

ANTALYA-ALANYA MOTORWAY PROJECT

STAKEHOLDER
ENGAGEMENT PLAN

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LIST OF ABBREVIATIONS

AAOİAŞ	Antalya Alanya Otoyol İnşaat Yatırım ve İşletme A.Ş.
AFAD	Prime Ministry's Disaster and Emergency Management Presidency
ANTOK	Antalya Orchids and Biodiversity Protection Association
BOT	Build, Operate and Transfer
BOTAS	Petroleum Pipeline Company
CEKUL	Foundation for the Protection and Promotion of the Environment and Cultural Heritage
CIMER	The Presidency's Communication Centre
DSİ	General Directorate of State Hydraulic Works
EIA	Environmental Impact Assessment
EP	Equator Principles
IFC	International Finance Corporation
AIIB	Asian Infrastructure Investment Bank
ESIA	Environmental Social Impact Assessment
GBV	Gender-Based Violence
GLAC	Guide to Land Acquisition and Compensation
GM	Grievance Mechanism
IFIs	International Finance Institutions
INTES	Union of Construction Industry Employers
ISKUR	General Directorate of Turkish Employment Agency
MoEUCC	Ministry of Environment, Urbanization and Climate Change
ARHB	Antalya Regional Heritage Board
PAP	Project Affected People/Population
PCMs	Public Consultation Meetings
PPM	Project-affected People's Mechanism
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TOBB	The Union of Chambers and Commodity Exchanges of Turkey
TURK-IS	Confederation of Unions of Turkish Workers
WGM	Workers' Grievance Mechanism
WWF	World Wide Fund for Nature
YIMER	The Foreigners Communication Centre
YOL-IS	Union of Turkish Roads, Buildings and Construction Workers

I. INTRODUCTION

This Stakeholder Engagement Plan (“the Plan” or “SEP”) has been prepared by ENCON Environmental Consultancy Co. (Consultant) for Antalya-Alanya Motorway Project (the “Project or AAMP”) in Türkiye. This SEP will be updated in the event of significant changes in the Project and will be reviewed and updated at least annually.

Ministry of Transport, and Infrastructure (former Ministry of Transport, Maritime Affairs and Communications), General Directorate of Highways (“KGM” or “the Administration”), as the owner of the Antalya-Alanya Motorway Project, has tendered for a contract in May 2010 in accordance with the Law on Implementation of Some of the Investments and Services in the Framework of Build, Operate and Transfer Model (Law No: 3996). As a result of the tendering process, KGM has awarded Limak (the Project Sponsor) with a Build, Operate and Transfer (BOT) contract for the implementation of the Project. In this regard, Limak is referred as Project Sponsor in the scope of the plan, and in the ESIA studies.

In accordance with the provisions of the BOT contract, the Project encompasses financing, planning/design, construction, operation, maintenance, and all repair works throughout the operation period, including the transfer of the Motorway to the KGM at the end of the contract period. It is also expected that at the end of the contract period, the Motorway will be handed over to KGM free of any debt or obligation, in a well-maintained and operational condition, without any charges. The Project Sponsor's rights to operate maintain, and repair the Motorway will expire at the end of the contract period specified in the BOT contract.

Stakeholder engagement is the basis for establishing sustainable, constructive, and responsive relationships that are essential for successfully managing a project's environmental and social impacts. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with a various external stakeholders thought the duration of the project. Initiating the engagement process in the early phases of the project helps ensure timely public access to all relevant information. It provides the stakeholders with an opportunity to input into the project design and the assessment of impacts.

The SEP should be easy to understand and straightforward. Its primary focus should be describing the project and identifying the stakeholders involved. It is crucial to determine the information available to the public and where it can be accessed. The SEP must also explain how the public can share their views and opinions, provide a deadline for requirements, and outline how individuals will be notified about any new information or opportunities for feedback or comments. The plan also aims to establish a project-based structure and approach to prevent Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) throughout the project's entire lifecycle. SEP will be designed to enable the Project Sponsor, Contractor Company, affected local communities, and all other stakeholders to identify and establish an effective engagement strategy.

In addition to this SEP, to provide people affected by Project-related land acquisition (“Project Affected People” or “PAPs”) with a clear and concise overview of the expropriation process carried out by KGM in accordance with the Expropriation Law, and summarise the key principles of Project's Resettlement Action Plan (RAP), particularly regarding additional compensation and assistance measures that go beyond the legally mandated cash compensation to ensure alignment with international standards and Lender requirements, stand-alone Guide to Land Acquisition and Compensation (GLAC) documents have been prepared for the Project and finalised in October 2025 for distribution in affected settlements. There are three versions of the GLAC: (i) for affected lands, (ii) for affected houses, and (iii) for affected businesses (see ANNEX-5.A, ANNEX-5.B, ANNEX-5.C). In addition, the Project information brochure (ANNEX-4) has been distributed during Public Consultation Meetings (PCMs) and continues to be distributed in subsequent meetings. It will be updated and re-distributed throughout the process as needed. Kurdish and Arabic versions of the brochure has also been prepared and shared when necessary. Also, to support the information process related to expropriation and RAP, the SPV distributed printed copies of KGM's booklet on procedural steps of expropriation in affected settlements (presented in RAP – Appendix F) in all affected settlements in May 2025. Distribution of additional copies will continue in line with the Project's expropriation and construction schedules, as needed.

I.1 Purpose and the Scope of the Stakeholder Engagement Plan

The SEP is a public document which presents plans for stakeholder engagement, information disclosure and consultation. This Plan is valid for the both construction and operation phase of the Project.

SEP covers the following aspects:

- Applicable national and international regulations and IFC requirements on stakeholder engagement, particularly IFC PS1;
- Project plans to engage with stakeholders during the construction phase and the operation phase of the Project;
- Key Project stakeholders that will be identified and will be interacted with;
- Strategy for consultation and information disclosure;
- Timetable for various stakeholder engagement activities;
- Resources and responsibilities for the implementation of the SEP;
- Means of monitoring and reporting on consultation and disclosure activities; and
- A grievance mechanism for stakeholders and the public to raise concerns, provide feedback and comments about the Project operations and how complaints/comments will be handled.

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts. Stakeholder engagement process helps to:

- Identify the stakeholders that are affected, and/or able to influence the Project and its activities;
- Identify their particular interests and requirements related to the Project;
- Generate a good understanding of the Project among those that will be affected;
- Identify issues early in the Project cycle that may pose risks to the Project or its stakeholders;
- Provide to these groups opportunities to voice their concerns and opinions;
- Define a consultation approach for stakeholders in relation to operation of the Project;
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process;
- Ensure that mitigation measures are appropriate (implementable, effective and efficient);
- Ensure that adequate and timely information is provided to those potentially affected by a project;
- Ensure a technically and culturally appropriate approach to engagement with all key stakeholders;
- Establish a system for long-term communication between the Project and communities that is of benefit to all parties.
- Identify resources and responsibilities for implementation and monitoring of the consultation program; and
- Set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

The ultimate purpose of this SEP is to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's environmental and social impacts. The SEP is the responsibility of Project Sponsor and Project Sponsor is fully committed to undertaking necessary engagement activities in a manner that is consistent with international standards and national legislation as outlined in next sections.

The SEP encompasses planned stakeholder consultation activities and the process of stakeholder engagement. The SEP is prepared in compliance with IFC Performance Standards and international requirements and best practices, in addition to Turkish legislation.

I.2 Project Description

The Project (Antalya-Alanya Motorway Project) is one of the two sub-projects that constitute the Afyonkarahisar-Alanya Motorway Project and is designed to connect Serik and Alanya districts through Manavgat district of Antalya province. The project aims to improve transportation services and connectivity to surrounding provinces such as Burdur, Muğla, Konya, Isparta, Karaman, and Mersin. As of April 2025, the motorway is designed to be 117.8 kilometers long and will mainly consist of three lanes, with some sections having two lanes (3x2 and 2x2) in each direction.

Figure I.1 presents the current design of Antalya-Alanya Motorway Project's route.

The current Project design includes a total of 117.8 km of road, comprising 84 kilometers of main road (motorway) and 33.8 kilometers of access roads (see Table I.1)

Table I-1. Antalya-Alanya Motorway Sections in the scope of the Project

Project	Start and End Locations of the Section (Km)		Length of the Road (Km)		
	Start Location	End Location	Main Road (Motorway)	Access Roads	Total
Antalya-Alanya Motorway	Km 52+000	Km 136+000	84+000	33+800	117+800



Figure I-I The Route of the Antalya-Alanya Motorway Project

II. PUBLIC CONSULTATION/STAKEHOLDER ENGAGEMENT REQUIREMENTS

Implementation of the Project will follow the framework laws and regulations of the Republic of Türkiye as well as applicable international standard, IFC requirements. In this context, stakeholder engagement activities will conform to relevant IFC Performance Standards (i.e. IFC PS1) Equator Principles 4 (EPFI 5 Stakeholder Engagement, Principle 6 Grievance Mechanism and EU Directives).

Further details of the relevant Turkish legislation and applicable international requirements are provided in the following sections.

II.1. National Regulations and Requirements

Under Article 10, Environmental Law sets out the general scope of the Environmental Impact Assessment (EIA) procedure in Türkiye, indicating that institutions, agencies and establishments that lead to environmental problems as a result of their planned activities are obliged to prepare environmental impact assessment report or Project Information File. Based on this legal framework, the EIA Regulation was put into force for the first time after being published in the Official Gazette numbered 21489 and dated on February 7, 1993. Since then there had been several amendments in the first regulation and new EIA regulations were published in 2008, 2013 and 2014 repealing the former regulations in force. The latest EIA Regulation (2022 EIA Regulation) has been published in the Official Gazette dated 29.07.2022 and numbered 31907, which repealed the 2014 EIA Regulation.

Under its annexes, the EIA Regulation categorizes investments as projects subject to full EIA (Annex-1) and projects subject to screening-elimination criteria (Annex-2). This categorization is done based on the type of activity and/or plant capacity. If the planned investment is defined as an activity under Annex-1 of the EIA Regulation, a full EIA Report is required. For Annex-2 activities, first a Project Information File is prepared in accordance with a limited format specified in the Annex-4 of the EIA Regulation and the MoEUCC evaluates the need for a full EIA process for the project.

The categorization for motorway projects under Turkish EIA regulation is done according to the type or length of the road (km) as follows:

- Full EIA process is required for the following Annex-1 activities;
 - Highways and state motorways (Article 9-c).

- Limited EIA process is required to be conducted for the following Annex-2 activities;
 - Facilities with a production capacity of 5 tons/hour and above, producing shaped materials using cement or other binding materials (Article 18-c),
 - Asphalt plants (Article 22),
 - Provincial roads and ring roads (except neighborhood/village roads; Article 28-d),
 - Addition of tunnels to highways or railways (Article 28-e).

The Project's EIA Report had been prepared in March 2016, submitted to the MoEUCC, reviewed by the evaluation committee and EIA Positive decision had issued in June 2018 In accordance with the EIA legislation in force on the date when the Project EIA Positive Decision was given (2014 EIA Regulation), the EIA Report of the Project has the vested right of upholding its EIA Positive Decision validity for 7 years before the start of the construction works for the Project.

In accordance with the related article, it is the legal responsibility of a project owner to organize an official Public Consultation Meeting for the projects that are included in Annex 1 of the Regulation (as the case in the EU EIA Directive).

As a result, Project Sponsor aims to develop a communication plan to inform relevant stakeholders about the Project activities in operation phase in line with this SEP.

Turkish national policy on protection of environment, cultural heritage and conservation of biological resources has been constituted on the base of relevant international agreements that Türkiye has signed or ratified.

Freedom of Thought and Opinion (Part 2, Fundamental Rights and Duty- Article 25)

Everyone has the right to freedom of thought and opinion and should not be compelled to reveal or be blamed for them.

Freedom of Expression and Dissemination of Thought (Part 2, Fundamental Rights and Duty- Article 26)

Everyone has the right to express and share their thoughts and opinions through speech, writing, pictures, or other media, individually or collectively, and to receive and communicate information and ideas freely without interference from official authorities.

Right of Petition, Right to Information, and Appeal to the Ombudsperson (Part 2, Fundamental Rights and Duty- Article 74)

Citizens and foreign residents can submit their requests and complaints in writing to the authorities and the Turkish Grand National Assembly based on the principle of reciprocity.

Other main national laws/regulations:

Civil Law (Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607))

Real property rights and restrictions are defined under the relevant section of Civil Law and will be considered and met throughout the Project according to Turkish Civil Law.

Law on the Right to Information (Law No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269)

The Right to Information Law ensures access to information based on the principles of equality, impartiality, and openness. Everyone has the right to information about public institutions and qualifying professional organizations.

Law on the Use of Right to Petition (Law No.3071 (Issued on 10.11.1984, Official Gazette No. 18571)

Under Article 3 of the Law on the Use of Right to Petition, Turkish citizens and foreign residents have the right to submit written requests and complaints in Turkish to the Turkish Grand National Assembly and relevant authorities.

Expropriation Law (Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215))

Another law related to the involvement of stakeholders in the Project is the Expropriation Law.

The Expropriation Law requires public disclosure and a meeting process. It starts with the approval of the relevant authority for the expropriation works in the public interest. This decision is made public for 15 days at the village or neighborhood mukhtars' office, after which it becomes the "cut-off date."

The administration action of the expropriation process is performed in line with the Expropriation Law according to its purpose, authorization, procedure, reason, and the subject of the action.

The responsible agency for Antalya-Alanya Motorway Project (the expropriation procedures will be carried out by KGM) establishes a Valuation Commission to determine the values of assets and resources. Subsequently, a negotiation commission is established to negotiate with property owners on the value. Each negotiation commission consists of at least three members. The Commission sends an official invitation letter to each property owner without disclosing the previously estimated value of the asset.

The Environmental Impact Assessment Regulation (Official Gazette No: 31907, Article 9)

The EIA Regulation, originally from 1998, has had revisions and was most recently amended on July 29th, 2022. It is based on the EU EIA Directive but includes Turkish laws, making it distinct.

1. The meeting to inform the public about the investment and receive their opinions is held at a central place and time determined by the provincial directorate, with the participation of qualified institutions/organizations, the Ministry, and the project owner.
2. An announcement with the meeting details must be published in a newspaper at least 10 days before the meeting and in a local periodical specific to the region where the Project will be carried out.
3. A public meeting will be chaired by the provincial director or an appointed official to inform and consult with the public about a project. Attendees will be informed about the Project, and their opinions, suggestions, and objections will be recorded in meeting minutes. The minutes will be sent to the Ministry, with a copy kept by the provincial directorate.
4. Before finalizing the format, the Commission members should visit the planned project area and participate in the public information and consultation meeting on the specified date.
5. Stakeholder Engagement Plan (SEP) is prepared by authorized institutions to inform the public about the Project, receive their opinions and suggestions, and is presented in the EIA application file annex. Authorized institutions may request additional activities, such as distributing brochures, conducting surveys and seminars, or preparing a website. The plan may be updated if requested by the Ministry during the EIA process.

The lead government agency responsible for environmental protection in Türkiye is the Ministry of Environment, Urbanization and Climate Change ("MoEUCC"). MoEUCC is the responsible organization for the issuing and implementation of policies and legislation adapted for the protection and conservation of the environment and sustainable development and management of natural resources.

The main responsibilities of the MoEUCC, relevant to the Project, are:

- Implementation of the EIA regulations and decision-making in the EIA approval processes,
- Setting policies and principles for environmental management in Türkiye, including the administrative framework for environmental enforcement,
- Defining and applying environmental quality standards,
- Supervision of the network of environmental laboratories in Türkiye,
- Pollution control and inspection activities,
- Agroforestry support, soil management and erosion control, and
- Protection of Türkiye's natural heritage, including national parks, areas of conservation interest, biodiversity, and wildlife.
- The Gender Based Violence (GBV) Regulation The laws in force in Türkiye related to GBV issues are listed below with publication dates and numbers;
 - Labor Law (Law No. 4857, Issued on 10.06.2003)
 - Turkish Criminal Law (Law No. 5237, Issued on 12.10.2004)
 - Law of Protection of Family and Prevention of Violence Against Women (Law No. 6284, Issued on 20.03.2012)

The purpose of Labor Law (4857) is to govern the rights and responsibilities of workers employed under an employment contract and the working conditions provided by employers. This law applies to all workplaces, employers, employer representatives, and their employees, regardless of their field of activity. According to Articles 24 and 25, termination of the contract is permissible in the event of Sexual Harassment (SH) in the workplace, allowing the employee or employer to terminate the contract before the term's expiration or without waiting for the notification period.

Turkish Criminal Law aims to prevent crimes and safeguard the rights and freedoms of individuals, public order, security, public health, the environment, and community peace. Articles 102, 103, 104, and 105 in Section 6 detail GBV-related offenses and their penalties, including sexual assault, sexual abuse of children, sexual intercourse with a minor, and sexual harassment.

Law on Protection of Family and Prevention of Violence against Women (6284) is the cornerstone of Türkiye's response to violence against women. This law aims to regulate procedures and principles for the protection of women, children, all family members, and individuals subjected to persistent pursuit. It is rooted in the Turkish Constitution, international conventions to which Türkiye is a state party and relevant legal regulations.

Some key features of the Law No. 6284 include:

- Empowering local authorities to issue injunctions swiftly and efficiently in emergencies.
- Providing support services for survivors and perpetrators of violence, establishing Violence Prevention and Monitoring Centers and outlining the basics for temporary financial aid and medical expenses.
- Introducing preventive and protective measures for survivors, including forced imprisonment in case of a violation of preventive measures, and establishing a mechanism for monitoring the effective implementation of measures.
- Designating the Ministry as an active agent in the prevention of violence against women, granting it various responsibilities, including involvement in judicial cases.
- Basic principles to be observed in the implementation of this law include:
- Providing support and services to victims of violence through a fair, effective, and swift procedure based on basic human rights and equality between men and women.
- Fulfilling measures for victims and perpetrators of violence in a manner consistent with human dignity.
- Ensuring that special measures preventing gender-based violence against women and protecting women from such violence are not interpreted as discrimination under this law.

II.2. International Requirements and Best Practices

International financial institutions follow certain policies and procedures regarding assessment and management of environmental and social impacts of the projects to be financed. The relevant environmental and social requirements of these institutions are mainly based on World Bank Group (WBG) Safeguard Policies. For the private sector financing, WBG/International Finance Corporation's (IFC) Environmental Health and Safety Guidelines and Performance Standards on Environmental and Social Sustainability, as well as the Environmental and Social Policy and Standards of the Asian Infrastructure Investment Bank (AIIB), have become some of the most important international requirements. These standards have also been adopted by the major international private banks through the so called Equator Principles (EPs). These principles aim to ensure that projects to be financed by these banks are developed in a socially and environmentally sound manner.

The Project is intended to meet applicable international standards and best practices of the International Finance Institutions (IFIs). IFIs consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits. In this context, SEP follows the requirements of EU directives, IFC PS1 and EPFI Principle 5 and EPFI Principle 6. The IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts covers public consultation and disclosure and in this respect, required consultation and disclosure activities have to be conducted taking the scale and nature of the Project into account covering the following:

- Identifying the range of stakeholders;
- Providing affected communities with access to relevant project information;
- Implementing and maintaining a grievance mechanism; and
- Engaging with and providing information to project-affected and other interested parties throughout the life-cycle of the Project.

II.2.1. AIIB Environmental and Social Policy and Standards

The Asian Infrastructure Investment Bank (AIIB) applies its Environmental and Social Policy (ESP, 2016) and the accompanying Environmental and Social Standards (ESSs) to ensure that all projects it finances are implemented in a manner that is environmentally and socially sustainable. The ESP sets out AIIB's vision to integrate environmental and social considerations into all aspects of its operations and requires borrowers to identify, assess, and manage the environmental and social risks and impacts associated with their projects.

The AIIB's three Environmental and Social Standards (ESSs) define the mandatory requirements for borrowers:

ESS 1: Environmental and Social Assessment and Management

Establishes the process for assessing and managing environmental and social risks and impacts, including stakeholder engagement and information disclosure.

ESS 2: Involuntary Resettlement

Aims to avoid or minimize physical and economic displacement and requires fair compensation and livelihood restoration for affected persons.

ESS 3: Indigenous Peoples

Ensures respect for the rights, dignity, and culture of Indigenous Peoples and promotes their full participation in project design and implementation.

Stakeholder engagement is a core requirement under ESS 1, which obliges the client to establish and maintain a Stakeholder Engagement Plan (SEP) proportional to project risks and impacts, ensuring continuous, inclusive, and transparent dialogue with affected communities.

In addition, AIIB provides affected communities with access to its Project-affected People's Mechanism (PPM) — an independent accountability mechanism through which individuals or groups who believe they are or may be adversely affected by an AIIB-financed project can raise their concerns directly with the Bank.

II.2.2. Equator Principles IV

Principle 5: Stakeholder Engagement

For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.

Principle 6: Grievance Mechanism

For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the Environmental and Social Management System, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user.

Principle 10: Reporting and Transparency

In addition, regarding reporting and transparency, Principle 10 requires the client to make at a minimum, a summary of the ESIA that includes a summary of Human Rights and climate change risks and impacts when relevant accessible and available online for all Category A and, as appropriate, Category B Projects.

II.2.3. IFC's Standards and Guidelines

IFC published its current Policy on Environmental and Social Sustainability in 2012. Within the framework of this Policy, it applies a comprehensive set of Performance Standards to manage social and environmental risks and impacts and to enhance development opportunities in its private sector financing in the member countries eligible for financing. The Performance Standards may also be applied by other financial institutions electing to apply them to projects in emerging markets.

The following eight Performance Standards establish the requirements that the client has to meet throughout the life of an investment supported by IFC or other relevant financial institution using these Standards:

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

PS 1 defines Stakeholder engagement as an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities. According to IFC PS 1;

- Clients should identify the range of stakeholders that may be interested in their actions and consider how external communications might facilitate a dialogue with all stakeholders. Where projects involve specifically identified physical elements, aspects and/or facilities that are likely to generate adverse environmental and social impacts to Affected Communities the client will identify the Affected Communities and will meet the relevant requirements.
- The client will develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities.
- The client will provide Affected Communities with access to relevant information on (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.
- The client will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures.
- The client will conduct an Informed Consultation and Participation (ICP) process that will build upon the steps outlined above in the Consultation and will result in the Affected Communities' informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on

matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

IFC PS2 (Labor and Working Conditions) specifically relates to harassment, intimidation, and/or exploitation. According to IFC PS 2;

- The client will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women.

Retaliation Risk Prevention and Safe Stakeholder Participation

The Project is committed to ensuring that all stakeholders can freely express their concerns without fear of retaliation. In alignment with the IFC Good Practice Note for the Private Sector: Addressing the Risks of Retaliation Against Project Stakeholders (2021), a series of practical measures have been integrated into the Stakeholder Engagement Plan (SEP) to safeguard stakeholder participation.

As part of the stakeholder identification and mapping process, the Project conducts a risk assessment to identify potential threats of retaliation, particularly toward vulnerable or marginalized groups. This assessment is used to design safe and inclusive engagement approaches tailored to local sensitivities. To further support this, the Grievance Mechanism (GRM) offers multiple anonymous reporting options—such as locked suggestion boxes and secure hotlines—ensuring that all personal data is managed with strict confidentiality in line with national data protection laws and IFC Performance Standard 1.

Sensitive issues, especially those related to gender-based violence and harassment (GBVH), are handled by trained female Social Chief and Community Liaison Officers (CLOs), who adopt a survivor-centered approach and ensure privacy and trust throughout the reporting process. In addition, project staff and grievance handlers receive specific training to recognize and respond to signs of intimidation or retaliation, using appropriate internal protocols to ensure timely and secure handling of such cases.

Allegations or risks of retaliation are closely monitored and promptly escalated to senior management, where necessary. The Project has adopted a zero-tolerance policy for retaliation in any form—whether by project personnel, contractors, or third parties—reinforcing a culture of safety, respect, and open dialogue for all stakeholders involved.

II.2.4. IFI Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation

Recognizing the important role they play in both the example they set in their own institutional practices and in the high standards they adopt in their projects and operations, in April 2018, the IFIs reaffirmed their commitment to advance standards to prevent sexual harassment, abuse and exploitation through seven principles. According to IFIs reaffirm their commitment to (Principle 2) establish and maintain standards aimed at preventing sexual harassment, abuse, exploitation and other forms of misconduct. Implementation of this principle can be seen in the following:

- All IFIs maintain codes of ethics/conduct which embed high ethical standards and include provisions on harassment and misconduct including sexual misconduct which are applicable to staff behavior both within and outside the institution. Some IFIs have also adopted specific policies aimed at preventing and responding to sexual harassment, exploitation and abuse. These are applicable to all staff and are reviewed periodically and strengthened as needed.
- Some IFIs include behavioral clauses in contracts of appointment for non-staff members (including consultants, and contractors) to ensure that they too adhere to expected high standards of behavior. Breach of such provisions would provide an IFI with a right to terminate the underlying contract.

III. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

In the scope of Antalya-Alanya Motorway Project, various studies were carried out with both internal and external stakeholders before the planned Public Consultation activities in the scope of this SEP. The Project Sponsor recognizes the importance of the stakeholder engagement activities and will carry out the activities planned under this SEP in order to make these activities more efficient, inclusive and continuous. Both internal and external previous stakeholder engagement activities are described in this section.

III.1. Public Consultation Meetings (PCMs) in the Scope of EIA Process

Within the scope of the EIA studies, one public consultation meetings were held alongside the route. The aim of the public participation meeting is to inform people who may be potentially affected about the Project and to understand their concerns, opinions and suggestions about the project. This process is the only formal requirement for stakeholder participation according to Turkish legislation.

The stakeholder engagement activities specific to the Project started at the time of the national EIA process. In this context, Antalya Provincial Directorate of Environment and Urbanization, relevant district Municipalities, District Governorships and Neighborhood/Village mukhtars were contacted in March 2016 to organize the stakeholder engagement activities. The formal stakeholder engagement meetings (public consultation meeting), a requirement of the Turkish EIA Regulation, were held on April 7th, 2016, at Ekşili Village Coffeehouse, Alanya Municipality Çıplaklı Wedding Hall, and Manavgat Chamber of Commerce and Industry Assembly Meeting Hall. Therefore, a total of three consultation meetings were held at three different districts of the Project route (based on EIA report, 2018): Döşemealtı, Alanya, and Manavgat districts of Antalya Province. Table III.1 shows the meetings were announced in one local and one national newspaper as per the regulatory requirements. The meetings comprise the presentation of the Project details such as construction and operation activities, and noted the comments and suggestions by participants during the meetings. The relevant opinions and suggestions are presented in Table III.2.

Table III-1. Information of PCMs in EIA Process

PCMs	Districts	Date	Time	Location
1	Döşemealtı	07.04.2016	09:30	Ekşili Village Coffeehouse
2	Alanya	07.04.2016	11:00	Alanya Municipality Çıplaklı Wedding Hall
3	Manavgat	07.04.2016	15:00	Manavgat Chamber of Commerce and Industry Assembly Meeting Hall

Table III-2. Questions, Opinions, and Suggestions Submitted During the Public Consultation Meeting

Location – Date – Time	Question, Comment, or Suggestion	Response	Main Discussion Points & Feedback Summary
Ekşili Village Coffeehouse / 07.04.2016 – 09:30	A specific location along the project route was mentioned, and concerns were raised regarding the expropriation of houses and pastures. A question was asked about the possibility of changing the route.	It was explained that due to elevation differences and geometric conditions at the connection point, the current route had been selected.	Local concern over property loss and desire for route revision; project constraints due to topography. This issue explained in the Institutional and Legal Framework Chapter.
	A question was raised about whether there is a railway project along the route.	The presence of a railway project was acknowledged, and it was explained that it is a separate and unrelated project.	Clarification requested regarding interaction with other infrastructure projects. This issue explained in the

Location – Date – Time	Question, Comment, or Suggestion	Response	Main Discussion Points & Feedback Summary
	Questions were asked regarding the expropriation process (e.g., number of affected properties, areas involved, and procedures).	It was stated that the entire process would be carried out in accordance with the Expropriation Law.	Cumulative Impact Assessment Chapter. Community members requested clarification regarding the legal procedures and scope of land acquisition. This matter is addressed in detail within the Institutional and Legal Framework section and throughout the RAP.
Çıplaklı Wedding Hall / 07.04.2016 – 11:00	Concerns were raised about the environmental pollution that may occur during construction and operation phases, and its potential impact on nearby settlements and agricultural products. A request was made to change the route.	The route was shown on a map, and it was emphasized that expropriation is necessary to complete the road. Despite the increased cost, alternative solutions such as tunnels were considered in order to safeguard the well-being of the local community.	Participants raised concerns about environmental and agricultural risks and acknowledged the consideration of alternatives such as tunnels. These aspects are addressed in the Land Use and Property section and the Project Description chapter.
	It was stated that the road would divide the village by passing through its center, and a request was made to shift the route 200–300 meters northward (towards the forest).	It was explained that the requested area falls within a wildlife conservation zone and therefore cannot be used.	Route modification options are addressed in the Analysis of Alternatives section, with conservation considerations further discussed in the Protected Areas and Cultural Heritage chapters.
	Participants cited tunnels used in other villages and requested a similar tunnel for their own. They also expressed concerns about an inappropriate route selection for expropriation purposes.	Three participants submitted written statements (recorded in the minutes). No response was provided.	Tunnel requests were raised by the community. Relevant design adjustments are considered in the Project Description and Analysis of Alternatives sections.
Manavgat Chamber of Commerce and Industry – Assembly Hall / 07.04.2016 – 15:00	Negative environmental, agricultural, and tourism impacts were expressed.	It was stated that mitigation measures would be taken during construction, and that during the operation phase, the project would contribute positively to the transportation of agricultural products and increase tourism circulation.	The ESIA comprehensively assesses potential impacts during both construction and operation phases. Specific mitigation measures have been developed accordingly. Additionally, the potential benefits of the Project are also evaluated within the ESIA.
	Negative feedback regarding the project route was shared (e.g., adverse impacts, expropriation issues).	Responses were provided, and it was mentioned that the route could be revised in coordination with relevant authorities, depending on stakeholder feedback.	Route modifications are considered in the Analysis of Alternatives section, based on stakeholder requests and in coordination with relevant authorities.
	Questions were raised regarding potential negative impacts on settlements and the mitigation measures to be taken.	It was explained that measures such as road watering to prevent dust, covering truck trailers, and installing noise barriers would be implemented.	Project routes are defined in the Project Description section of the ESIA, and potential impacts during construction and operation in these locations are addressed in detail throughout the report. Specific mitigation

Location – Date – Time	Question, Comment, or Suggestion	Response	Main Discussion Points & Feedback Summary
			measures are developed in Chapter 15: Community Health and Safety.

During the Public Consultation Meetings (PCMs), the majority of questions, comments, and complaints were related to the proposed route of the Project. Local stakeholders expressed concerns about the potential impacts of land acquisition activities along the route, particularly regarding their effects on the agriculture and tourism sectors. Accordingly, a significant portion of the complaints received from local residents focused on the loss of agricultural lands and restricted access to tourism facilities.

In the meetings held in and around Manavgat, tourism-related questions predominated, as the proposed Project route passes near touristic areas. Participants frequently requested revisions to the route and raised concerns about the expropriation process. In response, representatives of the relevant authorities emphasized that all procedures will be carried out in compliance with the Expropriation Law No. 2942, ensuring full adherence to national legal frameworks.

Topics such as archaeological sites and protected cultural heritage areas were mentioned less frequently. However, for the questions raised on these matters, project officials clarified that appropriate mitigation measures will be implemented, and coordination with relevant heritage protection authorities will be ensured throughout the project lifecycle.

In June 2024, ENCON conducted a comprehensive four-day field study aimed at gathering qualitative data from a wide range of stakeholders across various regions in Antalya province. The study included interviews and focus group discussions with academics, local authorities, and community members, targeting diverse demographic and occupational groups. The detailed breakdown of the activities conducted during the field study is presented in Table III.3. The feedback received during the interviews and how they were responded to is presented in Table III.4.

Table III-3. Summary of Field Study Activities Conducted by Encon in June 2024

No	Work Items	Locations
1. Day		
1	Academician Interview	Akdeniz University/Faculty of Agriculture
2	Academician Interview	Akdeniz University / Faculty of Tourism and Biology
2. Day		
3	Official Institution Interview	Serik District Governor
4	NGO Interview	Head of Serik Chamber of Tradesmen and Craftsmen
5	Key Informant Interview	Serik/ Mukhtar of Merkez Neighborhood
6	Focus Group Interview	Serik / Merkez Neighborhood
7	Focus Group Interview	Manavgat/Taşağıl Neighborhood
8	Vulnerable Group (Elderly) Interview	Manavgat/ Taşağıl Neighborhood
3. Day		
9	Focus Group Interview	Manavgat/Kalemli Neighborhood
10	Vulnerable Group (Women) Interview	Manavgat/Kalemli Neighborhood
11	Focus Group Interview	Manavgat/Ulukapı Neighborhood

No	Work Items	Locations
12	Vulnerable Group (Women) Interview	Manavgat/Ulukapı Neighborhood
13	Key Informant Interview	Manavgat/ Mukhtar of Ulukapı Neighborhood
14	NGO Interview	Manavgat Head of the Chamber of Agriculture
15	Official Institution Interview	Manavgat Directorate of Technical Affairs
16	Focus Group Interview	Manavgat/Haciisalı Neighborhood
17	Vulnerable Group (Elderly) Interview	Manavgat/Haciisalı Neighborhood - Ayrancılar
4. Day		
18	Key Informant Interview	Manavgat/ Mukhtar of Karakaya Neighborhood
19	Focus Group Interview	Manavgat/ Mukhtar of Karakaya Neighborhood
		Alanya/ Mukhtar of Çakallar Neighborhood
		Alanya/ Alara Neighborhood Household
20	Focus Group Interview	Alanya/Akdam Neighborhood
21	Focus Group Interview	Alanya/Toslak Neighborhood
		Alanya/Konaklı Neighborhood
		Alanya/Alara Neighborhood
		Mukhtars and Households
22	Key Informant Interview	Alanya/ Mukhtar of Toslak Neighborhood

Table III-4. Summary of Field Study Interview Conducted by Encon in June

Interview Type and Location	Summary of the Interview	Main Discussion Topics and Responses
Akdeniz University / Faculty of Agriculture – Academic Interview	Emphasis was placed on the protection of agricultural lands, prevention of zoning pressure, and continued support for small-scale producers. Protection of underground water resources was also requested.	Agricultural lands will be preserved, and monitoring and preventive measures for water resources will be implemented to support farmers' activities.
Akdeniz University / Faculty of Tourism and Biology – Academic Interview	Recommendations included preventing fragmentation of natural habitats, using local plant species (olive, carob) in medians, and declaring the Alarahan area a nature park.	The route was planned to avoid habitat fragmentation. Local species will be used in landscaping, and coordination with relevant institutions will be ensured.
Serik District Governorate – Official Institution Interview	The project is viewed positively; however, it was requested that construction not coincide with tourism and agricultural seasons.	Efforts will be made to ensure that construction activities do not overlap with peak tourism and harvest periods.
Serik Chamber of Tradesmen and Craftsmen – NGO Interview	The road is expected to benefit tradespeople and farmers; it was requested that rest areas be designed to support commercial activities.	Rest facilities will be made accessible to local producers and tradespeople to support commercial activities.
Serik / Merkez Neighborhood – Mukhtar Interview and Focus Group	Requests included ensuring road access to villages, controlling dust/noise, and increasing information dissemination.	Noise and air quality control measures will be implemented and monitored. Village access will be maintained with planned connection roads. An inclusive grievance mechanism has also been developed.

Interview Type and Location	Summary of the Interview	Main Discussion Topics and Responses
Manavgat / Taşağıl Neighborhood – Focus Group and Elderly Group	Elderly individuals face challenges accessing information; it was suggested to use audio announcements.	Information access for the elderly will be provided through public announcements in spaces such as mosques and mukhtar offices.
Manavgat / Kalemler Neighborhood – Focus Group and Women Group	The road's positive contribution to health and agricultural access was noted; women expressed social support needs.	Social support requests specific to women will be considered.
Manavgat / Ulukapı Neighborhood – Focus Group, Women Group, Mukhtar	Requested the preservation of field roads and uninterrupted access during construction.	Field roads and connections between settlements will be maintained with underpasses and overpasses ensuring uninterrupted access.
Manavgat Chamber of Agriculture – NGO Interview	Support for producers and participation in decision-making processes were requested.	Regular coordination and information meetings will be held with producer unions.
Manavgat Directorate of Technical Affairs – Official Institution Interview	Requested compatibility with urban planning and integration with public infrastructure.	Planning will be coordinated with municipalities, and infrastructure transitions will be integrated into the project.
Manavgat / Hacısali Neighborhood – Focus Group and Elderly Group	Requested reduction of social isolation and safe crossings.	Safe pedestrian crossings and transport services will be provided.
Manavgat / Karakaya Neighborhood – Mukhtar and Focus Group Interview	Suggested preventing the village from being divided and constructing tunnels/underpasses.	Underpasses and bridges will be evaluated for critical crossing areas.
Alanya / Akdam, Toslak, Konaklı, Alara – Focus Group and Mukhtars	Requested support for loss of agricultural land, routing away from residential areas, and eco-tourism-oriented rest areas.	Support will be provided to affected producers and alternative route scenarios have been evaluated. Eco-tourism-focused designs will be considered for rest areas.

The EIA Review and Evaluation Commission set up by the MoEUCC; General Directorate of EIA, Permit and Inspection at the scoping stage of the national EIA processes included the governmental stakeholders listed in Table III.5 .

Table III-5. Governmental Stakeholders Involved in the Scoping, Review and Evaluation of the National EIA Process

Organization	Directorate/ Administration
General Directorate of Highways	General Directorate of Highways 13th Regional Directorate
Governorship of Antalya	Investment Monitoring And Coordination Department Antalya Governorship Repealed Provincial Directorate of Agriculture Antalya Governorship Provincial Directorate of National Education
Antalya Metropolitan Municipality	Department of Housing and Urbanization Department of Real Estate and Expropriation
Ministry of Transport and Infrastructure	Antalya Airport Chief Directorate
General Directorate of Mineral and Research and Exploration	General Directorate of Mining Affairs, Exploration Department
Ministry Of Agriculture And Forestry	General Directorate of State Hydraulic Works Department of Survey, Planning and Allocations Directorate General of Agricultural Reform General Directorate of Nature Conservation and National Parks General Directorate of Forestry Department of Permits and Easements
Ministry of Forestry And Water Affairs	Repealed Ministry of Forestry and Water Affairs 6th Regional Directorate Antalya Branch Directorate
Repealed Electricity Generation-Transmission Inc. (TEAŞ)	General Directorate of Electricity Generation Corporation
Ministry of Culture and Tourism	Directorate General of Investments and Enterprises Regional Board of Protection of Cultural Heritage
Ministry of Environment, Urbanization and Climate Change	General Directorate of Conservation of Natural Assets Provincial Directorate of Environment, Urbanization and Climate Change
Ministry of Interior	Provincial Directorate of Disaster and Emergency
Ministry of National Defense	General Directorate of Machinery and Chemical Industry Corporation
Ministry Of Industry And Technology	Directorate General for Industrial Zones

The EIA Application File was prepared on behalf of General Directorate of Highways and submitted to the Ministry of Environment and Urbanization by the e-EIA system on 04.03.2016, and the EIA process was initiated. During the preparation of the Project's EIA Report, the comments and opinions expressed by the local communities during the Public Participation Meeting, and the official views of the governmental stakeholders that formed the EIA Review and Evaluation Commission, were incorporated. Following the finalization of the report, the EIA was disclosed to the public via the MoEUCC and the Provincial Directorate of the Environment, Urbanization and Climate Change as per the requirements of the national EIA Regulation.

III.2. Stakeholder Engagement as part of the ESIA Process

The expert team in Encon held two separate field studies as part of the ESIA study, as summarized in Table III.6. The first one was a reconnaissance study carried out on May 2-3, 2024 with the main objective of identifying the environmental and social features and sensitivities of the Project. This included planned art structures along the motorway route, campsites, quarries, and facilities such as the concrete plant, asphalt, and mechanical plan.

The second field study, conducted on 3-6 June 2024, focused on key informant, focus group, vulnerable groups, and other stakeholders (NGOs, Academicians, Communities, etc., in the region) interviews. During the social field study, key informative interviews were conducted with the mukhtars of four (4) settlements previously determined. Focus group interviews were held in eight (8) settlements, including mukhtars and households of 12 neighborhoods in the impact areas. Focus group interviews in Serik Merkez, Taşağıl, Kalemler, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara neighborhoods; and vulnerable group interviews were conducted in those areas. Additionally, other stakeholders such as academics, local officials, and local communities were interviewed to gather expert opinions on the socio-economic impacts of the Project.

Table III-6. Summary of the Social Field Studies Conducted as part of the ESIA

Tasks	Date of the Field Study	Scope of the Field Study
Site visit	May 2024	<ul style="list-style-type: none"> The reconnaissance study started at Km: 52+000, and ended at Km: 135+000 Visiting the license area: planned tunnel, viaduct, quarry, facility area, and construction site and storage area.
Key Informant Interviews Focus Group Interviews, Other Stakeholder Meetings	June 2024	<ul style="list-style-type: none"> Four (4) key informant interviews in Serik/Merkez, Manavgat/Ulukapı, Manavgat/Karakaya, and Alanya/Toslak neighborhoods Eight (8) Focus group interviews in Serik Merkez, Taşağıl, Kalemler, Ulukapı, Hacısalı, Karakaya-Çakallar-Alara, Akdam, and Toslak-Konaklı-Alara Interviews with Academics, local officials, and local communities
Road Trip Study Public Consultation Meetings (PCMs)*	August 2025	<ul style="list-style-type: none"> Informing the local community about the Project and collecting feedback from stakeholders, including complaints, suggestions, and opinions.

*Shuttle vehicles were arranged for appropriate residential areas in order to facilitate access to the Public Participation Meetings and to increase attendance rates.

In parallel to the ESIA studies, the Company has started to establish close relationships. In this scope, Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. participate the reconnaissance study in the project area May, 2024.

A Stakeholder/Public Consultation Meeting (PCM) had been organized after the finalization of the expropriation plan by the General Directorate of Highways (KGM). During the meeting, details about the project, its potential environmental and social impacts/risks, mitigation measures to be taken, and implementation/ monitoring/reporting responsibilities of different parties had been shared with the stakeholders; and then their opinions and suggestions received during the question-answer (Q&A) session are recorded and included in Table III.9.

III.2.1. Road Trip

In December 2024, Public Consultation Meetings (PCMs) was planned to be held in the four most affected locations related to the "Road Trip" study. However, due to delays in the completion of expropriation procedures, these meetings had been postponed and were organized once sufficient progress has been made. These meetings aimed to disclose Project impacts and planned mitigation measures, while creating a space for meaningful public feedback prior to the commencement of construction.

For the Project, four Public Consultation Meetings (PCMs) were held in selected locations: Orta (Serik, Antalya), Yukarıpazarıcı (Manavgat, Antalya), Avsallar (Alanya, Antalya), and Konaklı (Alanya, Antalya). Venues within local neighborhoods, which possess adequate capacity and appropriate physical conditions, were used for these meetings. This preference was based on the observation that participation levels are generally higher in such local venues, according to past experiences. Moreover, selecting the exact place/location were considered to create a more inclusive environment that enables women and vulnerable groups to participate. Figure III.1 and Figure III.2 shows the locations of the conducted PCMs and those that social field study was conducted.

To ensure broad awareness and community participation, announcements regarding the PCMs were made through multiple channels, including: public bulletin boards in central neighborhood locations, local mukhtars' offices, municipality websites, and local radio broadcasts where feasible. Additionally, printed invitations and visual materials such as posters and leaflets will be distributed, and mobile messaging applications (e.g., WhatsApp groups commonly used in local communities) may also be utilized to reach wider audiences. In addition to those the announcement at the national newspaper will also be done. All announcements will be made at least two weeks prior to the meetings and will be provided in Turkish, with Arabic translations where needed to ensure inclusivity for refugee or migrant populations.

PCMs took place along the entire Motorway route from the Serik district to the Alanya district of Antalya province. Table III.8 displays details about the planning of PCMs. The meeting locations were selected based on findings from key informant and focus group interviews conducted in the region by a social expert employed in ENCON. The overall motorway route spans 117.8 km, including the main carriageway and the access roads. Since it would not be possible to organize a meeting in every settlement that is located within the study area, in the selection of the settlements at which the public consultation meetings were planned, it was aimed that a meeting location is determined every 30 (plus minus) km along the Motorway route to ensure to the extent possible that the meeting location was accessible for the local people from the surrounding settlements and in order to acquire a more inclusive Road Trip for all different stakeholders.

The meetings were held with the participation of representatives of Limak as Project Sponsors (senior officials and technical Project team members including design and expropriation), authorities from the 13th Regional Directorate of KGM, and the Environmental and Social Impact Assessment (ESIA) Consultant (ENCON Environmental Consultancy Co.).

The ESIA Consultant moderated the meetings. The meetings commenced with an introduction and an explanation of the meeting's purpose and scope. This was followed by a presentation from the ESIA consultant and a final discussion session to address any questions, concerns, and suggestions. The main topics covered in the presentations were as follows:

- What is the Antalya-Alanya Motorway Project?
- Who are the project sponsor and ESIA Consultant?
- What are roles of the Project Sponsor and ESIA Consultant?
- What are the Anticipated Benefits of the Project?
- What is the Environmental and Social Impact Assessment Process?
- Stakeholder Engagement: How to Participate in the Process?
- Discussion (Questions and Answers) Session

Large-scale (in A0 format) maps showing the relevant part of the route in each meeting were posted on the walls of the meeting venue. In addition, project information brochures (see ANNEX-4) was shared the participants. Different parties participated, including government officials or (significantly) from adjacent neighborhoods.

Table III.7 shows the expected local representatives of participant profile in planned PCMs. A list of participants will be maintained at the meeting.

Table III-7. Summary of Participants Profiles

PCM No	Meeting Location	Adjacent Neighborhoods from which Representatives (Mukhtar or Local People) will Participated in the Meeting
1	Serik / Merkez	Cumalı, Burmahancı, Deniztepesi, Kayaburnu, Çandır, Üründü, Aşağıkocayatak, Yukarıkocayatak, Sariabalı, Aşağıçatma, Dikmen and Belpınarı neighbourhoods
2	Manavgat / Merkez	Çakış, Taşağıl, Gündoğdu, Hocalar, Yavrudoğan, Çolaklı, Seki, Kalemler, Evren, Ilica, Yeniköy, Şişeler, Evrenleryahşi, Dolbazlar, Yukarıışıklar, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacıisalı, Hacıoğlu, Kızılot, Uzunlar, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya neighborhoods
3	Alanya / Avsallar	Avsallar, Akdam, İncekum, Alara, and Çakallar neighbourhoods
4	Alanya / Konaklı	Türkler, Emişbeleni, Toslak, Konaklı, Elikesik, Payallar neighbourhoods

Table III-8. Organizational Details of the Planning Public Consultation Meetings in Antalya

PCM No	Province	District	Neighborhood	Km Chain age	Population (TURKSTAT, 2024)	Date of the Meeting	Time of the Meeting	Meeting Venue	Number of Participants
1	Antalya	Serik	Merkez	Km 52+000 (Access Road)	17,969	27.08.2025	09.00 - 12.00	Serik Multipurpose Cultural Hall	80-
2	Antalya	Manavgat	Merkez	Km 87+000	6,374	27.08.2025	15.00 - 18.00	Manavgat İbrahim Sözen Youth Center	187-
3	Antalya	Alanya	Avsallar	Km 125+000	16,118	26.08.2025	09.00 - 12.00	Avsallar Kör Ali Baysal Wedding Hall	200-
4	Antalya	Alanya	Konaklı	Km 141+000	17,927	26.08.2025	15.00 - 18.00	Alanya Municipality Konaklı Cultural Center	300-

**To facilitate access to the Public Participation Meetings and to increase attendance rates, shuttle vehicles were arranged for the eligible residential areas specified in Table III.7*



Figure III-I Locations of Conducted Social Field Study



Figure III-II Locations of Conducted Public Consultation Meeting

III.2.2. Field Study with Women

As part of the Project, Community Liaison Officers (CLOs) conducted a series of focus group discussions specifically with women in different districts and villages located along the Project corridor. These meetings were held between late July and late August 2025, covering Serik, Manavgat, and Alanya districts. The purpose of the discussions was to collect women’s perspectives, identify their specific concerns, and ensure that their voices are incorporated into the Project’s social assessment and engagement process. The record list of the meetings is presented in Table III.9

Table III-9. Focus Interviews Conducted by CLOs

No	Date	District	Village Neighborhood	Facilitator	Meeting Status
1	7/28/2025	Serik	Sarıbalı	CLOs	Held
2	8/23/2025	Serik	Cumalı	CLOs CLOs	Held
3	8/24/2025	Serik	Üründü	CLOs	Held
5	8/24/2025	Manavgat	Taşağıl	CLOs	Held
6	8/22/2025	Manavgat	Yukarıışıklar	CLOs	Held
7	8/23/2025	Manavgat	Bucağşeyhler	CLOs	Held
8	8/24/2025	Manavgat	Ulukapı (Araplar Street)	CLOs CLOs CLOs	Held
			Ulukapı (Isparta Street)		
			Ulukapı (Alibazlı Street)		
9	8/23/2025	Alanya	Konaklı	CLOs CLOs	Held
10	8/23/2025	Alanya	Türkler	CLOs	Held
11	8/24/2025	Alanya	Avsallar	CLOs	Held

Each session was facilitated by a designated CLOs and provided an opportunity for women community members to share their expectations, highlight potential gender-related impacts, and discuss measures to address them. The outcomes of these meetings will serve as an important input for shaping the Project’s Stakeholder Engagement Plan and informing mitigation strategies that are responsive to women’s needs and priorities.

III.2.3. Public Consultation Meetings Summary

A detailed review of the PCMs held on August 26-27 as part of the project's ESIA process is presented below. Figure III.3 shows the shuttle vehicle arranged to facilitate access to the PCM and used participation list form. The neighborhoods designated as shuttle points are listed under the meeting locations with transportation demand.



Figure III-III Shuttle for PCM

Avsallar

The Public Consultation Meeting was held on August 26, between 9 and 11 a.m., at the Kör Ali Baysal Avsallar Wedding Hall. To facilitate access to the PCM and to increase attendance rates, shuttle vehicles were arranged for the Alara, Akdam, Çakallar and Türkler. The headmans of Akdam and Çakallar stated that the residents would provide transportation using their own resources. A total of 200 people attended the meeting, 34 of whom were women. It was observed that the majority of participants were between the ages of 35 and 64. It was also noted that 4-5 participants were aged 75+, and one physically disabled individual was present at the meeting. Before the meeting began, conversations were held with participants who had contacted, and their concerns were listened to. The project presentation began at 10 a.m. after which complaints, questions, and opinions were received. While the village heads and participants expressed their complaints, tensions arose among the participants from time to time. While a group of questions were being answered by project officials, the participants expressed their reactions by protesting the meeting, and as a result, the meeting could not be completed.

Figure III.4 shows the venue where the meeting took place, the layout of the meeting room, the project route maps hung on the walls for informational purposes, and the presentation made during the meeting. Figure II I.5 shows the informational brochures (see ANNEX-4). These include the Project information

brochures distributed during the meetings and the informational brochures created regarding expropriation.

At the Avsallar - Kör Ali Baysal Wedding Hall, during part of the meeting and in the pre-meeting discussions, the main requests included shifting the route over the Alara River or constructing a tunnel through the forest corridor. Participants also emphasized the need to protect agricultural lands and to avoid adverse impacts on parks, greenhouses, irrigation canals, and residential houses. In addition, greater transparency was requested regarding information on quarries and their permitting processes. On the other hand, the main concerns expressed were the increase in the number of houses affected due to the route change, grievances caused by the quarries, inappropriate working hours, and the risk posed to drinking water sources resulting from drillings. Concerns were also raised that expropriation compensation amounts would be too low. Prior to the meeting, the Expropriation Director provided information about the legal procedures, while ENCON Environmental Consultancy explained the compensation mechanisms foreseen within the RAP framework. The participants' Q&A table is presented in Table III.9.



Figure III-IV PCM in Avsallar



Figure III-V The Informational Brochures in PCM

Konaklı

The Public Consultation meeting was held on August 26, between 3 and 6 p.m., at the Alanya Municipality Konaklı Cultural Center. The local headmen and residents stated that they would arrange their own transportation for the meeting held here. A total of 300 people attended the meeting, 26 of whom were women. Since the meeting in Avsallar could not be completed, some participants attended the meeting in Konaklı.

Figure III.6 shows the venue where the meeting took place, the layout of the meeting room, the project route maps hung on the walls for informational purposes, and the presentation made during the meeting. Figure III.7 shows the informational brochures.

At the meeting held at the Alanya Municipality Konaklı Culture Center, the main requests included ensuring the continuity of the Konaklı–Alanya road, extending the road to Gazipaşa, and improving the design of the Konaklı junction. Tunnel and alternative crossing options were also suggested in order to prevent damage to agricultural lands. Complaints were mainly focused on the Konaklı junction dividing the neighborhood into two, the connection road design increasing traffic load, uncertainties regarding expropriation compensations and procedures, and concerns about 2B lands. In addition, the negative impacts of the Project on agricultural production and livelihoods were emphasized. Questions from participants regarding parcel and compensation information were answered by the AAOİAŞ Expropriation Director, while social impacts and measures under the RAP were explained by ENCON Environmental Consultancy and the AAOİAŞ Environment and Social Manager. CLOs conducted interview with local stakeholders prior to the session and also collected the contact information of participants who raised sensitivities during the meeting. The participants' Q&A Table is presented in Table III.9.

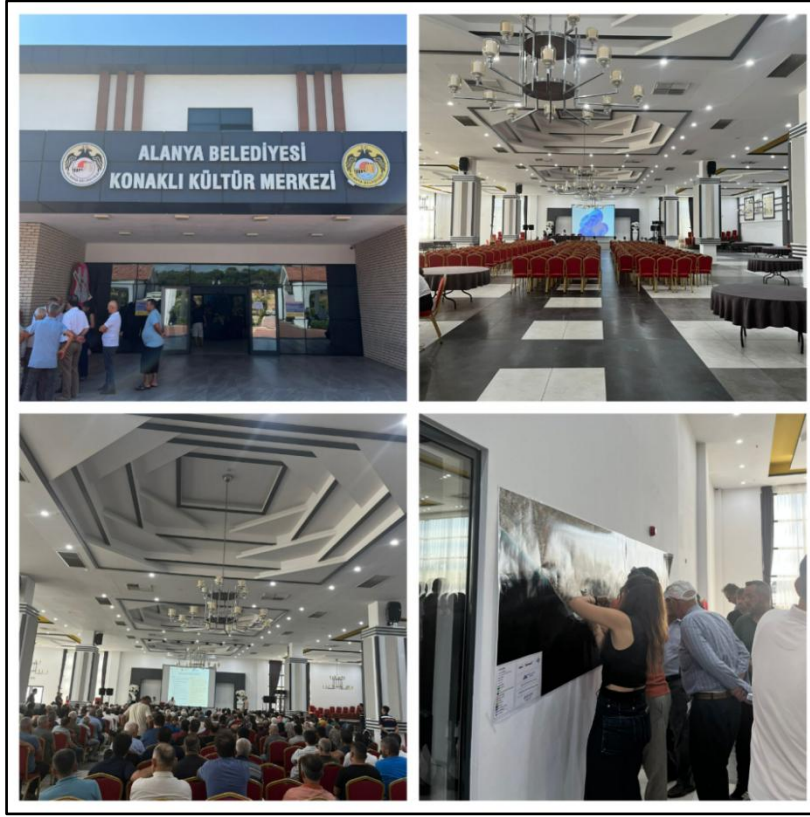


Figure III-VI PCM in Konaklı



Figure III-VII The Informational Brochures in PCM

Serik / Orta Neighborhood

The Public Consultation meeting was held on August 27, between 9 and 12 a.m., at the Antalya Metropolitan Municipality Multi-purpose Cultural Hall. The mukhtars and residents stated that they would arrange their own transportation for the meeting held here. A total of 80 people attended the meeting, 15 of whom were women.

At the meeting held at the Serik Multipurpose Cultural Center, the most frequently raised requests included a route change to protect the cemetery, the widening of the culvert under the D400 road, and ensuring access to greenhouses and houses through underpasses and connection roads.

The main complaints focused on the low level of expropriation compensations, the loss of value of payments due to inflation, the loss of fertile agricultural lands, and the risks faced by greenhouses built through loans. In addition, the absence of representatives from the General Directorate of Highways (KGM) was criticized. Questions related to the cemetery were addressed by AAOİAŞ representatives, who provided explanations on technical reasons and the inspections to be carried out. Details regarding expropriation compensations and legal procedures were provided by the Expropriation Director, while social impacts and livelihood losses were evaluated by the AAOİAŞ Environment and Social Manager. CLOs collected the addresses and contact numbers of households they had engaged with prior to the meeting as well as those who expressed sensitivities during the session.

The participants' Q&A Table is presented in Table III.9, while the meeting photos are presented in Figure III.8.



Figure III-VIII PCM in Serik / Orta Neighborhood

Manavgat / Yukarı Pazarcı Neighborhood

The Public Consultation meeting was held on August 27, between 3 and 6 p.m., at the Ibrahim Sözen Youth Center. To facilitate access to the PCM and to increase attendance rates, shuttle vehicles were arranged for the Yavrudoğan, Yeniköy, Dolbazlar, Karaöz, Hacıobası and Karakaya. A total of 187 people attended the meeting, 39 of whom were women.

At the meeting held at the Manavgat Ibrahim Sözen Youth Center, the main complaints included uncertainties regarding expropriation negotiations and the payment schedule, issues related to fragmented parcels, risks of dust and asbestos as well as negative impacts from blasting, the risk of yield loss in olive trees, and the absence of representatives from the General Directorate of Highways (KGM). Questions concerning parcels and inherited properties were addressed by the AAOİAŞ Expropriation Director, while issues related to livelihood losses and vulnerable groups were answered by ENCON Environmental Consultancy and the AAOİAŞ Environment and Social Manager. Prior to the meeting, CLOs carried out information activities, and during the meeting, the addresses and contact details of participants who expressed sensitivities were collected in order to plan further engagements. The participants' Q&A Table is presented in Table III.9, while the meeting photos are presented in Figure III.9.



Figure III-IX PCM in Manavgat / Yukarı Pazarcı Neighborhood

Figure III-X Questions, Opinions, and Suggestions Submitted During the Public Consultation Meeting

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
<p>Avsallar Kör Ali Baysal Wedding Hall / 26.08.2025 09:00-11.00</p>	Headman of Akdam Neighborhood	It was emphasized that the Project would have negative impacts on agriculture and that both the local community and individuals would suffer losses.	<p>A few questions, requests, and opinions were received first. Afterwards, while a representative from the General Directorate of Highways (KGM) was responding on behalf of the Project Officials, the meeting was interrupted and ended prematurely.</p>	
	Resident	It was noted that the number of houses affected by the route change increased from 5 to 40, and a request was made to shift the route over the Alara River. It was also stated that parks, greenhouses, irrigation canals, and houses would be affected by the route.		
	Headman of Çakallar Neighborhood	It was stated that no prior notification had been provided regarding construction works, and that permission would not be granted once construction reached the village. A request was made for the Project route to pass through the forest instead of the settlement, including the construction of a tunnel if necessary. Objections to the quarries and the current route were reiterated, which were supported by applause from the community. Concerns were also expressed that the Project would not create employment, that people whose livelihoods depend on agriculture would lose their income sources, and that they would only be employed as cleaning staff.		
	Resident	It was stated that the local community did not want expropriations to be carried out. The procedures and legal processes related to expropriation were shared. It was also expressed that participants believed the compensation		

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
Alanya Municipality Konaklı Culture Center / 26.08.2025 15:00-18.00	Headman of Saburlar Neighborhood	<p>amounts for expropriation would be low.</p> <p>It was stated that the motorway and quarries caused serious grievances and that the working hours were inappropriate. Questions were raised about whether EIA reports had been obtained for the quarries and who had granted the approvals. Concerns were expressed about the muddy water resulting from the drillings, noting that the Saburlar Quarry is located 200 meters upstream of the water source. It was further stated that a complaint petition had been submitted to the General Directorate of Highways (KGM) regarding this issue, but no action had been taken.</p>		
	Resident	<p>It was stated that there is a need for a road and that no alternative route exists, which causes heavy traffic. A request was made for the continuation of the Konaklı-Alanya road, noting that there is no entrance to Alanya after Konaklı.</p>		
	Resident in Toslak Neighborhood	<p>It was asked why the Project route had recently been changed and what the justification for this change was.</p>	Representative of AAOİAŞ	Minor changes were made at the D-400 connection section in order to ease traffic.
	CHP District Chairman	<p>It was stated that while the road is needed, it should not be constructed in its current form. The route passes through agricultural lands in Alarahan and Toslak, which constitute the livelihood of local people. It was requested that the complaints be taken into consideration, emphasizing that the destruction of agricultural lands would have significant impacts on climate and water scarcity. It</p>	Representative of ENCON	<p>It was explained that in line with international standards, different solutions for expropriation activities and the associated costs are also being taken into account.</p>

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		was also noted that it currently takes one hour to travel 15 km, but congestion will still occur with the proposed connection roads.		
	Mayor of Konaklı (2014–2019)	It was stated that if the road is planned to be extended up to Gazipaşa, then the connection road in Konaklı (behind the New Hospital) should be cancelled. A concern was raised about whether it would first be constructed and then cancelled, emphasizing that people are already being adversely affected by the Konaklı connection road.	Representative of ENCON and AAOİAŞ	Reference was made to the Erdemli–Kızkalesi Project, where an extension was carried out as described. It was further explained that in addition to the motorway, certain connections are also included in the General Directorate of Highways' plans and will likely be expanded.
	Resident	Questions were raised regarding when the construction will take place and when it will be completed. Concerns were expressed about ongoing agricultural activities and related expenses (e.g., irrigation costs of 11,000 TL) as well as newly built structures (houses and buildings), and whether they would be demolished and compensated if affected.	Representative of AAOİAŞ	It was explained that initial assessments are being carried out, with inspections conducted by the General Directorate of Highways (KGM). The value of the land is determined based on the 2019 Expropriation Plan, taking into account unit costs and tax calculations. If any errors are identified during the assessments, these will be corrected. Notifications will be issued starting from March. Those seeking earlier information were advised to contact KGM directly. It was also stated that prices offered do not have to be accepted, and that lawsuits can be filed under Articles 27 and 10. Article 27 corresponds to an approximately two-month process, while Article 10 (Action for Price Determination and Registration) may take longer.
	Young Farmer Mustafa	A request was made for the service to be carried out properly, rejecting the route passing through fertile lands. It was stated that this is a wrong decision in the midst of a food crisis. It was	Representative of ENCON	It was stated that the concerns will be duly considered.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		further noted that ending the route in Konaklı would not solve the traffic problem, and that if the road is constructed in its current form, outward migration and unemployment will increase.		
	Resident	It was stated that the area is not well known, and that traffic congestion occurs between Okurcular and Alanya. It was suggested that the Emiřbeleni–Gazipařa Tunnel Project should be implemented.	Representative of AAOİAŐ	It was stated that the concerns will be duly considered.
	Farmer, Resident	It was questioned whether this meeting would have been more effective if it had been held before the route was determined, and whether complaints would be taken seriously after the route has already been set.	Representative of ENCON	Complaints and requests will be taken into consideration to improve mitigation measures and the RAP. The necessary revisions and updates will continue to be implemented.
	Lawyer, Resident of Emiřbeleni	It was stated that the Konaklı junction passes through the neighborhood, leading to the loss of greenhouses and damaging the efforts invested. It was questioned whether there is any land of equal value, emphasizing that the Project harms farmers.	Representative of ENCON	A RAP is being prepared within the scope of the Project, and losses will be compensated in line with international practices.
	Headman of Konaklı Neighborhood	It was stated that the approved Project route, particularly the junction on the Konaklı side, would negatively affect community life and divide the settlement into two.	Representative of AAOİAŐ	The settlement pattern is taken into account in the Project design, and necessary adjustments will be reviewed to minimize potential social impacts of the route.
Concerns were raised that vehicles coming from the Alanya direction would increase the existing traffic load when connecting to the main route through the connection road due to the current design.		Representative of AAOİAŐ	Traffic impact analyses are being carried out, and measures to reduce traffic congestion will be considered in the junction designs.	
A request was made for the improvement of the junction design for these reasons.		Representative of AAOİAŐ	The matter will be re-evaluated with the relevant engineering design team, and appropriate technical	

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
				solutions will be explored.
		An objection was expressed to the approved design, and an alternative route was requested.	Representative of AAOİAŞ	The approved route has been determined in line with national plans. However, the requests communicated will be recorded and forwarded to the relevant authorities.
		Questions were raised regarding the recent change in the Project route and the justification for this change.	Representative of AAOİAŞ	Route changes have been made by considering technical requirements and issues such as traffic safety.
		The possibility of further changes to the approved route was brought up.	Representative of AAOİAŞ	The Project route has been approved by the relevant authorities, and no substantial changes are foreseen.
		It was noted that the previous markings were more functional compared to the current design, and that the subsequent changes were negatively received.	Representative of ENCON	All markings and signages are implemented in compliance with national standards, and feedback received during implementation will be taken into account.
		It was emphasized that if improvements are made to the route, the community would show satisfaction, otherwise the reactions would continue.	Representative of ENCON	Stakeholder views will be regularly collected, and possible improvements will be made. The aim is to ensure community satisfaction.
		Participants expressed their discontent regarding the absence of representatives from the General Directorate of Highways (KGM) at the meeting.	Representative of AAOİAŞ	Participants' views in this regard have been recorded, and necessary steps will be taken to ensure the participation of the relevant authority representatives in future meetings.
	Resident in Emiřbeleni	The local community stated that they did not want expropriations to be carried out.	Representative of AAOİAŞ	Expropriation will be carried out in accordance with the relevant national legislation and legal procedures, and the necessary information is being provided.
	Resident in Emiřbeleni	Participants expressed their concern that the compensation amounts for expropriation would be low.	Representative of AAOİAŞ	Compensation amounts are determined through independent valuation studies, and participants were informed about the available legal appeal mechanisms.
	Resident in Akdam	The local community requested the implementation of the initial project design.	Representative of AAOİAŞ	The Project route has been updated considering technical requirements and traffic safety; however,

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
				the requests have been recorded and will be conveyed to the relevant authorities.
	Resident in Emiřbeleni	Participants expressed concern about the potential loss of fertile agricultural lands.	Representative of AAOİAŐ	While determining the route, efforts were made to preserve fertile agricultural lands as much as possible; potential losses will be addressed through compensation mechanisms under the RAP.
	Resident	Participants mentioned that there are 2B lands in the area and stated that they did not know how to claim their rights.	Representative of AAOİAŐ	Processes related to 2B lands are carried out in line with the existing national legislation, and the rights holders have been provided with the necessary information.
	Resident	It was asked whether a new EIA Report would be required for route changes, noting that the road is shifted by 2 meters after the EIA Report is obtained.	Representative of AAOİAŐ	It was explained that before the tender, limited drilling works are carried out for design purposes. However, once the contractor takes over after the tender, the design cannot be finalized. Further drilling works are then conducted, and if the ground conditions are found unsuitable, route changes may occur.
	Resident in Akdam	Concerns were raised that the operating authorities did not act with due consideration and that construction works continued despite the complaints.	Representative of AAOİAŐ	Before construction, the headmen are informed and the CLOs provide relevant information. The address has been obtained and will be communicated to the CLOs.
	Resident in Emiřbeleni	A question was raised regarding the possibility of reaching a settlement for the expropriation of the remaining portion of the land, as 73% has already been acquired.	Representative of AAOİAŐ	It was explained that a petition should be submitted for the expropriation of the remaining part. Depending on the assessment of the situation, the remaining portion may also be expropriated. For example, if access to the land is restricted, the petition would likely result in a favorable outcome.
	Resident in Konaklı	It was stated that the Konaklı junction has no benefit, and a request was made to return to the previous route. In addition, a	Representative of AAOİAŐ	The Konaklı junction and route designs have been prepared by taking into account traffic safety and transportation needs.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		request was made for the road to be extended to Gazipaşa. It was also suggested that Aksu should be connected to the Isparta road.		Returning to the previous route is not technically feasible. The requests for extending the road to Gazipaşa and for connecting Aksu to the Isparta road have been noted and will be considered within the planning framework of the relevant authorities.
Serik Multipurpose Cultural Center / 27.08.2025 09.00-12.00	Headman of Yukarıkocayatak	A request was made for a route change due to the Mektebirli Cemetery located on parcel no. 1101. It was stated that 14–15 graves would be affected under the current route.	Representative of AAOİAŞ	It was explained that cancellation of the route is not possible. Following the meeting, a site inspection will be carried out to clarify the exact number of affected graves, as the figure was initially thought to be lower. It was further explained that the proposed route change does not comply with motorway standards; therefore, the current design must be maintained. A separate meeting will be organized with the headman and the concerned parties to share technical details, including why a change cannot be made and how the existing procedures will be followed. Further contact with the headman will be established at the beginning of the week.
	Headman of Kayaburnu	It was stated that the existing culvert under the D400 road is insufficient and needs to be widened. It was noted that the culvert is used by three neighborhoods, currently barely meets the demand, and may pose an overflow risk during sudden rainfall. It was asked whether the culvert could be widened during the D400 road expansion works. It was also stated that a petition had been submitted to KGM regarding this issue.	Representative of AAOİAŞ	It was noted that the issue will be reviewed with the relevant technical teams.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
	Headman of Deniztepesi	Concerns were raised that expropriation payments are too low and will lose value due to inflation by the time they are paid. A request was also made for land consolidation.	Representative of AAOİAŞ	It was clarified that there is a misunderstanding, as prices will be updated in the new year and payments will be made based on 2026 rates. It was also explained that land consolidation will not be possible after this stage of the process.
	Resident	It was asked whether compensation would be paid for greenhouses and structures.	Representative of AAOİAŞ	It was explained that compensation will be paid for structures. In the case of jointly owned lands, agreements may be reached through negotiation, or the matter can proceed to court.
	Resident	The public requested a clear timeline for the payment of expropriation compensations.	Representative of AAOİAŞ	It was stated that compensation amounts will be determined and paid according to the applicable legal schedule, and affected landowners will be informed individually.
	Resident	Information was requested regarding the size of the parcels to be expropriated.	Representative of AAOİAŞ	It was explained that the total area along the route has been calculated and that landowners of the affected parcels will be provided with specific information.
	Resident	Participants expressed that the offered expropriation compensations are significantly below market value.	Representative of AAOİAŞ	It was clarified that the compensations are determined through independent valuation studies, and landowners retain the right to appeal through legal mechanisms.
	Resident	Concerns were raised about the absence of representatives from the General Directorate of Highways (KGM) at the meeting.	Representative of AAOİAŞ	It was noted that this feedback has been recorded and will be conveyed to the relevant authority to ensure future participation.
	Resident	It was asked how payments would be made in parcels with multiple heirs.	Representative of AAOİAŞ	It was explained that payments will be made in accordance with inheritance shares, as determined under applicable legislation.
	Resident	Citizens requested adequate underpasses, culverts, and connection roads to ensure access to houses and greenhouses.	Representative of AAOİAŞ	It was stated that existing culverts will be extended and widened where necessary to maintain access.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
	Resident	Concerns were raised that cemeteries should not be affected by the Project.	Representative of AAOİAŞ	It was noted that measures will be taken to avoid impacts on cemeteries as far as possible, and any unavoidable cases will follow due procedures.
	Resident	It was stated that some parcels, houses, and greenhouses will be adversely affected by expropriation.	Representative of AAOİAŞ	It was explained that these impacts are recognized, and compensations will be provided in line with national legislation and the RAP framework.
	Resident	Concerns were expressed that expropriation payments would be insufficient to purchase new land.	Representative of AAOİAŞ	It was explained that compensations are based on independent valuations and legal requirements; however, concerns have been noted for further consideration in the RAP.
	Resident	It was noted that some greenhouses were built through loans, leading to additional grievances.	Representative of AAOİAŞ	It was explained that such cases will be reviewed on an individual basis, and compensation procedures will take account of legally recognized investments.
	Resident	Concerns were raised that certain routes may damage cemeteries and drinking water resources.	Representative of AAOİAŞ	It was stated that the Project design aims to avoid such sensitive areas; in cases where impacts are unavoidable, mitigation measures will be implemented in line with environmental and social standards.
	Resident in Kayaburnu (Parcel: 39 / 102)	Owns a single land plot of 11.5 decares with no other property. Stated that citrus trees planted in 2013 (12–13 years old) will be entirely affected, estimating a loss of 600–700 trees. Highlighted that the land is adjacent to a zoned area, making it highly valuable, and that acquiring new land under these conditions is impossible. Mentioned an annual income of 1,500–2,000 TL and stated that the road will not provide any benefit to him.	Representative of AAOİAŞ	The valuation of trees and land will be carried out through independent expert assessments. The proximity of the land to zoned areas, its current use, and agricultural productivity will be taken into account. Lost income and livelihoods will be addressed under the RAP.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
	Resident in Burmahancı (Parcel: 102 / 88)	Raised concern that the KMZ is outdated at the location of the DSI canal and needs to be checked. Noted that in the Ministry of Environment's e-Plan, the zoning plan attached to the EIA report is updated, and the problem stems from the outdated report. Stated that there is already a DSI road where lands are being taken, and that the additional T-junction road is unnecessary. Referred to the DSI irrigation canal built in the 1970s.	Representative of AAOİAŞ	The DSI canal and existing roads will be reviewed by the technical teams. Discrepancies between the KMZ and the EIA plans will be checked, and the request regarding the additional connection road will be conveyed to the relevant authorities.
	Resident in Üründü	asked about the Project's start date. Stated that his greenhouse was divided and asked how water and electricity will be provided. Asked when he should stop agricultural activities, noting: "Should I plant or not?" Asked whether underpasses or culverts would be built since the route cuts through greenhouses and orange orchards. Asked how long before construction notification would be given.	Representative of AAOİAŞ	Notification will be given at least three months before construction begins.
		Asked whether there would be support for dismantling and transporting his greenhouse.	Representative of AAOİAŞ	Dismantling and transportation will be the responsibility of the landowner, but labor support may be provided.
	Resident in Cumalı (Parcel: 102 / 41)	Asked when the payments will be made and when construction will begin in their neighborhood.	Representative of AAOİAŞ	Expropriation payments and construction start dates will be determined in line with the official schedule, and landowners will be informed accordingly.
	Resident in Sarıbalı (Parcel: 249 / 5)	Stated that 10 households in the neighborhood are affected, 8 of which are in economic difficulty. Reported that 5 decars of his land will be lost, affecting his house and trees. Noted the presence of a tunnel passage on the route	Representative of AAOİAŞ	Yes, such a study is underway. Although the land is occupied, additional solutions are being explored.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		and asked whether there is a viaduct project to save his house.		
	Resident in Üründü (Parcel: 135 / 6-4)	Noted that they are 5 co-heirs and the land originally belonged to their grandfather. Stated that the house, greenhouse, and orange orchard (approx. 300 trees, 20 years old) will be affected. Explained that this orchard is his livelihood, generating 2 million TL annually, and that selling for 1 million TL is unacceptable. Emphasized that in 3 meetings held within 6 months, no clear information was provided about construction start dates or expropriation payments.	Representative of AAOİAŞ	Üründü is not included in this year's construction plan.
	Resident in Burmahancı (Parcel: 102 / 40)	Reported that their 15-decare greenhouse will be completely lost and that they are 3 co-owners. Stated that their house and sources of income will disappear and that they had not been directly consulted before.	Representative of AAOİAŞ	Valuations will be carried out for greenhouses and houses affected by expropriation, and individual consultations will be held with the landowners. Loss of income will be considered under the RAP.
	Resident in Burmahancı	Asked why fertile agricultural lands are not being preserved as in countries like Germany. Stated that the Project design was made without consulting the local people and emphasized that fertile soils should not be lost. Noted that the local people are not involved in tourism but rely entirely on agriculture.	Representative of AAOİAŞ	Efforts have been made to avoid fertile agricultural lands as much as possible when determining the route. Public consultation meetings are being held to collect stakeholder opinions, and feedback from these meetings will be communicated to the relevant authorities.
	Resident in Üründü (Parcel: 117 / 5)	Reported that the 130-meter greenhouse is cut in half by the route, leaving unusable land on both sides. Noted that they took a 7-year loan from Ziraat Bank in 2021 and payments are still ongoing. Stated that the land represents years of labor, and despite	Representative of AAOİAŞ	Investments made with loans and agricultural facilities will be taken into account during expropriation valuation. Compensation mechanisms under the RAP will be evaluated to prevent grievances for landowners.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		health challenges (platinum in arm), agricultural production continues, but the Project disregards their efforts.		
	Resident in Cumali	Noted that apart from their 5-decare land on the route (Cumali neighborhood, Antalya side), they have no other property. Previously, 10 decares had been requested for a hospital project (5 decares from a relative, 5 from themselves), but this project was later canceled due to the motorway. Requested that expropriation compensation reflect not only the land value but also the economic losses from the canceled hospital project. Ali Bey added that his wife is a cancer patient who has undergone chemotherapy.	Representative of AAOİAŞ	Expropriation compensation will be determined through independent expert assessments. Although losses arising from the cancellation of the hospital project cannot be considered under the official process, existing grievances will be assessed within the RAP framework. Social sensitivities have been conveyed to the project team.
Manavgat İbrahim Sözen Youth Center/ 27.08.2025 15.00-18.00	Resident	It was noted that there is no liaison office in Manavgat, and the Serik liaison office is not accessible for local citizens.	Representative of AAOİAŞ	Different communication channels (phone, email, CLO) will be used to facilitate citizens' access. Requests regarding office accessibility will be evaluated.
	Resident	Two lawyers attended the meeting and asked questions about expropriation processes.	Representative of AAOİAŞ	Answered questions regarding expropriation processes by Expropriation Director.
	Resident	The public requested a clear timeline for when expropriation negotiations and payments would be made.	Representative of AAOİAŞ	Expropriation payments and construction start dates will be determined in line with the official schedule, and landowners will be informed accordingly.
	Resident	Information was requested about the parcel sizes to be expropriated.	Representative of AAOİAŞ	It was explained that the total area along the route has been calculated and specific information will be provided to affected landowners.
	Resident	Participants stated that the offered expropriation compensations are far below market value.	Representative of AAOİAŞ	It was explained that landowners retain the right to appeal.

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
	Resident	Participants criticized the absence of representatives from KGM at the meeting.	Representative of AAOİAŞ	This feedback has been recorded; the necessary steps will be taken to ensure the participation of institutional representatives in future meetings.
	Resident in Örenşehir	Raised concerns about 15 years of income loss, asking who would cover this. Asked why shifting the road north is not possible, noting there are technical solutions. Asked what people will do for their livelihood after construction, emphasizing that they will not benefit from the motorway.	Representative of AAOİAŞ	Income losses and impacts on livelihoods will be assessed within the scope of the RAP. The road route has been determined based on technical requirements, and alternative requests will be recorded and forwarded to the relevant institutions.
	Resident in Hacıobası	Their house and business are affected. Asked why expropriation compensation is divided among all co-owners and how they can ensure that only they receive payment.	Representative of AAOİAŞ	Explained that consent must be obtained from other co-owners; if not, proof of ownership (e.g., bills) can be used. If necessary, a lawsuit can be filed to prove ownership.
	Resident in Taşağıl	Asked whether a study was carried out on dust and asbestos risks due to construction. Reported being close to the tunnel entrance and affected by blasting, leading to repeated complaints to the gendarmerie. Highlighted the presence of four elderly people (80+) and vulnerable individuals (Alzheimer's, visually impaired, broken arm), emphasizing negative impacts.	Representative of AAOİAŞ	Measures are being taken for dust control and blasting safety during the construction process, and regular measurements and inspections are being carried out. Vulnerable groups (the elderly, disadvantaged individuals) will be specifically assessed under the RAP and EIA.
	Headman of Taşağıl	Stated that the Taşağıl headman did not provide sufficient information about the meeting, and that they had difficulty learning about it.	Representative of AAOİAŞ	Meeting announcements were made through various channels (village council, public notice, website, newspaper). Feedback in this regard has been recorded. More frequent updates will be provided at subsequent meetings.
	Resident	Reported that her house and workplace at the Akseki road junction are affected by expropriation and that she has no other source of income.	Representative of AAOİAŞ	Payments for inherited land will be made in accordance with legal procedures. Loss of livelihood and damages will be

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		Asked how expropriation would be handled for inherited property. Expressed concern about losing her livelihood from running a roadside greengrocery.		addressed under the RAP.
	Headman of Gündoğdu	Reported that an electricity pole was placed on his land without official notification or expropriation information. Suggested that the route should pass 300–500 meters above the settlement to reduce impacts. Mentioned that high-voltage towers were initially placed in the middle of the road but later shifted to the side after consultations. Requested the installation of a low-voltage line. Another citizen reported that only 2 decares of land remained after expropriation and asked how the process would proceed. Criticized the absence of KGM at the meeting. Raised concerns that construction dust would prevent olive trees from yielding crops and asked how this would be compensated.	Representative of AAOİAŞ	<p>The expropriation processes for power lines and poles will be carried out in coordination with the relevant institutions, and official notifications will be made to the rightful owners.</p> <p>The route has been determined in accordance with current design engineering and safety standards.</p> <p>Requests for low-voltage lines will be forwarded to the relevant institutions and evaluated based on technical suitability.</p> <p>Dust control measures are being taken for trees, and compensation mechanisms will be activated under the RAP in case of damage.</p>
	Resident in Çolaklı	Reported having olive groves on land with 42 inheritance division agreements, where his mother is a co-owner. Requested that compensation for his mother's share be paid directly to her.	Representative of AAOİAŞ	Provided an explanation regarding the process.
	Lawyer	Stated that her clients learned about the expropriation by chance rather than through official notification. Requested information specifically about parcel 138/1530.	Representative of AAOİAŞ	Provided an explanation regarding the parcel.
	Headman of Aksaz	Reported that he had given consent for the service road route and was promised a stabilized road in return. Requested a dedicated information meeting for Aksaz.	Representative of AAOİAŞ	The request for a stabilized road has been recorded, and coordination with the relevant institutions will be ensured. Holding a special information meeting

Location - Date - Time	Participants	Question, Comment, or Suggestion	Responder	Feedback Summary
		Reiterated demand for route changes, suggesting the route should pass 20 meters above the settlement to reduce impacts.		for Aksaz will be evaluated. The route has been determined according to engineering criteria; requests will be recorded and forwarded to the relevant institutions.
	Headman of Ulukapı	Noted that sociologists, engineers, and foremen were assigned for community information, but there is a lack of legal support. Suggested that lawyers should also be involved in the process to ensure that both community and company rights are properly understood.	Representative of AAOLIAŞ	The necessary legal information will be provided so that stakeholders understand the process correctly. A proposal to include lawyers in the fieldwork has been recorded.

Across the four meetings, the most frequently raised issue was the demand for route changes. In particular, participants consistently emphasized the need to protect agricultural lands, cemeteries, and water resources. The view that the Konaklı junction would affect community life was also expressed. Concerns about level of expropriation payments and the process were among the asked questions. On the other hand, some participants stressed the clear need for the road and the necessity of a new arrangement to reduce the heavy traffic load in the region. In addition, repeated requests were made to ensure adequate underpasses, culverts, and connection roads to maintain access to houses, greenhouses, and agricultural lands.

During the meetings, questions regarding parcel information, payment schedules, and compensation mechanisms were answered by the Expropriation Director and the Environment & Social Manager. Furthermore, CLOs engaged in one-on-one communication with vulnerable groups both prior to and during the meetings. This approach ensured that the meetings were conducted in line with the principle of participation.

III.2.4. Internal Stakeholder Engagement Activities

Employee Satisfaction Survey

The internal stakeholders of a project are crucial for its healthy progress. The largest group of internal stakeholders in terms of quantity is the employees. Employees of the project sponsor and subcontractors are involved in all stages of the Project's life cycle. Therefore, engaging with internal stakeholders through stakeholder engagement activities is an essential and crucial key performance indicator criterion. The project sponsor is expected to conduct various stakeholder engagement activities with internal stakeholders.

As part of internal stakeholder engagement activities, the Project Sponsor may conduct an employee survey to gather feedback on the overall operation of the Project. This survey aims to identify areas for improvement in management and the workplace and emphasize the importance of gender equality. By doing so, the Project aspires to promote inclusivity and create a better working environment for all employees, ensuring that everyone's views are valued and considered in the quest to enhance workplace dynamics and fairness.

The suggested employee questionnaire is prepared with at least a 5-point Likert scale. The survey study is set up to analyze the answers given by the employees to the given statements. The answers are categorized as strongly disagree (1), disagree (2), partially agree (3), agree (4), and strongly agree (5). The statements given to the employees to express their opinions within the scope of the survey are as follows:

1. I am satisfied with the cafeteria and the food served.
2. In the workplace, cleanliness, organization, and order are given importance.
3. The company attaches great importance to occupational health and safety issues.
4. The company provides the personal protective equipment required for the job.
5. I am satisfied with the working hours.
6. The behavior of the employees towards each other is good.
7. I have access to the things I need to do my job well.
8. My salary makes me satisfied.
9. In general, I am happy with my supervisor/top manager.
10. I am satisfied with the Company's Management.
11. Necessary security measures (other than occupational health and safety issues) are taken in our company.
12. I recommend this company to work with.
13. I am satisfied with the possibilities offered for the service.
14. Social areas within the construction site where we can spend time outside work are sufficient.
15. I am happy with the laundry and dormitory conditions.
16. The company promotes gender equality and ensures equal opportunities for all employees.

This survey will be conducted separately by the female CLO for the female employees, and in order to avoid trust issues, it will be stated that the female employees will share all their problems except for the questions and that these will remain anonymous if they wish. How the process of complaints or requests received here will work is explained in the Grievance Mechanism section.

Provide SEAH and GBV training or develop a safety plan for women workers before the construction starts. It is detailed at Labor and Working Conditions chapter at ESIA.

IV. STAKEHOLDER IDENTIFICATION

In order to develop an effective SEP, it is necessary to determine who is likely to be affected (both directly and indirectly) by the Project (“affected parties”); who may have an interest in the Project (“interested parties”); and have the potential to influence project outcomes or operations.

An important stage of the stakeholder identification is the groups that are likely to be affected by the Project more or differently than other stakeholders, and whose influence on these possible impacts is expected to be relatively low. These groups are defined as “vulnerable groups” in the literature. One of the aims of the stakeholder engagement plan is to carry out an effective and sustainable communication, information and consultation process with these vulnerable groups. For this purpose, this SEP covers the following objectives related to vulnerable groups:

- Identifying vulnerable groups,
- The method and frequency of communication with vulnerable groups,
- Opportunities and priorities for vulnerable groups,
- Monitoring process,

IV.1. Stakeholder Identification Methodology

Stakeholders were identified through a structured and participatory methodology aligned with international best practices, including IFC Performance Standard 1, the Equator Principles.

The identification process aimed to ensure the inclusion of all individuals, groups, and organizations who may be directly or indirectly affected by the project or who may influence its outcomes. The detailed methodological steps followed during this process are presented in Table IV.1 .

Table IV-1. Methodological Steps for Stakeholder Identification Aligned with International Standards

Method	Description	Key Focus Areas	Target Groups / Sources
Desk-Based Review	Review of existing documentation and spatial data	Identification of affected areas, land parcels, community assets	ESIAs, Resettlement Frameworks and Baseline Studies, Local government records and cadastral maps, Previous stakeholder engagement records
Field Visits & Observations	On-site visits along proposed motorway corridor	Land use, mobility, seasonal migration (e.g., Yörük routes), presence of informal or unregistered groups	Local terrain and communities along the corridor
Key Informant Interviews (KIIs)	Semi-structured interviews with diverse local actors	Local insights on social dynamics, vulnerabilities, potential project impacts	Mukhtars, women, elderly, farmers, Yörük communities, seasonal workers, NGOs, CSOs
Vulnerability Mapping	Identification and assessment of at-risk populations	Vulnerability related to land acquisition, access to information, livelihood risks, social marginalization	Illiterate adults, women-headed households, seasonal workers, elderly, disabled, refugees

IV.1.1. Stakeholder Categorization

Stakeholders were categorized into Project-Affected People, Vulnerable Groups, Interested Parties, and Governmental and Regulatory Stakeholders. This multi-tiered classification ensured a comprehensive and inclusive approach focused on human rights risks related to displacement, participation, and access to remedies (see Table IV.2).

Table IV-2. Stakeholder Categorization

Category	Description / Details
Project-Affected People (PAPs)	Individuals and households directly impacted by land acquisition or construction activities; business owners
Vulnerable Groups	Those with limited capacity to participate in decision-making or to absorb adverse impacts
Interested Parties	Institutions, NGOs, unions, academic groups, business owners, or the general public with a stake in the project outcomes. This includes civil society actors and service organizations supporting local communities, including those involved in health, social welfare, gender-based violence response, shelter, or community development.
Governmental and Regulatory Stakeholders	Local, provincial, and national-level authorities responsible for project permitting and oversight. This also includes emergency response units (e.g., disaster management authorities, fire brigades), public health services, municipal utilities, and security or protection bodies involved in addressing GBV and community safety.

The vulnerable groups identified in the Project are as follows:

- Children
- Children with special needs
- Out-of-school children (school-age children who cannot attend school)
- Elderly people (75+)
- Elderly people requiring care and social assistance (65+)
- Illiterate adults
- Persons with chronic illness (e.g., heart, diabetes, kidney)
- Persons with other serious health conditions (e.g., cancer, Alzheimer)
- Disabled persons (physical / mental)
- Unemployed people (even though they are actively seeking work)
- Seasonal agricultural workers
- Households dependent on natural resources (agriculture, livestock, forest products)
- Green Card holders
- State aid beneficiaries
- Informally employed workers (without social security)
- Physically and economically displaced households
- Female-headed households
- Landless households
- Low-income households (below minimum wage)
- Migrant and refugee households (e.g., Syrian, Afghan)
- Ethnic or linguistic minority groups
- Semi-nomadic Yörük communities
- Households previously affected by expropriation

Gender inequality may be seen in stakeholder engagement process. Although it is not defined as a vulnerable group on its own, it is necessary to be sensitive to situations where women cannot take part in these stakeholder engagement activities. Project Sponsor should consider gender equality in the stakeholder engagement processes of the project and should approach with sensitivity to the problems that may arise in this regard. Project Company will take short and long-term steps towards resolving these problems. Arranging time and space so that women can participate in meetings and other events

equally is one of the simplest and most effective steps that can be taken in this regard. In addition to the above-mentioned vulnerable groups, gender equality will be considered in the process of stakeholder identification, consultation with stakeholders and grievance management process.

In the context of the Project, women are identified as a vulnerable group due to a combination of socio-economic, cultural, and spatial dynamics that influence their exposure to project-related impacts. Because the location area of the project is rural and peri-urban areas, women often rely on informal or subsistence-based economic activities - such as agriculture, livestock care, and seasonal labor - which are typically unregistered and under-recognized in compensation and livelihood restoration schemes. Moreover, women may face mobility restrictions due to gender norms and lack of access to private transportation, which can be further exacerbated if the motorway alters local routes, increases travel distances, or reduces public transportation availability. In areas like Manavgat, where tourism and agriculture are dominant, women's economic roles are often linked to place-based activities (e.g., local markets, childcare close to home), making them more vulnerable to displacement or disruption. Additionally, the influx of a temporary male workforce during construction may elevate risks of gender-based violence and harassment, particularly in communities with limited protective infrastructure or social services. For these reasons, it is crucial that the project incorporates a gender-sensitive approach in its impact assessments, stakeholder engagement processes, and mitigation strategies to ensure that women's voices are heard, their specific risks addressed, and their livelihoods and well-being protected.

In the neighborhoods within the impact area of the project, especially in the Central neighborhood of Serik district, it was determined in the field study conducted by Encon in June 2024 that Syrians under temporary protection status and Syrian Migrants live. According to Refugees Association's May 2025 Report, the number of Syrians living in Antalya is 6,839. Attacks against Syrian refugees, especially in Serik district, were reported in the news.

On the other hand, nomads living in the Antalya region go to the plateau at certain times of the year. Antalya-Serik-Ovacık plateau visited by Yoruks is located within the project area. Nomads who will pass through this region are a vulnerable group both in terms of the impact of construction on their journeys and in terms of accommodation. The migration pathway of nomads is given in FigureVII.1 as referenced to the motorway alignment.

On the other hand, nomads living in the Antalya region go to the yayla at certain times of the year. A section of the migration route to the Antalya-Serik-Ovacık yayla, which is visited by the Yörüks, is located 1,200 meters from the project area. Nomads passing through this region are a vulnerable group in terms of both the impact of construction on their journeys and accommodation. The migration route of the nomads is given in Figure IV.1 according to the highway route.

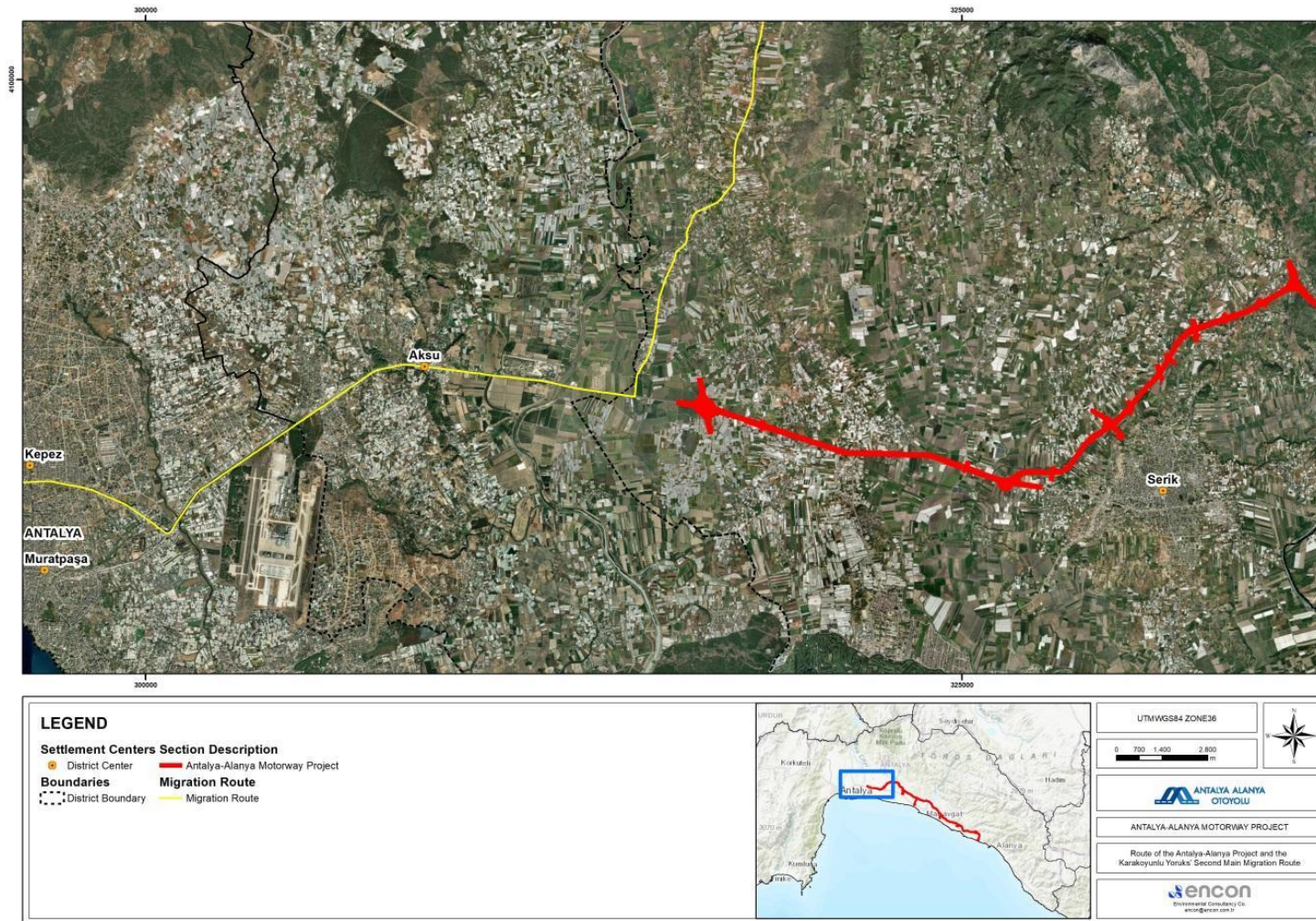


Figure IV-1 The Migration Pathway of Nomads in the Region

IV.1.1.1. Project-Affected People (PAPs)

Project-Affected People (PAPs) are defined as individuals, households, or communities who will experience either physical or economic displacement as a result of the Antalya–Alanya Motorway Project. The identification of PAPs is based on expropriation plans (as of April–May 2025), site-specific scoping studies, and preliminary stakeholder consultations. Impacts vary by geography, land tenure, land use, and vulnerability status. The categories of Project-Affected People (PAPs) identified for the Antalya–Alanya Motorway Project are summarized in Table IV.3, based on expropriation plans, scoping studies, and preliminary consultations, reflecting variations in land tenure, land use, and vulnerability.

Table IV-3. Categories of Project-Affected People (PAPs) for the Antalya–Alanya Motorway Project

Category	Description / Key Details
1. Landowners and Land Users	Privately-owned parcels will be subject to expropriation. These include agricultural fields, orchards, greenhouses, and constructible plots. Some parcels may become “orphaned land,” and in addition, there are lands informally used by non-owners such as farmers or tenants.
2. Structure Owners	299 houses, 599 greenhouses, 37 business structures affected - many with multiple structures - Includes small-scale agricultural and informal businesses
3. Livelihood-Dependent Farmers	Households losing >20% of productive land, especially greenhouse/orchard farmers, at high economic displacement risk - Parcels <500 m ² post-expropriation considered unviable for farming
4. Residents in Fragmented or Severed Parcels	Parcels divided by motorway causing difficult or impossible internal access - Planned engineering solutions (underpasses, culverts) to mitigate access loss; effectiveness to be confirmed via RAP consultations
5. Vulnerable and Marginalized Groups	Illiterate adults unable to comprehend expropriation/compensation - Elderly with limited mobility/access - Women without land title or informal income earners - Migrants, refugees, seasonal workers with undocumented tenure - Semi-nomadic Yörük communities with migration routes crossing project area, children
6. Users of State-Owned and Public Lands	Greenhouses/agricultural plots on state treasury or forest lands used informally by locals - May qualify for compensation or assistance under national policies or livelihood restoration programs

Project-Affected People by Settlement

Based on the expropriation data and field surveys from April–May 2025, the following neighborhoods are most significantly affected. In addition, specific findings on Migratory Status and Nomadic Populations (Yörük Communities) have been presented separately below the table, as the former draws on both ENCON fieldwork and data from the Refugees Association, while the latter was identified during the desk study stage.

Table IV-4. Vulnerability Groups in the Expropriation Corridor

District	Neighbourhood	Vulnerable Groups
Serik	Deniztepesi	Other significant health issues, Economically displaced household
	Sarıbalı	Physically displaced household, Economically displaced household, Landless household, Household s who lose more than 20 percent of their total productive area, Women-headed household, Low income household, Unemployed (Although looking for a job), Chronic diseases, Children of school age who do not attend school, Illiterate, Mental Disability/ Issues, People who do not speak and/or understand Turkish
	Çandır	Economically displaced household, Household s who lose more than 20 percent of their total productive area
	Cumalı	Economically displaced household, Chronic diseases, Physical Disability, Mental Disability/ Issues
	Burmahancı	Economically displaced household, Landless household, Low income household, Household s who lose more than 20 percent of their total productive area
	Üründü	Economically displaced household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases
Manavgat	Çakış	Economically displaced household, Low income household, Households who lose more than 20 percent of their total productive area, Elderly (over 65) in need of care, Illiterate, Physical Disability

District	Neighbourhood	Vulnerable Groups
	Taşagül	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Women-headed household, Low income household, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases, Other significant health issues
	Gündoğdu	Economically displaced household, Low-income households, Chronic diseases
	Hocalar	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Low-income households, Elderly (over 65) in need of care, Illiterate, Chronic diseases, Unemployed (Although looking for a job)
	Yavrudoğan	Economically displaced household, Households who lose more than 20 percent of their total productive area, Women-headed household, Low income household, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Illiterate, Chronic diseases
	Çolaklı	Physically displaced household, Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Women-headed household, Low income household, Seasonal agricultural worker, Illiterate, Chronic diseases
	Seki	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Chronic diseases
	Kalemler	Economically displaced household, Households who lose more than 20 percent of their total productive area, Landless household, Women-headed household, Low income household, Elderly (over 65) in need of care, Chronic diseases, Physical Disability
	Evren	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases
	Yeniköy	Economically displaced household, Elderly (over 65) in need of care, Chronic diseases
	Şişeler	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Children with special needs, Chronic diseases
	Evrenleryavşı	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Children with special needs, Chronic diseases, Unemployed (Although looking for a job)
	Yukarıışıklar	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Illiterate, Physical Disability, Chronic diseases, Mental Disability/ Issues, Seasonal agricultural workers
	Dikmen	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area
	Bucakşeyhler	Economically displaced household, Low income household, Illiterate, Physical Disability, Chronic diseases
	Ulukapı	Economically displaced household, Low income household, Households who lose more than 20 percent of their total productive area, Chronic diseases
	Aşağıışıklar	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Physical Disability, Chronic diseases, Other significant health issues
	Karaöz	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Chronic diseases
	Aksaz	Economically displaced household, Landless household, Low income household, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Chronic diseases
	Haciali	Economically displaced household, Low income household, Household resettled in the neighborhood after earthquake or other disasters (Fire), Households who lose more than 20 percent of their total productive area, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Illiterate, Chronic diseases
	Cevizler	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Chronic diseases
Hacisalı	Economically displaced household, Low income household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases, Other significant health issues	
Hacıobası	Economically displaced household, Women-headed household, Landless household, Low income household, Households who lose more than 20 percent of their total	

District	Neighbourhood	Vulnerable Groups
		productive area, Significantly affected by expropriation of other past projects, Advance Old Age (over 75, Chronic diseases, Physical Disability, Other significant health issues
	Uzunlar	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75, Chronic diseases, Elderly (over 65) in need of care, Physical Disability, Other significant health issues
	Kadılar	Economically displaced household, Women-headed household, Low income household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases, Other significant health issues, Beneficiary of governmental aid
	Örenşehir	Economically displaced household, Households who lose more than 20 percent of their total productive area, Chronic diseases
	Yalçıdibi	Economically displaced household, Women-headed household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75, Chronic diseases, Elderly (over 65) in need of care, Illiterate, Physical Disability, Other significant health issues
	Odaönü	Economically displaced household, Low income household, Households who lose more than 20 percent of their total productive area, Chronic diseases
	Karakaya	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Significantly affected by expropriation of other past projects, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Physical Disability, Chronic diseases, Seasonal agricultural workers
Alanya	Alara	Economically displaced household, Women-headed household, Landless household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Illiterate, Chronic diseases
	Çakallar	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Advance Old Age (over 75), Elderly (over 65) in need of care, Illiterate, Chronic diseases, Mental Disability/ Issues, Beneficiary of governmental aid
	İncekum	Economically displaced household
	Türkler	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Chronic diseases, Physical Disability
	Emişbeleni	Economically displaced household, Landless household, Households who lose more than 20 percent of their total productive area, Illiterate
	Toslak	Economically displaced household, Landless household, Low income household, Households who lose more than 20 percent of their total productive area, Elderly (over 65) in need of care, Illiterate, Chronic diseases, Physical Disability, Mental Disability/ Issues, Employed without social security
	Telatiye	Economically displaced household, Households who lose more than 20 percent of their total productive area, Chronic diseases
	Elikesik	Economically displaced household, Landless household, Low income household, Illiterate, Chronic diseases, Seasonal agricultural workers

Migratory Status: Field research conducted by Encon in June 2024 identified Syrian citizens and other migrant groups under temporary protection, particularly in the Central District of Serik. Greenhouse owners in Serik, Manavgat, and Alanya districts have stated that they employ migrant workers. Seasonal workers are primarily Afghan and Syrian nationals. According to the RAP Report, registered and unregistered migrant workers are present in the neighborhoods of Emişbeleni, Aşağıçatma, Evren (registered), Toslak, and Çakış. According to the Refugees Association, as of May 2025, there are approximately 6,839 Syrians residing in Antalya. Tensions toward refugees have been reported, particularly in Serik. Project materials will be provided in Arabic to support inclusive participation. Additionally, necessary information will be communicated specifically by CLOs.

Nomadic Populations (Yörük Communities): Seasonal nomadic groups such as the Yörüks were identified along migration routes passing near the project alignment (~1,200 m away at times). Semi-nomadic communities are also present in Toslak, Ulukapı, and Karakaya. These groups often:

- Rely heavily on livestock grazing and pasture access
- Have low literacy rates and limited access to health services
- Are excluded from formal consultation due to their mobile lifestyle

To support them, the project will incorporate culturally sensitive engagement methods, preserve grazing corridors where feasible, and consider compensation or assistance through the Livelihood Restoration Plan.

Within the scope of the Project, it is important to identify stakeholders at the beginning of the process to inform key stakeholders (local people, relevant state institutions and NGOs) about the Project and provide effective participation of the stakeholders. To this end, the following individuals and groups should be considered specifically:

- People who are likely to be affected, directly or indirectly by the Project,
- People or institutions may have an interest in the Project,
- People or institutions that have the potential to influence
- Project outcomes or company operations.

Besides it is an important process to identify vulnerable or disadvantaged people or groups, who are likely to be affected by the Project in certain phases, accurately during the identification of stakeholders. Possible stakeholders who are likely to be affected by the Project or have an influence on the Project are listed below:

- Project employees, including Contractors. Project parties;
- National governmental and non-governmental organizations (NGOs);
- Local governmental organizations and NGOs;
- Local residents (potentially project affected persons including vulnerable groups); and
- Local businesses and universities

The stakeholders listed in Table IV.5 are the most prominent in the Project. Organizations or groups not listed can contact the Project Sponsor and provide their contact information to be informed about the Project.

People living in residential areas near the Project will be considered as potential Project affected people/population (PAP) in this Stakeholder Engagement Plan (SEP). These settlements are also listed in Table IV.5. Therefore, one of the objectives of the SEP is to effectively consult and share information with these groups and address their concerns.

Table IV-5. Project’s Stakeholders List

Level	Category	Organization / Entity
Internal	Appointed Company	Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş
	Contractor’s Personnel	Information N/A
	Sub-contractors	Information N/A
National	Ministries and Relevant Authorities	Ministry of Transportation and Infrastructure
		General Directorate of Highways
		General Directorate of Infrastructure Investments
		General Directorate of Transport Services Regulation
		Ministry of Agriculture and Forestry
		General Directorate of State Hydraulic Works (DSİ)
		General Directorate of Forestry
		General Directorate of Meteorology

Level	Category	Organization / Entity
		Ministry of Environment, Urbanization and Climate Change
		General Directorate of Spatial Planning
		General Directorate of Environmental Management
		General Directorate of Preservation of Natural Heritage
		General Directorate of Land Registry and Cadaster
		Ministry of Culture and Tourism
		General Directorate of Cultural Heritage and Museums
		Ministry of Energy and Natural Resources
		General Directorate of Mineral Research and Exploration
		General Directorate of Electricity Generation Corporation (EUAS)
		General Directorate of Electricity Transmission Company (TEIAS)
		Ministry of Interior
		Gendarmerie General Command
		General Directorate of Security Affairs
		Ministry of Labor and Social Security
		General Directorate of Turkish Employment Agency (ISKUR)
		Ministry of Development
		Ministry of Defense
		Petroleum Pipeline Company (BOTAS)
		Prime Ministry's Disaster and Emergency Management Presidency (AFAD)
	NGOs	The Union of Chambers and Commodity Exchanges of Turkey (TOBB)
		World Wide Fund for Nature (WWF)
		Foundation for the Protection and Promotion of the Environment and Cultural Heritage (CEKUL)
		Environment Foundation of Turkey
		Turkish Environmental and Woodlands Protection Society (TURCEK)
		Union of Forestry Workers (ORMAN-IS)
		Union of Turkish Roads, Buildings and Construction Workers (YOL-IS)
		Confederation of Unions of Turkish Workers (TURK-IS)
Union of Construction Industry Employers (INTES)		
The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats (TEMA)		
Nature Association		
Regional		Governmental Agencies and Authorities
	Ministry of Transportation and Infrastructure Regional Directorate of Highways	
	Antalya Regional Directorate of Forestry	
	Antalya Water and Sewerage Administration	
	Antalya Provincial Directorate of Employment Agency	

Level	Category	Organization / Entity
		Antalya Regional Directorate of the Conservation Council for Cultural Heritage
		General Directorate of Highways 13th Regional Directorate
	NGOs	Greenhouse Investors and Producers Association
		Eastern Mediterranean Research Association
		Mediterranean Protection Association
		Turkish Foresters Association Western Mediterranean Branch
		Mediterranean Association
		Archaeologists Association Western Mediterranean Branch
Mediterranean Archaeology Association		
Local	Governmental / Local Authorities and Agencies	Antalya Governorate
		Antalya Metropolitan Municipality
		Serik District Governorate
		Manavgat District Governorate
		Alanya District Governorate
		Serik District Municipality
		Manavgat District Municipality
		Alanya District Municipality
		Antalya Provincial Police Department
		Antalya Provincial Gendarmerie Command
		Antalya Provincial Family and Social Policies Directorate
		Antalya Provincial Culture and Tourism Directorate
		Antalya Regional Heritage Board
		Antalya Agriculture and Forestry Directorate
		Antalya Provincial Food, Agriculture and Livestock Directorate
		Antalya Forestry Regional Directorate
		Antalya Provincial Industry and Trade Directorate
		Antalya Environment, Urbanization and Climate Change Provincial Directorate
		Antalya Provincial Directorate of National Education
	NGO's	Antalya Orchids and Biodiversity Protection Association (ANTOK, TÜRKİYE)
		Antalya Chamber of Commerce and Industry
		Turkish Agriculturalists Association Antalya Branch
		Turkish Nature Protection Association Antalya Branch
		Natural Resources and Biodiversity Protection Association
		Antalya Cultural Heritage Association
		Women's Social Life Research and Examination Association Antalya Branch
		Antalya Environment Platform
		Antalya Women's Cooperative

Level	Category	Organization / Entity
		Antalya Businesswomen's Association (ANTİKAD)
		Serik Chamber of Agriculture Presidency
		Serik Chamber of Tradesmen and Craftsmen Presidency
		S.S. Serik Boğazkent Women's Initiative Production and Business Cooperative
		Manavgat Women of Taurus Cooperative
		Turkish Agricultural Credit Cooperatives- Antalya
		TMMOB Chamber of City Planners Antalya Branch
		TMMOB Chamber of Agricultural Engineers Antalya Branch
		TMMOB Chamber of Forest Engineers Western Mediterranean Branch
		Alanya Sera-Bir Association
		Culture Routes Society
		Mediterranean Youth Association
		Antalya Industrialists and Business People Association
		Serik Youth Education Culture, Environment and Sport Association
	Residential Areas/Local Communities/Mukhtars/Potentially Project Affected People*	Antalya/Serik: Yukarıkocayatak, Aşağıkocayatak, Kayaburnu, Dikmen, Çandır, Aşağıçatma, Burmahancı, Cumalı, Üründü, Deniztepesi, Sarıbalı, and Belpınarı, Neighborhoods
		Antalya/Manavgat: Çakış, Taşağıl, Gündoğdu, Hocalar, Yavrudoğan, Çolaklı, Seki, Kalemler, Evren, Ilıca, Yeniköy, Şişeler, Evrenleryaşlı, Dolbazlar, Yukarıışıklar, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıalı, Cevizler, Sülek, Hacısalı, Hacıobası, Kızılot, Uzunlar, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya Neighborhoods
		Antalya/Alanya: Alara, Çakallar, İncekum, Avsallar, Akdam, Türkler, Payallar, Emişbeleni, Toslak, Telatiye (Konaklı), Elikesik Neighborhoods
		Users of the pasture located within the License Area of the Project*
	Business Enterprises	Business enterprises located along the route
	Universities	Akdeniz University
Alanya Alaaddin Keykubat University		
Antalya Bilim University		
Antalya Belek University		
Alanya University		

IV.1.2. Field Study Report

The result of the field study is shown in the Table IV.6 . Processes like expropriation, public consultation meetings, working conditions will be advanced according to these results.

Table IV-6. The Result of the Field Study

District	Neighborhood	Findings About Vulnerable Groups
Serik	Merkez	There is no vulnerable group that does not receive support within the knowledge of the mukhtar. There is a high proportion of Syrian refugees/immigrants living in this neighborhood.

District	Neighborhood	Findings About Vulnerable Groups
Manavgat	Taşığıl	Since the elderly population in the neighborhood is high and the elderly population in need of care and social assistance is the dominant group, a focus group study was conducted.
Manavgat	Kalemler	A focus group study was conducted since the female population of the neighborhood is dominated by divorced/divorced women. Generally, female heads of households and single women work or their children provide care for those who are unable to work. **It was identified that the house and adjacent agricultural land in the potential impact area of the highway project belongs to a physically disabled household head (male). This person stated that he lives on his own. He stated that there is a risk of losing 95% of his land due to expropriation. Parcels: 136/6, 136/7.
Manavgat	Ulukapı	Considering the neighborhood population, the female household head vulnerable group is in the majority. A vulnerable focus group interview was conducted with female participants.
Manavgat	Hacısalı	A focus group study was conducted in the neighborhood as the population of women who have lost their spouses/divorced and elderly people in need of care are the dominant group. It was informed that there are 3 people who will lose more than 20% of their total productive area in this neighborhood in the potential impact area of the motorway project. Two people have olive groves and one person has a glass greenhouse on the project route. It was informed that the land and residence of the female-headed household will probably be affected by the project.
Manavgat	Karakaya	Considering the neighborhood population, no dominant vulnerable group has been identified. It was informed that the route of the highway passes through the agricultural land and residence of the disabled person.
Alanya	Alara	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Çakallar	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Akdam	There may be farmers who have lost more than 20% of their total productive area due to expropriation. It was also informed that the land and residence of the female-headed household would likely be affected by the project.
Alanya	Toslak	There may be farmers who have lost more than 20% of their total productive area due to expropriation.
Alanya	Konaklı	There may be farmers who have lost more than 20% of their total productive area due to expropriation.

*Source: ENCON Field Study (2024)

V. STAKEHOLDER ENGAGEMENT PLAN

This part of the SEP introduces the stakeholder engagement plan for the Project Company and gives a detailed description of the disclosure process and timeline. It then presents AAMP's methods and frequencies for stakeholder engagement, along with the proposed stakeholder engagement plan for the construction and operation phases.

V.1. Methods and Tools for Information Dissemination and Stakeholder Engagement

Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. used appropriate methods to disclose information about the planned Project, consult with stakeholders on potential benefits and risks of the planned project and potential adverse impact mitigation measures. Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the proposed projects. Information will be disclosed using methods, which is suitable for various groups of stakeholders at all project implementation stages. For all disclosure attempts IFC PS1 and EPFI Principle 5 is followed and by doing so, the Project is kept in international standards. The relevant means for consultations with stakeholders with possible timing are provided in Table V.1 .

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- Formal/ informal face-to-face meetings,
- Focus group meetings,
- One-on-one interviews,
- Digital communication tools (including web pages, correspondence by phone/email, WhatsApp, short message service),
- Written materials,
- Grievance mechanism,
- Social Media promotions.

A range of tools are being utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. The project has and will continue to use the following methods for interacting with stakeholders:

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT	Doc Code	ENC_AAOIAS_AAMP_SEP_08
ANTALYA-ALANYA MOTORWAY PROJECT	REV	08
STAKEHOLDER ENGAGEMENT PLAN	DATE	October 2025

Table V-1. Stakeholder Engagement Plan - Communication Methods with Timing

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
MoTI – General Directorate of Highways (KGM)	<ul style="list-style-type: none"> ●To exchange information and build understanding and consensus on the project progress, implementation of ESIA, SEP, RAP, and other project specific E&S management action plans and procedures. ●To establish implementation responsibilities and coordination mechanism related to project progress and project E&S documents ●To provide necessary information and reporting on relevant and important stakeholder engagement activities and address issues that concern local communities and stakeholders 	<ul style="list-style-type: none"> ●Through digital copies of E&S documentation published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) ●Through hard copies of E&S documentation (in the format requested by the authority) ●Face-to-face meetings ●Information disclosure and reports, monitoring, permit requests 	<ul style="list-style-type: none"> ●KGM (Ankara) ●SPV offices ●Project site offices ●Official correspondence (monthly reports and permits) <p>Project website (https://www.antalyaalanyaotoyolu.com.tr/)</p>	Monthly	<ul style="list-style-type: none"> ●Corporate Senior Management ●SPV – General Manager ●SPV – E&S Manager

¹ The frequency indicated will be valid for the construction phase. Prior to operation phase, the frequency will be updated in consultation with Lenders and IESC.

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
13 th Regional Directorate of KGM			<ul style="list-style-type: none"> ●13th Regional Directorate of KGM (Antalya) ●Project site offices ●Official correspondence (monthly reports and permits) ●Project website (https://www.antalyaalanyaotoyolu.com.tr/) 	Bi-weekly	<ul style="list-style-type: none"> ●Corporate Senior Management ●SPV – General Manager ●SPV – E&S Manager ●SPV – Expropriation Manager ●EPC – Project Director

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Antalya Regional Heritage Board	<ul style="list-style-type: none"> ●Coordination on the protection and management of tangible cultural heritage during construction and operation stages ●Continuous engagement regarding management, monitoring and assurance of Project impacts on cultural heritage assets, including vibration impacts of blasting and grave relocation ●To notify the ARHB about the cultural heritage sites found in project corridor ●To obtain permits on conducting trial pits, salvage excavations on the cultural heritage sites ●To work in coordination with Board's experts on excavation works as requested by Board 	<ul style="list-style-type: none"> ●Face-to-face meetings with the ARHB ●Regular monitoring and reporting by the Project Archaeologist ●Joint review meetings in case of vibration-related findings or heritage risks <p>Joint meetings in case of grave relocation</p>	<ul style="list-style-type: none"> ●Related Cultural Heritage Sites ●Project site offices ●Official correspondence (meeting, permits, letters, reports) 	Meetings whenever required (Ongoing throughout Project's construction phase – at least monthly communication)	<ul style="list-style-type: none"> ●Corporate Senior Management ●SPV – General Manager ●SPV – E&S Manager ●EPC – E&S Manager ●EPC - Archaeologist

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
<p>Local and Central Governmental Institutions/Agencies</p> <p>(District Governorates, DSI, Forestry and etc.)</p> <p>(see Table IV.5 for other Local Governments)</p>	<ul style="list-style-type: none"> To inform regarding Project progress and undertake official correspondence To obtain necessary approvals/permits/opinions during project execution 	<ul style="list-style-type: none"> Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) Through hard copies (in the format requested by the authority) Official correspondence (letters, etc.) Face-to-face meetings <p>Information disclosure and reports, monitoring, permit requests</p>	<ul style="list-style-type: none"> Official correspondence (permits, letters, reports) Project website (https://www.antalyaalanyaotoyolu.com.tr/) SPV offices Project site offices 	<p>Meetings whenever required (Ongoing throughout Project's construction phase – at least monthly communication in case of permits)</p>	<ul style="list-style-type: none"> Corporate Senior Management SPV – General Manager SPV – E&S Manager SPV – Expropriation Manager EPC – Project Director
<p>AFAD Local emergency services, fire brigades, utility owners and operators, local police, coast guard, health services</p>	<ul style="list-style-type: none"> To inform relevant local authorities about Project and undertake official correspondence when needed Coordinate on emergency preparedness and response. 	<ul style="list-style-type: none"> Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) Official correspondence Face-to-face meetings 	<ul style="list-style-type: none"> Meetings in person and official letters Project website (https://www.antalyaalanyaotoyolu.com.tr/) 	<p>On a periodic basis and whenever coordination is required for safety or emergency planning</p>	<ul style="list-style-type: none"> SPV – HS Manager EPC – HS Manager

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Settlement Heads (Mukhtars)	<ul style="list-style-type: none"> ●To provide/exchange up-to-date information about the project in a timely, understandable, manner regarding the following; <ul style="list-style-type: none"> - Project progress - Potential E&S impacts of the activities (such as blasting) - Expropriation process - Planned stakeholder engagement events ●To collect feedback, grievances, suggestions related with the Project ●To identify specific concerns/issues related to vulnerable persons and women, including gender-based violence and harassment (GBVH). 	<ul style="list-style-type: none"> ●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 <p>Related brochures and booklets</p>	<ul style="list-style-type: none"> ●Project site offices ●Offices of the settlement heads or other mutually agreed locations in affected settlements ●Project website (https://www.antalyaalanyaotoyolu.com.tr/) 	<p>Monthly in each settlement throughout the construction phase</p> <p>Grievance boxes and feedback will be checked on a weekly basis throughout the Project's construction phase</p>	<ul style="list-style-type: none"> ●SPV – E&S Manager ●SPV – Expropriation Manager ●EPC – Project Director <p>SPV – CLOs</p>

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Affected Households		<ul style="list-style-type: none"> ● 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 <p>Phone calls and messaging applications</p>	<ul style="list-style-type: none"> ● Affected house plot or mutually agreed locations in affected settlements <p>Project website (https://www.antalyaalanyaotoyolu.com.tr/)</p>	<p>Periodically in each settlement throughout the construction phase</p> <p>Grievance boxes and feedback will be checked on a weekly basis throughout the Project's construction phase</p>	<ul style="list-style-type: none"> ● SPV – E&S Manager ● SPV – Expropriation Manager ● EPC – Project Director <p>SPV – CLOs</p>
<p>Women and Vulnerable and members of the local/affected households</p> <p>(see Section IV.1.1 Stakeholder Categorization for vulnerable groups)</p>		<ul style="list-style-type: none"> ● Face-to-face individual meetings <p>Phone calls and messaging applications</p>	<p>Residences of vulnerable households or women or mutually agreed locations in affected settlements</p>	<p>Periodically in each settlement throughout the construction phase</p> <p>Grievance boxes and feedback will be checked on a weekly basis throughout the Project's construction phase</p>	<ul style="list-style-type: none"> ● SPV – E&S Manager ● SPV – Expropriation Manager ● EPC – Project Director <p>SPV – CLOs</p>

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Local/affected businesses		<ul style="list-style-type: none"> ● 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 <p>Phone calls and messaging applications</p>	<ul style="list-style-type: none"> ● Affected business structures or other mutually agreed locations ● Project website (https://www.antalyaalanyaotoyolu.com.tr/) 	In accordance with RAP	<ul style="list-style-type: none"> ● SPV – E&S Manager ● SPV – Expropriation Manager ● EPC – Project Director SPV – CLOs

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Households / local communities / businesses near blasting areas	<ul style="list-style-type: none"> To inform residents about upcoming blasting activities and schedules <p>To ensure public safety and awareness regarding vibration, noise, and access restrictions</p>	<ul style="list-style-type: none"> Posting blasting schedule on public bulletin boards, in tea/coffee houses, and at mosques. Audible announcements through mosques or local loudspeakers. Messages or calls via local messaging platforms (e.g., WhatsApp). Face-to-face or one-to-one notification meetings with residents of nearby settlements, if any. 	<ul style="list-style-type: none"> Conducted in person to residents of nearby settlements communication channels, including: Bulletin boards Mosques or local speakers Calls or messaging applications (e.g., WhatsApp) 	<p>Prior to each blasting at all relevant sites/settlements:</p> <ul style="list-style-type: none"> Public posting: Before blasting starts in each settlement Messages via messaging platforms: 1–2 days before each blasting Audible announcements: On the blasting day, before each blasting 	<ul style="list-style-type: none"> EPC - Basting Chies SPV – E&S Manager EPC – E&S Manager SPV CLOs
Lenders	<ul style="list-style-type: none"> To inform and update the Lenders about the project Project's E&S Performance 	<ul style="list-style-type: none"> Through digital copies published on Project website (https://www.antalyaalanyaotoyolu.com.tr/) Reporting E-mail correspondence Phone calls Face to face meetings 	<ul style="list-style-type: none"> Project website (https://www.antalyaalanyaotoyolu.com.tr/) Project site offices Other venues to be agreed upon 	<p>Quarterly monitoring site visits during construction (by Lenders or their IESC)</p> <p>Periodic monitoring site visits during operation (by Lenders or their IESC)</p>	<ul style="list-style-type: none"> Corporate Senior Management SPV – General Manager SPV – E&S Manager

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Interested national and local NGOs (see Table IV.5 for NGOs) (Other interested organizations will be added, as identified throughout the life of the Project)	<ul style="list-style-type: none"> To provide information on the nature of the Project, duration of the Project, potential environmental, social and economic impacts (positive and negative) To potentially help to identify key issues pertaining to the local community (vulnerable groups) and the local environment 	<ul style="list-style-type: none"> Special engagement methods to be developed based on relevance and interest of stakeholders 	<ul style="list-style-type: none"> Project website (https://www.antalyaalanyaotoyolu.com.tr/) Other venues to be agreed upon NGO Offices Public bulletin boards 	As required throughout construction	<ul style="list-style-type: none"> Corporate Senior Management
Engagement with the relevant authorities (such as municipal departments, Cemetery Guardian / religious leader, etc.) (for grave relocation)	<ul style="list-style-type: none"> To engage with relevant authorities about their responsibilities related to grave relocation To have official correspondence, etc., with participation from relevant authorities as needed 	<ul style="list-style-type: none"> Official correspondence (meetings, phone calls, etc.) Face-to-face meetings 	<ul style="list-style-type: none"> Meetings in person with relevant authorities Official correspondence (letter, permits) with relevant authorities 	During the gravel relocation planning phase – prior to grave relocation	<ul style="list-style-type: none"> Corporate Senior Management SPV – General Manager SPV – E&S Manager EPC – E&S Manager EPC - Archaeologist

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Engagement with grave owners (for grave relocation)	<ul style="list-style-type: none"> ●To communicate (one to one) with grave owners and obtain signed consent forms 	<ul style="list-style-type: none"> ●Face-to-face meetings 	<ul style="list-style-type: none"> ●Mutually agreed locations with grave owners 	During the gravel relocation planning phase – prior to grave relocation	<ul style="list-style-type: none"> ●Corporate Senior Management ●SPV – General Manager ●SPV – E&S Manager ●EPC – E&S Manager ●EPC - Archaeologist

Stakeholder	Purpose of Communication / Areas of Information Disclosure	Engagement / Communication Method	Platform	Frequency of Engagement ¹	Responsible
Internal Stakeholders (Contractor and Subcontractor employees)	<ul style="list-style-type: none"> ●To share information on; <ul style="list-style-type: none"> - Project Standards including Project specific E&S policy and ESMS Documentation - Project-related news - Workers rights and working conditions, - Occupational health and safety requirements ●Ensure successful implementation of the Project SEP including the internal and external grievance and feedback mechanisms (covering internal GBVH issues) 	<ul style="list-style-type: none"> ●Sharing relevant written documentation with the Project employees (at the time of hiring) ●Induction and orientation trainings (at the time of hiring) ●Job-specific trainings ●Training on E&S Management System ●Emergency Preparedness Drills 	<ul style="list-style-type: none"> ●Project website (https://www.antalyaalanyaotoyolu.com.tr/) ●Contractor/subcontractor construction camp/facility sites, ●Camp site accommodation facilities 	<ul style="list-style-type: none"> At the time of hiring At frequencies specified for each engagement method 	<ul style="list-style-type: none"> ●Corporate Senior Management ●SPV – General Manager ●SPV – E&S Manager ●EPC – E&S Manager ●SPV – HS Manager ●EPC – HS Manager ●SPV - CLOs

To ensure inclusive and equitable participation in the project lifecycle, the following gender-sensitive engagement measures are being implementing:

- **Targeted Outreach to Women:** Separate consultation meetings with women in each affected settlement, facilitated by female staff at every neighborhood in the Project area without exception from beginning of the construction. .It is defined below at the Stakeholder Engagement Plan Section.
- **Accessible Meeting Formats:** The meetings are organized to start at 10.00 - 11.00 a.m. the most convenient time of the day for women,
- **Trusted Local Channels:** Utilize existing women’s networks, cooperatives, health centers, and neighborhood heads to disseminate project-related information.
- **Language and Literacy Considerations:** Use visual materials and oral communication methods to accommodate illiterate and semi-literate women.
- **Safe Reporting Mechanisms:** Design grievance systems that allow confidential reporting of gender-based risks and ensure that women feel secure using these channels.
- The call center with the Grievance Mechanism will have a dedicated contact number for women and ensure that the staff listening to the complaint/request are women.
- **Continuous Feedback Loops:** Review and, where appropriate, integrate women’s feedback into project decisions, and provide tailored updates to explain how their input has been addressed.

These measures aim to strengthen social inclusion and minimize unintended harms by addressing the gender-specific barriers that may prevent full participation and benefit sharing.

All neighborhood mukhtars (names of neighborhoods are given below) within the project impact area will be interviewed, active communication will be maintained throughout the construction phase, with the mukhtars approved, separate Whatsapp groups are established for each district and active communication is ensured.

Before the Public Participation Meetings, meetings held with the neighborhood headmen of each district in Alanya, Manavgat and Serik districts, and information was given about both the project and the public participation meetings.

The WhatsApp groups with Muhtars are been used to inform about the meetings, monitoring the complaint boxes and unexpected developments.

V.2. Specific Communication Strategies

Neighborhoods:

Antalya/Serik: Yukarıkocayatak, Aşağıkocayatak, Kayaburnu, Çandır, Aşağıçatma, Burmahancı, Cumalı, Üründü, Deniztepesi, Sariabalı, Belpınarı, and Dikmen neighborhoods

Antalya/Manavgat: Çakış, Taşağıl, Gündoğdu, Hocalar, Yavrudoğan, Çolaklı, Seki, Kalemler, Evren, Ilica, Yeniköy, Şişeler, Evrenleryahşi, Dolbazlar, Yukarıışıklar, Dikmen, Bucakşeyhler, Ulukapı, Aşağıışıklar, Demirciler, Karaöz, Aksaz, Hacıali, Cevizler, Sülek, Hacısalı, Hacıobası, Kızılot, Uzunlar, Kadılar, Örenşehir, Yalçıdibi, Odaönü, Karakaya

Antalya/Alanya: Alara, Çakallar, İncekum, Avsallar, Akdam, Türkler, Payallar, Emişbeleni, Toslak, Telatiye (Konaklı), Elikesik

Table V-2. Serik- Merkez Neighborhood

Category	Details
Target Groups	Local women, refugee women (especially Syrians), elderly residents, small-scale farmers
Identified Barriers and Risks	Women have limited access to formal consultation mechanisms, language barriers (Arabic speakers), time limitations due to domestic responsibilities, and discomfort attending mixed-gender meetings
Recommended Meeting Frequency	Every 3 months during the construction phase
Suggested Venue	S.S. Serik Boğazkent Women's Initiative Production and Business Cooperative or another trusted, central, and accessible space for women such as a municipal social center
Suggested Time	Weekday mornings (e.g., 10:00–11:00) or early afternoon for increased flexibility
Pre-Meeting Notification Method	Physical announcements (posters) at mukhtar offices, women's cooperative, and local grocery stores Bilingual printed materials (Turkish–Arabic) to reach refugee women Coordination with NGOs experienced in refugee engagement and women participation
Suggested Partners 	S.S. Serik Boğazkent Women's Cooperative Serik Municipality's Women and Family Services Unit Local NGOs working with refugee or displaced populations (e.g. Refugees Association, SGDD-ASAM if active locally)

Table V-3. Manavgat- Taşgöl Neighborhood

Category	Details
Target Groups	Women, elderly, low-income households, informal agricultural workers
Identified Barriers and Risks	Strong gendered norms discourage women's active participation; women may perceive they are not allowed or not qualified to speak; informal workers lack official channels to express concerns
Recommended Meeting Frequency	Every 3 months, especially before and after major project milestones
Suggested Venue	Municipal social hall, women's training center (if any), or a local school building temporarily adapted for community meetings
Suggested Time	Mid-morning or early afternoon (when domestic obligations are lower)
Pre-Meeting Notification Methods	Leaflets/posters in Turkish displayed at local market, health centers, mosque entrance, and mukhtar's Office Mosque loudspeaker announcements coordinated with the mukhtar Verbal reminders during market days or in front of local bakeries Tea/snack service and seating arrangement that reduces formality Any active women-led cooperatives or school-parent associations (if discovered later)

Table V-4. Manavgat- Kalemli and Hacısali Neighborhoods

Category	Details
Target Groups	Women, elderly, subsistence farmers, seasonal workers
Identified Barriers and Risks	GBV/SEAH risks due to incoming male construction workers Literacy barriers, especially among elderly women

Category	Details
Recommended Meeting Frequency	Every 3 months, especially in coordination with seasonal work cycles i.e. April-May
Proposed Meeting Venue(s)	Local school building, Open-air gathering space (market place)
Notification Methods (Pre-Meeting)	<ul style="list-style-type: none"> • Mosque loudspeaker announcements coordinated with the mukhtar • Printed flyers distributed at local markets and shops • Word-of-mouth through health workers or midwives • WhatsApp messages forwarded via local grocery shop owners
Suggested Partners	<ul style="list-style-type: none"> • Mukhtar's office • Local schoolteachers or volunteers • Community health workers or nurses • Religious leaders or imams (to increase neutrality and reach)

Table V-5. Alanya- Toslak and Konaklı Neighborhoods

Category	Details
Target Groups	Refugee/migrant women (Arabic speakers), seasonal workers, low-income families, elderly
Identified Barriers and Risks	<ul style="list-style-type: none"> • Language barrier (Arabic speakers with limited or no Turkish) • Limited mobility for women due to social norms and safety concerns • GBV and SEAH risks related to incoming male labor force
Recommended Meeting Frequency	Every 3 months; more frequently during peak construction or labor influx periods
Proposed Meeting Venue(s)	Local school building, Open-air gathering space (market place)
Notification Methods (Pre-Meeting)	<p>Bilingual flyers (Turkish–Arabic) distributed at grocery shops, mosque entrance, and via female market vendors</p> <p>Mosque loudspeaker announcements coordinated with the mukhtar</p> <p>In-person outreach by social workers, local women representatives, or trusted Arabic-speaking NGO staff</p> <p>Door-to-door info sharing by female CLO or female municipal outreach staff</p>
Suggested Partners	<ul style="list-style-type: none"> • Municipality's Women and Family Services • Local Arabic-speaking outreach volunteers • NGOs working with refugee/migrant communities (e.g. ASAM, IBC, CARE if present) • Local health unit or midwife, local female health staff network

Table V-6. Serik- Çandır, Aşağıkocayatak and Kayaburnu Neighborhoods

Category	Details
Target Groups	Yörük families (especially women), agricultural workers, elderly residents
Identified Barriers and Risks	<ul style="list-style-type: none"> • Seasonal mobility due to Yörük transhumance (yayla migration) • Low formal education and digital connectivity • Limited visibility of women in public consultation processes • Male-dominated decision-making structures • Safety concerns during yayla migration especially for women
Recommended Meeting Frequency	Twice per year: once before migration (spring) and once after return (early autumn) Also, every 3 months for stayers
Proposed Meeting Venue(s)	<ul style="list-style-type: none"> • Mukhtar's garden or shaded outdoor space • Mosque courtyard (off-prayer hours) • Nearby school building or mobile tent

Notification Methods (Pre-Meeting)	<ul style="list-style-type: none"> • Personal outreach via mukhtar and Yörük elders (aksakallar) • Announcements via mosque and village gatherings • Informal visits by community liaison team a few days before the meeting • Verbal invitation delivered through animal feed sellers or shepherds' network • Women-to-women verbal invitations via relatives
Suggested Partners	<ul style="list-style-type: none"> • Mukhtar and community elders • Local agricultural cooperatives • Nomadic family associations (if any) • Female outreach staff or locally respected women (e.g., imam's wife, elder women)

Special communication channels may need to be developed for some disadvantaged groups. Different disadvantaged groups can be targeted through home visits or phone calls for individuals who cannot leave their homes; visually oriented leaflets and phone calls for illiterate individuals; leaflets and posters in different languages.

Among the vulnerable groups potentially affected by the Project are nomadic Yörük families, refugee/migrant women, the elderly, subsistence farmers, and seasonal workers, all of whom face various social, cultural, and economic barriers.

The seasonal migration patterns of the Yörük communities make it difficult for them to access information meetings, while women's participation in public consultation processes is often limited by traditional gender norms. Therefore, it is planned to hold at least two information meetings annually-before and after migration-and to organize these meetings in familiar community spaces such as the village head's (mukhtar's) yard, mosque courtyards, or mobile tents. The notification process will be conducted through mukhtars, community elders, herder networks, and verbal communication among women. Additionally, mobile teams will visit highland settlements (yaylas), safe transportation support will be provided for women, and female CLO will be actively involved in the process.

For refugee and migrant women, the main barriers identified are language limitations, restricted mobility, and the risk of gender-based violence (GBV/SEAH). Meeting announcements will be made via bilingual Turkish-Arabic-Kurdish brochures, and face-to-face outreach will be carried out by trusted local Arabic-speaking actors. In addition, special consultation sessions for women will be organized, focus group discussions with interpreter support will be held, and mobile support teams and psychosocial assistance mechanisms will be introduced to address SEAH risks.

Among elderly individuals and low-income women, low literacy rates and traditional norms that discourage women from speaking publicly reduce active participation. Therefore, meetings are already planned to be held in the late morning or near noon, with tea/snack services provided to create an informal and welcoming atmosphere. In addition to brochure distribution, home visits will be conducted. Furthermore, to increase women's participation, neighborhood-based mini women's advisory groups will be established and regular women-only information sessions will be organized.

A common challenge for all these groups is the hesitancy and distrust related to accessing grievance and feedback mechanisms. Therefore, it is essential to enhance awareness of the Grievance Mechanism (GM), with installed locked complaint boxes to allow for anonymous submissions, and introduce female CLO members who handles complaints submitted by women. Additionally, it is recommended to display simplified visual explanations of the grievance process, including the follow-up, resolution, and feedback loops, on community bulletin boards.

V.3. Operation Phase Community Engagement Plan (Post-Construction)

The stakeholder engagements developed during the construction process will be used effectively both in terms of public participation and authorized institutions, like NGOs and trade unions, and the communication and relations will continue to be used during the operation phase.

Table V-7. Operation Phase Focus Category

Category	Operation Phase Focus
Communication Objective	Ensure that vulnerable community members (women, elderly, children, pastoralist groups) are informed and can provide feedback on operational impacts such as traffic safety, access restrictions, and long-term social concerns.
Frequency of Communication	Twice per year (at minimum): Spring (prior to tourism and migration season) Autumn (after peak seasonal activity) Additional ad-hoc meetings in case of complaints or operational disruptions.
Communication Methods	Posters and flyers at local hubs (muhtar, mosque, health centers) WhatsApp messages and voice notes via community focal points Public information sessions when relevant (e.g., new signage, access road changes) Mobile info team visit once a year per settlement (if available)
Ongoing Risks / Key Topics	Road safety (especially for children, elderly, school routes) Access to agricultural land for women and small farmers Yörük livestock migration coordination and crossing points Street lighting needs in isolated or unlit areas Gender-based violence (GBV) risks around roadside zones Bus stop placements and pedestrian safety for women and elderly
Feedback & Grievance Channels	Maintain grievance redress mechanism (GRM) Add suggestion box in local gathering points (especially for women) Use female CLO or trusted female intermediary for verbal reporting
Partners and Outreach Actors	Mukhtar offices School teachers and health workers Local women's cooperatives Elder women or pastoralist representatives Municipal transport and safety units

V.4. Schedule and Timetable

The method, timing and form of activities for stakeholder engagement activities given in the previous section are detailed in Table V.1 .

In addition to this SEP, the RAP prepared for the Project separately includes a detailed Stakeholder Engagement Action Plan for RAP disclosure and implementation phases, which will be implemented in alignment with this Project SEP.

VI. ROLES AND RESPONSIBILITIES

The anticipated activities in the SEP will be conducted and completed by Project Company and KGM. In activities such as the grievance mechanism, Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. will be responsible for following requests, suggestions and complaints, and in the upcoming process, AAOİAŞ will fulfil the requirements by being responsible for this mechanism in accordance with the IFC PS1, EPFI Principle 5 and Principle 6.

The implementation of this SEP will be conducted and monitored by Project Sponsor’s Environmental and Social Manager who is responsible to appoint the Social Chief and the Environment and Social Deputy Manager to be responsible for the stakeholder engagement for the Project, implementation of this SEP and grievance management. The Social Chef and the Environment and Social Deputy Manager will perform the following functions:

- Information disclosure and obtaining feedback;
- Processing, managing and tracking grievances, including ensuring timely responses to and closure of grievances;
- Control over the implementation of the corrective actions to remedy grievances;
- Regular review and if necessary, update of the SEP and stakeholder engagement mechanism to ensure it is effective and reflects Project circumstances;
- Participation in discussion on responses and the resolution of disputes, and
- Assistance in the preparation of the Environmental and Social Performance Reports.

Depending on the complexity of issues, Project Sponsor’s project management and experts of KGM may also be involved.

VII. GRIEVANCE MECHANISM

VII.1. Purpose of the Grievance Mechanism

The purpose of this mechanism is to establish a system for handling, evaluation and resolution of all kinds of internal and external grievances, concerns, queries and proposals of the affected communities and other stakeholders, such as construction workers, regarding the project activities.

Managing grievances, including avoiding and minimizing them as well as effective handling, is an integral part of a sound stakeholder engagement strategy. Experience shows that significant numbers of grievances arise from misunderstandings, and that such grievances can be avoided, or their numbers reduced, through proactive and consistent engagement with communities. Engagement also helps anticipate and review community concerns to prevent them from escalating into grievances.

In accordance with IFC PS 2 and EPFI Principle 6, a process is established by which people who deem that they have been adversely affected by the Project during planning, construction or operation can bring grievances to the Project for consideration and, if required, resolution. A specific Project grievance mechanism (GM) is beneficial in addressing community and individual concerns and complaints before they escalate beyond control.

VII.2. Responsible Stakeholders

Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. is responsible for implementing the grievance mechanism during the land preparation and construction and operation phases. AAOİAŞ has to ensure that the grievance mechanism is implemented effectively.

Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. Community Liaison Officers (CLOs), under the supervision of the Social Chief and Environment and Social Manager, are responsible for receiving and managing grievances, coordinating the actions to be taken for resolution, and keeping proper records. The Environment and Social Manager is responsible for compiling and reporting grievance-related information to the General Directorate of Highways (KGM).

VII.2.1. Grievance Mechanism at the National Level

Presidency's Communication Centre:

The Presidency's Communication Centre (CIMER) provides a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER only allow applications in Turkish. Contact details of CIMER are given in Table VII.1 .

Through CIMER, applicants can direct their requests directly to the relevant authorities. The requests submitted to CIMER are resolved within 30 days. If the applicants do not receive feedback within this period, they can re-submit their grievance to CIMER or elevate it to the Ombudsman Institution (www.ombudsman.gov.tr).

Table VII-1. Contact Details of CIMER

Webpage:	www.CIMER.gov.tr/ www.turkiye.gov.tr/
Call Centre (hotline):	150
Phone number:	+90 312 590 20 00
Fax number:	+90 0312 473 64 94
Official Letter/Petition:	Republic of Türkiye, Directorate of Communications T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe/ Ankara
Individual Application:	Community relations desks at governorates, ministries and district governorates.

CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Foreigners Communication Centre:

The Foreigners Communication Centre (YIMER) provides a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities. Contact details of YIMER are given in Table VII.2 .

Table VII-2. Contact Details of YIMER

Webpage:	www.YIMER.gov.tr
Email:	YIMER@goc.gov.tr
Call Centre (hotline):	157
Phone number:	+90 312 515 11 22
Fax number:	+90 312 920 06 09
Official Letter/Petition:	Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ Ankara
Individual Application:	Republic of Türkiye General Directorate of Migration Management

VII.2.2. Community Grievance Mechanism at the Project Level

The main aim of the community grievance mechanism is to assist in resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM is intended to serve as a mechanism to:

- Allow identification and impartial, timely and effective resolution of issues affecting the project,
- Strengthen accountability of the beneficiaries, including project-affected stakeholders, and,
- Provide channels for the stakeholders to provide feedback and raise concerns.

External stakeholders can initiate the grievance/comment mechanism by using the following methods:

- Grievance/comment boxes and forms have been placed in public places including places commonly/ comfortably visited by women)
- Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. chiefs/ managers, CLOs)
- CLO's contact numbers have been shared with the mukhtars and also information leaflets have been hanged in each neighborhood sharing the contact information of the CLO's.
- E-mail (the e-mail address for the submittal of grievances/comments have been shared with the local communities.
- Website (with the anonymous option)

On the website of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. there is a Contact page which is available in Turkish and English (<https://www.antalyaalanyaotoyolu.com.tr/>). The grievances/requests related to Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş activities can be communicated through this page and the resolution process is followed. The page includes information on email, phone number and mailing address of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. Name e-mail address, telephone number and explanation/message/grievance could be entered in the online platform. Notification that the application has been received is made via e-mail address.

If the grievance/comment holder would like to fill out the form Annex-1 anonymously, the form will allow the grievance/comment holder to file it without any personal contact information. For grievances/comments received verbally in person, the Project representatives will request the grievance/comment holder to fill in the form himself/herself by providing the required guidance, where necessary. If the grievance/comment holder wishes the form to be filled out by the Project representatives, they will fill the form on behalf of the grievance/comment holder. In such cases, the grievance/comment holder will be required to read the filled form and both the grievance/comment holder and the Project representative who filled in the form will be required to approve and sign the form. The Project representative will provide a copy of the filled form to the grievance/ comment holder stakeholder. The CLO will ensure that the grievance/comment forms are collected from the grievance/comment boxes weekly.

Grievance boxes and information leaflets were placed in all affected neighborhoods at mukhtar's offices and the installation have been completed. An example of the installed grievance mechanism is shown in Figure VII.1.



Figure VII-I The Grievance Box and Information Leaflets at Mukhtar’s Office

The office in Serik, where the address is written, also works as an information office: ORTA, BELEK CADDESİ, NO: 7, İÇ KAPI NO: 9 SERİK/ANTALYA. The temporary construction site can also be used as an information office.

Within the scope of the project, Community Liaison Officers (CLOs) started to work within SPV. In addition, a call center has been established and can be reached at 0850 202 07 07.

The roles and responsibilities of Community Liaison Officers (CLOs) are presented in Table VII.3.

Table VII-3. Roles and Responsibilities of the Community Liaison Officer (CLO)

Role	Responsibilities
Community Liaison Officer (CLO)	<ul style="list-style-type: none"> • Inform the public about the scope, progress, and potential impacts of the Project. • Organize and facilitate regular community meetings, focus group discussions, and engagement forums. • Maintain open communication channels with project-affected persons (PAPs), community leaders, and local institutions. • Develop and distribute communication materials tailored to various community audiences. • Ensure that all internal and external complaints, including those under the Stakeholder Engagement Plan (SEP), are managed in line with the Grievance Mechanism (GM). • Log, track, and resolve complaints and appeals in a timely and respectful manner. • Provide regular training to site personnel during the construction phase. • Conduct regular internal audits and report non-conformities. • Ensure that non-conformities are recorded and promptly addressed. • Participate in the development and follow-up of corrective and/or improvement actions. • Report on the implementation performance of this Plan. • Support the review and update processes of this Plan. • Ensure that lessons learned and field experiences are reflected in plan revisions and training updates. • Collaborate with Health & Safety (H&S) and Social teams to address cross-cutting issues. <ul style="list-style-type: none"> • Facilitate resolution of community disputes or concerns related to project activities. • Assess how vulnerable or marginalized groups may be affected by the Project.

Role	Responsibilities
	<ul style="list-style-type: none"> • Propose mitigation measures or tailored engagement approaches for at-risk or underrepresented populations. • Ensure equitable participation in consultation processes, particularly for women, youth, elders, and people with disabilities. • Support the monitoring and recording of the implementation of the social related issues, including activities carried out by subcontractors. • Support the evaluation of the SEP's implementation performance and community feedback • Contribute to regular internal audits and the reporting of non-conformities. • Ensure that relevant non-conformities are recorded and addressed immediately. • Participate in the development of corrective and/or improvement actions and support their follow-up. • Support the periodic review and update of the SEP and related procedures in coordination with the E&S Manager. • Provide input to lessons learned from engagement outcomes and grievance trends. • Maintain up-to-date records of all stakeholder meetings, grievances, resolutions, and community commitments. • Submit routine reports to the Social Chief and/or E&S Manager summarizing community feedback, grievance status, and engagement Milestones. • Ensure confidentiality and proper data handling, especially for sensitive community issues.
<p>Social Chief</p>	<ul style="list-style-type: none"> • Supervise and mentor CLOs, ensuring their work aligns with project priorities and stakeholder engagement strategy. • Develop and implement work plans and schedules for the CLO team. • Ensure consistent messaging, processes, and reporting methods across all field teams. • Conduct regular team meetings to review community issues, grievances, engagement outcomes, and field updates. • Lead the implementation of the Stakeholder Engagement Plan (SEP) and ensure it reflects community realities. • Oversee the planning and execution of community consultations, public meetings, and disclosure activities. • Ensure that engagement activities are inclusive of vulnerable and marginalized groups. • Build and maintain positive, trust-based relationships with local communities, leaders, and institutions. • Supervise the effective functioning of the grievance mechanism (GM) at community and project levels. • Ensure all grievances are recorded, processed, and resolved in a timely and transparent manner. • Analyse grievance trends and escalate systemic issues to the E&S Manager. • Contribute to the continuous improvement of the GRM process based on community feedback and internal review. • Monitor the performance of social engagement activities and their compliance with SEP objectives. • Ensure accurate, timely, and complete reporting of CLO activities, stakeholder interactions, and grievance outcomes. • Review and validate weekly/monthly reports from CLOs and prepare consolidated updates for senior management. • Ensure all engagement activities meet national regulations and international standards (e.g., IFC PS, Equator Principles). • Identify training needs and deliver or coordinate training for CLOs on stakeholder engagement, conflict resolution, and field documentation. • Promote professional development and capacity building within the social team. • Train subcontractors and relevant staff on community interaction protocols and grievance management. • Contribute to the development, review, and periodic updating of the SEP and related social management plans. • Ensure CLOs support the implementation and documentation of these plans at the field level. • Support the integration of lessons learned into updated plans and engagement strategies. • Coordinate with the E&S Manager, E&S Specialists, H&S, legal, and construction teams to address community-related impacts.

Role	Responsibilities
	<ul style="list-style-type: none"> • Support alignment between community concerns and project execution through proactive communication with technical departments. • Contribute social performance inputs to reports for lenders, regulators, and corporate leadership.

The Community Liaison Officers (CLOs) appointed within the Project hold undergraduate and/or postgraduate degrees in disciplines such as sociology, social policy, public relations, and other social sciences. With both strong academic backgrounds and practical experience, they significantly contribute to the effective implementation of environmental and social management processes. In total, three experts are expected to undertake the role of CLOs within the scope of the Project. The CLOs work under the supervision of the Social Chief, who has extensive experience in stakeholder engagement, coordination with local NGOs and public institutions, gender-sensitive approaches, and the implementation of social development and awareness-raising initiatives in line with national legislation and IFC Performance Standards.

In addition to meeting the above-mentioned qualifications, the current CLOs also possess practical knowledge of social performance management in accordance with World Bank and IFC standards. These experts play an active role in areas such as social impact management, establishment and monitoring of grievance mechanisms, stakeholder engagement processes, gender-sensitive approaches, field research, reporting, and communication. Their key competencies include reporting, problem-solving, leadership, data processing with SPSS, engaging with communities, expertise in child and women’s rights programs, and compliance with relevant national and international regulations.

Furthermore, the experts have completed various training and certification programs in areas such as “Community Engagement and Gender-Based Violence Prevention,” “Stakeholder Engagement,” “Digital Literacy,” “Family Counseling,” “NLP,” and “Play Therapy,” thereby enhancing their professional skill sets. The Social Chief has also received adequate training in handling sensitive grievances, ensuring that such cases are managed with professionalism, confidentiality, and care.

In addition to the Project-level Grievance Mechanism, affected people may also raise concerns regarding the Project’s compliance with AIIB’s Environmental and Social Policy through the *AIIB Project-affected People’s Mechanism (PPM)*.

The PPM provides an independent and impartial channel for project-affected people to submit complaints if they believe they have been, or are likely to be, adversely affected by AIIB-financed projects. Complaints can be submitted in writing, by email, or online through AIIB’s official website.

Information about the PPM, including submission procedures and contact details, will be made available to local communities through the regular community meetings held monthly and through printed materials (e.g. grievance mechanism brochures, notice boards).

Complaints can be submitted online via the official PPM webpage <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism>, by email to ppm@aiib.org, or in writing to the following address:

Managing Director, Complaints-resolution, Evaluation & Integrity Unit (CEIU)
 Asian Infrastructure Investment Bank (AIIB)
 Tower A, Asia Financial Center, No. 1 Tianchen East Road,
 Chaoyang District, Beijing 100101, People’s Republic of China

Detailed information on the PPM’s procedures, submission form, and eligibility criteria is available on the AIIB website. Affected people are generally encouraged to first utilize the Project’s community grievance mechanism before contacting the AIIB, unless there are valid reasons to believe that doing so would be ineffective or unsafe.

VII.2.3. Worker’s Grievance Mechanism

The main aim of the worker’s grievance mechanism is to ensure that all project workers have access to a fair, transparent, and accessible process for raising and resolving workplace-related concerns in a timely, effective, and confidential manner. The worker’s grievance mechanism is intended to:

- Enable workers to raise employment-related concerns, complaints, or suggestions and ensure their impartial, timely, and effective resolution,
- Promote accountability of the employer and management towards fair treatment and workplace rights,
- Provide clear channels for workers to safely provide feedback and report issues without fear of retaliation.

Workers who report violations such as forced labor, mistreatment, or wage exploitation within the scope of the Project shall be protected against any form of retaliation in line with IFC Performance Standard 2 and IFC’s Good Practice Note: Addressing Risks of Retaliation Against Project Stakeholders (2021). To this end, the grievance mechanism is designed to allow for anonymous submissions. Workers will be able to submit grievances safely either through anonymous online forms available on the Project website or via locked complaint boxes installed at the Temporary Const. Site, Viaduct 4, Viaduct 8, T-5 Entry, Viaduct 12, and in HRM32 - Registered Archaeological Site. As part of this process, the Internal Grievance Form provided in Annex-2 will be used to ensure that complaints are collected and evaluated in a standardized format. Additionally, the procedural steps established for the grievance mechanism will apply to both internal and external complaints (Table VII.5). In addition, workers may submit their grievances and feedback by calling the toll-free line 0850 202 07 07 or by visiting the Information Office.

During the grievance review process, the identity of the complainant will remain strictly confidential and will be stored in encrypted systems accessible only to designated Community Liaison Officers (CLOs), and will not be shared with other managers under any circumstances. Meetings related to sensitive issues will be conducted exclusively by authorized social specialists, in private and secure settings, to ensure the safety and privacy of the complainant. Any adverse actions taken against a complainant following the submission of a grievance - such as reassignment, wage deduction, intimidation, or exclusion - will be treated as retaliation. In such cases, disciplinary proceedings will be initiated against the responsible individuals, and contracts with subcontractors may be suspended or terminated if necessary. The effectiveness of these procedures will be monitored by CLOs, and any potential retaliation incidents following grievance submissions will be tracked, documented, and reviewed.

VII.2.4. Gender-Sensitive Accessibility to the Grievance Mechanism

To ensure equitable access to the Grievance Mechanism (GM), gender-specific challenges have been identified across affected communities in Serik, Manavgat, and Alanya. Women, especially those in rural or conservative settings, often face social, mobility, and communication barriers that limit their ability to file formal complaints.

Barriers identified include:

- Limited mobility due to unpaid care work and household responsibilities
- Lack of awareness of complaint channels, particularly among refugee or elderly women
- Discomfort speaking in male-dominated spaces or to male project staff
- Low literacy or digital skills
- Cultural norms discouraging women from voicing dissatisfaction publicly

Table VII-4. Gender-Sensitive Accessibility to the Grievance Mechanism

Measure	Description
Female CLOs or trusted intermediaries	Women will have the option to submit grievances through female liaison officers or locally respected women (e.g., women cooperative members or mukhtar's wife)
Anonymous feedback channels	Lockable complaint boxes in women-accessed locations (e.g., cooperatives, health centers) and verbal relay via trusted mediators
Outreach using local networks	Use of female-focused WhatsApp groups and word-of-mouth messaging to raise awareness of the GM
Language support	Bilingual grievance forms (Turkish and Arabic) for refugee women in areas like Serik and Toslak
Verbal grievance intake	Women will be allowed to submit complaints orally, especially in low-literacy or elderly populations (e.g. Kalemler, Hacısali)
Culturally appropriate meeting spaces	Women-only consultation sessions where grievances and concerns can be voiced safely and privately
Communication Line	A separate hotline will be set up for women, and it will be explained through CDCs and leaflets that the person answering the phone is a woman and will listen to complaints anonymously, without prejudice or comment, and that complaints will be recorded according to the request

Table VII-5. Procedural Steps of Grievance Mechanism

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	There exist two Grievance Mechanism at the National Level: <ul style="list-style-type: none"> • Presidency's Communication Centre and • Foreigners Communication Centre 	-	Presidency's Communication Centre, and Foreigners Communication Centre and related authorities, CLO
Grievance uptake	Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • Telephone • Verbally • E-mail • Website • Grievance/comment boxes • Letter to Grievance focal points at local facilities Complaint form to be logged via any of the above channels <ul style="list-style-type: none"> • Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box Anonymous Grievances can be submitted via the following channels: <ul style="list-style-type: none"> • Telephone • Letter to Grievance focal points at local facilities • Grievance box in headman's office and the camp sites • Website 	CLO must open grievance boxes every week during the construction phase and every 30 working days during the operational phase	CLO
Sorting, processing	Any complaint received is forwarded to Environment and Social Manager and SPV General Manager, Logged in the Grievance	Within 3 business days of receipt	CLO

Step	Description of Process	Time Frame	Responsibility
	Log, and categorized according to the complaint types ² : If the complaint is assessed to be out of the scope of the Grievance Mechanism, a grievant will be notified through the desired communication method and an alternative mode of solution will be suggested.		
Acknowledgement and follow-up	Receipt of the grievance is acknowledged to the complainant by CLO through a personal meeting, phone call or letter as appropriate, within a target of 3 business days after submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant.	Within 3 business days of receipt	CLO
Verification, investigation, action	Investigation of the complaint is led by Environment and Social Manager and SPV General Manager. The SPV General Manager is notified of Level 1, 2 or 3 grievances. The Social Chief, as appropriate, support the Environment and Social Manager in deciding who should deal with the grievance and determines whether additional support for the response is necessary. A proposed resolution is formulated by Social Chief, as appropriate, supports the Environment and Social Manager and is communicated to the complainant by CLO through the grievance/comment close-out form.	Responses within 30 business days of receipt	SPV General Manager, E&S Manager, Social Chief, Community Liaison Officers
Monitoring and evaluation	Data on complaints are collected in a database and reported to SPV General Manager, Environment and Social Manager and AAOİAŞ HQ every three months	Quarterly	CLO

² Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc.).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

Step	Description of Process	Time Frame	Responsibility
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by CLO through phone calls or face-to-face interviews.	15 business days after the implementation of the resolution	CLO

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse including the right of petition, right to information and appeal to the ombudsperson (constitution, article 74) and right to constitutional complaint (constitution, article 148).

In addition to the project's GM for its internal and external stakeholders, EP 6: Grievance Mechanism requires the establishment of a Workers' Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. The Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees).

Any comments or concerns will be brought to the Company's attention verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form is available on the Company website, at the Project site, at the mukhtar's office, alongside a description of the grievance mechanism. All grievances will be:

- Acknowledged within seven days after receipt;
- Responded no later than within 30 business days after receipt, and
- Specifically, nominated and trained members of staff will record grievance information in a grievance register. The information in the grievance register will include Stakeholder name and contact details and details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

Individuals can request the right to have their names kept confidential, and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

- Step 1: Receipt of grievance and registering of grievance (3 business days),
- Step 2: Assessment,
- Step 3: Acknowledgement of grievance (acknowledged within 3 business days after receipt),
- Step 4: Investigation and resolution of grievance,
- Step 5: Closure; and (3 0 business days)
- Step 6: Outcome of the corrective action (15 business days after completion).

Appeals Committee

In case the complainants are not satisfied with the decision of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş and/or EPC on their complaints, they can refer to the Appeals Committee via Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş social impact team.

Appeals Committee consisting of Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş management teams is responsible for ensuring grievance mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

The mandate of the Appeals Committee covers considering complaints on the issues listed below (excluding those related with Labor Law and Expropriation Law):

- Unsolved grievance related to damage to environment,
- Unsolved grievance related to damage to public assets and infrastructure,
- Unsolved grievance related to damage to private assets (land, crops, houses etc.),
- Unsolved grievance related to impacts on livelihood.

The Appeals Committee carries out the following tasks:

- Meeting at least once a month or more often depending upon the existence of unresolved disputes,
- Reviewing the complaints by hearing both complainants and LİMAK and/or EPC
- Investigating the complaints in accordance with project requirements, LİMAK Policies, legal framework and referring to relevant expertise where required,
- Preparing an evaluation report based on the inquiries,
- Making a proposal on resolution of the disputes between parties.

The decision of the Appeals Committee is not binding and if parties do not agree on the Appeals Committee proposal, they still have the opportunity to either negotiate or litigate.

The Appeals Committee consists of the following members:

- SPV General Manager
- Health and Safety Manager
- Environment and Social Manager
- Expropriation Manager
- Social Chief
- Community Liaison Officer
- Matter Expert, if required
- Relevant NGO officer or village leaders

The grievance mechanism will be widely announced to the public with stakeholder meetings held for project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism that also allows anonymous grievances. The grievances will be reviewed by the team according to the Project human rights and grievance mechanism.

The relationships developed through effective stakeholder engagement activities and the involvement of local organizations in the appeals committee will reduce concerns about objectivity and ensure a more transparent process for the grievance mechanism and the right to appeal.

Rules and Procedures of the Appeals Committee

1. Purpose and Scope

This manual outlines the procedures and operating rules of the Appeals Committee established under the grievance mechanism of the Antalya-Alanya Motorway Project. The purpose of the Appeals Committee is to ensure an effective, transparent, and fair review of grievances that remain unresolved or are not accepted by the complainant after the initial resolution process.

The Committee is responsible for investigating grievances that fall under its mandate, ensuring alignment with project policies, applicable legislation, and international environmental and social standards.

The Appeals Committee shall consider complaints unresolved by Antalya Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş and/or EPC, specifically on the following issues (excluding matters under Labor Law or Expropriation Law):

- Environmental damage
- Damage to public assets and infrastructure
- Damage to private property (land, crops, houses, etc.)
- Impacts on livelihood

2. Committee Structure and Responsibilities

The Appeals Committee includes the following members:

- SPV General Manager (Chair)
- Health and Safety Manager
- Environment and Social Manager
- Expropriation Manager
- Social Chief
- Community Liaison Officer
- Subject Matter Expert (as needed)
- Representative of local NGOs or village leadership

The Committee may invite additional stakeholders or technical advisors as needed, based on the nature of the grievance under review.

The Committee is responsible for the following tasks:

- Reviewing unresolved or escalated grievances submitted via the Social Impact Team.
- Ensuring complainants are heard fairly and respectfully.
- Conducting investigations in line with project requirements, legal frameworks, and LİMAK Group's environmental and social policies.
- Seeking input from technical experts and community representatives where appropriate.
- Developing reasoned proposals to resolve disputes.
- Preparing detailed evaluation reports for each reviewed grievance.

3. Implementation

- Appeals must be submitted to the CLOs, which will forward them to the Appeals Committee Secretariat.
- Appeals are logged, assigned a case number, and acknowledged within 5 working days.
- The Committee shall meet at least once a month, or more frequently if required by the number or urgency of unresolved grievances.
- The Committee verifies the grievance falls under its mandate.
- Both the complainant and the project/EPC representatives are given the opportunity to present their perspectives.
- The Committee may conduct site visits, consult experts, and review relevant documentation.
- Committee members engage in internal review processes in a confidential manner and aim to reach decisions through consensus wherever possible."
- A written resolution proposal is shared with both parties within three (3) business days following the Committee meeting.
- The grievance case documentation, including the Committee's findings, rationale, and resolution recommendations, is securely archived and integrated into the project's grievance monitoring and reporting system.
- All Committee members shall maintain strict confidentiality.
- Any member with a potential conflict of interest must recuse themselves from the specific case.
- The effectiveness of the Appeals Committee and its procedures will be reviewed annually.
- Lessons learned will be incorporated into future updates of this manual and SEP revisions.

Grievances Related GBV/SH/SEA

To properly address SEA/SH risks, the GM will be in place prior to contractors mobilizing. For GBV- and particularly SEA/SH-complaints, there are risks of stigmatization, rejection and reprisals against complainant. This creates and reinforces a culture of silence so complainant may be reticent to approach the project directly. To enable women to safely access the GM, multiple channels through which complaints will be registered in a safe and confidential manner will be enabled. These channels will be designed to respect privacy, ensure accessibility, and allow for anonymous reporting, using approaches such as - but not limited to - confidential verbal reporting, written submissions, or digital tools, depending on the local context and available resources. Anonymous submissions are accepted and processed with the same level of seriousness.

The Social Chef and CLO is ensure on how to collect SEA/SH cases confidentially and empathetically (with no judgement). Where possible, at least one female CLO shall be available to receive SEA/SH-related complaints.

The Project has multiple complaint channels. No identifiable information on the survivor will be stored in the GM and all data related to GBV/SH/SEA grievances will be handled and stored securely in accordance with applicable data protection laws and the AAOİAŞ's confidentiality policies. The GM will not ask for, or record, information on more than the following related to the SEA/SH allegation:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
- If possible, the age and sex of the survivor; and
- If possible, information on whether the survivor was referred to services.

In line with IFC's Good Practice Note: Addressing Risks of Retaliation Against Project Stakeholders (2021), the information in the GM will be confidential-especially when related to the identity of the complainants or witnesses. Any form of retaliation against individuals submitting GBV/SH/SEA grievances is strictly prohibited. Such actions may result in disciplinary measures for company personnel and, where applicable, appropriate contractual follow-up or escalation with third-party actors, including contractors and service providers.

Complainants will be informed about and referred to appropriate support services, such as medical care, psychosocial support, legal aid, or protection services. AAOİAŞ will maintain an up-to-date referral list of local service providers for this purpose.

GBV/SH/SEA grievances will be acknowledged within 3 business days and resolved as quickly as possible, with sensitivity to the emotional and physical needs of the Complainants. Complainants shall be informed of outcomes or steps taken, as appropriate and with their consent.

All GBV/SH/SEA grievances will be documented separately and securely, with access limited to authorized personnel. Non-identifiable summary data may be used for monitoring, evaluation, and reporting purposes only.

VII.3. MONITORING AND REPORTING

The SEP is a living document that will be updated periodically (at least annually) to document consultations conducted, issues raised, actions taken, and change materials. It will also include lessons learned, any modifications to the consultation process, and a schedule for ongoing future interaction.

VII.4. Internal Monitoring

The Project Sponsor will monitor the participation of the stakeholders in the planned engagement activities. Through the evaluation of outcomes and the effect of engagement, LİMAK intends to obtain regular feedback from stakeholders and to learn if the planned outcomes are achieved or if there is a need to change the approach.

Throughout the Project, Project Sponsor will communicate with stakeholders and inform them about any significant issues, such as changes in the Project schedule.

Monthly summaries/reports of grievances, queries, and related incidents, together with the implementation status of corrective/preventive actions, will be prepared by the CLOs and submitted to Environmental and Social Manager. The monthly summaries/reports will be a means to assess both the number and nature of complaints (if any), along with the Project Sponsor's ability to address complaints in a timely and effective manner.

During the operation phase, the Environmental and Social Manager will also prepare quarterly overall performance reports.

VII.5. External Monitoring

In addition to internal monitoring, external monitoring activities will be carried out quarterly- in the construction phase and biannually during the operation phase of the project by lenders IESC (ESAP monitoring experts) to verify environmental and social monitoring information and perform monitoring services.

As part of the external monitoring process, a final evaluation will be conducted to determine whether the implementation of the ESMS/ESMP complies with national environmental laws, international agreements, protocols, environmental and social standards such as the Equator Principle, IFC Policy (2012) and related Performance Standards on Environmental and Social Sustainability applicable to the Antalya-Alanya Motorway Project.

Besides, local authorities and the Ministry of Environment, Urbanization and Climate Change (MoEU) have the authority to execute monitoring and inspection activities to follow up on the conformity of the Project activities with the environmental requirements as per the relevant legislation.

VII.6. Phase-Differentiated Monitoring

Monitoring requirements differ between the construction and operation phases due to the evolving nature of impacts and stakeholder interactions.

During Construction Phase:

- **Indicators:**
 - Number and frequency of community consultations held
 - Percentage of women, elderly, and vulnerable groups reached
 - Number of grievances received and resolved within defined timelines
 - Occupational health and safety incidents reported and addressed
 - Number of disruptions to access/mobility and mitigations implemented
- **Methods:**
 - Site-level monitoring by social and environmental officers
 - Community feedback sessions and grievance intake
 - Weekly reporting by contractors

During Operation Phase:

- **Indicators:**
 - Road safety incident reports and follow-up actions
 - Long-term noise and air quality measurements
 - Accessibility improvements for vulnerable groups (e.g., crossings, lighting)
 - Continued functionality of grievance mechanism (response rate, satisfaction)
 - Periodic satisfaction surveys with local residents and road users
- **Methods:**
 - Bi-annual monitoring reports submitted to financing institutions
 - Independent audits and third-party verifications (if required)
 - Coordination with local authorities and CSOs for long-term oversight

VII.6.1.1. Vulnerability-Focused Monitoring

Special attention will be given to tracking how the project affects vulnerable groups identified in this HRA:

- Sex- and age-disaggregated data will be maintained for all engagement and grievance records.
- Gender-based violence (GBV) indicators will be tracked in coordination with local NGOs.
- Mobility/access concerns for the elderly and disabled will be assessed during site visits.

VII.6.1.2. Reporting and Disclosure

- Monitoring results will be disclosed in an accessible format (e.g., summary brochures, radio announcements, community meetings).
- Reports will be prepared in Turkish and, where relevant, simplified formats or visualized to ensure comprehension by illiterate or semi-literate populations.
- An annual Stakeholder Monitoring Summary will be shared with local authorities, community representatives, and the public.

This structured and adaptive monitoring and reporting system ensures transparency, learning, and responsiveness throughout the project duration.

VIII. ANNEXES

ANNEX-1 External Grievance Form

TALEP/ŞİKÂYET FORMU <i>REQUEST/COMPLAINT FORM</i>	
A- Genel Bilgi <i>General Information</i>	
Proje Adı <i>Project Name</i>	
Talep/Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Request/Grievance/ Feedback:</i>	
Talep/Şikayet/Geri Bildirimin Yapıldığı Tarih <i>Date of Request/Grievance/ Feedback Filed by the Grievance/ Feedback Holder</i>	
Talep/Şikayet/Geri Bildirimin Alınış Şekli (şikayet kutusu, yazılı sözlü ya da sözlü, istişareler sırasında) <i>Method of Request/Grievance/Feedback Receipt (Complaint box, written or Oral, through consultations)</i>	
B- Talep/Şikayet/Geri Bildirim Sahibi Hakkında Bilgi <i>Information about the Stakeholder who Lodged Request/Grievance/ Feedback Owner</i>	
Talep/Şikayet/Geri Bildirim Sahibinin İsmi (isteğe bağlı) <i>Name of Stakeholder who Lodged the Request/Grievance/ Feedback (optional)</i>	
Talep/Şikayet/Geri Bildirim Sahibinin Nereden Geldiği (Yerleşim, Şirket, vb.) <i>Origin of Stakeholder who Lodged the Request/Grievance/Feedback (Settlement, Company, etc.)</i>	
İletişim Bilgisi <i>Contact Information</i>	Tel: e-posta:
C- Talep/Şikayet/Geri Bildirim Hakkında Bilgi (talep/şikayete ilişkin detaylı açıklama) <i>Information on the Request/Complaint/Feedback (detailed description of the request/complaint)</i>	

TALEP/ŞİKÂYET FORMU <i>REQUEST/COMPLAINT FORM</i>	
A- Genel Bilgi <i>General Information</i>	
Proje Adı <i>Project Name</i>	
Talep/Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Request/Grievance/ Feedback:</i>	

ANNEX-2 Internal Grievance Form

İÇ TALEP/ŞİKÂYET FORMU <i>INTERNAL REQUEST/COMPLAINT FORM</i>	
A- Genel Bilgi <i>General Information</i>	
Proje Adı <i>Project Name</i>	
Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Grievance/ Feedback:</i>	
Talep/Şikayet/Geri Bildirimin Yapıldığı Tarih <i>Date of Request/Grievance/ Feedback Filed by the Grievance/ Feedback Holder</i>	
Talep/Şikayet/Geri Bildirimin Alınış Şekli (şikayet kutusu, yazılı sözlü ya da sözlü, istişareler sırasında) <i>Method of Request/Grievance/Feedback Receipt (Complaint box, written or Oral, through consultations)</i>	
B- Talep/Şikayet/Geri Bildirim Sahibi Hakkında Bilgi	
Şikayet/Geri Bildirim Sahibinin İsmi (isteğe bağlı) <i>Name of Stakeholder who Lodged the Grievance/ Feedback (optional)</i>	
Talep/Şikayet/Geri Bildirim Sahibinin Nereden Geldiği (Yerleşim, Şirket, vb.) <i>Origin of Stakeholder who Lodged the Request/Grievance/Feedback (Settlement, Company, etc.)</i>	
İletişim Bilgisi <i>Contact Information</i>	Tel: e-posta:
C- Talep/Şikayet Hakkında Bilgi <i>Information on the Request/Complaint</i>	
Şikayetin İlgili Olduğu Taraf (Şirket, Yüklenici, Altyüklenici, Üçüncü Taraf) <i>Relevant to Project Company, Contractor, Subcontractor, Third-party,</i>	

İÇ TALEP/ŞİKÂYET FORMU <i>INTERNAL REQUEST/COMPLAINT FORM</i>	
A- Genel Bilgi <i>General Information</i>	
Proje Adı <i>Project Name</i>	
Şikayet/Geri Bildirimi Alan Proje Personelinin İsmi <i>Name of the Project Personnel who Received the Grievance/ Feedback:</i>	
Talep/şikayete ilişkin detaylı açıklama <i>(detailed description of the request/complaint)</i>	

ANNEX -3 Key Performance Indicator

KPI	Target	Frequency	Responsible	Data Source
Number of meetings conducted with the relevant	1 per 30 km stretch	Semiannually / construction phase Annually / operational phase	CLO, E&S Manager	Meeting reports, photos
Number of regular community meetings held to disclose Project progress, E&S performance, and RAP implementation updates	Minimum 1 per month during construction; 1 per quarter during operation	Monthly / Quarterly	CLO, E&S Manager	Meeting minutes, attendance records, photos, feedback forms
% of meetings with at least one female facilitator	100%	Each meeting	CLO, Female Staff	Participant list
% of female participants in community meetings	At least 40% (if not separate female meeting will be conducted)	Semiannually / construction phase Annually / operational phase	CLO	Disaggregated participant data
Number of WhatsApp / digital announcements posted	Min. 2/month/region	Monthly	CLO	Screenshots, message logs
Number of grievances received from women	Separate tracking required	Monthly	Female CLO	GM logs
% of grievances resolved within 30 days	75%	Monthly	Environment and Social Manager	GM logs
Number of grievance channels accessible to illiterate or elderly PAPs	At least one in each sub-region (Serik, Manavgat, Alanya)	Ongoing	CLO	Field visits, GM audit
Number of GBV or SEAH trainings held	one per campsite before construction	Pre-construction	H&S Manager, Female CLO	Training logs
Number of engagement events for vulnerable groups (women, Yörüks, refugees)	Min. One per group per year	Annual	CLO, E&S Manager	Meeting records
Number of satisfaction surveys conducted (incl. gender focus)	2/year	Biannual	Female CLO	Survey results maintained by the SPV General Manager
% of brochures/materials with visual/auditory accessibility	90%	Before dissemination	E&S Manager, Social Chief	Outreach records
Increase women's participation in employment by 2029	30%	Annual (2029–2032)	SPV General Manager	Personnel records maintained by SPV General Manager
Increase women's participation in employment by 2032	35%	Annual (2032–2035)	SPV General Manager	Personnel records maintained by SPV General Manager

Increase women's participation in employment by 2035	40%	Annual (2035–2040)	SPV General Manager	Personnel records maintained by SPV General Manager
Maintain women's participation at Board level by 2035	40%	Annual (2029–2040)	SPV General Manager	Board composition records maintained by SPV General Manager

ANNEX-4: Project Information Brochure: Turkish, Arabic and Kurdish

Turkish Version

ÇEVRESEL ve SOSYAL ETKİ
DEĞERLENDİRMESİ (ÇSED) ÇALIŞMALARI

Antalya-Alanya Otoyolu Projesi kapsamında, Çevresel ve Sosyal Etki Değerlendirmesi (ÇSED) süreci başlamıştır. Proje'nin çevre ve sosyal hayat üzerindeki olası etkileri tespit edilmiş, değerlendirilmiş ve bu etkileri azaltmaya yönelik önlemler önerilmiştir.

Projeyi yürüten Antalya-Alanya Otoyolu İnşaat Yatırım ve İşletme A.Ş. (AAOİAŞ), bu çalışmayı yürütmek üzere ENCON Çevre Danışmanlık Ltd. Şti.'yi görevlendirmiştir.

Mevcut çevresel ve sosyal koşullar, Proje süresince göz önünde bulundurulmaya devam edilecektir.

ÇSED çalışmaları kapsamında detaylı olarak incelenen temel çevresel ve sosyal konular aşağıda özetlenmektedir:

- ✓ Mevcut arazi kullanımı ve gelir kaynaklarında bölgesel değişimler
- ✓ Gürültü ve hava kalitesinde yaşanabilecek değişiklikler
- ✓ İnşaat faaliyetleri nedeniyle oluşabilecek rahatsızlıklar
- ✓ İnşaat malzemelerinin temini ve atık bertarafı
- ✓ Yol ve trafik güvenliği ile ilgili konular
- ✓ Doğal habitatlar ile bu habitatlarda bulunan hayvanlar ve bitki örtüsü üzerindeki etkiler
- ✓ Kültürel miras açısından önemli yerler ve bilinmeyen arkeolojik kalıntıların keşif potansiyeli
- ✓ Kadınlar, yaşlılar gibi hassas gruplar öncelikli olmak üzere halkın yaşam koşullarının korunması
- ✓ Proje'nin yerel ekonomi, tarım ve geçim kaynakları üzerindeki etkileri
- ✓ Halk sağlığı ve güvenliği açısından oluşabilecek riskler ve alınacak önlemler

GÖRÜŞ BİLDİRME OLANAKLARI

Antalya-Alanya Otoyolu Projesi kapsamında yürütülen ÇSED süreci, projeden etkilenebilecek veya projeye ilgi duyan tüm kişi ve kurumların görüşlerini alma esasına dayanmaktadır.

Bu kişiler ve kuruluşlar "paydaş" olarak tanımlanmakta olup, şunları kapsamaktadır:

- ✓ Ulusal ve yerel düzeyde kamu kurumları
- ✓ Çevresel, sosyal veya ekonomik konularla ilgilenen sivil toplum kuruluşları
- ✓ Projeden doğrudan etkilenebilecek yerel halk ve geçimini bu bölgelerden sağlayan bireyler

Bu broşür, paydaş katılım sürecinin bir parçası olarak hazırlanmıştır. Amaç, Proje hakkında mümkün olduğunca çok sayıda kişiye bilgi sunmak ve görüşlerini paylaşmaya davet etmektir. Böylece öneriler geliştirilirken ve etki azaltma önlemleri tespit edilirken, paydaşların görüşlerini de değerlendirmeye alabilmek amacıyla hazırlanmıştır.

Antalya-Alanya Otoyolu Projesi'ne ilişkin görüş, öneri ve fikirlerinizi yerleşim birimlerinde bulunan şikayet ve öneri kutuları ile birlikte aşağıdaki kanallar vasıtası ile bize iletebilirsiniz:

Antalya Alanya Otoyolu İnşaat
Yatırım ve İşletme A.Ş.

- Çağrı Merkezi: 0850 202 07 07
- Danışma Ofisi Adres: Orta Mah. Belek Cad. No:7, İç Kapı No:9, Serik, Antalya, Türkiye
- E-posta: info@antalyaalanyaotoyolu.com.tr

www.antalyaalanyaotoyolu.com.tr



ANTALYA-ALANYA
OTOYOLU PROJESİ

BİLGİLENDİRME BROŞÜRÜ

AĞUSTOS 2025





PROJE' NİN BİLEŞENLERİ NELERDİR?

Antalya-Alanya Otoyolu, Serik Kavşağı'ndan başlamakta, daha sonra doğuya yönelerek Serik ve Manavgat ilçeleri sınırları içerisinde Toros Dağları'nın eteklerindeki koridoru takip etmekte ve Konaklı'nın kuzeyinde Alanya Kavşağı'nda sonlanmaktadır.

Sözleşmeye Esas Otoyol Kesimleri

Ana Yol (Otoyol) : 84 km
Bağlantı Yolları : 33.8 km
Toplam Uzunluk : 117.8 km

Ana Yapı Bileşenleri

- ✓ Viyadükler
- ✓ Köprüler
- ✓ Kavşaklar
- ✓ Altgeçitler ve Üstgeçitler
- ✓ Menfezler
- ✓ Otoyol Gişeleri
- ✓ Servis Alanları
- ✓ Bakım ve İşletme Merkezleri

PROJE HANGİ AŞAMADADIR?

Proje kapsamında kamulaştırma planları çıkarılmış ve belirli bölgelerde kamulaştırma çalışmalarına başlanmıştır.

İnşaat faaliyetlerine başlanmış ve ilgili kesimlerde santiyeler kurulmuştur.

Proje inşaat faaliyetlerinin Ekim 2028 içerisinde tamamlanması planlanmaktadır.

PROJE' NİN BEKLENEN FAYDALARI NELERDİR?

Ulaşım Ağlarına ve Yol Kullanıcılarına Sağlayacağı Faydalar:

- ✓ Burdur, Isparta, Konya, Karaman ve Mersin gibi çevre illere ulaşımın kolaylaştırılması
- ✓ Antalya ile Alanya arasında kesintisiz, güvenli ve hızlı ulaşım sağlanması
- ✓ Mevcut D-400 Karayolu'nun trafik yükünün azaltılarak yoğunluğun hafifletilmesi
- ✓ Yolculuk sürelerinin önemli ölçüde kısaltılması ve seyahat konforunun artırılması
- ✓ Turizm sezonunda yaşanan trafik sıkışıklığına karşı yüksek kapasiteli alternatif bir güzergâh oluşturulması
- ✓ Güzergâh boyunca farklı bölgelere erişimin artırılarak bölgesel entegrasyonun desteklenmesi

Sosyal ve Ekonomik Faydalar:

- ✓ Proje'nin inşaat ve işletme aşamalarında yerel istihdam olanakları
- ✓ Otoyol aracılığıyla eğitim, sağlık, turizm ve ticaret merkezlerine daha hızlı ve kolay erişim
- ✓ Tarım ürünlerinin (özellikle narenciye, sebze ve çiçek) pazarlara daha kısa sürede ulaştırılmasıyla ürün tazeliği korunması ve ekonomik değer artışı
- ✓ Yol güvenliğinin artırılmasıyla birlikte trafik kazalarının ve buna bağlı can kayıplarının azaltılması
- ✓ Köy yolları ve bağlantılar üzerindeki ağır araç trafiği azalacağı için ulaşım güvenliğinin artması
- ✓ Seyahat süresinin kısaltılması sonucu yakıt tüketimi ve hava emisyonlarında azalma
- ✓ Şehir içi trafik yükünün, özellikle kamyon ve otobüs gibi ağır araç trafiğinin azalmasıyla, gece saatlerinde yaşanan gürültü seviyesinin düşmesi
- ✓ Modern bir ulaşım altyapısı sayesinde yerel kalkınmanın teşvik edilmesi ve yatırım cazibesinin artırılması
- ✓ Acil durumlarda (örneğin yangın, trafik kazası vb.) müdahale süresinin kısaltılmasıyla toplumsal güvenlik düzeyinin artırılması

Arabic Version

دراسات تقييم الأثر البيئي والاجتماعي

بدأت عملية تقييم الأثر البيئي والاجتماعي لمشروع طريق أنطاليا-الأنيا السريع. وتم تحديد وتقييم الأثر البيئية والاجتماعية المحتملة للمشروع، واقتراح تدابير للتخفيف من حدتها.

وقد كلفت شركة طريق أنطاليا-الأنيا السريع للإشاعات والاستثمار والتشغيل المساهمة (AAOİAS)، الجهة التنفيذية للمشروع، شركة إنكون ENCON للاستشارات البيئية المحدودة بإجراء هذه الدراسة.

سيستمر مراعاة الظروف البيئية والاجتماعية الحالية طوال مدة المشروع.

فيما يلي ملخص للقضايا البيئية والاجتماعية الرئيسية التي درست بالتفصيل في نطاق دراسات تقييم الأثر البيئي والاجتماعي:

- ✓ التغييرات الإقليمية في استخدامات الأراضي الحالية ومصادر الدخل
- ✓ التغييرات المحتملة في الضوضاء وجودة الهواء
- ✓ الاضطرابات التي قد تنشأ عن أنشطة البناء
- ✓ توريد مواد البناء والتخلص من النفايات
- ✓ القضايا المتعلقة بسلامة الطرق والمرور
- ✓ التأثيرات على الموائل الطبيعية وحيواناتها ونباتاتها
- ✓ إمكانية اكتشاف مواقع ذات أهمية تراثية ثقافية وبقايا أثرية مجهولة
- ✓ حماية الظروف المعيشية للسكان، وخاصة الفئات الضعيفة مثل النساء وكبار السن
- ✓ آثار المشروع على الاقتصاد المحلي والزراعة وسبل العيش
- ✓ المخاطر المحتملة على الصحة والسلامة العامة والتدابير الواجب اتخاذها

إمكانات التعبير عن الرأي

تعتمد عملية تقييم الأثر البيئي والاجتماعي لمشروع طريق أنطاليا-الأنيا السريع على مبدأ جمع آراء جميع الأفراد والمؤسسات المتأثرة بالمشروع أو المهتمة به.

يُعرف هؤلاء الأفراد والمنظمات بـ"أصحاب المصلحة"، وهم:

- ✓ المؤسسات العامة الوطنية والمحلية
- ✓ منظمات المجتمع المدني الوطنية المعنية بالقضايا البيئية والاجتماعية والاقتصادية
- ✓ المجتمعات المحلية والأفراد المتأثرين مباشرة بالمشروع والذين يكسبون رزقهم في هذه المناطق

أعد هذا الكتيب كجزء من عملية إشراك أصحاب المصلحة. والهدف هو توفير معلومات حول المشروع لأكثر عدد ممكن من الناس، وحثهم على إبداء آرائهم. تضمن هذه العملية مراعاة آراء أصحاب المصلحة عند وضع التوصيات وتحديد تدابير التخفيف.

يمكنكم إرسال آرائكم ومقترحاتكم وأفكاركم بخصوص مشروع الطريق السريع أنطاليا-الأنيا من خلال صناديق الشكاوى والاقتراحات الموجودة في المناطق السكنية، وكذلك من خلال القنوات التالية:

شركة طريق أنطاليا الأنيا السريع للإشاعات والاستثمار والتشغيل المساهمة

• مركز الاتصال: 08502020707

• عنوان مكتب الاستشارات: حي أورتا، شارع بيبك الرقم 7، الباب الداخلي رقم 9، سيريك، أنطاليا، تركيا

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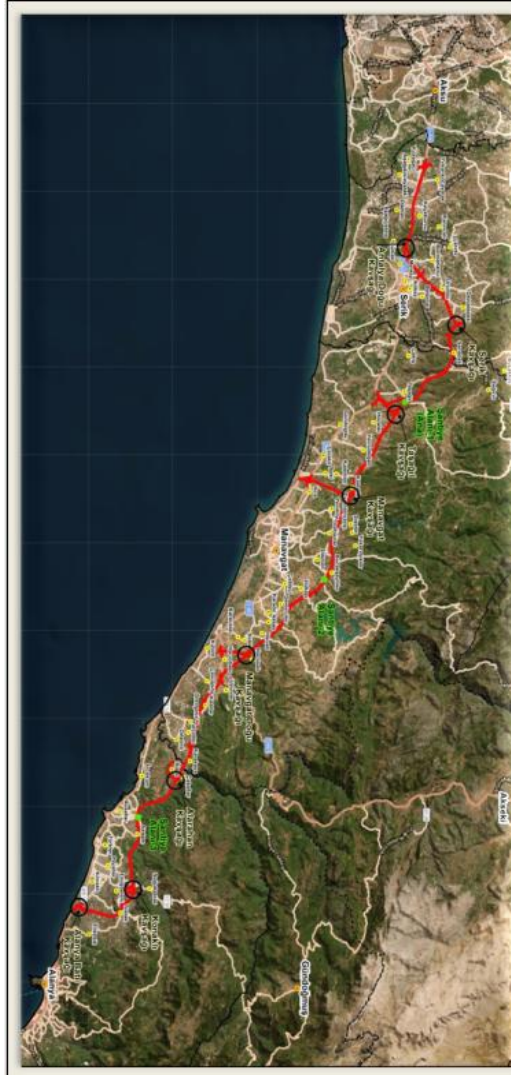


مشروع الطريق السريع
أنطاليا-الأنيا

بروشور المعلومات

أغسطس 2025





ما هي مكونات المشروع؟

يبدأ طريق أنطاليا-ألانيا السريع عند تقاطع سيريك، ثم يتعطف شرقاً، متتبِعاً الممر على طول سفوح جبال طوروس ضمن حدود مقاطعتي سيريك وماتافغات، وينتهي عند تقاطع ألانيا شمال كوناكلي.

أقسام الطريق السريع التعاقدية

الطريق الرئيسي (الطريق السريع): 84 كم
الطرق المتصلة: 33.8 كم
الطول الإجمالي: 117.8 كم

مكونات الهيكل الرئيسي

- ✓ الجسور العلوية
- ✓ الجسور
- ✓ التقاطعات
- ✓ الأنفاق السفلية والعلوية
- ✓ القنوات المائية
- ✓ كبائن تحصيل الرسوم
- ✓ مناطق الخدمة
- ✓ مراكز الصيانة والتشغيل

إلى أي مرحلة وصل المشروع؟

تم إعداد خطط نزع الملكية للمشروع، وبدأت أعمال نزع الملكية في بعض المناطق.

بدأت أعمال البناء، وتم تحديد مواقع البناء في المناطق المعنية.

من المقرر الانتهاء من بناء المشروع في أكتوبر 2028.

ما هي الفوائد المتوقعة من المشروع؟

الفوائد لشبكات النقل ومستخدمي الطرق:

- ✓ تسهيل الوصول إلى المحافظات المحيطة مثل بوردور، وإسبرطة، وقونيا، وكردمان، ومرسين.
- ✓ توفير نقل متواصل وآمن وسريع بين أنطاليا وألانيا.
- ✓ تخفيف الازدحام المروري على الطريق السريع D-400 الحالي.
- ✓ تقصير أوقات الرحلات بشكل ملحوظ وتحسين راحة السفر.
- ✓ إنشاء طريق بديل عالي السعة لتخفيف الازدحام المروري خلال الموسم السياحي.
- ✓ دعم التكمال الإقليمي من خلال زيادة إمكانية الوصول إلى مختلف المناطق على طول الطريق.

الفوائد الاجتماعية والاقتصادية:

- ✓ فرص عمل محلية خلال مرحلتي بناء وتشغيل المشروع.
- ✓ وصول أسرع وأسهل إلى مراكز التعليم والرعاية الصحية والسياحة والتجارة عبر الطريق السريع.
- ✓ الحفاظ على نضارة المنتجات وزيادة قيمتها الاقتصادية من خلال توصيل المنتجات الزراعية (وخاصة الحمضيات والخضراوات والزهور) إلى الأسواق بسرعة أكبر.
- ✓ الحد من حوادث المرور والوفيات الناجمة عنها من خلال تحسين السلامة على الطرق.
- ✓ زيادة سلامة النقل بفضل انخفاض حركة مرور المركبات الثقيلة على طرق القرى والتقاطعات.
- ✓ خفض استهلاك الوقود وانبعاثات الهواء بفضل تقصير أوقات السفر.
- ✓ خفض مستويات الضوضاء الليلية بفضل انخفاض حركة المرور في المناطق الحضرية، وخاصة حركة مرور المركبات الثقيلة مثل الشاحنات والحافلات.
- ✓ تعزيز التنمية المحلية وزيادة جاذبية الاستثمار من خلال بنية تحتية حديثة للنقل.
- ✓ تعزيز السلامة العامة من خلال تقليل أوقات الاستجابة في حالات الطوارئ (مثل الحرائق وحوادث المرور، إلخ).

Kurdish Version

كارهكانى هائسانگاندنى كارىگهريى ژىنگهريى و
كۆمهلايەتى(ÇSED)

له جوارچىووى برۆزەى نۆتۆبائى نەنتالیا-نالانیا، برۆسەى هائسانگاندنى كارىگهريى ژىنگهريى و كۆمهلايەتى (ÇSED) دەستى بىكرىووه. كارىگهريى نەگهريىهكانى برۆزەكه لىسەر ژىنگه و زىاتى كۆمهلايەتى دىارىكراون، هائسانگاندنىان بۇ كراوه و رىوشوئى بىويست بۇ كەسكردەئەوى نەم كارىگهريىهائە پىشنىار كراون.

كۆمپانیاى وەبەرھىنان و بىرئۆبەردى دروستكرىتى نۆتۆبائى نەنتالیا-نالانیا (Antalya-Alanya Otoyolu İnşaat Yatırım) (AAOİAŞ) كۆمپانیاى (ve İşletme A.Ş. (AAOİAŞ) كه برۆزەكه بىرئۆبە دەبات، كۆمپانیاى نىنگون بۇ راولۆكارى ژىنگهريى سنووردارى (ENCON Çevre) (Danışmanlık Ltd. Şti. بۇ نەجامدانى نەم كارە راسپاردووه.

بارودۇخى ژىنگهريى و كۆمهلايەتى نىستا، له ماوهى برۆزەكهدا بىردەوام كەسەرچاوى دەقيرىت.

بايەتە سەرەككەكانى ژىنگهريى و كۆمهلايەتى كه له جوارچىووى كارەكانى ÇSED يە وردى لىكۆلئىنەئەوىان لىسەر كراوه، له خوارووه كورتكراونەئەوه:

- ✓ كۆرتاكرارىيە هەريىيەكان له بەكارھىنانى زەوى و سەرچاوهكانى داھانى نىستا
- ✓ كۆرتاكرارىيە نەگهريىەكان له ناستى زاوہزاو و كوالىتى ھەوا
- ✓ ناتارامىيەكانى نەگهريى بەھوى چالاككەكانى دروستكرىتەئەوه
- ✓ دايبىكرىتى كەرسەكەكانى دروستكرىن و فرىدانى باشماوہكان
- ✓ بايەتەكانى بىويست يە سەلامەتى رىنگا و ھاتوچۇ
- ✓ كارىگهريىەكان لىسەر نىشنىگهريى سروسى و نازەلان و رۆوہكى ناو نەم نىشنىگە
- ✓ شوئە گرتەكان له رۆوى مىرانى كۆلتورىيە و نەگهريى دۆزىنەئەوى باشماوہ شوئەئەوىيە نەزائراوہكان
- ✓ پاراستى بارودۇخى زىاتى خەلك، بايەتىيە گروپە ھەستيارەكان وەك زەن و ياسالاجووان
- ✓ كارىگهريىەكانى برۆزەكه لىسەر نابوورىى ناوخۆيى، كشتوكاڤ و سەرچاوهكانى بۆيوى
- ✓ ماترىسيە نەگهريىەكان له رۆوى تەندروستى و سەلامەتىيە گىشتىيەئەوى و رىوشوئەكانى بىويست

دەرفەتەكانى دەربەرىنى را و بۆچوون

برۆسەى ÇSED كه له جوارچىووى برۆزەى نۆتۆبائى نەنتالیا-نالانیادا بىرئۆبەدەجىت، لىسەر بىنەماى وەرگرتى را و بۆچوونى ھەموو نەم كەس و دامەزراوانە دامەزراوہ كه رەتەگە كارىگهريى برۆزەكەيان لىسەر بىت بان گرتى يە برۆزەكه دەدەن.

نەم كەس و رىنكراونە وەك "لايەتى بىويستدەيار" بىنەسا دەكرىن و نامانە لەخۆدەكرن:

- ✓ دامەزراوہ گىشتىيەكان لىسەر ناستى نىشمانى و ناوخۆيى
- ✓ رىنكراونەكانى كۆمەلگەى مەدەنى كه گرتى يە بايەتە ژىنگهريى، كۆمەلايەتى بان نابوورىيەكان دەدەن
- ✓ خەلكى ناوخۆكه كه راستەوخۆ كارىگهريى برۆزەكەيان لىسەر و نەم كەسەئەوى كه بۆيويان لىسەر نەم ناوخۆتەيە

نەم تەملىكەيە وەك بىشكىن له برۆسەى باشتارىيەكرىتى لايەتە بىويستدەيارەكان نامادەكراوہ. نامانج لى بىشكەتكرىتى زانبارىيە يە زۆرترىن زماهى خەلك سەيارەت يە برۆزەكه و بانگەپىشنىكەكانى بۇ ھاويەشكىرىتى را و بۆچوونەكانيان. بىم شۆيە، بۇ نەم نامادەكراوہ كه له كاتى كەشەپىدانى پىشنىارەكان و دىارىكرىتى رىوشوئەكانى كەسكردەئەوى كارىگهريىەكاندا، را و بۆچوونى لايەتە بىويستدەيارەكان لىسەرچاوى بىكرىت.

را و پىشنىار و بىرۆكەكانتەن سەيارەت يە برۆزەى نۆتۆبائى نەنتالیا-نالانیا دەتوانن له رىنگەى سەنوقەكانى سكاڤا و پىشنىار له يەكە نىشەنجىويونەكان و ھەرودە له رىنگەى نەم كەنالاى خوارووه بىمان بىگەيەن:

كۆمپانیاى پىشكى ھاويەشى وەبەرھىنان و كارپىكرىتى
دروستكرىتى رىنگاوتى نەنتالیا نالانیا (Antalya Alanya
(Otoyolu İnşaat Yatırım ve İşletme A.Ş.

سەختەرى پەيوەندى: 0850 202 07 07

- كەسەكى نۆرنا، شەقامى بۆلەك ژمارە: ۷، دەرگاى ناوہوہ ژمارە: ۹، سىزىك، نەنتالیا، تۆركىيە (Orta Mah. Belek (Cad. No:7, İç Kapı No:9, Serik, Antalya, Türkiye

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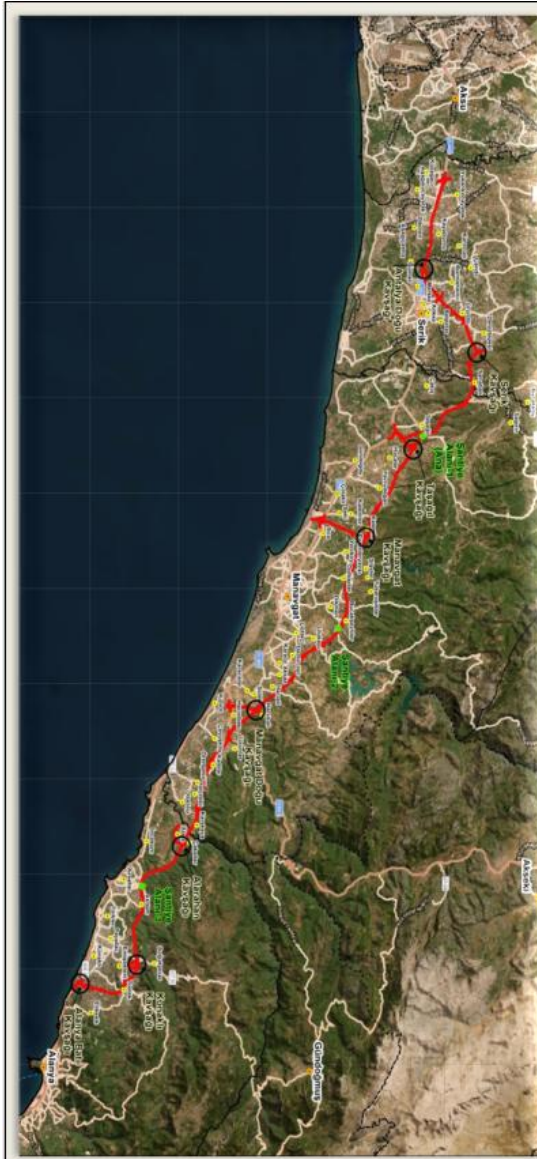
ANTALYA ALANYA
OTOYOLU

نۆتۆبائى
نەنتالیا-نالانیا

نامىلكەى زانبارى

نابى 2025





**پنکھاتہ کاتی
پرؤژہ کە چین؟**

نۆتۆبانی نانتالیئا-نالانیا له یەکنەریی سیرکەوێ دەست پێدەگات، پاشان ناراستەیی رۆژەهەلات دەگرتەبەر و بەمۆای ئەو رێڕەوێدا دەروات کە دەکەوێتە بناری چیاکانی تۆرۆس لە سنووری قەزاقانی سیرک و ماناڤگات، و لە باکووری کۆتایی لە یەکنەریی نالانیا کۆتایی دیت.

بەشەکانی نۆتۆبان بەینی گریبەست

رینگای سەرەکی (نۆتۆبان): 84 کم
رینگا گریبەهەکان: 33,8 کم
کۆی گشتی دریزی: 117,8 کم

پنکھاتە سەرکێیەکانی بیناسازی

- ✓ برده دۆلیبەکان (قیادەکت)
- ✓ بردهکان
- ✓ زێریارەکان و سەریارەکان
- ✓ کاتالەکانی ناو
- ✓ خالەکانی وەرگرتنی باجی نۆتۆبان
- ✓ تاوچەکانی خزمەتگۆزاری
- ✓ تاوئەندەکانی چاککردنەوێ و بەرپوێبەردن

**پرؤژە کە لە چ
قۆناغێکدا یە؟**

لە چوارچۆی پرؤژە کەدا، پلانەکانی بەخاوەنکردنی گشتی (ئێستملاک) نامادەگراون و لە هاتنەبێگ تاوچەدا کارەکانی بەخاوەنکردنی گشتی دەستیان بیکردوو.

چالاکییەکانی دروستکردن دەستیان بیکردوو و لە بەشە یەمۆئەندەدارەکاندا شۆینی کار (شەنتیە) دامەزران.

پلان وایە چالاکییەکانی دروستکردنی پرؤژە کە لە تشرینی یەکمەمی 2028 دا تەواو بێ.

**سوودە چاوەروانکراوەکانی
پرؤژە کە چین؟**

سوودەکانی بۆ تۆرەکانی گواستەوێ و بەکارهێنەرانی رینگا:

- ✓ ناسانکردنی گەشتن بە پارێژگا دراوسێکان وەگ یوردور، ئێسپارتا، قۆنیا، کارامان و مێرسین
- ✓ داڕێژینی گواستەوێ بێ بچران، سەلامەت و خێرا لە نێوان نەنتالیئا و نالانیا
- ✓ کەمکردنەوێ باری هاتووچۆی سەر رینگای D-400 ی نێستا و سووککردنی قەریبەلغی
- ✓ کورتکردنەوێ بەرچاوی ماوێ گەشتکردن و زیادکردنی ناسوودەیی گەشت
- ✓ دروستکردنی رێڕەوێکی جێگرەوێ بۆتوانای بەرز یق بەرەنگاریبووتەوێ قەریبەلغی هاتووچۆ لە وەرزی گەشتیاریدا
- ✓ پشتگیریکردنی یەکنەریی هەریمی لە رینگەیی زیادکردنی دەرفەتی گەشتن بە تاوچە جیاوازهەکان بە دریزی رێڕەوێ کە

سوودە کۆمەڵایەتی و نایوورییەکان:

- ✓ داڕێژکردنی هەمی کاری ناوخبۆی لە قۆناغەکانی دروستکردن و بەرپوێبەردنی پرؤژە کەدا
- ✓ گەشتینی خێراتر و ناسانتر بە تاوئەندەکانی خۆئێدن، تەندروستی، گەشتیاری و بازارگانی لە رینگەیی نۆتۆبانەوێ
- ✓ پاراستنی تازەیی بەرھەمە کشتوکالییەکان (بەتایبەتی مەزەمەنییەکان، سەوزە و گۆل) و زیادبوونی بەھای نایوورییان لە رینگەیی گەشتیاران بە بازارەکان لە ماوێ یەکی کورتدا
- ✓ کەمکردنەوێ رووداوێ هاتووچۆ و گیانلەدەستدانی بەھۆبانەوێ لە رینگەیی زیادکردنی سەلامەتی رینگا
- ✓ زیادبوونی سەلامەتی لە گواستەوێدا بەھۆی کەمیووتەوێ هاتووچۆی نۆتۆمیلی بارهەنگری قورس لەسەر رینگای گۆندەکان و رینگا گریبەهەکان
- ✓ کەمیووتەوێ بەکارهێنانی سووتەمەنی و دەرواویشتە هەواییەکان بەھۆی کورتبووتەوێ ماوێ گەشت
- ✓ کەمیووتەوێ ناستی ژاوەزاو لە کاتەکانی شەویدا بەھۆی کەمیووتەوێ باری هاتووچۆی ناو شار، بەتایبەتی هاتووچۆی نۆتۆمیلی قورسەکان وەگ بارهەنگر و پاس
- ✓ هاندانی گەشتیاری ناوخبۆی و زیادکردنی سەرنجراکیشیی و بەرھێنان بەھۆی بوونی زێرخانیکی گواستەوێ مۆبێرن
- ✓ بەرزبووتەوێ ناستی سەلامەتی کۆمەڵایەتی لە رینگەیی کورتکردنەوێ ماوێ وەلامدانەوێ لە حالەتە لەناکاوکاندا (بۆ نمۆنە ناگرکەوتەوێ، رووداوی هاتووچۆ و ھتە)



ANNEX-5.A: GLAC – Affected Lands



ANTALYA – ALANYA MOTORWAY PROJECT

RESETTLEMENT ACTION PLAN (RAP) GUIDE TO LAND ACQUISITION AND COMPENSATION (GLAC) – AFFECTED LANDS –



OCTOBER 2025

REVISION 1

CONTENT

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E.	COMPENSATION AND ENTITLEMENTS UNDER RESETTLEMENT ACTION PLAN (RAP) TO MEET INTERNATIONAL STANDARDS
F.	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE
G.	PROJECT GRIEVANCE MECHANISM
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A. INTRODUCTION

1. What is Antalya-Alanya Motorway Project?

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

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

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



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

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

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

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

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

4. What are the Project’s Applicable International Standards

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

The following international standards are applicable to the Project:

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

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

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

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

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

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

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

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

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

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

7. How the RAP has been reviewed independently?

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

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

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

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

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

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

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

B. PROJECT DESCRIPTION

9. What are the key Project Components?

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

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

10. Are there any associated facilities of the Project?

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

11. What is Motorway Expropriation Corridor?

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

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

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

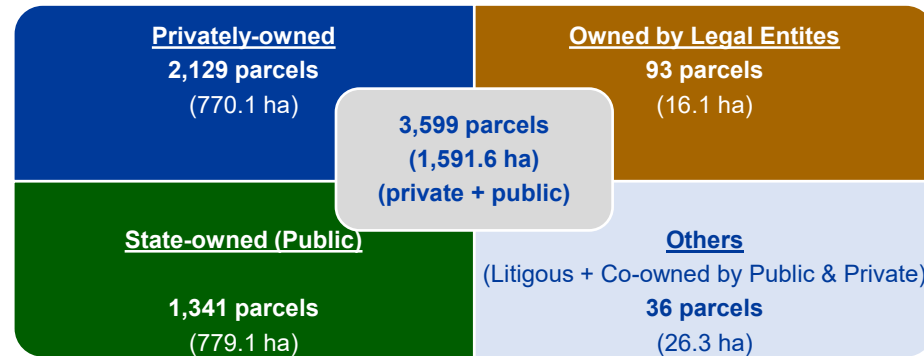
12. Which Settlements are affected within the Expropriation Corridor?

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

- **Serik (12 neighbourhoods):** Deniztepesi, Sariabali, Yukarikocayata, Asagikocayatak, Kayaburnu, Dikmen, Candir, Asagicatma, Cumali, Burmahanci, Urundu, Belpinar
- **Manavgat: (34 neighbourhoods):** Cakis, Tasagil, Gundogdu, Hocalar, Yavrudogan, Colakli, Seki, Kalemler, Evren, Ilica, Yenikoy, Siseler, Evrenleryahsi, Dolbazlar, Yukariisiklar, Dikmen, Bucakseyhler, Ulukapi, Asagisiklar, Demirciler, Karaoz, Aksaz, Haciali, Cevizler, Sulek, Hacıisali, Hacıobası, Kızılot, Uzunlar, Kadilar, Orenşehir, Yalcidibi, Odaonu, Karakaya
- **Alanya (11 neighbourhoods):** Alara, Cakallar, Incekum, Avsallar, Akdam, Turkler, Payallar, Emisbeleni, Toslak, Telatiye, Elikesik

13. How many Parcels are Affected?

There are **3,599 private, legal entity, and public (state-owned)** parcels to be acquired **within Project's expropriation corridor**.



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

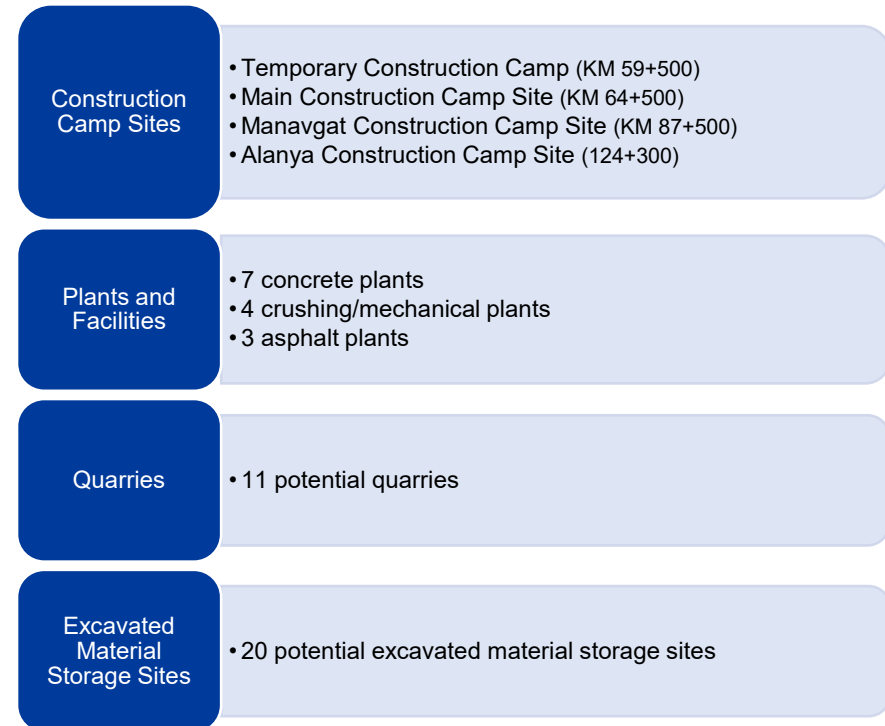
The majority of the affected parcels are registered as **agricultural land, road, and forest**.

Number of Parcels per Land Registry Type (3,599 parcel)	Area of Parcels per Land Registry Type (1,591.6 ha parcel)
• Agricultural (2,507 parcel)	• Agricultural (825.6 ha)
• Road (258 parcel)	• Forest (553.5 ha)
• Forest (149 parcel)	• Road (53 ha)
• Land with structures (148 parcel)	• Land with structures (42.2 ha)
• Constructible plot (87 parcel)	• Constructible plot (9.1 ha)
• Orchard (101 parcel)	• Orchard (21.7 ha)
• Raw soil (83 parcel)	• Raw soil (15.8 ha)
• Litigious (13 parcel)	• Litigious (12.2 ha)
• Pasture (3 parcel)	• Pasture (0.2 ha)
• Others (250 parcel)	• Others (58.3 ha)

15. Which temporary facilities will be required during construction?

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

A list of planned facilities is included in the RAP.



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

Private parcels required for temporary facilities are acquired by the SPV/EPC through rental agreements, mutual protocols, or other similar arrangements made with the landowners or shareholders. Upon completion of temporary use, the land is rehabilitated and returned to the owner in accordance with the agreed terms.

17. What are key milestones in the Project schedule?

No	Key Milestones / Tasks	Date
0	BOT Contract Signing, Site Delivery	14 October 2024
1	Expropriation	
1.1	Start of inventory of assets and valuation study commenced by appointed valuation contractor	November 2024
1.2	Start of expropriation procedures – through Article 8 negotiations – by KGM	February 2025
1.3	Completion of valuation	Q4 2025 (<i>target</i>)
1.4	Completion of Article 8 negotiations as part of expropriation procedures undertaken by KGM	
	Phase 1: KM 52 – 56; KM 74 – 104; KM ~64 (O&M Centre), KM ~80 (Concrete Plant)	February – August 2025 (completed)
	Phase 2: KM 56 – 74; KM 104 – 116; Connection Roads: Manavgat East, D-400, Serik	September 2025 – January 2026 (<i>target</i>)
	Phase 3: KM 116 – 141; Connections roads: Taşağül, Manavgat, Alarahan and Konaklı	April 2026 (<i>target</i>)
2	E&S Studies and Finance Agreement	
2.1	Start of ESIA Package studies	March 2024
2.2	Start of RAP studies	April 2025
2.3	ESIA Package Disclosure by SPV, Lenders (60 days)	Q2 and Q3 2025
2.4	Finance Agreement Signing	6 October 2025
3	Construction Works	36 months after Signing
3.1	Land entry by the Project for design-related activities	November 2024
3.2	Site Mobilisation and Start of Construction	March 2025
3.3	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
	KM 52+000 – 80+000	November 2027 (<i>target</i>)
	KM 80+000 – 114+750	January 2028 (<i>target</i>)
	KM 114+750 – 141+705	November 2027 (<i>target</i>)
3.4	Tunnels, Viaducts, Superstructure, O&M Centre, Motorway Service Facilities (MSFs) and Other Secondary Works	March 2028
4.	Motorway Commissioning	Within 36 months from the date of signing the finance agreement

C. LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS

18. What is the status of land acquisition?

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

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

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

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

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

Planned Schedule of Article 8 Negotiation Meetings

Negotiation Meeting Date	Settlements
Completed between February – September 2025	<u>Serik</u> : Deniztepesi, Sariabalı <u>Manavgat</u> : Şişeler, Taşağıllı, Aksaz, Cevizler, Demirciler, Hacıali, Hacısalı, Hacıobası, Karaöz, Sülek, Aşağıışıklar, Bucakşeyhler, Dikmen, Ulukapı, Yukarıışıklar, Dolbazlar, Evrenleryavşı, Kalemler, Seki, Yeniköy, Şişeler
October 2025 (planned)	<u>Manavgat</u> : Kadılar, Karakaya, Odaönü, Örenşehir, Uzunlar, Yalçıdibi
November 2025 (planned)	<u>Serik</u> : Aşağıkocayatak, Çandır, Dikmen, Kayaburnu, Yukarıkocayatak <u>Manavgat</u> : Çakış, Çolaklı, Gündoğdu, Hocalar, Taşağıllı, Yavrudoğan
November 2025 (planned)	<u>Manavgat</u> : Hacıobası, Kızılot
January – February 2026 (planned)	<u>Serik</u> : Deniztepesi, Sariabalı, Üründü, Belpınarı, Burmahancı, Cumalı, Aşağıçatma
February – April 2026 (planned)	<u>Manavgat</u> : Evren, Ilıca <u>Alanya</u> : Alara, Çakallar, Akdam, İncekum, Avsallar, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. EXPROPRIATION PROCESS IN LINE WITH EXPROPRIATION LAW

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

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

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

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

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

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

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

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

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

Affected Asset	Eligible PAPs
Private Parcels	<ul style="list-style-type: none"> • Owners of lands, trees, crops, structures on affected lands • Formal land users (with official documentation) for trees, structures, crops on affected lands • Informal land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19) • Litigant owners/shareholders or formal and informal users of litigious parcels
Public Lands	<ul style="list-style-type: none"> • Formal public land users (who have official documentation, e.g. adequate pay "<i>ecrimisi</i>", rental agreement) for trees, crops, and structure • Informal public land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19)
Greenhouses	<ul style="list-style-type: none"> • Owner of the greenhouse – owner/shareholder of the private land • Owner of the greenhouse – formal tenant of the land, owner of the greenhouse • Formal tenant of the greenhouse on lands owned by others (not the owner of the greenhouse) • Owner of the greenhouse – informal user of treasury lands (with no official documentation for land use but can prove their ownership of the structure) • Owner of the greenhouse – informal user of forest and pasture lands or with no official documentation proving their ownership of the structure

E. COMPENSATION AND ENTITLEMENTS UNDER RAP TO MEET INTERNATIONAL STANDARDS

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

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

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

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

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

Affected houses: The SPV will notify the owners and tenants of affected structures at least **three months** in advance of the commencement of expropriation, in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time (more than six months) for resettlement planning.

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

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

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

- **Vulnerable Groups:** The SPV will pay specific attention to vulnerable individuals and households, and provide tailored assistance in line with the measures outlined in the RAP. In-kind support will be provided by the SPV to the vulnerable households.

The identification of vulnerable individuals and households has already been initiated as part of the RAP process. 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.

28. What is Cut-off Date for Eligibility?

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

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

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

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

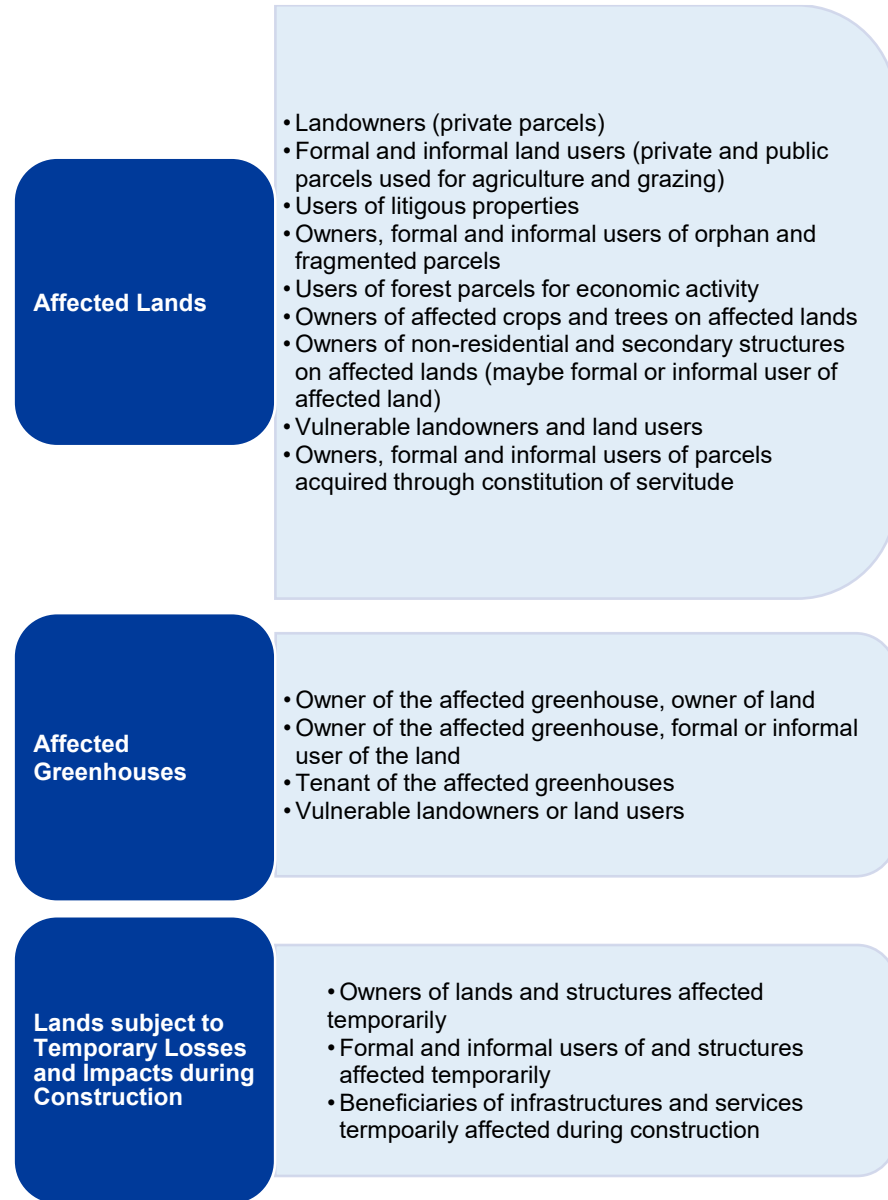
All people affected by the Project and owning and/or using (formally or informally) the affected lands and assets **before the cut-off dates** defined in the RAP are eligible for compensation and assistance under RAP.

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

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

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

The eligibility categories identified in the RAP are as follows:



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

• Owners and Shareholders of Affected Private Parcels

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

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

- **Assistance in searching replacement land** that is of similar quality, size, and location, subject to availability.
- Compensation to cover **transaction costs** applicable to the acquisition of replacement, if replacement land of similar quality, size, and location is identified by the PAPs who reach an agreement with KGM under Article 8.
- SPV support to cover **small costs** for official expropriation procedures (such as power of attorney costs, working capital fund for title deed transactions, inner and inter city transportation costs, etc.)
- SPV support for **relocating movable assets** to an alternative land determined by PAP.
- **Access to livelihood restoration, improvement and assistance measures** (as outlined under [Question 35](#)) provided by SPV through RAP Fund if land is used for economic activity.

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

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

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

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

- **Assistance in searching replacement land** that is of similar quality, size, and location, subject to availability.
- **One-off transitional support equivalent to the 1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land
- **For long-term formal tenants** (whether for greenhouses or open fields) who have paid rent in advance, guidance by the SPV regarding the legal procedures to follow to obtain a refund for the unused portion of the rental payment and if the unused portion of the rental payment cannot be obtained from the landowner, compensation of the outstanding amount by the SPV from the RAP Fund (such tenants and their tenancy agreement conditions will be determined by the SPV on a case-by-case basis during RAP implementation).
- **For long-term formal tenants** (whether for greenhouses or open fields), in cases where tenants are subject to fines under their lease agreements due to early termination, support or compensation by SPV to ensure that tenants are not disadvantaged (based on case-by-case review of the specifics of tenancy agreements).
- Notification of the user by SPV **three months in advance of land entry**.
- If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry.
- SPV support for **relocating movable assets** to an alternative land determined by PAP.
- If there are major fixed improvements or investments (*including structures such as barns, sheds, depots, pools, etc.*) made or owned by the **informal user** on the affected land, top-up compensation in addition to the compensation paid by KGM (based on evidence of ownership) – in order to reflect market value as KGM compensates only for the **minimum material cost** under Article 19 of the Expropriation Law.
- Access to **livelihood restoration, improvement and assistance** measures (as outlined under [Question 35](#)) provided by SPV through RAP Fund.

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

- **Litigant Owners and Shareholders:**

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

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

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

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

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

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

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

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

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

- **Owners of Affected Crops**

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

The SPV will notify the crop owners at least **three** months in advance of land entry.

If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry.

- **Owners of Affected Trees**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

• Owners of the Greenhouses – who own the Land

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

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

- Notification of the crop owners at least **three** months in advance of land entry.
- Top-up cash compensation to cover the amount deducted for **depreciation**;
- If not included in the expropriation value provided by KGM, additional cash compensation at full replacement cost to cover the cost of fixed (non-movable) investments and improvements made by the greenhouse owner, such as irrigation, heating, drainage, lighting system and components, etc. – a third-party valuation expert commissioned by the SPV will determine the associated costs on market prices.
- Compensation for costs incurred by greenhouse owners – whose greenhouses are partially expropriated – to support repair and adjustment works on the remaining portions, such as the rearrangement of irrigation or drainage systems, repair of greenhouse nylon covers, and similar interventions.
- If land entry by the Project is required before the end of the harvesting period, **cash compensation for unharvested crops and products** (e.g., fruits) prior to land entry. If the greenhouse is partially affected, crop compensation will be provided for the affected part.
- Assistance in searching a replacement site for the relocation of the greenhouse, if such relocation is planned by the greenhouse owner.
- If requested by the PAPs, support for the preparation of the land where the greenhouse will be reestablished – this may include the provision of construction machinery and labour, land levelling, provision of suitable topsoil stripped from Project areas, infrastructure connections for electricity, water, other utilities, etc.
- Assistance for rearranging the greenhouse to ensure continuity of operations (rearrangement of irrigation system, drainage system, heating system, etc.), if requested, if the greenhouse is partially affected and the owner continues operations on the remaining land.
- Arranging the full relocation or reimbursement of the moving costs (disassembly-assembly) incurred by the greenhouse owners for their movable

assets and infrastructure components (such as movable irrigation system components), through direct payment to vendors or based on submitted evidence or documentation, at the time the expenses are incurred.

- **Access to livelihood restoration, improvement and assistance measures** (as outlined under [Question 35](#)) provided by SPV through RAP Fund.
- Information of the landowners and shareholders about their right to apply for the acquisition of orphan land in accordance with the Expropriation Law and coordinating consultations with KGM to facilitate the acquisition of the remaining portion – subject to evaluation and approval by KGM.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

For greenhouses owned by informal users are on forestry and pasture lands, which are not subject to compensation by KGM, or if the greenhouse owner (informal land users) cannot prove her/his ownership claim, determination of the market value of the affected greenhouse by a **third-party valuation expert** commissioned by the SPV and provision of cash compensation reflecting this value by the SPV

- **One-off transitional support equivalent to the 1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land with affected greenhouse

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

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

Construction phase impacts on people and environment will be managed through the measures specified in the Project ESIA, ESMP and subject-specific management plans (e.g. Community Health and Safety Plan) to be implemented by the SPV and construction (EPC) contractors (including subcontractors) with the objective of avoiding the impacts where possible, and where avoidance is not possible minimising and/or compensating the impacts.

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

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

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

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

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

- **In-kind support** (e.g. agricultural input materials, tailored support packages) to vulnerable households identified during RAP preparation and implementation.
- **For vulnerable households affected by physical and/or economic displacement, priority** for all livelihood restoration, improvement, and assistance measures outlined in the RAP.
- Specific attention to vulnerable people during information, consultation, negotiation and post-resettlement monitoring processes through individually informing vulnerable PAPs about the Project, land acquisition process, RAP entitlements/support, and the grievance mechanism.
- Timely updates regarding expropriation status and court decisions, based on notifications received from KGM
- Assistance with applications to KGM for acquisition of remaining, unusable land parcels (orphan lands), including help with documentation, communication, and logistics.
- Support in completing legal and administrative procedures to enable timely access to expropriation payments.
- Facilitation of access to legal advice and public institutions, including assistance with preparing and submitting required documentation.
- In case the vulnerable PAPs own non-residential structures affected by the Project (e.g. barns, sheds, etc.), in-kind support and assistance for reconstruction of the affected structure at an available location to be indicated by the vulnerable PAP.

- Assistance in identifying and applying to existing government or third-party support programs targeting vulnerable individuals or households
- Where needed or requested, support to individuals in opening bank accounts to facilitate direct access to compensation and support payments.
- Priority for unemployed female members of physically and/or economically displaced households who are actively seeking employment.
- Training programmes to be designed and delivered by the external Agricultural Consultancy Companies.
- Women-specific training programmes.

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

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

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

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

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

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

Livelihood restoration and improvement measures will be updated as necessary.

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

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

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

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

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

Affected Agricultural Land Users

- Official documentation of ownership for the affected assets such as lands, greenhouses, etc. (e.g., land registry records/title deeds, inheritance documents, ownership documents) (*for owners*)
- Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor (*for owners, formal and informal users*)
- Tenancy agreements (*for formal users*)
- Evidence/confirmation of land use provided by settlement heads, community leaders, and other credible witnesses or third parties (*for informal users*)
- Documentation on transaction costs (*for owners, formal and informal users*)
- Evidence of expenditures made for fixed investments and improvements (*for greenhouse owners*)

F. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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

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

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

- The RAP (including the GLAC) **will be published in English and Turkish on the SPV and Lenders' websites**, in line with their disclosure policies and timelines.
- This GLAC, explaining the entitlements and next steps clearly to all affected people and stakeholders, will be delivered to the offices of mukhtars and directly to affected people and vulnerable individual in each settlement.
- The **hard copies (in Turkish)** of the final RAP and GLAC will be made available at the following locations: Project Information Office in Serik, Project's Construction Camp Sites, and Offices of the settlement heads (mukhtars)
- The **SPV CLOs will engage individually with affected households that include vulnerable members** to distribute the GLAC and communicate the key information from the RAP, as applicable.
- Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions prior to Article 8 negotiation meetings. **Priority will be given to settlements where land was or will be expropriated in the 2025, as listed in the table below under the "Priority Settlements to be covered during the Disclosure Period"**.
- Meetings in other settlements will continue throughout the first year of RAP implementation, in alignment with the expropriation and construction schedules.
- **The Project will continue engaging with affected people throughout the 36-month RAP implementation period** in line with the RAP Stakeholder Engagement Action Plan for RAP.

G. PROJECT GRIEVANCE MECHANISM

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

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

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

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

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

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

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

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

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

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

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

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

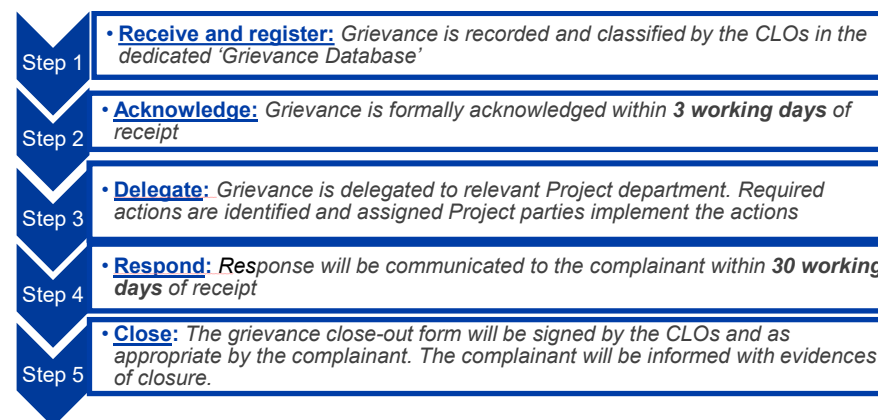
Through this mechanism, stakeholders can submit their concerns using the **channels listed below in Section H "CONTACT INFORMATION FOR STAKEHOLDERS"**

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

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

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

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



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

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

H. CONTACT INFORMATION FOR STAKEHOLDERS

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

Project website	www.antalyaalanyaotoyolu.com.tr
E-mail	info@antalyaalanyaotoyolu.com
Mail	<p>Ankara – Centre: Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye</p> <p>Ankara – Office: Söğütözü Cd. Koç Kuleleri No:2, A Blok, Kat 9, Daire 92, Çankaya, Ankara, Türkiye</p> <p>Antalya Project Information Office: Orta Belek Caddesi No:7, Kapi no: 9, Serik, Antalya, Türkiye</p>
Phone (toll free line)	+90 850 202 07 07
Mobile Phone (SPV – CLOs)	+90 530 978 78 42 +90 539 935 16 46 +90 536 345 39 23
Grievance boxes and forms	Grievance and feedback boxes and forms are placed and maintained by the SPV in all affected settlements, at relevant work and mobilisation sites, and in mobile Project vehicles
Social media	<p>Linkedin: https://www.linkedin.com/company/antalyaalanyaotoyolu/</p> <p>Instagram: https://www.instagram.com/antalyaalanyaotoyolu/</p> <p>Youtube: https://www.youtube.com/@AntalyaAlanyaOtoyolu</p>



www.antalyaalanyaotoyolu.com.tr



ANNEX-5.B: GLAC – Affected Lands&Houses



ANTALYA – ALANYA MOTORWAY PROJECT

RESETTLEMENT ACTION PLAN (RAP) GUIDE TO LAND ACQUISITION AND COMPENSATION (GLAC)

– AFFECTED LANDS AND HOUSES –



OCTOBER 2025

REVISION 1

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A. INTRODUCTION

1. What is Antalya-Alanya Motorway Project?

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

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

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



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

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

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

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

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

4. What are the Project’s Applicable International Standards

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

The following international standards are applicable to the Project:

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

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

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

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

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

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

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

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

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

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

7. How the RAP has been reviewed independently?

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

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

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

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

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

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

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

B. PROJECT DESCRIPTION

9. What are the key Project Components?

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

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

10. Are there any associated facilities of the Project?

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

11. What is Motorway Expropriation Corridor?

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

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

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

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

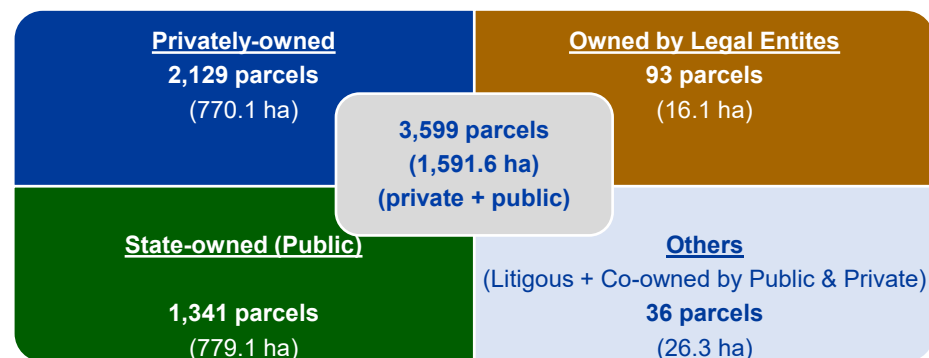
12. Which Settlements are affected within the Expropriation Corridor?

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

- **Serik (12 neighbourhoods):** Deniztepesi, Sariabali, Yukarikocayata, Asagikocayatak, Kayaburnu, Dikmen, Candir, Asagicatma, Cumali, Burmahanci, Urundu, Belpinar
- **Manavgat: (34 neighbourhoods):** Cakis, Tasagil, Gundogdu, Hocalar, Yavrudogan, Colakli, Seki, Kalemler, Evren, Ilica, Yenikoy, Siseler, Evrenleryahsi, Dolbazlar, Yukariisiklar, Dikmen, Bucakseyhler, Ulukapi, Asagisiklar, Demirciler, Karaoz, Aksaz, Haciali, Cevizler, Sulek, Hacıisali, Hacıobası, Kızılot, Uzunlar, Kadilar, Orenşehir, Yalçidibi, Odaonu, Karakaya
- **Alanya (11 neighbourhoods):** Alara, Cakallar, Incekum, Avsallar, Akdam, Turkler, Payallar, Emisbeleni, Toslak, Telatiye, Elikesik

13. How many Parcels are Affected?

There are **3,599 private, legal entity, and public (state-owned)** parcels to be acquired **within Project's expropriation corridor**.



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

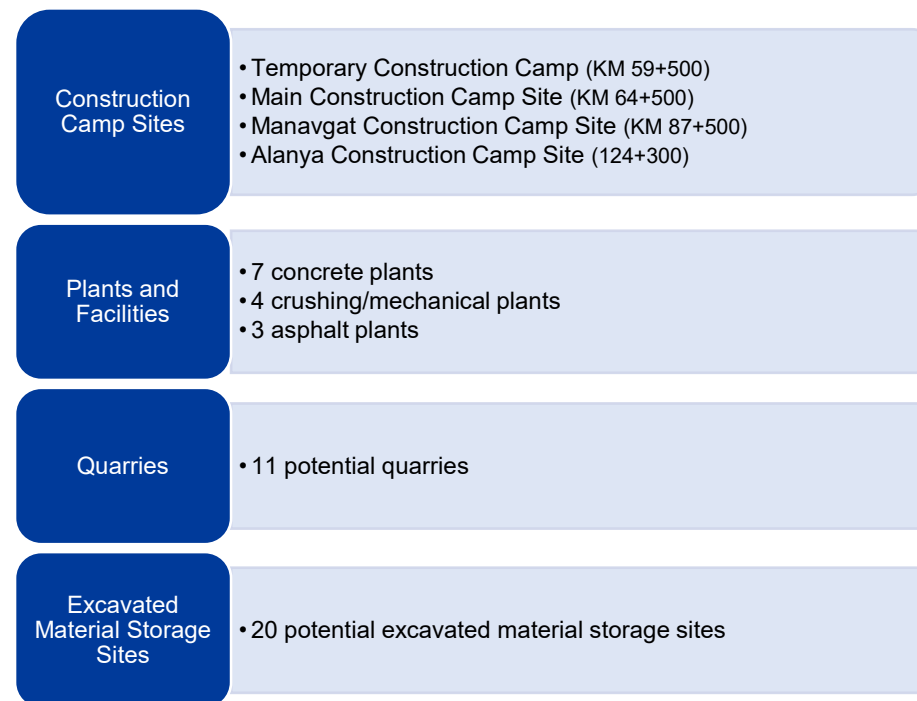
The majority of the affected parcels are registered as **agricultural land, road, and forest**.

Number of Parcels per Land Registry Type (3,599 parcel)	Area of Parcels per Land Registry Type (1,591.6 ha parcel)
• Agricultural (2,507 parcel)	• Agricultural (825.6 ha)
• Road (258 parcel)	• Forest (553.5 ha)
• Forest (149 parcel)	• Road (53 ha)
• Land with structures (148 parcel)	• Land with structures (42.2 ha)
• Constructible plot (87 parcel)	• Constructible plot (9.1 ha)
• Orchard (101 parcel)	• Orchard (21.7 ha)
• Raw soil (83 parcel)	• Raw soil (15.8 ha)
• Litigious (13 parcel)	• Litigious (12.2 ha)
• Pasture (3 parcel)	• Pasture (0.2 ha)
• Others (250 parcel)	• Others (58.3 ha)

15. Which temporary facilities will be required during construction?

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

A list of planned facilities is included in the RAP.



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

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

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

17. What are key milestones in the Project schedule?

No	Key Milestones / Tasks	Date
0	BOT Contract Signing, Site Delivery	14 October 2024
1	Expropriation	
1.1	Start of inventory of assets and valuation study commenced by appointed valuation contractor	November 2024
1.2	Start of expropriation procedures – through Article 8 negotiations – by KGM	February 2025
1.3	Completion of valuation	Q4 2025 (<i>target</i>)
1.4	Completion of Article 8 negotiations as part of expropriation procedures undertaken by KGM	
	Phase 1: KM 52 – 56; KM 74 – 104; KM ~64 (O&M Centre), KM ~80 (Concrete Plant)	February – August 2025 (completed)
	Phase 2: KM 56 – 74; KM 104 – 116; Connection Roads: Manavgat East, D-400, Serik	September 2025 – January 2026 (<i>target</i>)
	Phase 3: KM 116 – 141; Connections roads: Taşağıllı, Manavgat, Alarahan and Konaklı	April 2026 (<i>target</i>)
2	E&S Studies and Finance Agreement	
2.1	Start of ESIA Package studies	March 2024
2.2	Start of RAP studies	April 2025
2.3	ESIA Package Disclosure by SPV, Lenders (60 days)	Q2 and Q3 2025
2.4	Finance Agreement Signing	6 October 2025
3	Construction Works	36 months after Signing
3.1	Land entry by the Project for design-related activities	November 2024
3.2	Site Mobilisation and Start of Construction	March 2025
3.3	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
	KM 52+000 – 80+000	November 2027 (<i>target</i>)
	KM 80+000 – 114+750	January 2028 (<i>target</i>)
	KM 114+750 – 141+705	November 2027 (<i>target</i>)
3.4	Tunnels, Viaducts, Superstructure, O&M Centre, Motorway Service Facilities (MSFs) and Other Secondary Works	March 2028
4.	Motorway Commissioning	Within 36 months from the date of signing the finance agreement

C. LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS

18. What is the status of land acquisition?

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

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

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

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

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

Planned Schedule of Article 8 Negotiation Meetings

Negotiation Meeting Date	Settlements
Completed between February – September 2025	<u>Serik</u> : Deniztepesi, Sariabalı <u>Manavgat</u> : Şişeler, Taşağıllı, Aksaz, Cevizler, Demirciler, Hacıali, Hacısalı, Hacıobası, Karaöz, Sülek, Aşağıışıklar, Bucakşeyhler, Dikmen, Ulukapı, Yukarıışıklar, Dolbazlar, Evrenleryavşı, Kalemler, Seki, Yeniköy, Şişeler
October 2025 (planned)	<u>Manavgat</u> : Kadılar, Karakaya, Odaönü, Örenşehir, Uzunlar, Yalçıdibi
November 2025 (planned)	<u>Serik</u> : Aşağıkocayatak, Çandır, Dikmen, Kayaburnu, Yukarıkocayatak <u>Manavgat</u> : Çakış, Çolaklı, Gündoğdu, Hocalar, Taşağıllı, Yavrudoğan
November 2025 (planned)	<u>Manavgat</u> : Hacıobası, Kızılot
January – February 2026 (planned)	<u>Serik</u> : Deniztepesi, Sariabalı, Üründü, Belpınarı, Burmahancı, Cumalı, Aşağıçatma
February – April 2026 (planned)	<u>Manavgat</u> : Evren, Ilıca <u>Alanya</u> : Alara, Çakallar, Akdam, İncekum, Avsallar, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elikesik

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. EXPROPRIATION PROCESS IN LINE WITH EXPROPRIATION LAW

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

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

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

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

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

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

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

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

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

Affected Asset	Eligible PAPs
Private Parcels	<ul style="list-style-type: none"> • Owners of lands, trees, crops, structures on affected lands • Formal land users (with official documentation) for trees, structures, crops on affected lands • Informal land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19) • Litigant owners/shareholders or formal and informal users of litigious parcels
Public Lands	<ul style="list-style-type: none"> • Formal public land users (who have official documentation, e.g. adequate pay "ecrimisil", rental agreement) for trees, crops, and structure • Informal public land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19)
Houses	<ul style="list-style-type: none"> • The owners of the houses (in case of multiple shareholders, this refers to the actual owner of the house, subject to the consent of other shareholders who recognise the ownership of the actual owner) • All land shareholders (in proportion to their shares) in case of multiple land ownership, when there is no consent from other shareholders recognising the ownership of the actual structure owner
Greenhouses	<ul style="list-style-type: none"> • Owner of the greenhouse – owner/shareholder of the private land • Owner of the greenhouse – formal tenant of the land, owner of the greenhouse • Formal tenant of the greenhouse on lands owned by others (not the owner of the greenhouse) • Owner of the greenhouse – informal user of treasury lands (with no official documentation for land use but can prove their ownership of the structure) • Owner of the greenhouse – informal user of forest and pasture lands or with no official documentation proving their ownership of the structure

E. COMPENSATION AND ENTITLEMENTS UNDER RAP TO MEET INTERNATIONAL STANDARDS

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

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

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

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

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

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

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

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

28. What is Cut-off Date for Eligibility?

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

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

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

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

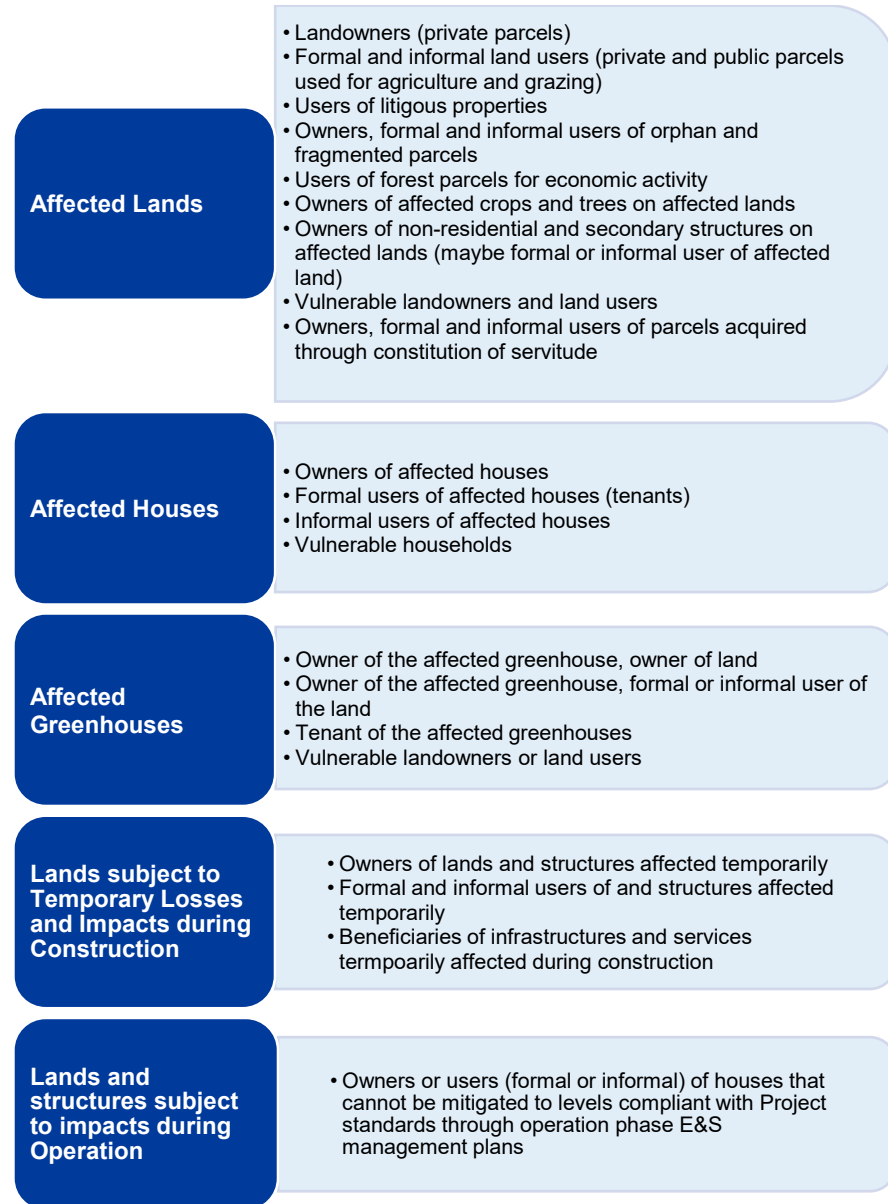
All people affected by the Project and owning and/or using (formally or informally) the affected lands and assets **before the cut-off dates** defined in the RAP are eligible for compensation and assistance under RAP.

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

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

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

The eligibility categories identified in the RAP are as follows:



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

• Owners and Shareholders of Affected Private Parcels

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

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

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

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

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

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

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

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

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

- **Litigant Owners and Shareholders:**

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

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

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

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

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

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

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

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

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

- **Owners of Affected Crops**

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

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

- **Owners of Affected Trees**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

• Owners of Affected House on Private Parcels

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- **Physically Displaced Households with Vulnerable Members**

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

33. What are the Specific RAP Entitlements specific for the Owners and Users of [Affected Greenhouses](#)?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Where needed or requested, support to individuals in opening bank accounts to facilitate direct access to compensation and support payments.
- Priority for unemployed female members of physically and/or economically displaced households who are actively seeking employment.
- Training programmes to be designed and delivered by the external Agricultural Consultancy Companies
- Women-specific training programmes

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

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

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

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

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

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

Livelihood restoration and improvement measures will be updated as necessary.

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

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

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

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

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

Affected Agricultural Land Users

- Official documentation of ownership for the affected assets such as lands, greenhouses, etc. (e.g., land registry records/title deeds, inheritance documents, ownership documents) (*for owners*)
- Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor (*for owners, formal and informal users*)
- Tenancy agreements (*for formal users*)
- Evidence/confirmation of land use provided by settlement heads, community leaders, and other credible witnesses or third parties (*for informal users*)
- Documentation on transaction costs (*for owners, formal and informal users*)
- Evidence of expenditures made for fixed investments and improvements (*for greenhouse owners*)

Affected Houses

- Title deeds for affected land and structures (*for owners*)
- Documentation on expenses such as moving and transaction costs, fees paid to authorities and service providers, and price quotes from vendors and other transaction costs (*for owners, formal and informal users*)
- Evidence of expenditures made for fixed investments and improvements (*for owners, formal and informal users*)
- Lease agreements and relevant documentation/confirmation from the structure owner, mukhtar or other credible witnesses (*for formal users - tenants*)

F. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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

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

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

- The RAP (including the GLAC) **will be published in English and Turkish on the SPV and Lenders' websites**, in line with their disclosure policies and timelines.
- This GLAC, explaining the entitlements and next steps clearly to all affected people and stakeholders, will be delivered to the offices of mukhtars and directly to affected people and vulnerable individual in each settlement.
- The **hard copies (in Turkish)** of the final RAP and GLAC will be made available at the following locations: Project Information Office in Serik, Project's Construction Camp Sites, and Offices of the settlement heads (mukhtars)
- The **SPV CLOs will engage individually with affected households that include vulnerable members** to distribute the GLAC and communicate the key information from the RAP, as applicable.
- Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions prior to Article 8 negotiation meetings. **Priority will be given to settlements where land was or will be expropriated in the 2025, as listed in the table below under the "[Priority Settlements to be covered during the Disclosure Period](#)".**
- Meetings in other settlements will continue throughout the first year of RAP implementation, in alignment with the expropriation and construction schedules.
- **The Project will continue engaging with affected people throughout the 36-month RAP implementation period** in line with the RAP Stakeholder Engagement Action Plan for RAP.

G. PROJECT GRIEVANCE MECHANISM

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

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

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

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

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

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

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

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

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

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

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

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

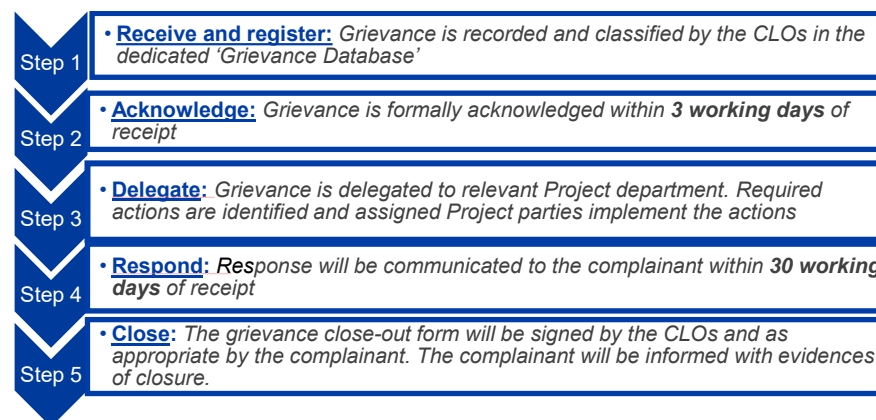
Through this mechanism, stakeholders can submit their concerns using the **channels listed below in Section H "CONTACT INFORMATION FOR STAKEHOLDERS"**

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

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

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

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



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

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

H. CONTACT INFORMATION FOR STAKEHOLDERS

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

Project website	www.antalyaalanyaotoyolu.com.tr
E-mail	info@antalyaalanyaotoyolu.com
Mail	<p>Ankara – Centre: Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye</p> <p>Ankara – Office: Söğütözü Cd. Koç Kuleleri No:2, A Blok, Kat 9, Daire 92, Çankaya, Ankara, Türkiye</p> <p>Antalya Project Information Office: Orta Belek Caddesi No:7, Kapi no: 9, Serik, Antalya, Türkiye</p>
Phone (toll free line)	+90 850 202 07 07
Mobile Phone (SPV – CLOs)	+90 530 978 78 42 +90 539 935 16 46 +90 536 345 39 23
Grievance boxes and forms	Grievance and feedback boxes and forms are placed and maintained by the SPV in all affected settlements, at relevant work and mobilisation sites, and in mobile Project vehicles.
Social media	<p>Linkedin: https://www.linkedin.com/company/antalyaalanyaotoyolu/</p> <p>Instagram: https://www.instagram.com/antalyaalanyaotoyolu/</p> <p>Youtube: https://www.youtube.com/@AntalyaAlanyaOtoyolu</p>



www.antalyaalanyaotoyolu.com.tr

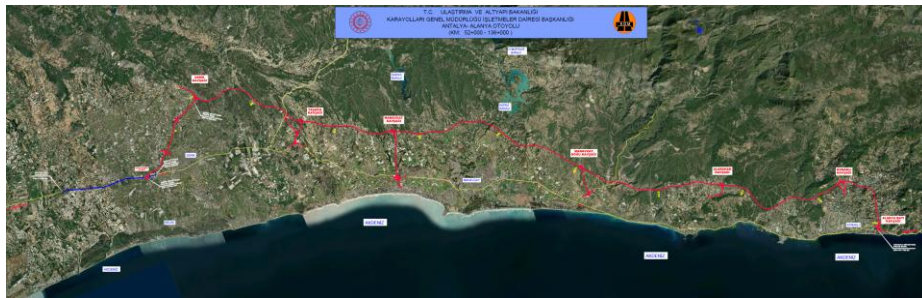


ANNEX-5.C: GLAC – Affected Businesses



ANTALYA – ALANYA MOTORWAY PROJECT

RESETTLEMENT ACTION PLAN (RAP) GUIDE TO LAND ACQUISITION AND COMPENSATION (GLAC) – AFFECTED BUSINESSES –



OCTOBER 2025

REVISION 1

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A. INTRODUCTION

1. What is Antalya-Alanya Motorway Project?

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

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

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



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

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

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

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

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

4. How the Project is Financed and what are the Project's Applicable International Standards?

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

The following international standards are applicable to the Project:

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

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

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

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

The **RAP is a living document** and will be updated as necessary. It is disclosed in Turkish and English under the Project's ESIA Package at the Project website (www.antalyaalanyaotoyolu.com.tr).

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

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

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

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

7. How the RAP has been reviewed independently?

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

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

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

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

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

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

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

B. PROJECT DESCRIPTION

9. What are the key Project Components?

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

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

10. Are there any associated facilities of the Project?

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

11. What is Motorway Expropriation Corridor?

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

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

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

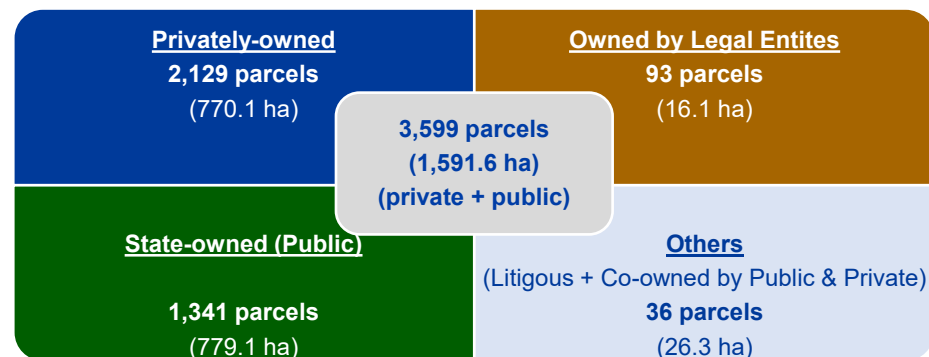
12. Which Settlements are affected within the Expropriation Corridor?

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

- **Serik (12 neighbourhoods):** Deniztepesi, Sariabali, Yukarikocayata, Asagikocayatak, Kayaburnu, Dikmen, Candir, Asagicatma, Cumali, Burmahanci, Urundu, Belpinar
- **Manavgat: (34 neighbourhoods):** Cakis, Tasagil, Gundogdu, Hocalar, Yavrudogan, Colakli, Seki, Kalemler, Evren, Ilica, Yenikoy, Siseler, Evrenleryahsi, Dolbazlar, Yukariisiklar, Dikmen, Bucakseyhler, Ulukapi, Asagisiklar, Demirciler, Karaoz, Aksaz, Haciali, Cevizler, Sulek, Hacıisali, Hacıobası, Kızılot, Uzunlar, Kadilar, Orenşehir, Yalcidibi, Odaonu, Karakaya
- **Alanya (11 neighbourhoods):** Alara, Cakallar, Incekum, Avsallar, Akdam, Turkler, Payallar, Emisbeleni, Toslak, Telatiye, Elikesik

13. How many Parcels are Affected?

There are **3,599 private, legal entity, and public (state-owned)** parcels to be acquired **within Project's expropriation corridor**.



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

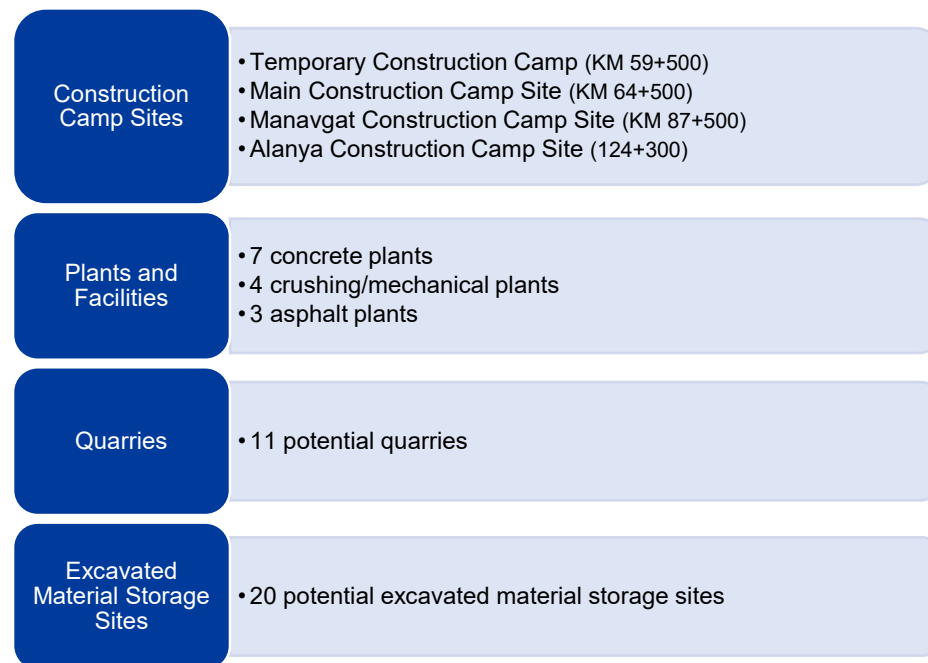
The majority of the affected parcels are registered as **agricultural land, road, and forest**.

Number of Parcels per Land Registry Type (3,599 parcel)	Area of Parcels per Land Registry Type (1,591.6 ha parcel)
• Agricultural (2,507 parcel)	• Agricultural (825.6 ha)
• Road (258 parcel)	• Forest (553.5 ha)
• Forest (149 parcel)	• Road (53 ha)
• Land with structures (148 parcel)	• Land with structures (42.2 ha)
• Constructible plot (87 parcel)	• Constructible plot (9.1 ha)
• Orchard (101 parcel)	• Orchard (21.7 ha)
• Raw soil (83 parcel)	• Raw soil (15.8 ha)
• Litigious (13 parcel)	• Litigious (12.2 ha)
• Pasture (3 parcel)	• Pasture (0.2 ha)
• Others (250 parcel)	• Others (58.3 ha)

15. Which temporary facilities will be required during construction?

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

A list of planned facilities is included in the RAP.



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

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

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

17. What are key milestones in the Project schedule?

No	Key Milestones / Tasks	Date
0	BOT Contract Signing, Site Delivery	14 October 2024
1	Expropriation	
1.1	Start of inventory of assets and valuation study commenced by appointed valuation contractor	November 2024
1.2	Start of expropriation procedures – through Article 8 negotiations – by KGM	February 2025
1.3	Completion of valuation	Q4 2025 (<i>target</i>)
1.4	Completion of Article 8 negotiations as part of expropriation procedures undertaken by KGM	
	Phase 1: KM 52 – 56; KM 74 – 104; KM ~64 (O&M Centre), KM ~80 (Concrete Plant)	February – August 2025 (completed)
	Phase 2: KM 56 – 74; KM 104 – 116; Connection Roads: Manavgat East, D-400, Serik	September 2025 – January 2026 (<i>target</i>)
	Phase 3: KM 116 – 141; Connections roads: Taşağıl, Manavgat, Alarahan and Konaklı	April 2026 (<i>target</i>)
2	E&S Studies and Finance Agreement	
2.1	Start of ESIA Package studies	March 2024
2.2	Start of RAP studies	April 2025
2.3	ESIA Package Disclosure by SPV, Lenders (60 days)	Q2 and Q3 2025
2.4	Finance Agreement Signing	6 October 2025
3	Construction Works	36 months after Signing
3.1	Land entry by the Project for design-related activities	November 2024
3.2	Site Mobilisation and Start of Construction	March 2025
3.3	Earthworks and Construction of Engineering Structures (incl. Connection Roads)	January 2028
	KM 52+000 – 80+000	November 2027 (<i>target</i>)
	KM 80+000 – 114+750	January 2028 (<i>target</i>)
	KM 114+750 – 141+705	November 2027 (<i>target</i>)
3.4	Tunnels, Viaducts, Superstructure, O&M Centre, Motorway Service Facilities (MSFs) and Other Secondary Works	March 2028
4.	Motorway Commissioning	Within 36 months from the date of signing the finance agreement

C. LAND ACQUISITION STATUS AND DISPLACEMENT IMPACTS

18. What is the status of land acquisition?

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

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

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

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

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

Planned Schedule of Article 8 Negotiation Meetings

Negotiation Meeting Date	Settlements
Completed between February – September 2025	<u>Serik</u> : Deniztepesi, Sariabalı <u>Manavgat</u> : Şişeler, Taşağıl, Aksaz, Cevizler, Demirciler, Hacıalı, Hacısalı, Hacıobası, Karaöz, Sülek, Aşağıışıklar, Bucakşeyhler, Dikmen, Ulukapı, Yukarıışıklar, Dolbazlar, Evrenleryavşı, Kalemler, Seki, Yeniköy, Şişeler
October 2025 (planned)	<u>Manavgat</u> : Kadılar, Karakaya, Odaönü, Örenşehir, Uzunlar, Yalçıdibi
November 2025 (planned)	<u>Serik</u> : Aşağıkocayatak, Çandır, Dikmen, Kayaburnu, Yukarıkocayatak <u>Manavgat</u> : Çakış, Çolaklı, Gündoğdu, Hocalar, Taşağıl, Yavrudoğan
November 2025 (planned)	<u>Manavgat</u> : Hacıobası, Kızılot
January – February 2026 (planned)	<u>Serik</u> : Deniztepesi, Sariabalı, Üründü, Belpınarı, Burmahancı, Cumalı, Aşağıçatma
February – April 2026 (planned)	<u>Manavgat</u> : Evren, Ilica <u>Alanya</u> : Alara, Çakallar, Akdam, İncekum, Avsallar, Türkler, Payallar, Emişbeleni, Toslak, Telatiye, Elkesik

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

D. EXPROPRIATION PROCESS IN LINE WITH EXPROPRIATION LAW

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

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

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

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

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

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

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

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

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

Affected Asset	Eligible PAPs
Private Parcels	<ul style="list-style-type: none"> • Owners of lands, trees, crops, structures on affected lands • Formal land users (with official documentation) for trees, structures, crops on affected lands • Informal land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19) • Litigant owners/shareholders or formal and informal users of litigious parcels
Public Lands	<ul style="list-style-type: none"> • Formal public land users (who have official documentation, e.g. adequate pay "ecrimisil", rental agreement) for trees, crops, and structure • Informal public land users who have evidence of structure and tree ownership on affected lands (eligible under Exp. Law - Art. 19)
Business Structures	<ul style="list-style-type: none"> • Owners of affected business structures • Formal (tenants) or informal users affected business structures

E. COMPENSATION AND ENTITLEMENTS UNDER RAP TO MEET INTERNATIONAL STANDARDS

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

In addition to the compensation provided by KGM in accordance with the Expropriation Law, **the SPV implements supplementary compensation and livelihood restoration measures under the RAP** for the affected businesses.

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

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

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

28. What is Cut-off Date for Eligibility?

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

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

The SPV posts the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions. These are posted in the offices of the mukhtars, local coffee houses, and other appropriate public venues within the respective affected settlements.

The affected businesses are also individually notified by the SPV.

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

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

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

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

The eligibility categories for affected lands and businesses identified in the RAP are as follows:

Affected Lands	<ul style="list-style-type: none">• Landowners (private parcels)• Owners and users of litigious properties• Owners of non-residential and secondary structures on affected lands (maybe formal or informal user of affected land)• Vulnerable landowners and land users
Affected Businesses	<ul style="list-style-type: none">• Formal employers (owner or tenant at the affected business structure)• Informal employers (owner or tenant at the affected business structure)• Employees of the affected businesses (formal or informal)• Vulnerable employers and employees

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

For detailed information, please refer to the **GLAC for affected lands**.

31. What are the RAP Entitlements for Owners of Affected Businesses that will be permanently resettled?

- **Business owners (Employers) – who are “owners” of the relocated business structure**

In accordance with the Expropriation Law, cash compensation by KGM is provided to structure owners. Depreciation is applied. No compensation is provided by KGM for loss of income.

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

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Top-up cash compensation** to cover the amount deducted for depreciation by KGM and achieve full replacement cost.
- **Pre-Location Financial Support Package for Business Owners** (to be provided by the SPV through a milestone-based payment approach as outlined in the RAP):
 - ❖ Cash Compensation to cover cost of fixed (non-movable) investments/improvements (for portion not covered by KGM).
 - ❖ Moving allowance to cover disassembly, transportation and assembly costs of movable assets (for portion not covered by KGM).
 - ❖ Business relocation support package to cover other business-specific 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.
- **Post-relocation Financial Support Package for Business Owners** to compensate net income loss during the temporary business interruption period **up to 6 months** until successful reestablishment of the affected business – for eligible business owners, cash compensation support will be provided by the SPV on a monthly basis.

(Important Note to PAPs: Employers are required to provide financial and other relevant documentation upon the request of the SPV. These documents will be reviewed by the SPV to ensure a fair determination of the level and duration of support).

- Access to **External Business Advisory Services** for 36 months.

- **Business owners (Employers) – who are “tenants” at the relocated business structure**

As per the Expropriation Law, cash compensation is provided to structure owners. If both the owner and the tenants provide their consent, tenants may be compensated by KGM for the non-movable and movable assets determined to be in their ownership. No compensation is provided by KGM for loss of income.

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

- Notification at least **three months in advance of the start of expropriation** (which is approximately six months before land entry).
- **Pre-Location Financial Support Package for Tenant Business Owners** (to be provided by the SPV through a milestone-based payment approach as outlined in the RAP):
 - ❖ Cash Compensation to cover cost of fixed (non-movable) investments/improvements made by the tenants (for portion not covered by KGM).
 - ❖ Moving allowance to cover disassembly, transportation and assembly costs of movable assets (for portion not covered by KGM).
 - ❖ Business relocation support package to cover other business-specific relocation-related expenses including rental allowance (three-month rent allowance, based on the market rental rate of the replacement business structure to be rented), real estate agent service fee (equivalent to the market rental rate of the replacement business structure to be rented), and allowance for other relocation related expenses, which are specific to each business (such as environmental permits, H&S related permits and approvals, etc.).
- **Post-relocation Financial Support Package for Tenant Business Owners** to compensate net income loss during the temporary business interruption period **up to 6 months** until successful reestablishment of the affected business – for eligible business owners, cash compensation support will be provided by the SPV on a monthly basis. to affected business owners to compensate net income loss during the temporary business interruption period (**6 months**).

Important Note to PAPs: Employers are required to provide financial and other relevant documentation upon the request of the SPV. These documents will be reviewed by the SPV to ensure a fair determination of the level and duration of support.

- Access to **External Business Advisory Services** for 36 months.

- **Business owners (Employers) Business owners – which would terminate operations (business shut-down) due to relocation**

As per the Expropriation Law, no compensation is provided by KGM for loss of income.

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.).

Affected business owners and their employees will be given priority consideration for employment opportunities generated by the Project and have access to the External Business Advisory Services to be arranged 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.

32. What are the RAP Entitlements for Owners of Affected Businesses that will not relocate but face partial loss of structures at the existing premises?

As per the Expropriation Law, cash compensation is provided to structure owners. Depreciation is deducted.

The owners of affected businesses employers (owner or tenant at the affected structure) are entitled to receive the following **additional** compensation and assistance from the SPV under the RAP:

- **Top-up cash compensation** to cover the amount deducted for depreciation by KGM and achieve full replacement cost (only for structure owners)
- **Support through construction teams 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, where appropriate.
- **Assistance for relocating affected movable structures and auxiliary facilities** to another location within the existing premises or nearby surroundings – in coordination and consultation with the business owner to minimise any interruption to business operations.
- Access to **External Business Advisory Services** for 36 months.
- **Monitoring requests and managing grievances** to identify any impact on the business (e.g. access restrictions caused by construction or during operation) and develop and implement corrective actions in consultation with the business owner.

33. What are the RAP Entitlements for the Formal and Informal Employees of Affected Businesses?

As per the Expropriation Law, no compensation is provided by KGM to formal or informal employees.

Employment status and conditions of employees will be identified by the SPV **three** months before start of expropriation.

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

- **Formal and Informal Employees of relocated businesses affected by temporary income loss**
 - **Gross salary support** (up to **three** months) to avoid temporary interruption of employee salary payments due to relocation (to be assessed and identified by the External Business Advisor(s) of SPV based on monitoring outcomes)

If the RAP monitoring (internally by SPV and externally by IESC) 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.
- **Formal and Informal Employees affected by permanent income loss (due to business shut-down, dismissal, etc.)**
 - **Review and evaluation of permanent income loss cases by External Business Advisor(s) of SPV** and provision of following support when it is verified that permanent income loss (that take place within 6 months after the relocation) is directly related/inevitable due to relocation of the business:
 - ❖ **For formal employees:** 3 months of gross salary support by SPV in addition to severance payments, unpaid annual leaves and other gained benefits to be provided by their official employers in line with the Labour Law.
 - ❖ **For informal employees:** 3 months of gross salary support by SPV plus priority for employment in the Project construction (if they meet the Project employment criteria) and other employee-specific measures to be developed by the SPV (e.g. specific skill trainings to increase opportunity for employment in similar or other sectors) and implemented by SPV on a case-by-case basis.)

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

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

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

35. What Livelihood Restoration, Improvement, and Assistance Packages are available to the Owners of Affected Businesses (Employers) in related to their affected business operations?

Livelihood restoration, improvement, and assistance will be provided to both employers and employees – whether formal or informal – of businesses affected by the Project. These measures aim to support the successful re-establishment of relocated businesses at their new locations, reduce business interruptions during the transition and prevent potential shutdowns, and help restore (or where possible, improve) their income levels.

The support packages available to affected businesses will include the following measures:

<u>Livelihood Restoration Improvement and Assistance Packages for Affected Businesses</u>				
<u>Package 1</u> External Business Consultancy Support for Relocation (for 36 months)	<u>Package 2</u> Pre-relocation Financial Support Package to Business Owners	<u>Package 3</u> Post-relocation Financial Support Package to Business Owners	<u>Package 5</u> Financial Support Package to Employees	<u>Package 6</u> Priority in Project Employment

The SPV will retain an external Business Consultancy Company (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.

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

During RAP implementation, the SPV will proactively engage with the affected people, including businesses, to identify potential eligible people and inform them about the livelihood restoration, improvement and assistance measures available to them and requested documents.

The eligibility of affected business employers and employees to benefit from RAP entitlements will be evaluated by the SPV on a case-by-case basis.

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

The documentation requested from PAPs for the evaluation of their eligibility for RAP entitlements may include, but is not limited to, the following.

It should be noted that this list is not exhaustive, and the SPV reserves the right to request additional documentation at any stage of the eligibility assessment process:

Affected Businesses

- Title deeds for affected business structures (*for structure owners*)
- Lease agreements (*for formal users - tenants of land or business structure*)
- Legal company documentation for affected businesses (*for formal business owners*)
- Financial records, accounting documents, social security registration, permitting documentation, etc. (*for formal business owners*)
- Information and documentation on informal employees in relation to their informal employment terms and duration, salaries, residency or work related documentation of foreign workers, etc. (*for formal and informal business owners*)
- 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 (*for formal and informal business owners*)
- Evidence of expenditures made for fixed investments and improvements (*for formal and informal business owners*)

F. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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

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

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

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

G. PROJECT GRIEVANCE MECHANISM

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

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

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

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

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

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

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

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

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

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

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

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

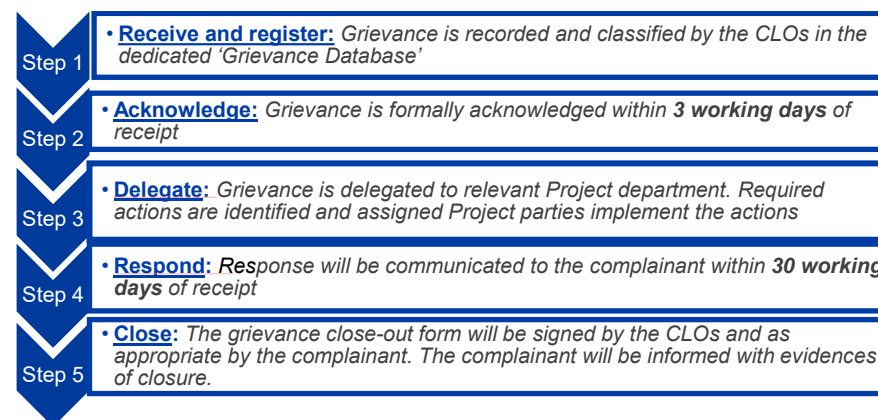
Through this mechanism, stakeholders can submit their concerns using the **channels listed below in Section H "CONTACT INFORMATION FOR STAKEHOLDERS"**

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

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

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

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



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

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

H. CONTACT INFORMATION FOR STAKEHOLDERS

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

Project website	www.antalyaalanyaotoyolu.com.tr
E-mail	info@antalyaalanyaotoyolu.com
Mail	<p>Ankara – Centre: Kazım Özalp Mahallesi Hafta Sokak No:9, Çankaya, Ankara, Türkiye</p> <p>Ankara – Office: Maidan İş Yaşam Merkezi, Mustafa Kemal Mah. 2118. Cad. B Blok, Kat 10, Daire 105, Çankaya, Ankara, Türkiye</p> <p>Antalya Project Information Office: Orta Belek Caddesi No:7, Kapi no: 9, Serik, Antalya, Türkiye</p>
Phone (toll free line)	+90 850 202 07 07
Mobile Phone (SPV – CLOs)	+90 530 978 78 42 +90 539 935 16 46 +90 536 345 39 23
Grievance boxes and forms	Grievance and feedback boxes and forms are placed and maintained by the SPV in all affected settlements, at relevant work and mobilisation sites, and in mobile Project vehicles
Social media	<p>Linkedin: https://www.linkedin.com/company/antalyaalanyaotoyolu/</p> <p>Instagram: https://www.instagram.com/antalyaalanyaotoyolu/</p> <p>Youtube: https://www.youtube.com/@AntalyaAlanyaOtoyolu</p>



www.antalyaalanyaotoyolu.com.tr