



## Sanko Enerji Güney-1 Wind Power Plant Project

### Land Acquisition Plan (Plan no: LAP / GNY1-PLN-SOC-002)



**MGS PROJECT CONSULTANCY  
ENGINEERING TRADE LIMITED CO.**

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## 1 INTRODUCTION

Sanko Enerji is constructing a wind power plant consisting of 14 wind turbines with an installed capacity of 73.6 MWm/70 MWe. This Project is named Güney-1 Wind Power Plant Project ("Project") and located in Karacabey District of Bursa Province. The License Area of the Project is falls in the boundaries of Mudanya and Karacabey Districts; however, the Project footprint is only in Karacabey District.

### 1.1 Scope

The Project prioritised the purchase of land through open negotiations with the landowners. The total size of the land purchased via open negotiations is 18,294.47 m<sup>2</sup>. However, where the open negotiation cannot be achieved, privately-owned plots that are required for the Project are subjected to expropriation. These plots fall under the scope of this Land Acquisition Plan (LAP).

Potential impacts on income and livelihoods on local farmers due to the Project also fall under the scope of this Plan.

This Plan overlaps and cross linkages to Stakeholder Engagement Plan (including Internal and External Grievance Mechanism) (GNY1-PLN-SOC-001) and Traffic Management Plan (GNY-1-PLN-HSS-001).

### 1.2 Purpose

The objective of the LAP is to ensure that all individuals / households affected by land acquisition for the Project are compensated for their land and assets, which will enable them to attain a standard of living similar to and, if possible, better than the existing one. The LAP has been developed to prevent and mitigate the negative impacts of land acquisition and displacement and set out the entitlements of the different categories of affected individuals / households.

### 1.3 Definitions

**Land Acquisition:** Land acquisition includes both outright purchases of property and purchases of access rights, such as easements or rights of way.

**Resettlement:** Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or resources, and/or loss of access to assets or resources that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition and/or restrictions on land use.



**Involuntary resettlement:** Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition, or restrictions on land use, that result in displacement. This occurs in cases of: (i) lawful expropriation or restrictions on land use based on eminent domain; and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.

**Cut-off date:** Date of completion of the census and assets inventory of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and woodlots) established after the date of completion of the assets inventory, or an alternative mutually agreed on date, will not be compensated.

**Compensation:** Payment in cash or in kind for an asset or a resource that is acquired or affected by a project at the time the asset needs to be replaced.

**Project Affected People:** Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

**Stakeholder:** Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project

**Economic Displacement:** Loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources (land, water, or forest) resulting from the construction or operation of a project or its associated facilities.

**Physical Displacement:** Loss of shelter and assets resulting from the acquisition of land associated with a project that requires the affected person(s) to move to another location.

**Vulnerable People:** People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## 1.4 Abbreviations

<b>DCC</b>	Document Control Centre
<b>EHS</b>	Environmental, Health and Safety
<b>EHSS</b>	Environmental Health, Safety, and Social
<b>EMRA</b>	Energy Market Regulatory Authority
<b>ES</b>	Environmental and Social
<b>ESMS</b>	Environmental and Social Management System

<b>ETL</b>	Electricity Transmission Line
<b>IFC</b>	International Finance Corporation
<b>KPI</b>	Key Performance Indicator
<b>LAP</b>	Land Acquisition Plan
<b>LRF</b>	Livelihood Restoration Framework
<b>MGS</b>	MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti.
<b>MW</b>	Megawatt
<b>PS</b>	Performance Standards
<b>RAP</b>	Resettlement Action Plan
<b>SRS</b>	Social Responsibility Staff
<b>WPP</b>	Wind Power Plant

## 2 PROJECT LAND ACQUISITION

The total amount of land to be occupied during the construction is approximately 60 ha, most of which is forest land. Appropriation of the forest land which is approximately 31 ha will be completed before commencement of construction works. Approximately 21 ha of the total Project area is Public Property and constitution of servitude has been acquired in the name of Sanko Enerji by putting annotation onto the title deed. Appropriation process for the rest of the Public Property land is still in progress. Approximately, 7.6 ha of the land to be acquired by the Project is registered as private property 1.8 ha of which has been acquired by Sanko Enerji via open negotiation. Rest 5.8 ha of private property is subjected to expropriation by EMRA and expropriation process of approximately 1.8 ha has been completed.

The Project requires land acquisition for the following components:

- 14 wind turbines
- Hardstanding areas (crane pads and access tracks)
- Widened on-site roads, passing places on site roads for large scale vehicles and temporary platforms / areas for vehicle parking and manoeuvring
- Underground cables for on-site electrical infrastructure
- Control / administration building, substation and switchyard
- Construction camp site / offices and temporary storage area
- Part of the transport access route to T12 and T14
- ETL with 5 poles

### 2.1 Lands Previously Acquired

Sanko Enerji acquired some lots of privately owned lands for the Project, through sale purchase contracts without resorting the expropriation or other compulsory purchase procedures. Information related to these lots are given in Table 1. Also, satellite view of the acquired lands is given in Figure 1.



Sanko Enerji negotiated the sale of several privately-owned plots of land for the use of the Project. The total size of the land purchased is 18,294.47 m<sup>2</sup>.

As seen from Table 1, the previously purchased land was owned by a single user with a single share and was not leased or used by another party. Additionally, there were no structures that is affected by the purchase of the land.



Table 1 Information on Previously Acquired Private Lands

Neighbourhood	Parcel Number	Previous Landowners		Area of the Lot (m <sup>2</sup> )	Area of the Land to be Acquired (m <sup>2</sup> )	Purpose of the Acquisition	Is there affected structures?	Is the land leased by another party or used unrecorded?	Is there affected assets, trees, products etc. of unauthorised users?	Is the land-based activity an important source of income for the owner or land user?
		Name	Share							
Muratli	246	Ersel Türk	Single	9800.00	9800.00	Switchyard	No	No	N/A	No
Muratli	247	Ersel Türk	Single	6150.00	6150.00	Switchyard	No	No	N/A	No
Muratli	1045	Ersel Türk	Single	12046.25	2344.47	On-site Road	No	No	N/A	No



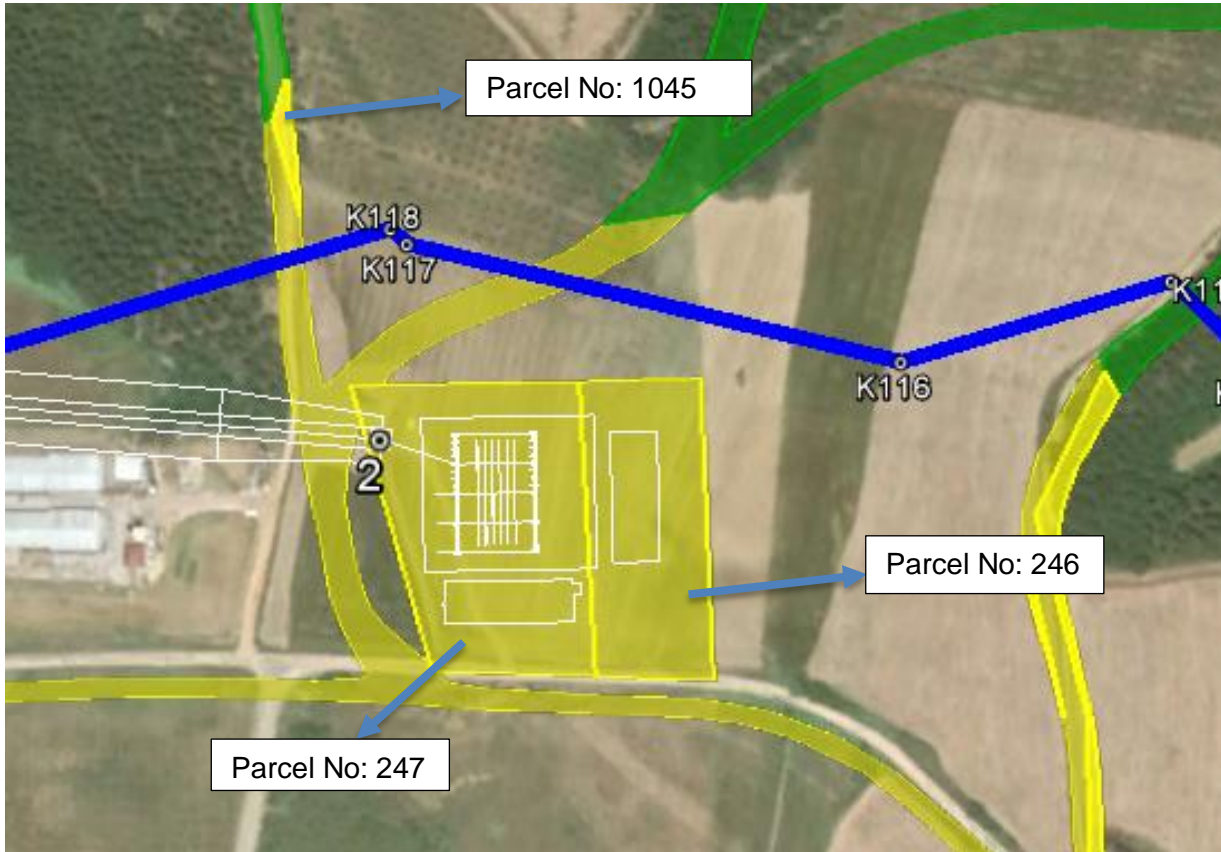


Figure 1 Previously Purchased Private Lands

## 2.2 Land in the Process of Acquisition

It was not possible to reach an agreement on the sale of all plots of lands which the Project requires for its components. Those plots are the subject of expropriation and it is those plots that fall under the scope of this Plan.

As per the Expropriation Law, EMRA, as the responsible government authority, is responsible to manage the expropriation process related to the Project. Once the expropriation process is completed according to the Turkish Expropriation Law, EMRA will share land and asset inventory, which will include detailed mapping of the area of expropriation, identified land parcels and information about land class and use, its owners (single or multiple shared), photos of the properties, types of agricultural crops, valuation of assets (if any), compensation provided, copy of agreement with landowners etc. with Sanko Enerji.

Based on the information gathered from EMRA, Sanko Enerji will assess the required scope for additional surveys (such as a census of affected assets and persons to establish a list of people with formal and informal land rights, and/or socio-economic survey to survey income sources and income levels of affected individuals, to calculate income and livelihood impacts arising from the project's land acquisition and to establish fair compensation rates and



livelihood restoration support), develop an Entitlement Matrix as per IFC requirements, determine the difference in compensation and assistance required by Turkish law and the IFC Performance Standards, and compensate for the difference between the two. Where land acquisition results in economic displacement, livelihood restoration measures will be provided to restore income and standards of living of displaced persons to pre-project levels.

A cut-off date for eligibility according to national legislation will be established. Information regarding the cut-off date will be well documented and disseminated throughout the Project area.

Table 2 presents the information of completed expropriation process of the Project. Expropriation process for most of the lands that will be acquired is still in progress. According to the given table, there are 159 affected households from the expropriation conducted for the Project.

Table 2 Information on Previously Expropriated Lands

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
1	Zeynep Bay	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/166	İnkaya Neighbourhood	990	2,800.00	355.11	2444.89	14,278.57 TL	Road	No	No	No	Agriculture
2	Macide Algin	1/10	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/169	İnkaya Neighbourhood	994	1,650.00	319.67	1330.33	12,853.93 TL	Road	No	No	No	Agriculture
	Ayşe Balaban	1/5													
	Süreyya Zağlı	1/20													
	Tuncay Çetinkaya	1/20													
	Resmiye Duman	1/20													
	Sebile Baki	1/15													
	Osman Çetinkaya	1/10													
	Müşerref Çetinkaya	1/20													
	Fatma Taşci	1/20													
	Rahime Turan	1/15													
Seviye Güleç	1/20														
Ayşe Arslan	1/20														

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
	Recep Çeinkaya	1/15													
	Mehmet Emin Erdem	1/20													
3	Kadir Var	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/168	İnkaya Neighbourhood	993	1,980.00	442.36	1537.64	17,787.30 TL	Road	No	No	No	Agriculture
4	Nedim Kaya	3/16	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/165	İnkaya Neighbourhood	978	14,040.00	5.12	14,034.88	205.88 TL	Road	No	No	No	Agriculture
	Meryem Kaya	1/4													
	Serpil Kaya	3/64													
	Fatma İskeçeli	3/64													
	Ayşe Pişkin	3/16													
	Savet Kaya	3/64													
	Saniye Fidan	3/16													
	Serdar Kaya	3/64													
5	Ayşegül Hartlap	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/167	İnkaya Neighbourhood	992	3,910.00	418.88	3,491.12	16,843.16 TL	Road	No	No	No	Agriculture
6	Aziz Kaya	1/1	KARACABEY 1. ASLİYE HUKUK MAHKEMESİ	2020/174	İnkaya Neighbourhood	965	25,660.00	1,013.84	24,646.16	40,538.52 TL	Road	No	No	No	Agriculture
7	Sultan Ayas	1/28	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/215	İnkaya Neighbourhood	1112	12,640.00	3,822.99	8,817.01	131,513.91 TL	Turbine	No	No	No	Agriculture

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	Name of The Owner	Share													
	Ayşe Arslan	1/28													
	Osman Arslan	1/28													
	Bülent Doğru	1/112													
	Necmi Yılmaz	1/14													
	Fevziye Durmaz	1/7													
	Asuman Eren	1/28													
	Semih Vurdur	1/56													
	Rüveyde Demir	1/7													
	Eda İnan	1/7													
	Nihat Yılmaz	1/14													
	Yılmaz Arslan	1/35													
	Hamza Vurdur	1/28													
	Güler Sevinç	1/35													
	Recep Arslan	1/35													
	Hüseyin Arslan	1/35													
	Ridvan Arslan	1/35													
	Saniye Arslan	1/28													
Seda Ertan	1/56														
Ali Doğru	1/112														
Figen Zeybek	1/112														
Levent Doğru	1/112														
8	Vural Yaman	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/216	İnkaya Neighbourhood	1125	7680.00	368.48	7311.52	12,997.64 TL	Turbine	No	No	No	Agriculture
9	Vural Yaman	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/214	İnkaya Neighbourhood	1111	3280.00	2612.54	667.46	157,958.43 TL	Turbine	No	No	No	Agriculture
10	Tahir Başaran	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/213	İnkaya Neighbourhood	1108	4940.00	3.20	4936.80	18.26 TL	Turbine	No	No	No	Agriculture
11	Zülüha Durmuş	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/212	İnkaya Neighbourhood	1085	3620.00	400.74	3219.26	13,313.55 TL	Road	No	No	No	Agriculture

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
12	Erdem Türkan	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/211	İnkaya Neighbourhood	1084	6320.00	880.98	5439.02	29,647.67 TL	Road	No	No	No	Agriculture
13	Aysel Semiz	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/209	İnkaya Neighbourhood	1076	8880.00	786.49	8093.51	32,474.05 TL	Road	No	No	No	Agriculture
14	Remzi Durmuş	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/208	İnkaya Neighbourhood	1073	2360.00	14.81	2345.19	510.20 TL	Road	No	No	No	Agriculture
15	Ayşe Meşhur	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/206	İnkaya Neighbourhood	1071	6240.00	1102.02	5137.98	39,485.08 TL	Road	No	No	No	Agriculture
16	Mevlûde Önal	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/207	İnkaya Neighbourhood	1072	2040.00	49.60	1990.40	1,708.72 TL	Road	No	No	No	Agriculture
17	Yusuf Düş	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/204	İnkaya Neighbourhood	1069	1820.00	185.10	1634.90	6,376.70 TL	Road	No	No	No	Agriculture
18	Yusuf Uz	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/205	İnkaya Neighbourhood	1070	2660.00	168.18	2491.82	5,793.80 TL	Road	No	No	No	Agriculture
19	Ercan Çakir	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/163	İnkaya Neighbourhood	1067	1405.00	91.47	1313.53	3,151.14 TL	Road	No	No	No	Agriculture
20	Ali Osman Sakin	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/175	İnkaya Neighbourhood	1068	1940.00	238.95	1701.05	8,231.83 TL	Road	No	No	No	Agriculture
21	Mehmet Yılmaz	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/172	İnkaya Neighbourhood	1066	1376.00	106.42	1269.58	3,686.49 TL	Road	No	No	No	Agriculture
22	Hasip Belindir	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/173	İnkaya Neighbourhood	1062	10520.00	172.19	10347.81	5,463.08 TL	Road	No	No	No	Agriculture
23	Mustafa Turhan	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/171	İnkaya Neighbourhood	1065	2600.00	794.57	1805.43	27,502.08 TL	Road	No	No	No	Agriculture
24	Nurettin Baki	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/170	İnkaya Neighbourhood	1064	4360.00	2694.70	1665.30	112,251.03 TL	Turbine	No	No	No	Agriculture

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No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
25	Nurettin Baki	1/1	Karacabey 2 <sup>nd</sup> Civil Court of First Instance	2020/210	İnkaya Neighbourhood	1083	3440.00	10.59	3429.41	341.40 TL	Turbine	No	No	No	Agriculture
26	Ayşe Meşhur	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/164	İnkaya Neighbourhood	1063	14920.00	596.14	14323.86	30,875.47 TL	Turbine	No	No	No	Agriculture
27	Salih Eren	1/3	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/79 D,İŞ	Muratlı Neighbourhood	104	8050	872.41	7177.59	91,495.74 TL	Road	No No No	No No No	No No No	Agriculture Agriculture Agriculture
	Turan Eren	1/3													
	Cavit Eren	1/3													
28	Yılmaz Bilgin	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/80 D,İŞ	Muratlı Neighbourhood	101	15800.00	516.27	15283.73	42,979.48 TL	Road	No	No	No	Agriculture
29	Ahmet Altın	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/49 D,İŞ	Muratlı Neighbourhood	1068	25201.69	713.33	24488.36	31,201.05 TL	Road	No	No	No	Agriculture
30	Hüseyin Tekmen	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/48 D,İŞ	Muratlı Neighbourhood	245	27100.00	1451.04	25648.96	72,986.40 TL	Road	No	No	No	Agriculture
31	Meryem Bilgi	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/42 D,İŞ	Muratlı Neighbourhood	1703	6700.00	19.51	6680.49	682.65 TL	Road	No	No	No	Agriculture
32	Şaban Aydın	1/12	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/35 D,İŞ	İnkaya Neighbourhood	770	2105	354.16	1750.84	14,467.44 TL	Road	No	No	No	Agriculture
	Erol Aydın	1/12													
	Nihat Aydın	1/12													
	Fethiye Turhan	1/20													
	Şaban Durmuş	1/20													



No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
	Nigar Başar	1/20													
	Saffet Durmuş	1/4													
	Hafize Baki	1/20													
	Hediye Alper	1/20													
	Remzi Durmuş	1/4													
33	Enver Düş	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/34 D,İŞ	Muratlı Neighbourhood	769	2980.00	417.97	2562.03	17,074.07 TL	Road	No	No	No	Agriculture
34	Mehmet Aydoğdu	1/7	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/33 D,İŞ	İnkaya Neighbourhood	768	3180	347.71	2832.29	14,203.95 TL	Road	No	No	No	Agriculture
	Gülten Kamçı	1/7													
	Gülşen Bali	1/7													
	Nurten Uslu	1/7													
	Ayşe Sevinç	1/7													
	Fatma Aydoğdu	1/7													
Nurcan Turhan	1/7														
35	Saliha Satik	3/80	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/32 D,İŞ	İnkaya Neighbourhood	767	3220	371.24	2848.76	16,415.15 TL	Road	No	No	No	Agriculture



## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
	Nesibe Satik	3/80													
	Mehmet Satik	9/400													
	Saliha Satik	1/48													
	Salih Satik	3/80													
	Naci Satik	9/400													
	Gülnur Eraslan	1/48													
	Şahsene Başar	3/80													
	Salih Satik	1/48													
	Murat Satik	9/400													
	Nermin Güzeler	9/400													
	Gülay Meşhur	3/80													
	Zeliha Korkmaz	1/12													
	Gülay Meşhur	1/48													
	Meryem	3/20													

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
	Osman Turan	3/80													
	Gölnur Eraslan	3/80													
	Vasfiye Fideci	1/12													
	Mehmet Turan	3/80													
	Selimiye Genç	3/80													
	Vasfiye Fideci	3/20													
	Asiye Atagün	9/400													
36	Bahattin Polat	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/31 D,İŞ	İnkaya Neighbourhood	765	1385.00	351.21	1033.79	14,346.93 TL	Road	No	No	No	Agriculture
37	Fahriye Aydođdu	3/16	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/15 D,İŞ	İnkaya Neighbourhood	758	4440	442.58	3997.42	18,079.39 TL	Road	No	No	No	Agriculture
	Aysel Düş	1/64													
	İdris Aydođdu	3/16													
	Abdullah Aydođdu	1/16													
	Abdullah Aydođdu	3/16													
	Fahri Aydođdu	3/16													
	İdris Aydođdu	1/16													
	Mensure Demiral	1/64													
	Fahriye Gçven	1/16													
	Gülhan Erman	1/64													
Müjgan Turan	1/64														

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
38	Gülten Güleç	1/4	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/30 D,İŞ	İnkaya Neighbourhood	1001	3480	100.52	3379.48	4,106.24 TL	Road	No	No	No	Agriculture
	Fadime Topçu	3/16													
	Halil Güleç	3/16													
	Serap Kökmen	3/16													
	Salim Güleç	3/16													
39	Bilgi Ubuz	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/25 D,İŞ	İnkaya Neighbourhood	979	4700.00	935.02	3764.98	45,695.57 TL	Road	No	No	No	Agriculture
40	Kadir Turhan	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/24 D,İŞ	İnkaya Neighbourhood	989	1040.00	234.76	805.24	17,159.46 TL	Road	No	No	No	Agriculture
41	Sebahat Özkaya	1/8	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/23 D,İŞ	İnkaya Neighbourhood	988	1100	188.72	911.28	12,583.88 TL	Road	No	No	No	Agriculture
	Semia Elbir	3/160													
	Kasim Aydın	1/8													
	Mehmet Gönç	3/160													
	Metin Gönç	3/160													
	Recep Gönç	1/10													
	Seher Gönç	1/40													
	Güner Turan	3/200													
	Meliha Ekin	1/16													
	Nezahat Güleç	1/24													
	Rifki Turhan	3/200													
	Kadir Turhan	1/40													
	Hafize Demiral	3/200													
	Hafize Er	3/160													
	Semra Ateş	3/200													
	Ayşe Aydoğdu	1/10													
	Züriye Kaya	3/200													
	Beyhan Abi	1/24													
Fatma Gönç	3/80														
Feride Gönç	1/40														
Cevat Aydoğdu	1/16														
İlhan Aydın	1/24														
Nihaş Boztinaztepe	3/80														

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
42	Refik Korkmaz	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/22 D,İŞ	İnkaya Neighbourhood	987	980.00	149.51	830.49	9,253.83 TL	Road	No	No	No	Agriculture
43	Zeliha Korkmaz	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/14 D,İŞ	İnkaya Neighbourhood	986	1160.00	164.57	995.43	7,621.58 TL	Road	No	No	No	Agriculture
44	Ayşe Arslan	1/20	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/21 D,İŞ	İnkaya Neighbourhood	985	1520	117.38	1402.62	4,794.97 TL	Road	No	No	No	Agriculture
	Müşerref Çetinkaya	1/20													
	Rahime Turan	1/15													
	Mehmet Emin Erdem	1/20													
	Osman Çetinkaya	1/10													
	Fatma Taşçı	1/20													
	Süreyya Zağlı	1/20													
	Macide Algin	1/10													
	Ayşe Balaban	1/5													
	Seviye Güleç	1/20													
	Recep Çetinkaya	1/15													
	Resmiye Duman	1/20													
Tuncay Çetinkaya	1/20														
Sebile Baki	1/15														
45	Cevat Çetin Arslan	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/76 D,İŞ	Subaşı Neighbourhood	531	7050.00	1048.41	6001.59	45,857.45 TL	Road	No	No	No	Agriculture
46	Sait Savaş	1/3	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/77 D,İŞ	Subaşı Neighbourhood	532	14200	478.03	13721.97	20,909.03 TL	Road	No	No	No	Agriculture
	İbrahim Savaş	1/3													
	Ali Savaş	1/3													
47	Hüseyin Özlü	1/720	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/78 D,İŞ	Subaşı Neighbourhood	559	12000	252.09	11747.91	11,463.82 TL	Road	No	No	No	Agriculture
	Hafife Tekayakli	1/6													
	Hafife Tekayakli	2/45													
	Hüseyin Özlü	1/288													
	Lütfiye Ergül	1/144													

## Land Acquisition Plan

No	Owners		Court	Base No	Location	Parcel	Area (m <sup>2</sup> )	Expropriated (m <sup>2</sup> )	Remaining (m <sup>2</sup> )	Total Price (TL)	Reason of Expropriation	Is There Affected Structures?	Is the Land Leased by Another Party or Used Unrecorded?	Is There Affected Assets, Trees, Products etc. of Unauthorised Users?	Use of Land
	Name of The Owner	Share													
	Lütfiye Ergül	7/48													
	Türkan Kaya	5/288													
	Lütfiye Ergül	37/720													
	Lütfiye Ergül	5/144													
	Hafife Tekayakli	2/9													
	Türkan Kaya	5/144													
	Hüseyin Özlü	1/144													
	Lütfiye Ergül	5/144													
	Lütfiye Ergül	2/9													
	Türkan Kaya	1/144													
48	Gülten Güleç	1/4	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/67 D,İŞ	Taşpınar Neighbourhood	1580	1459.55	345.96	1113.59	33,291.73 TL	Road	No	No	No	Agriculture
	Serap Kökmen	3/16													
	Fadime Topçu	3/16													
	Salim Güleç	3/16													
	Halil Güleç	3/16													
49	Nuran Meşhur	1/4	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/68 D,İŞ	Taşpınar Neighbourhood	1662	14465.25	302.07	14163.18	30,818.20 TL	Road	No	No	No	Agriculture
	Fethiye Meşhur	1/4													
	Nuray Meşhur	1/4													
	Servet Meşhur	1/4													
50	Bursa Teknoloji Org Sanayi	1/1	Karacabey 1 <sup>st</sup> Civil Court of First Instance	2020/69 D,İŞ	Taşpınar Neighbourhood	1663	534.75	225.50	760.25	41,930.35 TL	Road	No	No	No	Agriculture

Completed land acquisition process for the public properties are given in Table 3.

Table 3 Completed Acquisition of Public Land

	Neighborhood	Type of the Real Estate	Area of the Land (m <sup>2</sup> )	Area of Acquired Land (m <sup>2</sup> )	Purpose of the Acquisition	Type of Acquisition
1	İnkaya Neighbourhood	Pastureland	1,768,500.00	96,981.70	Turbine point and Road	Constitution of Servitude
2	İnkaya Neighbourhood	Pastureland	500,000.00	19,822.50	Turbine point and Road	Constitution of Servitude
3	İnkaya Neighbourhood	Pastureland	1,258,797.00	25,531.24	Turbine point and Road	Constitution of Servitude
4	İnkaya Neighbourhood	Public-Cadastral Road	869.36	869.36	Turbine point	Utilization Permit Agreement
5	İnkaya Neighbourhood	Public-Cadastral Road	641.77	641.77	Road	Lease Agreement
6	İnkaya Neighbourhood	Public-Cadastral Road	178.59	178.59	Road	Lease Agreement
7	İnkaya Neighbourhood	Public-Cadastral Road	358.59	358.59	Road	Lease Agreement
8	İnkaya Neighbourhood	Public-Cadastral Road	462.65	462.65	Road	Lease Agreement
9	Muratlı Neighbourhood	Public-Cadastral Road	4,364.96	4,364.96	Road	Lease Agreement
10	Yenikaraağaç Neighbourhood	Public-Cadastral Road	1,014.02	1,014.02	Road	Lease Agreement
11	Yenikaraağaç Neighbourhood	Public-Cadastral Road	1,054.51	1,054.51	Road	Lease Agreement

The project owner made a forest preliminary permit application to the Forest Management Directorate for the lands that correspond to the forest areas in the project area. The information about the approved preliminary forest permission is given in Table 4.

## Land Acquisition Plan

Table 4 Preliminary Forest Permission Information

Permission Number	Forestry Regional Office	Forest Management Directorate	Num. of Divisions	Permitted Area (m <sup>2</sup> )	Permission Duration	Permission Ending Date	Preliminary Permission Price (TL)	Is the land leased or used by another party?
2019-16-291-192-00030 2019-16-291-007-00029	Bursa Forestry Regional Office	Karacabey Forest Management Directorate	148, 149, 150, 224, 225, 226, 227, 228, 229, 230, 231, 232, 234, 236, 237, 238, 239, 240, 247, 249, 250, 251	462.164,59	6 months and 24 days	10.11.2020	314,582.14 TL	No



### 3 PROJECT STANDARDS

#### 3.1 Applicable National Standards

- The Expropriation Law (no: 2942, amended by Law no: 6645 in 2015) states that in all cases where the owners of immovable properties are identified, the primary preference is to purchase the land through negotiation. For owners with whom agreement cannot be reached by negotiation or for owners with unidentified addresses, absent owners, or for immovable properties over which there are ownership disputes; a lawsuit is filed with the relevant court of first instance for valuation and registration. Article 46 of the Expropriation Law No. 2942 stipulates that the miner may request establishment of easement and/or usufruct rights over the property subject to private proprietorship of the exploration field during the mineral exploration period by applying to the Ministry, provided that it is exclusive to the purpose of utilization and for certain periods of time. The allowance in return of easement and/or usufruct rights is determined by the experts to be appointed. At the end of the exploration period, the duration of the established easement and/or usufruct rights can be extended not to exceed the duration of the operation upon the request of the operation or a new application made for easement and/or usufruct rights. In the event the property is damaged during the activities, license holder is obliged to pay the indemnification determined by the judicial authorities to the owner of the land and to leave the field in utilizable condition. The property subject to private proprietorship that is required for the activities of the operation at the stage of operation license is expropriated in the event parties cannot reach an agreement and upon the request of operation license holder and Ministry's decision on public interest. Expropriation transactions are executed in accordance with the provisions of Expropriation Law No. 2942. The operation license holder pays related expenses and an expropriation fee. Expropriated property is registered at the land registry in the name of the Treasury (the Government) and is allocated to the license holder to be used in mining activities during the validity of the license. In the event it is determined that the expropriated real estate is no longer required for the mine operation activities, it is notified to the license holder and the former proprietor of the property that the expropriated property shall be returned to the former proprietor with the condition of payment of the market value to be determined in accordance with the principles and procedures prescribed in the Expropriation Law. In the event the former proprietor does not apply to take over the property within six months, the property remains at the Treasury.





- According to Article 8 of Expropriation Law (no: 2942), in all cases where the owners of immovable properties are identified, the first-choice practice is to purchase the land through negotiation. For those owners with whom agreement cannot be reached by negotiation or for owners with unidentified addresses, absentee owners, or for immovable properties over which there are ownership disputes; a lawsuit is filed with the relevant court of first instance for valuation and registration, pursuant to Article 10 of the Expropriation Law, and the expropriation compensation set by the court in the course of the lawsuit is deposited into a bank account to be paid to the owner of the expropriated property. The expropriation compensation for immovable properties with unidentified owner is deposited into a time account with 3-month maturity terms. (A minimum two months is required for notification and negotiations before invoking of the Article 10 of the Expropriation Law. The actual time increases in proportion with the number of owners and land parcels.)
- Expropriation compensations are set pursuant to the criteria set out in Article 11 of the Expropriation Law. Turkish legislation does not require the payment of compensation to tenants, sharecroppers and illegal users of properties who have made no improvements (building and/or tree). However, persons who have spent money and constructed/erected buildings or other structures on the lands of other persons are compensated at replacement cost for trees and material costs for buildings.
- The owner of the asset can apply to the administrative court for the cancellation of expropriation or to the judicial justice for corrections against mistakes of fact within 30 days after the notification date (Expropriation Law, Article 14). If the owner is not satisfied with the amount of expropriation compensation determined by the court according to the article 10 of the law, can appeal at Supreme Court.
- Announcement: The government notifies the owners of the immovable property to be expropriated through an official registered letter indicating its desire to purchase the subject land through negotiation, and paying the price of the land or easement right for such land in cash. For immovable properties over which there is ownership dispute, and unidentified owners, relevant court publicizes the summary of expropriation documents in a local and national newspaper at least once.
- Purchasing Upon Agreement / Payment of Compensation / Alienation: Negotiation commission is internally established by the agency responsible for land acquisition to negotiate with property owners. Each negotiation commission is comprised of at least three persons. Prior to negotiation stage, the aforesaid agency sends an official



invitation letter to property owner without informing about the estimated value for the asset that had been previously estimated by the valuation commission. Then, negotiation session starts on determined date (Article 8 of Expropriation Law). Agreement: If an agreement on expropriation value is reached, at first a written agreement (memorandum of agreement) is signed by both sides, then the property ownership transfer (alienation) and payment of expropriation compensation procedures are completed within 45 days. The property owner does not hold a right of objection after this negotiated settlement process.

- Non-agreement: If an agreement is not reached during negotiations, a memorandum of non-agreement is signed by two sides and the agency/sponsor responsible for land acquisition applies to the Civil Court of First Instance with needed documents. The court assigns a day for a trial within 30 days following this application and calls the parties (agency and property owner) for conciliation on a value on the trial day. If the parties cannot reach an agreement upon a value at this first hearing, the judge assigns a date for land survey by a commission, which consists of independent experts, within 15 days, and a new trial date within 30 days. The evaluation process of the immovable property is undertaken by this independent expert commission with the participation of all parties and the village headman. Following the field visit regarding land survey, the expert commission submits its report to the court within 15 days. The report explicitly states the determined value for the property. Then, the court sends this report to both parties. If the parties cannot reach an agreement on this value at the trial again, the judge can assign a new expert commission to finalize the same procedure within 15 days and determines the expropriation value at the next trial day. The Court takes the final decision about the compensation of immovable property in question and alienation/registration of the land in the name of government. Then, both sides still have the right to appeal to the “Supreme Court” about the valuation. Finally, the property ownership transfer (alienation) and payment of expropriation compensation are completed within 15 days in line with the decision of the court.
- It should be noted that the costs of the court process are born by the responsible agency according to the Expropriation Law. Particularly, in case of the court process cannot be concluded within 4 months, legal interest rate is applied to determined compensation amount as from this deadline. This should also be noted that the expropriation files of deceased owners, absentee owners, persons claiming customary right are directly conveyed to local civil court of first instance by the agency responsible for land acquisition.



- According to the Article 10 of Expropriation Law, the court of first instance shall summon the property owner by notifying the date of hearing, by attaching the action lawsuit petition of responsible organization and one copy from each document submitted by responsible organization, either through annotated invitation or to those owners whose addresses not reached at the end of investigation carried out by responsible organization through announcement (newspaper advertisement) as per the Law on Notifications. This means that absentee owners are informed through the several ways.
- In case of owner cannot be determined, Article 10 of the Law reads that the needed measures shall be taken by the court for the aim of providing interest for the amount of expropriation compensation through depositing the amount into a time deposit account with a term of 3 months. In addition, if a land is partially expropriated and in case of the remaining part is not usable, this part shall also be expropriated upon the request of the owner within 30 days following receiving expropriation decision (article 12 of Expropriation Law).
- Urgent Expropriation: Article 27 of the Expropriation Law authorizes the organization responsible for expropriation to confiscate the properties required by the project earlier than the time needed in normal expropriation procedure. This process does not prevent challenges of the property owners against the determined valuation.
- Mainly, for the expropriation of needed immovable properties Article 27 of the Law prescribes that in cases of the necessity for national defense as for the implementation of the Law on Obligations for Natural Defense (No: 3634) or in cases of the urgency of land expropriation decided by the Cabinet or in cases of emergency, which are stipulated in special laws, any immovable asset can be confiscated by the organization responsible for expropriation. In this case, the sequence of operations (excluding evaluation of immovable properties) is completed later. Through the court (upon request of the responsible organization), the values of the immovable assets are evaluated by an expert commission according to the provisions of Article 10 and 15 of the Law within seven days. The confiscation can be carried out after the determined compensation is deposited in the bank (in the name of the owner) indicated in the invitation letter and an announcement in line with the Article 10 of the Expropriation Law, by the responsible organization.
- According to the decision of 5th Civil/Legal Department of Supreme Court/High Court of Appeal in 2008 (No: E 2008/1494, K 2008/3602) the amount of compensation



determined according to the article 27 of Expropriation Law is not the final amount of compensation. If a landowner disagrees with the organization responsible for land acquisition on the compensation amount, he can refuse to alienate his land. In this case, the Responsible organization has to take the matter to the court according to article 10 of the Expropriation Law. Under those circumstances the responsible organization has to invite all owners regardless they agreed and disagreed with the initial compensation to finalize the expropriation process.

- Article 46 of the Turkish Constitution explains that state and legal public entities, in cases of public benefit, are entitled to entirely or partially expropriate immovable properties in private possession, on Condition that the real value of those immovable properties are paid in advance and in cash; and to establish easement rights on these immovable properties in compliance with the procedures and principles set by expropriation law. In other words, Turkish Constitution implies that any immovable property cannot be confiscated unless its expropriation compensation is paid to the owner/s in advance and in cash.
- Expropriation fees are set pursuant to the criteria set out in Article 11 of the Expropriation Law. Turkish legislation does not require the payment of compensation to tenants and unofficial users of properties who have made no improvements. However, persons who have spent money and constructed/erected buildings or other structures on the lands of other persons are compensated at full replacement cost. They are also compensated for standing crops and economic trees they planted on the land they use unofficially.

### 3.2 Applicable International Standards and Guidelines

The objectives of IFC Performance Standard 5 are:

- To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs.
- To avoid forced eviction.
- To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- To improve, or restore, the livelihoods and standards of living of displaced persons.



- To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.
- To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, the use of negotiated settlements is encouraged.
- Preparation of a Livelihood Restoration Framework (LRF) is required where transactions involve economic (but not physical) displacement of people, and the Project is required to develop procedures to offer affected persons and communities' compensation and assistance.
- Where the exact nature or magnitude of the land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unknown [...] the client will develop a [...] Framework outlining general principles comparable with this Performance Standard. Once the individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific Resettlement Action Plan (RAP).
- RAPs are expected to: identify all people to be displaced; demonstrate that displacement is unavoidable; describe efforts to minimize resettlement; describe the regulatory framework; describe the process of informed consultation and participation with affected people; describe the entitlements for all categories of displaced people and assess risks to vulnerable groups of the various entitlements; describe the methodology for valuation of lost assets and demonstrate that it is adequate, i.e., at least equal to the replacement cost of lost assets; provide details on replacement housing; outline plans for livelihood restoration if applicable; describe relocation assistance to be provided; outline the institutional responsibility for the implementation of the RAP and procedures for grievance redress; provide details of the arrangements for monitoring and evaluation; develop a budget for implementation.
- IFC PS 5 specifically requires that “when consultation and engagement is the responsibility of the host government, projects have a responsibility to collaborate with relevant agencies and conduct a complementary process when the government-led process does not meet the relevant requirements of the performance standard”.

### 3.3 Key Differences between National Legislation and IFC PSs

A comparison between Turkish legal requirements and IFC Performance Standards requirements for land acquisition, resettlement and displacement highlights the following key differences:



- The IFC Performance Standards includes requirements for livelihood restoration to restore incomes and standards of living of displaced persons to pre-project levels (both for persons with formal and informal land title). Whilst Turkish law requires compensation for lost profit / income of affected formal economic activities resulting from displacement, this only applies to people with formal land rights, rather than for those with informal land rights. Neither does Turkish law require assistance for resettlement or alternative livelihood assistance.
- The IFC Performance Standards set greater requirements than Turkish law for giving affected persons the opportunity to participate in the negotiation of the compensation packages, eligibility requirements, livelihood restoration and resettlement assistance. Affected people are to be provided with timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.
- Turkish law focuses on compensation for formal land rights, whereas the IFC Performance Standards also cover compensation, livelihood restoration and consultation for persons with no formal recognisable legal right to land.
- Conducting socio-economic surveys to assess impacts on livelihoods is required by the IFC Performance Standards, but not required by Turkish law.
- Turkish law does not stipulate special measures relating to vulnerable groups. The IFC Performance Standards, however, require particular attention to be paid to vulnerable groups, including during consultation, identification of entitlements and appropriate resettlement assistance. Turkish law does not require the preparation of resettlement action plans or livelihood restoration frameworks. However, these are required by the IFC Performance Standards involving land acquisition and resettlement resulting in physical and/or economic displacement.
- The IFC Performance Standards state that compensation for loss of assets is calculated at full replacement cost, i.e. market value of the assets plus transaction costs, and that depreciation of structures and assets should not be considered. However, Turkish law states that compensation is established according to the market value of the material and the labour necessary for construction of facilities, decreased by the relevant amortization amount.
- Although Turkish law establishes rights of affected citizens (those with formal land rights) to appeal to courts during the expropriation procedure, it does not require development of specific grievance mechanisms. The IFC Performance Standards,



however, requires grievance mechanisms to be set up as early as possible in the process, to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons, including a recourse mechanism designed to resolve disputes in an impartial manner.

### 3.4 Project Standards

The Project will meet the requirements outlined in section 3.1 and 3.2. In case national and international requirements differ, the Project will adhere to the most stringent requirement.

## 4 IMPACTS IN RELATION TO LAND ACQUISITION

The following section provides an overview only of impacts that require mitigation, during construction and operation. Impacts from decommissioning will be similar to those during the construction phase.

### 4.1 Impacts during Construction Phase

During construction, involuntary resettlement, possibly leading to economic displacement may occur during construction for the following categories of people:

- Persons who are using the land plots which have been or will be acquired for the project, who are may or may not be the owner, and whose crops may be affected by construction.
- Persons who are using the land plots which will be crossed during the transport and installation of wind turbines or other land which may be disrupted during construction, whose crops may be affected.

According to the interviews conducted by MGS, renting of land is not done among locals and therefore the existence of users of land, who are not owners, is not possible. The existence of individuals using the land without the knowledge of the owners is even less possible as all land is intensely farmed. Nevertheless, measures to compensate and assist such persons in case they are encountered at later project stages, are included in the LAP.

Transport and increased traffic are not expected to have impacts on livelihoods on the access road, O-5, which is one of the main roads in Turkey. Any businesses along this route are not expected to suffer income losses, as a result of project related increased traffic. However, use of on-site roads do have impact on the crops grown on the sides of the roads as per the observations from the site visit conducted by MGS. Sunflowers are grown on these lands and as per the verbal information gathered from Sanko Enerji representatives, in case of damage to crops, Sanko Enerji is willing to compensate the damage of farmers.



## 4.2 Impacts during Operation Phase

During operations, a part of the land on which turbines are installed will be subject to some use restrictions.

Similar to the construction phase, involuntary resettlement, possibly leading to economic displacement may occur for persons who are using the land plots which may be crossed during maintenance of turbines, whose crops may be affected.

## 5 ELIGIBILITY

All individuals / households owning, occupying or using project affected land, who are affected by physical and/or economic displacement, are entitled to compensation and/or livelihood restoration or other assistance. The type of compensation and assistance applicable will be outlined in an Entitlements Matrix.

Based on available information to date, the following potential categories of Project Affected Persons (PAPs) have been identified:

- Owners of land (formal with legal rights or claims over the land)
- Formal users of land (e.g. tenants with formal legal right over the land they occupy/use).
- Informal / unlicensed users of land such as beekeepers
- Owners of crops and trees
- Owners of non-residential structures/assets and infrastructure.
- Owners of business structures/assets. Local community and individuals/households affected by loss of access and/or disruption of access.

Once more information about land ownership, use and occupation becomes available, the categories of PAPs will be updated.

## 6 ENTITLEMENT MATRIX

An Entitlement Matrix will be prepared which describes the entitlement policies for each category of impact. In accordance with IFC PS5 requirements, all categories of impacted landowners and users (formal and informal, private owners, tenants, customary land users, etc) will be included in the entitlement matrix and eligible for appropriate compensation and/or livelihood restoration support.





An indicative Entitlements Matrix is shown in Table 5 below. This will be refined in the light of the forthcoming surveys and consultation discussions.

Table 5 Entitlement Matrix

Property	Category of Project Affected Persons	Type of loss	Entitlement
Land	Owner	Loss of land	Cash compensation to owner of the land for affected land at replacement cost (at least equal to replacement costs of assets, not including depreciation). As well as compensation for expropriated land, the owner of the expropriated land will also be entitled to:
	Tenant	Loss of land	<ul style="list-style-type: none"> <li>• Compensation for the crops, seeds, fruits, forests on the land, in case these were not incorporated in the market value of the land;</li> <li>• Compensation for assets or facilities (e.g. wells, irrigation systems, fencing, etc.), in case these were not included in the market value of the land;</li> <li>• Compensation for interruption to economic activities associated with land acquisition;</li> <li>• Reimbursement of moving expenses.</li> <li>• The owner of expropriated land is not entitled to compensation for investments made following the date of submission of the proposal for expropriation.</li> </ul> Cash compensation to tenant farmers (if any) for financial cost of acquiring equivalent alternative land tenancy, valued at market values.
Crops	Owner	Loss of income and/or livelihood	Cash compensation for annual crops at replacement value.
	Tenant	Loss of income and/or livelihood	
Residences / houses	Owner	Loss of property Loss of shelter	Replacement or cash compensation for loss of house at replacement costs for owners.
	Tenant	Loss of shelter	Cash compensation to tenants for financial cost of acquiring equivalent alternative tenancy, valued at market values.



## 7 MITIGATION MEASURES

During construction, Sanko Enerji will undertake the following activities:

- Provide timely information about the timetable of the construction activities
- Provide timely information to people/households/businesses located along selected transport route about the Traffic Management Plan, discuss impacts and agree on mitigation measures.
- If compensation alone is not sufficient to restore livelihoods, implement livelihood restoration measures
- Minimise the amount of land occupied during construction and the damages to surrounding fields / crops
- Compensate all lost crops and damages in accordance with the IFC PS5 and the principles described in the LAP.
- Upon the completion of construction activities, fully reinstate the land not permanently occupied

During operations, Sanko Enerji will limit land use restrictions only to areas needed for the safe operation of wind turbines and easy access for repairs and maintenance, to optimise land use. All damages and crops will be fully compensated.

During decommissioning, Sanko Enerji will remove all materials and equipment from sites and fully reinstate the land. In this phase, Sanko Enerji will transfer property rights over Republic of Turkey.

### 7.1 Categories of Affected People

Owners are defined as individuals who have formal legal ownership of land, registered in the Cadastre and/or Land Books. There may be cases where individuals are in fact owners however, they do not have appropriate ownership documentation available to be able to prove their ownership status and consequently sign compensation contracts. This may be because of issues such as unprocessed inheritance procedures or unregistered sale / purchase agreements, etc. If such cases are encountered during the land acquisition and compensation process, Sanko Enerji will assist property owners in confirming their ownership status and securing the appropriate documentation (e.g. from the Cadastre / Land Books), whenever necessary, to facilitate contract signing and payment of compensation.

Users of land can be divided into formal and informal users. Formal users may have legal contracts allowing them to use private or public land (e.g. land lease). Informal users may be



using land without the owner's permission (e.g. if the owner is abroad and is not using the land) or using public land. Both categories of users are entitled to compensation at full replacement value for all crops, trees, plants that they have planted, as well as any improvements they have made to the land (e.g. fences, irrigation channels). In addition, if the acquisition of land results in the economic displacement of users, they will be entitled to appropriate livelihood restoration assistance.

Owners of both formal and informal businesses are entitled to compensation for any losses they incur (lost net income), either permanently or temporarily. This can take the form of cash compensation and/or the implementation of livelihood restoration measures.

Some individuals or groups may be considered more vulnerable than the majority of the population and, if affected by Sanko Enerji's operations, might require special assistance. Such groups could include:

- Elderly single headed households
- Single parent households especially if women
- Child head of the family
- Beneficiaries of social welfare
- Illiterate persons
- Informal users of land who have no sources of income or assets of their own, etc.

Sanko Enerji will assist such individuals / households in accordance with their specific needs. For example, certain groups may need legal or other assistance to be able to receive compensation, some vulnerable households may need additional services from social workers in which case Sanko Enerji will coordinate with local Centres for Social Welfare or other service providers, etc.

## **7.2 Valuation of Affected Assets and Replacement Costs**

Replacement value is calculated as the market value of assets plus any transaction costs associated with restoring such assets (e.g. transfer taxes, registration costs). Replacement value of land corresponds to the market value of land with similar characteristics in the vicinity of the affected land and any transaction costs.

Assets are evaluated by independent court certified land surveyors and valuers. The valuation of land takes into account the quality and productivity of land. Valuation of plants and trees takes into account various important features, such as their age or the resources and amount of time that would be needed to grow a new tree/plant. Even after receiving



compensation, project affected people are allowed to salvage plants / trees, i.e. remove them with roots and attempt to replant them in other locations.

### **7.3 Livelihood Restoration Measures**

In case the implementation of the Project causes economic displacement of project affected people, defined as loss of assets or access to assets that leads to loss of income sources or means of livelihood, alongside compensation for affected assets, Sanko Enerji will implement livelihood restoration measures. Such measures may include:

- Compensation for the cost of re-establishing business activities elsewhere
- Provision of any transitional support
- Compensation for or assistance with transport of equipment or machinery
- Training, skill development, access to job opportunities, etc.

All land temporarily acquired (if any) for the Project will have to be fully reinstated before being returned to the user of land. This means that all sites will be cleared of waste and that all equipment will be removed. It may also include topsoil conservation to preserve the quality of the affected land. Undertaking these measures will enable owners / users of land to continue using it in the same way they used it before the implementation of the Project and prevent economic displacement.

## **8 GRIEVANCE MECHANISM**

Sanko Enerji has developed a grievance mechanism to receive and consider all comments and complaints associated with the Project, including those related to land acquisition. The grievance mechanism is described in more detail in the Stakeholder Engagement Plan (GNY1-PLN-SOC-001).

Any person or organisation may send comments and/or complaints in person, by phone or via post or email using the following contact information:

## **9 MONITORING AND REPORTING**

### **9.1 Overview of Monitoring Requirements**

Social Responsibility Staff (SRS) of the Project will regularly monitor land acquisition and the implementation of LAP against the KPIs. land acquisition database on the individuals / households whose properties have been affected by the Project, compensation and livelihood restoration measures that have been implemented will be developed and regularly updated.

All information on individuals / families, their properties and their compensation payments will be kept confidential.

## 9.2 Key Performance Indicators (KPIs)

Key performance indicators and related key monitoring actions are summarised in Table 6. These key monitoring actions will be used to assess the progress and effectiveness of proposed mitigation measures regarding land acquisition of the Project.

Table 6 Key Performance Indicators

ID	KPI	Target
1	Number of grievances related to land acquisition and compensation resolved	All complaints resolved within one month after it is recorded (with the exception of any court process)
2	Spending on compensation and assistance	Spending on compensation and assistance as per Entitlement Matrix and compensation values
3	Number of individual compensation agreements signed	All compensation agreements signed before start of Project construction
4	Number of people who have received compensation in the period – shown by compensation type and amounts	All compensation paid before start of Project construction
5	Resettlement assistance provided	All resettlement assistance provided as per Entitlement Matrix
6	Livelihood restoration assistance provided	All livelihood restoration assistance provided as per Entitlement Matrix

## 9.3 Reporting

Using the monitoring framework described above, SRS will produce reports on the progress achieved with the implementation of the LAP. These reports will consolidate the information on compensation and livelihood restoration measures, consultations measures, information on negotiations and results, provision of assistance to vulnerable groups, grievance management, etc.

All the reports, grievances and responses to the grievances will be kept in DCC of the Project.