)

[77] The content of this table is same with the content of Table 3-2 on potential impacts of land acquisition.

[78] Urban lands which are parcelled by the municipalities within the municipal boundaries are regarded as constructible plot (in Turkish "*arsa*") as per the Real Estate Tax Law of Türkiye (Law No. 1319, Article 12). Designation of lands as constructible plot (urban land or *arsa*), which have not been parcelled inside or outside the municipal boundaries, is decided by Presidential Decree or other legal arrangements as applicable.

Impact Category	Eligible People Categories
(ii) Affected Houses	
Loss of residential houses /structures	Owner of affected house
	Formal user (formal tenant)
	Informal users
(iii) Affected Greenhouses	
Greenhouse owners – that would relocate	Owner of greenhouse (owner or formal/informal user of the land)
	Employees of greenhouses (formal or informal)
Greenhouse owners – that terminate operations	Owner of greenhouse (owner or formal/informal user of the land)
	Employees of greenhouses (formal or informal)
Greenhouse owners – that will not relocate but may experience partial loss of land/assets	Owner of greenhouse (owner or formal/informal user of the land)
	Employees of greenhouses (formal or informal)
(iv) Affected Businesses	
Business owners – which would terminate operations (business shut-down)	
Business owners – that will not relocate but may experience partial loss of land/assets	Not a business owner at the affected business structure but the owner of the affected building
Business owners – which will be resettled permanently	Formal business owner – "owner" of the affected business structure
	Informal business owner – "owner" of the affected business structure
	Formal business owner – "tenant" of the affected business structure
	Informal business owner – "tenant" of the affected business structure
Business owners – which would terminate operations (business shut-down)	Same as above
Business owners – that will not be relocated but may experience partial loss of land/assets	Same as above
Employees	
Temporary income loss by the employees – due to (iii) Being sent by the business owner to unpaid leave during business interruption period (iv) Delayed salary payment during business interruption period	Formal employees of affected businesses (incl. employees with vulnerabilities such as disabled and migrant)
	Informal employees of affected businesses including employees with vulnerabilities such as disabled and migrant)
Permanent income loss by the employees – due to (iv) Permanent business shut-down; (v) Dismissal/ termination of employment contract by the business owners; or (vi) Resignation by the employees as the business relocates to a remote location	Formal and informal employees including vulnerable workers and women
(v) Vulnerable People	
Affected households with vulnerable members – may be exposed to any type of loss/impact given for the above PAP Categories with a more significant level of impact due to vulnerability or disadvantaged conditions	All physically and economically displaced households with vulnerable members
	Physically displaced households with vulnerable members (under any vulnerability category)
	Economic: • Green card[79] holder • People receiving governmental aid • Unemployed • Employed without Social Security
	Gender-based:

[79] Health card provided as per the national Regulation on the State Coverage of Healthcare Expenses for Citizens who Cannot Afford to Pay and the Green Card System (type and content of the card is determined as per the Regulation).

Impact Category	Eligible People Categories
	• Female head of HH without an economically active adult man in the household • Female head of HH with an economically active adult man in the household Based on age: • Elderly people (over 65) in need of care • Children household head (under 18) Sickness, physical or mental disability: • Chronical disease • Physical disability • Mental disability Households with children: • Children with special needs • Unschooled children at school • Ethnic minority, belonging to other religions
	Based on literacy: Illiterate persons
	Migrant
	Households who do not own any agricultural land
	Cumulative impacts: Households whose income is land based and disproportionately affected due to cumulative impacts on their lands
Vulnerable employees	• Informal employees (Employees who are not registered by their Business owner at the workplace under the Social Insurance and Universal Health Insurance Law (No. 5510) of Turkey). • Migrant employees (formal and informal) • Physically disabled / handicapped employee • Chronically ill employee • Elderly workers (over 65) in need of care • Women employees with vulnerabilities (e.g. single women with children, etc.) • Employees with vulnerable household members (e.g. disabled) • No children (15-18 ages) were reported to be employed at the affected businesses
(vi) Temporary Losses/Impacts During Construction	
Temporary loss of private parcels during construction (including access restrictions)	Owners/shareholders
	Formal users (formal tenants)
	Informal users
Temporary loss of state-owned parcels during construction (including access restrictions)	Owners (Governmental institutions)
	Formal users (formal tenants)
	Informal users
Non-land related livelihood losses due to construction	Owners and formal/informal users of lands and assets – as applicable
Temporary interruption/disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any
(vii) Impacts During Operation	
Operation phase E&S impacts (e.g. operation noise, vibration, air quality, community health and safety)	Owners and/or formal/informal users of residential structures/houses for which impacts cannot be mitigated to levels compliant with Project standards through operation phase management plans

Project Affected People (PAP) Database

As mentioned in 3.2.1.5, during the RAP process, the development of a **Project Affected People (PAP) Database for Land Acquisition** was initiated. This database incorporates information on owners and shareholders identified by the KGM (through national engineering firm/valuation contractor) through the census and asset inventory process, as well as formal and informal users of affected lands, structures (such as houses, business premises, and greenhouses), and trees, identified by the RAP Consultant Team and the Project CLOs during the RAP field surveys in May 2025. The database also includes contact information and information on any identified vulnerabilities among affected people.

The **PAP Database** is designed as a **living document** and will be **regularly updated by the SPV** throughout RAP implementation to reflect any newly identified users or changes in circumstances.

Confirmation of Eligibility during RAP Implementation

A RAP Fund Implementation Procedure, including detailed description of eligibility criteria, will be prepared and put in place by the SPV following approval of the RAP by the Lenders. This document will align with the SPV's corporate procedures concerning the management of administrative affairs, employment, and procurement processes.

During RAP implementation, the SPV – RAP Implementation Team will establish a transparent and well-communicated mechanism for delivering entitlements to eligible affected people. The affected people will be informed about the required documentation for eligibility evaluation, as well as the overall evaluation and implementation process, including the grievance mechanism through the GLAC to be distributed to affected people. Eligibility will be assessed on a case-by-case basis.

The documentation to be requested from affected people for the evaluation of eligibility for entitlements may include, but is not limited to, the ones listed in Table 7-3.

The SPV will work closely with affected households and business owners throughout the relocation process. This support may include coordinating services such as hiring real estate agencies, transportation firms, and logistics providers for the disassembly, transport, and reassembly of movable property, machinery, and equipment.

The affected people will be clearly informed in advance about which costs are eligible for reimbursement. The SPV will provide guidance on acceptable expenditures and the proper documentation required to support them. Affected people will be advised to retain and submit all relevant receipts and proof of payment. For any costs that are to be reimbursed after they are incurred, the SPV's prior approval of the expenditure will be mandatory. Supporting documentation must be submitted by PAPs before any reimbursement is processed.

The SPV will oversee the submission and approval of all relocation-related expenses – such as moving and transaction costs – before the relocation takes place. All coordination will be carried out in line with the SPV's corporate procedures for administrative affairs and procurement.

Table 7-3. Examples of Required Documentation for Eligibility Assessment

Impact Category	Affected People Category	Examples of Required Documentation for Eligibility Assessment
Affected lands	Owners	- Official documentation of ownership for the affected assets (e.g., land registry records/title deeds, inheritance documents) - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs
	Formal agricultural users	- Farmers Registry System registration - Tenancy agreements - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs
	Informal agricultural users	- Information from the asset inventory survey - Evidence/confirmation of land use provided by settlement heads, community leaders, and other credible witnesses or third parties - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs
Affected houses	House owners	- Title deeds for affected land and structures - 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 - Evidence of expenditures made for fixed investments and improvements
	Tenants	- Lease agreements (for formal renters) and relevant documentation/confirmation from the structure owner, mukhtar or other credible witnesses - 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 - Evidence of expenditures made for fixed investments and improvements
Affected Businesses	**Business owners**	- Title deeds for affected business structures (for structure owners) or lease agreements (for formal renters) - Legal company documentation - Financial records, accounting documents, social security registration, permitting documentation, etc. - Documentation of moving and transaction costs, including fees paid to authorities and service providers, and price offers/quotes as requested by the SPV and other transaction costs - Evidence of expenditures made for fixed investments and improvements

7.2. Cut-off Date

According to IFC[80], "***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 intent of the cutoff date is to avoid opportunistic settlement or construction of new structures by existing households (in the expectation of compensation) in the area earmarked for project use*".

In establishing the cut-off date for the Project, the key requirements of IFC PS5, as outlined below, have been taken into account.

IFC PS5 – Paragraphs 12 and 23

Para. 12. "In the absence of host government procedures, the client will establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and disseminated throughout the project area."

Para. 23. "The client is not required to compensate or assist those who encroach on the project area after the cut-off date for eligibility, provided the cut-off date has been clearly established and made public."

The Expropriation Law of Türkiye provides a cut-off date definition applicable to the owners and shareholders of properties, as provided below.

Article 25 – Restriction of Rights and Transfer of Ownership to the Administration

"In terms of the exercise of rights and the fulfilment of obligations, the expropriation process begins for the property owner with the court notification issued in accordance with Article 10. The transfer of ownership to the administration takes place through the registration decision rendered by the court.

From the date of the court's registration decision, the property owner's rights to use the expropriated immovable – such as constructing new buildings, planting crops, or making significant modifications to existing structures – are terminated. Any additions made thereafter are not taken into account in the valuation.

In large-scale infrastructure projects extending over multiple years – such as dams, irrigation systems and pipelines, highways, railways, ports, and airports – the public benefit decision is announced by posting it in the neighbourhood and/or village headman's office where the expropriated properties are located, for a period of fifteen days. From the end of the announcement period of the public benefit decision, any fixed installations made or trees planted on the expropriated properties are not considered in the determination of the expropriation compensation.

This **cut-off** restriction on the immovable properties remains valid for five years from the end date of the public announcement."

Table 7-4 provides a summary of the public benefit and accelerated expropriation decisions issued to date for the Project.

Table 7-4. Existing Public Benefit and Accelerated Expropriation Decisions

Decision Type	Executing Authority	Decision Date	Decision No.	Scope of the Decision
Public Benefit Decision	MoTI	28 November 2023	2023/371	Antalya – Alanya Motorway including the connection roads
Accelerated Expropriation Decision	Presidency	29 March 2025[81]	9708	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)

Information Mechanisms under Expropriation Law

[80] https://www.ifc.org/content/dam/ifc/doc/2023/ifc-handbook-for-land-acquisition-and-involuntary-resettlement.pdf

[81] The decision was published in the Official Gazette (No. 32857) on 30 March 2025 at: https://www.resmigazete.gov.tr/eskiler/2025/03/20250330-5.pdf

The mechanisms through which the people affected by Project-related land acquisition are informed about the asset inventory process and the cut-off date after which newly installed assets will not be compensated are summarised below:

- Turkish Electronic Government Platform: In accordance with Article 7 of the Expropriation Law, annotations related to expropriation are added to the title deeds of affected assets. Asset owners and shareholders can access this information through the Turkish electronic government platform (https://www.turkiye.gov.tr).

- On-site Inventory of Assets Studies: As part of the identification and inventory studies conducted on site in accordance with the Expropriation Law, the boundaries of the expropriation corridor were physically demarcated by field teams using ground stakes. This process served to clearly define the limits of the affected area.

  During the resettlement scoping field visit carried out by the RAP Consultant Team in April 2025, all interviewed affected persons – including landowners, formal and informal users, as well as owners or tenants of affected business structures – confirmed their awareness of these boundary markers and, consequently, of the expropriation corridor limits.



Figure 7-1. Examples of Expropriation Corridor Boundary Markers in Affected Settlements

During on-site inventory studies, local mukhtars and asset owners and shareholders that are present in the affected settlements accompany the field inventory teams. This process involves continuous communication between the appointed national engineering firm (valuation contractor) and affected communities.

During these studies, verbal notifications are given to affected people stating that any assets installed on the affected parcels after the date of the inventory will not be eligible for compensation under the Expropriation Law.

- Negotiation Meetings and Grievance Mechanism: During the negotiation meetings held by KGM in accordance with the Expropriation Law, owners and shareholders are provided with the list of assets subject to expropriation and their valuation.

  Upon agreement with KGM, PAPs sign the inventory of assets. A formal grievance mechanism allows affected owners and shareholder to raise objections regarding inaccuracies or omissions in the asset inventory, either during negotiations or afterward. If a grievance is submitted, KGM revisits and reassesses the asset inventory and makes necessary corrections.

- Legal Proceedings for Disagreement Cases: In cases where affected owners or shareholders do not attend negotiation meetings or fail to reach an agreement with KGM, court proceedings are initiated by KGM in accordance with the Expropriation Law.

  The timing of legal action is determined by KGM based on the construction schedule agreed with the SPV and the availability of expropriation funds. Courts revalidate or redo the inventory of assets during the proceedings. Affected owners and shareholders may also raise objections during the judicial process.

Additional Mechanisms adopted by the SPV

To meet the additional requirement of PS5 regarding the disclosure of the **cutoff date and its conditions** (e.g., prohibition on new structures, trees, or crops), the SPV has undertaken the following actions:

- Since the government cutoff date, declaration of public interest and accelerated expropriation decision, has been established but not disclosed as required by IFC PS5, **the SPV, in consultation with the KGM, has decided to establish a new cut-off date for each settlement affected by Project-related land acquisition**. The cut-off dates are determined based on the completion date of the census and asset inventory surveys conducted in each respective settlement, following a “rolling” cutoff date approach, whereby the cutoff is specific to each affected settlement. The cut-off date provisions will apply to both the owners and shareholders of the lands and assets, as well as to their formal and informal users.
- **The SPV, in consultation with the KGM, has decided to broadly communicate the cut-off date in each affected settlement**, to ensure that all affected persons, and any person seeking to settle in the area, are informed. Accordingly, following completion of inventory of assets by the appointed engineering firm and KGM’s approval of the expropriation plans, the SPV will start posting the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions – following approval by KGM. These will be 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.

  This notice will include the following information:

  - Date of the declaration of Public Interest Decision for the Antalya – Alanya Motorway Project
  - Date of the formal expropriation decision for the relevant sections of the Project
  - Where relevant, the completion date of asset inventory surveys (including identification of land, structures, crops, and trees) in the affected area
  - The date on which the list of affected land parcels was publicly disclosed (e.g., posted at the offices of the local mukhtar in relevant neighbourhoods and/or villages), along with the duration of the disclosure period
  - Confirmation that this public disclosure date constitutes the cut-off date for eligibility for compensation and resettlement assistance under the Project
  - Clarification that any structures constructed, crops planted, or improvements made to assets after the cut-off date will not be eligible for compensation, as such additions will not be included in the valuation process. This includes new structures, trees, crops, or other immovable assets established after the cut-off date, as well as improvements to existing assets (In line with the principles set out in Article 25 of the Expropriation Law)
  - A note that affected persons will receive individual written notifications, and that land acquisition processes will be carried out in full compliance with applicable national legislation

- The SPV acknowledges that the cutoff date disclosed to the communities will not prevent the registration of individuals or groups who have legitimate claims to land, assets, or the use of natural resources in the Project footprint – including those who might be absent when the cutoff date is declared, such as absentee families or family members who may be engaged in seasonal or migrant labour elsewhere, inside or outside Antalya, etc.
- As part of its ongoing engagement with affected communities, the SPV informs affected persons that they will be separately notified regarding the Project and the expropriation schedule. They are also advised that they may continue their livelihood activities until compensation measures have been agreed upon and they have received formal notice to cease Project-affected activities. As of May 2025, no restrictions have been imposed on the ongoing livelihood activities of the affected affected.
- The SPV has captured **photogrammetric imagery** of the route to establish the baseline conditions.
- These baseline and updated images serve as a tool to verify and investigate claims related to assets constructed or planted after the cut-off date.
- The cut-off date for compensation eligibility of affected businesses and their employees will be formally declared during or in parallel to the consent negotiations to be held under Article 8 of the Expropriation Law.
    - For owners of the affected business structures – during negotiations
    - For tenant business owners and both formal and informal employees – in parallel to negotiations

  All formal and informal employees present at the time of the cut-off date declaration will be considered eligible for compensation.

7.3. Entitlement Matrix

Entitlements for the owners and/or users of affected land, houses, greenhouses, and businesses, including those identified as vulnerable persons, are presented in Table 7-5.

These entitlements have been determined based on the outcomes of the Valuation Review Study and the findings of the surveys conducted as part of the RAP studies.

For all relevant entitlements included in the Entitlement Matrix, the following provisions apply. These provisions are not repeated within the Matrix to avoid redundancy; therefore, the Entitlement Matrix should be read in conjunction with the provisions outlined below.

- To inform the affected people about the entitlements under RAP and the delivery conditions, a **Guide to Land Acquisition and Compensation (GLAC)** will be distributed to PAPs, upon approval of this RAP by the Lenders. The GLAC will clearly inform PAPs of the entitlements applicable to each eligible PAP category.
- For **affected lands**, the GLAC will clearly inform the PAPs about the costs (such as small costs, transaction costs, etc.) eligible for reimbursement, provided that evidence of expenditure or relevant documentation is submitted. The SPV will reimburse transaction costs after they incur based on the evidence of expenditures that will be requested from PAPs prior to payment. PAPs will be requested to contact the SPV using the details provided in the GLAC to submit the necessary documentation and their bank account information for payment processing. The SPV will reimburse the verified costs within **15 calendar days** following receipt of the required documents from each PAP.
- For **affected houses and greenhouses**, the GLAC will inform eligible persons that evidence of expenditure – such as relevant documentation of agreements with moving or logistics firms and related costs – must be properly retained. The SPV will closely follow the planning and execution of the moving process with the eligible persons, providing guidance and coordination regarding expenditures and their proper documentation. Prior to relocation, the SPV will assist eligible persons in submitting the necessary documentation for the advance approval of reimbursable moving and travel costs.
- For **affected business owners (including tenants)**, the GLAC informs the business owners that evidence of expenditure/relevant documentation (e.g. hiring real estate agency, moving/logistics firms, expenditures, etc. related to relocation process are required to be properly kept. The SPV will follow-up the planning and execution of moving processes closely with the business owners (e.g. hiring real estate agency, moving/logistics firm for disassembly-assembly, etc.) and advise and coordinate expenditures and their proper documentation. If the moving costs are to be reimbursed after they incur, the SPV will approve the expenditure in advance and evidence of expenditures will be requested from business owners prior to payment.
- **All payments from the RAP Fund will be made by the SPV** directly to the bank account of the eligible persons/entities (or to an account designated by the eligible persons/entities in cases where they do not have an active bank account). Bank receipts will be retained by the SPV to document the transactions.

Table 7-5. Entitlements Matrix

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(i) Affected Lands				
Permanent loss of private parcels **–** agricultural parcels and constructible plots[82] (urban lands) (excluding litigious parcels)	Owners/ shareholders	**2,085 privately-owned parcels** within Motorway's expropriation corridor: - Agriculture ("*tarla*"): 1,828 - Constructible plots ("*arsa*"): 87 - Orchard ("*kapama*"): 86 - Others[83]: 84	Compensation: Cash compensation for affected land is provided by the KGM in accordance with the Expropriation Law. Replacement Land: The Expropriation Law allows for replacement land; however, this option is generally not preferred by KGM due to the high volume of parcel acquisitions, the limited availability of land, and the difficulty in prioritising requests. Valuation: Land valuation is typically conducted annually based on market prices. However, the KGM – Head of Immovables Department informed the SPV on 13 June 2025 that the valuation updates in the Project will be undertaken on a **quarterly** basis. Transaction costs (such as registration, taxes, time lost, cost of transport) may be considered in the valuation but not separately itemised. In the section of the Project route where the valuation has already been completed, the appraisal was carried out based on data from the 2024 production year. Accordingly, the average annual net income of the lands and the resulting expropriation compensation amounts were calculated using prices from that period. Since the production and marketing (cash inflows and outflows) of many agricultural products typically take place in the autumn season, the income and expenditure figures determined using 2024 data may still be valid throughout the first nine months of 2025. However, after this period (i.e., from September 2025 onward), changes in land income are expected due to developments in input and product prices. Thus, it will be necessary to update the valuations using data from the 2025 production year. Negotiations: During Article 8 negotiations, which are based on valuation reports, landowners have the right to either accept or reject the proposed compensation amounts. Agreement: If a consent agreement is reached through Article 8 between KGM and the landowner, the agreed compensation amount is paid by KGM within **45 days** following the execution of the agreement protocol. If owners/shareholders do not receive the mandatory cash compensation (expropriation cost) within the period specified in the Expropriation Law (i.e., within 45 days following the execution of the agreement protocol under Article 8), KGM is required to pay legal interest for the period between the due date and the actual payment date – **provided that the individual files a claim with the court.** No agreement/disagreement case: A court process is initiated under Article 10 to determine the land value through court-appointed experts. The final expropriation value is paid upon the conclusion of the court proceedings (see Section 2.8.4). Orphan land: The landowner has the right to request the purchase and compensation of any portion of land if the remaining section of the parcel (orphan land) is	1)Replacement Land Search Support: The SPV will assist in identifying replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed. 2) Top-up Cash Compensation to Achieve Full Replacement Value for Land: ○ **Article 8 agreement case**: If replacement land of similar quality, size, and location is identified by the PAP, the transaction costs applicable to the acquisition of replacement will be paid by the SPV after the transaction is completed. ○ **Article 27 court case**: The final expropriation value will be determined by the court. No top-up cash compensation will be provided by the SPV for the land. KGM will update the valuation rates for land and assets **quarterly**. In Q3 2025, the SPV will commission the valuation contractor (a national engineering firm) to collect, analyse, and update the 2025 income-expenditure data from landowners/users cultivating relevant crops along the project route, under the supervision of KGM. The SPV will then submit the collected data to KGM requesting valuation update by September 2025, as necessary. Please refer to the "**Loss of Non-residential Structures and Assets**" category of this matrix (**below**) for compensation of structures and assets on affected private and public lands at full replacement value and assistance measures. 3) Small costs in relation with Official Procedures for Land Acquisition: There may be various expenses and travel costs related to deed transfer in negotiated settlements that are not covered by KGM, as they are not stipulated under the Expropriation Law. These costs, which must be borne by landowners, will be covered by the SPV from the RAP Fund – within the budget allocated for the Small Costs Fund – provided that the expenses are properly documented. Costs to be covered – based on documented evidence of expenditure and related to negotiations and title deed transactions – are listed below: ○ Power of attorney costs (no limit) ○ Working capital fund ("*doner sermaye*") for title deed transactions related to new land purchases, costs will be paid per parcel – not per individual shareholder and associated costs related to inheritance and succession ○ Inner city transportation costs ○ Inter city transportation costs 4)Livelihood Restoration, Improvement and Assistance: If the owner/shareholder uses the affected land for agricultural production – regardless of whether they purchase new land – they will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8. 5)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The following soft support measures will be provided by the SPV to PAPs to ensure enhanced information and consultation regarding the expropriation and RAP processes. These measures are outlined in the GLAC, which will be distributed to each owner/shareholder and user. In addition, the measures will be communicated through face-to-face meetings to be held by KGM and participated by the SPV in all affected settlements prior to the Article 8 negotiations: ○ The SPV will organise consultation meetings to inform PAPs about the land acquisition process and their rights under this RAP, including a clear explanation of entitlements. ○ GLACs will be distributed individually to each shareholder and user. ○ In coordination with KGM, the SPV will ensure that all PAPs are informed about and actively engaged in negotiation meetings. This aims to increase the number of consent agreements and reduce reliance on Article 27 legal proceedings. ○ In cases where Article 8 agreements are reached, the SPV will monitor the payment process with KGM – through expropriation trackers that are updated at least weekly. If any owners/shareholders have not received the mandatory cash compensation from KGM within the timeframe specified in the Expropriation Law (i.e., within 45 days after execution of the agreement protocol), the SPV will inform them of their legal right to claim interest through the courts. ○ As needed, the SPV will support heirs in obtaining inheritance certificates from the nearest notary, including by providing transportation assistance, and will cover notary fees, travel expenses, and related small costs using the RAP Fund (as outlined in the **small costs section above**). The SPV will work with KGM to ensure that the inheritance certificates are included in the files submitted to the relevant courts. ○ The SPV will, to the extent possible, inform owners/shareholders once court cases are finalised and the expropriation payments (including Land Seizure Values as per Article 27), in accordance with the Expropriation Law, have been deposited and are accessible to them. ○ Land entry will only occur after expropriation is finalised – including completion of expropriation payments – or once mutual agreements/consent protocols for land entry have been concluded with the owners/shareholders. ○ Land entry protocols with owners/shareholders or users along the expropriation corridor will be completed prior to any entry onto the land.

[82] Urban land that has been parcelled by municipalities within municipal boundaries is classified as a constructible plot (referred to as *arsa* in Turkish), in accordance with Article 12 of Türkiye's Real Estate Tax Law (Law No. 1319). For lands – whether within or outside municipal boundaries –that have **not** been parcelled, the designation as a constructible plot (*arsa* or urban land) is made through a Presidential Decree or other relevant legal instruments, as applicable.

[83] Parcels registered as structure, road parcels, raw soil parcels, park, etc.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			deemed economically unviable and meets KGM's criteria for unviable land acquisition. If the land does not meet these criteria, the landowner still retains the right to pursue a court case (see the entitlements for "Orphan Lands" in the separate row below)	
	Formal Users (Tenants) – with formal tenancy agreements	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project.	**No compensation for land** is provided to land users under the Expropriation Law. However, **formal tenants** are eligible for compensation for crops, trees, and any assets or fixed improvements/investments (such as structures) on the rented land, provided they can demonstrate ownership of these crops and assets. **Depreciation** will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	1)Replacement Land Search Support: The SPV will assist in identifying replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed. 2)Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide **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 (separate rates will apply for open field farming and greenhouses). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year. 3)Compensation of rental fees paid in advance by long-term tenants or fees stemming from special formal tenancy agreement conditions: ○ **For long-term tenants** (whether for greenhouses or open fields) who have paid rent in advance, if the landowner does not refund the unused portion of the rental payment, the outstanding amount will be compensated 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). ○ Where applicable, special **case-by-case provisions based on the specifics of tenancy agreements** will be reviewed and evaluated by a third-party valuation expert to be commissioned by the SPV, in consultation with the District Directorates of Agriculture, as needed. If necessary, compensation will be provided to ensure that tenants are not disadvantaged in cases where they are fined under their lease agreements due to early termination. All costs related to such reviews and assessments will be covered by the SPV, provided that appropriate evidence is submitted. 4)Livelihood Restoration, Improvement and Assistance: The land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8. 5)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded. 6)Cash Compensation for Crops of **Formal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) are made to the **owners of the crops and trees prior to land entry**. These payments will be documented through land entry protocols and bank transactions. 7)Top-up Cash Compensation for Fixed Improvements/Investments and Assets of **Formal** Land User (to achieve Full Replacement Value): If there are assets (**major** (*) fixed improvements or investments) made or owned by the formal user on the affected land during the tenancy, top-up compensation will be provided by the SPV from the RAP Fund to the formal user (based on evidence of structure ownership) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. 8)Monitoring, Grievance Management and Corrective Measures: During the construction and operation phases, potential losses/issues due to land fragmentation (e.g. losses/issues related to water connection, ditches, use of agricultural machinery, ploughing equipment, etc.), operation phase impacts, etc. will be identified/monitored based on engagement with land users and through the Project grievance mechanism. As required, corrective measures/actions will be planned and implemented by the SPV on a case-by-case basis. 9)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions.
	Informal Users – with **no** formal tenancy agreements or official documentation	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project.	**No compensation for land** is provided to land users under the Expropriation Law. However, **informal** users 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. **Depreciation** will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	1)Replacement Land Search Support: The SPV will assist in identifying replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed **(same entitlement with formal user)**. 2) Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide **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 (separate rates will apply for open field farming and greenhouses). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year **(same entitlement with formal user)**. 3) Livelihood Restoration, Improvement and Assistance: The land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 **(same entitlement with formal user)**. 4)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded **(same entitlement with formal user)**.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				5)Cash Compensation for Crops of **Informal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops are made to the owners of the crops (who are **informal** users of land) **prior to land entry**. These payments will be documented through land entry protocols and bank transactions **(same entitlement with formal user)**. 6)Cash Compensation for Trees and Assets Owned by **Informal** Land Users (to Achieve Full Replacement Value): If there are assets (**major**(*) fixed improvements or investments) made or owned by the **informal** user on the affected land, top-up compensation will be provided by the SPV from the RAP Fund to the formal 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 – in addition to the compensation paid by KGM (based on evidence of ownership). The amount will be determined on a case-by-case basis by a third-party valuation expert to be commissioned by the SPV. For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. **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. 7)Monitoring, Grievance Management and Corrective Measures: During the construction and operation phases, potential losses or issues – such as those arising from land fragmentation (e.g. disruptions to water access, irrigation ditches, use of agricultural machinery, ploughing equipment), or impacts during the operational phase – will be identified and monitored through ongoing engagement with land users and via the Project's grievance mechanism. Where necessary, the SPV will plan and implement corrective measures on a case-by-case basis **(same entitlement with formal user)**. 8)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions **(same entitlement with formal user)**.
Litigous properties ("*ihtilaflı bulunan mülkiyet*")	Litigant owners/ shareholders of litigious properties	Litigious parcels containing no structure: - Yukarıkocayatak (154/1113) - Hocalar (212/30) - Aşağışıklar (122/124, 122/122) - Taşağıl (910/4, 913/3, 515/311) - Evren (761/19), - Alara (D1, D2, D3, D4, D5, D6, D7, D8), - Emişbeleni (122/47, 205/1), - Hacıisali (196/3, 196/4, 196/5)	When there is a court dispute regarding the ownership of a parcel (i.e. 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. In cases where the expropriation follows the procedure outlined in Article 27 (accelerated expropriation), the final expropriation compensation becomes accessible to the owners/shareholders – whose eligibility has been confirmed by the court under Article 18 – only after the completion of the Article 10 process, which follows the Article 27 process. If the court rules in favour of the state/treasury, litigious owners/shareholders become illegal occupants.	1)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform the litigious owners/shareholders about the land acquisition process, as well as their rights and entitlements under this RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions. Litigious owners/shareholders of parcels that contain houses, greenhouses, or business structures will be consulted individually to identify any specific vulnerabilities. Tailored measures will then be designed and implemented by the SPV on a case-by-case basis. The SPV will monitor the court proceedings to mitigate any potentially exacerbated impacts arising from lengthy legal procedures. **(*)** All entitlements defined under "**Permanent loss of private parcels**" will apply to litigious private owners/shareholders whose eligibility for compensation under the Expropriation Law has been validated by the courts through the Article 18 process. These entitlements will be delivered by the SPV to the validated owners/shareholders upon completion of the Article 10 process.
	Formal and informal users of litigious parcels	Litigous parcels containing greenhouses: - Aksaz (117/17, 117/18), - Telatiye (439/1, 439/2, 439/5)		**(*)** All entitlements outlined for formal and informal users under the category of "Permanent loss of private parcels" also apply to agricultural users of litigious parcels **(please see above).**
Orphan lands	Owners/ shareholders	Please refer to Section 3.2.1.2 for orphan lands. Please refer to Section 2.9 for Zoning Plan Implementation.	Minimisation of orphan lands: The expropriation boundary for the Project has been established by KGM with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel. Right to apply for acquisition of orphan lands: 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.	**A)Parcels within 1/1,000 scale Implementation Zoning Plan – readjustment share (DOP) already deducted ("*uygulama gormus*"):** Zoning plan implementation of the related authority will be awaited and monitored by the SPV, in coordination with KGM, for these parcels. The SPV will commission a third-party valuation expert to review each case individually and determine the actions required to be taken by SPV, if any (e.g. provision of compensation for the unacquired part in case the unacquired part is economically unsuable or undevelopable). **B)Parcels within 1/1,000 scale Implementation Zoning Plan – no readjustment share (DOP) deducted previously ("*uygulama gormemis*")** Zoning plan implementation of the related authority will be awaited and monitored by the SPV, in coordination with KGM, for these parcels. The settlements affected by the Motorway's land acquisition and that fall within 1/1,000-scale zoning plan implementation areas are discussed in Section 2.9. According to Article 13 of the BOT Contract, necessary upper and lower scale zoning plan and zoning plan amendments will be made by the SPV according to the approved Project. Consequently, orphaned portions of agricultural or constructible (urban) plots – i.e., the remaining parts of expropriated parcels – located within the 1/1,000 zoning plan implementation area will be addressed through the zoning plan implementation, which will be carried out by the respective municipalities. The SPV, in coordination with the EPC Contractor, undertakes the necessary actions in this regard pursuant to the provisions of the BOT Contract. The SPV will work in coordination with the respective municipalities that will carry out the zoning plan implementation. ○ **Agreement cases (as per Article 8):** The owner/shareholder of the affected parcel has the right to officially apply to KGM and request acquisition of the remaining part of the expropriated parcel. The SPV will inform the PAPs about their legal rights as described in this RAP (through distribution of KGM's booklet on procedural steps of expropriation and GLAC and during PAP meetings to be held prior to Article 8 negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			KGM reviews official applications submitted by PAPs requesting the expropriation of orphan lands, provided that the remaining areas are in line with KGM's criteria for unviable land acquisition criteria. Each application may not necessarily be approved by KGM; however, the owner or shareholder retains the right to seek legal remedy through the courts. Approach for greenhouses: In this Project, for parcels containing **greenhouses**, the parcel is expropriated fully if the remaining area is **less than 400 m², ** as confirmed by the experts from the KGM's Regional Directorate – Department of Immovables. Approach for greenhouses: For open fields, no fixed threshold has been established; each case is individually evaluated by KGM based on the PAP's application. Zoning Plan Implementation: According to Article 13 of the BOT Contract, the SPV shall notify the KGM of the zoning plan amendment requests required due to expropriation, project and project changes required to 219ndivi the construction and operation obligations. For all expropriation transactions to be carried out including Zoning Plan Amendment and New Zoning Plan, preparation, engineering services and other relevant works under the scope of the Administration shall be carried out by the SPV. Necessary upper and lower scale zoning plan and zoning plan amendments will be made by the SPV according to the approved Project. In case there are changes in the Project at the end of the Construction Period, upper and lower scale zoning plan amendments and new zoning plans will also be made by the SPV. Necessary applications for zoning plan amendments arising from Project and Project changes and requested by the SPV will be made by the KGM. The SPV, in coordination with the EPC Contractor, undertakes the necessary actions in this regard pursuant to the provisions of the BOT Contract. The SPV will work in coordination with the respective municipalities that will carry out the zoning plan implementation.	In case the acquisition request of the owner/shareholders is not concluded positive by KGM, the SPV will commission a third-party valuation expert to review the case and determine the actions required to be taken by SPV, if any. ○ **Court (disagreement) cases:** The owner/shareholder of the affected parcel has the right to apply to courts. The final decision for acquisition of the remaining part of the expropriated parcel will be executed by the courts. The SPV will inform the PAPs about their legal rights as described in this RAP (through distribution of KGM's booklet on procedural steps of expropriation and GLAC and during PAP meetings to be held prior to Article 8 negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required. **C) Parcels outside 1/1,000 scale Implementation Zoning Plan (may be under preparation)** ○ **Agreement cases (consent as per Art. 8):** The owner/shareholder of the affected parcel has the right to officially apply to KGM and request acquisition of the remaining part of the expropriated parcel. The SPV will inform the PAPs about their legal rights as described in this RAP (through distribution of KGM's booklet on procedural steps of expropriation and GLAC and during PAP meetings to be held prior to Article 8 negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required. In case the acquisition request of the owner/shareholders is not concluded positive by KGM, the SPV will commission a third-party valuation expert to review the case and determine the actions required to be taken by SPV, if any. ○ **Court (disagreement) cases:** The owner/shareholder of the affected parcel has the right to apply to courts. The final decision for acquisition of the remaining part of the expropriated parcel will be executed by the courts. The SPV will inform the PAPs about their legal rights as described in this RAP (through distribution of GLAC and during PAP meetings to be held prior to Article 8 consent negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required. All other entitlements defined for the **owners/shareholders** "**Permanent loss of private parcels**" are applicable to the owner/shareholders of the orphan lands. In cases where a zoning parcel has already undergone road relinquishment and there are claims or grievances raised by relevant PAPs, the SPV will commission a third-party valuation expert to ensure a fair assessment of value reduction in the remaining part and advise the KGM accordingly.
	Formal Users (Tenants) – with formal tenancy agreements	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project.	**No compensation for land** is provided to land users under the Expropriation Law. However, **formal tenants** are eligible for compensation for crops, trees, and any assets or fixed improvements/investments (such as structures) on the rented land, provided they can demonstrate ownership of these crops and assets. Depreciation will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	All entitlements outlined for **formal users** under the category of "**Permanent loss of private parcels**" apply **(please see above)**.
	Informal Users – with no formal tenancy agreements or official documentation	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project.	**No compensation for land** is provided to land users under the Expropriation Law. 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 .	All entitlements outlined for **informal users** under the category of "**Permanent loss of private parcels**" apply **(please see above)**. For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
Permanent loss of state-owned parcels (treasury, non-registered) – which are used for agriculture	Owners	Governmental institutions	Treasury lands and unregistered parcels are allocated to the Project upon KGM's application, without any payment.	-
	Formal Users – with official documentation	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project. The formality of their use of state-owned parcels must be verified through official documentation, such as proof of adequate pay/occupation fee ("*ecrimisil*") as applicable.	**No compensation for land** is provided to land users under the Expropriation Law. However, **formal users of state-owned lands** (e.g. treasury parcels) are eligible for compensation for crops, trees, and any assets or fixed improvements/ investments (such as structures), provided they can demonstrate ownership of these crops and assets. **Depreciation** will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	1)Replacement Land Search Support: The SPV will assist in identifying replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed. 2)Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year** rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land (separate rates will apply for open field farming and greenhouses). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year. 3)Livelihood Restoration, Improvement and Assistance: The land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8. 4)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded. 5)Cash Compensation for Crops: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) are made to the owners of the crops and trees **prior to land entry**. These payments will be documented through land entry protocols and bank transactions. 6)Top-up Cash Compensation for Fixed Improvements/Investments and Assets of **Formal** Land User (to achieve Full Replacement Value): If there are assets (**major**(*) fixed improvements or investments) made or owned by the formal user on the affected **state-owned land**, top-up compensation will be provided by the SPV from the RAP Fund in addition to the compensation paid by KGM (based on evidence of ownership) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. 7)Monitoring, Grievance Management and Corrective Measures: During the construction and operation phases, potential losses/issues due to land fragmentation (e.g. losses/issues related to water connection, ditches, use of agricultural machinery, ploughing equipment, etc.), operation phase impacts, etc. will be identified/monitored based on engagement with land users and through the Project grievance mechanism. As required, corrective measures/actions will be planned and implemented by the SPV on a case-by-case basis. 8)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions.
	Informal Users – with no official documentation	Individuals within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on individuals are kept in the PAP Database of the Project.	**No compensation for land** is provided to land users under the Expropriation Law. 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 ("*işgalci*")**, are not entitled to any form of legal compensation for either the land or the assets. **For informal users of forest lands,** KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed	1)Replacement Land Search Support: The SPV will assist in identifying replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed **(same entitlement with formal user)**. 2)Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land (separate rates will apply for open field farming and greenhouses). The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year **(same entitlement with formal user)**. 3)Livelihood Restoration, Improvement and Assistance: The land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 **(same entitlement with formal user).** 4)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded **(same entitlement with formal user)**. 5)Cash Compensation for Crops of **Informal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops are made to the owners of the crops (who are **informal** users of land) **prior to land entry**. These payments will be documented through land entry protocols and bank transactions **(same entitlement with formal user)**. 6)Cash Compensation for Trees and Assets Owned by **Informal** Land Users (to Achieve Full Replacement Value): If there are assets (**major**(*) fixed improvements or investments) 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 formal 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 – in addition to the compensation paid by KGM (based on evidence of ownership). The amount will be determined on a case-by-case basis by a third-party valuation expert to be commissioned by the SPV.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. **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. 7)Monitoring, Grievance Management and Corrective Measures: During the construction and operation phases, potential losses/issues due to land fragmentation (e.g. losses/issues related to water connection, ditches, use of agricultural machinery, ploughing equipment, etc.), operation phase impacts, etc. will be identified/monitored based on engagement with land users and through the Project grievance mechanism. As required, corrective measures/actions will be planned and implemented by the SPV on a case-by-case basis **(same entitlement with formal user)**. 8)Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLACs will be distributed individually to each user to ensure clarity and transparency regarding these provisions **(same entitlement with formal user)**.
Permanent loss of pasture lands	Users of registered pasture parcels within **expropriation corridor**: Uzunlar, Manavgat (3 parcels): - 101/34 - 101/35 - 101/36 There is a single registered winter pasture overlapping with the **quarry site** (“*kışlak*”) in Saburlar, Alanya (103/23).	The RAP field surveys confirmed that the registered pasture parcels within the expropriation corridor are not actively used for grazing purposes. According to RAP surveys, in winter, animals are mainly kept in barns and fed stored fodder, or grazed on agricultural fields. Some also utilize open, treeless forest lands and fallow areas for grazing, especially where pasture land is lacking. Reliance on forested or previously deforested (open and unused parts) areas as substitute grazing lands is also common though strictly prohibited by law. The actual use of the registered winter pasture at the quarry site in Saburlar, Alanya for grazing purposes will be confirmed once the site is approved for use following the completion of the permitting process. A preliminary review of the satellite image of the site suggests that these parcels may not be actively used for grazing purposes.	Payments for pasture lands as required by Pasture Law are made by KGM to the Treasury. No compensation is provided to the communities for the loss of grazing lands unless the pastures are registered in the name of the village legal entity, in accordance with the Turkish Expropriation Law.	1)Replacement Land Search Support: No impacts are anticipated under the current Project design. However, in the event that such an impact is identified during RAP implementation, the SPV will assist in identifying alternative grazing land of comparable quality, size, and location, in coordination with the relevant authorities. 2)Livelihood Restoration, Improvement and Assistance: No impacts are anticipated under the current Project design. However, in the event that such an impact is identified during RAP implementation, the land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on grazing activities. 3)Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.
Restriction of access to grazing lands located out of Project expropriation corridor (public or private) due to fragmentation	Users of grazing lands	Please see above (“permanent loss of pasture lands”). Among 34 mukhtars, mukhtar of Hacıobası, Manavgat indicated loss of grazing lands during RAP field surveys. This will be verified during RAP implementation along with the information of crossing structures. The SPV will monitor and address any potential impacts that may arise during the implementation phase of the RAP.	No compensation is provided to the communities for restriction of access.	1)Livelihood Restoration, Improvement and Assistance: No access restriction impacts are anticipated under the current Project design. However, in the event that such an impact is identified during RAP implementation, the land user will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on grazing activities. 2) Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.
Loss of forest parcels (treasury and non-registered forest, and private forestation) used for economic activities – for the compensation of **houses, greenhouses, and trees on forest**	Forest parcels within the expropriation corridor are listed in Table 3-9. There are also **two** private forestation parcels within the expropriation corridor.	According to the RAP field surveys (mukhtar and household livelihood questionnaires), mukhtars or PAPs do not anticipate any impact on their use of affected forest parcels due to Motorway construction or operation. The actual use of the forest parcels at temporary quarry sites will be confirmed once the sites are approved for use and prior to land entry.	Forest permit is obtained by KGM in accordance with the provisions of the Forest Law (Please refer to **Table 2-22 for the permitting status of forest parcels** overlapping with the expropriation corridor) (Please refer to **Section 2.3.9 for the permitting status of temporary facility sites** overlapping with forest parcels)	For the compensation of **houses, greenhouses, and trees on forest lands**, please refer to relevant rows **(Affected Trees, Affected Houses, and Affected Greenhouses)** in this Entitlements Matrix. The following applies to the **users of forest** for other formal or informal economic activities (such as grazing, collecting products), if any: 1)Livelihood Restoration, Improvement and Assistance: No access restriction impacts are anticipated under the current Project design. However, in the event that such an impact is identified during RAP implementation, the users of forest for economic activities will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on forest lands. 2)Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
lands, please refer to relevant rows **(Affected Trees, Affected Houses, and Affected Greenhouses)** in this Entitlements Matrix.				3)Reimbursement of Private Forestation Investment Fees: Private individuals who have paid forestation investment fees to the forestry authorities for their own forestation initiatives will be compensated through reimbursement of the amounts paid by the SPV from the Expropriation Budget (not included in the RAP Fund).
Loss of crops	Owners of the crops – owner or formal/informal user of the land		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. However, in such cases, compensation is to be paid to the shareholders in proportion to their title deed shares, rather than to the actual cultivators of the crops.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded **(same entitlement with formal user)**. 2)Cash Compensation for Crops of **Formal** or **Informal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) are made to the **owners** of the crops and trees **prior to land entry**. These payments will be documented through land entry protocols and bank transactions. For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. If there are **crops** owned by **informal** users **forestry or pasture lands**, which are not subject to compensation by KGM, the crop 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. 3)Livelihood Restoration, Improvement and Assistance: The land users will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
Loss of trees (fruit or non-fruit trees, **including commercial orchards "***kapama bahçe***"**)	Owners of the trees (owner or formal/informal user of the land)	Please see below the trees and saplings on **commercial orchards.** A variety of fruit trees are planed around residences or elsewhere. These are typically intended for household consumption rather than commercial purposes and included for each parcel in the expropriation plans.	Valuation: In accordance with the Expropriation Law, cash compensation is provided by KGM to the owner of the trees. The valuation of agricultural trees is carried out in line with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": "*The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports*". For trees in the preparation and maintenance period (i.e. before entering the productive stage), compensation is determined using the capitalisation method. This includes costs associated with labour, machinery, and materials for cultivation, planting, irrigation, fertilization, pesticide application, and other relevant agricultural inputs, along with the rental value of the land. Trees owned by informal land users: 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 is paid to the possessor of the trees. This does not apply to trees on forest or pasture parcels. Demolition debris value: The experts from KGM's 13th Regional Directorate and technical staff of the valuation contractor responsible for entering data into the system during the expropriation process confirmed that **no debris value is deducted** from the expropriation compensation for trees or structures. This will be further verified by the SPV once the valuation reports for the Project become available.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation is finalised (including the completion of compensation payments) or mutual agreements/consent protocols and land entry protocols with landowners and/or users have been concluded **(same entitlement with formal user)**. 2)Cash Compensation for Crops (Fruits) of **Formal** or **Informal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for products (e.g., fruits) are made to the **owners** of the crops and trees **prior to land entry**. These payments will be documented through land entry protocols and bank transactions. For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. If there are **fruit trees** owned by **informal** users **forestry or pasture lands**, which are not subject to compensation by KGM, the product 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. 3)Livelihood Restoration, Improvement and Assistance: In addition to the cash compensation provided by KGM in accordance with the Expropriation Law, owners of trees may request the relocation and transplantation of their trees. In such cases, the trees are transplanted to a suitable location identified by the owner by a landscaping consulting company engaged by the SPV. If relocation is not requested, the tree debris will be left to the owner upon their request. In addition, the land users will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	Owners of the **commercial orchards** (“*kapama bahce*”) - Olive - Orange - Lemon - Avocado - Apricot - Pomegranate - Dragon fruit	Open-field orchards (213 parcels): - Vinyards (grapes): 25,685 trees on 4 parcels - Olive: 10,300 trees on 98 parcels - Citrus: 8,647 trees on 83 parcels - Pomegranate: 2,263 trees on 18 parcels - Avocado: 1,944 trees on 14 parcels - Apricot: 1,226 trees on 3 parcels Open-field orchards on treasury lands (70/213 parcels): • Serik (41 parcels): ○ Sarıabali (41) • Manavgat (29 parcels): ○ Kalemler (8) ○ Aşağıışıklar (6) ○ Yavrudoğan (3) ○ Hocalar (2) ○ Gündoğdu (2) ○ Evren (2) ○ Çolaklı (1) ○ Karaöz (1) ○ Dikmen (1) ○ Bucakşeyhler (1) ○ Aksaz (1) ○ Hacıisalı (1) Non-registered lands (1/213 parcels): • Alanya (1 parcel) ○ Sarıabali (1) Orchards under cover (in greenhouses): - **Banana**: 18,672 saplings on 27 parcels - **Dragon fruit**: 6,785 saplings on 3 parcels **On treasury lands:** • Toslak, Alanya: 2 parcels (banana)	The KGM 13th Regional Directorate does not consider orchard-based (“*kapama bahce*”) valuation calculations, and instead, bases its reports on the unit values for trees declared by the Provincial and District Directorates of Agriculture and Forestry, while separately calculating the base (field) value of the land. While this approach is not inherently unreasonable, it limits the transparency and scientific accuracy of the valuation process. The declared tree values are determined without applying the income approach and are often based on assumptions. These assigned unit values for trees may occasionally align with those derived using scientific methods (i.e., applying the net income approach to orchard production data), but they may also be significantly higher or lower. The Regional Directorate justifies their preference for this approach by explaining that local farmers are more concerned with how many individual trees will be lost from their parcels due to expropriation, rather than the concept of consolidated orchard valuation. The Agriculture and Forestry Directorates across Türkiye tend to assign higher tree values as tree age increases, which is not consistent with the logic of the income approach. According to this method, the unit value of a tree is highest at the start of its productive phase and should decline with age as productivity diminishes. The valuation contractor applies orchard-based valuation methods. However, the Regional Directorate does not incorporate those figures into their official valuation. Informal users of forest and pasture lands are considered as **illegal occupants (“*işgalci*”)**, are not entitled to any form of legal compensation for lost trees. However, for informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed	All entitlements outlined above for loss of trees apply **(please see above)**. 1) Top-up Compensation to Compensate Dense Planting Deduction applied by KGM: The gap between KGM’s compensation and the rightful compensation has been included in the RAP Fund and will be provided to the owner of the trees by the SPV as a top-up compensation. 2) Comparative Analysis of Orchard Valuation Methodologies: The SPV will commission the valuation contractor to carry out calculations based on the income approach should also be conducted for other fruits identified during the assessments (e.g., grape, avocado, apricot, pomegranate, banana, dragon fruit, etc.), and verify that the Directorate’s figures do not fall below those calculated using scientific valuation methodologies (orchard valuation method) by making a comparative analysis. The third-party valuation expert to be retained by the SPV will conduct a third-party review of the comparison and results, and advise the SPV accordingly. In the event of grievances, claims, or requests related to orchard valuation during Article 8 negotiations, the SPV will engage a third-party valuation expert to conduct a **comparative analysis** between the Regional Directorate’s valuation and orchard-based valuation calculations, on a case-by-case basis. If the analysis confirms that the figures used by the Directorate are lower than those derived through the scientifically grounded orchard valuation method, the SPV will request KGM to base the compensation on the orchard valuation method. If KGM does not adopt the orchard valuation method, the SPV will provide **top-up compensation** to cover the difference. In the event of a court process, the valuation of orchards will be conducted by the court. 2) Transitional rental allowance for formal replacement land to be rented (for 1-year) **for the owners of orchards on treasury, forest or pasture lands**: If the orchard owner finds replacement orchard land for formal lease, the SPV will provide one-off transitional support equivalent to the 1-year rental fee for replacement land (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) (separate rates will apply for open field farming and greenhouses). The rental allowance will be calculated by a third-party valuation expert based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year **(same entitlement with formal user)**. For the delivery of entitlements, the SPV will identify the rightful owners (actual owners of the trees) in both public (treasury) and jointly owned parcels containing commercial open-field or greenhouse orchards.
Loss of non-residential structures and infrastructure on affected **private lands** (non-residential/ secondary structures, fences, barns, sheds)	**Owners of non-residential structures and infrastructure** who are either landowners or formal tenants/users with official documentation	Please see Section 3.2.2.3 for non-residential structures. Non-residential structures are identified for each affected parcel and included in the expropriation plans.	In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with KGM’s Technical Specifications for the Services to be Procured for the Valuation of Immovables, issued in February 2019. **Depreciation** is applied according to the depreciation ratios stipulated in the applicable Turkish legislation. In cases of **joint landownership**, compensation is paid to the **owner** of the structure, 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.	1)Top-up Cash Compensation to achieve Full Replacement Value of the Structures: Top-up cash compensation will be provided by the SPV from the RAP Fund to the **structure owner** in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. - **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days**[85] following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owners/shareholders by KGM. OR for cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the 45-day payment period will begin from the date of the Finance Agreement signing. PAPs with eligible compensation will be informed at the start of the public disclosure process. - **Court cases as per Law:** The payment will be made within **45 calendar days** following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP.

[85] This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			Incomplete construction ("*eksik imalat*"): The **unit construction costs** published by the Ministry of Environment, Urbanisation and Climate Change are calculated under the assumption that the buildings possess the standard characteristics they are supposed to have under normal conditions. However, if the expropriated building has features that fall short of these standards, the costs corresponding to the deficiencies is calculated and deducted from the total value of the structure. This situation is frequently encountered, especially with **older buildings**. For example, if a building subject to valuation lacks plaster as a construction component, the cost of the plaster must be calculated and subtracted from the total value of the building. Supreme Court rulings also emphasize that the **internal and external features** of the disputed structure (e.g., water, electricity, and sewer systems, wet and dry floor coverings, roof materials, etc.) must be examined in detail, and the **structure's value should be determined after deducting the cost of any missing components**[84] (Anonymous, 2015; Anonymous, 2016; Anonymous, 2018). Just as the cost of additional features such as a jacuzzi, sauna, built-in cupboards, wood paneling, parquet flooring, ceramic tiles, and central heating system, if present in an individual unit but not in others, should be added to the total cost, similarly, deducting the cost of missing elements is a reasonable practice and is not considered inconsistent with compliance with international standards.	3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
	Owners of non-residential structures and infrastructure **who are informal users of private lands** (with no title deed **but can prove their ownership of the structure)**		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.	1)Top-up Cash Compensation to achieve Full Replacement Value of the Structures: If there are assets (**major**(*) fixed improvements or investments) made or owned by the **informal** user on the affected land, top-up compensation will be provided by the SPV from the RAP Fund to the formal 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 – in addition to the compensation paid by KGM (based on evidence of ownership). The amount will be determined on a case-by-case basis by a third-party valuation expert to be commissioned by the SPV. 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
	Owners of non-residential structures and infrastructure **who are informal users of private lands** **(with no official documentation** proving their ownership of the structure)	Please see Section 3.2.2.3 for non-residential structures. No specific cases have been identified in the expropriation plans or during RAP field surveys. The SPV will monitor and address any potential impacts that may arise during the implementation phase of the RAP.	**No compensation** is provided under the Expropriation Law.	1)Cash Compensation at Full Replacement Value: If the assets owner (informal land users) cannot prove her/his ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owners of the assets by the SPV from the RAP Fund. 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.

[84] Anonymous, 2015. Supreme Court Decision. 5th Civil Chamber, No: 2014/23596, Decision: 2015/5990, Date: 25.03.2015; Anonymous, 2016. Supreme Court Decision. 5th Civil Chamber, No: 2016/12246, Decision: 2016/17970, Date: 22.12.2016; Anonymous, 2018. Supreme Court Decision. 5th Civil Chamber, No: 2018/6157, Decision: 2018/19026, Date: 25.10.2018.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
Loss of non-residential structures and infrastructure on affected **public lands** (non-residential/ secondary structures, fences, barns, sheds) – for the compensation of **houses, greenhouses, and trees on forest lands**, please refer to relevant rows **(Affected Trees, Affected Houses, and Affected Greenhouses)** in this Entitlements Matrix.	**Owners of non-residential structures and infrastructure** who are **formal** tenants/users with official documentation	Please see Section 3.2.2.3 for non-residential structures. Non-residential structures are identified for each affected parcel and included in the expropriation plans.	In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019. Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.	1)Top-up Cash Compensation to achieve Full Replacement Value of the Structures: Top-up cash compensation will be provided by the SPV from the RAP Fund to the private **owner** of the structure, in order to cover the **depreciation** deducted from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
	Owners of non-residential structures and infrastructure **who are informal users of state 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 is paid to the possessor.	1)Top-up Cash Compensation to achieve Full Replacement Value: In case there are assets (**major**(*) fixed improvement/investments) made/owned by the informal user on affected land, KGM pays for **minimum material cost as per Article 19** of the Expropriation Law, thus top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings). 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP 3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
	Owners of non-residential structures and infrastructure on **forestry and pasture** lands or owners **with no official documentation proving their ownership of the structure**		**No compensation** is provided under the Expropriation Law.	1)Cash Compensation at Full Replacement Value: For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. If the assets owned by informal users are on **forestry and pasture lands,** which are not subject to compensation by KGM, or if the assets owner (informal land users) cannot prove her/his ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owners of the assets by the SPV from the RAP Fund. 2) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP 3) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
Establishment of servitude (easement) resulting in a reduction in the value of the immovable asset	Owners of parcels subject to acquisition through the constitution of servitude (easement rights)	Easement rights will apply to any privately owned parcels that are affected by the OHTL or other infrastructure displacement-related works. In such cases, expropriation will be carried out, and easement rights (servitude – *irtifak*) for the (i.e. underwire alignment for the OHTLs) alignments will be established by KGM in accordance with the Expropriation Law and the approved expropriation plans. No easement rights are anticipated to be established for other Project components or associated facilities.	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 – reflecting the value of any potential restrictions on land use – is determined by KGM's asset valuers and paid to the owners/shareholders for the alignments (i.e. underwire alignment for the OHTLs). As stipulated by the Law, ownership rights remain with the landowner, subject to the implementation of necessary safety measures.	1)Monitoring, Grievance Management and Corrective Measures: Where applicable, the constitution of servitude for any Project-related displacement works (e.g. infrastructure) will be monitored by the SPV during both the construction and operation phases, in collaboration with KGM, and in accordance with the procedures outlined in the Expropriation Law. The SPV will also consult affected owners or users (if any) to identify potential grievances and/or risks (e.g. loss of property value). As required, any grievances related to compensation for loss of land value under the Expropriation Law, and during the construction and operation phases, will be assessed by the SPV, with support from third-party valuation experts as necessary. Based on these assessments, corrective measures (e.g. compensation for damages) will be planned and implemented by the SPV on a case-by-case basis. 2) Livelihood Restoration, Improvement and Assistance: The users of affected lands will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(ii) Affected Houses				
Loss of **formal** residential houses	Owner of affected house	Houses on private lands: 175 parcels – 231 houses (see Section 3.2.2 and Supplementary RAP Data on Affected Structures – Volume 1: Affected Houses)	In accordance with the Expropriation Law, cash compensation residential structures is provided by KGM. The valuation of these assets is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019, valuers based on building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. **Depreciation** is applied according to the depreciation ratios stipulated in the applicable Turkish legislation. In cases of **joint landownership**, compensation is paid to the **owner** of the structure, 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.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the affected houses at least **3 months**[86] in **advance of the start of expropriation.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the owner of the affected house. **OR** If expropriation has already been concluded (through Article 8 or Article 27), the SPV will notify the owner of the Project schedule, and the owner will be granted a **6-months period** to vacate the property following the notification. 2) Top-up Cash Compensation to achieve Full Replacement Value for Residential Building: Top-up cash compensation will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof) in order to cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. - **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days**[87] following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the 45-day payment period will begin from the date of the Finance Agreement signing. PAPs with eligible compensation will be informed at the start of the public disclosure process. - **Court cases as per Law:** The payment will be made within **45 calendar days** following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. **In cases of joint landownership, the SPV will monitor whether the structure owner has obtained formal consent from the other co-owners confirming their ownership rights. If such consent is not in place, the SPV will plan and implement corrective actions to ensure that the house owner receives compensation for the house at full replacement cost or provided with a replacement house.** 3) House Relocation Support Package: The SPV will provide a cash compensation package to the owners of houses **prior to relocation**, to cover the following relocation-related costs. - Title deed transfer costs: 2% of the building value (as identified in the Valuation Study– without depreciation) - Real estate agent service fee: 2% of the building value (as identified in the Valuation Study – without depreciation) - Working capital fund ("*doner sermaye*") for title deed transactions for new purchases (no limit – specific to each district), - Allowance for other relocation related expenses: 500 EUR per household for utility subscription fees, etc. During the early consultations and notification for land acquisition process, the SPV will provide written information to the owner detailing the content, amount, and delivery timeline of the **House Relocation Support Package.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the owner to sign a notarised **Commitment Letter**, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the owner regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. The package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the notarised Commitment Letter between the owner and the SPV. 4)Replacement Land Search Support and Support for Replacement Housing Construction: In addition to the relocation support package, the SPV will assist in finding a replacement residential house of equal or greater value, with equivalent or better characteristics and a comparably advantageous location **or** identifying suitable replacement land for the construction of a new house at acceptable standards with security of tenure. **The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as private, treasury, non-registered) on which the house can be built with security of tenure.** Additionally, the SPV and EPC construction teams will assign civil engineers and technicians to advise and supervise affected individuals who prefer to construct their own houses. These technical personnel will 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 will be temporarily provided to assist affected households during the construction of their replacement homes.

[86] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

[87] This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				5)Moving and travelling allowance: The SPV will reimburse the moving and travel costs incurred by the owners, based on submitted evidence or documentation, at the time the expenses are incurred. For RAP Fund budgeting purposes, an allowance of up to **EUR 1,000** per household is assumed. 6)Livelihood Restoration, Improvement and Assistance: Please refer to the "**Affected Lands**" section of the Entitlement Matrix for provisions applicable to owners/shareholders who use the affected land – on which the impacted house is located – for agricultural purposes. 7)Right to salvage materials: The owner will be granted the right to salvage recoverable building materials prior to demolition. 8)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams: - Real estate search support, in addition to the House Relocation Support Package, if requested by the PAPs - Assistance with registering children at new schools, if needed - Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) - Case-specific measures to ensure the comfort of vulnerable household members during relocation
	Formal user (formal tenant)	Households within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Among 99 households surveyed (11%): - 4 formal renters - 7 formal users, with no rental payment Information on households and individuals are kept in the PAP Database of the Project.	In accordance with the law, **no compensation** is provided to formal tenants. However, the owner and tenant may reach a separate agreement based on the terms and conditions of the tenancy contract.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the tenant of the affected houses at least **3 months**[88] in **advance of the start of expropriation.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation to the owner, or once mutual agreements/consent protocols have been concluded with the owner of the affected house in consultation with the tenant. 2) House Relocation Support Package: The SPV will provide a cash compensation package to the tenants of houses **prior to relocation**, to cover the following relocation-related costs. - Rental allowance: A **three-month** rent allowance, based on the market rental rate of the replacement house to be rented (assumed to be twice the current rent), will be provided. - Real estate agent service fee: Equivalent to the market rental rate of the replacement house to be rented (assumed to be twice the current rent for RAP budgeting purposes) - Allowance for other relocation related expenses: 500 EUR per household for utility subscription fees, tenancy registration, etc. - Allowance for unforeseen expenses (such as fixed investments made by the renter) (assumed 10% of the house relocation support package) During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the tenant to sign a notarised **Commitment Letter**, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the tenant regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. The package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the notarised Commitment Letter between the owner and the SPV. In addition to the relocation support package, if requested by the PAP, the SPV will provide assistance for finding replacement residential house of equal or higher value (with equivalent of better characteristics and advantageous location). 3) Moving and travelling allowance: The SPV will reimburse the moving and travel costs incurred by the tenants based on submitted evidence or documentation, at the time the expenses are incurred. For RAP Fund budgeting purposes, an allowance of up to **EUR 1,000** per household is assumed. 4)Livelihood Restoration, Improvement and Assistance: Please refer to the "**Affected Lands**" section of the Entitlement Matrix for provisions applicable to users of affected lands – on which the impacted house is located – for agricultural purposes. 5)Right to salvage materials: The tenant will be granted the right to salvage recoverable building materials prior to demolition, in accordance with any applicable provisions of the rental agreement between the tenant and the owner. 6)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams: - Real estate search support, in addition to the House Relocation Support Package, if requested by the PAPs - Assistance with registering children at new schools, if needed - Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) - Case-specific measures to ensure the comfort of vulnerable household members during relocation

[88] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	Informal users	Households within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Among 99 households surveyed (36%): - 36 informal house on public land Information on households and individuals are kept in the PAP Database of the Project.	In accordance with the law, **no compensation** is provided to informal tenants.	The same entitlements specified for **formal users** (above) will apply, where applicable.
Loss of **informal** residential houses	Owner or user of **informal house**	Houses on **treasury lands** (40 parcels): - Sarıabalı (164/14, 164/25, 164/32, 164/33, 249/5, 249/6, 288/1, 302/1, 288/4, 248/2, 116/10, 282/5, 134/15) - Çakış (128/174) - Taşağıl (347/2, 908/1, 910/1) - Çolaklı (884/1, 959/13, 959/25) - Seki (832/4) - Şişeler (142/6) - Bucakşeyhler (205/19) - Aşağıışıklar (208/2) - Uzunlar (185/5, 187/2, 211/32) - Hacıobası (132/72, 132/70) - Alara (156/90, 158/15, 113/344) - Çakallar (137/5) - Toslak (251/39, 251/46, 251/47, 251/48, 319/2) - Emişbeleni (220/1, 183/6) Houses on **forest lands, including treasury-forestry** (9 parcels): - Sarıabalı (167/1) - Taşağıl (644/1, 646/1) - Avsallar (OR2) - Türkler (360/1, OR1) - Toslak (251/39, 382/1, 387/1) Houses on **non-registered lands** (5 parcels): - Şişeler (Dere-1) - Taşağıl (Park2) - Alara (TH1) - Avsallar (OR2) - Telatiye (Yol2)	In accordance with the law, **no compensation** for house or land is provided to owners of informal houses.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the affected informal houses at least **3 months**[89] in **advance of the start of expropriation.** 2) Cash Compensation at Full Replacement Value for Residential Building: Cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof). The payment will be made together with the house relocation package (**next item**). 3) House Relocation Support Package: The SPV will provide a cash compensation package to the owners of informal houses **prior to relocation**, to cover the following relocation-related costs. - Allowance for relocation related expenses: 500 EUR per household for utility subscription fees, tenancy registration, etc. - Allowance for unforeseen expenses (such as fixed investments made by the informal house owner) (assumed 10% of the house relocation support package) During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the informal house owner to sign a notarised Commitment Letter, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the owner regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. The package will be delivered as a one-off cash compensation within **15 days** following the execution of the notarised Commitment Letter between the owner and the SPV. 4)Replacement Land Search Support and Support for Replacement Housing Construction: The SPV will assist in finding a replacement residential house or identifying suitable replacement land for the construction of a new house at acceptable standards with security of tenure.**The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the house can be built with security of tenure.** Additionally, the SPV and EPC construction teams will assign civil engineers and technicians to advise and supervise affected individuals who prefer to construct their own houses. These technical personnel will 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 will be temporarily provided to assist affected households during the construction of their replacement homes. 5)Moving and travelling allowance: The SPV will either arrange the full relocation or reimburse the moving and travel costs incurred by the owners, based on submitted evidence or documentation, at the time the expenses are incurred. For RAP Fund budgeting purposes, an allowance of up to **EUR 1,000** per household is assumed. 6)Livelihood Restoration, Improvement and Assistance: Please refer to the "Affected Lands" section of the Entitlement Matrix for provisions applicable to users of affected lands – on which the impacted house is located. 7)Right to salvage materials: The informal house owner will be granted the right to salvage recoverable building materials prior to demolition. 8)Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams: - Real estate search support, in addition to the House Relocation Support Package, if requested by the PAPs - Assistance with registering children at new schools, if needed - Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) - Case-specific measures to ensure the comfort of vulnerable household members during relocation

[89] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

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(iii) Affected Greenhouses				
Affected Greenhouses	Owner/shareholder of the private land, owner of the greenhouse	**Greenhouses on private land:** - **Private:** 676 greenhouses on 268 parcels - **Litigious:** 8 greenhouses on 5 parcels	For the compensation of the owner and users (Formal and informal) of **affected lands**, please refer to the "Affected Lands" section of the Entitlement Matrix. In accordance with the Expropriation Law, cash compensation for **greenhouses** is provided by KGM to the **owner of the greenhouse**. The valuation is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019. Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation. In this Project, for parcels containing **greenhouses**, the parcel is expropriated fully if the remaining area is **less than 400 m²,** as confirmed by the experts from the KGM's Regional Directorate – Department of Immovables. In expropriations involving greenhouses, the KGM generally does not consider irrigation systems in the valuation, unless there are exceptional circumstances. In other words, no compensation is paid for the irrigation systems, and their relocation (disassembly-assembly) is typically not taken into account either. Therefore, a payment will be required to cover the cost of dismantling and reinstalling the irrigation and drainage systems in the greenhouses, to be paid to the owners/users.	1)Top-up Cash Compensation to achieve Full Replacement Value of the Structures: Top-up cash compensation will be provided by the SPV from the RAP Fund to the **greenhouse owner** in order to cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. - **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days**[90] following the transfer of title deeds of the respective lands to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owners/shareholders by KGM. OR for cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the 45-day payment period will begin from the date of the Finance Agreement signing. PAPs with eligible compensation will be informed at the start of the public disclosure process. - **Court cases as per Law:** The payment will be made within **45 calendar days** following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. 2) Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost: If not included in the expropriation value provided by KGM, the SPV will pay 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. (please refer to "moving support" for movable components). A third-party valuation expert to be retained by the SPV will determine the cost of fixed (non-movable) investments/improvements based on market prices. **This will be completed prior to early consultations and notification for land acquisition process.** The cost of fixed investments/improvements already included in the valuation reports of KGM, if any, will be deducted from the payment to be done by the SPV from RAP Fund. Additionally, the RAP Fund has allocated a budget item to cover costs incurred by greenhouse owners whose greenhouses are partially expropriated. This funding is intended 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. 3) Cash Compensation for Crops: If land entry by the EPC Contractor is required before the end of the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) within the greenhouse are made to the greenhouse owners **prior to land entry**. If the greenhouse is partially affected, crop compensation will be provided for the affected part. 4)Replacement Land Search Support: The SPV will assist in identifying a replacement site for the relocation of the greenhouse, if such relocation is planned by the greenhouse owner. The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel on which the greenhouse can be rebuilt with security of tenure. 5)Land Preparation Support: If requested, the SPV will support the preparation of the land where the greenhouse will be reestablished. This support may include the provision of construction machinery and labour, land levelling, provision of suitable topsoil stripped from Project areas, infrastructure connections for electricity, water, and other utilities, etc. If the greenhouse is partially affected and the owner continues operations on the remaining land, the SPV will assist the owner in rearranging the greenhouse to ensure continuity of operations (rearrangement of irrigation system, drainage system, heating system, etc.), if requested. 6)Moving support: The SPV will either arrange the full relocation or reimburse the moving costs (disassembly-assembly) incurred by the greenhouse owners for their movable assets and infrastructure components (such as movable irrigation system components), based on submitted evidence or documentation, at the time the expenses are incurred. For RAP Fund budgeting purposes, an allowance of up to **EUR 500** per household is assumed. The relocation of vegetable saplings or trees is not considered feasible by the greenhouse owners. 7)Livelihood Restoration, Improvement and Assistance: The greenhouse owners will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8. 8)Soft Support: The SPV will inform landowners and shareholders of their right to apply for the acquisition of orphan land in accordance with the Expropriation Law. In cases where the unacquired portion of land ranges between 400–500 m², the SPV will consult with KGM to facilitate the acquisition of the remaining portion, as 500 m² is considered the minimum economically viable size for greenhouse operations.

[90] This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	Formal **tenant** of the land, **owner of the greenhouse**	**See above.** Greenhouses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on households and individuals are kept in the PAP Database of the Project.	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 valuation is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019. Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.	All relevant entitlements outlined above for the "**Owner/shareholder of the Private Land, Owner of the greenhouse**" apply. 1)Compensation of rental fees paid in advance by long-term tenants or fees stemming from special formal tenancy agreement conditions: ○ For long-term tenants who have paid rent in advance, if the landowner does not refund the unused portion of the rental payment, the outstanding amount will be compensated 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). ○ Where applicable, special case-by-case provisions based on the specifics of tenancy agreements will be reviewed and evaluated either by a third-party valuation expert to be commissioned by the SPV, in consultation with the District Directorates of Agriculture, as appropriate. If necessary, compensation will be provided to ensure that tenants are not disadvantaged in cases where they are fined under their lease agreements due to early termination. All costs related to such reviews and assessments will be covered by the SPV, provided that appropriate evidence is submitted. 2) Transitional rental allowance for formal replacement land to be rented (for 1-year): If the tenant greenhouse owner finds replacement land for formal lease, the SPV will provide **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. The rental allowance will be calculated based on the maximum market rental rates for greenhouses recorded in the national Farmer Registration System for the relevant year.
	Formal tenant of the greenhouse on lands owned by others (not the owner of the greenhouse)	**See above.** Greenhouses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on households and individuals are kept in the PAP Database of the Project.	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.	Except for "**Top-up Cash Compensation to achieve Full Replacement Value of the Structures",** all relevant entitlements, outlined above for the "**Owner/shareholder of the Private Land, Owner of the greenhouse**" apply. All entitlements outlined above for the "Formal **tenant** of the land, **owner of the greenhouse**" apply.
	Informal user of **treasury lands,** owner of the greenhouse (with no official documentation for land use but can prove their ownership of the structure)	**Treasury lands (48 parcels):** - Sarıabalı (12) - Burmahancı (1) - Taşağıl (1) - Kalemler (1) - Ulukapı (1) - Uzunlar (2) - Örenşehir (2) - Yalçıdibi (1) - Taşağıl (2) - Kalemler (1) - Evren (1) - Hacıobası (1) - Alara (3) - Payallar (1) - Emişbeleni (3) - Toslak (9) - Elikesik (3) - Telatiye (1) - Emişbeleni (2)	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 is paid to the possessor.	Except "Top-up Cash Compensation to achieve Full Replacement Value", all other entitlements outlined above for the "**Owner/shareholder of the Private Land, Owner of the greenhouse**" apply. 1)Top-up Cash Compensation to achieve Full Replacement Value: In case there are greenhouses owned by the informal users on affected **treasury** land, KGM pays for **minimum material cost as per Article 19** of the Expropriation Law, thus top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings). 2) Transitional rental allowance for formal replacement land to be rented (for 1-year): If the tenant greenhouse owner finds replacement land for formal lease, the SPV will provide **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. The rental allowance will be calculated based on the maximum market rental rates for greenhouses recorded in the national Farmer Registration System for the relevant year.
	Informal user of **forest and pasture lands**, owner of the greenhouse or greenhouse owners with no official documentation proving their ownership of the structure	**Greenhouses on forest land (12 parcels):** - Taşağıl (346/1) (1) - Karaöz (174/1) (1) - Yalçıdibi (132/1) (1) - Türkler (OR1) (1) - Payallar (936/1) (1) - Emişbeleni (203/1) (1) - Toslak (387/1, 317/2, 319/1) (3) - Elikesik (173/74) (1) - TElatiye (438/5) (1) - Emişbeli (279/1) (1) Greenhouses on pasture lands: **None**	**No compensation** is provided under the Expropriation Law.	Except "Top-up Cash Compensation to achieve Full Replacement Value", all other entitlements outlined above for the "**Owner/shareholder of the Private Land, Owner of the greenhouse**" apply. 1)Cash Compensation at Full Replacement Value: For informal users of forest lands, KGM has decided to formally engage with the Antalya Regional Directorate of Forestry to explore the feasibility of providing compensation under the applicable legal framework and to agree on the method to be followed. If the 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, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owners of the assets by the SPV from the RAP Fund. 2) Transitional rental allowance for formal replacement land to be rented (for 1-year): If the **informal** greenhouse owner finds replacement land for formal lease, the SPV will provide **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. The rental allowance will be calculated based on the maximum market rental rates for greenhouses recorded in the national Farmer Registration System for the relevant year.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(iv) Affected Businesses				
Business owners				
Loss of rented business structure by the owner of the building	Not a business owner at the affected business structure but the owner of the affected building	Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Please see Table 3-21. Information on businesses are kept in the PAP Database of the Project.	As per the Expropriation Law, cash compensation is provided to structure owners by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.	1)Top-up Compensation to Cover Depreciation Cost of the Building (to achieve Full Replacement Value for Business Structure – to be provided on top of mandatory cash compensation provided by KGM): Top-up cash compensation will be provided by the SPV from the RAP Fund to the **structure owner** in order to cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. 2) Soft support: The SPV will closely collaborate with KGM in the planning and execution of the building's evacuation, ensuring full alignment with Lenders' requirements to prevent forced eviction.
Business owners – which will be resettled permanently	Formal business owner – "**owner**" of the affected business structure	Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Please see Table 3-21. Information on businesses are kept in the PAP Database of the Project.	As per the Expropriation Law, cash compensation is provided to structure owners by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. Depreciation is deducted in accordance with the depreciation ratios set out in the relevant Turkish legislation. The valuation reports for the alignment are largely still under preparation. As part of KGM's valuation process, there is no known evidence that a mechanical engineer has been appointed by the valuation contractor (a national engineering company) to determine the market value of fixed (non-movable) investments and interior improvements within business structures. Furthermore, there is no available information on whether or to what extent assembly and disassembly costs – related to the transportation of movable machinery and equipment such as generators, fences, pumps, cooling systems, and fire-fighting equipment, if present within the affected buildings –have been assessed. During the Article 8 negotiations, KGM will require the owner of the affected business structure to confirm which assets are owned by them and which belong to the tenants. The SPV will ensure that tenants are also present during the Article 8 negotiations to verify the ownership status of assets located on the affected parcel. If both the owner and the tenants provide their consent, KGM will directly compensate the tenants for the non-movable and movable assets determined to be in their ownership. If there is no agreement between the owner and the tenants at this stage regarding the ownership of assets included in the valuation, KGM will provide the compensation for those assets to the building owner. Any dispute between the parties may then be pursued under the relevant national legislation, should the parties choose to do so. In cases where no agreement is reached between KGM and the building owner under Article 8, KGM ensures that the tenants are included as parties to the court proceedings initiated under Article 27, and compensation is provided by KGM in accordance with the court's decision.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner at least **3 months**[91] **in advance of the start of expropriation**. Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the owner of the business structures/business owners. The SPV will closely collaborate with KGM in the planning and execution of the building's evacuation, ensuring full alignment with Lenders' requirements to prevent forced eviction. During the early consultations and notification for land acquisition process, the SPV will provide written information to the business owner detailing the content, amount, and delivery timeline of the **Pre-Relocation Financial Support Package.** 2) Top-up Compensation to Cover Depreciation Cost of the Building (to achieve Full Replacement Value for Business Structure – to be provided on top of mandatory cash compensation provided by KGM): Top-up cash compensation will be provided by the SPV from the RAP Fund to the **structure owner** in order to cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM. **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days**[92] following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the 45-day payment period will begin from the date of the Finance Agreement signing. PAPs with eligible compensation will be informed at the start of the public disclosure process. **b) Court cases as per Law**: The payment will be made within **45 calendar days** following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. 3)**Pre-relocation** Financial Support Package for Business owners: The SPV will provide a **Pre-Relocation Financial Support Package** to business owners, consisting of the following items (please refer to the list below for details on payment conditions and timelines): **3.1) Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost** done by the business owner at the existing business structure will be paid by the SPV to business owner. This will cover fixed investments/improvements done for the interiors and exteriors of the building. A third-party expert specialised in machinery, construction, valuation, etc. (as relevant) to be retained by the SPV, in consultation and agreement with the business owner, will determine the cost of fixed (non-movable) investments/improvements based on market prices. **This will be completed prior to early consultations and notification for land acquisition process.** The cost of fixed investments/improvements already included in the valuation reports of KGM, if any, will be deducted from the payment to be done by the SPV from RAP Fund. **3.2) Moving allowance to cover disassembly, transportation and assembly costs** for relocation of movable assets (e.g. machinery, equipment, stock of materials/products, etc.) to the new workplace. Moving costs are specific to each business. A third-party expert Independent Expert(s) specialised in machinery, construction, valuation, logistics, etc. (as relevant) to be retained by the SPV or professional moving/logistics firms (based on price quotations/proposals to be approved by the SPV) will determine the moving cost specific to each business to be relocated. **This will be completed prior to early consultations and notification for land acquisition process.** Prior to Article 8 negotiations, the SPV will engage with the owner of buildings and their tenants to identify/document the ownership status of the fixed assets/improvements made on the affected building, and where possible provide related documentation to KGM prior to sending out Article 8 invitations to owners. The disassembly-assembly ("*montaj-demontaj*") costs already included in the valuation reports of KGM, if any, will be deducted from the payment to be done by the SPV from RAP Fund.

[91] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

[92] This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				3.3) Business relocation support package to cover other relocation-related expenses such as real estate agent service fee, title deed transfer costs, potential transaction costs, subscription fees, permit renewal costs including preparation of relevant documentation, cost of approvals to be secured from related authorities, etc. Other relocation-related expenses are specific to each business (e.g. environmental permits, H&S related permits and approvals, etc.). For RAP budgeting purposes, up to **5%** of the full replacement value of the business structure/building. The external Business Advisor(s) retained by the SPV will review each business to determine the amount of the package to be provided to each business owner in consultation and agreement with them. **For the delivery of cash compensation**, following the early consultations and notification for land acquisition process, the SPV will require the business owner to mutually sign a notarised Commitment Letter undertaking to relocate to new workplace as per the timeframe to be agreed with the SPV (in alignment with the expropriation programme of KGM and up-to-date construction programme of SPV) on condition that the Pre-relocation Financial Support Package is delivered by the SPV within the agreed timeframes. For **both Agreement (as per Article 8)** and **Court cases as per Law**, the package will be delivered either at once (one-off cash compensation) or based on milestones. This will be decided by the SPV, with support from the external Business Advisor(s) to be retained, on a case-by-case basis in line with the agreed relocation timeframes and needs of the affected businesses. At minimum, the initial payment milestone to cover cost of fixed (non-movable) investments/improvements will be within **15 days** upon execution of the notarised Commitment Letter between the Business Owner and the SPV. This is to allow the business owners to conduct necessary preparation works at the new premises (e.g. electricity, ventilation, fire-fighting, illumination infrastructure, etc. as relevant). The SPV will coordinate the process in alignment with the corporate procedures of SPV regarding management of administrative affairs and procurement processes. For example, the SPV may prefer to directly pay the invoice of the moving/logistics firm or provide the moving allowance to business owner (method to be decided by the SPV during implementation based on corporate administrative and procurement policies). 4)Post-relocation Financial Support Package for Business owners: **Monthly net income loss support** to cover economic losses during temporary business interruption period **up to 6 months** until successful reestablishment of the affected business: The SPV will provide monthly cash compensation support to affected business owners to compensate net income loss during the temporary business interruption period (**6 months**). The SPV, with support from the external Business Advisor(s) to be retained, in consultation and agreement with the business owner, will review each business to determine the amount of net income loss support for each business owner, with support from financial and accounting teams of the SPV based on official financial and accounting records (e.g. official tax declarations, accounting balance sheets of the last 3 years, etc.). For RAP budgeting purposes, net incomes (for the last 3 years) declared by the business owners as part of the RAP surveys have been taken into consideration. The business owners have been informed that their declarations will be subject to verification by the SPV teams prior to delivery of support. The SPV, with support from the external Business Advisor(s) to be retained and consultants, will monitor the relocation process and confirm successful re-establishment of business at the new premises to cease monthly support. If the support duration is required to be extended due to significant impacts, this will be evaluated and actions will be planned accordingly in line with Lenders' requirements. If the employees resign due to business relocation in line with the Labour Law, compensation for severance payments will be provided to the business owners for being paid to employee to fulfil their liabilities under the Labour Law (In this case, no financial support will be provided to the employees as foreseen under "Business employees- temporary loss of income due to business interruption during relocation"). 5)External Business Advisory Services: The SPV will retain external Business Advisor(s) specialised in business development and management for micro, small and medium sized enterprises. The consultancy services by the external Business Advisor(s) will be provided for **36 months** – throughout the RAP implementation period.
	Informal business owner – "owner" of the affected business structure	Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Please see Table 3-21. Information on businesses are kept in the PAP Database of the Project.	**No compensation** is required for the land in accordance with the law. However, structures owned by informal business owners are compensated under the conditions set forth in the Expropriation Law.	The same entitlements specified for formal business owners will apply. The SPV, with support from third-party implementation partners and consultants, will determine the documentation required to serve as the basis for financial support packages (e.g. net income for the past three years, employee gross salaries, etc.).
	Formal business owner – "**tenant**" of the affected business structure	Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Please see Table 3-21. Information on businesses are kept in the PAP Database of the Project.	As per the Expropriation Law, cash compensation is provided to structure owners by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the tenant business owner at least 3 months[93] in advance of the start of expropriation. Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the owner of the affected business structure in consultation with the tenant.

[93] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			Depreciation is deducted in accordance with the depreciation ratios set out in the relevant Turkish legislation. The valuation reports for the alignment are largely still under preparation. As part of KGM's valuation process, there is no known evidence that a mechanical engineer has been appointed by the valuation contractor (a national engineering company) to determine the market value of fixed (non-movable) investments and interior improvements within business structures. Furthermore, there is no available information on whether or to what extent assembly and disassembly costs – related to the transportation of movable machinery and equipment such as generators, fences, pumps, cooling systems, and fire-fighting equipment, if present within the affected buildings –have been assessed. During the Article 8 negotiations, KGM will require the owner of the affected business structure to confirm which assets are owned by them and which belong to the tenants. The SPV will ensure that tenants are also present during the Article 8 negotiations to verify the ownership status of assets located on the affected parcel. If both the owner and the tenants provide their consent, KGM will directly compensate the tenants for the non-movable and movable assets determined to be in their ownership. If there is no agreement between the owner and the tenants at this stage regarding the ownership of assets included in the valuation, KGM will provide the compensation for those assets to the building owner. Any dispute between the parties may then be pursued under the relevant national legislation, should the parties choose to do so. In cases where no agreement is reached between KGM and the building owner under Article 8, KGM ensures that the tenants are included as parties to the court proceedings initiated under Article 27, and compensation is provided by KGM in accordance with the court's decision.	The SPV will closely collaborate with KGM in the planning and execution of the building's evacuation, ensuring full alignment with Lenders' requirements to prevent forced eviction. During the early consultations and notification for land acquisition process, the SPV will provide written information to the business owner detailing the content, amount, and delivery timeline of the **Pre-Relocation Financial Support Package.** 2) Pre-relocation Financial Support Package for Tenant Business owners: The SPV will provide a **Pre-relocation Financial Support Package to Business owners (tenant)** consisting of the following items (please refer to the list below for details on payment conditions and timelines): **2.1) Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost** done by the tenant business owner at the existing business structure will be paid by the SPV to tenant business owner. This will cover fixed investments/improvements done for the interiors and exteriors of the building. A third-party expert specialised in machinery, construction, valuation, etc. (as relevant) to be retained by the SPV, in consultation and agreement with the business owner, will determine the cost of fixed (non-movable) investments/improvements based on market prices. **This will be completed prior to early consultations and notification for land acquisition process.** **2.2) Moving allowance to cover disassembly, transportation and assembly costs** for relocation of movable assets (e.g. machinery, equipment, stock of materials/products, etc.) to the new workplace. Moving costs are specific to each business. An third-party expert specialised in machinery, construction, valuation, logistics, etc. (as relevant) to be retained by the SPV or professional moving/logistics firms (based on price quotations/proposals to be approved by the SPV) will determine the moving cost specific to each business to be relocated. **This will be completed prior to early consultations and notification for land acquisition process.** Prior to Article 8 negotiations, the SPV will engage with the owner of building and their tenants to identify/document the ownership status of the fixed assets/improvements made on the affected building, and where possible provide related documentation to KGM prior to sending out Article 8 invitations to owners. - **Agreement cases (per Article 8):** The disassembly-assembly ("*montaj-demontaj*") costs already included in the valuation reports of KGM, if any, and paid by KGM directly to the tenants (if this is the case) will be deducted from the payment to be done by the SPV from RAP Fund. If these costs are not paid to the tenants by KGM (i.e. tenants may be required to manage recovery of such costs from the owners based on their tenancy agreements), then they will be covered by the SPV from the RAP Fund. - **Disagreement cases**: KGM ensures that tenants become party to Article 27 court cases and the compensation is provided by the KGM in line with the court decisions. The SPV will monitor the outcomes of the court cases and a third-party valuation expert will decide on if additional compensation from RAP Fund is required to be provided to the tenants. **2.3) Business Relocation Support Package to cover other relocation-related expenses** such as real estate agent service fee, title deed transfer costs, potential transaction costs, subscription fees, permit renewal costs including preparation of relevant documentation, cost of approvals to be secured from related authorities, etc. - Rental allowance: A **three-month** rent allowance, based on the market rental rate of the replacement business structure to be rented (assumed to be twice the current rent), will be provided. - Real estate agent service fee: Equivalent to the market rental rate of the replacement business structure to be rented (assumed to be twice the current rent for RAP budgeting purposes) - Allowance for other relocation related expenses: specific to each business (e.g. environmental permits, H&S related permits and approvals, etc.). For RAP budgeting purposes, assumed up to **5%** of the full replacement value of tenant business owner's workplace within the affected building (as identified in the valuation reports without depreciation). The external Business Advisor(s) to retained by the SPV will review each business to determine the amount of the **Business Relocation Support Package** to be provided to each tenant business owner in consultation and agreement with them. **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the tenant business owner to mutually sign a notarised Commitment Letter undertaking to relocate to new workplace as per the timeframe to be agreed with the SPV (in alignment with the expropriation programme of KGM and up-to-date construction programme of SPV) on condition that the Pre-relocation Financial Support Package is delivered by the SPV within the agreed timeframes. For **both Agreement (consent as per Art. 8)** and **Court cases as per Law,** the package will be delivered either at once (one-off cash compensation) or based on milestones. This will be decided by the SPV on a case-by-case basis in line with the agreed relocation timeframes and needs of the affected businesses. At minimum, the initial payment milestone to cover cost of fixed (non-movable) investments/improvements will be within **15 days** upon execution of the notarised Commitment Letter between the Business Owner and the SPV. This is to allow the tenant business owners to conduct necessary preparation works at the new premises (e.g. electricity, ventilation, fire-fighting, illumination infrastructure, etc. as relevant). The SPV will coordinate the process in alignment with the corporate procedures of SPV regarding management of administrative affairs and procurement processes. For example, the SPV may prefer to directly pay the invoice of the moving/logistics firm or provide the moving allowance to business owner (method to be decided by the SPV during implementation based on corporate administrative and procurement policies).

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				3)Post-relocation Financial Support Package for Business owners: **Net income loss support** to cover economic losses during temporary business interruption period **up to 6 months** until successful reestablishment of the affected business: The SPV will provide monthly cash compensation support to affected business owners to compensate net income loss during the temporary business interruption period (**6 months**). The SPV, with support from the external Business Advisor(s) in consultation and agreement with the business owner, will review each business to determine the amount of net income loss support for each business owner, in consultation and agreement with the tenant business owner, with support from financial and accounting teams of the SPV based on official financial and accounting records (e.g. official tax declarations, accounting balance sheets of the last 3 years, etc.). For RAP budgeting purposes, net incomes (for the last 3 years) declared by the business owners as part of the RAP surveys have been taken into consideration. The business owners have been informed that their declarations will be subject to verification by the SPV teams prior to delivery of support. The SPV, with support from the external Business Advisor(s) and consultants, will monitor the relocation process and confirm successful re-establishment of business at the new premises to cease monthly support. If the support duration is required to be extended due to significant impacts, this will be evaluated and actions will be planned accordingly in line with Lenders' requirements. If the employees resign due to business relocation in line with the Labour Law, compensation for severance payments will be provided to the business owners for being paid to employee to fulfil their liabilities under the Labour Law (In this case, no financial support will be provided to the employees as foreseen under "Business employees- temporary loss of income due to business interruption during relocation"). 4)External Business Advisory Services: The SPV will retain external Business Advisor(s) specialised in business development and management for micro, small and medium sized enterprises. The consultancy services by the external Business Advisor(s) will be provided for **36 months** – throughout the RAP implementation period.
	Informal business owner – "**tenant**" of the affected business structure	None	**No compensation** is required for the land in accordance with the law. However, structures owned by informal business owners are compensated under the conditions set forth in the Expropriation Law.	The same entitlements specified for formal business owners will apply. The SPV, with support from the external Business Advisor(s) and consultants, will determine the documentation required to serve as the basis for financial support packages (e.g. net income for the past three years, employee gross salaries, etc.).
Loss of informal business structures	Owner or user of informal business structure	Business structures on **treasury** lands: - Taşağıl (515/179) - Emişbeleni (144/3) – livestock breeding farm - Toslak (326/66) Business structures on **forest** lands: **None**	In accordance with the law, **no compensation** for the business structure or land is provided to owners of informal business structures.	1)Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner at least **3 months**[94] in **advance of the start of expropriation.** 2) Cash Compensation at Full Replacement Value for Residential Building: Cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof). The payment will be made together with the house relocation package (**next item**). 3) Pre-relocation Financial Support Package for Business owners House Relocation Support Package: The SPV will provide a cash compensation package to the owners of informal business structures **prior to relocation**, to cover the following relocation-related costs. **The content and delivery method will be same with the package offered to owners of formal business structures.** During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package.** 4)Replacement Land Search Support: The SPV will assist in finding a replacement business structure or identifying suitable replacement land for the construction of a new business structure at acceptable standards with security of tenure. **The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the business structure can be built with security of tenure.** 5)Post-relocation Financial Support Package for Business owners: **The content and delivery method will be same with the package offered to owners of formal business structures.**
Business owners – which would terminate operations (business shut-down)	Business owners	2 of the affected businesses have indicated a potential to terminate operations as a result of Project-related land acquisition and relocation. Small-scale road side local product vendors (informal) in Hacıobası, Manavgat, located within the expropriated area of the existing	In accordance with the Expropriation Law, **no compensation** is provided for loss of income in the event that a business ceases operations after resettlement.	1)Financial Support Package for Business owners: 2 of the affected businesses have expressed a potential to terminate operations due to Project-related land acquisition and relocation. The entitlements outlined in this RAP are designed to support the continuation of business activities under conditions that are at least equivalent to, or preferably better than, those prior to relocation. The SPV will monitor the operations of the affected businesses throughout the RAP implementation period to ensure this objective is met. In cases where business termination is unavoidable and directly linked to relocation (this will be confirmed by the external Business Advisor(s) to be retained by the SPV), the SPV will provide one-off cash compensation support to the affected business owners. The external Business Advisor(s) will determine the valuation criteria and the appropriate level of support on a case-by-case basis, using official financial and accounting records (e.g. tax declarations, balance sheets from the previous year, etc.).

[94] This takes into consideration that it may take at least 3 months for the title deed transactions to pass to KGM after start of expropriation and 15 days is further granted to affected people by Law to vacate the land from the date of finalization of the title deed registration – notifying 3 months in advance of start of expropriation allows affected people at least 6 months and 15 days from the date of early consultations and notification for land acquisition process to vacate the land prior to land entry. This is to avoid forced eviction and allow sufficient time for resettlement planning and preparation. The SPV will collaborate with KGM for the planning and coordination of evacuation process.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
		state road D-695, as listed in Table 3-23 may potentially shut-down.		2) Opportunities for Project Employment: These business owners and their employees will be given priority consideration for employment opportunities generated by the Project. Employment will be contingent upon meeting relevant job requirements, and the RAP Implementation Team will assist in identifying suitable roles, supporting applications, and providing any necessary orientation or training. 3) Access to External Business Advisory Services: The SPV will retain external Business Advisor(s) specialised in business development and management for micro, small and medium sized enterprises. The consultancy services by the external Business Advisor(s) will be provided for **36 months** – throughout the RAP implementation period.
Business owners who will not be relocated but may experience partial loss of land and/or assets	"Owner" of the affected business structure	Please see Table 3-22. - 2 treasury - 3 non-registered - 25 private	In accordance with the Expropriation Law, cash compensation is provided by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.	1)Top-up Cash Compensation to Cover Depreciation Cost of the Affected Buildings/Structures to ensure compensation at Full Replacement Cost (equivalent to depreciation reflected in KGM's Valuation Report) (only for structure owners) 2) Support by Construction Teams and Grievance Mechanism: Where appropriate, support will be provided by the SPV/EPC Contractor's construction team and vehicles to prevent potential access restrictions to the site – such as at entry/exit gates, ramps, or for the reorganisation of the layout of movable structures. The SPV/EPC Contractor will provide assistance for relocating affected movable structures and auxiliary facilities to another location within the existing premises or nearby surroundings. The moving process for these assets will be coordinated in consultation with the business owner to minimise any interruption to business operations. 3) Monitoring, Grievance Management and Corrective Actions: The SPV will collect, manage, and monitor requests and grievances in accordance with the Project's Grievance Mechanism. Any impacts on business operations – such as access restrictions caused by construction or during the operational phase – will be identified on a case-by-case basis, and corrective actions will be developed and implemented in consultation with the business owners. 4)Access to External Business Advisory Services: The SPV will retain external Business Advisor(s) specialised in business development and management for micro, small and medium sized enterprises. The consultancy services by the external Business Advisor(s) will be provided for **36 months** – throughout the RAP implementation period.
	"Tenant" of the affected business structure		Structures owned by tenants are compensated in accordance with the conditions set forth in the Expropriation Law.	
Employees				
Temporary income loss by the employees – due to (i)being sent by the business owner unpaid leave during business interruption period (ii) delayed salary payment during business interruption period	**Formal** employees of affected businesses (incl. employees with vulnerabilities such as disabled and migrant)	**131 employees** (including male and female) Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on businesses and their employees are kept in the PAP Database of the Project.	Under the Turkish Expropriation Law, no compensation is required for loss of income of either formal or informal employees of the affected businesses.	Financial Support Package to Employees: The SPV will provide financial support (gross salary) package to employees amounting up to **3 months of gross salary** per employee through the following process: 1)Census of Current Formal and Informal Employees: The SPV will identify all formal and informal employees working at the affected businesses as of the date of Early Consultations (three months prior to the start of expropriation). Employment conditions (e.g. full-time status, gross and net salaries, etc.) will be determined by the external Business Advisor(s) to be retained by the SPV as follows: - Formal employees: Based on official documentation, insurance registers, accounting records, etc. - Informal employees: Based on consultations with the affected informal employee, business owners and/or other employees and/or other relevant trustee parties (to be done at different times to verify declarations) It is assumed that finalisation of expropriation and evacuation of building (relocation) will take place within 6 months and 15 days after Early Consultations and successful reestablishment of the business at the new premises can be achieved within 6 months after relocation ("**Post Relocation and Business Reestablishment Period**"). The business owners will be required to report any employee (formal or informal) hired after the date of Early Consultations and Notification until the end of Post Relocation and Business Reestablishment Period. As required, eligibility of such employees for RAP entitlements will be reviewed and evaluated by the SPV, with support from the external Business Advisor(s). 2) Monitoring of Employment Status of Employees and Determination of Gross Salary Support Requirement: The SPV, with support from third-party implementation partners and consultants, will monitor and report the employment status of formal and informal employees for approximately 12 months after Early Consultations step. During this 12-months period after Early Consultations: **a)**If the RAP monitoring identifies that there are employees affected by temporary business interruption related to relocation (cause of the impact to be assessed and identified by the SPV with support from the external Business Advisor(s)), the gross salary of each affected employee up to 3 months will be compensated by the SPV from RAP Fund to prevent loss of income by the employee during this period. If the duration of the gross salary support is required to be extended due to significant impacts (significance of the impact to be monitored and verified by the SPV with support from the external Business Advisor(s)), this will be evaluated in consultation with Lenders and actions will be planned and implemented by the SPV accordingly. **b)**If the RAP monitoring proves that there is no adverse impact/interruption on the income of the employees, the SPV will not provide any gross salary support for the employees. 3) Payment Mechanism: As per the payment mechanism framed by the legal and financial teams of the SPV:
	Informal employees of affected businesses (including employees with vulnerabilities such as disabled and migrant)	**5 male migrants** Businesses within the RAP survey sample have been identified as part of RAP surveys completed in May 2025. Information on businesses and their employees are kept in the PAP Database of the Project.		

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
				a)For formal employees, employment status/conditions and amount of payment will be redetermined/verified by the SPV, with support from the external Business Advisor(s), according to last 6 payrolls of the employee (also Social Security Institution – SGK register for last 6 months will be requested from the business owner). During/in case of business interruption, the SPV will make gross salary payments to employees through their business owners (as the employee will remain registered under business owner's workplace during the business interruption period) on a monthly basis based on a protocol to be executed between the SPV/EPC, Employee and Business owner. The protocol will include clauses guaranteeing the following mechanism: - Business owner will execute salary payment transaction order at the bank for the relevant month. - Business owner will not interrupt insurance registration and payments of the employee. - Business owner will submit the evidence of transaction order and insurance payment documents to SPV. - SPV will make the gross salary payments to the Business owner on same day the evidence of employee salary payment transactions are submitted by the Business owner to the SPV. - All transactions between SPV, business owners and employees will be appropriately documented by the SPV. - SPV will monitor the process through consultation with the business owners and employees. **b)**For informal employees, employment status/conditions and amount of payment will be redetermined/verified by the SPV, with support from the external Business Advisor(s), based on consultations with the affected informal employee, business owners and/or other employees and/or other relevant trustee parties (to be done at different times to verify declarations) and based on review of any relevant documentation/evidence. The SPV will make gross salary payments directly to affected informal employees on a monthly basis. The transaction mechanism will be decided by the SPV in agreement with the employee through a mechanism guaranteeing that the salary compensation is received by the affected informal employee. All transactions to be done by the SPV for the benefit of informal employees will be appropriately documented by the SPV. As part of the Business Advisory Services to be provided through the livelihood restoration and improvement programme, consultancy on formalisation of informal workforce where applicable to the business (e.g. through benefiting from existing state programmes supporting formalisation of employment) will be provided by the external Business Advisor(s) to be retained by the SPV.
Permanent income loss by the employees – due to i)permanent business shut-down; ii)dismissal/ termination of employment contract by business owners; or	Formal and informal employees including vulnerable workers and women	2 of the affected businesses have expressed an intention to cease operations as a result of Project-related land acquisition and relocation.	Under the Turkish Expropriation Law, no compensation is required for loss of income of either formal or informal employees of the affected businesses.	2 of the affected businesses have expressed a potential to terminate operations due to Project-related land acquisition and relocation. The entitlements outlined in this RAP are designed to support the continuation of business activities under conditions that are at least equivalent to, or preferably better than, those prior to relocation. The SPV will monitor the operations of the affected businesses throughout the RAP implementation period to ensure this objective is met. If the RAP monitoring identifies that there are employees who are dismissed/lose their jobs **within 6 months after relocation ("Post-relocation and Business Reestablishment Period")** due to reasons (e.g. business shut down) that are not under their control and directly related/inevitable because of business relocation (such reasons are subject to review and verification by the SPV) or resign themselves due to business relocation (including vulnerable employees or women who resign due to fundamentally increased distance to the new business location) in line with the Labour Law, they will be entitled to the following: a)For formal employees, compensation for severance payments unpaid annual leaves and other gained benefits will be the liability of their official business owners in line with the Labour Law. In addition, the SPV will review the case to verify that the dismissal of the employee or resignation is directly related/inevitable due to relocation of the business as a result of the Project and in such cases, SPV will provide 3 months of gross salary support to the affected employee within 15 days following verification. The SPV support to employees will be provided as **one-off** cash compensation directly to the bank account of the affected employees. All transactions to be done by the SPV will be appropriately documented. b)For informal employees, the SPV, with support from the external Business Advisor(s), will review the case to verify that the dismissal of employee or, etc. by the employee is directly related/inevitable due to relocation of the business as a result of the Project and in such cases, the SPV will provide 3 months of gross salary support and the employee will further be entitled to the following: - Affected employee will be given priority for employment in the Project construction should they meet Project's employment criteria (e.g. education, skills, H&S considerations, etc.). - As necessary, other employee-specific measures will be developed by the SPV (e.g. specific skill trainings to increase opportunity for employment in similar or other sectors) and implemented on a case-by-case basis depending on the conditions of affected employee(s). The SPV support will be provided as one-off cash compensation through a mechanism guaranteeing that the salary compensation is received by the affected informal employee. All transactions to be done by the SPV for the benefit of informal employees will be appropriately documented. The external Business Advisor(s) to be retained by the SPV will provide the affected employees with alternative job search and skill development support for employees who may lose jobs due to relocation of businesses (including migrant workers).
(v) Vulnerable People				
Affected households with vulnerable members – may be exposed to any of the losses or impacts identified for the above PAP categories, but at a	All households that are physically and economically displaced and include vulnerable members Please see Table 12-3 for Vulnerability Matrix for **Physically Displaced Households** – 87 individuals in 99 households: 47 female + 40 male Please see Appendix I for Vulnerability Matrix for **Economically Displaced Households** – 236 individuals in 195 households: 176 female + 150 male	Under the Turkish Expropriation Law, no specific compensation or assistance is required for vulnerable people.	1)In-kind support will be provided by the SPV to the vulnerable households. For RAP budgeting purposes, in-kind support equivalent up to **6 times of applicable net minimum wage** (assumed around 3,500 EUR per household) per household has been assumed. Households to be provided with support will be further determined (depending on their vulnerability levels) by the SPV, with support from third-party implementation partners and consultants, during RAP implementation. 2) Support and/or assistance tailored to the needs of households with vulnerable members (on a case-by-case basis): Physically and economically displaced households with vulnerable members will be entitled and given priority to accessing all livelihood restoration, improvement and assistance measures specified in this RAP. **Detailed support measures are listed in Section 12.3.1.** 3) Community Development Initiatives: The SPV will develop and implement a Community Development Plan, which will supplement the support provided to vulnerable households under the RAP.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
more significant level due to vulnerability or disadvantaged conditions.	Physically displaced households with vulnerable members (under any vulnerability category)			The SPV, through CLOs and other in-house personnel as appropriate, will provide support to reregistration processes for residency, education (for students), health care (at the family health centres), utilities (at the utility companies). This will include logistical support, support for preparation of required documentation, etc. One member of the physically displaced households having vulnerabilities, who is looking for a job and meets Project's employment criteria (e.g. education, skills, H&S considerations, etc.) will be given priority in Project employment during construction phase. The households will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8.
	<u>Economic:</u> Green card[95] holder People receiving governmental aid Unemployed Employed without Social Security			One member of the physically or economically displaced households having vulnerabilities, who is looking for a job and meets Project's employment criteria (e.g. education, skills, H&S considerations, etc.) will be given priority in Project employment during construction phase. The households will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8.
	<u>Gender-based:</u> Female head of HH without an economically active adult man in the household Female head of HH with an economically active adult man in the household <u>Based on age:</u> Elderly people (over 65) in need of care Children household head (under 18) <u>Sickness, physical or mental disability:</u> Chronical disease Physical disability Mental disability <u>Households with children:</u> Children with special needs Unschooled children at school <u>Ethnic minority, belonging to other religions</u>			1)The SPV will ensure through individual communication and other tailored mechanisms (e.g. women only meetings) that women and vulnerable groups have equal access to the RAP related consultations and Project Grievance Mechanism. To this end, the SPV has hired 2 female CLOs and through female CLOs, the SPV will make efforts to maximise participation of women to negotiations and consultation meetings. Women and vulnerable owners/shareholders who live in affected settlements will be informed individually by the SPV and EPC CLOs about the timing of the negotiations meetings as per Law, expropriation decisions (e.g. court decisions in case of Article 27 or 10), deposition of compensations, etc. 2)Women members of households to be resettled will be engaged in resettlement process and should be part of the decision making process. 3)Entitlements to be provided through this RAP by the SPV will be issued to cover both female and male spouses within the households. Where requested/required, support will be provided by the SPV site teams to assist them in opening bank accounts. 4)Women and children visiting and supporting their farmer husbands as they work on the agricultural fields will be monitored and female CLOs will ensure ongoing engagement with them to identify any safety or gender issues that may be experienced by them during construction and/or operation. Corrective actions will be planned and implemented on a case by case basis should such issues are identified during monitoring. 5)Unemployed female members of the physically and/or economically displaced households will be provided priority in Project employment (during construction and operation phases depending on their qualifications and skills) should they are looking for employment. SPV and EPC CLOs will inform them about job opportunities that are relevant to their qualifications. 6)Training programmes to be developed and delivered by SPV's implementation partners will take into consideration potential alternative sustainable livelihood sources that may be considered for the female and other vulnerable members of the affected households (e.g. unemployed high school and university graduates within the affected households, female members who are willing to have an insured job). 7)Additional workload on women that may stem from physical and/or economic displacement or situations that may disproportionately impact the comfort of vulnerable members will be identified on case by case basis through fields surveys to be conducted with the attendance of female CLOs during RAP implementation. Measures/assistance tailored to the needs of households with vulnerable members and women will be provided by the SPV in consultation with them (e.g. support that may be provided to reduce the workload before, during and after relocation process through access to services that may be outsourced, special health support needed by households members with health-related vulnerabilities, etc.). 8)In case the vulnerable PAP owns non-residential structures affected by the Project (e.g. barns, sheds, etc.), the SPV will offer providing in-kind support and assistance for reconstruction of the affected structure at an available location to be indicated by the vulnerable PAP (noting that the vulnerable PAPs owning such structures with evidence will receive mandatory cash compensation from KGM as per Expropriation Law). 9)Support to be provided to vulnerable households and women as part of RAP will be completed through the **Community Development Plan** to be developed and implemented by the SPV.
	<u>Based on literacy:</u> Illiterate persons			The Company, through CLOs and other in-house personnel as appropriate, will assist illiterate, elderly and other persons in need in reviewing and processing official documents relevant to expropriation.
	<u>Migrant</u>			Migrant agricultural workers employed by the households affected from Project-related land acquisitions will be specially informed by the SPV, through CLOs and other in-house personnel as appropriate, about the Project land acquisition, RAP, and the grievance mechanism.
	Households who do not own any agricultural land			The households will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8. At least one member of the physically or economically displaced households having vulnerabilities, who is looking for a job and meets Project's employment criteria (e.g. education, skills, H&S considerations, etc.) will be given priority in Project employment during construction phase.
	<u>Cumulative impacts:</u> Households whose income is land based and disproportionately affected due to cumulative impacts on their lands.			PAPs whose livelihood is land based and who are disproportionately affected by the cumulative impacts will be supported through livelihood restoration programme. The RAP Budget includes provisions for the compensation of cumulative impacts. The users of the parcels subject to potential cumulative impacts will be further entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8.

[95] Health card provided as per the national Regulation on the State Coverage of Healthcare Expenses for Citizens Who Cannot Afford to Pay and the Green Card System (type and content of the card is determined as per the Regulation).

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
Vulnerable employees	Please see Table 12-4 for Number of Potentially Vulnerable Employees in Affected Businesses Businesses to be relocated: **9 vulnerable employees** (1 female + 8 male) Businesses that will not relocate but may experience partial loss of land and/assets: **7 vulnerable employees** (1 female + 6 male) Informal employees (Employees who are not registered at the workplace under the Social Insurance and Universal Health Insurance Law (No. 5510) of Turkey). Migrant employees (formal and informal) (**5 male migrant declared to be employed informally + 2 male migrants declared to be employed formally** in businesses to be relocated) Physically disabled / handicapped employee Chronically ill employee (1 male + 1 female in businesses to be relocated)) Elderly workers (over 65) in need of care Women employees with vulnerabilities (e.g. single women with children, etc.) Employees with vulnerable household members (e.g. disabled) No children (15-18 ages) were reported to be employed at the affected businesses		No additional compensation is required for vulnerable groups under the Expropriation Law.	**Special support and/or assistance to vulnerable employees (on a case-by-case basis):** Special measures/assistance to be provided to vulnerable employees and employees who have vulnerable members in their households will be identified by the SPV and assistance/measures will be developed and delivered by the SPV on a case-by-case basis. Vulnerable workers will be supported through the RAP regardless of the formality of their employment conditions. The SPV (through their legal department) will advise migrant workers who do not have valid work or residence permits on procedures required to be followed for formalisation of their residence and employment in Türkiye. **Vulnerable employees including informal, migrant, women, etc. will be eligible to access all entitlements described (above) for Affected Businesses – Employees:** - "Temporary Income Loss by Employees" due to being sent by the business owner to unpaid leave during business interruption period or delayed salary payment during business interruption period - "Permanent Income Loss by the Employees" due to permanent business shut-down by business owners, dismissal/ termination of employment contract by business owners or resignation by employees as the business relocates to a remote location.
(vi) Temporary Losses/Impacts During Construction				
Temporary loss of private parcels during construction (including access restrictions)	Owners/ shareholders	Please see Section 2.3.9 for temporary facilities.	Temporary facility sites that will continue to serve the Project during the operation phase are expropriated by KGM in accordance with the Expropriation Law – for example, the Main Construction Camp Site at KM 64+500, which will serve as the O&M Centre during operation. For facilities to be used solely during the construction phase, KGM requires the SPV/EPC to complete land acquisition through rental agreements, mutual protocols, or similar arrangements with the owners or shareholders.	1)Cash Compensation at Full Replacement Value**:** Protocols and/or rental agreements will be executed by the SPV/EPC with the owners/right holders of the lands to be used temporarily during the construction phase. Cash compensation for the use of land and any economic activity (cost of crops, trees, non-residential structures, infrastructure etc. at market prices) will be provided by the SPV to owners/right holders accordingly. 2) Moving Assistance and/or Allowance: In case the non-residential structures are movable and if requested by the owners, the SPV will provide assistance for moving them to replacement land or another location to be decided by the PAP. 3) Construction-related Measures: The SPV will ensure that all construction and work sites temporarily used during the construction phase are rehabilitated upon completion of activities at each site, in accordance with the Project ESIA. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner. 4)Monitoring, Grievance Management and Corrective Measures: The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to temporary land loss and access restrictions arising from construction phase impacts.
	Formal users (formal tenants)	Formal users of temporary facility sites will be identified based on ongoing consultations with Mukhtars and communities as the final list of temporary facilities (incl. contractor and subcontractor) to be used will be decided by the SPV in agreement with KGM.	No compensation for **land** is provided to formal users for temporary land use by the Project. However, formal tenants are eligible for compensation for crops, trees and any assets and fixed improvements/ investments (structures) on the rented land on the condition that they can prove ownership for these crops/assets and fixed improvements/ investments. Depreciation is deducted in line with the depreciation ratios published in the relevant Turkish legislation.	PAPs are eligible for all entitlements defined for the formal users (formal tenants) **under** "Permanent loss of private parcels" **(please see above)**. The user will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner.
	Informal users	Informal users of temporary facility sites will be identified based on ongoing consultations with Mukhtars and communities as the final list of	No compensation for **land** is provided to informal users for temporary land use by the Project.	PAPs are eligible for all entitlements defined for the informal users (formal tenants) **under** "Permanent loss of private parcels" **(please see above).** The user will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8.

Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
		temporary facilities (incl. contractor and subcontractor) to be used will be decided by the SPV in agreement with KGM.	However, informal users are eligible for compensation for trees and structures (e.g. fixed improvements/investments) on the land they use informally as per Article 19 of the Expropriation Law on the condition that they can prove ownership for these trees and structures.	During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner.
Temporary loss of state-owned parcels during construction (including access restrictions)	Owners (Governmental institutions)	Please see Section 2.3.9 for temporary facilities.	Treasury lands and non-registered parcels are allocated to the Project upon KGM's application, without any payment. Cash compensation is provided by KGM to legal entities in accordance with established protocols, and the respective parcels are subsequently transferred to KGM.	-
	Formal users (formal tenants)		Land designated for temporary use is allocated without undergoing expropriation procedures.	PAPs are eligible for all entitlements defined for the formal users (formal tenants) **under** "Permanent loss of state-owned parcels" **(please see above).** The formal users will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the relevant institutions.
	Informal users		Land designated for temporary use is allocated without undergoing expropriation procedures.	PAPs are eligible for all entitlements defined for the informal users (formal tenants) **under** "Permanent loss of state-owned parcels" **(please see above).** The informal users will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the relevant institutions.
Non-land related impacts due to construction (e.g. dust, excavation, traffic, blasting, etc.) that may lead to impact on lands, livestock, other properties, crops, quality and quantity of surface or groundwater resources, etc.)	Owners and formal/informal users of lands and assets – as applicable	To be determined on a case-by-case basis Grievance registers are kept by the SPV and EPC CLO as part of grievance logs.	-	1)Construction-related Measures: - The SPV will ensure that construction-related environmental measures are implemented to avoid, minimise and/pr rectify impact on water resources, air emissions, vibration, etc. in line with the Project ESIA. - The SPV will commission baseline surveys of existing building structures and integrity at receptors close to the blasting sites should be undertaken so that impacts and any damage arising from blasting activities can be identified during the periodic monitoring. - The SPV will ensure that the construction and works sites temporarily used during construction are rehabilitated upon completion of construction activities at each site in line with the Project ESIA. 2)Monitoring, Grievance Management and Corrective Measures: - The SPV will ensure that any claims regarding property damage are investigated and assessed by third-party experts. Cash compensation will be provided to affected persons for all validated claims. Contractor and subcontractor liabilities will be clearly defined in their respective agreements. - The SPV will ensure that E&S impacts are monitored as outlined in the Project ESIA and will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase. 3)If livelihood loss is verified, all livelihood costs will be compensated by the EPC Contractor in line with this RAP requirements.
Temporary interruption/ disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any	To be determined on a case-by-case basis	-	1)Construction-related Measures - The SPV will ensure coordination with relevant authorities and institutions and will take all necessary on-site measures to minimise the duration and impact of temporary service interruptions or disturbances affecting beneficiaries. 2)Monitoring, Grievance Management and Corrective Measures - The SPV and EPC CLOs will inform service beneficiaries in advance about the schedule and nature of any interruptions and will update them on the Project Grievance Mechanism prior to the start of the interruption. - The SPV will ensure and monitor the immediate reinstatement of affected infrastructure and services upon completion of the relevant construction, displacement, or related works. - The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase. Any damage to services or infrastructure will be reinstated by the EPC Contractor.
(vii) Impacts During Operation				
Operation phase E&S impacts (e.g. operation phase noise, vibration, air quality, community health and safety)	Residential structures/houses that cannot be mitigated to levels compliant with Project standards through operation phase E&S management plans	To be determined during operation phase E&S monitoring, if any	-	1)Operation Phase E&S Measures in line with Project ESIA and subject-specific management plans and procedures 2)Monitoring, Grievance Management and Corrective Measures: Construction and operation phase impacts on these houses, including potential loss of property value, noise, vibration, and effects on household livelihoods, will be identified through periodic E&S monitoring and stakeholder consultations during the operation phase of the Project. These impacts will be managed through the Project's grievance mechanism.

(*) Major fixed investments/infrastructure include structures such as barns, sheds, depots, pools, immovable parts of the irrigation and drainage systems, etc., as depreciation of such structures are considerable.

8. Livelihood Restoration and Improvement

According to IFC PS5, "*the term "**livelihood**" refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering*".

IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) defines **livelihood restoration** as "*the process of restoring (or improving) affected persons' livelihoods to preproject levels (or better)".*

Within the context of the Project, livelihood restoration is required for the following categories of PAPs:

- **Users of agricultural land (formal and informal)**, including open-field and greenhouse cultivation. This includes physically displaced individuals, where land used for income generation is lost or access is restricted. The users may include owners, shareholders, formal tenants, sharecroppers or informal users of affected private or public lands.
- **Business owners and employees (formal and informal)** who experience loss of income or employment as a result of Project' impacts.

To support the planning of livelihood restoration, improvement, and assistance measures, consultations were conducted with the following stakeholders:

- **District Directorates of Agriculture and Forestry** in Serik, Manavgat, and Alanya districts (consulted in April 2025)
- **Mukhtars** of affected settlements, as part of the RAP surveys (consulted in April and May 2025)
- **Agricultural land users** in affected settlements, including open-field farmers and greenhouse operators – both formal and informal users of private and public lands including **vulnerable** farmers and households with vulnerable members (consulted in April and May 2025)
- **Greenhouse Investors and Producers Association (Sera-Bir),** consulted on the greenhouse establishment process, associated costs, and the feasibility of alternative income generation and livelihood support projects (e.g. the viability of soilless agriculture in the region)
- **Owners of affected businesses (employers)** in the affected settlements

According to IFC PS5 (paragraph 18, footnote 20), "*Where a project results in both physical and economic displacement, the requirements of paragraphs 25 and 26 (Economic Displacement) should be incorporated into the Resettlement Action Plan or Framework (i.e., there is no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan)*".

In line with this guidance, the **livelihood restoration, improvement, and assistance measures addressing the economic displacement impacts of the Project have been developed and incorporated into the RAP under this Chapter.**

As the RAP Implementation progresses, consultations of the SPV with the affected people and businesses (business owners and formal/informal employees) will continue an ongoing basis and livelihood restoration and improvement measures will be updated as required with input from ongoing consultations, external Agricultural and Business Consultants and related authorities and third parties (e.g. universities, professional organisations, etc.) to be collaborated as necessary.

8.1. Affected Lands (including Open-field and Greenhouses)

Detailed entitlements for landowners, as well as formal and informal users of affected lands, have been previously presented in Section 7.3.

The livelihood restoration, improvement, and assistance measures to be provided to agricultural users of affected parcels (open-field and under cover in greenhouses) are summarised in Figure 8-1.

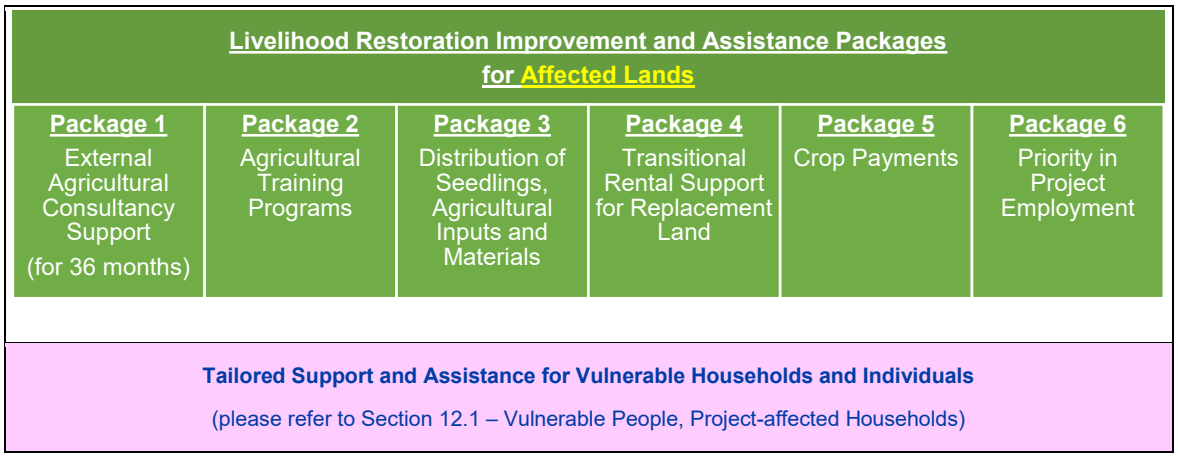


Figure 8-1. Summary of Livelihood Restoration, Improvement and Assistance Packages for Affected Lands

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 this RAP. These measures will be provided in proportion to the level of impact experienced (refer to Section 7.3 for the Entitlements Matrix). (please see Section 7.3 for the Entitlements Matrix).

Key RAP Field Survey Findings Informing Livelihood Restoration and Improvement Design for Affected Lands (including Greenhouses)

Extensive stakeholder consultations conducted during RAP preparation revealed that affected communities – particularly those at risk of losing agricultural land – are concerned about the potential challenges they may face in sustaining their livelihoods. The key RAP field survey (May 2025) findings informing the design of the livelihood restoration and improvement measures are summarised below:

- Many individuals who rely on olive or pomegranate orchards for income expressed their desire to re-establish comparable sources of livelihood through alternative means. **Commonly suggested alternatives include greenhouse cultivation** (e.g., tomatoes, vegetables, or tropical fruits) or establishing new orchards, with an emphasis on preserving productivity levels. There is a strong demand for support in the form of certified or licensed seedlings, which have become increasingly expensive and inaccessible without external assistance.

- Agricultural adaptation patterns within the affected communities reveal a strong tendency to follow prevailing models. For example, where tomato greenhouse cultivation is widespread and proven successful, others are inclined to follow suit. This highlights the importance of designing livelihood restoration interventions that are sensitive to local agricultural trends and peer influence. While older individuals are generally more resistant to change and prefer to restore their previous activities, younger individuals demonstrate greater willingness to adapt, learn, and explore new options, including alternative crops or modern greenhouse techniques.

- Although limited in number, a few respondents – typically those with higher education or socioeconomic standing – expressed interest in modern, technologically advanced agricultural methods, such as greenhouses, in certain cases powered by solar panels, or the cultivation of tropical fruits. However, overall awareness of such innovative options remains low, suggesting a need for targeted outreach and capacity-building to diversify livelihood options and build resilience. Despite this, formal demand for training remains limited. Most elderly participants did not consider training relevant or necessary, and in many cases, were unfamiliar with the concept altogether. In contrast, younger participants (such as the younger community members in Evrenleryahşi) did express interest in training opportunities focused on greenhouse production.

- Consultations with affected individuals revealed that **livelihood preferences vary significantly across age groups**, which has direct implications for the design of livelihood restoration strategies. Younger community members showed interest in greenhouse farming and expressed willingness to participate in related support programs. However, **greenhouse cultivation was widely considered too labor-intensive for older individuals**, particularly those aged 50 and above.

  Among the elderly, **olive cultivation** was consistently mentioned as a preferred activity. While olive trees take several years (typically 6 years, after which the trees are assumed to start yielding) to begin producing economically viable yields, they require relatively **low ongoing maintenance**, making them a suitable option for older land users. It was commonly noted that older farmers prefer tasks that allow them to maintain a connection to land and agriculture without extensive physical labor, often relying on occasional support from younger family members or seasonal labor for harvesting.

  This distinction underscores the importance of **designing age-appropriate livelihood restoration options**. For example, while greenhouse investments may be better suited to younger farmers, the promotion of low-maintenance orchards (e.g., olive) could serve as viable alternatives for elderly land users.

  In this context, **training programs should not be designed based solely on stated demand**, but rather on an **assessment of local agricultural challenges and potential**. Once appropriate topics are identified, practical, demonstration-based training sessions are to be offered in collaboration with local farmers. Participants may not proactively request such opportunities, but when offered clearly and accessibly, interest and attendance are likely to increase – particularly if accompanied by **peer demonstrations or field-based examples**.

- Some of the affected farmers have raised concerns that, although their land is not directly impacted by the Project, its proximity to construction zones may result in secondary effects – such as pest outbreaks (e.g. red spider mites). While a direct causal link between construction dust and pest infestations cannot be conclusively established without scientific evidence, this concern underscores the importance of adopting preventative measures. In particular, the promotion of biological pest control methods – such as the introduction of beneficial predatory mites – could offer an effective solution. Training farmers in these techniques during the construction phase through applied, field-based training modules and distributing relevant agricultural inputs and materials as a transitional support is considered to help mitigate potential impacts. It should be noted that the elderly participants may not engage through formal classroom formats but may respond well to hands-on, demonstration-driven learning involving visual learning and peer exchange opportunities.

- As part of the RAP surveys conducted in May 2025, the following types of support were most frequently requested by the households interviewed:

  - Training in greenhouse cultivation and assistance for greenhouse setup
  - Support for alternative crop cultivation, particularly for greenhouse-grown crops such as vegetables and tropical fruits – especially bananas.
  - Seedling support
  - Assistance in finding replacement agricultural land

- The following agricultural preferences and transition strategies were also commonly expressed by households during the RAP surveys (May 2025), reflecting their priorities for increasing agricultural income, and reducing both labour demands and production costs:
    - Transitioning from olive cultivation to greenhouse farming – particularly banana cultivation – as it is considered a less labor-intensive activity by some farmers and agricultural consultants.
    - Transitioning from open-field farming to greenhouse farming (especially for banana and other tropical fruits) to reduce exposure to climate-related risks.
    - Expanding the number of greenhouses to increase productivity and income stability.
    - Engaging in tropical fruit cultivation (avocado, mango, dragon fruit among others), especially in areas with suitable climatic conditions (e.g., Manavgat and Alanya).
    - Expanding and/or modernising existing agricultural activities.
- Though not commonly expressed, the following were also mentioned among the investment plans of the interviewed household:
    - Diversifying income through **non-agricultural activities**, mainly in livestock, eco-tourism and agritourism initiatives and construction.
    - Expansion or modernization of animal husbandry operations, enlarging or upgrading feedlots, undertaking technological investments in livestock business and transitioning to mechanised or automated systems.
    - Installing solar power panels to reduce energy costs for greenhouse operations.
    - Transitioning to transportation and service sector expansion – notably in shuttle or service operations.

Accordingly, taking into account the most commonly expressed requests and preferences of PAPs, along with a preliminary assessment of technical and economic feasibility and their relevance, the following LRP packages have been developed as part of the RAP. These packages should be considered as a framework for potential livelihood restoration projects and indicative budgeting for their implementation. The projects may be diversified within the limits of the RAP budget (including LRP component) based on evolving PAP needs and preferences, with the objective of implementing the most feasible and impactful initiatives that deliver maximum benefit to affected households.

To this end, the SPV – RAP Implementation Team, with support from an external Agricultural Consultancy Company to be appointed as SPV's implementation partner following the signing of the Finance Agreement, will conduct a final assessment of needs and opportunities in the affected settlements. Based on this assessment, the LRP projects will be finalized for implementation by the SPV. This process will be completed within one year of the Finance Agreement signing. During this stage, additional packages may also be developed, taking into account the alternative investment plans expressed by households, as discussed above.

Package 1 – External Agricultural Consultancy Support

The content of the support package on external Agricultural Consultancy Support to be offered to agricultural land users is summarised in Table 8-1.

Table 8-1. Package 1: External Agricultural Consultancy Support

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Support	External Agricultural Consultancy Support to interested affected households
Type of Support	Household-level
Description of the Package	The SPV will contract an external Agricultural Consultancy Company as its third-party implementation partner. The implementation partner's team will consist of experts specialised in the design and implementation of livelihood restoration measures. Through this company, agricultural consultancy support will be provided to agricultural land users for the development and implementation of specific livelihood restoration and improvement projects, in consultation with affected people, as well as relevant governmental and non-governmental institutions. The consultancy services will be provided over a period of 36 months, covering the entire duration of the RAP implementation. The main consultancy and advisory services to be delivered by the agricultural consultancy company will include, but are not limited to, the following: 1)Final Assessment on Needs and Opportunities 1a) As part of the RAP preparation process, consultations were held with affected communities and households to assess their needs and identify feasible livelihood restoration opportunities. These consultations will be further reviewed and refined in collaboration with PAPs and relevant stakeholders to ensure that the livelihood restoration and improvement measures are tailored to local conditions and preferences. 1b) The Agricultural Consultancy Company, in coordination with PAPs, District Directorates of Agriculture, and other relevant stakeholders, will evaluate alternative crop types and agricultural production activities that offer higher yield potential and improved income prospects. Based on RAP surveys with PAPs and consultations with the District Directorates of Agriculture and Forestry in Serik, Manavgat and Alanya, the following tropical and high-value fruits are among the alternatives identified for further assessment by the Agricultural Consultancy Company: - Banana - Avocado - Mango - Dragon fruit - Strawberry **The final selection of crop types to be supported under the livelihood restoration and improvement program will be done by the external Agricultural Consultancy Company during the early phases of RAP implementation**, based on the agronomic suitability, local capability, market potential, and alignment with local preferences. Water requirements and availability will be among the key considerations in the evaluation process. 2)Development and Delivery of Agricultural Training Programs The external Agricultural Consultancy Company will develop and deliver agricultural training programs, as detailed below under **Package 2**. 3)Provide Consultancy Support for Site Implementation of Measures The external Agricultural Consultancy Company will plan and provide guidance for the distribution of agricultural inputs, materials, and other forms of support to affected agricultural users, as detailed below under **Package 3**. The SPV will ensure the distribution of agricultural inputs and materials under their guidance and oversight. The budget and details on material distribution to households, is presented in Chapter 16
Number of Households	All households (landowner, formal and informal user) affected by economic displacement are eligible to participate in training programs depending on their agricultural activities.
Implementation Timeline	The external Agricultural Consultancy Company will be contracted by the SPV within **one month** following the signing of the Finance Agreement and will provide continuous support and services throughout the RAP implementation period (36 months). The selection process for the Agricultural Consultancy Company will be initiated **during the ESIA disclosure period** to ensure timely mobilisation and alignment with RAP implementation timelines.
Budget	Please refer to **Chapter 16 – Budget.**

Assessment of Alternative Crops

Alternative agricultural activities that could be recommended as income-enhancing measures for farmers affected by expropriation in the region has been assessed[96] by the RAP Consultant Teams' Senior Expropriation and Valuation Expert (Agricultural Economist and Certified Real Estate Valuation Expert) as part of the RAP.

The Project area is located in one of the most agriculturally diverse regions of Türkiye. As such, a **wide range of crop species** are already being cultivated in practice. Moreover, the cultivation of **tropical fruits** has been present in the region for approximately the past ten years.

Agricultural income–expenditure tables obtained from the District Directorates of Agriculture and Forestry in Serik, Manavgat, and Alanya indicate that the **highest net income** is generally achieved through **greenhouse vegetable production**. Notably, in most cases, greenhouse vegetable cultivation generates higher net returns than even some tropical fruits – with the exception of dragon fruit in Alanya, as summarised in Table 8-2.

Table 8-2. Top 10 Crops with the Highest Net Income According to the Income–Expenditure Tables of the District Directorates of Agriculture and Forestry

No.	Highest Net Incomes by Crop Type (TL/da)		
	Serik	Manavgat	Alanya
1	132,386.70 – Pepper (Kapya), greenhouse	139,745.20 – Pepper (Hot/Sivri), greenhouse	164,324.90 – Dragon fruit, greenhouse
2	129,995.20 – Pepper (Stuffed type), greenhouse	127,607.67 – Tomato, greenhouse	163,575.89 – Cucumber, greenhouse
3	127,226.50 – Tomato, greenhouse	122,533.92 – Cucumber, greenhouse	137,267.36 – Eggplant, greenhouse
4	125,193.60 – Pepper (Hot/Sivri), greenhouse	113,298.86 – Dragon fruit, greenhouse	135,712.34 – Pepper (Kapya), greenhouse
5	89,837.50 – Eggplant, greenhouse	102,210.26 – Banana, greenhouse	123,373.10 – Avocado, open-field
6	70,540.80 – Strawberry, greenhouse	91,429.90 – Avocado, open-field	94,310.49 – Strawberry, greenhouse
7	43,414.60 – Melon, greenhouse	69,558.03 – Watermelon, greenhouse	93,504.55 – Pepper (Stuffed type), greenhouse
8	38,809.40 – Cherry	63,727.63 – Eggplant, greenhouse	92,078.81 – Tomato, greenhouse
9	37,196.00 – Watermelon, greenhouse	49,460.97 – Zucchini (Sakız type), greenhouse	83,340.59 – Zucchini (Sakız type), greenhouse
10	27,564.40 – Watermelon, open-field	44,998.62 – Walnut	71,967.32 – Banana, greenhouse

Source: Serik District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (unpublished), Antalya; Manavgat District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (unpublished), Antalya; Alanya District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (unpublished), Antalya.

No data on the **tropical fruit mango** was found in the records of the District Directorates of Agriculture and Forestry. As mango cultivation is relatively new compared to other tropical fruits in the region, an assessment was conducted to determine whether it could be a viable alternative for local farmers. Interviews were held with individuals currently cultivating mango, and data were collected on the economic aspects of its production. For this purpose, a local farmer from Incekum, Alanya, who has been cultivating mango under greenhouse conditions for four years, was interviewed. In addition to mango, the farmer also produces bananas and olives and expressed a strong interest in tropical fruit cultivation. Based on the information provided, it has been concluded that challenges related to the adaptation of imported mango saplings to local conditions have not yet been fully overcome, and mango does not currently appear to be a viable income-generating alternative crop for the region.

[96] This was done by the Senior Valuation and Expropriation Valuation Expert of the RAP Consultant Team, who is an Agricultural Economist and Certified Real Estate Valuation Expert.

Package 2 – Agricultural Training Programs

The content of the support package on **agricultural training programs** is summarised in Table 8-1.

Table 8-3. Package 2: Agricultural Training Programs

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Support	Development and delivery of agricultural training programs
Type of Support	Household-level
Description of the Package	Agricultural training programs will be developed and delivered by the external Agricultural Consultancy Company and qualified trainers to be retained by them. The recipients of the training programs will be the formal and informal agricultural users affected by Project's land acquisition. The SPV, with support from the Agricultural Consultancy Company, will collaborate with the Antalya Provincial Directorate of Agriculture and Forestry and District Directorates in Serik, Manavgat and Alanya for designating the training subjects and the organization of the training sessions in each district. On the other hand, organization of the trainings will be undertaken by the SPV, covering the costs of transporting both the trainers and participating landowners/users, as well as travel allowances and other related expenses for the training staff. It should be noted that young and middle-aged farmers are more open to training, whereas elderly farmers tend to show little interest. This is largely because elderly farmers are reluctant to change their current practices and are generally hesitant to adopt new crop types or techniques – for example, operating vegetable greenhouses is considered challenging for them (GEM, May 2025. RAP Surveys). The interested PAPs will be identified by the SPV, with support from the Agricultural Consultancy Company, prior to the delivery of the trainings. The training programs will be organized separately in each district, as needs and preferences vary across districts – for example, the cultivation of tropical fruits is primarily relevant to Manavgat and Alanya. The SPV, through the external agricultural consultancy company and the trainers to be retained by them, will deliver an agricultural training program to the affected people. Based on RAP surveys with PAPs and consultations with the District Directorates of Agriculture and Forestry in Serik, Manavgat, and Alanya, the following topics have been identified as potential training subjects. These are areas in which mostly young and middle-aged farmers have expressed interest in receiving training: - Greenhouse cultivation (particularly banana) - Pruning ("*Budama*") Training for Citrus Orchard Owners - Biological Pest Control Programs (such as use of beneficial mites – *Phytoseiulus persimilis)* - Practical training on tropical fruit cultivation - Practical training on fertiliser and pesticide application techniques and cost-reduction strategies - Availability of and access to higher quality seeds/species for existing crops to improve productivity of existing agricultural practices - Improving access to markets and sales strategies
Eligibility	All households (landowner, formal and informal user) affected by economic displacement are eligible to participate in training programs depending on their agricultural activities.
Implementation Timeline	36 months (throughout the construction phase, commencing from the date of signing the finance agreement)
Budget	Please refer to **Chapter 16 – Budget.**

Package 3 – Distribution of Seedlings, Agricultural Inputs and Materials

The content of the support package on **distribution of seedlings, agricultural inputs and materials** is summarised in Table 8-4.

Table 8-4. Package 3: Distribution of Seedlings, Agricultural Inputs and Materials

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Household-level Support for Agricultural Support**
Level of Support	Household-level
Eligibility	All households affected by economic displacement are eligible to participate in training programs depending on their agricultural activities.
Description of the Package	The SPV will ensure the distribution of seedlings, and agricultural inputs and materials to affected agricultural users, under the guidance and oversight of the external Agricultural Consultancy Company. The costs associated with these inputs and materials will be covered by the SPV from the RAP Fund. The consultancy support required for the implementation of this package is detailed in Table As part of the Final Assessment on Needs and Opportunities to be undertaken by the external Agricultural Consultancy Company, the needs of the affected households will be determined and seedlings, agricultural inputs and materials to be distributed to each affected household will be determined in consultation with the PAPs, and as appropriate with the District Directorates of Agriculture and Forestry in Serik, Manavgat and Alanya. 1)Seedling distribution: One-off seedling support will be provided to PAPs for their lost trees, both in open fields (including orchards) and in greenhouses. The seedlings will be provided in proportion to the area lost to expropriation. Depending on the characteristics of their remaining land and other ongoing agricultural activities outside the expropriated area, PAPs will be offered the following options or similar alternatives to be agreed upon. - Tomato seedling distribution - Seedling distribution for open-field orchards (citrus, avocado, pomegranate, olive, apricot - Seedling distribution for commercial orchards in greenhouses (banana and dragon fruit) The feasibility of distributing certified seedlings will be evaluated by the external Agricultural Consultancy Company, taking into account the budget allocated for LRP activities. Based on the preferences of the PAPs and the feasibility assessment conducted by the consultancy, certified seedlings may be distributed, provided this remains within the budgetary limits allocated to each household in proportion to their level of impact. 2)Distribution of biological pest control agents PAPs who participate in the agricultural training sessions on biological pest control will be provided with the relevant agents following the completion of the training (one-off support). The specific agents to be distributed will be determined by the external Agricultural Consultancy Company as part of its final assessment of needs and opportunities. This determination will be made in consultation with the PAPs and the District Directorates of Agriculture and Forestry in Serik, Manavgat, and Alanya.
Implementation Timeline	**Year 1 after Finance Agreement signing** – Final assessment of needs and opportunities by the external Agricultural Consultancy Company, planning and distribution of seedling and materials. **Year 2 and 3 after Finance Agreement signing** – Monitoring and evaluation of the effectiveness and success of livelihood restoration, improvement, and assistance measures, as well as the planning and implementation of corrective actions, will be carried out as needed.
Budget	Please refer to **Chapter 16 – Budget.**

Seedling Cost Estimation for Vegetable Greenhouse

In the Antalya region, **tomatoes** are the most commonly cultivated vegetable in greenhouse farming. Field studies have confirmed that the same applies to the greenhouses located along the Project route. Therefore, for the purpose of calculating the one-time seedling cost under the LRP, **tomato seedlings** were taken as the reference due to their widespread cultivation.

As of 2025,

- The cost of one tomato seedling has been determined as **10 TL**.
- Approximately **3,000 seedlings are planted per decare** (1,000 m²) of greenhouse area in the region (based on stakeholder interviews conducted during the field study)
- Seedling cost of expropriated greenhouse area is calculated as **30,000 TL per decare** (i.e., 3,000 seedlings × 10 TL each), which corresponds to 30 TL per square meter.
- Total greenhouse area (including banana and dragon fruit[97]) within the expropriation boundary across amounts to 925 da. The total vegetable greenhouse area is **815 da.**
- Total seedling compensation for this area is calculated as: **815 m² × 30,000 TL/da = 24,450,000 TL** (based on one-time seedling cost of 30 TL/m²)

Commercial Orchards Seedling Cost Estimation

Plantations established with a single fruit species over an area of at least 1,000 m², considering specific row spacing and plant spacing (planting density), are referred to as **commercial orchards**. For landowners or users whose commercial orchards are subject to expropriation along the Project route, cost of seedlings for the relevant fruit species will be provided as a **one-time** livelihood support. The aim is to ensure the sustainability of the production activities of the farmers affected by the Project.

Accordingly, the number of expropriated trees of the relevant fruit type was taken into account for plots identified as commercial orchards in the field identification surveys of the valuation contractor (national engineering firm). On the other hand, even in cases where the term “commercial orchard” was not explicitly noted during the field identification surveys, it was observed that some co-owners in large, jointly owned parcels had established single-species commercial orchards on the portions allocated to them (based on internal arrangements). In some instances, two different commercial orchards were found on the same parcel.

The number of trees per decare varies depending on the type of fruit. A commercial orchard is defined as an area of one decare or more. Accordingly, for example, the threshold can be considered as **40 or more trees per decare for citrus orchards**, and **27 or more trees per decare for olive orchards**. Therefore, an assessment was made based on the number of expropriated fruit trees, and in cases where a high number of trees of the same type[98] are to be expropriated, they have been considered in the seedling compensation calculations done for the commercial orchards in that parcel.

The underlying rationale for commercial orchards ©s that the owner has established the orchard with the ©ntention of generating income. In contrast, planting a variety of fruit trees around a residence is typically intended for household consumption rather than commercial purposes. Thus, when calculating the seedling compensation, **fruit trees planted for household needs were excluded**, and the objective was to support the re-establishment of the commercial orchard that was created for income generation.

The fruit types identified as commercial orchards along the Project route with their unit prices (2025), planting densities and seedling cost per decare are presented in Table 8-5.

[97] The total area occupied by 27 banana greenhouses and 3 dragon fruit greenhouses was measured as 110,517 m².
[98] The number of trees per decare varies depending on the type of fruit. A commercial orchard is defined as an area of one decare or more. Accordingly, for example, the threshold can be considered as 40 or more trees per decare for citrus orchards, and 27 or more trees per decare for olive orchards.

Table 8-5. Unit Prices for Seedlings for 2025[99]

Seedling Type	Unit Price per Tree	Fruit Tree Planting Densities[100] per Decare	Seedling Cost per Decare
Grape (vineyard)	100 TL	240 trees	26,400 TL
Citrus (mainly oranges)	210 TL	40 trees	8,400 TL
Pomegranate	70 TL	83 trees	5,810 TL
Apricot	100 TL	40 trees	4,000 TL
Olive	210 TL	27 trees	5,670 TL
Banana (under cover)	140 TL	180 trees	25,200 TL
Avocado (open field)	380 TL	28 trees	10,640 TL
Dragon fruit (under cover)	130 TL	1,000 trees	130,000 TL

However, due to the prevalence of jointly owned parcels and the fact that only a portion of a parcel may qualify as a commercial orchard, it is more accurate to **base the calculation on the number of expropriated fruit trees of the relevant type rather than on land area**.

- Open-field Orchards: Based on field identification surveys and measurements, 213 parcels containing open-field commercial orchards has been identified in the expropriation plans (see Appendix H). The number of fruit trees within the expropriation boundaries and the associated seedling costs were calculated by the Senior Valuation and Expropriation Valuation Expert of the RAP Consultant Team (Agricultural Economist and Certified Real Estate Valuation Expert).

  The total seedling compensation for the trees to be expropriated in these **213 open-field commercial orchard parcels** was calculated as **7,844,150.00 TL.**

- Orchards under Cover (in Greenhouses): The two types of covered commercial orchards were taken into consideration: **banana** and **dragon fruit** (pitaya).

  Since the valuation contractor did not count the number of trees in the banana and dragon fruit greenhouses, the number of trees affected by expropriation was estimated based on the average planting density per decare.

  The total greenhouse area for 27 banana and 3 dragon fruit parcels affected by expropriation was measured as approximately **110 da** (see Annex-2). Based on average planting densities – **180** trees per decare for **banana** and **1,000** trees per decare for **dragon fruit –** the potential number of affected trees was estimated.

  When multiplied by the respective seedling prices, the total seedling compensation for covered commercial orchards was calculated as **3,496,130.00 TL.**

  An important consideration here is the correct identification of rightful owners in both **public** (Treasury-owned) and **jointly owned** parcels containing commercial open-field or greenhouse orchards.

[99] *Fruit seedling prices*, 2025. https://fidandeposu.com/kategorikonu-listesi.xhtml (Accessed: 18 May 2025); *Fruit seedling prices*, 2025. https://yagmurbotanikizmir.net/urun-kategori/nadir-bitkiler/ (Accessed: 18 May 2025)
[100] This information is based on consultations with the District Agriculture Directorates and producers.

Package 4 – Transitional Rental Support for Replacement Land

The content of the support package on **distribution of seedlings, agricultural inputs and materials** is summarised in Table 8-6.

Table 8-6. Package 2: One-year Rental Support for Replacement Land to be rented

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Level of Support	Household-level
Description of the Package	To support PAPs who do not own the land they use for agriculture, the SPV will provide compensation or support equivalent to the **one-year rental cost** of the lost agricultural land. This support aims to facilitate access to replacement agricultural land for rental purposes. In addition, the SPV will assist PAPs in coordinating with relevant authorities and institutions to identify and access comparable rental land. Where feasible, this may involve the continuation of the rental agreement with the previous landlord for an alternative agricultural parcel, preferably one offering improved quality and greater tenure security. The rental allowance will be determined based on the maximum market rental rates specified in the national Farmer Registration System for the applicable year.
Eligibility	All renter households and informal land users affected by economic displacement, who find replacement land for formal lease, are eligible.
Timetable	Following the completion of Final Assessment of Needs and Opportunities by the external Agricultural Consultancy Company

As part of the LRP package, the affected land users will be proposed a one-year land lease fee to local landowners/users whose lands will be expropriated and who will consider renting an alternative land.

When calculating the lease fee, it is important to note that open-field and greenhouse lands have different rental values. During RAP field surveys (April and May 2025), it was observed that for crops such as banana and dragon fruit, vacant lands are leased for 11–15 years with upfront payments, particularly for greenhouse cultivation.

To identify the prevailing lease rates in the region, the RAP Consultant Team consulted local producers, technical staff from the District Directorates of Agriculture and Forestry, and other relevant stakeholders. As a result, the following information was gathered regarding land lease rates:

- For open-field vegetable cultivation areas, lease rates vary between 3,000 TL/da and 5,000 TL/da. Accordingly, for expropriated open-field parcels along the route where agricultural production will continue, a lease fee of 4,000 TL/da/year (equivalent to 4 TL/m²/year) is considered appropriate.
- For nylon greenhouses, lease rates range from 40,000 TL to 70,000 TL per decare. Thus, a lease rate of 50,000 TL/da/year (equivalent to 50 TL/m²/year) is considered suitable for greenhouse areas.

Due to widespread land occupation (particularly on parcels belonging to the Treasury) along the route, land lease costs were calculated for all non-greenhouse areas, including:

- Privately owned open-field vegetable plots,
- Open-field fruit orchards,
- Areas occupied and cultivated by unauthorised users.

Rental support calculated for the greenhouses and Open-field Agriculture

Table 8-7. Rental Support Calculated for Greenhouses and Open-field Agriculture

Category	PAP	Total Area (m^2)	Unit Rental Fee (TL/m^2)	Calculated Rent (TL)
Rental support for greenhouses	Informal users on treasury and forest land	70.293	50	3.514.650
	Renters on private lands	42.746	50	2.137.300
Rental support for open-field agriculture	Informal users on treasury and forest land	5.422.122	4	21.688.488
	Renters on private lands	346.118	4	1.384.472
Total				**28.724.910**

Package 5 – Crop Payments

Regardless of whether an agreement is reached or not, if land entry occurs before harvest, the crop value is due. However, in practice, the KGM often refrains from paying additional crop compensation once the owner/user has received the expropriation compensation. Therefore, if land entry occurs before harvest, crop payments will be done by the SPV from the RAP Fund. This will be an integral part of RAP implementation, rather than a livelihood restoration measure, as it directly addresses and compensates for the actual impact.

Table 8-8. Cash Compensation for Crops

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Cash compensation for crops**
Level of Support	Household-level
Number of Households	The SPV aims to avoid entering any land with standing crops by aligning the construction schedule accordingly. Nevertheless, crop compensation may become necessary depending on Project-specific circumstances. At this stage, it is not possible to estimate the number of households that may be affected. On the other hand, a provisional budget line for crop compensation has been included under the RAP Fund based on the assumption that compensation for crops would be paid for maximum 5% of the total expropriated area (a similar proportion to previous BOT motorway projects) (please see Chapter 16).
Description of the Package	The SPV will provide cash compensation for crops in case of land entry earlier than the harvesting period.
Implementation Timeline	As of June 2025, there has been no land entry by the Project on lands with standing crops. This measure will be implemented in the event of land entry by the Project onto lands with standing crops.
Budget	Please refer to **Chapter 16 – Budget.**

Under normal circumstances, when calculating crop compensation, the developmental stage of the crop must be taken into account. For crops still in their early growth phase and not yet economically viable (e.g. immature annual crops or fruit/non-fruit trees still in the establishment stage), compensation must be calculated based on both the investment made and the income foregone. In such cases, production costs form the basis of the valuation.

During this stage, the cost analysis must include both actual expenses (e.g. tillage, sowing, fertilisation, pesticide application, irrigation, harvesting, and marketing) and calculated costs (e.g. land rent, interest, and general administrative expenses). Accordingly, the total of all expenses incurred up to the point of land entry, along with the calculated costs, will determine the total value of the crop.

However, for crops that have reached harvest maturity, the **net market value** must be calculated by subtracting the avoided costs (i.e. costs not incurred due to the expropriation) from the total market value of the main and by-products. Specifically, the compensation value of the crop must be derived from its gross production value minus the avoided expenses due to the entry onto the land.

If the land is entered precisely at harvest time, the crop value must be calculated and paid based on the net market value, as shown in the formulas below:

- Gross Product Value (GPV) (Main Crop) = Average Yield (kg/da) × Farmgate Price (TL/kg)
- GPV (By-product) = Average Yield (kg/da) × Farmgate Price (TL/kg)
- Total GPV = GPV (Main Crop) + GPV (By-product)
- Net Income Loss (Crop Compensation) = Total GPV – Avoided Costs

Due to the recent initiation of expropriation negotiations in this Project, if the EPC Contractor enters the land before the owner/user harvests their crops – even after reaching an agreement – crop compensation must be calculated and paid.

To this end, using 2024 data from relevant District Agriculture and Forestry Directorates (since 2025 figures are not yet available), crop compensation values per decare and per square meter were calculated for open-field vegetables, greenhouse vegetables, and commercial orchards[101].

Based on field observations and stakeholder interviews, the most common crop rotation and the most frequently cultivated crops were identified as follows, and average crop values were calculated accordingly:

- Open-field vegetable farming: Watermelon + eggplant
- Greenhouses: Tomato and pepper

Previous studies have shown that harvest costs typically account for 30% - 40% of total production costs in both open-field and greenhouse vegetable cultivation[102]. This study assumes harvest costs constitute 35% of total production expenses.

- Open-field vegetable cultivation:

  Based on the calculated crop values in **open-field vegetable cultivation**, estimated crop compensation amounts per decare of expropriated area in each district are as follows:

  - Serik district (watermelon + eggplant rotation): **51,797.45 TL/da**
  - Manavgat district: **47,753.31 TL/da**
  - Alanya district: **47,927.36 TL/da**
  - **Average: 49,159.37 TL/da**

[101] Manavgat District Directorate of Agriculture and Forestry, 2025. Agricultural Production Data (unpublished report), Antalya; Alanya City Council, 2025.Geographical Location. Accessed from: https://alanyakentkonseyi.org.tr/S/56/Cografi-Konu, access date: 18.05.2025; Alanya District Directorate of Agriculture, 2025. Agricultural Production Data (unpublished report), Antalya.

[102]Kıral, T., Kasnakoğlu, H., Tatlıdil, F.F., Fidan, H., and Gündoğmuş, E., 1999. Methodology for Cost Calculation of Agricultural Products and Database Guide, Agricultural Economics Research Institute, Publication No: 37, Ankara; Koral, A.İ., and Altun, A., 2000. Guide to Production Inputs of Agricultural Products Produced in Türkiye, Republic of Türkiye Prime Ministry General Directorate of Rural Services, Publication No: 104, Guide No: 16, Ankara; Ministry of Agriculture and Rural Affairs, Agricultural Economics Research Institute (AERI), Project Report No: 2001-14, Ankara. Input Use and Production Costs of Major Crops in Selected Regions of Türkiye.

- Greenhouses:

  According to the **tomato + pepper crop rotation in greenhouses**, the calculated crop values are as follows:

  - Serik district: **208,998.52 TL/da**
  - Manavgat district: **241,186.75 TL/da**
  - Alanya district: **145,130.64 TL/da**
  - **Average: 198,438.64 TL/da**

  The lower crop value in Alanya district compared to the other districts is due to the lower yield per decare and selling price for greenhouse-grown tomatoes and peppers.

- Commercial orchards:

  According to data from the Serik District Directorate of Agriculture and Forestry, crop values for **olives, citrus fruits, and pomegranates** were calculated as part of RAP.

  In Manavgat, crop values could be calculated for all types of **orchards with a single fruit species** (encountered along the route).

  In Alanya, however, no crop value was calculated for apricots due to lack of data. Significant differences in crop values for the same fruit are not expected. Indeed, the calculated values for the same fruit are found to be quite similar.

  In orchards with a single fruit species, the calculated crop values are given in Table 8-9. These values will remain valid until they are updated by the District Directorates of Agriculture and Forestry for the following year.

Table 8-9. Calculated Crop Values in Monoculture Orchards (TL/da)

Crop/Fruit	Crop Value per decare			
	Serik	Manavgat	Alanya	Average
Olives	28,388.11 TL	28,494.59 TL	39,258.98 TL	32,047.22 TL
Citrus fruits	32,903.87 TL	27,360.54 TL	29,306.78 TL	29,857.06 TL
Pomegranates	23,510.82 TL	25,777.96 TL	49,692.45 TL	32,993.74 TL
Apricots	-	30,270.60 TL	-	30,270.60 TL
Avocado	-	106,500.47 TL	135,905.59 TL	121,203.03 TL
Banana	-	172,676.75 TL	154,313.57 TL	163,495.16 TL
Grapes	-	41,696.31 TL	20,063.25 TL	30,879.78 TL
Dragon fruit	-	155,154.60 TL	197,638.72 TL	176,396.66 TL

*(*) By dividing the calculated crop values in the table by the average number of trees per decare for each fruit type, the crop value per tree can also be determined. Accordingly, in **Serik District**, the crop value per tree is calculated as 1,051 TL for olives, 823 TL for citrus fruits, and 283 TL for pomegranates. In **Manavgat District**, the values are 174 TL per vine for grapes, 1,055 TL per tree for olives, 684 TL for citrus fruits, 311 TL for pomegranates, 757 TL for apricots, 3,803 TL for open-field avocados, 959 TL for bananas, and 155 TL for dragon fruit. In **Alanya**, the values are 84 TL per vine for grapes, 1,454 TL per tree for olives, 733 TL for citrus fruits, 599 TL for pomegranates, 4,853 TL for open-field avocados, 857 TL for bananas, and 198 TL for dragon fruit.*

As a basis for estimating the potential crop compensation to be paid along the expropriation corridor, KGM's Head of the Division of Appraisal under the Department of Immovable was consulted in June 2025 to draw upon past experience in BOT motorway projects, particularly regarding the proportion of total expropriated land on which compensation for crops has historically been paid.

It was noted that, in previous BOT motorway projects, in accordance with the principles of the Expropriation Law, compensation for crops was typically paid on less than 5% of the total expropriated area. Based on this precedent, it has been assumed that a similar proportion may apply in the current corridor. Accordingly, calculations were carried out by considering 5% of the total expropriated area.

Calculations were conducted by the RAP Consultant Team's Senior Expropriation and Valuation Expert (Agricultural Economist) separately for open-field agricultural lands, greenhouses and orchards. Accordingly, the total estimated crop compensation for agricultural lands, greenhouses, and orchards affected along the corridor amounts to 30,985,252 TL.

Package 6 – Priority in Project Employment

Table 8-10. Priority in Project Employment

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Priority in Project-related employment during the construction phase will be given to farmers whose agricultural livelihoods are significantly impacted, vulnerable households, and business owners and employees who lose their income as a result of the Project development, if any.** – for example, those who lose more than 20% of their total productive agricultural area as a result of land acquisition
Level of Support	Household-level
Description of the Package	At least one member of the households with vulnerable members or households that experience significant impact on their agricultural business integrity due to loss of agricultural land through Project-related expropriation will be given priority in Project employment during construction phase should they meet Project's employment criteria (e.g. education, skills, H&S considerations, etc.). Unemployed female members of physically and/or economically displaced households who are actively seeking employment will be given priority for job opportunities within the Project – during both the construction and operation phases – subject to their qualifications and skills. There may be businesses that may shut-down operations or businesses that may relocate to relatively remote locations. The owners and/or employees of those businesses, should they lose their income sources due to Project-related factors, will be given priority for employment in the Project construction should they meet Project's employment criteria (e.g. education, skills, H&S considerations, etc.).
Number of Households	To be determined
Implementation Timetable	Throughout construction and as appropriate during operation
Budget	To be covered under the EPC Contractor's Project budget; no separate cost allocation is foreseen under the RAP Fund.

8.2. Affected Businesses – Business owners and Employees

For affected businesses, livelihood restoration and improvement measures will aim to prevent potential shutdowns or reductions in operational capacity, thereby minimizing negative impacts on both the businesses and their employees.

The livelihood restoration, improvement, and assistance measures to be provided to affected businesses (business owners and employees) are summarised in Figure 8-1.

Livelihood Restoration Improvement and Assistance Packages for Affected Businesses				
Package 1 External Business Consultancy Support for Relocation (for 36 months)	**Package 2** Pre-relocation Financial Support Package to Business Owners	**Package 3** Post-relocation Financial Support Package to Business Owners	**Package 5** Financial Support Package to Employees	**Package 6** Priority in Project Employment
Tailored Support and Assistance for Vulnerable Business Owners and Employees (please refer to Section 12.2 – Vulnerable People, Project-affected Businesses)				

Figure 8-2. Summary of Livelihood Restoration, Improvement and Assistance Packages for **Affected Businesses**

The livelihood restoration, improvement and assistance package to affected businesses and the measures included in the Entitlements Matrix (Section 7.3) will be complementary to each other. **Early consultation and timely notification in the land acquisition process** is particularly critical to ensuring that relocated businesses can sustain their economic activities at new premises. This requires a well-designed relocation process that provides both financial and organisational support. Accordingly, as outlined in the Entitlements Matrix, the SPV will notify the owners and tenants of affected businesses **at least three months in advance of the commencement of expropriation**, in alignment with the expropriation programme of KGM. This advance notice is intended to prevent forced evictions and to allow sufficient time for resettlement planning and preparation, enabling businesses to manage their relocation effectively.

Key RAP Field Survey Findings Informing Livelihood Restoration and Improvement Design for Affected Businesses

The key RAP field survey (May 2025) findings informing the design of the livelihood restoration and improvement measures are summarised below:

- Interviews with business owners (such as those operating in Evren) revealed a distinct set of livelihood restoration challenges. Several businesses had recently relocated, often incurring substantial debts in the process. A key concern raised was the widespread use of informal key (air) money (locally referred to as *"hava parası"*), involving unofficial payments. These informal costs are not reflected in official rental agreements, resulting in a significant gap between documented lease terms and the actual financial burden faced by business operators.

- As an illustrative case, in **Evren**, a respondent reported having paid a significant amount of informal key money ("air money") to secure a new business location. In addition to this informal payment, the respondent undertook substantial relocation-related investments, a large portion of which was allocated to costs relevant to stock inventory. Despite the high actual costs incurred, the officially declared annual rent for the premises was reported as approximately TRY 60,000 (a relatively low figure for rental in the current market conditions in Antalya). However, according to the respondent, market-based actual rental value is approximately 20 times higher than the official figure, highlighting a substantial discrepancy between recorded and actual economic exposure. This example illustrates the hidden financial burdens borne by displaced businesses, which may not be reflected in formal documentation.

  Consequently, the rental assistance provided through standard support mechanisms is widely perceived as insufficient. Affected business owners expressed a strong preference for the direct allocation of commercial premises, rather than receiving financial compensation.

  Many respondents stressed that any monetary compensation would rapidly lose value and become insufficient for meeting actual resettlement needs. In this context, beneficiaries often provided inflated compensation estimates – not due to opportunism, but due to genuine concern over their future purchasing power. This reinforces the demand for land-based or in-kind compensation options, wherever feasible.

- Further information on relocation challenges, foreseen expenses and relocation support needs expressed by the affected businesses is provided in Section 5.2.6.

Package 1: External Business Consultancy Support

The content of the support package on external Business Consultancy Support to be offered to affected businesses is summarised in Table 8-1.

It should be noted that the SPV may consider establishing an in-house Business Consultancy Team, composed of qualified experts with relevant experience and capacity, to ensure dedicated resources for the implementation of relocation-related activities, as necessary. If such a decision is made, the SPV will inform the Lenders and seek their approval to deliver the services outlined below through the in-house team. In this case, all tasks assigned to the external business consultant, as defined in this RAP, will fall under the responsibility of the in-house Business Consultancy Team and will be delivered by them.

Table 8-11. Package 1: External Business Consultancy Support

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	External Business Consultancy Support to affected businesses
Level of Support	Business-level
Number of Businesses	- 29 businesses to be relocated (see Table 3-21). - 8 businesses in Hacıobası located on Land already Expropriated by KGM for Existing State-roads (D-695)
Description of the Package	The SPV will retain an external Business Consultancy Company (hereinafter referred to as the Business Consultant), comprising a team of experts specialised in business development and management for micro, small, and medium-sized enterprises (MSMEs). The consultancy services will be provided over a period of 36 months, aligning with the duration of RAP implementation. The scope of services to be delivered by the Business Consultant is outlined as follows: 1)Provide Consultancy Support for Business Relocation Planning: The Business Consultancy Company will assess each affected business to identify its specific needs and key considerations related to relocation. Based on these assessments, tailored advisory services will be offered to affected business owners (formal or informal) to support the relocation process. This will include, but not be limited to: a) Evaluating the advantages and disadvantages of potential relocation sites in terms of long-term business sustainability; b) Advising on operational arrangements (e.g., shift organisation) to minimise business interruption; and c) Recommending practical measures to reduce potential losses in time and income during the relocation period. 2) Conduct Needs and Opportunities Analysis for Each Affected Business and Identify Actions for Livelihood Restoration and Improvement The Business Consultant will carry out a tailored assessment of each affected business to identify specific needs and actions for livelihood restoration and potential opportunities for development and growth, and provide business management consultancy support to implement identified actions. This analysis will be undertaken with input from external technical experts, as required, and will aim to provide a foundation for business-specific livelihood restoration and support strategies. The areas of assessment may include, but are not limited to, the following: a) **Financial opportunities** – such as access to available grants, loans, or other financial instruments, depending on the business type and sector; b) **Opportunities for enhanced integration with the tourism sector** – identifying ways to increase sales through linkages with tourism activities, services, or supply chains in Antalya region; c) **Job-specific training needs** – to enhance business efficiency, productivity, and profitability; d) **Certification and accreditation needs** – identifying relevant certification and accreditation requirements or opportunities, where applicable to the type of business, to support growth, credibility, and market access; e) **E-commerce potential** – particularly for businesses with capacity but lacking knowledge or experience in online sales; f) **Formalisation of informal workforce** where applicable to the business (e.g. through benefiting from existing state programmes supporting formalisation of employment)

Information	Livelihood Restoration, Improvement and/or Assistance Measure
	The Business Consultant will communicate the outcomes of the assessment to each affected business and engage in consultations to determine appropriate actions for livelihood restoration and improvement. In addition, the Consultant will provide ongoing support and guidance for the implementation of the identified actions. 3)Provide Consultancy Support during Implementation The Business Consultancy Company will deliver implementation support services for the above-listed activities and implementation of identified actions throughout the RAP implementation period. These consultancy and monitoring services will be included within the overall management fee of the Business Consultancy Company 4)Provide Consultancy Support during Implementation 5)Develop a Programme for General and Business-specific Trainings (based on Needs and Opportunities Analysis – with input from technical experts as required) g) Job-specific trainings that will vary for each business and tasks delivered by employees to enhance the employees in their existing professions and increase efficiency of business operations (to be developed based on needs and opportunities analysis, e.g. boilerman or operator trainings for relevant businesses). h) Awareness raising trainings on human rights, gender equality, sustainability and health and safety culture i) Trainings that may support social cohesion of migrants at the workplaces 6)Implementation Support within the Allocated Fund Please see Table 8-14.
Implementation Timeline	The external Business Consultancy Company will be contracted by the SPV within **three months** following the signing of the Finance Agreement and will provide continuous support and services throughout the RAP implementation period (36 months).

Package 2: Pre-relocation Financial Support Package to Business Owners

Table 8-12. Package 2: Pre-relocation Financial Support Package for Business Owners

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Pre-relocation Financial Support Package for Business Owners – for relocation and temporary business interruption period**
Level of Support	Business-level
Number of Businesses	- 29 businesses to be relocated (see Table 3-21). - 8 businesses in Hacıobası located on Land already Expropriated by KGM for Existing State-roads (D-695)
Description of the Package	The pre-relocation financial support package will be provided to owners of affected businesses – whether they are the owner or tenant of the affected business structure – to assist them in identifying suitable relocation premises and preparing these premises to enable the successful re-establishment and continuation of their business operations. Please refer to Section 7.3 for details of the entitlements and the process for delivery of entitlements. 1)Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost done by the business owner at the existing business structure will be paid by the SPV to business owner. This will cover fixed investments/improvements done for the interiors and exteriors of the building. 2)Moving allowance to cover disassembly, transportation and assembly costs: A moving allowance will be provided to cover the costs associated with the disassembly, transportation, and reassembly of movable assets – such as machinery, equipment, stock of materials or products, and furniture – during the relocation of affected businesses. These costs are business-specific and may vary depending on the nature of the assets involved (e.g., sensitive machinery, product inventory). 3)Business relocation support package to cover other relocation-related expenses: A business relocation support package will be provided to cover additional expenses associated with the relocation process. These may include real estate agent service fees, title deed transfer costs, transaction-related expenses, utility subscription fees, and costs related to the renewal of business permits. The package also covers the preparation of necessary documentation and the cost of obtaining approvals from relevant authorities. **Rental allowance for the tenant business owners (3 months).** Please see Section 0 for details. Affected businesses declared their rental rates for the last year as part of RAP surveys and they have been informed that declarations will be subject to verification by the SPV teams prior to delivery of support. Current rental amounts of affected tenant businesses will be verified by the financial and accounting teams of the SPV based on the rental agreements (where available, noting that all affected tenant businesses confirmed that they have formal rental agreements in place except a local meat restaurant for which formality of agreement needs verification). Please see Section 0 for details of the support mechanism. 4)Rental Allowance for Tenant Business Owners: A rental allowance equivalent to three months' rent, based on the market rental rate of the replacement business structure to be rented (assumed to be twice the current rent), will be provided to tenant business owners to support their transition during the relocation process. As part of the RAP surveys, affected businesses declared their rental amounts for the past year. They were informed that these declarations would be subject to verification by the SPV prior to the delivery of support. The SPV's financial and accounting teams will verify the current rental amounts based on available rental agreements.
Implementation Timeline	A detailed, business-specific relocation timeline will be prepared by the SPV during the ESIA disclosure period.

Package 3: Post-relocation Financial Support Package to Business Owners

Table 8-13. Package 3: Pre-relocation Financial Support Package for Business Owners

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Financial support package for business owners – for relocation and temporary business interruption period**
Level of Support	Business-level
Number of Businesses	- 29 businesses to be relocated (see Table 3-21). - 8 businesses in Hacıobası located on Land already Expropriated by KGM for Existing State-roads (D-695)
Description of the Package	The SPV will provide net income loss support to compensate for economic losses incurred during the temporary business interruption period, for up to **six months** or until the successful reestablishment of the affected business – whichever occurs first. Monthly cash compensation will be provided to affected business owners to offset the verified net income loss sustained during this period.
Implementation Timeline	The implementation timeline will be tailored to each business, based on the schedule of the expropriation programme. A detailed, business-specific relocation timeline will be prepared by the SPV during the ESIA disclosure period.

Package 4: Implementation Support Package

Table 8-14. Package 4: Implementation Support Package

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Implementation Support Package**
Level of Support	Business-level
Number of Businesses	- 29 businesses to be relocated (see Table 3-21). - 8 businesses in Hacıobası located on Land already Expropriated by KGM for Existing State-roads (D-695)
Description of the Package	As part of Package 1, the Business Consultant will develop tailored measures to support the successful relocation and re-establishment of affected businesses at their new premises. To facilitate the implementation of these business-specific measures, the SPV will allocate an additional fund (as part of overall of RAP Fund) referred to as the **Business Management Implementation Support Package**. This fund is intended to contribute to the cost of implementing individual business support actions, within the limits of the allocated budget. Examples of business-specific measures eligible for cost contribution from this package may include, but are not limited to: • Costs relevant to formalisation of business and/or workforce • Contributions toward the cost of obtaining certifications or accreditations, where applicable to the business; • Delivery of general and job-specific training programmes by qualified technical experts. Within the defined budget limits, the Business Consultant will establish a fair and proportionate allocation mechanism to distribute the fund among eligible businesses. This mechanism will take into account key criteria such as the number of employees, annual turnover, and individual business needs (e.g., not all businesses may require certifications, accreditations, or job-specific training). A tailored approach will be adopted to ensure that the support is relevant and responsive to the specific conditions of each business. Based on the results of the needs assessment – and with input from sectoral technical experts – the Business Consultant will also design a **Job-Specific Skills Training Programme** for relevant businesses. In line with this programme, the SPV will retain competent trainers to deliver one-time, job-specific training sessions to employees of affected businesses. These sessions will aim to enhance existing professional skills and will be tailored to the operational context of each business. The Business Consultant will define clear eligibility criteria for participation in these trainings and disclose them transparently to potentially eligible employees. The trainings will be aligned with both existing and anticipated employment opportunities within the Project and the surrounding region. The objectives, scope, target groups, and durations of the trainings will be determined in consideration of each business's unique characteristics and workforce needs
Implementation Timeline	Throughout RAP implementation period

Package 5: Financial Support Package to Employees

Table 8-15. Financial Support Package to Employees

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Financial support package to employees for relocation and temporary business interruption period**
Level of Support	Employee-level
Number of Employees	136 employees of businesses to be relocated (including 9 employees with vulnerabilities): ○ 131 formal employees ○ 5 informal employees (all male)
Description of the Package	The SPV will provide compensation of up to three months' gross salary for each employee who was either permanently employed at the affected business for at least six months prior to relocation, or who began working at the business before the disclosure of the RAP. This support will be delivered in accordance with a payment mechanism developed by the SPV's legal and financial teams, as outlined below: 1)Formal Employees Salary payments for formal employees will be executed through a tripartite protocol involving the SPV, the employee, and the business owner. The compensation amount will be determined based on the employee's most recent payroll record. To validate the payment, the business owner will be required to submit the employee's latest Social Security Institution (SGK) registration document. Eligibility will apply to formal employees who were permanently employed as of: (i)the date of signing the consent agreement (Article 8) with the business owner, in cases resolved through mutual agreement, **or** (ii) the date of the expropriation court decision (Article 27), in cases resolved through court ruling. All payments will be transferred directly to the bank accounts of eligible employees 2) Informal Employees For informal employees, eligibility and compensation amounts will be determined based on consultations with the affected individual, business owners, and/or other employees or relevant third-party witnesses. These consultations will take place at different times to allow for cross-verification of declarations. Supporting documents or other forms of credible evidence will also be reviewed where available. Informal employees who were working at the affected business at the time of early consultations and notification for the land acquisition process will be eligible for salary compensation. The payment mechanism for informal employees will be agreed upon between the SPV and the employee, with safeguards in place to ensure that the compensation reaches the intended recipient. All transactions made by the SPV on behalf of informal employees will be properly recorded and documented. Support for Employees Dismissed or Lose Jobs Due to Relocation If any employees lose their jobs or are dismissed for reasons beyond their control and directly linked to the business relocation process, these cases will be identified by the external Business Consultancy Company. The following support measures will be applied to affected employees: • **Priority for Project Employment:** Eligible employees will be given priority consideration for employment opportunities during the Project's construction phase, provided they meet the Project's employment criteria (e.g., qualifications, skills, health and safety compliance, etc.). • **Advisory Support by Business Consultant:** Affected employees will have access to consultations with the SPV's Business Consultant to explore alternative employment opportunities aligned with their skills, as well as other options that may support job replacement within the region. • **Additional Case-Specific Measures:** Where appropriate, further tailored measures may be developed and implemented on a case-by-case basis, taking into account the specific circumstances and vulnerabilities of the affected employee(s).
Timetable	Throughout RAP implementation period

8.3. Community Development

The SPV will develop and implement a Community Development Plan (CDP) with the objective of maximizing the Project's long-term positive impacts on local communities by enhancing economic opportunities and generating employment.

The CDP will go beyond impact mitigation and aim to deliver additional sustainable benefits to local communities. It will outline specific projects to be implemented, based on a needs assessment (e.g., vocational training, capacity development, etc.). It will have a dedicated budget, which will be defined in the plan and allocated and managed by the SPV.

Projects developed under the CDP may support the implementation of the RAP, depending on their timing, nature and objectives. In this context, initiatives aimed at supporting agricultural activities within the communities will take into account the feedback received from PAPs during RAP surveys.

The final list of community development projects to be supported will be determined by the SPV in accordance with its corporate policies, with technical input from the external Agricultural Consultancy Company, as needed for the agricultural projects. This process will be guided by the outcomes of the final needs and opportunities assessment to be conducted as part of RAP implementation.

The following project proposal is an example based on the outcomes of consultations and assessments carried out as part of the RAP process. The feasibility of this project will be evaluated by the SPV during the construction phase. Depending on project circumstances, the implementation of CDP projects may occur in the later stages of construction or in the early years of operation.

Project Proposal for Consideration by SPV: Supporting Establishment of a Greenhouse Vegetable Producers' Association

In the Project area, the vast majority of privately owned land parcels affected by expropriation are used for **greenhouse vegetable cultivation.** Some of these producers have had their greenhouses expropriated, while others have lost open land where greenhouses are located. For producers affected by expropriation, the most viable option to improve their incomes appears to be organisation through **producer associations**. In all three districts along the expropriation corridor, such producer organisations are already common. Although tropical fruit cultivation is still relatively new in the region and the number of growers is limited, a "**Tropical Fruit Producers' Association**" has already been established. Additionally, in the same region, other farmer organisations such as the "**Avocado Producers' Association**," "**Carob Producers' Association**," and "**Banana Producers' Association**" exist, alongside traditional associations for milk and honey producers.

Greenhouse vegetable producers, who outnumber the members of the above-mentioned associations, could also organise under a "**Greenhouse Vegetable Producers' Association**," which would help them achieve better bargaining power, especially in terms of sales prices. Greenhouse cultivation in the region is typically carried out by small family farms, and organising under a producer association would provide these farmers with improved market access and better price advantages.

Given the slow pace of capital accumulation in agriculture and the fact that most of the affected producers operate small family farms, the Project's support in mobilising the initial capital required for such organisation or a similarly impactful support could be highly beneficial.

The SPV, with support from implementation partners, will consult and collaborate with the District Directorate of Agriculture and Forestry, and academic experts from the Faculty of Agriculture at Akdeniz University – who specialise in cooperatives and producer organizations – and will organise focus group meetings, seminars, and similar activities to encourage affected farmers to join producer associations and to explore opportunities for supporting the establishment of such organisations.

According to Article 10 of Law No. 5200 on Agricultural Producer Associations, the conditions required for farmers wishing to become members of such associations are as follows:

a. Engaging in market-oriented production related to the product or product group in which the association operates,
b. Possession of a farmer certificate,
c. Being at least eighteen years old for individuals.

In addition, for a newly established *Greenhouse Vegetable Producers Association* to be approved by the Ministry of Agriculture and Forestry, the total minimum production capacity of its members must represent at least 10% of the district's total production for the respective product or product group within the plant production category. The number of greenhouse producers whose land was expropriated along the Motorway route in Manavgat would alone meet this threshold.

As part of this initiative – or through a complementary project – there may also be potential to promote women's agricultural cooperatives for affected women farmers, especially for those who do not own land but participate in agricultural activities. These cooperatives could enable shared land use, collective production, and profit-sharing models, helping affected women farmers gain economic independence and strengthen their participation in the post-resettlement recovery process.

Projects to be developed and implemented under the CDP will be determined by the SPV, based on a comprehensive needs assessment to be conducted during the RAP implementation period, and aligned with the SPV's corporate policies and strategic priorities.

9. Resettlement Sites

Consultations conducted with affected people during the RAP field surveys in May 2025 revealed that awareness of the Project has only recently become widespread among most stakeholders. While some individuals reported having heard of the Project nearly a decade ago, many noted that they did not believe it would advance to the implementation stage. It was only when the KGM began more visible field identification works and accelerated boundary marking activities, along with the initiation of expropriation procedures in certain settlements[103] in February 2025, that the Project's realisation became tangible to local residents.

Accordingly, one evident outcome of the RAP field surveys was that people with affected houses and businesses have only recently realised the eventual need for relocation. However, since most of the affected communities have not yet been officially informed by KGM or Project representatives and given that there have been changes to the Project route in certain sections in the past, some residents continue to believe that relocation of houses might still be avoided and that further route modifications may be possible. To address communication gaps to date and provide affected communities with accurate and timely information regarding the Project, a Stakeholder Engagement Action Plan (SEP) specific to RAP disclosure and engagement has been developed, as presented in Section 10.3.

Due to these facts, almost none of the affected households or businesses have yet started making relocation plans or identified any resettlement site alternatives. A significant portion of affected households surveyed as part of RAP do not own second homes and lack concrete relocation plans. As committed in the Entitlement Matrix, following the approval of this RAP by the Lenders, the SPV – RAP Implementation Team will start providing proactive support to affected.

The resettlement sites may be urban (district or city centres) or rural depending on the preferences of each affected household. Many stakeholders in affected settlement repeatedly emphasized that relocation to urban areas would force them into wage labor and disrupt their agrarian way of life. This was viewed as undesirable, particularly by elderly residents, who showed strong emotional attachment to their homes and lands. However, current Turkish expropriation laws do not allow for land-for-land compensation in most cases, despite the existence of a 'barter' clause, which remains largely unused in practice due to land scarcity or high land value.

The key criteria for selection of resettlement site alternatives are summarised in Table 9-1.

Table 9-1. Key Criteria for Selection of Rural and Urban Resettlement Sites

Options	Key Considerations and Remarks
(A) Urban resettlement alternative (for example in Serik, Manavgat and Alanya district centres)	
Moving into second homes owned by affected households	- However, for those households that do have access to alternative residences, this option may still be viable. The relocation support packages to be provided in accordance with the Entitlements Matrix are expected to facilitate and ease their transition.
Purchasing or renting a new house from the market	- - This option is subject to market availability. - It may limit access to existing agricultural income sources but may increase the availability of employment sources, particularly in tourism sector.
(B) Rural resettlement	
Moving into second homes owned by affected households	- A significant portion of affected households do not own second homes and lack concrete relocation plans. - However, for those households that do have access to alternative residences, this option may still be viable. The relocation support packages to be provided in accordance with the Entitlements Matrix are expected to facilitate and ease their transition.
Purchasing or renting a new house from the market	- This option is subject to market availability. In most rural settlements, respondents of the RAP survey indicated that there are limited or no available housing options, which may make this alternative largely unfeasible in many locations.

[103] Deniztepesi and Sarıabalı (Serik), and Taşağıl and Şişeler (Manavgat).

Options	Key Considerations and Remarks
Landowners: Constructing a new house on an alternative land owned by the affected households	- Self-constructed houses must be at acceptable technical and construction quality standards. The SPV may need to be engaged in the contractor selection and appointment processes. - Vulnerable households (such as elderly, disabled, women-headed households among others) would need support in engaging qualified contractors who will build the new houses at acceptable technical and quality standards, including necessary accessibility standards provisions.
Informal land users: Constructing a new house on an alternative land to be allocated by the relevant authorities	- This option is subject to land availability and permit by the relevant authorities. - Most residents settlements characterised by rural conditions expressed a strong preference to remain in or near their current locations, citing deep social ties, perceived safety within known boundaries, and a desire to maintain existing community structures. This was particularly evident in Sarıabalı, where informally settled households emphasized the importance of remaining with neighbours in the same valley. - Self-constructed houses must be at acceptable technical and construction quality standards. The SPV may need to be engaged in the contractor selection and appointment processes. - Vulnerable households (such as elderly, disabled, women-headed households among others) would need support to complete permitting process for land allocation and engaging qualified contractors who will build the new houses at acceptable technical and quality standards, including necessary accessibility standards provisions. - In certain settlements, affected people could be able to share their insights on locations that may be considered as resettlement sites for construction of new homes, subject to evaluation and approval by related authorities: o Sarıabalı: Treasury lands in the settlement o Emişbeleni, Alanya: State-owned parcels at the locality referred to as *Cehennem Bedeni* by the locals o Toslak: Treasury lands in the settlement However, these reflect the perception of local respondents, and the feasibility and legal status of such lands for such use for constructing new homes must be formally assessed and confirmed by the relevant public authorities. - The request for proximity-based housing solutions is influenced by cultural factors. Many of the affected communities have Yörük (nomadic) cultural roots, and maintaining communal cohesion is a priority. Where relocation is required, residents have clearly indicated a preference to be resettled in close proximity to their neighbours, replicating existing social networks in new locations. This is viewed as critical for both emotional resilience and mutual support structures. - Local community members, including mukhtars, suggested that grouped housing projects, similar to the forest fire housing models, could be considered for households facing displacement. However, these preferences are conditional. There is a strong community sentiment against apartment-style housing, with most residents expressing a preference for detached, single-family homes, similar to their current life style. - Apartment-style units are viewed as acceptable only when assigned to extended family members (e.g. a father and his adult children living in separate units within the same building). The general preference remains for low-density housing that allows families to retain autonomy and privacy. - Many households suggested that, if housing is to be built, it should be constructed by Housing Development Administration of Türkiye (TOKİ); however, they also emphasize that this should not result in them being indebted - In Kalemler Village, forest fire housing units have been constructed as cluster-type settlements using a standardised architectural model. A similar approach was applied in other villages, where individual houses lost to fire were reconstructed based on the same two-storey model. Examples include Aşağı Işıklar and Emişbeleni neighbourhoods. However, concerns have been raised regarding construction quality, particularly in villages where homes were rebuilt individually. In Kalemler, interviewees expressed confidence in the structural safety of the houses in the event of an earthquake but were dissatisfied with the finishing quality.

Action Plan for Selection of Resettlement Sites

1. SPV to prepare Detailed Implementation Schedules for Parcel Subject to Relocation of Affected Houses and Businesses

In Q3 2025, the SPV – RAP Implementation Team will prepare a detailed implementation schedule for parcels subject to the relocation of affected houses and businesses in line with the expropriation and construction programme.

2. SPV to facilitate Consultations with the Relevant Authorities regarding the Feasibility of Implementation Plans

Prior to preparation of house and business-specific Implementation Plans, one of the most important tasks will be undertaking consultations with the relevant authorities (such as KGM, National Estate, Forestry, TOKI, municipalities) to confirm and ensure the feasibility of implementation plans, as the construction of new homes at the considered or selected resettlement sites will be subject to approval and allocation by the authorities.

3. SPV to prepare House and Business-specific Implementation Plans

In line with the expropriation and construction schedules, the SPV – RAP Implementation Team, supported by their third-party consultants, will begin preparing individual implementation plans tailored to the specific characteristics and needs of each affected household and business enterprise, starting from Disclosure Period:

- House-specific Resettlement Implementation Plans
- Business-specific Resettlement Implementation Plans

These implementation plans will be developed progressively, in line with the linear construction schedule of the Project and will be fully consistent with the principles outlined in this RAP – particularly those in the Entitlements Matrix.

The following important considerations stemming from the Early Consultations and Notification for Land Acquisition Process defined under RAP will be reflected in developing the implementation plans, to ensure sufficient time for identification and preparation of resettlement sites, and ensuring management of resettlement process in accordance with the principles of IFC PS, as set out in the RAP:

- Affected houses: The SPV will notify the owners and users (formal and informal) of the affected houses **at least 3 months in advance of the start of expropriation**. If expropriation has already been concluded (through Article 8 or Article 27), the SPV will notify the owners and users of the Project schedule, and the owners or users will be granted a 6-months period to vacate the property following the notification.
- Affected businesses: The SPV will notify the business owners **at least 3 months in advance of the start of expropriation.**

For each affected household and business, the plans will identify **resettlement site alternatives** and **provide clear guidance on the relocation process**.

Each plan will include simple and concise information tailored to the specific circumstances of the household or business, including actions to be taken and implementation timeline.

To facilitate ease of use and enable effective monitoring of implementation progress, the plans are intended to be developed in a tabular format.

4. SPV to execute House and Business-specific Implementation Plans by the SPV

The SPV – RAP Implementation Team will execute the implementation plans. The SPV and EPC construction teams may assign civil engineers and technicians to advise and supervise affected individuals who prefer to construct their own houses. These technical personnel would provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding.

The implementation plans and progress on their execution will be documented by the SPV as part of the periodic internal RAP monitoring reports, which will be prepared regularly until the RAP Completion Audit, as outlined in Chapter 13.

10. Stakeholder Engagement and Information Disclosure

10.1. Previous Engagement and Information Disclosure

This section highlights the key engagement and information disclosure activities related to expropriation and resettlement conducted to date. Details of public participation meetings held under the national environmental impact assessment (EIA) process, along with other ESIA-specific engagement and information disclosure activities, are provided in the stand-alone Project Stakeholder Engagement Plan (SEP).

10.1.1. Expropriation Process

The expropriation process conducted by the KGM in accordance with the Expropriation Law of Türkiye includes mechanisms for information disclosure and consultation with people affected by Project-related land acquisition, as summarised below:

- Publication of Accelerated Expropriation Decisions:

In Türkiye, accelerated expropriation decisions are disclosed to affected communities and the broader public through publication in the Official Gazette of Türkiye.

For this Project, the accelerated expropriation decision issued by the Presidency on 29 March 2025 was published in the Official Gazette on 30 March 2025.

The decision included a general schematic of the Motorway alignment and a list of all neighbourhoods covered under the scope of the decision. As a result, the settlements subject to expropriation became publicly known.

- Information of Owners and Land Users during Asset Inventory and Valuation:

Mukhtars of the affected settlements and the affected communities, including people affected by Project-related land acquisition, are informed about the expropriation and related procedures during the on-site identification and inventory of assets studies conducted by the appointed engineering firm. These engagements serve as a key point of contact for information dissemination and clarification.

- Information of Owners through Official (Article 8) Notifications sent by KGM to Owners and Shareholders of Affected Assets

In line with the Expropriation Law, Article 8 notifications are dispatched by the KGM via registered returned mail to all owners and shareholders of the affected assets. This includes the legal heirs of deceased owners.

These official letters contain detailed information on the following:

  - Date, time, and location of negotiation meetings
  - Procedure to be followed in case of agreement (including title deed transfer and payment of the expropriation fee)
  - Legal procedure to be followed by KGM in case of disagreement
  - A list of documents that affected persons must bring to the meetings and tasks they must complete to finalize the negotiation and agreement process. This includes, but is not limited to, documentation on inheritance and succession.

- Information of Owners during in-person Negotiation Meetings held as per Article 8

The in-person negotiation meetings are conducted by KGM's Negotiation Commission at the settlement level, either within the settlement itself or at a nearby venue (such as local directorates of relevant governmental institutions) that is well known and easily accessible to the affected people.

Prior to the start of the negotiations on the meeting day, the Commission provides participants (the owners and shareholders of the affected assets) with the following information:

- General information about the Project and motorway construction works
- The Expropriation Law of Türkiye and the associated expropriation procedures
- How the expropriation value is determined for affected assets (lands, structures, trees, crops), with necessary clarifications and justifications related to valuation
- The rights of individuals whose property will be expropriated
- Expropriation procedures and works carried out up to the date of the meeting (such as field identification works, valuation, etc.), and
- Expropriation procedures to follow after the meeting, in case of agreement and disagreement

Following the general information sessions, in-person engagement and negotiations are conducted. The outcomes of these negotiations – whether agreement or disagreement – are documented by KGM using relevant records, such as agreement memorandums signed by the KGM's negotiation commission members and respective owner in case of agreement.

The Article 8 negotiation meetings held to date are listed in Chapter 2, Table 2-19.

- Informing Relevant Institutions and Legal Entities through Official Correspondence

KGM has informed relevant institutions and legal entities through official correspondence about the Project route. This communication also aimed to identify any existing or planned infrastructure facilities – such as energy transmission lines, drinking water systems, wastewater and stormwater infrastructure, and natural gas pipelines – that may overlap with the Project. Where applicable, KGM also requested consent for activities to be undertaken on parcels under the ownership or control of these entities.

Please refer to Section 3.2.1.1.2 and Section 3.2.3 for detailed information on this process.

10.1.2. Engagement between the SPV and KGM

The Senior Management of the SPV regularly engages with the General Directorate of KGM on various project management aspects, including the land acquisition process, RAP study, alignment with applicable international standards, as well as subjects related to the Project programme, design, permitting, construction, and Project governance.

The SPV maintains daily engagement with the 13th Regional Directorate of KGM in Antalya, particularly for coordinating ongoing design and construction activities, as well as managing and monitoring the progress of land acquisition and permitting works. To this end, the SPV's Expropriation Manager and team has been working closely with the Regional Directorate to align project planning with the expropriation process and to obtain the expropriation data necessary for RAP preparation. Through the Expropriation Manager and team, the SPV also ensures that ongoing works remain consistent with the key principles outlined in the RAP, and that necessary actions are proactively taken to ensure compliance with the Lender's land acquisition and resettlement requirements.

Key engagement activities conducted between KGM, the SPV, and the RAP Consultant – aimed at informing the authority about the RAP study and obtaining their input and as applicable feedback on the RAP documentation and its implementation – are summarized in Table 10-1.

Table 10-1. Key Engagement with KGM as part of RAP Preparation

Date of Engagement	Attending Parties	Purpose of Engagement
13 June 2025	KGM Directorate General – Department of Immovables SPV – General Manager	○ Frequency of valuation updates ○ Actions to increase agreement rates during Article 8 negotiations ○ Depreciation ratio adjustment strategy ○ Capacity enhancement and staffing (engineers and technician) actions to be taken to expedite ongoing valuation works ○ Planning of expropriation budget and allocations
12 May 2025	KGM – Regional Directorate in Antalya SPV – Expropriation Manager	○ Consultations regarding the mechanisms that may be established to facilitate inheritance procedures pursuant to Article 3, subparagraph (c) of Circular No. 2024/3 on Expropriation Procedures, issued by the General Directorate of Land Registry and Cadastre.
6 May 2025	KGM Directorate General – Department of Immovables KGM – Regional Directorate in Antalya SPV – Senior Management SPV – Expropriation Manager EPC – Project Manager	○ Progress of expropriation activities in line with the work schedule ○ Expropriation budget allocations

28 April 2025	KGM – Regional Directorate in Antalya
	SPV – Expropriation Manager
	RAP Consultant Team – Project Manager and Senior Expropriation and Valuation Expert
		○ Inform the authority about the RAP study
		○ Consult on the expropriation and valuation procedures followed by KGM
		  ○ Requirements of the international standards in terms of resettlement planning and implementation and their applicability to the Project
		  ○ Expropriation procedures including Article 8 and 27
		  ○ Identification of heirs of deceased owners
		  ○ Potential mechanisms for resolution of inheritance issues of affected people
		  ○ Ongoing field identification and inventory of assets works
		  ○ Valuation methodology implemented by KGM for the the Project (for lands, orchards, open fields, greenhouses and other structures)
		  ○ KGM's public information mechanisms
		  ○ Management of land acquisition related grievances and requests received by KGM

17 April 2025	KGM Directorate General – Head of Immovables Lenders representatives SPV Senior Management	○ Resettlement Action Plan (RAP) studies ○ Process for review of RAP by KGM ○ Ongoing valuation studies ○ Strategies for mitigation of impacts on informal users
26 March 2025	KGM Directorate General – Head of Immovables SPV Senior Management	○ Project's governance structure ○ Accelerated expropriation decision ○ Preparation of the expropriation list. ○ Project's non-agricultural land use permitting process

10.1.3. Project-specific Actions taken by SPV to date

- Project Information Offices opened by the SPV in District Centres:

The SPV has rented a Project Information Office in **Serik district** centre in May 2025. There will be Project personnel available at these offices. These offices will be accessible to public and will serve to enhance mechanisms for information of the public about the Project and respond to their questions and concerns effectively.

- Community Liaison Officers (CLOs) employed in the Project:

The SPV has employed **three** CLOs (two female and one male) in May 2025. These CLOs will maintain ongoing engagement with the muktars and affected people in affected settlements.

- Distribution of KGM's Booklet on Procedural Steps of Expropriation in Affected Settlement:

The SPV has decided to distribute printed copies of KGM's booklet on procedural steps of expropriation in affected settlements (Appendix F).

In May 2025, the copies were initially distributed by the CLOs in the following settlements (see Appendix G):

  - **Serik:** Aşağıçatma, Belpınarı, Burmahancı, Cumalı, Çandır, Deniztepesi, Sarıabalı, Üründü, Yukarıkocayatak
  - **Manavgat:** Çakış, Taşağıl, Hocalar, Gündoğdu, Yavrudoğan, Çolaklı, Kalemler, Şişeler, Evrenleryavşi, Yukarıışıklar, Dikmen, Evren, Bucakşeyhler, Aşağıışıklar, KAraöz, Aksaz, Uzunlar, Yalçıdibi
  - **Alanya:** Alara, Telatiye (Konaklı)

The distribution will continue in line with the Project's expropriation and construction schedules.

- Grievance boxes and forms:

The SPV – CLOs have collaborated with the mukhtars and placed the grievance boxes and forms in the following settlements in May and June 2025:

  - **Serik**: Belpınarı, Burmahancı, ÇAndır, Eniztepe, Kayaburnu, Üründü, Yukarıkocayatak
  - **Manavgat**: Çakış, Hocalar, Gündoğdu, Çolaklı, Kalemler

10.1.4. RAP Preparation

The RAP Consultant Team has conducted a series of meetings and surveys to support the RAP preparation process. These engagements were designed to gather essential data directly from the affected people and to incorporate their feedback into the RAP through participatory consultation:

- A resettlement scoping field visit was carried out by the RAP Consultant Team, during which consultations were held with the 13th Regional Directorate of KGM, the District Agricultural Directorates of Serik, Manavgat, and Alanya, the Serabir Greenhouse Association, as well as settlement heads and affected persons – including those with houses, greenhouses, and agricultural lands such as orchards – in the identified settlements. During the visit, the settlement heads and affected persons were informed about the key steps of the expropriation process – including Article 8 invitations, negotiation meetings, procedures applicable to both agreement and disagreement cases, and steps to resolve any existing inheritance issues. They were also briefed on the upcoming RAP surveys, as well as future engagement and information dissemination activities to be carried out by KGM and the SPV. List of the engagement carried out in this scope is presented in Section 5.1.2.

- A comprehensive RAP survey programme was implemented by the RAP Consultant in May 2025. As part of this effort, pre-designed structured questionnaires were administered to settlement heads and affected individuals, including owners and both formal and informal users of impacted lands, residential structures, greenhouses, and businesses included with the RAP survey sample (please see Section 5.1 for the survey methodology). The surveys established baseline conditions, as detailed in Section 5.2, and gathered critical information to inform the RAP – particularly regarding resettlement needs and livelihood restoration assistance and planning, which are integrated throughout the document.
- In May 2025, the SPV's third-party implementation partner launched a parallel survey programme to complement the RAP efforts. This initiative aimed to administer additional questionnaires to owners and users of affected houses and greenhouses, with the objective of achieving a full census of these impacted structures.

10.2. Engagement and Information Disclosure during Disclosure Period

Public Disclosure of E&S Documentation

In line with the international standards and potential Lenders' E&S risk classification approaches, the Project has been classified as a "Category A" activity. Accordingly, **in addition to this RAP**, an Environmental and Social Impact Assessment (ESIA) Package has been prepared by the ESIA Consultant.

The ESIA package comprises the following components:

- ESIA Report (June 2025)
- Stakeholder Engagement Plan (SEP) (June 2023)
- Non-Technical Summary (NTS) (June 2023)
- Other Project-specific E&S management plans:
    - Air Quality and Emission Management Plan
    - Biodiversity Action Plan (BAP)
    - Construction Campsite Management Plan
    - Change Management Plan
    - Community Health and Safety Management Plan
    - Environmental Accident and Spill Response Management Plan
    - Hazardous Substances Management Plan
    - Human Resources and Workforce Management Plan
    - Noise and Vibration Management Plan
    - Occupational Health and Safety (OHS) Management Plan
    - Water, Wastewater and Stormwater Management Plan
    - Safety Management Plan
    - Solid Waste Management Plan
    - Subcontractor Management Plan
    - Traffic Management Plan
    - Training and Communication Management Plan

The required components of the ESIA Package and this **RAP will be disclosed in both Turkish and English on the websites of the SPV**[104] and **the Lenders** for a period of **60 days** (the Disclosure Period), in accordance with Lenders' respective disclosure policies. This disclosure aims to inform stakeholders about the Project's activities, impact assessment findings, planned mitigation and monitoring measures, and to gather public feedback on the Project and associated documentation.

The **hard copies** (in Turkish) of the RAP and GLAC will be made available at the following locations during the Disclosure Period.

- Project Information Office in Serik
- Project's Construction Camp Sites
- Offices of the settlement heads (mukhtars)

Feedback received during this period will be reviewed by the SPV and the RAP Consultant and, where appropriate, incorporated into the final version of the RAP upon completion of the disclosure process.

Public ESIA Disclosure and Consultation Meetings in affected Settlements

Following the Lenders' approval of the draft ESIA, **Public Disclosure and Consultation Meetings** will be held, during which stakeholders will be informed about the Project, its potential environmental and social impacts and risks, proposed mitigation measures, and the implementation, monitoring, and reporting responsibilities of various parties, as outlined in Project SEP. Information on Project's displacement impacts, RAP findings and entitlements will also be provided to public to the extent relevant to the public ESIA disclosure meetings..

Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions during the Disclosure Period. Priority will be given to settlements scheduled for expropriation in Q2 and Q3 2025, as listed in Table 10-2. As outlined in Section 10.1.1, prior to the start of the negotiations on the meeting day, the Commission provides participants (the owners and shareholders of the affected assets) with relevant information.

Meetings in other settlements will continue throughout the first year of RAP implementation, in alignment with the expropriation and construction schedules. In these settlements, 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.

Questions, feedback, and suggestions related to the RAP, received from affected people and other interested stakeholders, will be recorded by the SPV CLOs in a dedicated RAP database. Where necessary, follow-up actions will be undertaken by the RAP Implementation Team.

[104] https://www.antalyaalanyaotoyolu.com.tr/ (envisaged to be fully operational by June 2025)

Table 10-2. Priority Settlements to be covered during the Disclosure Period

Group	Target for Article 8 Negotiation Meetings	District	District and Settlements
Group 1	June 2025 (approved by KGM)	Serik	○ Deniztepesi (*) ○ Sariabali (*)
		Manavgat	○ Tasagil (*) ○ Siseler (*) ○ Bucakseyhler ○ Ulukapi ○ Asagiisiklar ○ Yukarisiklar ○ Dikmen
Group 2	July 2025 (planned date by SPV, pending approval by KGM)	Manavgat	○ Seki ○ Kalemler ○ Yeniköy ○ Siseler ○ Evrenleryavsi ○ Dolbazlar
Group 3	August 2025 (planned date by SPV, pending approval by KGM)	Manavgat district	○ Demirciler ○ Karaoz ○ Aksaz ○ Haciali ○ Cevizler ○ Sulek, ○ Haciisali ○ Haciobası
Group 4	September 2025 (planned date by SPV, pending approval by KGM)	Alanya	○ Turkler ○ Emisbeleni ○ Avsallar ○ Incekum

(*) Article 8 negotiations meetings were held by KGM in February 2025.

Guide to Land Acquisition and Compensation (GLAC)

A **GLAC**, providing a concise, clear, and non-technical summary of the RAP, will also be prepared by the SPV following finalisation of the draft RAP, incorporating comments and feedback from the Lenders and the IESC.

Once finalised and approved by the Lenders and the IESC, the **GLAC will be distributed to the mukhtars and affected people** in affected communities to enhance their understanding of the process and to support effective RAP implementation.

10.3. Stakeholder Engagement Action Plan

Specific stakeholder engagement activities to be conducted by the SPV **during the RAP disclosure and implementation phases** are outlined in Table 10-3.

This plan will be **updated** as necessary throughout the RAP implementation phase.

Table 10-3. Stakeholder Engagement Plan for RAP Disclosure and Implementation

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation (incl. Disclosure Period)	During RAP Implementation
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	• RAP (in Turkish) • GLAC (in Turkish) • Presentation of the key RAP findings (in the format to be requested by the authority)	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Through hard copies (in the format requested by the authority) • Official correspondence • Face-to-face meetings	• KGM (Ankara) • SPV offices • Project site offices	• Corporate Senior Management • SPV – General Manager • SPV – E&S Manager	Multiple times prior to Disclosure as necessary (Table 10-1)	Monthly
13th Regional Directorate of KGM				• 13th Regional Directorate of KGM (Antalya) • Project site offices	• Corporate Senior Management • SPV – General Manager • SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director		Weekly (minimum)
Settlement Heads (Mukhtars)	• To inform affected people through the settlement heads about the Project, construction schedule, expropriation process, 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	• RAP (in Turkish) • GLAC (in Turkish) • Expropriation lists • Technical Project information (such as route drawings, design and locations of engineering structures, etc.)	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face meetings • Phone calls and messaging applications	• Project site offices • Offices of the settlement heads or other mutually agreed locations in affected settlements	• SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director • SPV – CLOs • EPC – CLOs	At least one meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	Monthly

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation (incl. Disclosure Period)	During RAP Implementation
Households affected by physical displacement	• To inform affected people about the Project, construction schedule, expropriation process, land entry processes, the RAP study, and the Project grievance mechanism	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to physically displaced households	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings Phone calls and messaging applications	• Affected house plot or mutually agreed locations in affected settlements	• SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director • SPV – CLOs • EPC – CLOs	At least one meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	Weekly until relocation (commencing from Article 8 notifications) Monthly after relocation until they are successfully resettled
Households affected by economic displacement	• To inform affected people about the Project, construction schedule, expropriation process, land entry processes, the RAP study, and the Project grievance mechanism	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to economically displaced households	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings • Phone calls and messaging applications	• Project site offices • Offices of the settlement heads or other mutually agreed locations in affected settlements	• SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director • SPV – Agricultural Expert • SPV – CLOs • EPC – CLOs	At least one meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	Monthly until completion of the livelihood restoration programme under RAP implementation
Vulnerable members of the affected households	• To ensure the information of and engagement with vulnerable people and women regarding the Project, construction schedule, expropriation process land entry processes, the RAP study, and the	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to affected	• Face-to-face individual meetings • Phone calls and messaging applications	• Residences of vulnerable households or mutually agreed locations in affected settlements	• SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director • SPV – CLOs • EPC – CLOs	At least one meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	Monthly

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation (incl. Disclosure Period)	During RAP Implementation
	Project grievance mechanism	households with vulnerable members • Other specially designed materials addressing the particular needs of the affected people					
Affected businesses	• To inform affected businesses (business owners and direct/contracted employees) about the Project, construction schedule, land entry processes, the RAP study, and the Project grievance mechanism	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to affected businesses and their employees	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings Phone calls and messaging applications	• Affected business structures or other mutually agreed locations	• SPV – E&S Manager • SPV – Expropriation Manager • EPC – Project Director • SPV – CLOs • EPC – CLOs	At least one meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	Weekly until relocation (commencing from Article 8 notifications) Monthly after relocation until they are successfully resettled
Lenders	• To inform and update the Lenders about the RAP	• Annual reporting to Lenders • Periodic E&S Monitoring Reports during construction and operation	• Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Reporting • E-mail correspondence • Phone calls • Face to face meetings	• Project website (https://www.antalyaalanyaotoyolu.com.tr/) • Project site offices Other venues to be agreed upon	• Corporate Senior Management • SPV – General Manager • SPV – E&S Manager	Weekly or on demand	Quarterly monitoring site visits during construction (by Lenders or their IESC) Periodic monitoring site visits during operation (by Lenders or their IESC)

11. Grievance Management Mechanisms

The Stakeholder Engagement Plan (SEP) for the Project, including the public grievance mechanism, has been developed as part of the Environmental and Social Impact Assessment (ESIA) Package, in accordance with international requirements.

This Chapter focuses on the Project-specific grievance mechanism established for managing **grievances specifically resulting from land acquisition, resettlement, and livelihood restoration,** through the following components:

- Project-specific grievance mechanisms
- Collaboration with KGM for the management of land acquisition-related grievances
- Collaboration with the EPC Contractor for the management of construction-related grievances
- Appeals mechanisms

KGM, as the designated authority for expropriation, collects and manages grievances, objections, and feedback (e.g., requests, suggestions) related to land acquisition. If such land acquisition-related grievances or feedback are collected or received by the SPV through the implementation of the Project SEP, the SPV will convey them to KGM in writing. Furthermore, the SPV will consolidate all land acquisition–related complaints – collected by the SPV, the EPC Contractor (including subcontractors), KGM, and other relevant authorities – into a master complaints tracker.

Land-acquisition related grievances and feedback of public that require action by the SPV will be handled by the SPV in accordance with the Project-specific grievance mechanism described in Section 11.1. This mechanism is accessible to affected parties identified in this RAP, including communities, owners, and formal and informal users of the affected lands and assets, and/or people whose livelihoods may be affected by the Project. The SPV will collaborate with the EPC Contractor for the collection, registration, and management/resolution of construction-related grievances (e.g., damages to crops and assets, spillages onto neighbouring parcels), as described in Section 11.3.

11.1. Project-specific Grievance Mechanism

The key principles of the Project-specific Grievance Mechanism for addressing grievances resulting from land acquisition, resettlement, and livelihood restoration – aligned with IFC PS5 – are as follows:

- designed to specifically address grievances resulting from land acquisition, resettlement, and livelihood restoration;
- use culturally appropriate methods taking into account specific cultural and traditional mechanisms for raising and resolving grievances;
- scaled to the risks and adverse impacts of the Project and have communities and people affected by Project-related land acquisition as its primary user and stage of the Project and land-acquisition process;
- accessible with clear communication and ease of use for all affected people including vulnerable individuals;
- seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern;
- does not impede access to judicial or administrative remedies.

The SPV has started informing the settlement heads and affected people in settlements affected by the Project-related land acquisition about the mechanism including the contact details of the Project.

Grievances raised by external government agencies, legal entities or other institutional stakeholders – will also be addressed through this mechanism.

During implementation of the mechanism, the SPV will:

- ensure that all complaints are taken seriously and treated fairly;
- encourage use of the GM and provide assurance that there will be no retribution for participation;
- ensure protection of the identity of complainants
- communicate the rights of stakeholders to use remedies such as external mechanisms, third parties, or the judicial system.
- In the case of allegations of gender-based violence, sexual exploitation, and abuse, the SPV will ensure all allegations are treated ethically by trained members of the Grievance Committee and in line with a survivor-centred approach.

Grievance Committee

A Project-level Grievance Committee, consisting of the following members and acting as a redress group, will be set-up for effective implementation of the Project-specific Grievance Mechanism and monitoring of actions:

- SPV – General Manager
- SPV – E&S Manager
- SPV – Expropriation Manager
- SPV – CLOs
- SPV – Agricultural expert
- EPC – Project Director
- EPC – E&S Manager

The SPV – General Manager and EPC – Project Director will oversee the implementation of the mechanism at the SPV and EPC Contractor levels. The E&S Manager of the SPV, with support from the SPV's Expropriation Manager, will hold overall responsibility for ensuring the effective implementation of the grievance mechanism for managing land acquisition-related grievances of affected people as part of RAP implementation. The SPV's Expropriation Manager will ensure effective coordination and collaboration with KGM for the management of land acquisition-related grievances and concerns. The day-to-day implementation of the mechanism will be carried out by the SPV's CLOs, with support from the EPC – E&S Manager and EPC Contractor's CLOs. The agricultural expert of the SPV will also provide support for the management and resolution of grievances related to livelihood risks and impacts on agricultural land users. The management of gender-related issues associated with land acquisition grievances will be led by the female CLOs of the SPV and EPC, under the supervision of SPV's E&S Manager who will be trained to address those issues and concerns[105].

During the land-acquisition and construction phases – when the land acquisition related grievances are anticipated to be most frequent – the Grievance Committee will convene monthly, either physically or remotely, to review pending grievances, assess the responses provided to stakeholders, and evaluate the effectiveness of actions taken to resolve key issues, with the aim of addressing non-judicial disputes arising from various Project-related matters.

RAP Grievance Database

The SPV will establish a **dedicated RAP Grievance Database** to consolidate all land acquisition-related complaints – whether received by the SPV, the EPC Contractor (including subcontractors), KGM, or other relevant authorities – into a master complaints tracker.

Any grievance or feedback – whether verbal or written – submitted through these various channels will be recorded by the SPV – CLOs, with support from EPC – CLOs – in this dedicated database.

[105]Such as allegations of gender-based violence, sexual exploitation, and abuse associated with the land acquisition and compensation process.

Personal Data Protection

The data recorded and processed in the RAP Grievance Database will be managed in compliance with the requirements of the Law on the Protection of Personal Data (Law No. 6698, 2016).

The mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

Grievance and Feedback Collection Channels

The grievance and feedback collection channels to be used in the Project are summarised in Table 11-1.

The public will be informed about these channels through announcements posted on information boards to be placed in mukhtars' offices, local coffee houses, mosques, where available women's community centres, and other public areas, as appropriate.

Table 11-1. Channels for Collecting Complaints and Feedback

Channel	Explanation
Project website	• Project website https://www.antalyaalanyaotoyolu.com.tr/[106]
E-mail	• info@antalyaalanyaotoyolu.com
Mail or In-person Application – Ankara Office	• Centre: Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye • Office: Maidan İş Yaşam Merkezi, Mustafa Kemal Mah. 2118. Cad. B Blok, Kat 10, Daire 105, Çankaya, Ankara, Türkiye
Mail or In-person Application – Project Information Office	• Orta Belek Caddesi No:7, Kapi no: 9 Serik, Antalya, Türkiye
Phone (toll free line)	• +90 850 202 07 07
CLOs	• CLOs will be the primary focal points for collecting and registering grievances and feedback – whether verbal or written – received during public and individual meetings, as well as via phone calls, emails, correspondence, etc. • CLOs will ensure responses are provided to the grievance/feedback holders within the defined timeframes. • Where necessary, CLOs will assist stakeholders in completing grievance and feedback forms.
Phone (CLO) – male	• +90 536 906 38 77
Phone (CLO) – female	• +90 530 978 78 42 • +90 539 935 16 46
Grievance boxes and forms	• Grievance and feedback boxes, along with corresponding grievance forms (as included in the Project SEP), will be installed and regularly maintained by the SPV – CLOs in all affected settlements and at relevant project work sites. These will be located at one or more of the following locations, as appropriate: - Project construction camp sites - Project temporary facility sites - Muktar offices - Local coffeehouses - Areas where women commonly gather and/or locations that women would feel comfortable visiting • Grievance and feedback forms will also be available on mobile Project vehicles. This includes vehicles of SPV and EPC CLOs, HSE staff, and other community-facing managers and directors working at Project sites.
Social media platforms	• To be established as appropriate in due course

[106] Envisaged to be fully operational by June 2025.

Channel	Explanation
Other community-facing Project representatives – including directors, managers, and personnel of the EPC Contractor and its subcontractors	• SPV and EPC CLOs will establish systematic procedures and maintain daily engagement with relevant subcontractors to ensure that all grievances and feedback – whether verbal or written – collected by subcontractor personnel are promptly conveyed to the appropriate SPV and EPC representatives. • These grievances and feedback items will be recorded by the SPV – CLOs in the **RAP Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP. • SPV – CLOs will provide training to other community-facing representatives of the Project, including directors and managers from both the SPV, EPC and subcontractors, to ensure consistent and effective implementation of the Project Grievance Mechanism.
Personal visits by stakeholders to the Project sites – such as construction camp sites, temporary facility sites, etc.	• The SPV and EPC CLOs will assist visitors to the Project construction camp and other temporary work sites in completing grievance and feedback forms, whenever possible. • If verbal feedback and/or grievances are received during stakeholder visits, the SPV and SPV CLOs – whichever party receives them – will ensure these are duly recorded and addressed in accordance with the Project Grievance Mechanism.
Through Directorate General of Highways (KGM) in Ankara	• **Stakeholders may submit grievances and feedback regarding the Project directly to KGM through KGM's online grievance system:** https://vatandas.kgm.gov.tr/Complaint/Personal?_gl=1*1o6xoq*_ga*MTA4MjcyMTY2My4xNzQ3NjMzNDMz*_ga_P1MD63L4M4*czE3NDgwNzk5NDMkbzMkZzAkdDE3NDgwNzk5NDMkajYwJGwwJGgxMDc2NjUzOTcxJGRVQnBtMnZCVDFEd0FHQ1pWY3ViRWlnRUZOY3IlV19JOHRB • KGM will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV. • These grievances and feedback items will be recorded by the SPV – CLOs in the **RAP Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
Through KGM's 13th Regional Directorate in Antalya	• Stakeholders may submit grievances and feedback regarding the Project directly to KGM's 13th Regional Directorate in Antalya: - 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 • KGM Regional Directorate will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV. • These grievances and feedback items will be recorded by the SPV – CLOs in the **RAP Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
The Presidency's Communications Centre (CIMER)	• **The Presidency's Communication Centre (CIMER)** provides a centralized complaint system accessible to Turkish citizens, legal entities, and foreigners. • It will serve as an alternative and widely recognised channel through which Project stakeholders can submit Project-related grievances and feedback directly to state authorities. • **CIMER Contact Information:** - Website: https://www.cimer.gov.tr/ - Call Centre: 150 - Phone: +90 312 525 55 55 - Fax: +90 312 473 64 94 - Mail: Addressed to the Republic of Türkiye, Directorate of Communications - In-person applications: At community relations desks located in governorates, ministries, and district governorates • Grievances and feedback received by KGM or the Project through CIMER will be recorded by the SPV – CLOs in the **RAP Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
The Presidency's Communications Centre (YIMER)	• **The Foreigners Communication Centre (YİMER)** provides a centralised information and complaint system primarily for foreign nationals residing in Türkiye. • It will serve as an alternative and well-recognised channel through which foreign resident Project stakeholders can submit Project-related grievances and feedback directly to state authorities. • **YIMER Contact Information:** - Website: https://yimer.gov.tr - Call Centre: 157 (available 24/7 and supports multiple languages) - Phone: +90 312 157 11 22 - E-mail: info@yimer.gov.tr • Grievances and feedback received by KGM or the Project through YIMER will be recorded by the SPV – CLOs in the **RAP Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.

Grievance Mechanism – Procedural Steps

The key steps of the grievance mechanism for external stakeholders are summarised in Table 11-2.

The grievance mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure, and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

Table 11-2. Key Steps of the Grievance Mechanism for Land-acquisition related Grievances

Key Steps	Description of the Activities/Tasks
Step 1 – Receive and register	• Grievances and feedback from external stakeholders are collected through the communication channels listed in Table 11-1. • Each grievance is recorded and classified by the designated SPV – CLOs in the RAP Grievance Database, maintained in both written and electronic formats specifically for external stakeholder grievances, in accordance with Project's personal data protection policies. • The stakeholder requests for the deletion of their personal data from any records or grievances, etc. will be addressed.
Step 2 – Acknowledge	• Grievance is formally acknowledged through a personal meeting, phone call, or letter, as appropriate, within **three (3) working days of receipt** by the Project. • If the grievance is not clearly understood, or if additional information is required, clarification will be sought by the SPV – CLOs from the complainant during this step.
Step 3 – Delegate	• The designated SPV – CLO delegates the grievance in writing to the relevant Project department, EPC Contractor, or designated personnel for the preparation of an appropriate response. • The SPV – CLO will assess the subject matter and determine the risk category of the grievance and the timeframe for completion of relevant actions. If necessary, the grievance may be escalated to Project or Corporate Senior Management for consideration. • A response is developed by the SPV – CLO or the relevant team associated with the grievance, with input other corporate or Project teams, and third-parties, as needed. • At the request of the designated SPV – CLO with approval from the SPV – E&S Manager, the Grievance Committee may be involved depending on the complexity of the grievance or when expert opinion on specific matters is required. • Required actions are implemented by the designated Project personnel or teams to address the issue, and their completion is documented in the RAP Grievance Database. • The response is then signed off by the SPV – CLO. This sign-off may consist of either a signature in the database or any written correspondence (through petition, e-mail or message) with the complainant, which will be filed together with the grievance to confirm agreement.
Step 4 – Respond	• The response is communicated by the SPV or EPC CLO to the affected party: - For non-complex grievances that are straightforward and easy to resolve: within **seven (7) working days of receipt by the Project.** - For more complex grievances – where additional stakeholders such as Corporate or Project Senior Management or the Grievance Committee are involved (as outlined in Step 3): **within thirty (30) working days of receipt by the Project.** • The designated SPV or EPC CLO ensures that an appropriate method for communicating the response is agreed upon and implemented, following approval from Project Senior Management or the Grievance Committee, as applicable. • The complainant's response to the resolution is documented to determine whether the grievance can be closed or if further action is necessary. The designated SPV or EPC CLO will use appropriate communication channels – most likely a telephone call, through messaging or face-to-face meeting – to confirm that the complainant has understood and is satisfied with the response. • The complainant's response is recorded in the RAP Grievance Database, and ideally, both parties will sign off to confirm closure of the grievance.
Step 5 – Close	• The grievance is closed with sign-off by the designated SPV or EPC CLO, who determines whether the matter has been adequately resolved or if further attention and action are required. • If additional action is needed, the designated CLO will reassess the grievance and take appropriate steps. Once the CLO confirms that the grievance can be closed, he/she will sign off to formally approve closure – either in the RAP Grievance Database and/or through written communication. • A **Grievance Close-Out Form** (as included in the Project SEP), signed by the designated CLO and including relevant attachments, will be provided to the complainant as proof that the grievance was properly addressed and resolved. Where appropriate, the signature of the complainant will also be requested on the Close-Out Form. • If the actions taken are not satisfactory to the complainant, the SPV, in consultation with the Lenders, will consider and, if necessary, initiate a second-tier grievance management (Appeals Mechanism), as outlined in Section 11.4.

11.2. Collaboration with KGM for Land Acquisition Related Grievances

Potential grievances and feedback from communities related to land acquisition may include the following:

- Disagreement on inventory prepared by KGM
- Disagreement with compensation rates offered by KGM's Negotiation Commission in accordance with Article 8[107] (such cases of disagreement will be managed through court proceedings Article 27 and Article 10 court of Expropriation Law)
- Disagreement on resettlement package provided by the SPV (to be conveyed to the SPV)
- Physical displacement impacts and resettlement sites and request for avoidance or minimisation measures
- Economic displacement impacts and request for avoidance or minimisation measures
- Issues related to orphan or fragmented lands and request for expropriation of entire parcel
- Damage to crops during surveys and works
- Allegations of gender-based violence, sexual exploitation, and abuse associated with the land acquisition and compensation process

Management of grievances collected by KGM that require action by SPV

Grievances and feedback from affected people – such as requests related to design (e.g. additional crossings, relocation or modification of crossings, or requests for expropriation of orphan lands) – are collected by KGM either through written petitions or verbal communication. KGM is responsible for evaluating and managing these submissions.

Requests that require action by the SPV, such as those necessitating consideration during design or construction phases or compensation of damages caused by construction, are formally communicated by KGM to the SPV in writing. The SPV – CLOs will record these in the RAP Grievance Database and manage in accordance with the Project-specific Grievance Mechanism for the RAP.

KGM also follows up to monitor and confirm that the SPV has implemented the requested actions.

Management of grievances collected by SPV that require action by KGM

Should land acquisition-related grievances or feedback from affected people be received by the SPV through the established grievance mechanism, the SPV will formally convey these to KGM in writing. The handling of such grievances will then follow the procedure summarized in Table 11-3.

[107] In the case of an Article 27 process, the Land Seizure Value determined by the court is subject to review by the court experts, and the final Expropriation Value is subsequently established by the courts through the Article 10 procedure. This procedure is initiated by the KGM and carried out by the courts as an integral part of the Article 27 process, without requiring any request or application from affected people. The difference between the Land Seizure Value and the Expropriation Value is settled by KGM in accordance with the court's decision.

Table 11-3. Management of Grievances Collected by SPV

No.	Action	Timeframe
1.	The SPV shall register all land acquisition-related grievances and feedback received from affected people in the **RAP Grievance Database** and formally convey these to KGM in writing.	Within 3 days of receiving the grievance.
2.	The SPV shall initiate and/or coordinate follow-up meetings with KGM, as necessary, to support the effective management of land acquisition-related grievances and feedback.	If deemed necessary based on the nature and urgency of the grievance, the SPV will request a meeting with KGM within 7 days of receiving the grievance. The meeting will take place upon KGM's agreement.
3.	Where relevant and appropriate – and with KGM's approval – the SPV shall collaborate with KGM in addressing land acquisition-related grievances and feedback. This may involve implementing measures aligned with the Project SEP and Grievance Mechanism, including adjustments in design, construction practices, or organisational arrangements.	To be determined on a case-by-case basis in coordination with KGM.
4.	The SPV shall include a summary of all land acquisition-related grievances and feedback in the periodic Project progress reports submitted to KGM.	Monthly throughout the construction phase; frequency for the operation phase to be determined by KGM, if applicable.

11.3. Collaboration with EPC Contractor for Construction Related Grievances

The EPC Contractor will be contractually obliged to report to the SPV all grievances and feedback received in connection with construction activities. These may include issues such as:

- Damage to properties and crops
- Damage to local road
- Disruptions during displacement of existing infrastructure
- Dust, noise, and vibration
- Access restrictions
- Impact on water resources (such as water used for irrigation)

While the EPC Contractor retains primary responsibility for managing and resolving such grievances, the SPV will carry out monthly reviews to ensure that the EPC Contractor's grievance management is consistent with the overarching Project Grievance Mechanism.

With respect to land acquisition processes and the livelihoods of affected people, any construction-related grievances or requests received by the SPV – either through the Project-specific Grievance Mechanism or identified by site teams – will be addressed through appropriate measures. These include, but are not limited to:

- Execution of mutual agreements and compensation for damages to lands, crops and other assets
- Implementation of technical measures to avoid or minimise impacts
- Ongoing monitoring of the situation and engagement with the affected people

11.4. Appeals Mechanism

If a grievance is not resolved to the satisfaction of the complainant, the SPV – in consultation with the Lenders – will consider initiating a second-tier grievance management and appeal mechanism. The purpose of this mechanism is to:

- Re-examine the responses provided to external stakeholders
- Attempt to resolve non-judicial disputes related to various Project matters
- Facilitate the resolution of grievances to the satisfaction of all parties involved

A **Project-level Appeal Committee** will be established in cases where initial grievance resolution efforts are deemed unsatisfactory by the complainant. The Appeal Committee will work in coordination with the Project-level Grievance Committee.

For grievances specifically related to land acquisition and resettlement, the Appeal Committee may include – beyond the core members of the Grievance Committee (as defined in Section 11.1) – additional independent parties such as:

- Certified valuation experts
- Academicians with expertise in the relevant grievance subject
- Independent subject matter experts (such as agricultural experts, livestock experts, etc.)
- Independent legal counsels
- Independent technical experts from professional chambers, reliable private sector parties or non-governmental organisations
- Representatives from local administrations (such as technical staff from KGM and their Antalya Regional Directorate, experts from district directorates of agriculture, heads of affected settlements), where their involvement is appropriate for both the Project and the affected communities

These individuals may be engaged on a case-by-case basis depending on the type and nature of the grievance and will act as independent mediators when appropriate to ensure that grievances are reviewed and resolved with the appropriate technical and institutional insight. Their inclusion aims to strengthen the impartiality and effectiveness of the appeal process.

Grievances from Institutional Stakeholders

The SPV will implement the actions recommended by the Project-level Appeal Committee, in line with its commitment to transparent and responsive grievance management.

However, the existence of this appeal mechanism does not limit stakeholders' rights to pursue external remedies, including judicial or administrative actions, in accordance with the applicable laws and regulations of Türkiye.

In cases that require legal investigation or the involvement of other relevant authorities, the decision to engage the corporate legal team will be made by the SPV – Senior Management.

12. Vulnerable People

People who may experience vulnerable or at-risk status stemming from their race, color, sex, language, religion, political or other opinion, national or social origin, property, or birth. The IFC PS1 includes the following provisions regarding the disadvantaged and vulnerable individuals and groups:

> "*Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, and as part of the process of identifying risks and impacts, the client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. This disadvantaged or vulnerable status may stem from an individual's or group's race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. The client should also consider factors such as gender, age, ethnicity, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.*
>
> *Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.*"

12.1. Project-affected Households

The RAP surveys were designed to identify and assess the vulnerabilities of individuals within households that are physically and economically displaced. The objective was to provide input for both resettlement planning and overall Project design.

Vulnerability Criteria relevant to the Project

The vulnerability criteria established for the Project, in alignment with IFC PS1, are detailed in Table 12-1.

These criteria guided the design of the RAP surveys conducted in May 2025. During the administration of household livelihood and physical displacement questionnaires, specific vulnerabilities of household members were identified based on each defined criterion.

Based on the survey results, the relevance of each vulnerability criterion to the Project was reviewed and assessed. A summary of these findings is presented in Table 12-1. It is important to note that several individuals experience multiple vulnerabilities – for example, an elderly person with both a physical disability and a chronic illness. As a result, the same individual may be counted under more than one criterion in Table 12-1.

Table 12-1. Relevance of Vulnerability Criteria to the Project for Economically and Physically Displaced Households within RAP Survey Sample

Criterion	Specific Vulnerabilities	Relevance of Vulnerability Criteria to People Affected by Land Acquisition		Count of Individuals within Households with Respective Specific Vulnerabilities	
		Relevant	Not Relevant	Physically displaced HHs	Economically displaced HHs
Sex, gender	• Female head of household	X		5 female	9 female
	• Single man taking care of children		X	0	0
Children	• Children with special needs	X		1 male	2 male
	• Children of school age who do not attend school		X	0	1 male
Age	• Advance old age (over 75)	X		9 female 5 male	19 female 22 male
	• Elderly people (over 65) in need of care	X		5 female 3 male	16 female 9 male
Health	• Physically disabled	X		9 female 5 male	12 female 13 male
	• Mentally disabled/mental issues	X		1 female 2 male	3 female 3 female
	• People with **chronic** diseases (heart, diabetes, blood pressure, kidney)	X		38 female 27 male	84 female 90 male

Criterion	Specific Vulnerabilities	Relevance of Vulnerability Criteria to People Affected by Land Acquisition		Count of Individuals within Households with Respective Specific Vulnerabilities	
		Relevant	Not Relevant	Physically displaced HHs	Economically displaced HHs
	• People with **other significant** health issues (cancer, Alzheimer)	X		4 female 4 male	5 female 5 female
Literacy	• Illiterate persons	X		9 female	24 female 3 male
Economic	• Economically displaced households who **reported** losing more than 20 percent of their Total Productive Area	X		45 households	95 households
	• Low-income households (total income lower than applicable minimum wage[108])	X		20 households	46 households
	• People with green card[109] or receiving governmental aid	X		1 female 1 male	1 female 1 male
	• Household members employed without social security	X		3 male	1 male
	• Unemployed household members actively seeking work	X		2 male	2 female 1 male
	• Landless	X		19 households	47 households
Race, colour, birth, ethnicity; Language; Religion; Political or Other Opinion; National or Social Origin; Culture	• Migrant households		X	0	0
	• Migrant seasonal agricultural workers	X		These are not household members, mainly working at the greenhouses.	These are not household members, mainly working at the greenhouses.
Dependence on unique natural resources	• Dependent on water resources, • Dependent on grazing lands • Dependent on forest		X	0	0
Others	• Owners/users affected impacted by past expropriations and cumulative land acquisition impacts.	X		1 household	10 households
Total number of vulnerable individuals within affected households				**87 individuals in 99 households** • 47 female • 40 male	**326 individuals in 195 households** • 176 female • 150 male

Number of households with vulnerable members among the economically displaced and physically displaced households and households that do not actively use the land are summarised in Table 12-2.

Table 12-2. Number of Households with Vulnerable Members by Displacement Category within RAP Survey Sample

Displacement Category of Interviewed Households	Total Number of Households within RAP Survey Sample	Number of Households with		
		No vulnerable members	Single vulnerable member	Multiple vulnerable members
Physically displaced households	99	46	26	27
Economically displaced households	217	22	45	150
Total	**316**	**68**	**71**	**177**

[108] The net minimum wage applicable in Türkiye for the period **1 January 2025 to 31 December 2025** is **22,104.67 TRY**, while the gross minimum wage is **26,005.50 TRY**.

[109] A health card is provided in accordance with the **National Regulation on the State Coverage of Healthcare Expenses for Citizens Who Cannot Afford to Pay and the Green Card System**. The **type and content** of the card are determined based on the provisions of this Regulation.

Affected Vulnerable Individuals Database

During the RAP field surveys conducted in May 2025, interviews were carried out with vulnerable households, and data on vulnerable members within the affected households was collected. This information is being incorporated into an **Affected Vulnerable Individuals Database**, which will be maintained by the SPV throughout the duration of the Project.

It should be noted that, as indicated by IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), identifying vulnerable individuals and households in a resettlement context is an iterative process and vulnerability is also a dynamic condition, as such, households can become more or less vulnerable due to resettlement processes and external factors not related to the Project.

The following section presents a summary of key vulnerabilities identified, along with the perceptions shared by affected households during the surveys. These examples illustrate potential vulnerability cases that may be encountered during Project implementation and provide an overview of the support mechanisms to be established and implemented for all vulnerable individuals affected by land acquisition.

Each case exhibits both common characteristics and unique circumstances. Therefore, the SPV – RAP Implementation Team will assess each situation on a case-by-case basis and determine appropriate support measures tailored to the specific needs of each vulnerable household.

Some of the more sensitive vulnerability cases are summarised below:

- **Deniztepesi, Serik:** A house and greenhouse are located on a privately owned parcel held in collective ownership, which will be affected by the Project. A low-income family of three resides in the house: an elderly mother (over 90 years old) with serious physical limitations and chronic illnesses, her middle-aged single son, and single daughter. The household does not own alternative land, as confirmed by the Mukhtar of Deniztepesi.

  The household will receive compensation from KGM for their shares (land, house, greenhouse and other structures), and the SPV will provide a top-up payment from the RAP Fund to ensure full replacement cost is met. Although the parcel is only partially acquired, a portion of the land will remain outside the expropriation corridor. However, the use of this remaining land to construct a new house depends on obtaining consent from the other co-owners – relatives of the household – who may not readily grant permission. The residual land may be sufficient for a small garden, but it may not be suitable for rebuilding the existing greenhouse.

  The Mukhtar has confirmed that local opinion leaders are willing to support the household in securing the necessary consent. Additionally, the security of tenure may be formalised through the upcoming land consolidation process. In coordination with the Mukhtar, the SPV will support the household in designating the unacquired portion of the parcel for house reconstruction, ensuring the new structure meets or exceeds existing standards, and planning a timely relocation. Temporary health care support will also be provided to address the needs of the vulnerable elderly woman during this transition.

  The male household member is informally employed in irregular daily wage jobs, likely without social security coverage. He possesses welding skills but lacks formal certification. He has expressed interest in working on the Project. The SPV will consider enrolling him in vocational training for welding certification and, subject to eligibility according to Project's employment qualification criteria, offer employment under the Project to support the households' livelihood. During RAP implementation, the possibility of identifying alternative land for rebuilding the greenhouse will also be explored.

- **Sarıabali, Serik:** Households with affected houses, greenhouses, and agricultural land located on Treasury land are considered informal users, as they have neither formally leased these lands from the state nor paid the required informal use penalty (ecrimisil). These households will receive compensation from KGM at **minimum material cost**, in accordance with the Expropriation Law.

  The members of these households are predominantly elderly men and women. Some household heads are widowed women, and many elderly individuals experience multiple vulnerabilities, including chronic illnesses. While some of these households have alternative places to move to, others – particularly widowed women—do not own any alternative land.

Although the houses and structures of these households will be compensated by the SPV through the RAP Fund, the land itself will not be eligible for compensation. Therefore, it is essential for the Project to coordinate with the relevant authorities to facilitate the designation of appropriate land for resettlement – ensuring that displaced households can relocate with **security of tenure**.

- **Turkler, Manavgat**: The households with affected houses, greenhouses, and agricultural land located on forest land are informal users (since 1990s) and will not receive compensation from KGM, as they are occupying forest areas illegally. Among these individuals, some are elderly and/or experience multiple vulnerabilities, including chronic illnesses.

  A portion of these households previously acquired forest land through the 2B regulation and formalised their land use. However, these lands also fall within the Motorway's expropriation corridor, leading to cumulative land acquisition impacts. While some of the affected households possess alternative land parcels, others do not own any land.

  While the houses and structures of these households will be compensated by the SPV through the RAP Fund, the land itself will not be compensated. Therefore, it is critical for the Project to engage with the relevant authorities to facilitate designation of appropriate land for resettlement – ensuring that affected households with no alternative land ownership are able to resettle with **security of tenure**.

- **Hacıobası, Manavgat:** The male head of household resides with his spouse in a residence directly affected by the Project. In addition to the residential impact, his rented commercial shop located along the existing state road (D100 Highway) also falls within the Project's expropriation corridor. Furthermore, an olive grove parcel adjacent to their home, which is used for agricultural purposes, is affected. This household does not fall under any vulnerability category, other than cumulative impacts

  However, directly across from their affected residence lives their extended family, comprising the male head of household's disabled brother, the brother's disabled spouse, and their disabled sister. While this second household is not physically impacted by expropriation, they are functionally and economically dependent on the physically displaced household. As such, they will be indirectly affected by the Project. Despite residing in separate dwellings, the two households operate as a shared economic unit.

- **Emisbeleni, Alanya:** An elderly single woman with existing health conditions resides in an apartment that will be affected by the Project. She will receive compensation from KGM, and the SPV will provide a top-up payment from the RAP Fund to ensure that the total compensation meets full replacement cost.

  However, regardless of her compensation and current economic situation, she is likely to require additional support to identify a suitable new residence, arrange relocation logistics, and physically move – tasks she cannot manage on her own due to her prevailing health and social conditions.

  Therefore, beyond providing cash compensation, the SPV will support this individual by helping her identify a relocation site, arranging necessary logistics, and offering any other relevant assistance to ensure she can successfully and safely resettle.

- **Migrant Workers Employed in Greenhouses in Serik, Manavgat and Alanya:** Interviewed greenhouse owners confirmed that they employ migrant workers – primarily of Afghan origin – particularly in greenhouses larger than approximately 5 decares. Given the extensive greenhouse market in the Antalya region, as confirmed by the mukhtars, greenhouse operators and district directorates of Agriculture, these workers are expected to be able to find alternative employment in other greenhouses, even if the greenhouses where they are currently employed are fully affected by the Project.

  During RAP implementation, the SPV – RAP Implementation Team, in coordination with local mukhtars, will engage with these workers and, if necessary, develop case-specific measures – such as supporting them in finding alternative employment opportunities.

A comprehensive **vulnerability matrix** for **physically displaced households** within the RAP survey sample is presented in Table 12-3.

The vulnerability matrix for **economically displaced households** within the RAP survey sample is presented in Appendix I.

Table 12-3. Vulnerability Matrix for Physically Displaced Households within the RAP Survey Sample

No.	District	Settlement	Parcel No	Individual Vulnerabilities																						Number of different vulnerable individuals within the HH			Household-level Vulnerability								
				Children		Advance Old Age (over 75)		Elderly (over 65) in need of care		Illiterate		Chronic Disease (Heart, Diabetes, Blood Pressure, Kidney, etc.)		Other Singificant Health Issues (Cancer, Alzheimer, etc.)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)		Green card holder		Beneficiary of governmental aid		Employed without social security					Economically Displaced HH	Women-headed HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	Migrant HH	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male								
1	Serik	Deniztepesi	139/8					X				X X	X														X	3	2	1	x							
2	Serik	Sarıabalı	116/10																									0	0	0	x						65%		1
3	Serik	Sarıabalı	134/15			X				X		X												X			X	2	1	1								x (DSI pipeline)	
4	Serik	Sarıabalı	164/25									X																1	1	0	x			x			70%		1
5	Serik	Sarıabalı	164/32				X	X					X															2	1	1	x						70%		1
6	Serik	Sarıabalı	164/33										X															1	0	1				x			100%		
7	Serik	Sarıabalı	248/2																									0	0	0	x						50%		4
8	Serik	Sarıabalı	249/5									X																1	1	0	x	x	x	x			100%		
9	Serik	Sarıabalı	282/5			X				X X		X X																2	2	0	x						50%		6
10	Serik	Sarıabalı	288/1									X	X															2	1	1									
11	Serik	Sarıabalı	288/4										X															1	0	1	x		x						
12	Serik	Sarıabalı	302/1			X				X		X												X				1	1	0		x	x	x			100%		1
13	Serik	Sarıabalı	302/1									X	X								X X							4	1	3	x		x	x			100%		1
14	Serik	Aşağıçatma	102/27																									0	0	0	x						30%		
15	Serik	Aşağıçatma	102/27									X																1	1	0	x								
16	Serik	Üründü	133/30						X				X		X													1	0	1	x						21%		1
17	Serik	Üründü	135/3																									0	0	0	x						75%		1
18	Serik	Cumalı	200/25																									0	0	0	x						50%		1
19	Manavgat	Taşağıl	515/415	X (24)								X	X		X		X (24)											3	1	2	x						38%		1
20	Manavat	Taşağıl	549/2										X															1	0	1	x			x			100%		1
21	Manavgat	Taşağıl	549/2				X										X											1	0	1							50%		1
22	Manavgat	Taşağıl	549/2																										0	0	x						80%		1
23	Manavgat	Taşağıl	549/2																									0	0	0	x						40%		1
24	Manavgat	Taşağıl	549/2																									0	0	0	x		x				100%		1
25	Manavgat	Taşağıl	549/2																									0	0	0	x		x				100%		
26	Manavgat	Taşağıl	549/2			X				X		X												X				1	1	0	x			x					
27	Manavgat	Taşağıl	910/1																									0	0	0	x						50%		
28	Alanya	Çakallar	137/2			X								X														1	1	0				x			20%		
29	Alanya	Çakallar	143/5											X										X				1	1	0				x					
30	Manavgat	Çakış	128/174	X (11)																								1	0	1									
31	Manavgat	Çakış	128/172																								X	1	0	1	x			x	x		80%		2
32	Manavgat	Çakış	150/4										X X															2	0	2							29%		1
33	Manavgat	Çakış	150/6																									0	0	0	x			x			50%		2
34	Manavgat	Hacıobası	104/59																									0	0	0	x						50%		2
35	Manavgat	Karakaya	130/4									X	X															2	1	1	x			x					
36	Manavgat	Karakaya	130/4																									0	0	0	x			x					x
37	Manavgat	Karakaya	133/2					X		X		X				X								X				1	1	0	x	x		x					
38	Manavgat	Yukarıışıklar	156/12					X	X			X	X			X	X		X									2	1	1	x			x					
39	Manavgat	Yavrudoğan	138/1527																X					X		X		3	1	2				x					
40	Manavgat	Çolaklı	884/1									X																1	1	0									
41	Manavgat	Çolaklı	959/25									X	X															2	1	1	x						100%		
42	Manavgat	Kalemler	136/6									X	X				X								X			2	1	1	x						20%		
43	Manavgat	Seki	839/1										X															1	0	1	x								
44	Manavgat	Uzunlar	185/5																									0	0	0	x		x				100%		1
45	Manavgat	Uzunlar	200/14											X (Cancer)														1	1	0	x		x				100%		
46	Alanya	Alara	113/344					X				X																1	1	0	x			x			24%		2

No.	District	Settlement	Parcel No	Individual Vulnerabilities																						Number of different vulnerable individuals within the HH			Household-level Vulnerability							
				Children		Advance Old Age (over 75)		Elderly (over 65) in need of care		Illiterate		Chronic Disease (Heart, Diabetes, Blood Pressure, Kidney, etc.)		Other Singificant Health Issues (Cancer, Alzheimer, etc.)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)		Green card holder		Beneficiary of governmental aid		Employed without social security					Economically Displaced HH	Women-headed HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	Migrant HH	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male							
47	Alanya	Alara	113/353									X	X															0	0	0	x					x		
48	Alanya	Alara	156/63									X X																3	2	1	x							2
49	Alanya	Alara	158/15										X															1	0	1			x	x				
50	Alanya	Alara	195/1													X X												2	2	0						20%		2
51	Alanya	Avsallar	496/1			X	X		X			X				X	X	X										2	1	1	x							
52	Alanya	Türkler	360/1									X	X															2	1	1	x		x	x		80%		2
53	Alanya	Emişbeleni	203/20				X (90)			X					X Alzheimer		X					X	X	X	X			2	1	1		x		x				
54	Alanya	Emişbeleni	213/4													X (home-bound)												1	1	0	x					40%		
55	Alanya	Emişbeleni	213/4							X		X X				X												2	1	1	x							
56	Alanya	Emişbeleni	216/4									X																1	1	0	x		x			100%		1
57	Manavgat	Emişbeleni	216/4			X						X X				X												2	2	0	x		x	x				
58	Alanya	Emişbeleni	216/4																									0	0	0			x	x				
59	Alanya	Emişbeleni	216/4									X																1	1	0	x							
60	Alanya	Toslak	251/46							X					X													2	1	1	x							
61	Alanya	Toslak	253/3																									0	0	0	x							2
62	Alanya	Toslak	247/10										X															1	0	1								
63	Alanya	Toslak	247/26									X	X	X														2	1	1	x					23%		1
64	Alanya	Toslak	251/47																									0	0	0	x		x			100%		1
65	Alanya	Toslak	251/48																									0	0	0	x					84%		5
66	Alanya	Toslak	251/48																									0	0	0	x					84%		5
67	Alanya	Toslak	251/48				X																					0	0	0	x					84%		
68	Alanya	Toslak	382/1									X	X															2	1	1	x		x			90%		
69	Alanya	Toslak	382/1			X						X X	X															3	2	1	x		x			85%		
70	Alanya	Telatiye (Konaklı)	KGM-Yol2					X				X																1	1	0		x	x					
71	Alanya	Telatiye (Konaklı)	121/1									X	X															2	1	1								
72	Alanya	Telatiye (Konaklı)	135/5									X	X															2	1	1	x			x		100%		
73	Alanya	Telatiye (Konaklı)	135/5																									0	0	0	x		x			100%		
74	Alanya	Telatiye (Konaklı)	528/1										X															1	0	1	x					14%		1
75	Alanya	Elikesik	178/51									X	X															2	1	1	x							
Total																												**87**	**47**	**40**								

12.2. Project-affected Businesses

Employees with vulnerabilities were identified through interviews conducted with affected business operators during the May 2025 RAP surveys. The number of vulnerable employees is summarised in Table 12-4.

During RAP implementation, the SPV will update data on both formal and informal employees working at affected businesses. This will be based on a review of relevant employment documentation (e.g., insurance records) and consultations with informal employees, business owners, other workers, and trusted community sources, as appropriate.

Table 12-4. Number of Potentially Vulnerable Employees in Affected Businesses

District	Settlement	Parcel No.	Activity	Vulnerable Employees																Total Number of Vulnerable Employee	
				Physically Disabled / Handicapped Employee		Chronically ill Employee		Migrant		Migrant –		Non-migrant (national)–		Children		Elderly people in need of care		Women Employees with Vulnerabilities	Employees with Vulnerable Household Members	Employees affected by 2023 Earthquake			
								Declared to be Informally Employed[1]		Declared to be Formally Employed		Declared to be Informally Employed		(15-18 ages)		(over 65)		(e.g. single women with children, etc.)					
				Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male			Female	Male	Female	Male
(A) Businesses to be relocated																							
Serik	Aşağıçatma	102/49	Production (plastic fruit crate)						2														2
Manavgat	Evren	764/11	Retail store								2												2
Manavgat	Evren	762/1	Workshop (marble)			1																1	
Alanya	Emişbeleni	144/3	Livestock fattening farm (“*besihane*”)						2														2
Alanya	Toslak	326/66	Retail milk production and store						1														1
Alanya	Telatiye (Konaklı)	121/1	Retail store				1																1
Total – vulnerability categories (Gender-aggregated)						1	1		5		2											**1**	**8**
Total (A)																						**9**	
(B) Business owners who will not be relocated but may experience partial loss of land and/or assets																							
Manavgat	Çakış	128/4	Gas station						3														3
Alanya	Emişbeleni	231/1	Vegetable retail store						1														1
Alanya	Telatiye (Konaklı)	306/1	Production (irrigation pipes)																	1	2	1	2
Total – vulnerability categories (Gender-aggregated)									4											1	2	**1**	**6**
Total (B)																						**7**	

Source: RAP Surveys, May 2025.

12.3. Support for Vulnerable People during RAP Implementation

Field observations and community consultations indicated that elderly individuals constitute a significant portion of the Project-affected population. Within this demographic, **chronic health conditions** such as hypertension, diabetes, and high cholesterol are widespread. However, these conditions are often underreported by elderly individuals themselves, as they tend to perceive such ailments as a natural and universal part of aging. As a result, many do not self-identify as vulnerable or in need of support, even when their health status suggests otherwise.

This phenomenon – where chronic illness becomes internalised or normalised within older age groups – suggests that vulnerability assessments based solely on age may lead to underestimation of actual needs. In contrast, chronic conditions observed in children and younger adults are typically perceived as more disruptive and less anticipated, making them potentially more urgent in terms of intervention and support.

Although a general age threshold of 65 plus is commonly used to define elderly status, our findings suggest this threshold may no longer adequately reflect functional dependency. Many individuals aged 65–74 remain physically active and engaged in agricultural activities, and they express a desire to continue contributing economically or to pass down farming responsibilities to their children. Therefore, a revised age categorisation was adopted in this RAP in accordance with the evolving international standards, distinguishing:

- 65 – 74 years: **Elderly**
- 75 years and above: **Advanced old age**

This stratification allows for a more nuanced understanding of vulnerability. Physical capacity and the ability to perform self-care emerged as more accurate indicators than chronological age alone.

Accordingly, the RAP commits to introduction of a vulnerability scoring approach where elderly individuals are not automatically classified as **highly vulnerable**. Instead, those with moderate to high levels of functional limitation – regardless of age – will be prioritised for enhanced support. Those with low vulnerability (i.e. who remain physically capable and economically active despite chronic health conditions) may still be eligible for general assistance, but not necessarily for targeted or intensive support packages.

This approach will ensure that support mechanisms are responsive to actual needs rather than assumptions based on demographic categories alone. It also avoids the inefficiency of offering land return or intensive compensation to individuals who, by their own assessment, are no longer willing or able to continue farming.

Accordingly, during the RAP implementation period:

- The SPV will continue to engage with affected individuals and households and will regularly update the **Affected Vulnerable Individuals** Database by adding newly identified vulnerable persons and households, in accordance with the criteria listed in Table 12-1.
- The SPV will consult with affected people to assess each household and validate vulnerabilities declared during the RAP surveys as part of a **vulnerability analysis** study, based on a **vulnerability scoring approach**. This is to determine the support needed and design household specific support packages (in-kind or cash). During the consultations, the SPV will request and review any supporting documentation (e.g., income and expenditure quintiles, documentation on total productive area of households) to verify declarations of affected people. As needed, the SPV will also consult with the relevant governmental officers, NGOs, and community representatives such as mukhtars and community representatives and involve them in the process.
- Based on the outcomes of ongoing field surveys, the SPV will revise the vulnerability criteria defined in this RAP if necessary, and in coordination with its implementation partners, will finalise the list of households eligible for entitlements specific to vulnerable groups. A vulnerability analysis will be carried out to assess each case individually, and tailored support packages will be developed based on the specific vulnerabilities and needs of each affected household or individual.
- Support to vulnerable individuals and households will begin concurrently with the RAP implementation and will be delivered on a continuous basis throughout the **36-month** RAP implementation period. During delivery of assistance, the SPV – RAP Implementation Team will monitor the vulnerable individuals' or households' progress, adjust assistance where necessary, or agreed with the participant when vulnerable assistance is no longer needed.

12.3.1. Support for Vulnerable Households

For households with vulnerable members, case-specific in-kind assistance and measures, which will be designed through direct engagement with the affected households in consideration of their special needs, will be provided.

The following general support mechanisms will be offered to **physically and economically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

- Enhanced Communication and Consultation: Special attention will be given during information dissemination, consultation, negotiation, and post-resettlement monitoring. Customised methods and tools will be developed and implemented to address the specific needs of each vulnerable affected person, in accordance with the Project's SEP. The SPV – RAP Implementation Team will ensure that vulnerable individuals and groups are specifically informed about the land acquisition process, the RAP, and the grievance mechanism, and supported to understand and sign household agreements.

- Assistance with Compensation Procedures: Support will be offered to assist vulnerable affected people in tracking and/or accessing their compensation payments throughout the RAP implementation.

- Institutional Access and Legal Assistance: Vulnerable individuals will receive help accessing governmental institutions and legal services when needed. This may include logistical support, communication assistance, and help with preparing required official documents, completion of inheritance procedures, etc.

- Support for Administrative Processes: Illiterate individuals, the elderly, and others requiring support will be assisted in reviewing and processing documents related to expropriation and compensation.

- Access to Government Programs: Support will be provided to help vulnerable individuals access and apply to existing governmental support programs designed for people with special needs or disadvantages.

- Employment Opportunities: Priority will be given to one eligible and capable household member from vulnerable physically displaced households and economically displaced households who are significantly[110] affected by Project-related land acquisition for employment opportunities created by the Project, provided they meet the employment criteria.

The following specific support mechanisms will be offered to **physically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

- Modifications to Replacement Housing for Persons with Disabilities: Replacement housing provided to or found by physically displaced households with members who have disabilities will be customised as needed to ensure accessibility, safety, and comfort. Modifications may include the installation of ramps, handrails, accessible bathroom facilities, or other design adaptations based on individual requirements identified during consultations.

- Provision of Food Packages: Low-income will be supported through the periodic distribution of food packages during relocation process, especially immediately following displacement or during the early phases of RAP implementation.

- Access to Health Care Services: The Project will facilitate access to essential health care services for vulnerable individuals, particularly the elderly, chronically ill, persons with disabilities, and those without regular access to medical facilities. This may include support in scheduling appointments, covering transport to health care providers, or connecting with available public health programs.

- Access to a Nearby Garden Area: Where feasible, the Project will support the allocation or development of accessible garden areas near resettlement sites or host communities. These areas will offer opportunities for small-scale gardening activities, supporting both food security and psychosocial well-being, particularly for elderly or economically disadvantaged individuals.

- Opportunities for Project Employment: Vulnerable individuals, or eligible members of vulnerable households, will be given priority consideration for employment opportunities generated by the Project. Employment will be contingent upon meeting relevant job requirements, and the RAP Implementation Team will assist in identifying suitable roles, supporting applications, and providing any necessary orientation or training.

Table 12-5 provides a summary of the support and assistance provided to affected households with vulnerable members.

[110] Economically displaced households who lose more than 20 percent of their Total Productive Area.

Table 12-5. Support and Assistance for Affected Households with Vulnerable Members

Category	Support Framework	Description of Support	Beneficiaries
All physically and economically displaced households with vulnerable members	Priority in accessing and benefiting from livelihood restoration, improvement, and assistance measures will be ensured through the use of special information and consultation methods. Assistance will be provided in accessing support programs offered by governmental institutions or other non-governmental organisations.	In-kind support will be provided by the SPV to vulnerable households identified during RAP preparation and implementation. A preliminary list of vulnerability criteria is included in Chapter 12. Final eligibility will be confirmed through household-level assessments to be carried by the SPV during RAP implementation, with support from the external Agricultural Consultancy Company. For budgeting purposes, an estimated support value equivalent to up to **six times the national net minimum wage** per household has been considered. This support will be primarily delivered in the form of **in-kind assistance**. Vulnerable households affected by physical and/or economic displacement will be prioritised for all livelihood restoration, improvement, and assistance measures outlined in the RAP. In line with the IFC PS5 guidance on meaningful consultation, specific communication methods tailored to the needs of vulnerable groups will be used. These include targeted outreach, simplified materials, and individual-level engagement by the SPV – RAP Implementation Team. The SPV, through its Expropriation Team under the leadership of the Expropriation Manager, along with SPV and EPC CLOs and other designated personnel, will provide the following support: • **Information and Notification**: Timely updates regarding expropriation status and court decisions, based on notifications received from KGM, will be provided to vulnerable PAPs; • **Orphan Land Cases**: Assistance with applications to KGM for acquisition of remaining, unusable land parcels (orphan lands), including help with documentation, communication, and logistics; • **Access to Compensation**: Support in completing legal and administrative procedures to enable timely access to expropriation payments – particularly in cases requiring notarial work, inheritance documentation, or coordination with relevant institutions; • **Legal and Institutional Navigation**: Facilitation of access to legal advice and public institutions, including assistance with preparing and submitting required documentation; • **Access to Government and NGO Support Programs**: Assistance in identifying and applying to existing government or third-party support programs targeting vulnerable individuals or households. This approach ensures that livelihood restoration and compensation measures are equitably implemented and that no individual or group is disadvantaged in accessing their entitlements, in compliance with IFC PS5.	Beneficiary individuals or households will be determined by the SPV – RAP Implementation Team, during the RAP implementation phase.
Physically displaced households with vulnerable members	Soft support for relocation	The SPV, through its CLOs and other appropriate in-house personnel, will provide logistical and administrative support to facilitate key processes. This includes 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 households.	Beneficiary individuals or households will be determined by the SPV – RAP Implementation Team, during the RAP implementation phase

Category	Support Framework	Description of Support	Beneficiaries
including disabled member, chronic diseases, children, home-bound elderly, and other vulnerability categories as required		• 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.) Support will cover the preparation of necessary documentation and other logistical needs during the relocation process.	
Gender related vulnerabilities	Gender-Inclusive and Vulnerability-Focused Measures to Support Women's Livelihood Activities	The entitlements provided under this RAP by the SPV will be extended to include both female and male spouses within affected households. Where needed or requested, the SPV site teams will provide support to individuals in opening bank accounts to facilitate direct access to compensation and support payments. Unemployed female members of physically and/or economically displaced households who are actively seeking employment will be given priority for job opportunities within the Project—during both the construction and operation phases—subject to their qualifications and skills. The SPV and EPC CLOs will ensure that eligible women are informed about available positions relevant to their experience and capabilities. Training programmes to be designed and delivered by the external Business Consultancy and Agricultural Consultancy Companies will consider alternative, sustainable livelihood options tailored to the needs of female and other vulnerable members of the affected households. This includes, for example, unemployed high school and university graduates, and women interested in pursuing formal (insured) employment. During the RAP field surveys conducted in May 2025, interviews were carried out with vulnerable households, and data on vulnerable members within the affected households was collected. **This information is being incorporated into an Affected Vulnerable Individuals Database, which will be maintained by the SPV throughout the duration of the Project.** Support to vulnerable households and women under the RAP will be complemented through initiatives under the Community Development Plan (CDP), which will be developed and implemented by the SPV (see Section 8.3). Provide registration support for women in the ÇKS or equivalent systems. Offer assistance packages specifically for women during relocation, such as: Home reorganization or cleaning support Start-up kits for household needs Access to child or elder care to reduce domestic burden	Beneficiary individuals or households will be identified by the SPV – RAP Implementation Team during the RAP implementation phase. This process will include the identification of women agricultural users, as well as female members of physically or economically displaced households who are considered vulnerable.

12.3.2. Support for Project-affected Businesses

RAP surveys have aimed to make a preliminary identification of vulnerable employees working at affected businesses. A more detailed assessment will be carried out by the SPV, with support from the Business Consultant, to identify vulnerable individuals within these businesses. Special support measures for these employees – including those who may lose their jobs due to relocation-related reasons beyond their control – will be determined and managed on a case-by-case basis during RAP implementation.

These measures will be informed through further engagement with the affected individuals during RAP implementation. Importantly, support for vulnerable workers will be provided under the RAP irrespective of the formality of their employment arrangements.

Table 12-5 provides a summary of the special assistance for vulnerable employees of the affected businesses.

Table 12-6. Special Assistance for Vulnerable Employees of the Affected Businesses

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Measure	**Special assistance to be identified on a case-by-case basis**
Level of Support	Employee-level
Number of Employees with Vulnerabilities and Vulnerable Members within their Households	9 employees with vulnerabilities: ○ 8 female ○ 1 male employees If additional vulnerable employees are identified during RAP implementation, they will also be eligible for livelihood restoration, improvement, and/or assistance measures.
Description of the Package	Special support measures for vulnerable employees, as well as employees with vulnerable household members, will be determined and provided on a case-by-case basis. All vulnerable workers will receive support under the RAP, regardless of whether their employment is formal or informal. - **Informal employees with vulnerabilities** (e.g. persons with disabilities, uninsured national or migrant workers) who are employed at the business at the time of early consultations and land acquisition notifications and are dismissed due to relocation (to be verified through SPV monitoring) will be compensated with **three months of gross salary**. In cases where other informal and vulnerable employees are working at the business at the time of relocation, the **external Business Consultant** will assess their situation **on a case-by-case basis** and recommend mitigation measures to be implemented by the SPV to address any disproportionate impacts. - Informal employees will also be given the opportunity to **consult with the Business Consultant** engaged by the SPV regarding: • **Alternative job opportunities** in the region that align with their skills, • **Support in finding replacement employment**, and • **Opportunities to formalise their employment**, where applicable under national legislation. Additional special measures will be developed and implemented on a case-by-case basis, as needed, depending on the specific circumstances of the affected employee(s). The SPV, through its legal department or legal counsel, will advise migrant workers without valid work or residence permits on the procedures required to regularize their residency and employment status in Türkiye.
Timetable	Throughout the RAP implementation period.

13. Monitoring

Monitoring as part of RAP implementation will aim to track the progress of RAP implementation; sssess whether the outcomes align with RAP objectives and identify any obstacles to their achievement; and identify areas needing improvement and propose corrective actions for any deviations from RAP objectives.

Monitoring will be conducted both **internally** and **externally**, as outlined below:

- **Internal monitoring** of the RAP implementation will be conducted by the RAP Implementation Team, with support from third-party implementation partners and consultants to be contracted by the SPV, as necessary. This will look at resettlement progress and performance, as a component of the Project ESMS as mandated by IFC PS1.
- **External monitoring** will include (i) monitoring by IESC as part of their post-signing E&S monitoring covering IFC PS5, (ii) regular compliance reviews throughout the RAP implementation period until RAP Completion Audit, and (iii) RAP completion audit.

Further details on the internal and external monitoring components are provided in the following sections of this Chapter. The monitoring and reporting framework for RAP implementation, including monitoring indicators for internal monitoring, is presented in Table 13-1.

Based on the findings from internal and external monitoring activities, the RAP will be reviewed and updated as necessary, through addenda documents or change management reports.

The process to be followed in the event of potential additional expropriation works and change management are discussed in Section 3.4.

13.1. Internal RAP Monitoring

The internal monitoring by the SPV – RAP Implementation Team will begin following the approval of RAP by Lenders. It will be conducted to assess ongoing activities and progress including the following objectives aligned with IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023):

- Actions and commitments defined in the RAP are implemented fully and delivered on time.
- RAP actions and compensation measures are effective in helping affected persons in restoring their homes and in sustaining/improving pre-project living standards.
- Complaints and grievances are being followed up with appropriate corrective actions and tracking of outcomes.
- PAPs are informed about Project impacts and mitigations and have a say in the design of mitigation measures.
- Vulnerable persons are tracked and assisted as necessary.
- Recurrent or systemic problems that require correction are identified and fixed.

Monitoring Indicators

The internal monitoring indicators for internal monitoring, tailored to the nature and scope of displacement impacts, is presented in Table 13-1. Some of the indicators will be used as **key performance indicators (KPIs)**, as identified in the last column of the table.

Monitoring Methods

The internal monitoring by the SPV – RAP Implementation Team

- Review of expropriation and RAP implementation data (expropriation tracker, grievance logs, compensation records, human resources records, financial records, etc.) compiled by various Project teams
- Review of RAP Grievance Database
- Consultations with the KGM and other Project stakeholders
- Surveys conducted by qualified surveyors over a stratified sample of affected households (such as physically and economically displaced households), and comparison of monitoring data with baseline conditions

- Surveys conducted by qualified surveyors with relocated businesses and their employees, and comparison of monitoring data with baseline conditions
- Qualitative interviews in focus groups

Monitoring Frequency

The internal monitoring frequency for specific indicators will be as follows:

- During RAP implementation: **Monthly, Quarterly or Yearly** (see Table 13-1)
- Post-implementation, until RAP Completion Audit: **Bi-annually for two years after the completion of RAP implementation period**[111] – hence completion of all RAP actions.

Internal RAP Monitoring Reports

The SPV – RAP Implementation Team will prepare periodic **Internal RAP Monitoring Reports,** incorporating the findings of ongoing monitoring activities.

The reporting frequency will be as follows:

- During RAP implementation: **Quarterly**
- Post-implementation, until RAP Completion Audit: **Bi-annually**

The Corporate Senior Management representatives and SPV Senior Management will be provided with copies of the internal RAP Monitoring Reports, including an **Executive Summary.**

Using the relevant monitoring indicators, the Internal RAP Monitoring Report will provide information on the following aspects for the respective reporting period:

- **Project status,** progress with the construction of main features of the Project including the Motorway, engineering structures and temporary facilities, infrastructure displacement works, as well as any changes to the Project introduced during the reporting period;
- **Overview of land acquisition progress**, based on data from KGM on expropriated parcels and structures, status of agreement protocols (for shares and parcels), status of compensation payments by KGM, court cases (Article 27 and Article 8), status of title deed registry, expropriation decisions, etc.
- **Overview of RAP implementation progress**, detailing key activities carried out during the reporting period according to RAP entitlement matrix, including status of compensation payments by SPV from RAP fund, relocation of affected houses, businesses and other structures, resettlement sites, gender integration in RAP implementation, key observations, and any challenges encountered; etc.
- **Livelihood restoration and assistance activities**, including status of implemented measures; progress on livelihood/income restoration for economically displaced persons; evaluation of the adequacy and appropriateness of ongoing or planned livelihood support programs;
- **Stakeholder engagement and information disclosure**, detailing types of consultations, locations, and number of participants, photographic records, press/media coverage; key issues or concerns raised, along with responses and action plans;
- **Grievance management mechanism,** with an assessment of functionality of the grievance mechanism, including number and types of complaints received, separate tracking of grievances submitted by vulnerable or disadvantaged individuals/groups;
- **Vulnerable people,** including measures taken to protected affected vulnerable persons and groups, addressing of gender-specific vulnerabilities, etc.;
- **Capacity,** including staffing with composition of implementation team, services from third-party implementation partners and consultants, etc. summary of the adequacy, readiness, and competency of the human resources involved;
- **Budget**, with allocation and disbursement of RAP fund, in line with the RAP and implementation schedule;
- **Key findings** of the reporting period, including any non-conformities identified and proposed time-bound Corrective Action Plan.

[111] The RAP implementation period will be considered complete only after a

Table 13-1. Framework of Internal RAP Monitoring

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implentation)	KPI?
A.	**Internal Monitoring**			
	Expropriation and Compensation			
7.	Overall spending by KGM from expropriation budget	Expropriation tracker	Monthly	Yes
8.	Number of agreement protocols signed with affected owners/shareholders, disaggregated by settlement and gender etc.	Expropriation tracker	Monthly	Yes
9.	Number of expropriated parcels and shares, disaggregated by settlement and registry type	Expropriation tracker	Monthly	Yes
10.	Number of court cases opened and concluded in this reporting period, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	Yes
11.	Number of ongoing court cases and trends over time, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	No
12.	New accelerated expropriation decision(s) issued for the Project	Official gazette	Monthly	No
13.	New expropriation decision(s) taken by KGM for the Project	Official correspondence	Monthly	No
14.	Land seizure and final expropriation values determined by the courts through Article 27 and 10 processes	Expropriation tracker	Quarterly	No
15.	Average time for payment of compensation (after Article 8, Article 27 and Article 10)	Expropriation tracker	Monthly	Yes
16.	Has there been any valuation update to take account of value increases in lands, assets, trees and crops	Valuation report of KGM	Yearly	Yes
	Construction			
17.	Number of public and private parcels entered by the Project, with their land take and permitting status	Construction progress report	Monthly	Yes
18.	Number and/or location of existing infrastructure displaced due to Project, with status of displacement works	Construction progress report	Monthly	No
19.	Are there any additional underpasses, overpasses or other engineering structures requested by the stakeholder and included in the Project (if any as required)?	Construction progress report	Monthly	No
	RAP Compensation			
20.	Overall spending by SPV from RAP fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	Financial records	Monthly	Yes
21.	Number of households that received cash compensation from RAP Fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	RAP Database	Monthly	No
	Capacity			
22.	Number of full-time and part-time staff under SPV's RAP Implementation Team and EPC Contractor's organisation	HR records	Quarterly	Yes
23.	Number of third-party consultants (and their staff, where applicable) dedicated to resettlement, compensation and livelihood restoration activities	Contractual records	Quarterly	No
24.	Number of vehicles, computers, GPS units, and other equipment, as applicable	Count	Quarterly	No
	Physical Displacement – Affected Houses			
25.	Number of households relocated, with distribution by tenure, vulnerability, gender of household members	Through surveys	Monthly	Yes
26.	Number of replacement dwellings purchased, rented or construction commenced, completed and delivered (by owners, formal renters and informal users of affected houses)	Through surveys	Monthly	Yes
27.	Number of households moved into their replacement dwellings	Through surveys	Monthly	Yes
28.	Whether recipients of cash compensation were able to purchase similar properties	Through surveys	Quarterly	Yes
29.	Are relocated households satisfied with their replacement housing	Through surveys	Quarterly	No
30.	How was the received cash compensation used/invested?	Through surveys	Quarterly	No
31.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
32.	Are there construction and operation phase impacts such as loss of value, noise, etc. causing economic impacts on houses?	Through surveys	Quarterly	No
	Economic Displacement – Affected Lands and Greenhouses			
33.	Number of greenhouses relocated, with distribution by tenure, vulnerability, gender of household members	Through surveys	Monthly	Yes
34.	Have affected greenhouses been reestablished at an alternative location or continue operations on unacquired parts of expropriated lands or ceased their operations?	Through surveys	Monthly	No
35.	Number of households replacing affected land and area of replacement land actually secured by affected households	Through surveys	Quarterly	Yes

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implentation)	KPI?
36.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
37.	Number of households that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with distribution by type of training (agriculture, business, etc.)	Through surveys	Quarterly	No
38.	Are there economic losses or issues experienced by land users due to land fragmentation?	Through surveys	Quarterly	No
	Affected Businesses			
39.	Number of businesses relocated, with distribution by tenure, vulnerability	Through surveys	Monthly	Yes
40.	Have relocated businesses been successfully reestablished?	Through surveys	Quarterly	Yes
41.	Are there still any business interruptions faced by the relocated businesses?	Through surveys	Quarterly	Yes
42.	Are business incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	Yes
43.	Number of businesses that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with distribution by type of training (agriculture, business, etc.)	Through surveys	Quarterly	No
44.	Are there any businesses that ceased operations due to relocation?	Through surveys	Yearly	Yes
45.	Have business operators whose lands or structures were affected partially – but who did not require relocation – experienced any economic loss?	Through surveys	Yearly	No
46.	Are employees still employed in the relocated business?	Through surveys	Yearly	No
	Stakeholder Engagement and Grievance Management			
47.	Number of stakeholder engagement activities and affected people engaged with (number of attendees disaggregated by settlement and gender)	Stakeholder Engagement Log	Quarterly	Yes
48.	Average time for grievance processing	RAP Grievance Database	Monthly	Yes
49.	Number of open grievances (pending resolution since last reporting period), disaggregated by settlement, subject, gender and relevant Project party (KGM, SPV, EPC, etc.)	RAP Grievance Database	Monthly	Yes
50.	Number of grievances opened and closed and trends over time, disaggregated by settlement, subject, gender, and relevant Project party (KGM, SPV, EPC, etc.)	RAP Grievance Database	Monthly	No
51.	Number of gender-based violence and harassment related grievances linked to the land acquisition process	RAP Grievance Database	Monthly	Yes
52.	Number of land acquisition requests for orphan or fragmented lands received by KGM	KGM records	Quarterly	No
	Vulnerability			
53.	Number of vulnerable households assisted through RAP Fund, disaggregated by settlement and gender	Through surveys	Quarterly	Yes
54.	Have some households become vulnerable after land acquisition, are there cases of hardship or changed households circumstance?	Through surveys	Yearly	No
55.	Have some households previously identified as vulnerable improved their status?	Through surveys	Yearly	No
56.	Has special assistance been provided to vulnerable employees or employees with vulnerable household members?	Through surveys	Yearly	No
B.	**External Monitoring**			
B.1.	Periodic E&S Monitoring by IESC, including PS5			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements.		During construction: **Quarterly** During operation: **Bi-annually or annually** (to be decided by Lenders)	
B.2.	External Compliance Reviews (by Independent Resettlement Experts)			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements for compliance review.		**Yearly**	
B.3.	RAP Completion Audit (by Independent Resettlement Experts)			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements for RAP Completion Audit.		**One-off** – to be conducted two years after the completion of all RAP actions, including post-implementation monitoring.	

13.2. External RAP Monitoring

External monitoring will be carried out by independent consultants to assesses performance and compliance with IFC PS5 and other applicable standards of Lenders, (including IFC PS5).

Beyond demonstrating compliance to Lenders and other stakeholders, external monitoring will serve as an independent assessment of the resettlement process's effectiveness – particularly in determining whether affected livelihoods have been restored or improved.

In accordance with the IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), external monitoring will include the following components:

- Periodic E&S monitoring by the IESC, including assessment of compliance with IFC PS5
- External compliance reviews throughout the resettlement-planning and implementation period, which will provide unbiased advice to the RAP Implementation Team to swiftly identify and fix potential non-compliances, and
- A RAP Completion Audit meant to confirm that commitments in the RAP have been met, particularly those pertaining to livelihood restoration.

13.2.1. IESC's Periodic E&S Monitoring

As part of its post-signing scope, the IESC will conduct periodic monitoring of the Project's E&S activities and impacts to ensure compliance with Lender standards and requirements, including IFC PS 5 and other applicable land acquisition and resettlement requirements set by the Lenders.

Monitoring will be conducted on a **quarterly** basis during the **construction** phase (i.e. the 36-month period following the signing of the finance agreement between the SPV and the Lenders), which will largely coincide with the RAP implementation period. During the operational phase – which partially overlaps with the post-implementation monitoring period and concludes with the RAP Completion Audit in the early years of operations – E&S monitoring by the IESC will be conducted either **bi-annually or annually**, as determined by the Lenders prior to signing.

The outcomes of each monitoring exercise by the IESC – including progress on land acquisition and an independent assessment of the Project's RAP implementation performance – will be documented in monitoring reports prepared by the IESC and submitted to both the Lenders and the SPV.

13.2.2. External Independent Compliance Reviews

External compliance reviews will be conducted on a **yearly** basis by **independent resettlement experts** to check whether the implementation of the program complies with the RAP approved by the Lenders. The reviews will continue until the RAP Completion Audit is undertaken.

The scope of work of compliance reviews for resettlement and livelihood restoration will be in alignment with the IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) and include the following:

- General:
    - Assess overall compliance with RAP objectives and commitments as well as government and lender policies and standards on land acquisition and involuntary resettlement
    - Verify progress on the recommendations that the IESC and external compliance reviewer made during previous visits.
    - Interview a representative cross-section of affected households and businesses to gauge the extent to which the standards of living and livelihood of displaced households for men and women have been improved or restored.
    - Measure whether men and women in households have been sufficiently informed and consulted with.
    - Gather their opinions on entitlement delivery, resettlement housing, livelihood-restoration measures, and grievance management.

- Use panel surveys (visiting the same households once a year over the entire resettlement period).
- Assess the ongoing level of Project support or social license to operate in the affected groups.

- Resettlement and compensation process, delivery of entitlements:
  - Review whether entitlements were delivered and implemented on time (as set out in the RAP implementation schedule).
  - Assess whether compensation is at full replacement cost.
- Livelihood restoration:
  - Review any livelihood-restoration programs and the extent to which they are assisting in improving or restoring livelihoods for affected households with consideration of gender equality.
  - Verify implementation of measures to improve or restore the quality of life and livelihoods of displaced households and assess their effectiveness.
  - Assess the extent to which the quality of life and livelihoods of men and women in affected communities are being improved or restored.
- Internal monitoring
  - Review internal monitoring and reporting procedures for conformity with the RAP/LRP.
  - Review internal monitoring records and identify any potential areas of noncompliance, systemic or recurrent problems, or any vulnerable groups or households that may have not received adequate assistance.
- Grievances
  - Review grievance records for evidence of any significant noncompliance or recurrent poor performance in resettlement implementation or grievance management.
  - Engage with a sample of complainants to review generic grievances (if applicable) and to obtain their views on the fairness of the grievance management process and resolution.
- Vulnerable people
  - Appraise systems to identify, track, and assist vulnerable people, and assess compliance with the RAP.
- Implementation
  - Assess whether there are adequate resources to implement the RAP and any training or capacity-building requirements.
  - Assess the data management system and its outputs and outcomes.
  - Compare progress against the initial schedule.
  - Review any situations of corruption, extortion, or other unethical behavior, and how they have been managed.

The terms of reference for compliance review will be in alignment with the template provided IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), Appendix K.

13.2.3. RAP Completion Audit

As required by IFC PS5, a **RAP Completion Audit** will be undertaken **by competent external independent resettlement experts**[112] once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods.

Timing

The completion audit will be conducted following the conclusion of the post-implementation RAP monitoring period – which extends **two years beyond the completion of the RAP implementation** – subject to the Lenders' approval. This timeline is intended to allow sufficient time for the sustainable restoration of livelihoods

Objectives

The completion audit will involve a more in-depth assessment than regular resettlement monitoring activities, including at a minimum:

- A review of all mitigation measures with respect to the physical and/or economic displacement implemented by the SPV,
- A comparison of implementation outcomes against agreed objectives,
- A conclusion as to whether the monitoring process can be ended, and
- Where necessary, a Corrective Action Plan listing outstanding actions necessary to met the objectives.

Key objectives of the audit will be to undertake the following:

- Assess the effectiveness of all measures to avoid and minimize displacement impacts by comparing final Project impacts on land and people against those anticipated in the RAP.
- Verify that all entitlements and commitments described in the RAP have been delivered and verify that delivery of compensation and livelihood-restoration measures was transparent, equitable, and prompt.
- Determine whether RAP measures have been effective in restoring or enhancing affected persons' living standards and livelihoods, including both men and women and vulnerable people.
- Check that resettlement-related grievances and court cases have been satisfactorily resolved (or that adequate provision has been made for their resolution in the near future).
- Check that gender barriers have been effectively challenged to ensure improved livelihood opportunities for women.
- Identify any corrective actions to achieve completion of RAP commitments and prepare a corrective plan if warranted.

Methodology

The methodology of the RAP Completion Audit to be conducted by external independent resettlement specialists will follow the relevant recommendations of IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023). It will draw on the data generated by ongoing internal monitoring by SPV and the findings of the IESC's periodic monitoring and external compliance reviews.

An indicative table of contents for RAP Completion Audit is presented **below**. The report will present conclusions on livelihood improvement or restoration and identify any corrective measures necessary to achieve livelihood restoration (as a minimum) for displaced households, and focus on whether physically displaced people have been successfully resettled, have security of tenure, and have similar or improved living standards. Particularly where cash compensation is offered, the report will verify that compensation was at full replacement cost and that people invested their compensation in replacing their homes and/or other assets, particularly those critical to livelihoods, such as agricultural land.

[112] May be a resettlement specialist, specialist company or group of specialists that have not been previously involved with the Project that is being audited.

RAP Completion Audit
– Indicative Table of Contents[113]

1. Executive Summary:

[Concise summary of resettlement undertaken to date, need for any on-going resettlement, magnitude of displacement, activities undertaken, grievances and key issues addressed, outstanding and on-going monitoring and evaluation processes and key recommendations]

2. Background

[A brief description of the monitoring process to date covering the Project and impacted communities, magnitude of displacement, key resettlement and livelihood impacts, legal framework, eligibility criteria and entitlement framework, timing of the various components of physical and economic displacement undertaken, resettlement and/or livelihood restoration activities and compensation provided and major or outstanding issues or grievances]

3. Review Objectives

[Outline of the main objectives of the resettlement and/or livelihood restoration plan and a summary of studies and activities undertaken in support of resettlement implementation and livelihood restoration (e.g., preliminary and on-going consultation, stakeholder mapping and census surveys, asset surveys, socio-economic baseline studies, participatory planning meetings, site selection studies, organizational structures for implementation), and assessment of the process and evaluation of the outcome (including any participatory monitoring and evaluation methodologies used)]

4. Key Findings:

[Issues to be considered may include, among others:
- Extent of public information and consultation in advance of land acquisition, and adequacy of ongoing consultation
- Types of compensation provided and adequacy of that compensation (e.g., sufficient to cover replacement costs of lost assets, housing conditions, compensation/entitlements, income restoration and livelihood sustainability measures)
- Level of participation of affected people in decisions regarding compensation rates, location of new resettlement sites and options for livelihood restoration
- Adequacy of replacement housing in terms of physical structure, location, and access to resources and services
- Effectiveness of livelihood restoration measures
- Integration into host communities
- Impact on cultural property
- Measures taken to protect (affected) vulnerable persons and groups
- Adequacy of the grievance redress process and outcomes
- Monitoring and evaluation process and outcomes]

5. Conclusion and Key Recommendations/Corrective Actions:

[Concise summary of conclusions and recommendations, and for any gaps or outstanding issues, provide a proposed time bound Corrective Action]

[113] This indicative outline is based on IFC Guidance Note 5 on Land Acquisition and Involuntary Resettlement, Annex B. It may be revised as necessary to reflect specific Project circumstances (such as relocation of affected businesses) identified during the RAP implementation and monitoring period.

14. Roles and Responsibilities

This Chapter outlines the respective responsibilities of the public and private partners in relation to the implementation of the RAP and describes the Project-specific **Public-Private Partnership (PPP) Control Chief Engineering Unit,** established by KGM under its 13th Regional Directorate of the KGM, to support effective Project implementation in accordance with national legislation and the Lenders' requirements related to the RAP:

- Split responsibilities of the KGM and SPV under **the BOT Contract**
- Responsibilities of KGM in accordance with the **Expropriation Law**
- Responsibilities of the SPV under the **RAP** to fulfil Lenders' requirements

14.1. Responsibilities under BOT Contract

As per the BOT Contract, the land acquisition related responsibilities of KGM, along with the contractual responsibilities of the SPV, are summarised in Table 14-1.

Responsibility of KGM is limited to execution of expropriation in line with the Expropriation Law of Türkiye. As such, implementation of RAP measures including livelihood restoration, assistance to vulnerable people, compensation of informal users as well as stakeholder engagement and monitoring – including allocation and disbursement of the budget required for RAP implementation (RAP Fund) will be the responsibility of the SPV – in agreement with KGM.

The detailed responsibilities of the KGM, as the **Contracting Authority**, and the SPV, as the **Assigned Company**, are further elaborated in the subsequent sections of this Chapter.

Table 14-1. Land Acquisition related Responsibilities of KGM and the SPV as per the BOT Contract – Article 13

Subject	**Assigned Company –** SPV	**Contracting Authority / Administration –** KGM
Expropriation programme	Expropriation plans and expropriation program prepared by the Assigned Company in accordance with the Technical and Administrative Specifications of the Administration shall be delivered to the Administration 9 (nine) months prior to the date of use of the relevant land according to the approved Work Program.	Expropriation procedures shall be carried out by the Administration according to the provisions of Expropriation Law No. 2942. The Administration shall carry out expropriation operations according to the approved Work Program.
Expropriation cost	**TRY 1,189,485,577.56**[114] of the expropriation cost of the road construction site shall be paid by the Assigned Company. The Assigned Company shall pay the amount to be paid for expropriation in quarterly periods following the delivery of the workplace in amounts to be determined by the Administration in accordance with the expropriation program.	The expropriation cost above the indicated amount shall be paid by the Administration.
Allocation and permitting of public lands	The costs associated with the allocation and permitting of state-owned parcels for the Project – to be used by the SPV on behalf of KGM – shall be borne by the SPV.	-
Expropriation plans	The production of expropriation plans, determination and marking of expropriation boundaries, construction and installation of expropriation boundary posts shall be carried out by the Assigned Company in accordance with the relevant specifications attached to this contract. For all expropriation works, the following shall be carried out by the Assigned Company: - Real Estate Valuation Engineering Services, - Expropriation Plan Production, - Execution and Completion of Expropriation Transactions, - Zoning Plan Amendment, and - New Zoning Plan Preparation Engineering Services, and - Other engineering services procurement works made by the Administration All kinds of expenses related to the works shall be paid by the Assigned Company.	The Administration shall approve the companies to be selected by the Assigned Company to carry out these works before the commencement of work.

[114] This value is valid for 2025 and will be updated annually based on the formulation specified in the BOT Contract, taking into consideration the current Consumer Price Index as published by the Turkish Statistical Institute (TurkStat). It will be paid by the SPV to KGM as agreed with the authority. The amount was originally included as TRY 500,000,000.00 under Article 13 of the BOT Implementation Contract.

Subject	Assigned Company – SPV	Contracting Authority / Administration – KGM
Capacity enhancement	The Assigned Company will provide the Administration with sufficient technical and administrative personnel, technical equipment, tools and equipment experienced in expropriation in line with the request of the Administration without any charge. These technical and administrative staff will continue to work until the expropriation procedures (cost determination and registration) are completed, even after the Motorway is opened to traffic.	-
Zoning plans	The Assigned Company shall notify the Administration of the zoning plan amendment requests required due to expropriation, project and project changes required to fulfil the construction and operation obligations. Necessary upper and lower scale zoning plan and zoning plan amendments will be made by the Assigned Company according to the approved project. In case there are changes in the project at the end of the Construction Period, upper and lower scale zoning plan amendments and new zoning plans will also be made by the Assigned Company.	Necessary applications for zoning plan amendments arising from project and project changes and requested by the Assigned Company shall be made by the Administration.
Temporary facilities	The Assigned Company shall first notify the Contracting Authority of any material quarries, construction sites and storage areas belonging to it. In addition, the Project shall notify the Administration of the process stages such as surveying the lands in the areas belonging to places such as all kinds of other material quarries, construction sites and storage areas that will be needed for the realization of the Project, determining the ownership and usage status, transferring this information to maps and reports within the framework of the relevant legal regulations. Pursuant to Articles 13 and 14 of the Soil Conservation and Land Use Law No. 5403, obtaining Non-Agricultural Use Permits for the quarry, construction site, concrete plant, plant and warehouse etc. areas required for the project routes and road construction, which fall on agricultural lands, and the preparation of the soil protection projects required for the permit, and the implementation of the project and the necessary works and procedures regarding the application to be made by the Administration on the subject will be followed and finalized by the Assigned Company.	The Contracting Authority shall allow the use of all kinds of material quarries, construction sites and storage areas that will be needed for the realization of the Project by the Assigned Company free of charge from among those owned or allocated to it. In the absence of all kinds of material quarry, construction site and storage areas etc. belonging to the Administration or allocated on behalf of the Administration; sites will be provided from the areas under the private property of the Treasury and under the provisions and savings of the State, from the areas within the scope of the Pasture Law or within the scope of the state forest, and the necessary allocation and / or permission procedures will be finalised by the Administration.

Source: BOT Contract.

14.2. Contracting Authority – KGM

The contracting authority of the Project – MoTI represented by the KGM – is responsible for executing Project-related land acquisition and expropriation in accordance with the Expropriation Law of Türkiye. For this Project, the land acquisition process carried out by KGM under the Expropriation Law includes the following:

- **Expropriation of privately-owned parcels.**
- **Allocation of state-owned parcels** including treasury lands, forestry lands, non-registered lands as well as lands owned by legal entities – for permanent or temporary use by the Project during the construction period.
- **Coordination of the identification process** for affected infrastructure and above-ground facilities belonging to other institutions that overlap with the Project, and execution of official correspondence with the relevant institutions – with the SPV responsible for any required follow-up correspondence or communication.

As per the Expropriation Law, the KGM holds several key responsibilities regarding the expropriation of privately-owned parcels. These responsibilities include, but are not limited to, the following:

- Approval of Expropriation Plans: KGM is responsible for approving expropriation plans prepared by the national engineering firm (valuation contractor) appointed by the SPV. These plans include a comprehensive inventory of assets along the Motorway's expropriation corridor[115] and identify the corresponding legal owners and shareholders.
- Valuation of Immovable Assets: KGM ensures the valuation of immovable assets is conducted in accordance with the Valuation Methodology (Section 6.3).
- Notification and Invitation to Negotiations: KGM formally notifies the identified owners and shareholders (including rightful heirs) and invites them to participate in negotiations regarding the expropriation through Article 8 notifications.
- Conducting Negotiations: Through a Negotiation Commission established by KGM under Article 8, the agency undertakes negotiations with the owners and shareholders participating in the negotiation meetings.
- Documentation and Legal Proceedings: KGM documents both agreements (through agreement protocols) and no agreement cases (maybe due to disagreement, abstention or non-attendance cases) with affected people. In cases of no agreement, the agency initiates court proceedings pursuant to Article 27 and 10 of the Expropriation Law. In the presence of an Article 27 accelerated expropriation decision issued by the President, as with this Project, KGM files a court case for land seizure under the provisions of Article 27 (Accelerated Expropriation).
- Finalising Land Registry and Payment: KGM oversees the completion of land registration processes and ensures payment of the determined expropriation value to the owners and shareholders. The registered title is transferred in the name of KGM.
- Requesting Parcel Evacuation: KGM formally requests the evacuation of expropriated parcels from the relevant authorities once the expropriation is complete.

The key responsibilities of the relevant KGM departments are outlined in Table 14-2.

Table 14-2. KGM's Roles and Responsibilities relevant to RAP

Role	RAP related Key Responsibilities
General Manager	• Establish a Public-Private Partnership (PPP) Control Chief Engineering Unit for the Project (see Section 14.4)
Department of Operations	• Support the preparation of the RAP, ensuring alignment with national legislation and Lenders' standards • Review and approve the RAP internally before it is submitted for review by the Lenders • Monitor the implementation of Lenders' land acquisition requirements through periodic progress reporting • Provide support for audits related to the implementation of RAP measures and commitments • Support the conduct of periodic RAP monitoring studies during implementation • Inform the KGM Department of Immovables regarding additional expropriation needs that arise during Project execution • Review and approve design changes proposed by the SPV, including features such as overpasses, underpasses, culverts aimed at mitigating land fragmentation impacts or construction of structures such as retaining walls to avoid or minimise impacts on structures located outside but adjacent to the Motorway's expropriation corridor. • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP
Department of Immovables	• Coordinate with the relevant KGM Regional Directorate to ensure land acquisition is implemented in full compliance with the Expropriation Law • Procure and allocate the budget required for the Project's expropriation activities • Ensure at least annual update of valuations • Monitor the overall progress of the land acquisition process • Determine expropriation costs in accordance with Article 8 of the Expropriation Law, ensuring they meet the Lenders' replacement cost standards and increase the rate of negotiated settlements with affected people

[115] As of May 2025, the census and asset inventory have been completed along the full alignment, with the exceptions of Serik Connection Road and D400, Alara, Akdam and Cakallar settlements, as outlined in Section 7.2.

Role	RAP related Key Responsibilities
	• Initiate Article 27 procedures under the Expropriation Law to enable land entry by the Project where no agreement is reached, following the acquisition of necessary permits • File and conclude Article 10 court cases as a legal follow-up to the Article 27 process, in accordance with the law • Support RAP monitoring and evaluation, including the tracking and documentation of implementation outcomes • Oversee and ensure resolution of land acquisition–related grievances • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP.
KGM 13th Regional Directorate (Antalya)	• Executes the responsibilities under the PPP Control Chief Engineering Unit • Implement the land acquisition process in accordance with the Expropriation Law, as outlined in the RAP • Process expropriation payments to eligible right holders and beneficiaries in coordination with the DG Department of Immovables Review • Oversee the RAP implementation by the SPV's RAP implementation team, including management of grievances • Collaborate with the SPV's RAP implementation team to ensure the posting of the inventory of assets and disclosure of cut-off date notices in affected settlements • Provide feedback on brochures and other informational materials prepared by the SPV for public and stakeholder engagement • Manage land-acquisition related grievances and oversee processes related to Project impacts, and legal rights • Share up-to-date data with the SPV concerning the status of expropriation activities, ongoing court cases, and other relevant land acquisition details to support land access planning and construction scheduling. • Coordinate land acquisition process involving state-owned and legal entity-owned parcels in collaboration with the SPV, when necessary. • Collect, evaluate, and address formal applications from landowners for the acquisition of orphan lands, in accordance with timeframes stipulated by the Expropriation Law. • Manage land acquisition-related grievances in line with their established institutional procedures, including receiving, evaluating, and responding to grievances and feedback from affected people. • Issue written notifications to the SPV regarding requests or issues requiring the SPV's action – such as integration of design modifications or construction-related considerations; monitor and confirm the implementation of these actions. • Review official correspondence and monthly construction progress reports submitted by the SPV, including updates on RAP implementation progress; provides timely feedback or instructions to the SPV as appropriate. • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP.

14.3. SPV – RAP Implementation Team

Land acquisition in accordance with the Expropriation Law is the responsibility of KGM. On the other hand, the SPV holds contractual responsibilities for covering a portion of the Expropriation Cost, and acquiring land use rights and permits for temporary or permanent facility sites, where such sites are located outside the Project's expropriation corridor, as outlined in Section 14.1.

The SPV is responsible for implementing this RAP in collaboration with KGM. In consultation and agreement with KGM, the SPV shall lead the implementation of RAP measures, including livelihood restoration, support to vulnerable groups, compensation for informal users, stakeholder engagement and consultation, monitoring and reporting of RAP implementation progress, and budget (RAP Fund) allocation and disbursement for RAP-related activities (as detailed in Chapter 16).

The SPV will allocate and manage a RAP Fund to finance the costs associated with the implementation of RAP measures that are not covered under national legislation, as well as to provide for the human resources required to ensure effective implementation.

RAP Implementation Team

The SPV has started setting up a dedicated RAP Implementation Team responsible for the day-to-day delivery of RAP measures in collaboration with KGM, as provided in Figure 14-1.

The team will be led by SPV's E&S Manager (to be appointed), and include an Expropriation Manager (appointed), CLOs (appointed), and an Agricultural Expert (to be appointed).

The core team will be supported by both in-house teams and third-party implementation partners and consultants (to be appointed).

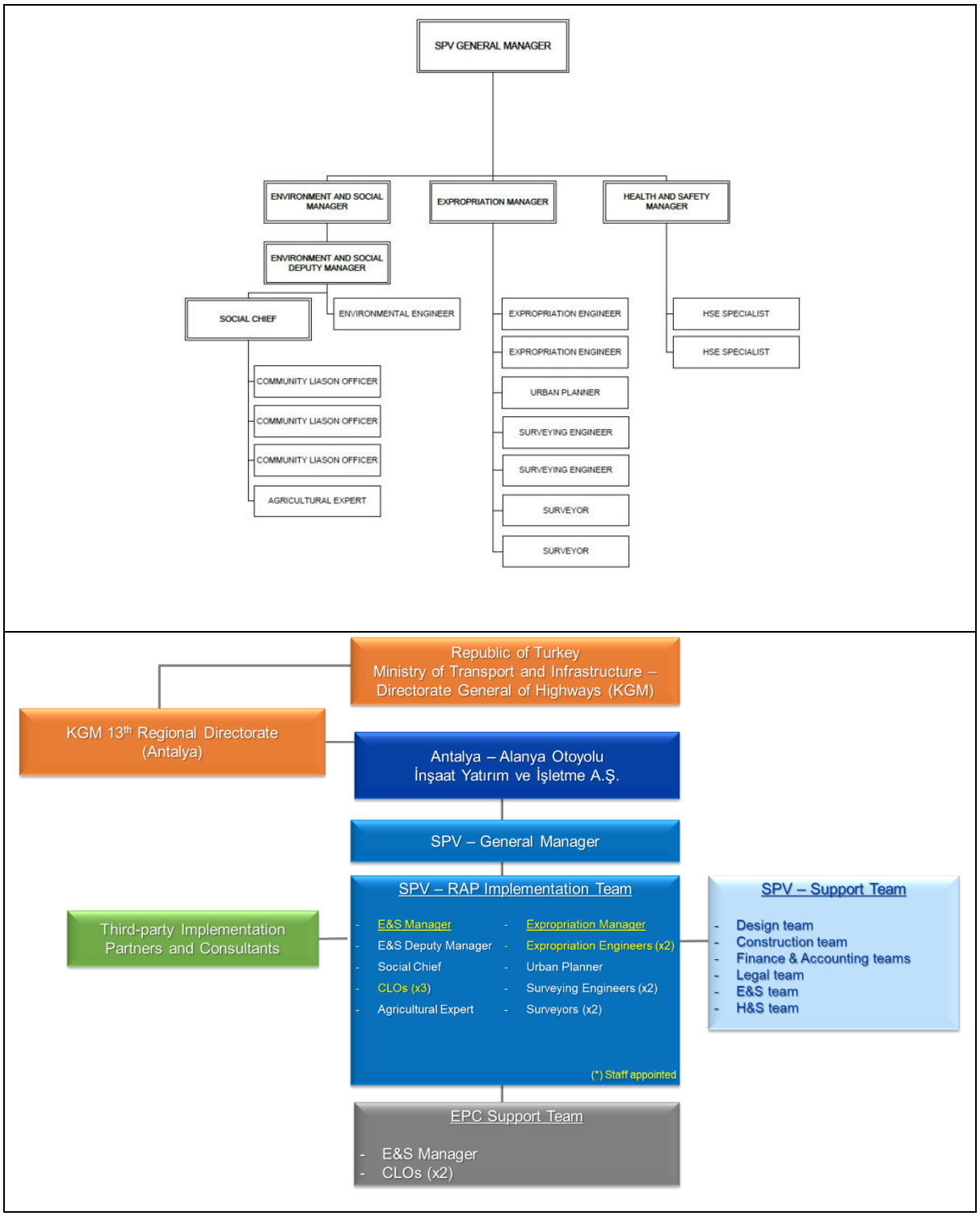


Figure 14-1. General E&S Organogram and the RAP Implementation Team Structure

Roles and Responsibilities of the RAP Implementation Team Members

The roles under the RAP implementation team and their key responsibilities for RAP implementation are outlined in Table 14-3.

Table 14-3. Key Roles and Responsibilities of the RAP Implementation Team Members

Role	Responsibilities
Corporate Management	
Senior Management Representatives in the SPV	• Coordinate with KGM as required to support the effective implementation of the RAP. • Review and internally approve the RAP, including all relevant components such as entitlement frameworks, implementation costs (RAP Fund), and timeframes, as well as any necessary updates. • Conduct periodic reviews of RAP implementation based on reports submitted by the Project Management. • Serve as the decision-maker on specific RAP implementation matters, if required or requested by the SPV and EPC RAP teams. • Undertake engagement with Lenders and their IESC on specific RAP implementation matters and progress. • Allocate the financial resources necessary for RAP implementation.
SPV – Management	
General Manager	• Represents Senior Management • Ensure that measures for the avoidance and/or minimisation of displacement impacts are considered during Project design and implemented on site, where feasible; communicate such measures to Corporate Senior Management Representatives for further discussion with and approval by KGM. • Lead the communication and coordination with the KGM, represented by the PPP Control Chief Engineering Unit • Organise monthly coordination meetings during construction phase between the SPV and PPP Control Chief Engineering Unit. • In coordination with the E&S Manager, ensure that the EPC Contractor and subcontractors are fully aligned with the RAP through relevant contractual provisions. • Ensure that the Land Entry and Exit Protocol is integrated into the work permit system and enforced on the EPC Contractor through contractual conditions, which must also be reflected in the contracts of all subcontractors, including lower-tier subcontractors involved in the Project. • Review and approve the RAP related information to be shared with the KGM, Lenders, and affected parties. • Manage the financial resources allocated by the Senior Management for RAP implementation.
SPV – RAP Implementation Team	
E&S Manager	• Lead the SPV's RAP Implementation Team and oversee the day-to-day implementation of the RAP in coordination with SPV – General Manager, the Expropriation Manager, CLOs and other relevant in-house support teams. • Support the SPV – General Manager in communication and coordination with the PPP Control Chief Engineering Unit. • Coordinate and supervise third-party RAP implementation partners and consultants for effective RAP implementation. • Ensure the development and implementation of specific livelihood restoration and improvement projects in coordination with the RAP Implementation Team experts and third-party implementation partners and consultants. • Act as the custodian of the Project-specific SEP, including the grievance mechanism, and ensure its documentation and regular updates. • Coordinate SPV and EPC CLOs to ensure effective outreach to vulnerable members of affected communities. • Steer establishment a dedicated RAP Grievance Database; ensure that all land acquisition-related grievances and feedback are recorded by the SPV and EPC CLOs, separate from other project grievances. • Review and convey land acquisition-related grievances and feedback from affected people to KGM in writing, through periodic (e.g. monthly) progress reports or on a case-by-case basis, if collected by the SPV through the Project grievance mechanism. • Decide on appropriate measures and actions for land-related grievances to be managed internally by the SPV, with support from the Expropriation Manager, CLOs, and relevant Project departments. • Manage other RAP related social and human rights impacts identified in the ESIA, in accordance with the SPV's relevant management plans. • Organise preparation and delivery of necessary training sessions necessary for effective RAP implementation. • Periodically review and evaluate the capacity of teams and experts involved in RAP implementation and inform the SPV – General Manager and Corporate Senior Management Representatives in the SPV of any capacity-building needs. • Develop and implement a social media strategy in collaboration with relevant support teams. • Report regularly to the SPV – General Manager and Corporate Senior Management Representatives in the SPV on RAP implementation progress and challenges. • Coordinate both internal and external RAP monitoring and reporting activities and ensure preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders.

Role	Responsibilities
Deputy E&S Manager	• Support the E&S Manager in the implementation of the RAP • Carry out RAP related responsibilities delegated by the E&S Manager
Expropriation Manager and the expropriation team	• Act as the interface between the SPV and the expropriation teams of the KGM DG and 13th Regional Directorate to follow up on and coordinate matters related to expropriation, court cases, land entry processes, and other related activities. • Ensure daily coordination with the PPP Control Chief Engineering Unit and alignment between the expropriation process and the implementation of the RAP. • Coordinate the work of other expropriation engineers employed under the SPV. • Coordinate the expropriation plan production works carried out by the national engineering firm (valuation contractor). • Provide support to the E&S Manager in reviewing and managing land acquisition-related grievances, including the identification of responsible internal and external parties for their resolution. • Obtain and review grievances and requests managed directly by KGM and convey the relevant information to the E&S Manager for integration into the Project's Grievance Mechanism and RAP Grievance Database. • Monitor and track decisions issued under Article 27 and Article 10 court processes in coordination with KGM, including valuation amounts and set-off requirements; identify and report any cases where land seizure values are reduced by the courts at the conclusion of the Article 10 process to SPV – General Manager and Corporate Senior Management Representatives • Compile monthly land acquisition progress reports and submit them to the E&S Manager for integration into the periodic Project reports submitted to KGM and Lenders by the SPV.
CLOs (male and female)	• Lead the daily on-site implementation of the Stakeholder Engagement Action Plan (as outlined in RAP Section 10.3) and the Project Grievance Mechanism, along with the implementation of the broader Project SEP, under the supervision of the E&S Manager and Expropriation Manager • Engage directly with affected people to implement RAP measures and actions, including regular community visits, calls, or other forms of communication, ensuring affected people are informed of their rights under national legislation and the RAP. • Establish and maintain a comprehensive database of all affected people, including physically and economically displaced households, individuals with vulnerabilities, and formal and informal users of affected parcels. • Ensure inclusive outreach to vulnerable groups and women under RAP implementation through dedicated sessions. • Guide and support affected people in completing administrative tasks associated with resettlement, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices). • Mediate issues between affected people and Project; forward community questions and concerns to the appropriate government authorities and the Project and corporate management representatives. • Maintain the dedicated RAP Grievance Database by accurately recording all land acquisition-related grievances and feedback received through various channels, ensuring it remains distinct from other project-related grievance records. • Ensure all grievance registered are forwarded to the E&S Manager or relevant departments for resolution, and properly closed out in compliance with the SEP. • Maintain detailed and accurate records of all engagement activities, including meeting agendas, minutes, and follow-up actions, in coordination with other experts. • Prepare and distribute communications material – such as brochures, reports, letters, and notifications – with approval from SPV General Manager, E&S Manager and/or Expropriation Manager, as relevant. • Ensure registering of incoming documentation from both internal and external parties by relevant Project parties. • Identify site implementation problems and bottlenecks related to RAP and stakeholder engagement and report them to the SPV General Manager, E&S Manager and/or Expropriation Manager, as relevant. • Contribute to both internal and external RAP monitoring and reporting activities and preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders. • Coordinate and supervise EPC – CLOs to ensure alignment and consistency across all engagement efforts.
Agricultural Expert	• Lead day to day implementation of agricultural livelihood restoration programmes in line with RAP. • Coordinate and work in collaboration with the experts of the agricultural authorities and third-party implementation partners.
Support Team[116]	• Remain available to provide ongoing support to the RAP Implementation Team throughout the RAP implementation period. • Support the establishment of the RAP Implementation Team by preparing job descriptions, participating in candidate interviews, and assisting with recruitment processes. • Conduct necessary surveys and assessments, both site-based and desktop, for affected structures and buildings. • Review official documentation of affected businesses to inform compensation and/or assistance for temporary business interruptions; this may include, but is not limited to, financial records (e.g. net income statements, salary records), licenses, and permits.

[116] The Support Team may include Design, Construction Finance, Legal, Accounting, Permitting, Human Resources (HR), Administrative, Public Relations teams among others.

Role	Responsibilities
EPC Contractor – Support Team	
EPC Contractor – E&S Manager	• Ensure implementation of all RAP-related actions delegated by the SPV through the EPC Contract and subcontractor agreements. • Maintain an E&S organisational structure that aligns with the SPV's E&S structure, including clear roles, responsibilities, and reporting lines. • Implement the E&S commitments outlined in the ESIA, SEP, ESMP, and other specific management plans incorporated in the EPC Contract, to avoid and/or mitigate construction-related impacts on affected people and their livelihoods; allocate adequate financial and human resources for effective implementation of those avoidance and mitigation measures. • Continuously explore opportunities to avoid or minimise adverse impacts during construction and propose feasible measures to the SPV – E&S Manager. • Ensure signing proper consent or lease agreements for lands that will be used temporarily during construction. • Manage construction activities in full compliance with the work permit system, particularly adhering strictly to Land Entry and Exit Protocols. • Reinstate and return temporarily used land to its original condition and hand it back to the owners upon completion of use. • Make payments for standing crops on parcels to be entered – if any – where land entry cannot be delayed until the harvesting season. • Compensate for any verified damage or spillages to neighbouring (non-expropriated) lands or for damage to standing crops on lands not formally included in the Project footprint. • Provide compensation for verified livelihood losses resulting from EPC Contractor activities. • Reinstate any damages to public or private infrastructure and services caused by EPC Contractor activities, once verified. • Ensure that any land acquisition-related grievances or feedback received by the EPC Contractor or subcontractors are recorded in Project's dedicated RAP Grievance Database maintained by the SPV, and addressed in coordination with the SPV in line with the Project SEP.
EPC Contractor – CLOs	• Deliver tasks delegated by the SPV – RAP Implementation Team's E&S Manager, Expropriation Manager, and/or other CLOs, in line with the defined roles and responsibilities. • Support stakeholder engagement and grievance management processes as defined by the SPV – RAP Implementation Team, including participation in community meetings, information dissemination, and responsive communication with PAPs. • Record any land acquisition-related grievances or feedback received by the EPC Contractor or subcontractors in Project's dedicated RAP Grievance Database maintained by the SPV.

Roles and Responsibilities of the Third-party RAP Implementation Partners and Consultants

The support to be provided by the in-house and external support personnel, specialists or consultants is summarised in Table 14-4.

Table 14-4. Key Roles and Responsibilities of the Third-party RAP Implementation Partners and Consultants

Role	Specific Requirements	Framework of the Support
Implementation Partner – RAP Implementation and Monitoring Consultant	• Adequate RAP implementation experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• Provide consultancy and support to SPV – RAP Implementation Team to ensure alignment with IFC PS5. • Guide and advise the SPV on the timely and effective execution of actions specified in the RAP. • Support the SPV in establishing and maintaining a RAP monitoring database consistent with the monitoring indicators defined in the RAP. • Assist the SPV in conducting internal monitoring and reporting activities in accordance with the monitoring indicators and reporting frequencies specified in the RAP. • Monitor the relocation processes and confirm successful re-establishment of houses, greenhouses and businesses. • Support the SPV in establishing and maintaining a dedicated RAP Grievance Database. • Review documentation related to ongoing land acquisition and resettlement activities – including stakeholder engagement and grievance management – to identify any gaps or areas for improvement and advise on corrective actions to ensure compliance with the RAP. • Provide guidance to the SPV in responding to any requests for action issued by the Lenders and IESC. • Provide support to the SPV as needed before and/or during the RAP Completion Audit.
Third-party Valuation Expert	• Specialised in valuation • Available to provide support on an ongoing basis as needed throughout the RAP	• Review each affected house, greenhouse and business to determine the amount of the RAP compensation package to be provided to each affected party in consultation with them. • Support the SPV in reviewing specifics of tenancy agreements to determine case-by-case provisions that may required compensation by SPV, as needed • Decide on how the packages will be delivered to the affected business

Role	Specific Requirements	Framework of the Support
	implementation	owners, whether at once (one-off cash compensation) or based on milestones. • Provide third-party evaluation and opinion regarding the requests, claims, or objections raised by affected people on matters related to expropriation and valuation (such as income loss due to land fragmentation, insufficient compensation for structures, trees, orchards or crops) to prevent conflicts, especially where there is disagreement between owners and the SPV or KGM. • Review and determine necessary actions by the SPV regarding the implementation of the 1/1,000 scale Implementation Zoning Plan, including compensation for unacquired portions if they are rendered economically unusable or undevelopable. • Review the outcomes of expropriation cases under Article 10 and develop case-specific corrective actions where needed (e.g., in cases of decreased land seizure value).
Implementation Partner for Livelihood Restoration for Affected Lands – External Agricultural Consultancy Company	• Adequate relevant experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• Provide consultancy support in identifying alternative resettlement sites, assessing their advantages and disadvantages, and selecting the most suitable resettlement location taking into account the unique characteristics of affected people • Provide consultancy support in designing specific livelihood restoration and improvement projects, in close consultation with affected people and relevant stakeholders such as District Directorates of Agriculture and Chambers of Agriculture. • Develop tailored agricultural training programs at the community or household level to support sustainable livelihood improvement. • Assist households in conducting demonstration cultivation and harvesting activities as part of practical livelihood restoration support.
Implementation Partner for Relocation and Livelihood Restoration for affected Businesses – External Business Consultancy Company	• Adequate relevant experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• Provide consultancy support in identifying alternative resettlement sites, assessing their advantages and disadvantages, and selecting the most suitable resettlement location taking into account the unique characteristics of each business • Based on the evaluation and determination of business-specific needs, provide consultancy, training and/or support in the areas listed, but not limited to the following for re-establishment and development of business at the replacement premises: - Access to financial opportunities, incentives, grant programmes, supports, etc. available to micro, small and medium sized enterprises - Certifications, accreditations, management systems, etc. relevant to the business operations - Development and delivery of job-specific training programmes for employees - Operational efficiency, marketing strategies, digital transformation, e-commerce, access to national and international markets, as relevant to the business operations • Review each affected business to determine the amount of the Business Relocation Support Package to be provided to each business owner in consultation and agreement with them (considering and evaluating compensation needs for any investment that might have been done after inventory of assets) • Decide on how the packages will be delivered to the affected business owners, whether at once (one-off cash compensation) or based on milestones • Review each affected business and determine the amount of net income loss support to each business owner, with support from financial and accounting teams of the SPV based on official financial and accounting records • Monitor the relocation process and confirm successful re-establishment of business at the new premises to cease monthly net income support – subject to verification by Lender's IESC. • Evaluate the need to extend the post-relocation net income support (to business owners) duration in coordination with the RAP Monitoring Experts and plan actions accordingly in line with Lenders' requirements • Determine the employment conditions of the current employees of affected businesses (e.g. full-time employment, gross and net salaries, etc.) • Review and evaluate the eligibility of employees hired after the date of Early Consultations and Notification for Land Acquisition for RAP entitlements

Role	Specific Requirements	Framework of the Support
		• Assess and identify the temporary income loss impact of the Project on employees of affected businesses to verify that they are eligible for net income support through RAP • Monitor and verify the need for extension of gross salary support to affected employees due to significant Project impacts (envisaged as up to 3 months in RAP) • Review and verify the employee dismissal cases to identify the actual causes, relevance of the case with business relocation and eligibility for RAP entitlements • Provide consultancy on formalisation of informal workforce where applicable to the business as part of the livelihood restoration and improvement programme • Provide consultancy to affected employees who lose their jobs due to reasons that are not under their control and directly related/inevitable due to relocation regarding alternative job opportunities that may be suitable for their skill set in the region and other opportunities that may help them find replacement jobs, etc.
Valuation Contractor	• Specialised in valuation • Available to provide support as needed	• Update or prepare valuation studies for approval by KGM in cases of land acquisition extending beyond 2025 or for any future additional land acquisition requirements of the Project. • Conduct detailed valuation of fixed investments made at affected houses, business premises, and similar structures, as well as those to be made at replacement sites, including associated costs for assembly, disassembly, and relocation.

14.4. Public-Private Partnership (PPP) Control Chief Engineering Unit

A Project-specific **Public-Private Partnership (PPP) Control Chief Engineering Unit** has been established by KGM under the 13th Regional Directorate of the KGM, for effective Project implementation in line with national legislation and the Lenders' requirements concerning the RAP.

The structure of this implementation unit, as officially approved by KGM on 31 December 2024, is presented in Figure 14-2.

At the central level, the SPV works in coordination with the Department of Operations at KGM Headquarters, which is responsible for overall Project oversight and strategic coordination.

For daily Project management issues, the SPV coordinates and collaborates closely with this Unit. In line with the BOT contract requirements, this Unit serves as the SPV's direct contractual counterpart under the BOT Implementation Contract. **The Expropriation Manager of the SPV, supported by expropriation engineers and other relevant team members, is responsible for ensuring daily coordination and alignment between the expropriation process and the implementation of the RAP.**

- The Regional Director and the PPP Chief Engineer jointly oversee the functioning of the PPP Control Chief Engineering Unit.
- The PPP Chief Engineer serves as the head of the unit and reports directly to the Regional Director. The Deputy Regional Director also supports both officials in coordinating the Unit's activities.
- All personnel within this structure (except for drivers) have been appointed by KGM and are government civil servants.
- The Unit is composed of several sub-units, consisting of engineers and other technical personnel representing the relevant departments of the Regional Directorate
    - Project and Consultancy Sub-unit
    - Immovables Sub-unit
    - Motorway Construction Sub-unit
    - Motorway Operations Sub-unit
    - Engineering Structures Sub-unit
    - Research and Engineering Sub-unit
- Upon the completion of the Motorway construction and its official opening to traffic, the responsibilities of the Motorway Construction Sub-unit are formally concluded. From that point onward, the Motorway Operation Sub-unit commences their duties.
- The officer undertakes filing and archiving services, along with the registration and processing of movable assets.
- The roles and responsibilities of the General Directorate departments, as well as the departments constituting the PPP Control Chief Engineering Unit, are described in the Section 14.2.
- To strengthen capacity and improve coordination between the KGM and SPV teams, the SPV has appointed the following full-time personnel:
    - Topographical engineers (x2)
    - Topographical technicians (x1)
    - Legal assistant (x1)

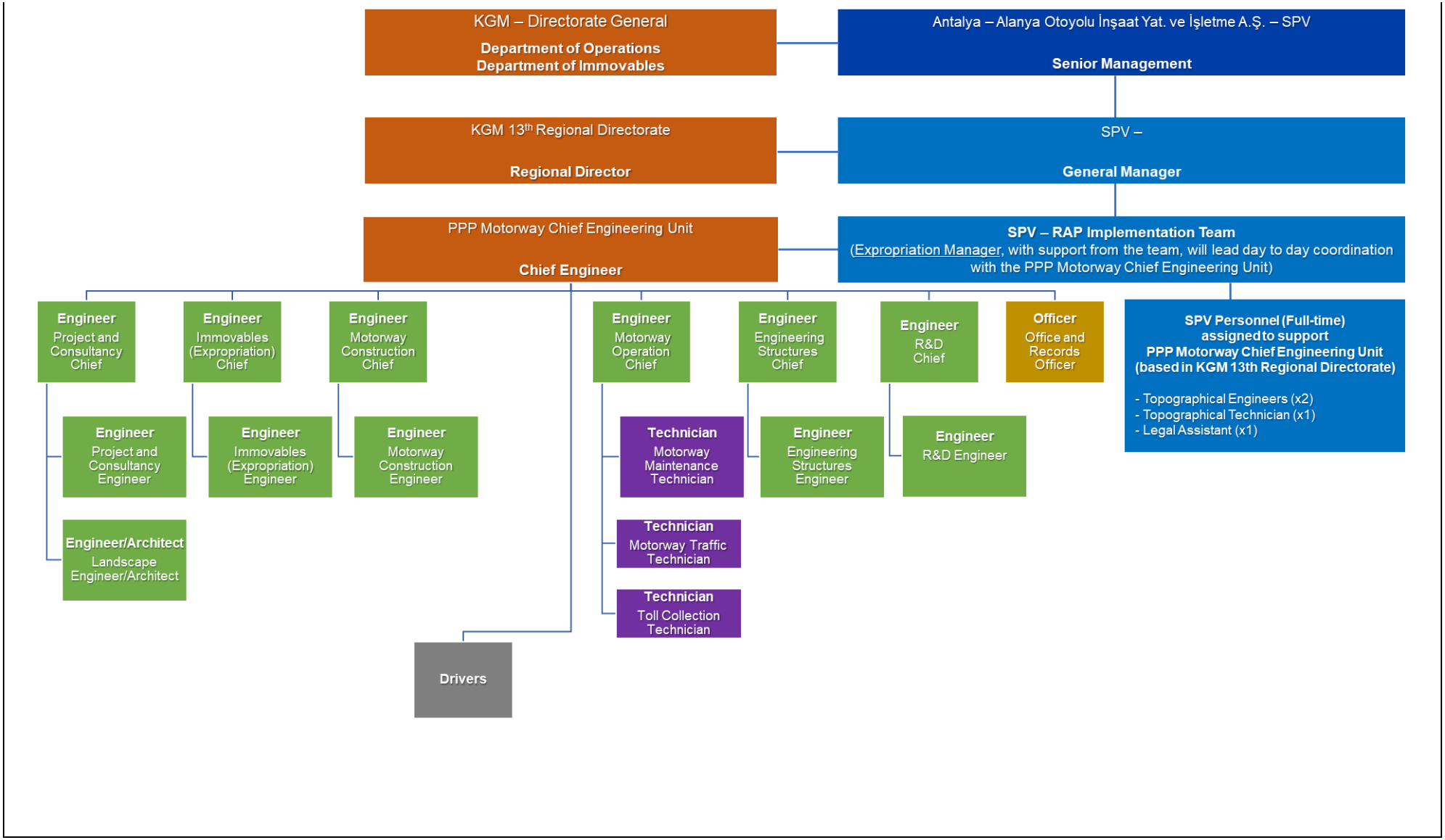


Figure 14-2. Project-level PPP Control Chief Engineering Unit operating under KGM's 13th Regional Directorate

Periodic Coordination Meetings between the PPP Control Chief Engineering Unit and the SPV

In addition to daily communication between the SPV and the 13th Regional Directorate of KGM through the PPP Control Chief Engineering Unit, **monthly** coordination meetings will be held during construction phase with the participation of the KGM Regional Directorate, the SPV, and the EPC Contractor.

The subjects to be discussed in these meetings will include, but not be limited to, the following:

- Project financing and alignment with Lender's requirements
- Project governance structure, including E&S capacity
- Project progress
- Expropriation programme and progress, including ongoing valuation processes, Article 8 negotiations and agreements, and legal proceedings under Article 27 and 10
- Facilitation of inheritance and succession procedures
- RAP implementation by SPV, including management of physical and economic displacement impacts and delivery of RAP entitlements
- Engagement with stakeholders, including affected communities and people, by KGM and SPV
- Planning for future valuation updates by KGM

The PPP Chief Engineer, in consultation with the KGM will undertake the following tasks:

- Determine the location, agenda and participants of the **monthly** coordination meetings, in consultation with KGM and SPV – RAP Implementation Team
- Ensure that minutes of the monthly coordination meetings are kept and distributed to all parties including Lenders and IESC.
- Coordinate and monitor completion of the actions (if any) decided in monthly meetings by responsible parties within agreed timeframes
- Approve disbursements to be done from the RAP Fund in consultation with the SPV – E&S Manager).

14.5. Potential Parties for Collaboration

The related authorities and third parties that may be involved in the development and implementation of detailed livelihood restoration, improvement, and assistance measures are listed in Table 14-5.

Table 14-5. Potential Parties for Collaboration

Party	Stakeholders
Ministries (including affiliated institutions) – through their provincial and district level representations and related affiliations	- Ministry of Agriculture and Forestry - Ministry of Environment, Urbanisation and Climate Change - Ministry of Family and Social Services - Ministry of Labour and Social Security - Ministry of National Education - Turkish Employment Agency – Antalya Provincial Directorate
Affiliated institutions of the Ministries	- Land Registry Offices in Serik, Manavgat and Alanya - West Mediterranean Agricultural Research Institute Directorate (BATEM)
Governorates	- Antalya Provincial Directorate of Agriculture and Forestry - District Directorate of Agriculture - Manavgat District Directorate of Agriculture - Alanya District Directorate of Agriculture
District Governorates	- District Governorate of Serik - District Governorate of Manavgat - District Governorate of Alanya
Municipalities	- Antalya Metropolitan Municipality - Serik District Municipality - Manavgat District Municipality - Alanya District Municipality
Settlements	- Heads of affected neighbourhoods (Section 3.1)
Professional Organisations	- Serik Chamber of Agriculture - Manavgat Chamber of Agriculture - Alanya Chamber of Agriculture
Universities	- Akdeniz University, Faculty of Agriculture - Business management, agriculture, agricultural economics, etc. departments of relevant universities
Private Sector	- Resettlement professionals - Expropriation and valuation experts
Others	- Relevant Non-governmental Organisations (NGOs) and Civil Society Organisations (CSOs) – such as women-focused non-profit organisations, youth associations, and other community-based groups will be identified during RAP implementation.

15. Implementation Schedule

The overall Project Schedule is provided in Section 2.5. The Project schedule information, key to RAP implementation schedule is summarized below:

- The **BOT Implementation Contract** (BOT Contract) for the Project was signed between KGM and the SPV on **14 October 2024**.
- The BOT Contract defines a concession period of **15 years**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the BOT Contract, the **construction phase is 36 months**, commencing from the date of signing the finance agreement for the Project between the SPV and the lenders.
- Based on the Detailed Work Schedule prepared by the SPV and approved by KGM on 20 March 2025, the expropriation process for the Project – including both expropriation payments under Article 8 and the deposit of land seizure fees under Article 27 – is planned to be carried out by KGM on a lot-by-lot basis. This will be aligned with the Project's construction schedule and subject to the availability of the expropriation budget. **The expropriation programme will be aligned with the construction schedule (36 months), subject to the availability of the expropriation budget and approval by KGM[117].**
- The **RAP implementation period will cover a duration of 36 months,** commencing from the singing of finance agreement. This period will encompass the entire construction phase (starting from the signing of the financing agreement) and may extend into the initial months of the commissioning and operational phase, if needed.
- Following the completion of RAP implementation period, **post-implementation monitoring will be conducted for approximately two years**, until a **RAP Completion Audit** will be carried out – by external independent resettlement specialists – with approval from Lenders, as outlined in Section 13.2.3.

[117]

Table 15-1. General Implementation Schedule for RAP

No.	Tasks	2025				2026				2027				2028				2029				2030			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Expropriation by KGM																								
1.	**Expropriation by KGM** in accordance with the Exp. Law (to be proceeded lot by lot in line with construction programme)																								
	1.1. Complete outstanding structure identification and valuation works for the Project and update the valuation as necessary																								
	1.2. Next valuation update																								
	Pre-finance																								
2.	**SPV to establish RAP Implementation Team**																								
	2.1. SPV initiated establishment of the team																								
	2.2. SPV will complete establishment of the team																								
3.	**SPV and Lenders to disclose** Project's E&S Documentation and SPV to conduct **Disclosure Period** consultations with Affected People																								
4.	**SPV to prepare supplementary RAP documentation**																								
	4.1. Guide to Land Acquisition (GLAC)																								
	4.2. RAP Implementation Procedure																								
5.	**SPV and Lenders to sign Finance Agreement**																								
	Post-finance																								
6.	**Construction period according to BOT Contract** (36 months, from finance agreement signing)																								
7.	**SPV to implement RAP** (including livelihood restoration) for **36-months** from finance agreement signing																								
	7.1. SPV to prepare a **detailed implementation schedule** for parcels subject to the relocation of affected houses, greenhouses, and businesses in line with the expropriation programme																								
	7.2. SPV to complete the **PAP Database** for Land Acquisition																								
	7.3. SPV to complete the **Affected Vulnerable Individuals Database** for Land Acquisition																								
	7.4. SPV to coordinate with relevant authorities, institutions, and local mukhtars, as needed, to help identify suitable resettlement sites – such as treasury land, unregistered parcels, or other																								

No.	Tasks	2025				2026				2027				2028				2029				2030			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	appropriate options – that can be allocated for housing construction with secure tenure particularly for landless PAPs																								
	7.5. SPV to contract **third-party Valuation Expert**																								
	7.6. SPV to contract **third-party RAP Implementation and Monitoring Consultant**																								
	7.7. SPV to contract external **Agricultural Consultancy Company**																								
	7.8. SPV to contract external **Business Consultancy Company**																								
	7.9. External Agricultural Consultancy Company to conduct final assessment of needs and opportunities and finalise livelihood restoration and improvement measures										7														
	7.10. External Business Consultant to prepare **individual (business-specific) relocation plans** for each affected business																								
	7.11. SPV to prepare **individual (house-specific) relocation plans** for each affected house																								
8.	**Post-implementation monitoring** by SPV, for **two years** following the conclusion of the RAP implementation period.																								
9.	**RAP Completion Audit** by external independent resettlement expert																								

16. Budget

In accordance with the Expropriation Law, expropriation activities are carried out by KGM. The respective responsibilities of KGM and the SPV are outlined in the BOT Contract, as summarised in Section 14.1.

The estimated total expropriation cost for the Project is approximately TRY 22.5 billion (*SPV, June 2025*).

These responsibilities and cost allocations are governed by the provisions of the BOT Contract.

- The portion of the Expropriation Cost related to the Motorway construction, amounting to approximately **TRY 1,189,485,577.56**[118], shall be borne by the SPV.
- Any Expropriation Cost exceeding this amount shall be covered by KGM, in accordance with Article 13 of the BOT Contract;
- The Assigned Company shall pay the amount to be paid for expropriation in quarterly periods following the delivery of the workplace in amounts to be determined by the Administration in accordance with the expropriation program.

As the BOT Contract does not include provisions for land acquisition-related costs beyond expropriation – such as livelihood restoration, assistance to vulnerable groups, compensation for informal users, and monitoring including external compliance reviews and a RAP Completion Audit – these expenses will be borne by the SPV through a dedicated **RAP Fund**.

The RAP Fund will be allocated and managed by the SPV, separately from the Project's Expropriation Budget (also referred to as mandatory cash compensation to be provided by KGM). All costs associated with additional measures not covered under national law, as well as the human resources necessary for the effective implementation of the RAP, shall be covered through the RAP Fund.

The indicative budget for RAP implementation through the RAP Fund is presented in Table 16-1. This budget has been developed based on a conservative estimate and is aligned with the entitlements defined in Section 7.3.

During implementation, the required funds for expropriation (to be provided by KGM) and RAP implementation (to be provided by the SPV) may fluctuate within the overall budget due to changing market conditions. If such adjustments become necessary, the respective budget allocations of KGM and the SPV shall be revised in line with their roles and responsibilities as defined in the BOT Contract.

The RAP is a living document and will be updated as necessary to include any additional categories of PAPs or individuals identified during RAP implementation, along with the entitlements required to be provided to them in order to ensure compliance with applicable international standards.

As shown in Table 16-1, the RAP Budget allocated by the SPV includes a **contingency fund amounting to 15%** of the RAP Budget (excluding the contingency itself) to cover any unforeseen costs that may arise during RAP implementation.

Examples of potential contingency items that may trigger the utilisation of this fund are listed below:

- Compensation for claims, if deemed valid by the third-party valuation expert to be commissioned by the SPV during RAP implementation, related to non-residential or secondary structures (for example, structures built before the cut-off date but not included in the inventory of assets) or structures without evidence of ownership.
- Preparation of RAP documentation and provision of entitlements for potential future expropriation works, in case they are not funded separately. These may include final design modifications (subject to KGM approval) or displacement of existing infrastructure belonging to other institutions (e.g., energy transmission lines, water and wastewater networks, natural gas pipelines) if such modifications require additional expropriation for specific parcels. All such cases will be subject to further evaluation and decisions by KGM, Lenders, SPV, and other relevant institutions.
- Additional compensation may be required in the future for cumulative impacts that are identified through further studies or RAP monitoring, beyond what is already included in the current RAP budget.

[118] This value is valid for 2025 and will be updated annually based on the formulation specified in the BOT Contract, taking into consideration the current Consumer Price Index as published by the Turkish Statistical Institute (TurkStat). It will be paid by the SPV to KGM as agreed with the authority. The amount was originally included as TRY 500,000,000.00 under Article 13 of the BOT Implementation Contract.

Transaction Costs Item under RAP Fund

In Türkiye, **title deed fees** ("*tapu harcı*") for real estate (land, plots, and residences) are paid separately by both the buyer and the seller. The fee is applied as 2% of the sale price for each party, amounting to a total of 4%. The title deed fee is paid to the tax office by the responsible party, and a receipt is issued as proof of payment. Additionally, the buyer is solely responsible for paying the **revolving fund fee** ("*döner sermaye harcı*") related to the title deed transaction.

In practice, it is often observed that the seller does not pay their share of the title deed fee, and the entire amount is paid by the buyer. Therefore, it can be assumed that landowners whose plots or agricultural land are expropriated along the project route will bear the full title deed fee when making a new real estate investment.

The base value for calculating the title deed fee can be obtained from the real estate department of the relevant municipality within metropolitan boundaries.

- **Title deed fee** ("*tapu harcı*"): Since all **agricultural land** along the Project route is considered irrigated fields, the 2025 unit land value ("*rayiç*") for irrigated land has been determined as **15.73 TL/m²** in all districts by the respective municipal real estate departments. Based on this, the **title deed fee cost** per square meter of expropriated land in the relevant districts would be **0.629 TL/m²** (629 TL per decare).

  Along the route, there are **zoned parcels** (classified as constructible plots) in the **Cumali, Serik; Evren and Ilica, Manavgat;** and **Telatiye, Alanya,** as discussed in Section 2.9**.** The municipal unit values for constructible plots in these neighborhoods were obtained from the relevant municipal real estate departments (e.g. Telatiye (Konakli), Alanya: ranges between 279.95 TL/m² and 1,272.47 TL/m²)

- **Revolving fund fee** (**"***döner sermaye harcı*")**:** The Title Deed Directorates of the mentioned districts have indicated that the **revolving fund fee** is **5,251 TL**.

RAP Fund Implementation Procedure

- A RAP Fund Implementation Procedure will be prepared by the SPV following the approval of this RAP. It will be submitted to Lenders for approval and put in place following their approval to ensure timely and fair delivery of payment items detailed under the RAP Fund.
- The objective of the RAP Fund Implementation Procedure will be to present the details of utilisation of RAP Fund implementation in a simple and concise document. The SPV will implement the RAP in line with the RAP Fund Implementation Procedure. This Procedure will be aligned with the up-to-date Expropriation Payment Programme of KGM and Construction Work Programme of the SPV and the EPC Contractor, and updated periodically in line with expropriation programme updates by KGM.
- A RAP Fund Management Database, consistent with the RAP Fund Implementation Procedure will also be established as part of implementation. The E&S Manager of the SPV will be responsible from keeping this database accurate and up-to-date with support from Project CLOs, Expropriation Manager, Finance Manager and other SPV and EPC departments as relevant. The documentation related to calculation of payments to be done from RAP Fund and evidence of payments and all relevant processes will be registered in this Database.
- The compensation and assistance to be provided by the SPV through the RAP Fund (on top of mandatory cash compensation to be provided in line with Expropriation Law) will be subject to approval of Senior Management Representatives in the SPV and the SPV – General Manager.
- Through monthly construction progress reports, the SPV will keep KGM informed about the RAP implementation progress and compensation and assistance provided through the RAP Fund. Specific requirements of KGM, if any, will be taken into consideration through a consultative process.

Table 16-1. Indicative Budget for RAP Fund

RAP Fund Items	KGM – Expropriation Budget (EUR)	SPV – RAP Fund (EUR)
(A) General	503,276,162.07	-
(1) Mandatory Cash Compensation as per Expropriation Law of Türkiye		-
- Lands	*456,508,098.04*	-
- Affected structures *(houses, greenhouses, business structures, all secondary structures)*	*32,151,898.32*	-
- Lands	*14,616,165.71*	-
(2) Top-up Cash Compensation to cover Depreciation Cost *(houses, greenhouses, business structures, secondary structures that are major fixed investments/improvements)*	-	9,645,569.50
(B) Affected Lands Including Greenhouses (1) Cash Compensation for Transaction Fees (title deed fee "*tapu harcı*"+ revolving fund fee "*döner sermaye*") (2) Top-up Cash Compensation for Affected Trees to Compensate Dense Planting Application of KGM (3) Livelihood Restoration, Improvement and Assistance (4) Moving support for Greenhouses and budget for compensating unforeseen costs (such as rearrangement of drainage investments and/or water resources and supply system for irrigation, rearranging the remaining part of the greenhouses in case of partial expropriation, compensation of rental fees paid in advance by long-term tenants or fees stemming from special formal tenancy agreement conditions: etc.) (5) Small costs in relation with Official Procedures for Land Acquisition	-	12,247,425.44
(C) Affected Houses (1) House Relocation Support Package (for renters and owners) (2) Moving and Travelling Allowance (for renters and owners) (3) Fund for unforeseen costs (for unforeseen additional houses, if any)	-	3,643,548.09
(D) Affected Businesses (1) External Business Advisory Services (administrative fees + site implementation support package) (2) Pre-relocation Financial Support Package (for renters and owners) (3) Cash compensation to cover cost of fixed investments/improvements (4) Moving allowance to cover disassembly, transportation and assembly (5) Business Relocation Support Package to cover other relocation-related expenses (for renters and owners) (6) Post-relocation Financial Support Package (for renters and owners) (7) Financial Support Package for Businesses Owners for Potential Shut-down Cases (8) Financial Support Package to Employees (Gross Salary) (9) Fund for unforeseen costs (for unforeseen additional businesses, if any)	-	7,525,441.76
(E) Vulnerable People	-	3,500,000.00
(F) Governance & Administrative Costs (1) Human Resources (Rap-specific Recuritment) (2) Equipment and Materials (mobile vehicles, printing, mobile phones, software) (3) RAP-specific Consultancy and Contractors (RAP implementation partners, third-party valuation experts, other consultancy)	-	2,124,000.00
(G) External Rap Monitoring (1) Periodic External Compliance Reviews (2) RAP Completion Audit	-	663,000.00
Total (A) + (B) + (C) + (D) + (E) + (F) + (G)		**39,348,984.79**
Contingency (15%)	-	5,902,347.72
RAP Fund - Grand Total (including contingency)	**-**	**45,251,332.51**

APPENDICES

Appendix A – Engineering Structures

A.1. List of Overpasses

No	District	Settlement	Location	Road KM	Length (m)	Width (m)	Total Area (m^2)
1	Manavgat	Hocalar	Manavgat Main Road	67+076	46	10	460
2	Manavgat	Hocalar	Manavgat Main Road	68+468	46	10	460
3	Manavgat	Hocalar	Manavgat Main Road	68+758	46	10	460
4	Manavgat	Yavrudoğan	Manavgat Main Road	71+832	46	10	460
5	Manavgat	Çolaklı	Manavgat Main Road	73+738	50	10	500
6	Manavgat	Kalemler	Manavgat Main Road	76+265	50	10	500
7	Manavgat	Yeniköy	Manavgat Main Road	78+831	60	10	600
8	Manavgat	Seki	Manavgat Main Road	81+058	54	10	540
9	Manavgat	Evrenleryavşi	Manavgat Main Road	81+930	46	10	460
10	Manavgat	Yukarıışıklar	Manavgat Main Road	83+047	62	10	620
11	Manavgat	Yukarıışıklar	Manavgat Main Road	83+278	104	10	1.040
12	Manavgat	Bucakşeyhler	Manavgat Main Road	86+272	46	10	460
13	Manavgat	Bucakşeyhler	Manavgat Main Road	86+960	46	10	460
14	Manavgat	Bucakşeyhler	Manavgat Main Road	87+511	48	10	480
15	Manavgat	Ulukapı	Manavgat Main Road	90+100	52	10	520
16	Manavgat	Aşağıışıklar	Manavgat Main Road	91+076	52	10	520
17	Manavgat	Aşağıışıklar	Manavgat Main Road	92+658	46	10	460
18	Manavgat	Demirciler	Manavgat Main Road	93+097	45	10	450
19	Manavgat	Karaöz	Manavgat Main Road	93+917	46	10	460
20	Manavgat	Karaöz	Manavgat Main Road	94+524	44	10	440
21	Manavgat	Aksaz	Manavgat Main Road	95+450	48	10	480
22	Manavgat	Hacıali	Manavgat Main Road	97+583	74	10	740
23	Manavgat	Sülek/Hacıisali	Manavgat Main Road	100+140	63	10	630
24	Manavgat	Hacıobası	Manavgat Main Road	102+450	50	10	500
25	Manavgat	Uzunlar	Manavgat Main Road	104+886	125	10	1.250
26	Manavgat	Uzunlar	Manavgat Main Road	106+707	51	10	510
27	Manavgat	Kadılar	Manavgat Main Road	108+022	46	10	460
28	Manavgat	Örenşehir	Manavgat Main Road	110+824	46	10	460
29	Alanya	Çakallar/Alara	Alanya Main Road	116+516	45	10	450
30	Alanya	Avsallar	Alanya Main Road	120+768	70	10	700
31	Alanya	Akdam	Alanya Main Road	126+462	70	10	700
32	Alanya	Akdam	Alanya Main Road	126+972	48	10	480
33	Alanya	Türkler	Alanya Main Road	130+008	52	10	520
34	Alanya	Emişbeleni	Alanya Main Road	132+718	71	10	710
35	Alanya	Toslak	Alanya Main Road	135+904	64	10	640
36	Alanya	Toslak	Alanya West Connection Road	136+433	93	10	930
37	Alanya	Toslak	Alanya West Connection Road	138+270	44	10	440
38	Alanya	Toslak/Elikesik	Alanya West Connection Road	138+838	46	10	460

No	District	Settlement	Location	Road KM	Length (m)	Width (m)	Total Area (m^2)
39	Alanya	Telatiye	Alanya West Connection Road	140+032	110	10	1.100
40	Alanya	Telatiye	Alanya West Connection Road	140+664	64	10	640
41	Serik	Sarıabalı	Serik Connection Road	1+427	49	10	490
42	Serik	Üründü	Serik Connection Road	2+670	42	10	420
43	Serik	Üründü	Serik Connection Road	4+863	36	10	360
44	Serik	Üründü	Serik Connection Road	5+401	40	10	400
45	Serik	Belpınar	Serik Connection Road	6+758	46	10	460
46	Serik	Cumalı	Serik Connection Road	9+963	36	10	360
47	Serik	Deniztepesi	Serik Connection Road/Motorway	52+324	80	10	800
48	Serik	Deniztepesi	Serik Connection Road	0+829	78	10	780
49	Manavgat	Taşağıl	Taşağıl Connection Road	1+204	56	10	560
50	Manavgat	Hacıobası	Taşağıl Connection Road	0+175	65	10	650
51	Manavgat	Taşağıl	Taşağıl Connection Road	0+877	54	10	540
52	Manavgat	Taşağıl	Taşağıl Connection Road	1+095	32	10	320
53	Manavgat	Kalemler	Manavgat Connection Road	1+915	46	10	460
54	Manavgat	Kalemler	Manavgat Connection Road	3+012	35	10	350
55	Manavgat	Kalemler	Manavgat Connection Road	4+553	36	10	360
56	Alanya	Alara	Alarahan Connection Road	1+119	114	10	1.140

A.2. List of Underpasses

No	District	Settlement	Location	Road KM	Dimensions (m)	Total Length (m)
1	Serik	Deniztepesi/ Sarıabalı	Serik Main Road	52+559	15 x 6	95.49
2	Serik	Sarıabalı	Serik Main Road	53+825	10 x 6	125.00
3	Serik	Sarıabalı	Serik Main Road	54+153	10 x 6	83.78
4	Manavgat	Taşağıl	Manavgat Main Road	58+560	13 x 6	200.04
5	Manavgat	Taşağıl	Manavgat Main Road	60+494	10 x 6	133.20
6	Manavgat	Taşağıl	Manavgat Main Road	62+606	12 x 6	101.73
7	Manavgat	Taşağıl	Manavgat Main Road	64+180	2 (13 x 6)	114.77
8	Manavgat	Hocalar	Manavgat Main Road	65+828	10 x 6	64.12
9	Manavgat	Hocalar	Manavgat Main Road	66+288	2 (15 x 6)	61.43
10	Manavgat	Hocalar	Manavgat Main Road	67+600	10 x 6	65.47
11	Manavgat	Çolaklı	Manavgat Main Road	73+012	10 x 6	74.50
12	Manavgat	Seki	Manavgat Main Road	74+963	12 x 6	96.86
13	Manavgat	Kalemler	Manavgat Main Road	77+028	2 (15 x 6)	57.72
14	Manavgat	Yeniköy	Manavgat Main Road	79+926	12 x 6	61.22
15	Manavgat	Dikmen	Manavgat Main Road	84+721	12 x 6	62.28
16	Manavgat	Aşağıışıklar	Manavgat Main Road	92+469	10 x 6	66.10
17	Manavgat	Hacıobası	Manavgat Main Road	103+903	10 x 6	66.36
18	Manavgat	Uzunlar	Manavgat Main Road	105+857	12 x 6	50.34
19	Manavgat	Kadılar	Manavgat Main Road	107+523	10 x 6	77.93
20	Manavgat	Kadılar	Manavgat Main Road	108+934	10 x 6	78.33
21	Manavgat	Kadılar	Manavgat Main Road	109+099	7 x 5.50	88.95
22	Manavgat	Kadılar	Manavgat Main Road	109+516	10 x 6	51.22
23	Manavgat	Yalçıdibi	Manavgat Main Road	111+447	7 x 5.50	69.98
24	Manavgat	Yalçıdibi	Manavgat Main Road	112+129	12 x 6	59.71
25	Manavgat	Yalçıdibi	Manavgat Main Road	112+653	10 x 6	57.42
26	Manavgat	Karakaya	Manavgat Main Road	113+957	10 x 6	54.99
27	Manavgat	Karakaya	Manavgat Main Road	115+166	12 x 6	63.20
28	Manavgat	Karakaya	Manavgat Main Road	115+469	10 x 6	89.51
29	Alanya	Çakallar	Alanya Main Road	116+148	13 x 6	106.03
30	Alanya	Çakallar/Alara	Alanya Main Road	117+001	10 x 6	47.47
31	Alanya	Çakallar/ Avsallar	Alanya Main Road	119+066	10 x 6	73.33
32	Alanya	Avsallar	Alanya Main Road	124+241	12 x 6	141.38
33	Alanya	Avsallar	Alanya Main Road	124+655	12 x 6	98.83
34	Alanya	Akdam	Alanya Main Road	125+763	10 x 6	117.72
35	Alanya	Elikesik	Alanya West Connection Road	139+630	10 x 6	110.13
36	Alanya	Telatiye	Alanya West Connection Road	140+982	2 (12 x 6)	53.74
37	Manavgat	Hocalar	Tasagil Connection Road	0+794	10 x 6	85.13
38	Manavgat	Taşağıl	Tasagil Connection Road	1+060	15 x 6	56.43
39	Manavgat	Taşağıl	Tasagil Connection Road	0+608	15 x 6	92.07
40	Manavgat	Kalemler	Manavgat Connection Road	1+508	10 x 6	73.44
41	Manavgat	Hacıobası	Manavgat East Connection Road	3+051	12 x 6	82.71
42	Alanya	Alara	Alarahan Connection Road	0+444	10 x 6	95.49
43	Alanya	Alara	Alarahan Connection Road	0+882	12 x 6	125.00

A.3. List of Culverts

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
1	Serik	Sarıabalı	Serik Main Road	52+733	2	2	155.10
2	Serik	Sarıabalı	Serik Main Road	52+945	2	2	110.68
3	Serik	Sarıabalı	Serik Main Road	53+181	2	2	69.96
4	Serik	Sarıabalı	Serik Main Road	53+324	2	2	73.87
5	Serik	Sarıabalı	Serik Main Road	53+455	2	2	69.72
6	Serik	Sarıabalı	Serik Main Road	53+544	2	2	73.80
7	Serik	Sarıabalı	Serik Main Road	53+772	3	3	174.91
8	Serik	Sarıabalı	Serik Main Road	54+180	2	2	90.72
9	Manavgat	Çakış	Manavgat Main Road	56+361	2	2	69.08
10	Manavgat	Çakış	Manavgat Main Road	56+614	2	2	65.98
11	Manavgat	Taşağıl	Manavgat Main Road	58+195	2	2	174.31
12	Manavgat	Taşağıl	Manavgat Main Road	58+585	3	3	227.98
13	Manavgat	Taşağıl	Manavgat Main Road	58+737	2	2	101.71
14	Manavgat	Taşağıl	Manavgat Main Road	59+603	2	2	56.32
15	Manavgat	Taşağıl	Manavgat Main Road	59+714	2	2	68.26
16	Manavgat	Taşağıl	Manavgat Main Road	60+305	2	2	193.45
17	Manavgat	Taşağıl	Manavgat Main Road	60+456	2	2	119.83
18	Manavgat	Taşağıl	Manavgat Main Road	60+647	2	2	126.82
19	Manavgat	Taşağıl	Manavgat Main Road	60+751	2	2	168.23
20	Manavgat	Taşağıl	Manavgat Main Road	60+899	2	2	93.83
21	Manavgat	Taşağıl	Manavgat Main Road	62+691	5	5	104.76
22	Manavgat	Taşağıl	Manavgat Main Road	63+065	5	5	79.39
23	Manavgat	Taşağıl	Manavgat Main Road	63+297	5	5	73.86
24	Manavgat	Taşağıl	Manavgat Main Road	63+433	2	2	62.04
25	Manavgat	Taşağıl	Manavgat Main Road	64+139	4	4	96.18
26	Manavgat	Taşağıl	Manavgat Main Road	64+216	2	2	110.90
27	Manavgat	Taşağıl	Manavgat Main Road	64+749	2	2	106.30
28	Manavgat	Taşağıl	Manavgat Main Road	65+010	2	2	117.63
29	Manavgat	Hocalar	Manavgat Main Road	65+968	4	4	186.96
30	Manavgat	Hocalar	Manavgat Main Road	66+057	5	5	181.93
31	Manavgat	Hocalar	Manavgat Main Road	66+372	2	2	60.39
32	Manavgat	Hocalar	Manavgat Main Road	66+697	2	2	78.57
33	Manavgat	Hocalar	Manavgat Main Road	67+000	2	2	48.84
34	Manavgat	Hocalar	Manavgat Main Road	67+297	3	3	68.41
35	Manavgat	Hocalar	Manavgat Main Road	67+550	2	2	78.58
36	Manavgat	Hocalar	Manavgat Main Road	67+901	2	2	74.61
37	Manavgat	Hocalar	Manavgat Main Road	68+538	3	3	96.69
38	Manavgat	Hocalar	Manavgat Main Road	68+910	4	4	150.88
39	Manavgat	Hocalar	Manavgat Main Road	69+076	2	2	56.36
40	Manavgat	Hocalar	Manavgat Main Road	69+389	2	2	46.26
41	Manavgat	Gündoğdu	Manavgat Main Road	69+779	2	2	123.04
42	Manavgat	Gündoğdu	Manavgat Main Road	69+872	2	2	159.01
43	Manavgat	Yavrudoğan	Manavgat Main Road	70+859	2	2	88.42
44	Manavgat	Yavrudoğan	Manavgat Main Road	71+605	2	2	90.54
45	Manavgat	Yavrudoğan	Manavgat Main Road	71+912	2	2	58.36
46	Manavgat	Yavrudoğan	Manavgat Main Road	72+181	3	3	116.69
47	Manavgat	Yavrudoğan/ Çolaklı	Manavgat Main Road	72+711	2	2	76.51
48	Manavgat	Çolaklı	Manavgat Main Road	72+969	3	3	117.75
49	Manavgat	Çolaklı	Manavgat Main Road	73+426	2	2	132.44
50	Manavgat	Çolaklı	Manavgat Main Road	73+920	2	2	188.51
51	Manavgat	Seki	Manavgat Main Road	74+170	2	2	164.57

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
52	Manavgat	Seki	Manavgat Main Road	74+939	5	5	78.99
53	Manavgat	Seki	Manavgat Main Road	74+963	2	2	9.64
54	Manavgat	Seki	Manavgat Main Road	75+098	2	2	139.14
55	Manavgat	Seki	Manavgat Main Road	75+418	3	3	123.08
56	Manavgat	Seki	Manavgat Main Road	75+603	2	2	106.42
57	Manavgat	Kalemler	Manavgat Main Road	75+759	3	3	181.48
58	Manavgat	Kalemler	Manavgat Main Road	75+834	2	2	187.60
59	Manavgat	Kalemler	Manavgat Main Road	76+005	2	2	173.19
60	Manavgat	Kalemler	Manavgat Main Road	76+169	2	2	108.44
61	Manavgat	Kalemler	Manavgat Main Road	76+855	2	2	110.78
62	Manavgat	Kalemler	Manavgat Main Road	77+108	2	2	119.81
63	Manavgat	Kalemler	Manavgat Main Road	77+357	2	2	124.30
64	Manavgat	Kalemler	Manavgat Main Road	77+630	2	2	54.55
65	Manavgat	Yeniköy	Manavgat Main Road	78+674	2	2	88.65
66	Manavgat	Yeniköy	Manavgat Main Road	79+826	2	2	94.69
67	Manavgat	Seki	Manavgat Main Road	79+946	2	2	66.42
68	Manavgat	Evrenleryavşi	Manavgat Main Road	81+670	3	3	48.26
69	Manavgat	Evrenleryavşi	Manavgat Main Road	82+095	2	2	52.25
70	Manavgat	Evrenleryavşi	Manavgat Main Road	82+425	2	2	99.80
71	Manavgat	Evrenleryavşi	Manavgat Main Road	82+830	5	5	64.49
72	Manavgat	Yukarıışıklar	Manavgat Main Road	83+125	2	2	72.49
73	Manavgat	Yukarıışıklar	Manavgat Main Road	83+514	2	2	66.43
74	Manavgat	Yukarıışıklar	Manavgat Main Road	83+609	2	2	52.39
75	Manavgat	Yukarıışıklar	Manavgat Main Road	83+790	2	2	58.39
76	Manavgat	Yukarıışıklar	Manavgat Main Road	84+525	3	3	104.84
77	Manavgat	Dikmen	Manavgat Main Road	84+751	2	2	68.10
78	Manavgat	Dikmen	Manavgat Main Road	85+060	2	2	72.03
79	Manavgat	Bucakşeyhler	Manavgat Main Road	86+893	2	2	91.83
80	Manavgat	Bucakşeyhler	Manavgat Main Road	87+029	2	2	92.56
81	Manavgat	Ulukapı	Manavgat Main Road	89+718	2	2	112.86
82	Manavgat	Ulukapı	Manavgat Main Road	89+900	3	3	88.68
83	Manavgat	Ulukapı	Manavgat Main Road	90+156	2	2	52.26
84	Manavgat	Aşağıışıklar	Manavgat Main Road	90+387	5	5	70.64
85	Manavgat	Aşağıışıklar	Manavgat Main Road	90+955	2	2	223.77
86	Manavgat	Aşağıışıklar	Manavgat Main Road	91+515	3	3	147.31
87	Manavgat	Aşağıışıklar	Manavgat Main Road	91+830	2	2	157.23
88	Manavgat	Aşağıışıklar	Manavgat Main Road	92+527	3	3	157.29
89	Manavgat	Aşağıışıklar	Manavgat Main Road	92+863	2	2	192.05
90	Manavgat	Demirciler	Manavgat Main Road	93+379	2	2	66.31
91	Manavgat	Karaöz	Manavgat Main Road	94+006	2	2	124.88
92	Manavgat	Karaöz	Manavgat Main Road	94+998	2	2	132.77
93	Manavgat	Aksaz	Manavgat Main Road	95+257	2	2	84.45
94	Manavgat	Hacıali	Manavgat Main Road	97+150	2	2	134.47
95	Manavgat	Sülek	Manavgat Main Road	99+113	2	2	48.20
96	Manavgat	Sülek	Manavgat Main Road	99+181	2	2	62.40
97	Manavgat	Sülek	Manavgat Main Road	99+678	2	2	72.42
98	Manavgat	Hacıisali/Sülek	Manavgat Main Road	100+301	3	3	229.84
99	Manavgat	Hacıisali	Manavgat Main Road	100+364	2	2	108.60
100	Manavgat	Hacıisali	Manavgat Main Road	100+598	2	2	138.77
101	Manavgat	Hacıisali	Manavgat Main Road	100+952	2	2	185.52
102	Manavgat	Hacıobası	Manavgat Main Road	101+883	2	2	167.06
103	Manavgat	Hacıobası	Manavgat Main Road	102+108	2	2	145.01
104	Manavgat	Hacıobası	Manavgat Main Road	102+196	2	2	92.60
105	Manavgat	Hacıobası	Manavgat Main Road	103+569	2	2	60.36

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
106	Manavgat	Hacıobası	Manavgat Main Road	103+922	2	2	74.58
107	Manavgat	Uzunlar	Manavgat Main Road	105+762	2	2	98.73
108	Manavgat	Uzunlar	Manavgat Main Road	105+971	2	2	84.06
109	Manavgat	Kadılar	Manavgat Main Road	107+284	2	2	46.23
110	Manavgat	Kadılar	Manavgat Main Road	107+423	2	2	56.26
111	Manavgat	Kadılar	Manavgat Main Road	107+777	4	4	64.29
112	Manavgat	Kadılar	Manavgat Main Road	108+881	2	2	50.38
113	Manavgat	Kadılar	Manavgat Main Road	109+025	2	2	68.48
114	Manavgat	Kadılar	Manavgat Main Road	109+138	7	5	107.06
115	Manavgat	Kadılar	Manavgat Main Road	109+352	2	2	73.79
116	Manavgat	Kadılar/Örenşehir	Manavgat Main Road	109+914	2	2	54.17
117	Manavgat	Örenşehir	Manavgat Main Road	110+128	2	2	88.48
118	Manavgat	Örenşehir	Manavgat Main Road	110+371	2	2	132.84
119	Manavgat	Örenşehir	Manavgat Main Road	110+531	2	2	153.14
120	Manavgat	Yalçıdibi	Manavgat Main Road	111+294	2	2	112.72
121	Manavgat	Yalçıdibi	Manavgat Main Road	111+537	2	2	116.76
122	Manavgat	Yalçıdibi	Manavgat Main Road	111+823	2	2	116.69
123	Manavgat	Yalçıdibi	Manavgat Main Road	112+183	3	3	118.85
124	Manavgat	Yalçıdibi	Manavgat Main Road	112+385	3	3	30.30
125	Manavgat	Yalçıdibi	Manavgat Main Road	112+619	2	2	81.74
126	Manavgat	Yalçıdibi	Manavgat Main Road	112+901	3	3	135.03
127	Manavgat	Yalçıdibi/Odaönü	Manavgat Main Road	113+572	3	3	379.12
128	Manavgat	Karakaya	Manavgat Main Road	113+782	5	5	112.25
129	Manavgat	Karakaya	Manavgat Main Road	114+516	2	2	58.51
130	Manavgat	Karakaya	Manavgat Main Road	114+775	2	2	50.34
131	Manavgat	Karakaya	Manavgat Main Road	115+656	2	2	70.49
132	Alanya	Çakallar/Alara	Alanya Main Road	116+574	2	2	68.01
133	Alanya	Çakallar/Alara	Alanya Main Road	116+916	2	2	102.81
134	Alanya	Alara	Alanya Main Road	117+262	2	2	104.82
135	Alanya	Alara	Alanya Main Road	117+424	5	5	152.15
136	Alanya	Çakallar	Alanya Main Road	117+815	2	2	116.51
137	Alanya	Çakallar	Alanya Main Road	118+414	2	2	42.26
138	Alanya	Çakallar	Alanya Main Road	118+741	2	2	58.18
139	Alanya	Çakallar/Alara	Alanya Main Road	118+938	2	2	69.77
140	Alanya	Çakallar/Alara	Alanya Main Road	118+938	2	2	40.22
141	Alanya	Çakallar/Alara	Alanya Main Road	119+057	2	2	114.92
142	Alanya	Avsallar/Alara	Alanya Main Road	119+418	15	6	148.03
143	Alanya	Avsallar	Alanya Main Road	119+982	2	2	125.66
144	Alanya	Avsallar	Alanya Main Road	120+118	2	2	54.03
145	Alanya	İncekum	Alanya Main Road	121+077	2	2	42.26
146	Alanya	İncekum	Alanya Main Road	121+206	2	2	78.22
147	Alanya	Avsallar	Alanya Main Road	122+579	2	2	160.01
148	Alanya	Avsallar	Alanya Main Road	123+024	3	3	191.45
149	Alanya	Avsallar	Alanya Main Road	123+652	2	2	52.37
150	Alanya	Avsallar	Alanya Main Road	124+071	2	2	73.79
151	Alanya	Avsallar	Alanya Main Road	124+199	2	2	96.35
152	Alanya	Avsallar	Alanya Main Road	124+403	2	2	138.65
153	Alanya	Avsallar	Alanya Main Road	124+696	3	3	116.88
154	Alanya	Akdam	Alanya Main Road	125+378	2	2	191.37
155	Alanya	Akdam	Alanya Main Road	125+681	2	2	178.72
156	Alanya	Akdam	Alanya Main Road	126+098	3	3	193.53
157	Alanya	Akdam	Alanya Main Road	126+647	2	2	66.49
158	Alanya	Akdam	Alanya Main Road	127+116	2	2	77.75
159	Alanya	Türkler	Alanya Main Road	128+260	2	2	143.57

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
160	Alanya	Türkler	Alanya Main Road	129+239	2	2	128.76
161	Alanya	Türkler	Alanya Main Road	129+479	2	2	99.73
162	Alanya	Türkler	Alanya Main Road	129+655	2	2	84.23
163	Alanya	Türkler	Alanya Main Road	129+829	2	2	72.41
164	Alanya	Türkler	Alanya Main Road	130+253	2	2	106.51
165	Alanya	Türkler	Alanya Main Road	130+393	2	2	86.66
166	Alanya	Türkler	Alanya Main Road	130+645	2	2	112.06
167	Alanya	Türkler	Alanya Main Road	130+930	2	2	121.98
168	Alanya	Türkler	Alanya Main Road	131+182	2	2	125.86
169	Alanya	Türkler	Alanya Main Road	131+335	2	2	126.97
170	Alanya	Türkler	Alanya Main Road	131+416	2	2	181.05
171	Alanya	Türkler	Alanya Main Road	131+762	2	2	62.28
172	Alanya	Payallar	Alanya Main Road	131+958	2	2	177.20
173	Alanya	Payallar	Alanya Main Road	132+056	2	2	135.16
174	Alanya	Payallar	Alanya Main Road	132+308	2	2	177.66
175	Alanya	Payallar	Alanya Main Road	132+421	2	2	174.68
176	Alanya	Emişbeleni	Alanya Main Road	132+751	2	2	62.49
177	Alanya	Emişbeleni	Alanya Main Road	133+128	2	2	120.87
178	Alanya	Emişbeleni	Alanya Main Road	133+283	2	2	76.62
179	Alanya	Emişbeleni	Alanya Main Road	133+494	2	2	88.53
180	Alanya	Emişbeleni	Alanya Main Road	133+563	3	3	84.62
181	Alanya	Emişbeleni	Alanya Main Road	134+055	2	2	54.39
182	Alanya	Emişbeleni	Alanya Main Road	134+304	2	2	74.54
183	Alanya	Emişbeleni	Alanya Main Road	135+092	2	2	100.30
184	Alanya	Emişbeleni	Alanya Main Road	135+324	2	2	217.70
185	Alanya	Emişbeleni/Toslak	Alanya Main Road	135+594	2	2	330.79
186	Alanya	Toslak	Alanya Main Road	135+794	2	2	146.84
187	Alanya	Toslak	Alanya Main Road	135+984	2	2	145.68
188	Alanya	Toslak	Alanya West Connection Road	136+376	2	2	76.25
189	Alanya	Toslak	Alanya West Connection Road	136+919	2	2	70.49
190	Alanya	Toslak	Alanya West Connection Road	137+503	5	5	221.90
191	Alanya	Toslak	Alanya West Connection Road	138+035	3	3	124.82
192	Alanya	Toslak/Elikesik	Alanya West Connection Road	138+471	2	2	88.72
193	Alanya	Toslak/Elikesik	Alanya West Connection Road	138+676	2	2	84.59
194	Alanya	Toslak	Alanya West Connection Road	139+232	3	3	38.26
195	Alanya	Elikesik	Alanya West Connection Road	139+613	2	2	114.87
196	Alanya	Telatiye	Alanya West Connection Road	140+135	2	2	40.78
197	Alanya	Telatiye	Alanya West Connection Road	140+498	5	5	63.38
198	Alanya	Telatiye	Alanya West Connection Road	140+849	2	2	136.91
199	Alanya	Telatiye	Alanya West Connection Road	141+169	2	2	110.65
200	Alanya	Telatiye	Alanya West Connection Road	141+452	2	2	72.49
201	Serik	Deniztepesi	Serik Connection Road	0+959	2	2	135.18
202	Serik	Deniztepesi	Serik Connection Road	1+072	2	2	64.37
203	Serik	Sarıabalı	Serik Connection Road	1+082	2	2	66.49
204	Serik	Sarıabalı	Serik Connection Road	1+426	2	2	23.79
205	Serik	Sarıabalı	Serik Connection Road	1+617	2	2	88.34
206	Serik	Üründü	Serik Connection Road	2+435	2	2	90.68
207	Serik	Üründü	Serik Connection Road	2+671	2	2	22.02
208	Serik	Üründü	Serik Connection Road	2+846	2	2	76.57
209	Serik	Üründü	Serik Connection Road	2+938	3	3	64.46
210	Serik	Üründü	Serik Connection Road	3+493	2	2	96.67
211	Serik	Üründü	Serik Connection Road	0+320	2	2	50.36
212	Serik	Üründü	Serik Connection Road	0+078	2	2	34.13
213	Serik	Üründü	Serik Connection Road	4+048	2	2	58.42

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
214	Serik	Üründü	Serik Connection Road	4+616	10	4	34.33
215	Serik	Üründü	Serik Connection Road	4+868	2	2	33.22
216	Serik	Üründü	Serik Connection Road	4+880	2	2	36.16
217	Serik	Üründü	Serik Connection Road	5+677	2	2	64.49
218	Serik	Belpınar	Serik Connection Road	6+124	2	2	34.16
219	Serik	Belpınar	Serik Connection Road	6+334	2	2	46.39
220	Serik	Belpınar	Serik Connection Road	6+474	2	2	42.23
221	Serik	Belpınar	Serik Connection Road	6+760	2	2	46.25
222	Serik	Belpınar	Serik Connection Road	6+999	2	2	54.36
223	Serik	Belpınar	Serik Connection Road	7+105	2	2	50.24
224	Serik	Belpınar	Serik Connection Road	0+197	2	2	60.36
225	Serik	Belpınar	Serik Connection Road	0+535	2	2	52.36
226	Serik	Belpınar	Serik Connection Road	0+066	2	2	18.02
227	Serik	Belpınar	Serik Connection Road	0+068	2	2	26.14
228	Serik	Belpınar	Serik Connection Road	7+867	2	2	62.46
229	Serik	Belpınar	Serik Connection Road	8+410	2	2	46.24
230	Serik	Cumalı	Serik Connection Road	9+643	2	2	40.26
231	Serik	Cumalı	Serik Connection Road	9+964	2	2	34.14
232	Serik	Cumalı	Serik Connection Road	9+972	2	2	34.09
233	Serik	Cumalı	Serik Connection Road	10+590	2	2	40.25
234	Serik	Cumalı/Aşağıçatma	Serik Connection Road	0+266	2	2	82.62
235	Serik	Cumalı/Aşağıçatma	Serik Connection Road	0+444	2	2	32.16
236	Serik	Aşağıçatma	Serik Connection Road	11+435	2	2	60.37
237	Serik	Çandır	Serik Connection Road	2+980	10	5	10.00
238	Serik	Karaburnu	Serik Connection Road	6+905	2	2	42.97
239	Serik	Yukarıkocayatak	Serik Connection Road	7+427	2	2	37.62
240	Serik	Yukarıkocayatak	Serik Connection Road	7+864	2	2	55.71
241	Serik	Yukarıkocayatak	Serik Connection Road	9+460	5	5	10.00
242	Serik	Yukarıkocayatak	Serik Connection Road	9+904	7	5	10.00
243	Manavgat	Hocalar	Tasagil Connection Road	0+137	4	4	115.40
244	Manavgat	Hocalar	Tasagil Connection Road	0+072	5	5	102.67
245	Manavgat	Hocalar	Tasagil Connection Road	0+255	2	2	71.78
246	Manavgat	Hocalar	Tasagil Connection Road	0+317	2	2	22.14
247	Manavgat	Hocalar	Tasagil Connection Road	0+724	7	5	147.88
248	Manavgat	Taşağıl	Tasagil Connection Road	1+363	2	2	60.54
249	Manavgat	Taşağıl	Tasagil Connection Road	1+801	2	2	50.46
250	Manavgat	Taşağıl	Tasagil Connection Road	0+274	2	2	71.83
251	Manavgat	Taşağıl	Tasagil Connection Road	0+200	2	2	18.14
252	Manavgat	Taşağıl	Tasagil Connection Road	0+208	2	2	32.24
253	Manavgat	Taşağıl	Tasagil Connection Road	0+239	4	4	23.28
254	Manavgat	Taşağıl	Tasagil Connection Road	2+161	4	4	59.91
255	Manavgat	Hocalar	Tasagil Connection Road	0+800	5	3	43.70
256	Manavgat	Taşağıl	Tasagil Connection Road	0+194	5	3	75.10
257	Manavgat	Taşağıl	Tasagil Connection Road	0+381	2	2	32.24
258	Manavgat	Taşağıl	Tasagil Connection Road	0+665	2	2	46.36
259	Manavgat	Taşağıl	Tasagil Connection Road	0+912	2	2	36.24
260	Manavgat	Taşağıl	Tasagil Connection Road	1+405	2	2	40.38
261	Manavgat	Taşağıl	Tasagil Connection Road	1+680	2	2	34.24
262	Manavgat	Taşağıl	Tasagil Connection Road	1+782	2	2	32.24
263	Manavgat	Hocalar	Tasagil Connection Road	0+049	9	5	47.90
264	Manavgat	Kalemler	Manavgat Connection Road	0+167	2	2	85.23
265	Manavgat	Kalemler	Manavgat Connection Road	0+455	2	2	137.62
266	Manavgat	Kalemler	Manavgat Connection Road	1+896	7	5	44.74
267	Manavgat	Kalemler	Manavgat Connection Road	2+973	7	5	37.42

No	District	Settlement	Location	Road KM	Width (m)	Height (m)	Length (m)
268	Manavgat	Kalemler	Manavgat Connection Road	4+269	12	5	59.21
269	Manavgat	Kalemler	Manavgat Connection Road	5+305	12	5	99.46
270	Manavgat	Evren	Manavgat Connection Road	0+137	2	2	31.79
271	Manavgat	Ilıca	Manavgat Connection Road	0+290	2	2	41.34
272	Manavgat	Ilıca	Manavgat Connection Road	0+181	12	5	32.50
273	Manavgat	Evren	Manavgat Connection Road	0+333	2	2	30.19
274	Manavgat	Evren	Manavgat Connection Road	0+630	2	2	39.55
275	Manavgat	Evren	Manavgat Connection Road	0+522	12	5	19.41
276	Manavgat	Evren	Manavgat Connection Road	0+245	2	2	47.33
277	Manavgat	Evren	Manavgat Connection Road	0+159	2	2	37.86
278	Manavgat	Evren	Manavgat Connection Road	0+600	5	5	29.11
279	Manavgat	Hacıobası	Manavgat East Connection	0+232	2	2	65.86
280	Manavgat	Hacıobası	Manavgat East Connection	1+854	2	2	98.01
281	Manavgat	Hacıobası	Manavgat East Connection	2+079	2	2	116.54
282	Manavgat	Hacıobası	Manavgat East Connection	2+278	2	2	78.28
283	Manavgat	Hacıobası	Manavgat East Connection	2+478	2	2	86.56
284	Manavgat	Hacıobası	Manavgat East Connection	2+821	2	2	90.47
285	Manavgat	Hacıobası	Manavgat East Connection	3+218	4	4	66.18
286	Manavgat	Hacıobası	Manavgat East Connection	0+733	2	2	34.81
287	Manavgat	Hacıobası	Manavgat East Connection	0+244	2	2	26.70
288	Manavgat	Hacıobası	Manavgat East Connection	0+374	2	2	60.40
289	Manavgat	Hacıobası	Manavgat East Connection	0+308	2	2	34.16
290	Manavgat	Hacıobası	Manavgat East Connection	0+324	2	2	44.25
291	Alanya	Alara	Alarahan Connection Road	0+362	2	2	56.35
292	Alanya	Çakallar	Alarahan Connection Road	0+069	2	2	48.26
293	Alanya	Alara	Alarahan Connection Road	0+472	2	2	69.40
294	Alanya	Alara	Alarahan Connection Road	0+937	2	2	106.83
295	Alanya	Alara	Alarahan Connection Road	1+226	2	2	50.30
296	Alanya	Alara	Alarahan Connection Road	1+885	2	2	120.70
297	Alanya	Alara	Alarahan Connection Road	2+150	2	2	60.20
298	Alanya	Alara	Alarahan Connection Road	2+393	2	2	50.83
299	Alanya	Alara	Alarahan Connection Road	2+503	2	2	46.05
300	Alanya	Alara	Alarahan Connection Road	0+193	2	2	26.16
301	Alanya	Emişbeleni	Konaklı Connection Road	0+326	2	2	66.45
302	Alanya	Emişbeleni	Konaklı Connection Road	0+384	2	2	45.90
303	Alanya	Emişbeleni	Konaklı Connection Road	0+474	2	2	44.98
304	Alanya	Emişbeleni	Konaklı Connection Road	0+451	4	4	81.81
305	Alanya	Emişbeleni	Konaklı Connection Road	1+544	2	2	34.16
306	Alanya	Emişbeleni	Konaklı Connection Road	0+292	2	2	39.82
307	Alanya	Emişbeleni	Konaklı Connection Road	0+428	2	2	36.12
308	Alanya	Emişbeleni	Konaklı Connection Road	1+103	2	2	32.68

Appendix B – Relevant Legislation and Procedures

B.1 – Relevant Articles of the Expropriation Law of Türkiye (No. 2942, 1983)

Article	Definition
Article 3 - Requirements for Expropriation	For the implementation of large projects that concern issues such as energy, irrigation and afforestation etc., administrations may expropriate by paying the fee for the immovables, resources and their easement rights in cash or as down payment in equal instalments, as required for the conduct of public services or interventions they are obliged to provide according to laws.
Article 4 – Constitution of Servitude (Easement Rights)	Instead of expropriating the ownership of the immovables, easement right can be established by expropriation on a certain section, height, depth or source of the immovable if it is sufficient for the purpose. However, provided that the use of the property right of the owners is not hindered and necessary measures are taken in terms of safety of life and property, transportation lines such as cable cars and all kinds of bridges can be built on the immovable, subway and similar rail transport systems and tunnels can be built under the immovables based on the public benefit. In case the use of the right of ownership of the immovables is not prevented, no expropriation of the immovables shall be made. No value increase fee can be collected from the owners of the real estate due to the investment made.
Article 5 –Authorities that Decide on Public Benefit	This article specifies the competent authorities that can take the public benefit decision. In case of the Project, public benefit decision was declared by MoTI in August 2016.
Article 7 – Procedures to be Completed Prior to Expropriation and Administrative Annotation	The administration responsible from the execution of the expropriation process prepares or commissions a scaled plan indicating the borders, surface area and type of the immovable assets of resources on which expropriation is to be conducted or servitude (easement rights) to be constituted by way of expropriation, enables that the owners of the expropriated immovable asset, the ownerships if no title deed registrations are present and their addresses by binding them to documents through an inquiry it would conduct on the land registry, tax and civil registry records as well as additional inquiries. After the administration takes the decision on expropriation, the related annotation of the expropriation in the title deed is notified to the title deed administration where the mentioned immovable asset is registered. If the owner changes after the notification date, the title deed administration is obliged to notify the administration of any changes to occur in the ownership or in the rights in kind that are separate from the ownership. If the document to be obtained from the court indicating that a request for the identification of the expropriation fee and the registration in the name of the administration as per the Article 10 is not submitted to the title deed administration within six months starting on the annotation date, this annotation is ex officio deleted from the title deed records.
Article 8 – Purchase Method	According to the Law, the administrations shall apply the negotiated purchase method in the first place for the expropriations of the immovable properties registered in the title deed. Following the expropriation decision, the administration to expropriate shall determine the estimated value of the immovable property by assigning one or more in-house valuation commissions consisting of at least three persons in accordance with the principles of Article 11 of this Law and by obtaining reports from experts, institutions or organisations related to the subject, and making use of the information to be obtained from the Chambers of Industry and Commerce and local real estate offices, if required. Moreover, the administration shall assign one or more reconciliation commissions that consist of at least three people to carry out and finalise the negotiations over the estimated price.
Article 10 – Identification of the Expropriation Fee by Court and Registration of Immovable in the	If the expropriation cannot be realised through procurement, the administration applies to the court of first instance in the locale of the immovable and requests that the expropriation fee for the immovable asset be identified and decision be made for its registration in the name of the administration in return for the payment of this fee.

Article	Definition
Name of the Administration	Within 30 days of the application of the administration, the Court notifies the owner of the immovables through an annotated invitation on the date of hearing. To those whose addresses could not be found after inquiries an announcement is made according to Notification Law (Law No. 7201) inviting them to attend the hearing. The Court also publishes information on the expropriation at least once in a local newspaper (if there is any) issued in the location of the immovable and in one of the newspapers circulated across Türkiye. On the day of the hearing, the judge invites the parties to reach an agreement on the value of the immovable. If an agreement is reached, the judge considers this fee to be the expropriation fee. In cases where an agreement is not reached, the judge schedules an expedition (within ten days) to identify the value of the immovable asset and a date for the second hearing (within thirty days after the expedition). On the second hearing, if the parties fail to agree on the value once again, the judge will assign a new expert committee for the valuation within fifteen days and then identifies a fair and equitable expropriation fee by referencing both the reports and statements of the parties and experts. The identified fee is the expropriation fee of the immovable, resource or its easement rights. The Court grants fifteen days to the administration for the fee to be deposited in a bank on behalf of the owner. In cases where the right holder could not be identified, the court decides on the registration of the immovable in the name of the administration under the circumstances that the bank receipt indicating the amount was blocked to be given to the right holder to be revealed in the future and that this decision is notified to the title deed department and the bank where the fee was deposited. The provision on registration is definitive and the parties reserve their rights for appeal pertaining to the fee.
Article 11 – Principles for the Determination of the Expropriation Fee	The panel of experts to be established in accordance with Article 15 shall visit the location of the immovable property or resource to be expropriated, together with the court committee, and after listening to the relevant persons present, they shall prepare a report based on; a) Sort and type b) Surface area c) All features and components that may add to its value and the value of each element separately d) Tax declaration, if any e) Valuations by the authorities on the expropriation date f) The net income the immovable property or resource on the agricultural lands shall bring if it is used as is and according to their locations and conditions g) For residential plots, the sales value according to the precedent sales without a special purpose before the expropriation day, h) For buildings, official unit prices and building cost calculations and depreciation i) Other objective criteria that shall be effective in determining the price, provided that the effect of each measure is explained which includes the answers to all these factors separately and the panel determines the value of the immovable property based on a reasoned evaluation report in accordance with the valuation standards accepted by the Capital Markets Board of Türkiye and by taking into account the statements of the relevant parties. As part of the constitution of servitude (easement rights), any decrease in the value of the immovable or the resource due to expropriation will be justified in the valuation. This decrease in value is the expropriation cost.
Article 12 – Partial Expropriation	Value of partially expropriated immovable property refers to; a) The amount of the expropriated part from the value appraised according to the principles specified in Article 11, unless the value of the unacquired part changes due to expropriation. b) The amount found by determining the amount of decreased value and adding the decreased value to the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is a decrease in the value of the unacquired part due to expropriation. c) The amount found by determining the amount of increased value and subtracting the increased value from the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is an increase in the value of the unacquired part due to expropriation.

Article	Definition
	Shall the remaining part of a partially expropriated immovable is not suitable for utilization, this part shall also be expropriated upon written application made by the legal owner within thirty days of the notification of the expropriation decision in cases where no lawsuits were filed in the administrative court against the expropriation procedure. If an immovable asset subject to joint ownership that was partly expropriated was divided among stakeholders and left to the possession and utilization of one or more stakeholders, and if the partial expropriation performed involves the whole or a part of this land, any procedures related to the expropriation will then be conducted only in relation to this stakeholder(s) and the expropriation fee is paid to them in proportion with their stakes. The stakeholder(s) has/have the right to file a lawsuit only for this part. They have no remaining rights on the part of the immovable that was not expropriated, and their names are removed from the list of stakeholders. The expropriated areas are registered in the land registry in the name of the administration. Any conflicts arising out of the enforcement of this article are resolved by the judicial courts.
Article 14 – Right to a Lawsuit	A lawsuit for cancellation of land acquisition decision in the administrative court or for correction of the material errors may be filed against the expropriation procedure within thirty days as of the date of notification issued by the court as per the Article 10 -the date of notification is replaced by the date of announcement in the newspaper by the court for those who could not be notified- by the owner of the immovable asset subjected to expropriation.
Article 18 – Dispute on the Ownership	The administration identifies whether there are any disputes on the immovable to be expropriated by performing an inquiry at the title deed administration, land survey directorate and civil courts in the location of the immovable. Shall the inquiries indicate that there is a dispute on its ownership or that it was subject to a lawsuit, the entirety of documents prepared as per the Article 10 are submitted to the civil court of first instance of the location of the immovable and is requested that the expropriation fee of the immovable is determined as well as its registration is made in the name of the administration in return for the payment to be made to the right holder as soon as they have been determined. The initial and consequent instalments of the expropriation fee identified by the court are deposited in the time deposit accounts with quarterly terms each at the bank designated by the court. The process to be followed in order to resolve the disputes on ownership will be in line with the procedures defined in the relevant legislation.
Article 19 – Registration of Immovable Assets not Registered in the Land Registry and Possessor ("*Zilyet*") Rights	The administration initially identifies whether the immovable not registered in the land registry is one of the public assets listed in Article 16 of the Cadastral Law (Law No. 3402). If the immovable is not one of the public assets listed in this article, and that the ownership for the immovable is present and a claim for acquisition is made on the basis of ownership, the administration conducts an investigation at the location of the immovable by means of the experts selected as per the Article 9, collects the evidence and specifies the state of affairs in a record. The entirety of the documents prepared by the administration and collected according to the Article 10 of the Expropriation Law is submitted to the civil court of first instance at the location of the immovable. The court identifies the expropriation fee for the immovable asset as per the procedure and duration specified in Article 10. If the court deems it sufficient to declare the immovable asset to be within the scope of the Turkish Civil Law on the expropriation date and to have been acquired through ownership, it conveys the expert report on the identification of the expropriation fee to the administration and this report along with the other documents given by the administration to the owner. The status of the immovable is communicated to the highest public official in charge of assets in that area while it is also announced at least once in a local newspaper issued in the location of the immovable and a newspaper circulated across Türkiye.

Article	Definition
	If no objections are raised by the Treasury or any third parties within thirty days as of the last announcement, a period of fifteen days is granted to the administration for the expropriation fee to be deposited in the bank stated in the announcement as down payment and in cash or as the first instalment in the name of the owner. Upon the submission of the payment receipt, the Court decides on the registration of the immovable asset in the name of the administration and the payment of the expropriation fee to the owner. Whereas, this decision is communicated to the land registry office and the bank where the money is deposited. If an objection is raised within this period by the Treasury or third parties, the court decides on the registration of the immovable asset in the name of the administration after the identified expropriation fee is deposited in a deposit account opened in the bank to be paid in the future to the person who would prove their rightful ownership.
Article 20 – Evacuation of the Immovable Asset	As per this Law, evacuation of the immovable asset, registered by the land registry office under the name of the authority to whom's benefit expropriation is conducted, is demanded from enforcement officer. The enforcement officer notifies the residents of the corresponding immovable asset about its evacuation within the following 15 days. If the immovable asset is not evacuated within the notified time, judicial evacuation takes place. Objection of grievance do not halt the evacuation and the court shall not issue an interim injunction. Neither the owner nor the administration shall be held responsible due to the evacuation of the immovable asset. Evacuation of cultivated lands shall be done at the end of the harvesting period. In cases when it is not possible to delay evacuation until the harvesting period, the owner of the crops shall be compensated prior to land entry. The authority responsible from the expropriation is permitted to request the evacuation of the parcel on condition that the price of the crops to be determined by the court shall be compensated. If the price of the crops has already been taken into consideration in the valuation done as per the Article 11 and 12 of the Law, there is not requirement for revaluation and repayment of the crop price.
Article 25 – Limitation of Rights and Transfer of Ownership to the Administration	The expropriation procedure is initiated through the notification conveyed by the Court as per the Article 10, with regard to exercising of rights and fulfilment of obligations. The transfer of ownership to the administration is realised based on the decision for registration taken by the Court. The owner of the immovable loses his/her rights to engage in activities such as construction or cultivation or to make fundamental changes in the current structure of the immovable after the date of the registration decision taken by the Court. The value of activities performed after this date is not taken into account. (Additional Clause: 12 July 2013- 6495/27th article) For large projects such as dams, irrigation networks and pipelines, highways, railways, harbours and airports, the decision for the public benefit is announced in the mukhtar's office of the neighbourhood and/or village where the immovable to be expropriated are located. After the last day of the announcement of the public benefit decision, the cost of the fixed installations on the immovable and the trees planted are not taken into account in the identification of the expropriation fee. This limitation on the immovable assets is valid for 5 years after the last day of the announcement.
Article 27 – Accelerated Expropriation	The immovable property subject to expropriation may be seized through accelerated expropriation under three circumstances; (i) in situations for which President takes decision regarding the need for national defense in the scope of the implementation of the Law on National Defense Obligations (Law No: 3634); (ii) in situations of emergency determined by the Presidential decision, or (iii) in extraordinary situations as envisaged by special laws. In such cases/situations, upon the request of the relevant administration, a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the procedures other than valuation shall be completed afterwards. In this process, upon request of the related administration, compensation amount for the immovable property shall be appraised by the court within 7 days through the experts

Article	Definition
	assigned as per Article 10 and 15 of the Expropriation Law. Seizure shall only be made following the invitation to be done in accordance with Article 10 and the amount is deposited to the bank specified in the announcement. The related Directorate of Land Registry is notified about the seizure decision to be made by the Court. The provision related to the prohibition of the transfer or alienation of the immovable asset is annotated to the land register. The asset is evacuated as per Article 20 following the issuance seizure decision. Article 27 of the Law enables land entry earlier through an accelerated process when compared to the regular expropriation processes conducted under Article 10 of the Law. This said, Article 27 does not limit the rights and claims of the owners on valuation of land and fixed assets. The valuation process is done by the court or court nominated experts as per the Expropriation Law. In this process, land valuation performed by experts appointed by the court is only a determination and is not decisive. After this price is determined and deposited by the Administration into the account number as determined by the court, actions stipulated in Articles 8, 9 and 10 shall apply. It is necessary to receive a "public benefit" decision from the relevant institutions for accelerated expropriation. After this decision is received, approved and published in the Official Gazette, accelerated expropriation process starts. Differently from ordinary expropriation, accelerated expropriation is the method of seizing an immovable property in line with prescribed procedure and method on the condition that actions other than valuation are completed later on. Accelerated expropriation will be handled in the form of a lawsuit. Public institutions will apply to the court in order to get valuation done and receive an expropriation decision. The court only acts as a determination authority in this case. If the court determines the existence of public benefit and the value of the immovable property as determined by the Valuation Commission is blocked in the bank account of the owner thereof, the lawsuit is admitted. Admission of the lawsuit will not result in the replacement of the owner in the title deed. The admission of this lawsuit can only enable the administration to perform the action considered to have public benefit. However, actions will not be complete. Actions will be performed just as in normal expropriation process. The Administration will primarily try to purchase the property from its owner through negotiated settlement. If agreement is reached as a result of this procedure, the relevant price will be paid and expropriation procedure will be complete. However, if no agreement is reached, the administration will also file a lawsuit on "the Determination and Registration of Expropriation Price"
Article 29 – Payment of the Expenses	The per diem allowances of the court panel as per Article 10 and appraised costs by the Court for the experts arranged by the Court as per Article 15 and the fees of the settlement heads consulted during reconnaissance, and title deed fees, and other expenses as stipulated by this Law are paid by the administration responsible from the execution the expropriation.
Article 30 – Transfer of an Immovable Owned by an Administration to Another Administration	This article articulates that immovable, resources and easement rights owned by public legal persons and agencies may not be expropriated by another public legal person or agency. The administration that requires the immovable, resource or easement rights identifies the fee according to the Article 8 of Expropriation Law. It lodges a written application at the administration owning the asset by stating the amount it would pay on the basis of this fee. If the owner of the asset fails to abide by the transfer and respond within sixty days, the conflict is settled via an affirmed decision within two months after being inspected by the relevant administrative office of the Council of State upon application by the receiving administration. If the parties fail to reach an agreement on the price, the receiving administration lodges an application at the court according to the procedure written in the Article 10 within thirty days as of the notification date of the Council of State decision asking for the expropriation fee to be identified. In the adjuration process to be conducted in this case, the court does not enforce the provisions of the Law dated 9/6/1938 and number 3533. A period of fifteen days is granted to the receiving administration for the fee identified as the expropriation fee as per the procedure envisaged in the Article 10 to be deposited in the bank

Article	Definition
	specified by the administration in order to be given to the asset-owning administration and the receipt of the fee deposited to be submitted. This period may be extended as necessary for only once by the court. The court decides on the registration of the immovable asset in the name of the administration and the expropriation fee to be paid to the asset-owning administration upon the submission of the receipt indicating that the expropriation fee was deposited by the receiving administration in the bank in the name of the asset-owning administration and this decision is notified to the title deed department and the bank where the money was deposited. The provision on registration is definitive and the parties reserve their rights for appeal in relation to the fee. The immovable, resource and the easement rights thus taken over is deemed to have been received via expropriation and it cannot be used for transfer purposes or for any public purposes other than those allowed by the transferring administration. Otherwise, the transferring administration may receive the immovable back as per the Article 23. This matter is annotated in the field of declarations in the title deed log.

B.2 – Other Laws relevant to Land Use, Acquisition, and/or Registration

Law	Scope
Forest Law **(No. 6831, 1956)**	In accordance with the Forest Law, the Project must obtain permission from the Ministry of Forestry and Water Affairs to perform activities in forests or lands classified as forest and is required to indemnify damages to public forests resulting from the construction of the railway. The use of state-owned lands (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Agriculture and Forestry (former Ministry of Food, Agriculture and Livestock – MoFAL). Citizens can also rent treasury lands for agricultural, commercial, sports and social activities. The use of forestry land is regulated by the Forest Law No.6831 and the Pasture Law No. 4342. Registration of the ownership or easement rights will be carried out in accordance with the Cadastral Law No. 3402, and Land Registry Code (Official Gazette No. 28738). According to Law (17.06.2004 article 5192/1), the Ministry has the authority to give permission for the use of forestland. This permission cannot be longer than 49 years. The amendment made in the Forest Law in 2004 (Official Gazette dated 3 July 2004, number 25511) states that "in case of public benefit or exigency concerning the location or construction of defence, transportation, energy, communication, water supply, wastewater, petroleum, natural gas, infrastructure facilities and solid waste disposal sites; sanatoriums, dams, ponds and cemeteries; governmental health, education and sports facilities and related places in governmental forest areas, real and legal persons can be licensed by the Ministry of Forestry and Water Affairs in return for a determined value. In addition to the Law itself, the regulation on "Permits to be Given on Land Considered Forest Areas" (Official Gazette dated 22.03.2007 numbered 26470) settles the methods and principles of the approvals, permits and easement rights to be given according to the 16, 17, 18 and 115th articles of the Forest Law as well as defining their costs for works and transactions that will be realized. Section 10 of this regulation defines the terms on which other state authorities are provided with permission to establish roads, buildings and other facilities. Article 42 depicts that in cases of public benefit, permission to utilize forest lands can be given to other state authorities for the establishment of facilities used in fields such as petroleum, natural gas, solid waste, infrastructure etc. Another regulation recently published in the Official Gazette numbered 28976 and dated April 18, 2014 stipulates the implementation of Article 17/3 and 18 of the Forest Law. Article 9 of this regulation redefines the fees and the calculation of the fees to be collected from other authorities utilizing forest land.
Pasture Law **(No. 4342)**	According to this Law based on the views of the Pastureland Commission (comprising of the manager of the district management of Ministry of Food, Agriculture and Livestock, an agricultural engineer from the Ministry itself, a jurist, a representative of the National Property Directorate, a technician from the Title Deed Registry and Cadaster Directorate and a representative of the Chamber of Agriculture) the Governors in Project affected provinces have the authority to give permission for altering the classification of pasturelands. Neither the right of the public nor of the specific users of pastures is recognized under the local legislative framework. Compensation will be paid for pasture lands to the relevant public agencies.
Cadastral Law **(No. 3402)**	The Cadastral Law determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps in order to register land and to constitute the basis of the spatial information system as the Civil Law (Law No. 4721) stipulates. In accordance with the Project, section 4 (principles for the determination of ownership rights), 6 (financial provisions) and 9 (transitions and final provisions) of the Law will need to be referenced.

Law	Scope
Land Registry Law **(No. 2644, 1934)**	In Türkiye, cadastral works are conducted primarily based on the Land Registration Law. The Law regulates the procedures and principles on the title deed transactions for real estate. This law specifies the authority that governs the registration of immovable properties.
Law on Soil Conservation and Land Use (Law No. 5403, 2005)	This Law sets forth the rules and principles for determining land and soil resources and their classification, preparing land utilization plans, preventing non-purpose utilisation, and defining the tasks and obligations to ensure land and soil preservation. Soil Preservation Boards are established in each province to examine, assess and monitor the activities related to the preservation, development and productive utilization of lands. The Law specifies the requirements and procedures regarding the use of agricultural lands for non-agricultural purposes.
Agricultural Reform Law on Land Arrangement in Irrigated Areas (Law No. 3083)	The Agricultural Reform Law regulates several issues for lands that are irrigated and that have been determined by the Council of Ministers. The Law covers matters regarding land consolidation and allocation of land for other purposes rather than agriculture in case of need. It is stipulated in the Law that in areas where agricultural production has no longer economic viability due to fragmentation, land consolidation works will be realized to prevent fragmentation that will result in having an effect both on the livelihood and the work force of any family. The articles referencing land consolidation issues and that will be considered by the Project are Articles 6 and 13. In addition to the Law, the regulation on “Implementation of the Agricultural Reform Law for Land Arrangement in Irrigated Areas” deals with the provisions pertaining to the implementation of the Law 3083. Articles 5 states that ownership of land belonging to real persons or public corporate entities cannot be transferred, conveyed, mortgaged and sold within 5 years after the decision of Council of Ministers has been announced in the Official Gazette. All restraints will be annotated to the land registry soon as this decision is officially announced.
The Notification Law (Law No. 7201)	The Notification Law No. 7201, with its amendments in 2003, 2008 and 2011, provides the basis for a process of notification for property owners. It consists of specific procedures to be followed to reach a range of public and private owners, including those whose addresses are unknown. According to the Law, provisions for notification include mail to known addresses; seeking support from local authorities; publication through an advertisement placed in a national newspaper published throughout the country in significant numbers; and electronic communications. The Law provides guidance for communicating with different categories of stakeholders, including resident owners, absentee owners, owners outside Türkiye, and various public agencies. The specificity and broadness of the Law support international policies’ emphasis on communications and consultation. The Notification Law details the process of notification for landowners and land users whose address is unknown as determined by the Notification Officer. According to the modifications made in the Law in 2011 (Article 10), the notification can be made wherever appropriate for the affected owner and/or to the last address known. If the person cannot be reached, notification is sent to the last known residence and is directed to the village or municipal quarter headmen.
Land Registry Code (Official Gazette No. 28738, 2013)	This code aims to keep the land registry records in order with respect to the Civil Law (Law No. 4721). It comprises of the principles and procedures pertaining to ownership, limited real and individual rights of immovable assets, and their entry, amendment, cancellation and rectification to the land registry.

B.3 – Procedure for Valuation of Lands, Constructible Plots and Structures under KGM's Technical Specifications

i) Land Valuation

Article 9 of the Technical Specifications provides detailed information on the calculation of gross production value, production costs, average annual net income, average purchase-sale values, and capitalisation rates of lands. These calculations are based on the analysis of primary and secondary data collected for each project area on a parcel basis, taking into account land classifications and topographic features. The specification emphasizes the necessity of researching locally realised land sale values as part of this analysis.

Article 10 states that the research to be carried out along the project corridor must involve data collection, analysis, and valuation methodologies in line with the valuation methodology. While surveys and face-to-face interviews are commonly used in data collection, the use of records from relevant institutions to support the process is also encouraged.

The "Agricultural Economic Research Survey Form," which has been used in previous similar studies, is adapted according to geographical regions and employed by the project coordinator and research team assigned. Using this form, data on the economic and technical characteristics of agricultural land, production costs, revenues, and local land market conditions are collected.

For each land type within the project area, data is collected through surveys from a sufficient number of parcel owners and/or operators (or users). When determining the number of parcels to be surveyed during the field studies, the topography of the land (e.g., flat, gently undulating, mountainous) and land types (e.g., dry and irrigated agricultural land, orchards, vineyards, olive groves, pasture land, wooded land) are taken as a basis. Additionally, the representativeness of the surveyed parcels for the expropriation area is verified by considering their distribution on topographic maps and expropriation plans provided by KGM to the research team.

The technical specifications list the key considerations for the data collection process, including face-to-face interviews with parcel owners and/or users, as well as with individuals and entities engaged in land transactions, as follows:

a) An inventory of land assets at the parcel level is prepared for the provinces, districts, and neigbourhoods within the expropriation area. Land use and the types of crops cultivated on the land are described in detail, along with their cultivation characteristics.

b) Physical and financial data related to agricultural production activities over recent years are collected. The cropping pattern for a typical crop rotation cycle is also identified, including physical data for each crop.

c) For annual and perennial crop production on the parcels subject to expropriation, data are gathered on input usage levels, marketing methods, sales conditions, sources of production inputs, and the physical quantities of inputs used.

d) For the commonly cultivated crops in the expropriation area and surrounding parcels, production costs, crop yields, prevalent crop rotation systems, farmgate prices received by landowners and/or users, and gross production values are calculated.

e) For agricultural lands within the project area, rent values, sharecropping arrangements, net income, and historical sales prices are established according to land classification.

f) The opinions, tendencies, and expectations of interviewed landowners and/or users regarding the expropriation of their lands and their views on compensation values are investigated. The data collected on these matters are analysed.

g) The actual market values of lands that have been bought and sold in each project area are identified through records from Provincial/District Land Registry Directorates, local real estate agencies, Chambers of Agriculture, Chambers of Industry and Commerce, and Commodity Exchanges, as well as through interviews with farmers and technical experts familiar with the region.

h) In local-level studies, only sale values resulting from freely negotiated transactions between parties are considered. Sale prices that result from court decisions, inheritance transfers, family-related transactions, foreclosure sales, or conversions of farmland to non-agricultural uses are excluded from the valuation.

i) In settlements along the project route where land is cultivated through possessory use ("*zilyetlik*"), it may not be possible to obtain transaction data from official records. In such cases, negotiated land sales between parties are considered. Additionally, informal transactions not recorded in the land registry, including those evidenced by settlement deeds, may be used in the valuation if deemed appropriate.

j) For data validation and calibration, results of local field trials conducted by the Ministry of Agriculture and Forestry, Agricultural Research Institutes, and Universities may be used, as available. After calibration, all primary data collected in each project area are reviewed and prepared for analysis.

k) To determine the current condition of each immovable property, photographs are taken during field inspections to document its general appearance at the time of assessment.

l) During the site inspection, it is determined whether agricultural production is actively taking place on the land. If so, the types of crops being cultivated are identified for valuation purposes.

m) Data related to the valuation of land expropriation, temporary land use, easement rights, trees, crops, and assets must be reported on a parcel-by-parcel basis, covering each province, district, neighbourhood, and parcel included in the project area.

Calculation of Net Income and Sale Values of Land

At the time and under the conditions in which the study is conducted for each project area, the data collected are analysed and evaluated to determine the gross production values and unit costs of individual agricultural products, assuming the agricultural lands are used as-is. This assessment is based on the topographic characteristics of the land and the commonly applied agricultural practices in the area.

When calculating the gross production value, care is taken to use average crop yields (including both main and by-products) covering multiple years whenever possible. For the calculation of production costs, all fixed and variable expenses associated with production – excluding land rent – must be taken into account.

It is essential that the physical and financial data used in this assessment come from a sufficient number of parcels, and that the analysis is conducted based on average data. In datasets consisting of cross-sectional data series, the presence of outliers is investigated, and if any are identified, their causes are analysed.

For each variable, simple averages can be calculated, while for the overall assessment of the project area, weighted averages can be derived using weights based on the proportion of different land types within the project area.

Calculation of the Capitalization Rate

In each project area, the applicable capitalization rate at the province, district, and neighbourhood levels is determined by the ratio of the average annual net income to the land's purchase-sale values. The income concept used in determining the land's value refers to the land's net income, net rent, or land rent.

The basic capitalization formula is used both to determine the value of immovable properties and to calculate the capitalization rate based on the market approach by applying the relationship between net income and market value (f = R / D). The capitalisation rate obtained using this formula is considered as an average, reflecting the general characteristics of a particular project corridor or the relevant province or district.

When adjusting this average capitalization rate for individual land parcels, experts will consider the specific characteristics of each parcel that may positively or negatively influence the capitalisation rate.

The estimation of the land's average annual net income or rent varies depending on whether the land is operated by the owner, a sharecropper, or a tenant. Additionally, rent is calculated separately for different land classifications or quality groups (e.g., dry farmland, irrigated farmland, orchards, pasture land, etc.).

After determining the capitalisation rates separately for different land types and topographic features, a weighted average method is applied – taking into account the share of each land type within the average operational holding – to compute the regional average capitalisation rate. In this way, an average capitalisation rate is established for use at the project area or at the province, district, or neighbourhood level.

Land, Crop, Tree, and Asset Valuation

Based on the analysis of parcel-level data collected for each project, the gross production values and production costs of cultivated crops are calculated according to land classifications and the topographic features of the land. The average annual net income of the land is determined as the difference between the average gross production value – calculated in line with crop rotation systems – and the production costs excluding land rent. The bare land value is then calculated by dividing the average annual net income by the capitalisation rate adjusted for the parcel's characteristics. If there are any supplementary components on the land, their values are added to this base amount.

The value of annual crops, as well as fruit-bearing and non-fruit-bearing trees on the land, is assessed using either the cost or income approach, depending on the developmental stage of the plants. The specifications state that "particularly for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree group by age must be calculated individually using the income approach, and the details of these calculations must be clearly presented in the valuation reports." However, the specification does not provide further methodological details.

To obtain more specific information on this matter, a request has been made to the valuation (engineering) firm for the valuation report they have prepared and the methodological documentation they have applied.

Research on the Local Land Market and Market Prices

The market values of lands that have been actually bought and sold within the project area are determined by cross-referencing data obtained from official records – such as those of the Provincial/District Land Registry Directorates, local real estate offices, Chambers of Agriculture, and Chambers of Industry and Commerce – with field investigations, including direct interviews with the parties involved in the transactions.

In addition, lands that have been sold locally through informal means (e.g., with village deeds or without any documentation) may also be taken into account, provided that the transaction is confirmed through a written statement and approval from the mukhtar. Efforts are made to ensure that, to the extent possible, only actual transactions that have occurred within the last five years are considered in the research.

Land valuation must not be based on any potential increase in production or early harvest that may result from enhancements or facilities installed on the property. (For example, for greenhouse areas, the valuation should be based on the land value determined for non-greenhouse areas.) Therefore, the cost of the greenhouse structure itself is separately calculated and added to the estimated value as a building cost.

ii) Valuation of Constructible Plots ("*Arsa*")

Article 11 of the Technical Specifications states that a clear distinction must first be made between "constructible plots" ("*arsa"*) and "land" ("*arazi*") in property valuation. Although Article 11 of Law No. 2942 specifies separate valuation methods for constructible plots and agricultural land, it does not define which areas are considered as plot and which as land. To make this distinction, the provisions of the Real Estate Tax Law are used:

> "*According to Article 12 of the Real Estate Tax Law No. 1319: "Within municipal boundaries, land that has been parceled by the municipality is considered a constructible plot ("arsa"). For un-parceled land located within or outside municipal boundaries, the Council of Ministers determines which shall be considered constructible plots under this law. Unless otherwise stated, the term "land" ("arazi") used in other articles of this law also includes constructible plots.*"

The term "parceled" as mentioned in the Law refers to immovable properties for which an implementation zoning plan has been prepared by the municipality, followed by the preparation of a subdivision (parcellation) plan, and which have been officially registered ex officio ("*re'sen*") by the land registry directorate.

According to the Zoning Law No. 3194, a constructible plot is defined as the form of a cadastral parcel located within a zoning block that has been arranged in accordance with the principles of the Zoning Law, Zoning Plan, and related regulations.

The term “adjacent area under municipal jurisdiction” (“*mücavir alan”)* refers to zones that fall under the control and responsibility of municipalities in terms of zoning legislation. The Council of Ministers decision referred to in Article 12 of Law No. 1319 was issued in 1983 (Decision No. 83/6122). According to this decision, for a parcel to qualify as a constructible plot (*arsa*), it must be designated as a settlement area under an implementation zoning plan – regardless of whether it is located inside or outside municipal boundaries – it must be within a developed (settled) area and benefit from municipal services.

In order for a property to be considered a constructible plot on the valuation date, the following conditions must be met:

- It must be located within the municipal zoning plan, or, if not, within a municipal or adjacent area;
- It must benefit from municipal services;
- It must be located in a developed (settled) area.

These conditions must be documented in parcel-specific reports with supporting documents obtained from the relevant municipality.

Properties located outside the boundaries of municipalities and adjacent areas – including land associated with tourist facilities, fuel stations, cooperative housing developments, and other social or economic facilities – shall not be considered as constructible plots.

If a property is located within the boundaries of a neighbourhood but not within a municipality or adjacent area, it is to be classified as agricultural land. Services provided to the property and its surroundings may only be considered objective value-enhancing factors in accordance with Court of Cassation rulings. The value determined by the income method may be increased based on objective grounds, but such an increase shall not exceed 50%.

In the valuation process, the property is analysed and valued based on its current condition, regardless of its potential future status under an upcoming zoning plan. If a zoning plan amendment related to the parcel was made as a result of the project for which expropriation is being carried out, the valuation must be based on the parcel’s condition prior to the zoning amendment.

In such cases, for example, if a plot is shown as green space in the zoning plan due to a plan revision triggered by the project, the valuation should not be reduced on the grounds that construction is no longer permitted on the parcel. According to Article 16 of the Cadastre Law No. 3402, green areas located within the zoning plan must be registered in the land registry. However, a designation of “green space” or “park area” in the upper-scale plans before a detailed zoning and subdivision plan is approved does not eliminate the owner's property rights and should not be considered a factor that reduces value.

That said, if parcels are designated as “agricultural land” in the zoning plan, this is considered an indicator that construction is not permitted, and such parcels should be valued as agricultural land.

In the valuation of constructible plots, first, the property’s title deed records must be reviewed to identify all vacant land sales transactions conducted over the past five years in the vicinity of the subject property. Additionally, during the survey stage, it must be assessed whether the sales prices recorded in official documents reflect the actual market value, or whether they were underreported to avoid deed transfer fees.

To this end, transactions involving constructible plots sold through negotiated agreements between private parties are considered as comparable sales (market evidence) in the valuation process. However, transactions shown in the records that involve court-mandated sales, inheritance-related transfers, intra-family sales, or foreclosure sales must not be treated as valid comparables.

The valuation of constructible plots is based on comparable sales data in accordance with zoning rights and buildability conditions. Only arm’s-length transactions (“*emsal satışlar*”) without special circumstances

conducted prior to the valuation date are considered. Factors such as building typology (detached, attached, or block), floor area ratio (FAR / KAKS), maximum building height (hmax), lot coverage ratio (TAR / TAKS), and land use decisions, along with other characteristics that may positively or negatively affect the value of the parcel, are all considered in the comparative analysis.

If applicable, any restrictions recorded on the title deed (e.g., mortgages, foundation notations, easements including administrative ones) or planning constraints (e.g., disaster risk zones, urban transformation areas, natural or archaeological sites, green area designations) must be reflected in the valuation.

To ensure an accurate comparison, property tax declarations for both the subject property and comparable sales should be reviewed, with attention to geographic proximity. While the valuation result of a property expropriated under similar circumstances may offer insight, it should not be used as a direct comparable.

Finally, land purchase, sale, or expropriation values paid by public institutions in the same neighborhood or surrounding area should be reviewed and used as a reference to evaluate the consistency of the appraised values for constructible plots.

According to precedents established by the Court of Cassation, in cases where there are no available or suitable comparable sales of vacant plots, it is permissible to derive the plot value by deducting the building value from the sale price of improved (built-upon) plots.

When comparing the subject property to comparable sales, the following factors must be considered:

a) Parcel size (area and/or width),

b) Parcel location (e.g., frontage on a main road, street or avenue; corner parcel status),

c) Shape and physical/topographic condition of the land,

d) Parcel dimensions, including frontage (length along the road) and depth,

e) Land use designation in the zoning plan and the development characteristics of the surrounding area,

f) Zoning regulations and building conditions such as floor area ratio (FAR/KAKS), building coverage ratio (TAR/TAKS), setback distances (front, side, rear),

g) Width of the street, road, or avenue on which the property is located,

h) Restrictions that may limit the use of the property (e.g., green space designation, conservation decisions, building prohibitions),

i) Distance to the city center and social/cultural infrastructure areas,

j) Accessibility and transportation options,

k) Legal rights and encumbrances on the property (e.g., easements, annotations, declarations, mortgages),

l) The case where a property recorded as agricultural land in the land registry is in fact identified as an constructible plot, but has not undergone a zoning implementation process (i.e., no deduction has been made from its area for public purposes such as the land readjustment share – DOP).

All such factors that may positively or negatively affect the value of the property must be taken into account.

In line with the above, zoning status documents and zoning plans (e.g., zoning certificates, parcel layout plans) must be prepared for both the subject properties and the comparable properties. For parcels located within zoning plan areas, the approved zoning status documents (including maps and boundary definitions) must be obtained from the relevant municipalities or provincial administrations. The responsible authority must formally request these documents from the relevant municipal or provincial institutions.

iii) Structure Valuation

Article 12 of the Technical Specifications outlines the procedures and methods to be followed in the valuation of buildings as described below:

- In accordance with the **Communiqué on Approximate Unit Construction Costs** issued annually by the Ministry of Environment, Urbanisation and Climate Change, buildings are classified into five main groups based on construction costs and the architectural service class applicable to the structure. Each group is further divided into sub-groups (e.g., A, B, C) based on construction cost levels.

- Pursuant to **Article 29, paragraph (b)** of the **Real Estate Tax Law No. 1319**, a schedule is published annually by the Ministry of Treasury and Finance and the Ministry of Environment, Urbanisation and Climate Change that lists the standard square meter construction costs. This schedule classifies buildings by structural system, material and construction quality, and intended use.

- Although these approximate construction costs and the standard square meter costs used for property tax purposes were not originally designed for valuation purposes across diverse building types and qualities, court rulings have recommended their use in expropriation-related valuation studies to ensure consistency in application.

- In the first instance, the dimensions of the buildings located within the expropriation area must be measured using precision tools (e.g., steel measuring tape or surveying instruments), and the construction cost is calculated based on the relevant building class and unit prices as published in the aforementioned communiqué.

- One of the most important procedures that must be carried out in expropriation practices is the determination of the actual value of the immovable property. In order for investments to be completed on time, the valuation must be conducted based on scientific principles and objective criteria. The unit construction costs published by the Ministry of Environment, Urbanization and Climate Change are calculated under the assumption that the buildings possess the standard characteristics they are supposed to have under normal conditions. However, if the expropriated building has features that fall short of these standards, the costs corresponding to the deficiencies should be calculated and deducted from the total value of the structure. This situation is frequently encountered, especially with older buildings. For example, if a building subject to valuation lacks plaster as a construction component, the cost of the plaster must be calculated and subtracted from the total value of the building. Supreme Court rulings also emphasize that the internal and external features of the disputed structure (e.g., water, electricity, and sewer systems, wet and dry floor coverings, roof materials, etc.) must be examined in detail, and the structure's value should be determined after deducting the cost of any missing components[119] (Anonymous, 2015; Anonymous, 2016; Anonymous, 2018). Just as the cost of additional features such as a jacuzzi, sauna, built-in cupboards, wood paneling, parquet flooring, ceramic tiles, and central heating system, if present in an individual unit but not in others, is added to the total cost, similarly, the cost of missing elements is also deducted.

  Accordingly, from the calculated value, the cost of any **incomplete construction** work is deducted. Then, depreciation is applied using the rates specified in the **Depreciation Table Published in the Official Gazette** dated 2 December 1982 (No. 17886). If the building has salvageable value and the property owner requests it, the salvage value may also be deducted after subtracting the cost of incomplete construction and depreciation.

- Additionally, structures that are not considered part of the main building's approximate construction cost – such as garden walls, wells, canopies, or concrete yards – must be separately valued if they fall within the expropriation boundary, and their costs should be added to the total valuation.

[119] Anonymous, 2015. Supreme Court Decision. 5th Civil Chamber, No: 2014/23596, Decision: 2015/5990, Date: 25.03.2015. Anonymous, 2016. Supreme Court Decision. 5th Civil Chamber, No: 2016/12246, Decision: 2016/17970, Date: 22.12.2016. Anonymous, 2018. Supreme Court Decision. 5th Civil Chamber, No: 2018/6157, Decision: 2018/19026, Date: 25.10.2018.

- It must also be determined whether the building subject to expropriation is registered under condominium ownership ("*kat mülkiyeti*") or construction servitude ("*kat irtifakı*").

A property may be expropriated in its entirety, or individual independent sections (condominium units), which are defined as separate immovable properties under Law No. 634 on Condominium Ownership, may be subject to expropriation on their own.

According to Article 46 of Law No. 634, "*If the main property is expropriated, the expropriation value of each independent section shall be determined separately, taking into account its associated land share and appurtenances, and paid to the owner of that section.*"

Given that elements such as the building type, construction quality, interior layout and decoration of independent units, façade, and the extent of access to common areas may vary across units, the valuation must be based on detailed inventory data specific to each unit (Court of Cassation 5th Civil Chamber, E:1990/11239, D:1990/31119, Date: 13.11.1990)/

In valuation practice, the total value of the main property – including the land and common areas – is determined first. In a second step, this value is then distributed among the independent units, or each unit may be valued individually. If a particular independent section includes features that differ from other units – such as additional elements – these should be taken into account in the valuation (Court of Cassation 18th Civil Chamber, E:2005/2842, D:2005/5438, Date: 24.05.2005).

For example, if an independent section includes features such as a jacuzzi, sauna, built-in cabinets, wood paneling, parquet flooring, ceramic tiles, or central heating that are not present in other sections, the net cost of these features must be added to the construction cost. However, if such features are found in all sections, they are considered when selecting the building class and determining the unit cost, and should not be added again to avoid double-counting.

The results of the valuation, along with photographs taken from various angles, will be transferred to the expropriation information system in the format specified.

iv) Other Considerations

1. **According to Article 5 of Law No. 4706**, when valuing any structures or facilities built on Treasury-owned immovable properties after 31 December 2000, the provisions set out in the **Regulation on the Administration of Treasury Immovable Properties** and the **Ministry of Finance Circular No. 2015/1** must be taken into account. Information and reports on these matters must be submitted to the relevant authority.

2. **Article 19 of the Expropriation Law** states: *"In the expropriation of properties registered under another person's name, ownerless, or not acquired by the possessor, the minimum equipment cost of buildings and the value of trees, as determined under Article 11, shall be paid to the possessor."* For such lands, the equipment cost of buildings (minimum furnishings) is calculated. (In such cases, a **possessory record** must be prepared and signed by the mukhtar, village council members, and the possessor.)

3. **Structures such as flowerbeds, curbstones, or other landscaping elements** established by facility owners within the old expropriation corridor for petrol stations or other roadside facilities will not be included in the valuation, pursuant to **Articles 13 and 17 of the Highway Traffic Law No. 2918**.

4. For buildings located within the expropriation corridor, zoning, cadastre, land registry, and building permit documents must be collected. Relevant tables and inventories will be prepared, and the results of all correspondence conducted by the administration with Cadastre, Land Registry, Municipality, or Governorate (Special Provincial Administration) for the purpose of acquiring this information (e.g., requests for building permit data, court-ordered demolition decisions for unlicensed structures) must be followed up and documented.

5. All structures and their appurtenances – regardless of type or class – that must be considered during the valuation studies (e.g., industrial facilities, agricultural buildings, mining operations and related

areas, aboveground and underground installations such as perimeter walls, wire fences, sewer lines, drainage systems, concrete paving, boreholes, and wells), including landscaping and infrastructure elements, must be measured and mapped. Their locations must be marked on the **current expropriation plan**, along with the calculation and placement of intersection points between the old and new expropriation boundaries and parcel borders.

6. **Integral parts ("*mütemmim cüz*")** located on the expropriated parcels must be shown on a **scaled parcel sketch**.

7. For **wire fences** (with concrete or metal posts), **driven wells**, **caisson wells**, and **boreholes**, unit prices will be determined through analysis and included in the valuation.

Finally, it should be noted that the provisions summarized so far from the technical specifications represent general principles and do not provide detailed formulas or methodological approaches for valuation. However, it cannot be claimed that these provisions are inconsistent with standard valuation methodologies. This is because, in Türkiye, many aspects of valuation that are not explicitly addressed in the Expropriation Law have been shaped and clarified through **precedents set by the Court of Cassation**.

Appendix C – List of Orphan Parcels on Treasury Land

District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m^2)	Expropriated Area (m^2)	Remaining Area (m^2)
Serik	1	Sarıabalı	258	16	Agricultural	5,444.34	5,111.25	333.09
	2	Sarıabalı	258	14	Agricultural	2,491.46	2,133.14	358.32
	3	Sarıabalı	164	8	Agricultural	2,137.46	1,666.34	471.12
	4	Sarıabalı	283	34	Agricultural	1,029.4	595.96	433.44
	5	Sarıabalı	283	35	Agricultural	869.92	460.54	409.38
	6	Sarıabalı	283	29	Agricultural	822.14	660.40	161.74
Manavgat	7	Çakış	128	165	Agricultural	288.46	59.56	228.90
	8	Taşağıl	348	255	Agricultural	507.99	85.69	422.30
	9	Taşağıl	551	9	Agricultural	1,249.69	868.25	381.44
	10	Taşağıl	910	1	Land with structure	1,148.53	755.00	393.53
	11	Hocalar	185	67	Agricultural	1,890.95	1,776.27	114.68
	12	Çolaklı	883	3	Agricultural	690.78	311.42	379.36
	13	Çolaklı	887	1	Forest	1,147.23	680.28	466.95
	14	Çolaklı	890	12	Agricultural	716.58	472.33	244.25
	15	Çolaklı	955	1	Agricultural	311.07	91.13	219.94
	16	Kalemler	126	36	Agricultural	518.7	51.30	467.40
	17	Kalemler	155	5	Agricultural	1,154.62	1,143.74	10.88
	18	Kalemler	156	16	Agricultural	2,522.85	2,275.21	247.64
	19	Kalemler	156	18	Agricultural	1,388.05	1,200.19	187.86
	20	Kalemler	156	19	Agricultural	1,553.69	1,129.53	424.16
	21	Kalemler	191	25	Raw Soil	2,323.06	1,852.36	470.70
	22	Evren	758	70	Agricultural	352.9	83.03	269.87
	23	Evren	779	1	Raw Soil	1,671.25	1,414.87	256.38
	24	Evren	765	1	Channel	393.28	62.43	330.85
	25	Evrenleryavşi	145	33	Agricultural	478.55	236.98	241.57
	26	Bucakşeyhler	210	25	Agricultural	664.4	428.75	235.65
	27	Bucakşeyhler	126	4	Constructible plot	994.42	583.31	411.11
	28	Aşağıışıklar	122	125	Raw Soil	908.6	642.55	266.05
	29	Aşağıışıklar	203	1	Forest	3,212.81	2,790.88	421.93
	30	Aşağıışıklar	121	61	Agricultural	562.69	234.99	327.70
	31	Aşağıışıklar	127	6	Agricultural	541.23	90.06	451.17
	32	Aşağıışıklar		YOL_1		217.02		217.02
	33	Aşağıışıklar		YOL_3		140.82		140.82
	34	Aksaz	169	1	Forest	2,029.41	2,025.09	4.32
	35	Hacıali	233	1	Forest	2,531.56	2,085.40	446.16
	36	Cevizler	117	7	Agricultural	421.67		421.67
	37	Cevizler	117	8	Agricultural	32.03		32.03
	38	Hacıisali	197	50	Raw Soil	562.79	194.53	368.26
	39	Hacıobası	103	205	Agricultural	1,427.12	1,248.83	178.29
	40	Hacıobası	170	1	Forest	4,453.34	4,171.50	281.84
	41	Hacıobası	132	71	Agricultural	570.47	164.85	405.62
	42	Uzunlar	185	6	Raw Soil	1,925.31	1,521.82	403.49
	43	Uzunlar	183	21	Agricultural	668.01	396.17	271.84
	44	Uzunlar	181	8	Agricultural	596.33	309.58	286.75
	45	Uzunlar	200	65	Agricultural	1,255.04	907.78	347.26
	46	Kadılar	116	3	Pylon	121	8.69	112.31
Alanya	47	Alara	190	6	Agricultural	611.63	157.98	453.65
	48	Alara	124	316	Agricultural	579.82	410.97	168.85
	49	Alara	124	315	Agricultural	140.03	72.94	67.09
	50	Alara	122	311	Agricultural	1,211.66	770.87	440.79
	51	Alara	122	308	Agricultural	1,357.78	1,064.17	293.61
	52	Alara	165	6	Agricultural	1,665.2	1,366.90	298.30
	53	Alara	131	7	Agricultural	273.77	39.32	234.45
	54	Alara	133	33	Agricultural	696.37	370.60	325.77
	55	Alara	133	30	Agricultural	1,019.75	532.16	487.59
	56	Alara	156	85	Agricultural	1,677.64	1,324.11	353.53
	57	Alara	156	89	Agricultural	517.45	215.97	301.48
	58	Alara	156	93	Agricultural	1,562.99	1,227.63	335.36
	59	Alara	156	94	Agricultural	1,445.4	977.84	467.56
	60	Alara	156	95	Agricultural	2,625.94	2,141.70	484.24
	61	Alara	156	101	Agricultural	599.55	318.71	280.84
	62	Alara	160	2	Agricultural	731.29	345.43	385.86
	63	Alara	156	103	Agricultural	701.44	431.87	269.57

	64	Alara	156	105	Agricultural	1042.5	773.64	268.86
	65	Alara	156	106	Agricultural	231.66	5.72	225.94
	66	Alara	113	353	Agricultural	1134.8	642.55	492.25
	67	Alara	113	340	Agricultural	664.26	433.23	231.03
	68	Alara	113	341	Agricultural	560.34	230.53	329.81
	69	Alara	113	342	Agricultural	349.45	121.13	228.32
	70	Alara	113	343	Agricultural	321.79	208.95	112.84
	71	Alara	115	11	Agricultural	459.08	136.42	322.66
	72	Alara	124	260	Agricultural	341.1	102.67	238.43
	73	Alara	124	261	Agricultural	485.6	266.14	219.46
	74	Alara	124	280	Raw Soil	212.23	80.32	131.91
	75	Alara	116	34	Agricultural	2,137.03	1,640.10	496.93
	76	Alara	116	35	Agricultural	553.59	327.83	225.76
	77	Akdam	106	54	Agricultural	386.88	11.33	375.55
	78	Akdam	125	10	Agricultural	392.03	75.17	316.86
	79	Akdam	116	22	Agricultural	414.63	5.62	409.01
	80	Türkler	239	21	Forest	867.11	864.06	3.05
	81	Türkler	239	13	Forest	532.44	529.09	3.35
	82	Türkler	239	11	Forest	563.39	560.48	2.91
	83	Türkler	239	18	Agricultural	370.88	367.83	3.05
	84	Toslak	253	1	Forest	7,374.02	7,055.00	319.02
	85	Toslak	299	35	Agricultural	1,465.59	1,190.21	275.38
	86	Toslak	326	66	Land with structure	2,567.62	2,307.37	260.25
	87	Elikesik	173	46	Agricultural	430.68	119.74	310.94
	88	Telatiye	438	5	Forest	2160	2,146.15	13.85
	89	Emişbeleni	203	25	Agricultural	605.44	154.37	451.07

Appendix D – Land Entry and Exit Protocols (Template)

ANTALYA – ALANYA MOTORWAY PROJECT
LAND ENTRY PROTOCOL

Information on Land	
Province:	
District:	
Neighbourhood:	
Parcel No:	
Location/Motorway KM:	
Brief description of the activities to be conducted on the parcel:	
List of structures/trees/crops on the parcel prior to land entry by the Project (if any)	
Planned date for land entry by the Project	

In relation to the parcel identified above, the landowner and/or user signing this document hereby declares that they have granted permission for Project parties to access the land within the scope of the **Antalya – Alanya Motorway** Project, and that the necessary field identification activities have been carried out by the authorized personnel. The signatory further confirms that all payments required under the Expropriation Law for any identified structures, trees, and crops (if any) have been made to the rightful owners.

Additionally, the landowner and/or user declares that they have been informed by the Project about both the activities to be carried out under the Project and the additional support to be provided within the scope of the Project's Resettlement Action Plan (RAP). These support measures shall be provided to the eligible beneficiaries defined under the RAP following the approval of the RAP document by the relevant financing institutions.

No Project personnel (including contractors and subcontractors) shall enter the parcel unless all necessary permits and approvals under applicable local legislation regarding land access have been duly obtained.

	Name Surname	**Date**	**Signature**
Landowner/Shareholder:			
Land User:			
Witness – Settlement Head (Mukhtar):			
SPV Representative:			
EPC Representative:			

Annexes:

Annex 1: Documents related to the payments made to the rightful owner under the Expropriation Law and, where applicable, the RAP (e.g., crop compensation payments, etc.)

Annex 2: Photographs and documentation showing the pre-access condition of the parcel to be entered (including ground, and any structures, trees, or crops, if present)

ANTALYA – ALANYA MOTORWAY PROJECT

LAND EXIT PROTOCOL

Information on Land	
Province:	
District:	
Neighbourhood:	
Parcel No:	
Location/Motorway KM:	
Brief description of the activities conducted on the parcel:	
Date for land exit by the Project	

This protocol confirms that all activities carried out on the parcel specified above within the scope of the Antalya–Alanya Motorway Project have been completed and that the land has been restored to its original condition as agreed with the landowner and/or user.

The landowner and/or user signing this document acknowledges that the parcel has been duly reinstated and declares that they shall not make any further claims or compensation demands against the Project Owner, the Assigned Company, the contractor, the subcontractors, or any third party regarding the use of the land during the construction works.

This protocol does not create any rights or obligations for the Project Owner, the Assigned Company, the contractor, the subcontractors, or any third parties beyond those established under separate contractual agreements.

	Name Surname	**Date**	**Signature**
Landowner/Shareholder:			
Land User:			
Witness – Settlement Head (Mukhtar):			
SPV Representative:			
EPC Representative:			

Annexes:

- **Annex-1:** List of reinstated areas and/or structures
- **Annex-2:** Photographs and related documentation of the site, including the reinstated areas and structures

Appendix E – Consent Protocol (Template)

ANTALYA – ALANYA MOTORWAY PROJECT
CONSENT PROTOCOL

Motorway construction works will begin between KM: ……. and ……. of the ……. Project.

Since the payment of compensation for the expropriated portion of our land, which has been or will be expropriated by the KGM, will be made after the completion of the expropriation procedures, and due to the urgency of the work, we give our consent for the immediate entry of the remaining part of our land located at ……. District, …….. Neighbourhood, ……. Province, ……. Parcel No. ……., Land Registry Type: ……, which falls within the boundaries of the Project (or which remains inside the expropriation area).

We declare that, for the section of the Motorway located between KM: ……. and ……., which intersects with the above-described property, we give our consent for the entry into our land by the KGM for the commencement of construction works, and we waive all claims and rights to compensation regarding the current condition of the land and all its existing elements, provided that ownership and compensation rights will be maintained.

	Name Surname	**Date**	**Signature**
Landowners/Shareholders:			
Settlement Head (Mukhtar):			
KGM Regional Directorate Representative:			
SPV Representative:			
EPC Representative:			

Structures, trees, and crops located on the property are listed below:

1.
2.
3.
4.
5.

Explanations:

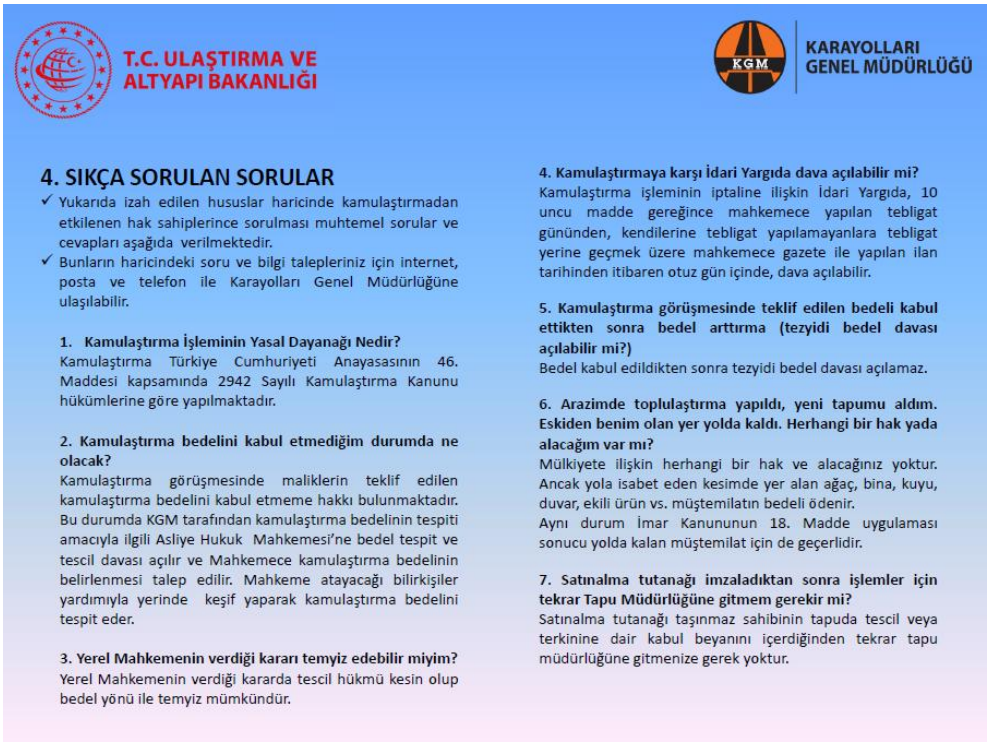
- Specify the crops on the land (Wheat, Beans, Corn, etc.)
- Specify existing trees and type (Species, Age, Quantity)
- Specify structures (construction material, size, etc.)

Annexes:

Annex 1: Photographs and documentation showing the pre-access condition of the parcel to be entered (including ground, and any structures, trees, or crops, if present)

Appendix F – KGM's Booklet on Procedural Steps in Expropriation Processes[120] (Cover Page and Sample Page for Frequently Asked Questions)

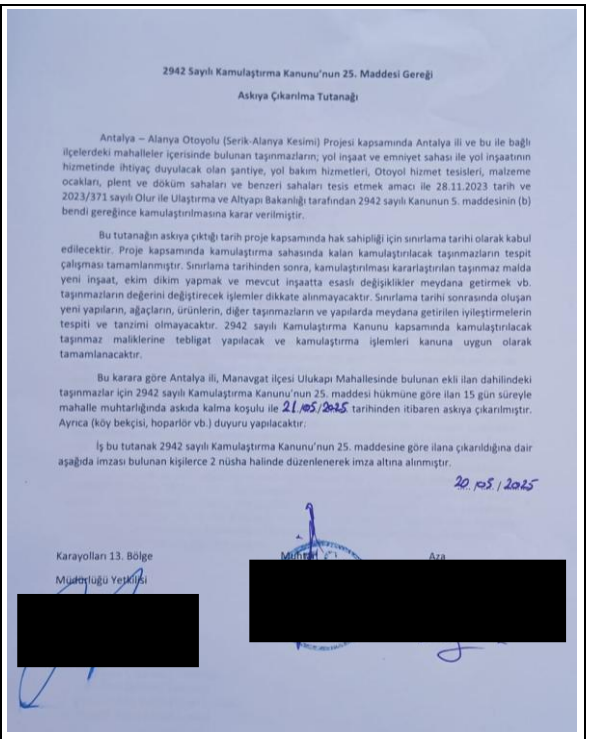




120 https://www.kgm.gov.tr/SiteCollectionDocuments/KGMdocuments/MerkezBirimler/TasinmazlarDairesi%20Baskanligi/Calismalar/kamulastirmaislemadimlari.pdf

Appendix G – Example Cut-off Date Notices posted in Affected Settlements





2942 Sayılı Kamulaştırma Kanunu'nun 25. Maddesi Gereği

Askıya Çıkarılma Tutanağı

Antalya – Alanya Otoyolu (Serik-Alanya Kesimi) Projesi kapsamında Antalya ili ve bu ile bağlı ilçelerdeki mahalleler içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tesis etmek amacı ile 28.11.2023 tarih ve 2023/371 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, ekim dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre Antalya ili, Manavgat ilçesi Ulukapı Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu'nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 21/05/2025 tarihinden itibaren askıya çıkarılmıştır. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

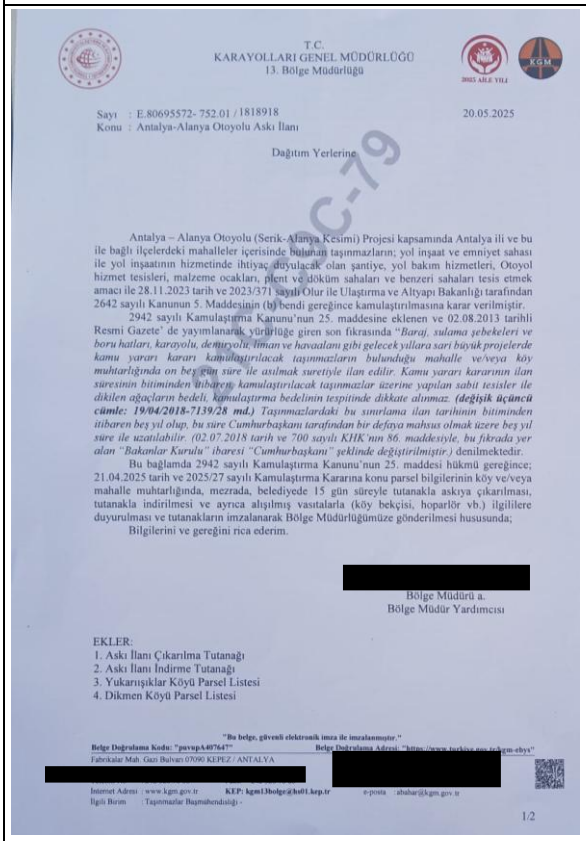
İş bu tutanak 2942 sayılı Kamulaştırma Kanunu'nun 25. maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

20.05.2025

Karayolları 13. Bölge Müdürlüğü Yetkilisi [redacted]

Muhtar [redacted]

Aza [redacted]



T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
13. Bölge Müdürlüğü

Sayı : E.80695572- 752.01 / 1818918 — 20.05.2025
Konu : Antalya-Alanya Otoyolu Askı İlanı

Dağıtım Yerlerine

Antalya – Alanya Otoyolu (Serik-Alanya Kesimi) Projesi kapsamında Antalya ili ve bu ile bağlı ilçelerdeki mahalleler içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tesis etmek amacı ile 28.11.2023 tarih ve 2023/371 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2642 sayılı Kanunun 5. Maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu'nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayımlanarak yürürlüğe giren son fıkrasında "*Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havalanı gibi gelecek yıllara sarı büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve/veya köy muhtarlığında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz. **(değişik üçüncü cümle: 19/04/2018-7139/28 md.)** Taşınmazlardaki bu sınırlama ilan tarihinin bitiminden itibaren beş yıl olup, bu süre Cumhurbaşkanı tarafından bir defaya mahsus olmak üzere beş yıl süre ile uzatılabilir. (02.07.2018 tarih ve 700 sayılı KHK'nın 86. maddesiyle, bu fıkrada yer alan "Bakanlar Kurulu" ibaresi "Cumhurbaşkanı" şeklinde değiştirilmiştir.)* denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu'nun 25. maddesi hükmü gereğince; 21.04.2025 tarih ve 2025/27 sayılı Kamulaştırma Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, mezrada, belediyede 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalanarak Bölge Müdürlüğümüze gönderilmesi hususunda;

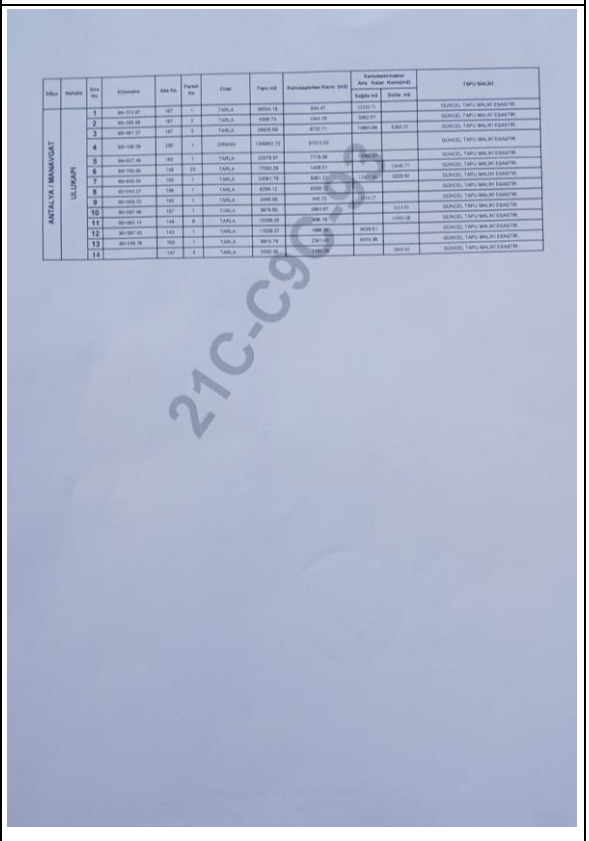
Bilgilerini ve gereğini rica ederim.

[redacted]
Bölge Müdürü a.
Bölge Müdür Yardımcısı

EKLER:
1. Askı İlanı Çıkarılma Tutanağı
2. Askı İlanı İndirme Tutanağı
3. Yukarışıklar Köyü Parsel Listesi
4. Dikmen Köyü Parsel Listesi

"Bu belge, güvenli elektronik imza ile imzalanmıştır."
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İnternet Adresi : www.kgm.gov.tr KEP: kgm13bolge@hs01.kep.tr e-posta : ahabar@kgm.gov.tr
İlgili Birim : Taşınmazlar Başmühendisliği -

1/2



Sıra No	Mahalle	Kütük No	Ada No	Parsel No	Cinsi	Tapu m2	Kamulaştırılan Alanın (m2)	Kamulaştırmadan Artan Alan Hakkında		TAPU MALİKİ
								Sağda m2	Solda m2	
1	ULUKAPI	89-374-87	167	1	TARLA	28554.18	844.47	21330.71		DÜNCEL TAPU MALIKI ESASTIR.
2		89-386-88	167	3	TARLA	4308.73	1064.18	3261.97		DÜNCEL TAPU MALIKI ESASTIR.
3		89-481-37	167	5	TARLA	28830.69	4722.71	14861.98	9383.91	DÜNCEL TAPU MALIKI ESASTIR.
4		89-156-16	200	1	ORMAN	1360001.73	81013.93			DÜNCEL TAPU MALIKI ESASTIR.
5		89-557-48	163	1	TARLA	33079.97	7718.38	19682.81		DÜNCEL TAPU MALIKI ESASTIR.
6		89-193-90	148	23	TARLA	17695.28	1408.51		13648.77	DÜNCEL TAPU MALIKI ESASTIR.
7		89-835-50	109	1	TARLA	24081.79	8381.11	11415.90	3229.92	DÜNCEL TAPU MALIKI ESASTIR.
8		90-043-37	198	1	TARLA	8299.12	8299.12			DÜNCEL TAPU MALIKI ESASTIR.
9		90-018-70	142	1	TARLA	3498.98	699.73	2814.27		DÜNCEL TAPU MALIKI ESASTIR.
10		90-087-40	157	1	TARLA	3679.60	2961.67		1013.93	DÜNCEL TAPU MALIKI ESASTIR.
11		89-383-14	146	8	TARLA	15098.28	2936.18		11691.08	DÜNCEL TAPU MALIKI ESASTIR.
12		90-087-40	143	1	TARLA	11028.37	1988.80	8039.51		DÜNCEL TAPU MALIKI ESASTIR.
13		90-048-78	162	1	TARLA	9815.79	2341.43	6474.36		DÜNCEL TAPU MALIKI ESASTIR.
14			147	3	TARLA	5091.92	1148.04		3943.92	DÜNCEL TAPU MALIKI ESASTIR.

21C-C90-C79

Ulukapı, Manavgat





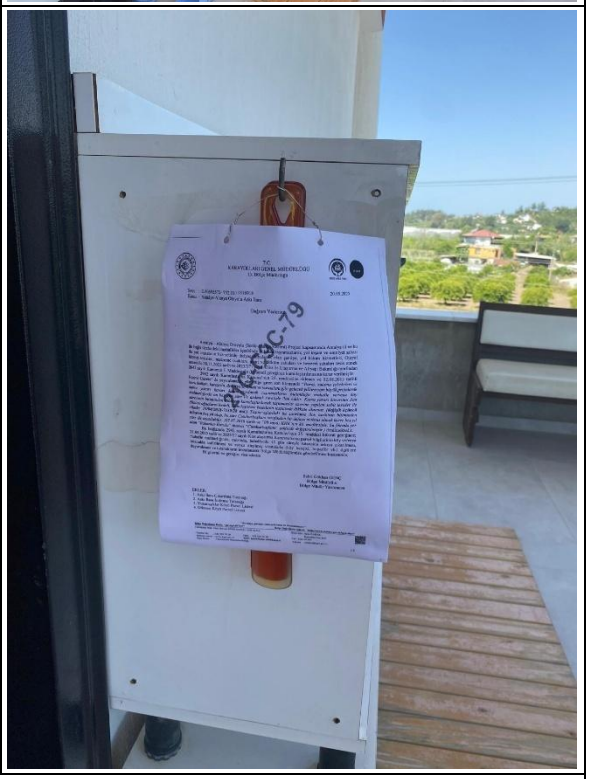


Dikmen, Manavgat









Yukariisiklar, Manavgat

Appendix H – List of Commercial Orchards

G.1. Open-field Commercial Orchards

No.	Neighbourhood	Lot/Parcel No.	Ownership	Fruit Type	Number of Trees for the Corresponding Orchard
1	Sarıabalı	258/14	Treasury	Citrus	81
2	Sarıabalı	246/1	Treasury	Olive	395
3	Sarıabalı	258/13	Treasury	Pomegranate	18
4	Sarıabalı	164/3	Treasury	Citrus	358
5	Sarıabalı	164/2	Treasury	Olive	20
6	Sarıabalı	164/1	Treasury	Olive	23
7	Sarıabalı	164/6	Treasury	Olive	86
8	Sarıabalı	164/5	Treasury	Olive	146
9	Sarıabalı	164/7	Treasury	Citrus	55
10	Sarıabalı	164/8	Treasury	Olive	73
11	Sarıabalı	164/16	Treasury	Citrus	82
12	Sarıabalı	164/15	Treasury	Citrus	60
13	Sarıabalı	164/22	Treasury	Citrus	31
14	Sarıabalı	164/23	Treasury	Olive	28
15	Sarıabalı	164/24	Treasury	Olive	20
16	Sarıabalı	164/29	Treasury	Pomegranate	96
17	Sarıabalı	164/30	Treasury	Olive	30
18	Sarıabalı	164/31	Treasury	Olive	56
19	Sarıabalı	201/2	Treasury	Pomegranate	6
20	Sarıabalı	109/4	Treasury	Citrus	10
21	Sarıabalı	164/34	Treasury	Citrus	90
22	Sarıabalı	201/4	Treasury	Pomegranate	85
23	Sarıabalı	249/1	Treasury	Pomegranate	126
24	Sarıabalı	235/1	Treasury	Olive	59
25	Sarıabalı	249/2	Treasury	Olive	54
26	Sarıabalı	298/1	Treasury	Olive	27
27	Sarıabalı	249/4	Treasury	Olive	54
28	Sarıabalı	235/16	Treasury	Pomegranate	74
29	Sarıabalı	283/22	Treasury	Citrus	11
30	Sarıabalı	283/41	Treasury	Citrus	8
31	Sarıabalı	116/1	Private	Citrus	50
32	Sarıabalı	282/5	Treasury	Citrus	15
33	Sarıabalı	282/4	Treasury	Citrus	33
34	Sarıabalı	283/3	Treasury	Citrus	17
35	Sarıabalı	283/43	Treasury	Citrus	4
36	Sarıabalı	283/32	Treasury	Citrus	16
37	Sarıabalı	283/31	Treasury	Citrus	20
38	Sarıabalı	283/30	Treasury	Citrus	44
39	Sarıabalı	283/29	Treasury	Citrus	25
40	Sarıabalı	283/28	Treasury	Pomegranate	57
41	Sarıabalı	283/39	Treasury	Citrus	21
42	Sarıabalı	283/25	Treasury	Citrus	26
43	Üründü	118/2	Private	Avocado	149
44	Üründü	133/23	Private – Limited Company	Citrus	212
45	Çakış	128/1	Private	Citrus	105
46	Çakış	128/2	Private	Citrus	241
47	Çakış	128/178	Private	Citrus	23
48	Çakış	128/3	Private	Citrus	132
49	Taşağıl	347/3792	Private	Olive	27
50	Taşağıl	347/1	Private	Olive	152
51	Taşağıl	347/3793	Private	Olive	53
52	Taşağıl	347/2	Private	Olive	220
53	Taşağıl	550/1	Private	Olive	49
54	Taşağıl	532/4	Private	Olive	81
55	Taşağıl	532/6	Private	Olive	152
56	Hocalar	158/8	Private	Olive	258
57	Hocalar	158/754	Private	Avocado	13
58	Hocalar	158/755	Private	Avocado	41
59	Hocalar	158/758	Private	Olive	59
60	Hocalar	158/757	Private	Olive	51

No.	Neighbourhood	Lot/Parcel No.	Ownership	Fruit Type	Number of Trees for the Corresponding Orchard
61	Hocalar	158/756	Private	Olive	54
62	Hocalar	158/759	Private	Olive	85
63	Hocalar	158/762	Private	Olive	136
64	Hocalar	158/763	Private	Olive	110
65	Hocalar	158/764	Private	Olive	105
66	Hocalar	158/765	Private	Olive	104
67	Hocalar	158/766	Private	Olive	105
68	Hocalar	158/767	Private	Olive	112
69	Hocalar	158/768	Private	Olive	112
70	Hocalar	158/769	Private	Olive	89
71	Hocalar	158/778	Private	Olive	281
72	Hocalar	159/3	Unknown	Olive	159
73	Hocalar	185/24	Private	Olive	156
74	Hocalar	185/25	Treasury	Olive	18
75	Hocalar	185/720	Private	Olive	126
76	Hocalar	185/745	Private	Olive	71
77	Hocalar	185/746	Private	Olive	201
78	Hocalar	185/773	Private	Olive	24
79	Hocalar	204/5	Treasury	Olive	106
80	Hocalar	208/491	Private	Olive	15
81	Hocalar	208/492	Private	Olive	3
82	Hocalar	212/28	Private	Olive	168
83	Hocalar	212/29	Private	Olive	31
84	Hocalar	212/30	Litigous	Olive	225
85	Hocalar	212/31	Private	Olive	25
86	Hocalar	212/737	Private	Olive	6
87	Hocalar	212/741	Private	Olive	30
88	Hocalar	212/744	Private	Olive	14
89	Hocalar	212/754	Private	Olive	66
90	Hocalar	212/755	Private	Olive	13
91	Hocalar	213/1	Private	Olive	12
92	Hocalar	213/697	Private	Olive	110
93	Gündoğdu	241/20	Private	Olive	62
94	Gündoğdu	241/41	Treasury	Olive	375
95	Gündoğdu	241/62	Private	Olive	215
96	Gündoğdu	241/64	Private	Olive	261
97	Gündoğdu	241/103	Treasury	Olive	14
98	Yavrudoğan	134/55	Private	Olive	17
99	Yavrudoğan	134/59	Private	Olive	158
100	Yavrudoğan	134/1452	Treasury	Olive	27
101	Yavrudoğan	138/6	Private	Apricot	896
102	Yavrudoğan	138/61	Private	Olive	30
103	Yavrudoğan	138/69	Treasury	Apricot	55
104	Yavrudoğan	138/1530	Private	Apricot	275
105	Yavrudoğan	187/6	Private	Olive	141
106	Yavrudoğan	187/7	Treasury	Olive	7
107	Yavrudoğan	237/3	Private	Olive	359
108	Çolaklı	890/2	Private	Olive	218
109	Çolaklı	956/18	Treasury	Olive	14
110	Seki	221/2	Private	Olive	50
111	Seki	821/2	Private	Avocado	83
112	Kalemler	148/1	Private – Limited Company	Olive	295
113	Şişeler	138/58	Private	Citrus	96
114	Şişeler	138/52	Private	Citrus	301
115	Şişeler	138/55	Private	Citrus	389
116	Şişeler	138/48	Private	Citrus	70
117	Şişeler	138/47	Private	Citrus	72
118	Şişeler	138/46	Private	Citrus	136
119	Şişeler	138/32	Private	Citrus	77
120	Şişeler	138/30	Private	Citrus	168
121	Şişeler	138/29	Private	Citrus	151
122	Şişeler	138/27	Private	Citrus	179
123	Şişeler	138/26	Private	Citrus	179
124	Şişeler	138/25	Private	Citrus	89
125	Şişeler	138/28	Private	Citrus	205

No.	Neighbourhood	Lot/Parcel No.	Ownership	Fruit Type	Number of Trees for the Corresponding Orchard
126	Karaöz	176/1	Treasury	Vineyard (grapes)	202
				Olive	37
127	Yukarıışıklar	172/1	Private	Avocado	180
128	Yukarıışıklar	119/41	Private	Pomegranate	338
				Avocado	50
129	Yukarıışıklar	160/8	Private	Pomegranate	149
130	Yukarıışıklar	119/43	Private	Vineyard (grapes)	338
				Olive	32
131	Evrenleryavşi	134/1	Private	Citrus	117
132	Dikmen	119/5	Private	Olive	128
133	Dikmen	119/18	Treasury	Olive	47
134	Dikmen	119/9	Private	Olive	62
135	Dikmen	121/11	Private	Citrus	133
136	Bucakşeyhler	210/11	Private	Citrus	26
137	Bucakşeyhler	128/2	Private	Pomegranate	25
138	Bucakşeyhler	205/3	Private	Citrus	49
139	Bucakşeyhler	205/18	Treasury	Citrus	12
140	Ulukapı	167/2	Private	Pomegranate	78
141	Ulukapı	167/3	Private	Citrus	26
142	Ulukapı	156/1	Private	Olive	168
143	Aşağıışıklar	208/2	Treasury	Avocado	78
144	Aşağıışıklar	121/29	Private	Olive	219
145	Aşağıışıklar	208/3	Treasury	Olive	356
146	Aşağıışıklar	128/1	Treasury	Olive	44
147	Aşağıışıklar	148/12	Treasury	Olive	171
148	Aşağıışıklar	148/15	Treasury	Olive	18
149	Aşağıışıklar	148/8	Treasury	Olive	104
150	Aşağıışıklar	148/7	Private	Olive	186
151	Aksaz	108/631	Private	Olive	42
152	Aksaz	164/1	Treasury	Vineyard (grapes)	145
153	Hacıali	214/2	Private	Citrus	58
154	Cevizler	139/30	Private	Avocado	147
155	Hacıisalı	197/31	Private	Olive	118
156	Hacıisalı	197/32	Private	Olive	160
157	Hacıisalı	198/2	Private	Olive	122
158	Hacıisalı	269/20	Treasury	Olive	85
159	Örenşehir	134/1	Private	Avocado	148
				Citrus	607
160	Taşağıl	515/77	Private	Pomegranate	99
161	Taşağıl	515/78	Private	Pomegranate	243
162	Taşağıl	515/79	Private	Citrus	785
163	Taşağıl	515/218	Private	Olive	365
				Pomegranate	225
164	Taşağıl	515/82	Private	Olive	209
165	Taşağıl	515/86	Private	Citrus	128
166	Taşağıl	515/217	Private	Citrus	41
167	Taşağıl	515/453	Private	Citrus	166
168	Taşağıl	515/222	Private	Citrus	253
169	Taşağıl	515/216	Private	Citrus	268
170	Taşağıl	515/215	Private	Citrus	17
171	Taşağıl	515/201	Private	Olive	4
172	Taşağıl	515/206	Private	Pomegranate	225
173	Taşağıl	515/213	Private	Citrus	18
174	Taşağıl	515/214	Private	Citrus	128
175	Taşağıl	515/412	Private	Citrus	31
176	Taşağıl	515/76	Private	Pomegranate	91
				Olive	91
177	Taşağıl	515/75	Private	Pomegranate	90
178	Taşağıl	515/312	Private	Citrus	55
179	Taşağıl	515/316	Private	Olive	17
180	Taşağıl	515/326	Private	Citrus	299
181	Taşağıl	515/376	Private	Olive	63
182	Taşağıl	515/378	Private	Citrus	55
				Pomegranate	238
183	Taşağıl	515/379	Private	Citrus	90
184	Taşağıl	515/382	Private	Citrus	45

No.	Neighbourhood	Lot/Parcel No.	Ownership	Fruit Type	Number of Trees for the Corresponding Orchard
185	Taşağıl	516/7	Private	Citrus	47
186	Taşağıl	516/6	Private	Olive	18
187	Taşağıl	515/414	Private	Citrus	188
188	Hocalar	270/1	Private	Olive	146
189	Kalemler	148/12	Treasury	Citrus	36
190	Kalemler	181/1	Treasury	Citrus	225
191	Kalemler	156/14	Treasury	Citrus	140
192	Kalemler	156/16	Treasury	Citrus	68
193	Kalemler	156/15	Treasury	Citrus	36
194	Kalemler	156/17	Treasury	Citrus	8
195	Kalemler	156/18	Treasury	Citrus	58
196	Kalemler	156/23	Treasury	Citrus	61
197	Kalemler	191/14	Private	Citrus	122
198	Evren	758/34	Legal Entity (DSI)	Citrus	5
199	Evren	758/33	Private	Citrus	4
200	Evren	779/1	Treasury	Citrus	46
201	Evren	773/1	Treasury	Citrus	36
202	Evren	759/2	Private	Citrus	8
203	Evren	760/10	Private	Citrus	58
204	Evren	760/24	Private	Citrus	70
205	Evren	760/26	Private	Citrus	32
206	Evren	760/25	Private	Citrus	12
207	Evren	761/20	Private	Vineyard (grapes)	25000
208	Emişbeleni	233/4	Private	Avocado	112
209	Emişbeleni	TH	Unknown	Avocado	518
210	Emişbeleni	126/14	Private	Avocado	114
211	Ilıca	0/803	Private	Citrus	98
212	Toslak	225/703	Private	Avocado	133
213	Elikesik	178/49	Private	Avocado	178

G.2. Commercial Orchards under Cover (in Greenhouses)

No.	Neighbourhood	Lot/Parcel No.	Ownership	Fruit Type	Greenhouse Areas within the Expropriation Corridor (m^2)	Approximate Number of Saplings
1	Şişeler	107/1	Private	Banana	13,048.00	2,349
2	Şişeler	135/16	Private	Banana	510.00	92
3	Evrenleryavşi	145/14	Private	Banana	1,440.00	259
4	Yukarışıklar	159/8	Private	Dragon fruit	435.00	435
5	Yukarışıklar	160/8	Private	Dragon fruit	1,000.00	1,000
6	Yukarışıklar	172/1	Private	Dragon fruit	5,350.00	5,350
7	Aşağıışıklar	122/34	Private	Banana	7,500.00	1,350
8	Aşağıışıklar	139/4	Private	Banana	1,725.00	311
9	Karaöz	112/488	Private	Banana	4,525.00	815
10	Hacıobası	121/7	Private	Banana	15,380.00	2,768
11	Uzunlar	185/1	Private	Banana	5,760.00	1,037
12	Uzunlar	211/5	Private	Banana	1,097.00	197
13	Taşağıl	515/82	Private	Banana	5,236.00	942
14	Hacıobası	129/7	Private	Banana	1,250.00	225
15	Hacıobası	129/6	Private	Banana	587.00	106
16	Hacıobası	132/39	Private	Banana	10,671.00	1,921
17	Emişbeleni	122/46	Private	Banana	5,112.00	920
18	Emişbeleni	224/8	Private	Banana	5,357.00	964
19	Emişbeleni	226/3	Private	Banana	1,415.00	255
20	Emişbeleni	231/2	Private	Banana	1,048.00	189
21	Emişbeleni	233/8	Private	Banana	1,738.00	313
22	Emişbeleni	233/5	Private	Banana	4,440.00	799
23	Emişbeleni	233/12	Private	Banana	1,480.00	266
24	Toslak	247/5	Private	Banana	1,010.00	182
25	Toslak	299/13	Private	Banana	1,210.00	218
26	Toslak	387/1	Treasury	Banana	2,136.00	384
27	Toslak	317/3	Private	Banana	4,683.00	843
28	Toslak	225/702	Private	Banana	3.500.00	630
29	Toslak	325/4	Treasury	Banana	73,00	13
30	Toslak	326/19	Private	Banana	1,801.00	324

Appendix I – Vulnerability Matrix for Economically Displaced Households

Setlement	Parcel No	Ownership (Private / Public)	Individual Vulnerabilities																												Number of different vulnerable individuals within the HH			Household-level Vulnerabilities								
			Children		Advance Old Age (over 75)		Elderly (over 65) in need of care		Illiterate		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)		Green card holder		Beneficiary of governmental aid		Employed without social security		People who do not speak and/or understand Turkish		Seasonal agricultural worker					Physically Displaced HH	Economicall y Displaced HH	Women-headed HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH resettled in the neighborhood after earthquake or other disasters	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
			Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male								
Deniz tepesi	139/6	Private											X (55)																		1	1	0		X						
Sarıabalı	116/10	Public																													0	0	0	X	X		X			65%		1
Sarıabalı	141/35	Private																	X (29)												1	1	0		X							6
Sarıabalı	164/6	Public									X	X																			2	1	1		X			X		70%		
Sarıabalı	164/7	Public																													0	0	0		X		X	X		75%		
Sarıabalı	164/16	Public										X																			1	0	1		X					53%		1
Sarıabalı	164/23	Public																													0	0	0		X		X			36%		1
Sarıabalı	164/27	Public																													0	0	0		X							1
Sarıabalı	201/2	Public										X																			1	0	1		X					41%		2
Sarıabalı	283/33	Public		X (15)														X (40)										X (40)			3	1	2		X	X		X		50%		2
Sarıabalı	283/37	Public							X (22)			X					X (22)														3	2	1		X							2
Çandır	0/957	Private									X	X																			2	1	1		X					45%		3
Cumalı	200/8	Private									X	X																			2	1	1		X							3
Cumalı	200/38	Private														X (56)	X (54)														2	1	1		X							1
Cumalı	202/93	Private										X																			1	1	0		X							1
Cumalı	202/94	Private									X																				1	1	0		X							1
Cumalı	220/1	Private										X																			1	0	1		X							3
Burma hancı	102/18	Private			X (78)	X (80)			X (78)	X (80)	X	X																			6	3	3		X			X		30%		
Burma hancı	102/55	Private									X	X																			2	1	1		X							2
Burma hancı	102/159	Private									X	X		X (47)																	3	1	2		X		X			35%		2
Burma hancı	102/172 102/1327	Private									X	X (14)																			3	1	1		X							2
Üründü	107/243	Private														X (54)															1	0	1		X							1
Üründü	117/4 117/5 117/6	Private									X																				1	1	0		X					32%		3
Üründü	131/49	Private																													0	0	0		X							2
Üründü	131/58	Private			X (75)	X (81)	X (75)	X (81)	X (75)							X (81)															6	3	3		X					24%		2
Çakış	128/158	Private						X (82)		X (82)						X (82)															3	0	3		X			X		30%		1
Taşağıl	346/1	Public										X																			1	0	1		X			X				2
Taşağıl	359/1	Private/ Public																													0	0	0		X							2
Taşağıl	370/1	Public										X				X (53)															2	0	2		X							1
Taşağıl	515/78	Private										X	X (60)																		2	1	1		X							1
Taşağıl	515/216	Private									X		X (60)																		1	1	0		X					43%		1
Taşağıl	515/221	Legal Entities				X (83)																									1	0	1		X							1
Taşağıl	515/222	Private			X (83)	X (85)						X																			3	1	2		X					40%		2
Taşağıl	533/5	Private							X (63)																						1	1	0		X			X		35%		1
Taşağıl	549/1	Private																													0	0	0		X							1
Taşağıl	550/1	Private			X (75)	X (81)			X (75)		X	X																			5	3	2		X		X	X		70%		3
Taşağıl	908/1	Public			X (81)		X (81)		X (81)		X				X (81)																6	6	0		X	X	X	X				2
Taşağıl	910/4	Litigious																													0	0	0		X							2

Setlement	Parcel No	Ownership (Private / Public)	Individual Vulnerabilities																										Number of different vulnerable individuals within the HH			Household-level Vulnerabilities								
			Children		Advance Old Age (over 75)		Elderly (over 65) in need of care		Illiterate		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)		Green card holder		Beneficiary of governmental aid		Employed without social security		People who do not speak and/or understand Turkish		Seasonal agricultural worker					Physically Displaced HH	Economically Displaced HH	Women-headed HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH resettled in the neighborhood after earthquake or other disasters	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
			Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male								
Gündoğdu	241/102	Public										X																			1	0	1		X			X			
Hocalar	103/20	Private						X (75)			X	X																			3	1	2		X						1
Hocalar	158/757	Private									X	X																			2	1	1		X		X	X		30%		1
Hocalar	158/760	Private																													0	0	0		X		X			55%		1
Hocalar	158/776	Private																													0	0	0		X						1
Hocalar	185/47	Private									X	X																			2	1	1		X			X			1
Hocalar	185/722	Private						X (65)	X (69)		X																				3	2	1		X			X			2
Hocalar	185/745	Private						X (72)				X																			2	0	2		X			X			1
Hocalar	185/756	Private										X								X (29)											2	0	2		X						2
Hocalar	212/740	Private									X	X																			2	1	1		X					36%		3
Hocalar	212/745	Private									X	X																			2	1	1		X					30%		
Yavru doğan	138/69	Public										X																			1	0	1		X					50%		2
Yavru	237/3	Private				X (79)			X (68)																						3	2	1		X	X				25%		3
doğan	237/10	Private									X	X																			2	1	1		X					27%	X	1
Yavru	268/51	Public										X																			1	0	1		X			X			1
doğan	268/73	Public									X																				1	1	0		X						1
Çolaklı	955/6	Public							X (49)		X																		X (49)		4	4	0		X	X	X	X		100%		2
Çolaklı	959/18	Public										X																			1	0	1	X	X		X			100%	2	
Seki	821/2	Private																													0	0	0		X		X			50%		1
Seki	823/2	Private									X	X																			2	1	1		X						2
Seki	824/1	Private					X (66)				X																				2	2	0		X		X			100%	X	
Seki	839/1	Public									X	X																			2	1	1		X						1
												X																			1	0	1		X		X				2
Kalemler	115/14	Public					X (74)				X				X (74)																3	3	0		X			X			3
Kalemler	148/12	Public																													0	0	0		X					50%		1
Kalemler	155/4 156/8	Public																													0	0	0		X						2
Kalemler	156/1	Public																													0	0	0		X					40%		3
Kalemler	156/6	Public										X																			1	0	1		X					55%		2
Kalemler	156/14	Public													X (39)																1	1	0		X					70%		3
Kalemler	177/10	Private																													0	0	0		X		X			100%		5
Kalemler	181/2	Private																													0	0	0		X					50%		3
Kalemler	184/4	Private					X (65)								X (65)																3	3	0		X	X					3
Kalemler	195/14	Private																													0	0	0		X					50%		2
Evren	755/1	Private			X (75)	X (76)						X																			3	1	2		X						1
Evren	758/45	Private									X	X																			2	1	1		X						2
Evren	760/3	Private									X																				1	1	0		X		X				X	2
Evren	760/11	Private																													0	0	0		X		X			40%		2
Evren	760/19	Private			X (86)	X (86)	X (86)	X (86)	X (86)		X	X				X (86)															9	4	5		X			X			
Evren	764/10	Private			X (81)	X (80)					X	X																			4	2	2		X			X			X	1
Evren	764/23	Private			X (81)		X (81)		X (81)		X																				4	4	0		X						1
Yeniköy	109/11	Private					X (65)				X	X																			3	2	1		X						1
Şişeler	138/28	Private																													0	0	0		X		X			80%		1
Şişeler	138/31	Private	X (8)								X	X																			3	1	2		X					50%		1
Şişeler	138/38	Private									X	X																			2	1	1		X			X		30%		1
Evrenler yavşi	135/5	Private									X	X																			2	1	1		X						

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			Children		Advance Old Age (over 75)		Elderly (over 65) in need of care		Illiterate		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)		Green card holder		Beneficiary of governmental aid		Employed without social security		People who do not speak and/or understand Turkish		Seasonal agricultural worker					Physically Displaced HH	Economically Displaced HH	Women-headed HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH resettled in the neighborhood after earthquake or other disasters	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
			Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male								
Evrenler yavşi	135/40	Private																	X (23)												1	1	0		X						
Evrenler Yavşi	136/12	Private	X (12)																												1	0	1		X					52%		2
Evrenler yavşi	145/26	Private									X																				1	1	0		X			X				2
Yukarı ışıklar	119/5	Private													X (59)																1	1	0		X			X				3
Yukarı ışıklar	116/43	Private									X	X																			2	1	1		X					100%		3
Yukarı Işıklar	119/457	Private									X	X						X (58)												X (58)	3	1	2		X		X			100%		3
Yukar ışıklar	158/1	Private							X (64)		X	X																			3	2	1		X					23%		
Yukarı Işıklar	160/8	Private							X (69)			X																			2	1	1		X							2
Dikmen	119/8	Private																													0	0	0		X		X			22%		1
Dikmen	119/23	Public																													0	0	0		X		X			75%		1
Bucak şeyhler	128/2	Private									X					X (69)															2	1	1		X							1
Bucak şeyhler	128/5	Private									X	X																			2	1	1		X							1
Bucak şeyhler	205/18	Public							X																						1	1	0		X			X				1
Bucak şeyhler	205/19	Public																													0	0	0		X							1
Ulukapı	156/1	Private									X																				1	1	0		X			X		100%		1
Aşağı ışıklar	121/20	Private																													0	0	0		X		X			60%		3
Aşağı ışıklar	121/23	Private				X (94)		X (94)			X					X (94)															4	1	3		X					30%		4
Aşağı ışıklar	148/16	Public										X																			1	0	1		X		X					1
Aşağı ışıklar	208/2	Public									X	X		X (60)																	3	1	2		X		X	X		20%		
Karaöz	108/496	Private									X	X																			2	1	1		X		X			20%		2
Karaöz	116/17	Private																													0	0	0		X							1
Karaöz	116/941	Private									X	X																			2	1	1		X			X		50%		1
Aksaz	108/11	Private			X (75)	X (76)					X	X																			4	2	2		X						X	1
Aksaz	108/12	Private									X	X																			2	1	1		X		X	X				1
Hacıali	170/1	Private				X (75)			X (73)		X	X																			4	2	2		X			X	X (Fire)	23%		
Hacıali	235/7	Public							X (65)		X																				2	2	0		X						X	
Cevizler	139/31	Private			X (79)	X (79)	X (79)				X	X																			5	3	2		X		X	X		100%		1
Hacıisalı	197/10	Private									X	X		X (72)																	3	1	2		X			X				
Hacıisalı	197/38 197/1 197/27	Private																													0	0	0		X					45%		4
Hacıisalı	198/14 198/11	Public			X (80)	X (83)	X (80)		X (80)		X	X			X (80)																7	5	2		X			X		15%		2
Hacıisalı	254/1	Public				X (76)					X	X																			3	1	2		X					70%		2
Hacıobası	103/9	Private																													1	1	0		X	X	X	X		45%		2
Hacıobası	103/204	Private			X (81)																										1	1	0		X		X			37%	X	
Hacıobası	105/2	Private									X	X																			2	1	1		X					36%	X	1
Hacıobası	105/1376	Public				X (84)								X (84)																	2	0	2		X			X				1
Hacıobası	132/50	Private									X	X																			2	1	1		X							3

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			Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male								
Hacıobası	134/12	Private																													0	0	0		X			X			3
Uzunlar	101/20	Private									X	X				X															2	1	1		X		X	X			4
Uzunlar	101/33	Private											X (63)																		1	1	0		X						2
Uzunlar	181/7	Public																													0	0	0		X		X				1
Uzunlar	185/1	Private				X (77)					X	X																			3	1	2		X						2
Uzunlar	200/21	Private					X (65)				X	X			X (65)																4	3	1		X		X				6
Kadılar	104/20	Private									X	X																			2	1	1		X						1
Kadılar	104/22	Private										X			X (55)	X (64)															3	1	2		X						2
Kadılar	115/277	Private									X	X				X (63)															3	1	2		X						1
Kadılar	131/6	Private					X (70)				X		X (70)		X (70)								X (70)								6	6	0		X	X		X			1
Kadılar	139/9	Private			X (82)	X (82)			X (82)		X	X																			5	3	2		X						1
Örenşehir	118/2	Private									X	X																			2	1	1		X						2
Yalçıdibi	110/14	Private													X (60)																1	1	0		X	X					3
Yalçıdibi	119/66	Private												X (65)																	1	0	1		X						4
Yalçıdibi	119/87	Private									X	X																			2	1	1		X						1
Yalçıdibi	119/88	Private									X		X (60)																		2	2	0		X						3
Yalçıdibi	120/2	Private			X (80)		X (80)		X (80)		X																				4	4	0		X						
Yalçıdibi	120/18	Private			X (75)	X (75)																									2	1	1		X						1
Odaönü	102/1	Private										X																			1	0	1		X			X			8
Karakaya	102/11	Private																													0	0	0		X		X				1
Karakaya	106/1	Private																											X (52)		1	0	1		X			X			3
Karakaya	124/26	Private																													0	0	0		X		X				2
Karakaya	124/74	Public					X (66)	X (66)			X	X			X (66)	X (66)															6	3	3		X						1
Karakaya	124/75	Private										X																			1	0	1		X		X				1
Karakaya	133/21	Private			X (80)		X (80)		X (80)		X																				5	5	0		X		X	X		X (BOTAŞ)	2
Alara	124/84	Private			X (77)						X																				2	2	0		X						2
Alara	124/277	Public				X (75)			X (73)		X	X																			4	2	2		X		X				1
Alara	113/32	Private										X																			1	0	1		X		X				1
Alara	131/1	Private																													0	0	0		X						2
Alara	131/13	Private																													0	0	0		X						3
Alara	133/1	Private									X	X																			2	1	1		X						1
Alara	133/33	Public																													0	0	0		X						1
Alara	133/19	Private									X																				2	2	0		X	X					1
Alara	156/25	Private			X (75)	X (85)						X																			3	1	2		X		X				1
Alara	156/87	Public																													0	0	0		X						4
Alara	156/96	Public																													0	0	0		X		X				3
Alara	156/93	Public										X																			1	0	1		X			X			2
Alara	156/101	Public									X	X																			2	1	1		X						1
Alara	160/1 133/24 133/25	Private									X																				1	1	0		X			X			4
Alara	165/5	Public																													0	0	0		X						4
Alara	195/2	Private									X																				1	1	0		X						3
Çakallar	121/37	Private									X	X																			2	1	1		X		X				2

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			Children with special needs	Children of school age who do not attend school	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male									
Çakallar	143/3	Private				X (85)		X (85)		X (85)		X X X						X (56)						X (85)							8	0	8		X		X			###		1
Incekum	201/22	Private																													0	0	0		X							1
Türkler	239/12	Private									X	X																			2	1	1		X							2
Türkler	239/14	Private									X	X				X (65)															3	1	2		X		X	X		100%		2
Emişbeleni	203/1	Public							X (60)																						1	1	0		X		X			50%		1
Emişbeleni	216/1	Private																													0	0	0		X							1
Emişbeleni	224/6	Private																													0	0	0		X					75%		3
Emişbeleni	233/8	Private																													0	0	0		X		X			100%		6
Toslak	158/2548	Private					X (72)				X																				2	2	0		X					100%		
Toslak	247/2	Private																													0	0	0		X					35%		2
Toslak	251/10	Private										X			X (18)		X (18)														3	2	1		X							2
Toslak	251/31	Private																							X (32)						1	0	1		X			X		50%		
Toslak	251/42 251/49 253/5	Public																													0	0	0		X					84%		5
Toslak	286/3	Private										X																			1	0	1		X		X			99%		1
Toslak	299/15 299/35	Private Public																													0	0	0		X		X			73%		2
Toslak	326/21	Private							X (65)		X (9)	X																			3	2	1		X					40%		2
Telatiye	121/1	Private									X (9)	X																			2	1	1		X							
Telatiye	127/5	Private									X (9)																				1	1	0		X					57%		4
Telatiye	439/2	Litigious																													0	0	0		X					75%		3
Elikesik	173/48 173/47 173/50	Public Private							X (53)			X																		X (56)	3	1	2		X		X	X				3