GEM Sustainability Services and Consultancy Inc.

Kınalı-Malkara Motorway Project

Resettlement Action Plan (RAP)

Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.

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Abbreviations

Abbreviation	Definition
BAP	Biodiversity Action Plan
BOT	Built-Operate-Transfer
BOTAŞ	Petroleum Pipelines Corporation (Boru Hatları ile Petrol Taşıma A.Ş.)
CIMER	The Presidency's Communication Centre of Türkiye
CLAP	Community-level Assistance Programme
CLO	Community Liaison Officer
CDP	Community Development Plan
CNC	Computer Numerical Control
CPI	Consumer Price Index
ÇKS	Farmers Registration System
ÇOK A.Ş.	Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.
ÇORDAŞ	Çorlu Natural Gas Distribution Company (ÇORDAŞ)
DOP	Development Readjustment Share
DSI	State Hydraulic Works
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
EP	Equator Principles
EPC	Engineering, Procurement and Construction
EPFI	Equator Principles Financial Institutions
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ETL	Electricity Transmission Line
EUR	Euro
FX	Foreign Exchange
GAZDAŞ	Trakya Natural Gas Distribution Company

Abbreviation	Definition
GBVH	Gender-Based Violence and Harassment
GEM	GEM Sustainability Services and Consultancy Inc.
GIS	Geographical Information System
GLAC	Guide to Land Acquisition and Compensation
GM	Grievance Mechanism
GN	Guidance Not
GPS	Global Positioning System
HH	Household
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety, Environment
IFC	International Finance Corporation
IFIs	International Financial Institutions
İGDAŞ	İstanbul Gas and Natural Gas Distribution Company
İLBANK	İller Bankası A.Ş. (Bank of Municipalities)
İSKİ	Istanbul Water and Sewerage Administration
KGM	Directorate General of Highways
KM	Kınalı – Malkara
KMZ	Keyhole Markup Zipped
KÖSOB	Public – Private Partnership Regional Directorate
KPIs	Key Performance Indicators
LESA	Lender's Environmental and Social Advisor
Limak	Limak İnşaat Sanayi ve Ticaret A.Ş
LRP	Livelihood Restoration Plan
MC	Malkara – Çanakkale
MERNIS	Central Civil Registration System
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTI	The Ministry of Transport and Infrastructure
MoU	Memorandum of Understanding
MSF	Motorway Service Facilities
NATO	North Atlantic Treaty Organization
NGO	Non-governmental Organisation

Abbreviation	Definition
NTS	Non-Technical Summary
NVI	Population and Citizenship Affairs System
O&M	Operation & Maintenance
OECD	Organisation for Economic Co-operation and Development
OHTL	Overhead Transmission Lines
PAP	Project Affected Person
PPP	Public Private Partnership
PS	Performance Standard
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SEVMP	Severance Management Plan
SGK	Social Security Institution
SPV	Special Purpose Vehicle
SÜRKAL	Sürdürülebilir Kırsal ve Kentsel Kalkınma Derneği
TAKBİS	Land Registry and Cadastre Information System of Türkiye
TBA	To be assigned
TBD	To be determined
TCDD	Turkish State Railways (Türkiye Cumhuriyeti Devlet Demiryolları)
TEDAŞ	Turkish Distribution Transmission Corporation
TEİAŞ	Turkish Electricity Transmission Corporation
TESKİ	Tekirdağ Water and Sewerage Administration
TH	Non-registered
TKGM	General Directorate of Land Registry and Cadastre
TREDAŞ	Trakya Gas Distribution Company
TRY	Turkish Lira
TURKSTAT	Turkish Statistical Institute
TÜFE	Tüketici Fiyat Endeksi (Turkish Consumer Price Index)
UEDAŞ	Uludağ Gas Distribution Company
UYAP	National Judiciary Informatics System
WPP	Wind Power Plant
YİMER	Foreigners Communication Centre

Executive Summary

The Kınalı – Malkara Motorway (KM Section or **the Project)** is a sub-set of the broader **Kınalı–Tekirdağ–Çanakkale–Savaştepe Motorway**. The Malkara – Çanakkale Section (including 1915 Çanakkale Bridge) of the Kınalı-Savaştepe Motorway (the "**MC Section**"), was tendered by the Directorate General of Highways ("KGM") in January 2017 and the consortium comprising of DL E&C Co. Ltd., Limak İnşaat Sanayi ve Ticaret A.Ş., SK Ecoplant Co., Ltd. and Yapı Merkezi İnşaat ve Sanayi A.Ş. was awarded the tender. Upon award of the tender, the consortium established the Project Company – **Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.**[1] **(ÇOK A.Ş) –** and an Implementation Contract was signed between the Project Company and the KGM on **21 March 2017** (the "**Implementation Contract**"). The Malkara – Çanakkale Section was officially inaugurated on **18 March 2022.**

The **Kınalı – Malkara** Motorway is located in **İstanbul** and **Tekirdağ** provinces and traverses the boundaries of **5 districts** (Silivri in İstanbul and Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara in Tekirdağ) and **39**[2] **neighbourhoods**. It has a **total length of approximately 127 km**, encompassing both the **main Motorway (105.2 km)** and **connection roads (21.8 km)**. It is planned as a dual carriageway with **2x3 lanes** for the **main Motorway,** and **2x2 lanes** for the **connection roads. The Project consists** of three sections:

- **Section 1:** KM 0 – 35
- **Section 2:** KM 35 – 70
- **Section 3:** KM 70 – 105

The land acquisition required for the Project results in risks and impacts related to both physical[3] and economic[4] displacement. Accordingly, this **Resettlement Action Plan (RAP)** has been prepared by GEM Sustainability Services and Consultancy Inc. (GEM), the **RAP Consultant** appointed for the Project by the **Limak İnşaat Sanayi ve Ticaret A.Ş** on 20 October 2025**,** in line with applicable international standards, with the objective of developing and implementing measures to mitigate these risks and impacts on individuals owning and/or or using the affected lands, houses, and other structures.

The RAP has been developed based on a comprehensive review of expropriation data compiled by the engineering firm (valuation contractor) appointed by the SPV, with the approval of KGM, in accordance with the Expropriation Law and KGM Technical Specifications, and the outcomes of the RAP fields surveys conducted in **January, February and March 2026**.

As of the date of this document, expropriation data, including the approved expropriation plans, lists and valuation data, are **available for Section 1** (KM 0 – 35), **Section 2** (KM 58 – 60) **and Section 3** (KM 70 – 105). The cadastral approval process for the **for the remainder of Section 2** (KM 35 – 70, excluding KM 58 – 60) was recently completed in May 2026.

Accordingly, this **RAP has been prepared for the full Motorway alignment,** incorporating approved expropriation data for Section 1 (KM 0 – 35), Section 2 (KM 35 – 70) and Section 3 (KM 70 – 105) and valuation data for Section 1, Section (KM 58 – 60) and Section 3..

Once the approved expropriation plans and valuation data (including structure valuation forms) for the remainder of Section 2 become available, the **RAP will be updated** accordingly to incorporate approved expropriation and valuation data, relevant assessments and budget calculation for Section 2.

[1] **Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş)** is a joint venture of Limak İnşaat Sanayi ve Ticaret A.Ş. (Limak, an affiliated company of Limak Holding) and Yapı Merkezi of Türkiye and Daelim and SK of South Korea.

[2] The accelerated expropriation decision for the Project initially covered 38 neighbourhoods; however, Mahramlı Neighbourhood of Tekirdağ, Malkara indicated in the decision is not affected by the Project's land acquisition according to the current expropriation plans. According to the current expropriation lists, two additional neighbourhoods from Marmaraereğlisi – Sultanköy and Cedit Ali Paşa – have been added, bringing the total number of affected neighbourhoods to 39.

[3] According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), **physical displacement** is defined as the loss of dwelling or shelter as a result of project-related land access, which requires the affected person(s) to move to another location.

[4] According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), economic displacement is defined as the loss of assets (including land) or access to assets that leads to loss of income sources or means of livelihood as a result of project related land acquisition or restriction of access to land and natural resources.

ÇOK A.Ş. serves as the Special Purpose Vehicle (SPV) for the Project – **with Limak being the sole sponsor for Kınalı – Malkara Section.** Throughout this Report, ÇOK A.Ş.is also referred to as the Project Company, Appointed Company, or the Company.

The RAP was prepared by GEM Sustainability Services and Consultancy Inc. (GEM), the **RAP Consultant** appointed for the Project by the **Limak İnşaat Sanayi ve Ticaret A.Ş** on 20 October 2025**.**

Prior to the RAP, a **Resettlement Policy Framework (RPF)** was prepared by GEM and finalised following the review and approval of the Project's Lenders and the Lenders' Environmental and Social Advisor (LESA) on 16 December 2025.

The SPV has approached international financial institutions (IFIs) and commercial banks (referred to collectively as potential "lenders"), to finance the Project. Accordingly, the RPF and the RAP have been developed in accordance with the following standards of the lender groups (the "applicable international standards"):

- International Finance Corporation (IFC) Performance Standards (PSs) (2012),
- Equator Principles (EP) 4 (2020), and
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the "Common Approaches" adopted in 2012 and revised by the OECD Council in 2016 and 2024).

Separate from the RAP process, a consultancy firm completed an **Environmental and Social Impact Assessment (ESIA)** process for the Project in accordance with the applicable international standards.

The Project under the Build-Operate-Transfer (BOT) Model

The **Kınalı – Malkara Motorway** is intended to be included within scope of the Project Company's appointment under the Implementation Contract as an **additional work** to the Malkara – Çanakkale (MC) Section. The Project Company and the KGM signed a **memorandum of understanding** ("**MoU**") in September 2022, governing the terms and conditions of undertaking the KM Section as an additional work. The MoU includes an annex setting out the amendments to be made to the Implementation Contract in respect of the KM Section.

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as **36 months** following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date.

The **Finance Agreement** for the Project was signed between the SPV and the Lenders on **30 April 2026.** Consequently, construction works commenced in **Q2 2026** following the financial close under the Finance Agreement[5].

The Project is a public-private partnership (**PPP**), with the granting authority being the **Republic of Türkiye Ministry of Transportation and Infrastructure** (**MoTI**), represented by the **Directorate General of Highways** (**KGM**). ÇOK A.Ş. acts as the **private partner** under the BOT Contract.

Within the context of the BOT model, the granting authority, KGM, is responsible for executing the expropriation works required for the Project in accordance with the Expropriation Law (No. 2942, 1983) of Türkiye and based on the **Public Benefit Decision** declared by the MoTI on **6 July 2022**. The SPV, as the private partner, is responsible for the design, construction, financing, operation and maintenance of the Project until its transfer to KGM.

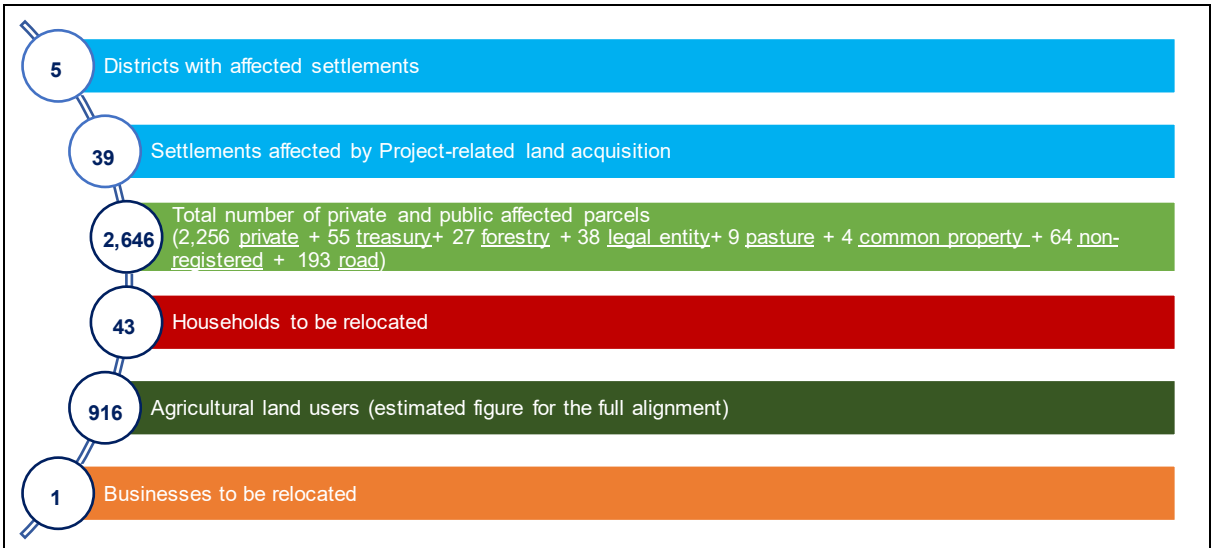
[5] The financial close represents the first utilisation under the finance arrangement.

Overview of Potential Displacement Impacts

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

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

The key figures related to displacement impacts of the Project within the Motorway's expropriation corridor (covering Section 1, Section 2 and Section 3) as per the current expropriation data are summarised **below**. Measures taken by KGM and the SPV for avoidance and minimisation of Project-related displacement impacts are detailed in this RAP.



Ownership	Total Expropriation Area (m^2)			Number of Parcels			
	Section 1 KM 0-35	Section 2 KM 35-70	Section 3 KM 70-105	Section 1 KM 0-35	Section 2 KM 35-70	Section 3 KM 70-105	**Total**
Privately-owned							
Private	4,970,684.31	5,976,334.52	3,113,007.39	1,068(*)	745	438	2,251
Private – pasture	0.00	44,519.64	0.00	0	2	0	2
Litigious	-	12,136.12	-	-	3	-	3
State (Public)							
Treasury	28,820.15	9,324.85	953,876.82	27	8	46	81
Common Property - Pasture	85,123.94	590.69	184,231.43	2	1	6	9
Common Property – Agricultural Land, Meadow and Others[6]	718.12	15,742.70	85,359.35	1	1	2	4
Non-registered	64,484.35	137,208.56	64,256.72	15	32	18	65
Road[7]	116,415.41	133,773.44	78,627.43	85	66	42	193
Legal Entity							
Legal Entity- Agriculture, Meadow and Others[8]	4,965.44	51,984.59	51,724.52	6	20	10	36
Legal entity - Pasture	9,864.43	0.00	0.00	2	0	0	2
Total – Section-based	**5,281,069.15**	**6,381,615.11**	**4,531,083.66**	**1,206**	**878**	**562**	**2,646**
Grand Total	**16,193,767.92 m^2**			**2,646 parcels**			

*Note: The figures for **Section 2** (excluding KM 58 – 60, for which approved expropriation data is available) are based on current version of the expropriation plans and may change. Final confirmation for Section 2 is awaited from KGM.*

(*) One of these parcels is jointly owned by private owner(s) and the state.

[6] The parcels classified as "Other" are livestock watering locations ("*sıvat yeri*").

[7] These are cadastral roads crossed by the Motorway's right of way. Permit procedures will be deployed and permits will be obtained for the Project.

[8] The parcels classified as "Other" include railway, transformer and pole locations.

Construction Overview

On **18 March 2025**, a **groundbreaking ceremony**[9] was held for the Kınalı – Malkara Motorway Project on parcels that were expropriated for the1915 Çanakkale Motorway and Connection Roads Project. Pre-mobilisation works (e.g soil stripping)[10] have started at the İnecik Satellite Camp Site planned at KM 83+500 in **February 2026**.

In line with the construction schedule agreed with KGM, site mobilisation for Project construction has commenced in **Q2 2026** and will progress lot by lot, on parcels where the land acquisition process has been completed – whether through purchase or expropriation for privately owned parcels, or through allocation of state-owned parcels to the Project.

The Engineering, Procurement, and Construction (EPC) Contractor appointed by the SPV for the Project is **Limak İnşaat Sanayi ve Ticaret A.Ş**. The EPC Contract was signed in April 2026.

Land Acquisition Overview

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

- The **Public Benefit Decision** (No: 2022/138) for the Project was declared by the **MoTI** on **6 July 2022**.
- A **Presidential Decree**[11] **(No. 7060, Date: 12 April 2023)** 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. 32162) on **13 April 2023** (referred to as **Accelerated Expropriation Decision**).

The census, inventory of assets[12] and valuation (field identification) works for parcels affected by the Project's current alignment have been conducted in accordance with the technical specifications of the KGM. These activities have been carried out since April 2024 by a certified national engineering firm ("**valuation contractor**"), appointed by the SPV and approved by KGM.

Based on the Accelerated Expropriation Decision, KGM has the authority to initiate accelerate expropriation court proceedings (**Article 27**) in line with the construction schedule and subject to the availability of the expropriation budget for compensating right holders. However, **in this Project, KGM has prioritised negotiated settlements through the Article 8 process (purchasing method**) under the Expropriation Law, and Article 10 procedures in cases where agreement cannot be reached. Accordingly, KGM has started inviting all owners and shareholders, including heirs[13], to participate in Article 8 negotiations.

Accordingly, **the expropriation process** for the Project **was initiated by KGM in 2024** through the issuance of initial Article 8 invitations and the conduct of negotiation meetings with participating owners and shareholders. It progresses lot by lot in each section, in line with the availability of the expropriation budget and the construction programme.

A summary of the expropriation status is as follows (as of mid July 2026):

- **In Section 3** (KM 70 – 105), Article 8 negotiation meetings were completed with the owners and shareholders, including the rightful heirs, of all privately owned parcels, in 2025. Out of **448** private and legal entity parcels subject to expropriation in this Section, **37** parcels have been purchased by KGM through Article 8 (negotiated settlement) and Article 10 payments were deposited by KGM for **406** parcels. For 5 of the parcels, Article 10 procedures are still ongoing (pending court-appointed expert reports to be completed). Accordingly, the expropriation procedures including **Article 10** (with title deed transfer either completed or in the process of completion) **have been completed by KGM for almost 99% (443 parcels;**

[9] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/OtoyolProjeleri/KinaliMalkara.aspx

[10] These works were carried out on privately owned parcels for which expropriation, including compensation payments, has been completed. Prior to land entry, there were no crops or structures on these parcels. As the landowners were aware of the expropriation process, they did not undertake any cultivation after the completion of expropriation.

[11] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

[12] According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "*assets can include (but are not limited to) rights to land, land improvements, dwellings and associated structures, other immovable property, trees and crops, community assets and access to natural resources, and cultural and spiritual property*".

[13] As a standard practice, KÖSOB identifies deceased persons and their heirs through the Central Civil Registration System (MERNIS) and Population and Citizenship Affairs System (NVI) sends Article 8 notifications to invite them to participate in the negotiations.

37 through Article 8 + 406 through Article 10) of the parcels as of mid July 2026. Considering the construction schedule of the Project, Article 27 **was not applied by KGM to date**. Instead, Article 10 was implemented in cases where Article 8 agreement protocols could not be signed with the right holders.

- In **Section 1** (KM 0 – 35), there are 1,068 private parcels subject to expropriation in this Section. **Article 8** negotiation meetings were initiated in February 2026 for a total of **792** parcels in this Section. As of mid July 2026, Article 8 agreement has been reached for **353** parcels, with **Article 10** lawsuits due to be filed by KGM – KÖSOB for **439** parcels for which agreement protocols could not be signed.
- In **Section 2**, there are 747 private parcels subject to expropriation. **Article 8** negotiation meetings were initiated only in KM 58 – 60 stretch in February 2026 for a total of **101** parcels in entire Section 2. As of mid July 2026, **Article 8** agreement has been reached for **13** parcels, with **Article 10** lawsuits are ongoing for **46** parcels (42 with annulment decisions issued by the court + 4 with expropriation compensation deposited by KGM and annulment decision is yet to be issued by the court) and due to be filed by KGM – KÖSOB for **42** parcels for which agreement protocols could not be signed.
- In Section 2 (KM 35 – 70), Article 8 negotiation meetings are planned to be initiated earliest in **Q4 2026** following the completion of valuation reports and approval of the valuation by KGM's **Public – Private Partnership Regional Directorate** (**KÖSOB** – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*).

For ongoing and future expropriation works, Article 27 would be used by KGM as a last resort, only after Article 8 negotiations and consultations with the owners and shareholders (including rightful heirs) have been held and failed, or if they do not attend the reconciliation negotiations despite the consultation efforts made, in cases when there is necessity and urgency as stipulated under Expropriation Law and the Presidential Decree on Accelerated Expropriation Decision issued for Project. Currently**,** for the parcels for which agreement protocols could not be signed in the Project, **KGM – KÖSOB has opted to proceed with Article 10 following the decision of the General Directorate.**

The status of the expropriation of private parcels – including agreement and court case rates – is provided in the RAP – Section 2.6.

Environmental and Social Due Diligence (ESDD) Process

In **October 2024,** the Lenders retained an Independent Environmental and Social (E&S) Advisor (Lender's E&S Advisor – **LESA**) to carry out Environmental and Social Due Diligence (ESDD) for the **Kınalı – Malkara Section** and to conduct an independent review of the ESIA disclosure package – including the RPF and RAP – in accordance with the applicable international standards, prior to public disclosure and to evaluate the compliance of land acquisition activities with the standards and requirements of the Lenders.

The RPF was reviewed, and the final version incorporating the comments and feedback provided by the LESA was approved by the Lenders' Environmental and Social Advisor (LESA) on 16 December 2025. This RAP, and any future updates, will be subject to review by the LESA prior to finalisation.

The RAP and Its Implementation

This **RAP has been prepared for the Project in line with the IFC PS5 and other applicable international standards, and in accordance with Project ESAP requirements,** with the objective of developing and implementing measures to mitigate these risks and impacts on individuals owning and/or or using the affected lands, houses and structures.

The RAP identifies individuals who will be physically and economically displaced and establish eligibility criteria and entitlements for the compensation of losses and impacts. It also outlines livelihood restoration, improvement, and assistance measures to be provided to owners and users of affected lands – formal or informal – and structures, and residents of affected houses. These entitlements and measures are in addition to the compensation provided by KGM in accordance with the Expropriation Law. **A detailed Entitlements Matrix is included in** Section 7.3**.**

The additional costs associated with RAP implementation will be covered by the SPV through a RAP Fund, **which will be allocated and managed by the SPV** – separate from KGM's Expropriation Budget.

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 approval of the final RAP by the Lenders.**

The SPV will present the RAP with KGM once it has been reviewed by the Lenders and the LESA.

Following the approval of the RPF by the Lenders and the LESA in December 2025, the SPV has begun implementing its key principles, which also form the backbone of this RAP. **Since December 2025**, the SPV, in consultation and coordination with the KGM, communicates the **cut-off date** in each affected settlement[14] prior to start of official expropriation procedures. Accordingly, the KÖSOB and the SPV post the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions in Section 1, Section 2 (KM 58 – 60), and Section 3. These are posted in the offices of the mukhtars within the respective affected settlements. **In Section 3**, the SPV will post notifications in the affected settlements, in alignment with the construction schedule and priorities (starting from August 2026), to inform affected people that crops cultivated on parcels after the completion of expropriation under Article 8 or Article 10 (or Article 27 should this is applied in the Project) will not be eligible for additional compensation (i.e. crop payment), as these parcels have been formally allocated to the Project and avoid new cultivation on parcels for which expropriation procedures have already been completed (through Article 8 or 10, or Article 27 should this is applied in the Project) during the current agricultural production period. Where there are standing crops on parcels for which the expropriation process has been completed, Project entry will be postponed until after the harvest, where feasible under the construction schedule, in accordance with the Article 20 of the Expropriation Law. Where this is not feasible, compensation for the crops will be provided by the Project for the current agricultural production period prior to land entry, provided that such crops were not already included in the expropriation valuation.

During the RAP process, a **Project Affected People (PAP) Database for Land Acquisition** has been developed. This database incorporates information on owners and shareholders identified by the KÖSOB (through national engineering firm/valuation contractor) through the census and asset inventory process, as well as formal and informal users of affected lands, residential and non-residential structures, and trees, identified by the RAP Consultant Team since the RAP field surveys commissioned in December 2025. The database also includes contact information and information on any identified vulnerabilities among affected people.

The **PAP Database** is designed as a **living document** and will be **regularly updated by the SPV** throughout RAP implementation to reflect any newly identified users or changes in circumstances. The SPV will continue **engaging** with the PAPs **on an ongoing basis**, as outlined in this RAP.

As part of RAP implementation, the SPV will provide **livelihood restoration, improvement, and assistance measures** to PAPs to enable them to restore – and where possible, improve – their livelihoods in the post-land acquisition period.

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

The SPV will provide regular updates to KGM on RAP implementation through **monthly progress reports** and, where needed, on a case-by-case basis via correspondence or regular meetings. The SPV will continue to engage with KGM as necessary to support effective RAP implementation.

The RAP is a living document and will be updated as necessary to include any additional categories of PAPs or individuals identified during RAP implementation, along with the entitlements required to be provided to them in order to ensure compliance with applicable international standards.

[14] This is applicable to Section 1 and Section 2, as the Article 8 procedures in Section 3 had already been completed by the time the RPF studies commenced in October 2025.

RAP Monitoring

RAP implementation will be periodically monitored both internally by the SPV and externally by the Lenders and their LESA to assess progress and identify any areas where improvements or corrective actions may be required.

The SPV will monitor RAP implementation internally on a **monthly** basis and submit **quarterly self-monitoring reports** to the Lenders and the LESA incorporating the findings of internal RAP monitoring. The frequency of external RAP monitoring and reporting by the LESA will be **quarterly during RAP implementation**, which will largely coincide with the RAP implementation period, and **bi-annually** (once every 6 months) during post-implementation until RAP Completion Audit.

Following the completion of RAP implementation period, post-implementation monitoring will be conducted by the SPV for up to two years and reported to Lenders, until a **RAP Completion Audit** will be carried out by external independent resettlement specialists – with approval from Lenders.

Stakeholder Engagement and Grievance Mechanism for Land Acquisition related Grievances/Feedback

The Project has a **Stakeholder Engagement Plan (SEP)** which also describes consultation and information dissemination activities regarding land acquisition and resettlement. The Project SEP has been disclosed at the Project website[15].

In February 2026, ESIA **Public Disclosure and Consultation** meetings were held by the SPV, with the participation of KÖSOB, in the districts of Silivri, Çorlu, Marmaraereğlisi, Malkara and Süleymanpaşa. An updated SEP, incorporating information on the ESIA Public Disclosure and Consultation, has been prepared by the SPV and submitted to the Lenders and the LESA. During the ESIA Public Disclosure and Consultation meetings, an Expropriation Information Guide, including information on the RAP and approved by KGM – KÖSOB, was distributed to the affected people who participated in the meetings held in February 2026. This Guide was also published[16] on the Project's website in January 2026, in Turkish and English. The people affected by the Project's land acquisition impacts began to be informed about the RAP, compensation principles and entitlement framework, initially during the RAP surveys held in November 2025 and February – April 2026. Following the signing of the Finance Agreement in April 2026, the SPV has started individually engaging with PAPs, including owners and users of the residential and non-residential structures as well as affected businesses in line with the Project's construction and expropriation programmes and informing people about the RAP entitlements. Records of the engagement activities carried out to date are maintained by the SPV in the Project's Stakeholder Engagement Log, which is updated regularly.

The RAP separately includes a detailed **RAP Disclosure and Engagement Action Plan** for disclosure and implementation phases. This Plan will be implemented in alignment with the Project SEP.

In accordance with the Project SEP, a **Project-specific Grievance Mechanism has been established and activated by the SPV** in accordance with applicable international standards. The mechanism is designed to be culturally appropriate and transparent, and is available free of charge and without retaliation. It allows grievances to be submitted anonymously and handled confidentially and will remain accessible to all stakeholders – including owners, shareholders, and users of affected lands and structures – throughout the construction and operation phases of the Project.

Besides the Project-specific Grievance Mechanism, KGM, as the authority responsible for expropriation, also 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[17], which will remain operational in parallel with the Project's grievance mechanism.

If a grievance is not resolved to the satisfaction of the complainant, the Project offers an **appeal mechanism**. In such cases, the SPV, in consultation with the Lenders, 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.

[15] 1915canakkale.com/cmsfiles/Galleries/18348/COK-Kinali-Malkara-Motorway-Stakeholder-Engagement-Plan.pdf?v=2

[16] Turkish: https://www.1915canakkale.com/cmsfiles/Galleries/18348/COK-Kinali-Malkara-Otoyolu-Kamulastirma-Bilgi-Rehberi.pdf?v=2; English: https://www.1915canakkale.com/cmsfiles/Galleries/18348/COK-Kinali-Malkara-Motorway-Expropriation-Information-Guide.pdf?v=2

[17] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx

Guide to Land Acquisition and Compensation (GLAC)

A **Guide to Land Acquisition and Compensation (GLAC)**, providing a concise, clear, and non-technical summary of the RAP, has been prepared by the Project **following the completion of draft RAP** in Q2 2026**.** Following its approval by the Lenders, the GLAC was disclosed[18] on the Project's website in Turkish and English. Hard copies of the GLAC will be distributed to and presented to affected people to ensure they are fully informed about the land acquisition process, their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements. The distribution of the approved version to the settlement heads and PAPs is anticipated to commence in Q3 2026.

Roles and Responsibilities for RAP Implementation

The BOT Contract defines the land acquisition related responsibilities of KGM, along with the contractual responsibilities of the SPV.

The SPV holds contractual responsibilities for covering a portion of the Expropriation Cost and acquiring land use rights and permits for temporary or permanent facility sites, where such sites are located outside the Project's expropriation corridor. **The SPV is responsible for implementing the RPF and RAP** in collaboration with KGM.

The SPV has established a **RAP Executive Committee in July 2026** to facilitate the effective, timely and transparent implementation of the RAP, and provide oversight and coordinated decision-making for the RAP implementation, particularly the allocation and disbursement of RAP Fund resources, throughout the implementation period. **The first RAP Committee meeting was held on 13 July 2026.**

The SPV has started setting up a dedicated **RAP Implementation Team** responsible for the day-to-day delivery of RAP measures in collaboration with KGM. The team is supervised by the Deputy Technical Director (appointed) and led by SPV's E&S Manager (appointed) and include a Resettlement Specialist (appointed), two Community Liaison Officers (CLOs), and a Senior E&S Specialist (appointed), who are supported by EPC's expropriation team led by an Expropriation Manager (appointed). The core team is supported by both in-house teams (design, construction, finance, and legal) and third-party implementation partners and consultants.

KGM has a Public **– Private Partnership Regional Directorate** (**KÖSOB** – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*) headquartered in Bursa Province[19]. The Project falls within the responsibility area of the KÖSOB. For regular Project management issues, the SPV's RAP Implementation Team and EPC's Expropriation Manager coordinate and collaborate closely with this Directorate.

The SPV, with support from the RAP Consultant, presented the key principles of the RPF and the planned RAP studies to the Immovables Chief Engineer's office at KÖSOB on **3 December 2025.**

The SPV will submit and present the RAP to KÖSOB (in Turkish) following approval of the documents by the Lenders. The SPV will keep the Lenders informed about this process, provide relevant documentation on the communication and meetings with KÖSOB, and share any verbal or written feedback received from KÖSOB, if any. Any feedback from KÖSOB on the RAP will be incorporated into the documents, as appropriate, in consultation with and subject to the approval of the Lenders.

Through monthly construction progress reports, the SPV will keep KGM informed about the RAP implementation progress and compensation and assistance provided through the RAP Fund. Specific requirements of KGM, if any, will be taken into consideration through a consultative process. KGM – through KÖSOB – has been supporting the SPV and the RAP Consultant Team with the provision of land acquisition data necessary for RAP preparation (including RPF completed in December 2025) and has expressed its commitment to continue supporting them with the timely and sufficient delivery of necessary data (e.g. land acquisition, grievance management, and organisational capacity, among others) during RAP implementation, without any delay or restriction.

In addition to ongoing communication between the SPV, EPC and the KÖSOB, at least **monthly** coordination meetings will be held during construction phase.

[18] Turkish: 1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-edinimi-ve-tazminat-kilavuzu-aetk.pdf; English: 1915canakkale.com/cmsfiles/Galleries/18348/cok-guide-to-land-acquisition-and-compensation-glac.pdf
[19] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx

Budget (RAP Fund)

The SPV will allocate and manage a RAP Fund (see RAP – Chapter 16) – separately from the KGM's Expropriation Budget – to finance the costs associated with the implementation of RAP measures that are not covered under national legislation, as well as to provide for the human resources required to ensure effective implementation.

The key budget items under the RAP Fund are listed below, and each budget item includes sub-items in accordance with the entitlements and assistance outlined in this RAP.

- **Top-up Cash Compensation** to achieve Full Replacement Value (including **Depreciation Cost** of residential and non-residential structures on affected lands (for structure owners), where the final expropriation value does not meet the full replacement cost of the affected asset, and the **Transaction Costs)**
- Cash Compensation to cover Replacement Cost for owners of **Informal Structures** and **Trees** on public or private lands
- **Crop payments** (in case land is entered prior to harvest)
- Compensation for **Value or Income Loss** for **Orphan Lands**
- **House Relocation Support Package** (incl. Moving Allowance)
- **Business Relocation Support Package** (incl. Moving Allowance)
- **Relocation Packages for Special-use Assets** (dog shelter and pet graves)
- **Livelihood Restoration Plan** (**LRP**) Fund
- **Vulnerable Groups Fund**
- **Small Costs Fund**
- **Governance and Administrative Costs** for human resources, equipment and materials, and consultancy services required to support RAP implementation
- **Monitoring** costs including RAP **Completion Audit**
- **Contingency Fund** (5%)

The indicative budget for RAP implementation through the **RAP Fund has been calculated for the full alignment.**

This calculation is based on the approved expropriation plans, lists and valuation data **for Section 1** (KM 0 – 35), **Section 2** (KM 58 – 60) **and Section 3** (KM 70 – 105). For the **remainder of Section 2** (KM 35 – 70, excluding KM 58 – 60), the cadastral approval process was recently completed in May 2026; therefore, the available expropriation plans submitted to the cadastral office for approval have been taken into consideration. Once the valuation data (including structure valuation forms) for the remainder of Section 2 become available, the **RAP, including the RAP Budget, will be updated** accordingly to incorporate approved expropriation and valuation data, relevant assessments and budget calculation for Section 2.

The RAP Budget includes a **contingency fund amounting to 5%** (excluding the contingency itself) of the RAP Budget to cover any unforeseen costs that may arise during RAP implementation.

1. Introduction

This Resettlement Action Plan (RAP) has been prepared by GEM Sustainability Services and Consultancy Inc. (GEM or the RAP Consultant) for the **Kınalı – Malkara Motorway Project** (the Project or **KM Section**) of **Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş),** a joint venture of Limak İnşaat Sanayi ve Ticaret A.Ş. (Limak, an affiliated company of Limak Holding) and Yapı Merkezi of Türkiye and Daelim and SK of South Korea. ÇOK A.Ş. serves as the Special Purpose Vehicle (SPV) for the Project – **with Limak being the sole sponsor for KM Section** – and is also referred to as the Project Company, Appointed Company, or the Company throughout this Report.

The Project is a public-private partnership (**PPP**), with the granting authority being the **Republic of Türkiye Ministry of Transportation and Infrastructure** (**MoTI**), represented by the **Directorate General of Highways** (**KGM**). ÇOK A.Ş. acts as the private partner under the **Built-Operate-Transfer (BOT)** Contract.

The Project is implemented under an **Amendment** to the BOT Contract of the 1915 Çanakkale Motorway and Connection Roads Project.

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling **1,650 days** is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the **construction, which is defined as 36 months following the financial close** and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date.

The SPV has approached international financial institutions (IFIs) and commercial banks (referred to collectively as potential "lenders"), to finance the Project. Accordingly, the RAP has been developed in accordance with the following standards of the lender groups (the "applicable international standards"):

- International Finance Corporation (IFC) Performance Standards (PSs) (2012),
- Equator Principles (EP) 4 (2020), and
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the "Common Approaches" adopted in 2012 and revised by the OECD Council in 2016 and 2024).

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

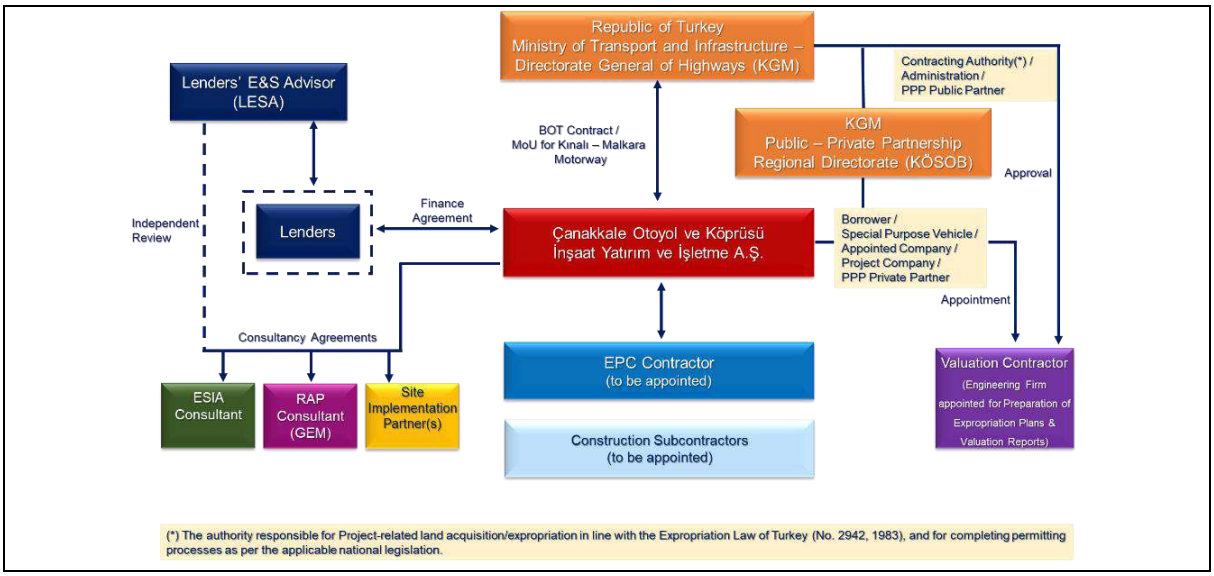


Figure 1-1. Project Structure and Key Stakeholders as defined under the BOT Contract and the Finance Agreement

According to this structure, the MoTI, specifically the KGM, is positioned at the top as the Contracting Authority. KGM is responsible for executing project-related land acquisition and expropriation in accordance with the Expropriation Law of Türkiye, as well as completing the permitting processes in line with applicable legislation. The SPV under the BOT Contract has appointed an EPC Contractor (**Limak İnşaat Sanayi ve Ticaret A.Ş**) in April 2026, which in turn will contract and manage the activities of construction subcontractors. The SPV maintains consultancy agreements with key technical partners, including the ESIA Consultant, the RAP Consultant (GEM), and site implementation partners, and the lenders are supported by their own E&S Advisor (Lender's E&S Advisor – LESA). A separate engineering firm (valuation contractor) has been appointed by the Project, with the approval of KGM, to prepare expropriation plans and conduct the valuation works required under the Expropriation Law of Türkiye (Law No. 2942, 1983).

The RAP has been developed based on a comprehensive review of expropriation data compiled by the valuation contractor, with the approval of KGM, in accordance with the Expropriation Law and KGM Technical Specifications, and the outcomes of the RAP field surveys conducted in **January, February and March 2026**, as outlined in Chapter 5. **It is a living document and will be updated, as necessary throughout the implementation period.**

As of the date of this document, expropriation data, including the approved expropriation plans, lists and valuation data, are **available for Section 1** (KM 0 – 35), **Section 2** (KM 58 – 60) **and Section 3** (KM 70 – 105), while the cadastral approval process for the **for the remainder of Section 2** (KM 35 – 70, excluding KM 58 – 60) is ongoing.

Accordingly, this **RAP** has been prepared for the full Motorway alignment, incorporating approved expropriation and valuation data for Section 1 (KM 0 – 35), Section 2 (KM 58 – 60) and Section 3 (KM 70 – 105) and expropriation data submitted for the remainder of Section 2 to the cadastral office for approval. Once the approved expropriation plans and valuation data (including structure valuation forms) for the remainder of Section 2 becomes available, the **RAP will be updated** accordingly to incorporate approved expropriation and valuation data, relevant assessments and budget calculation for Section 2. The key Project milestones relevant to RAP are presented in Figure 1-2.

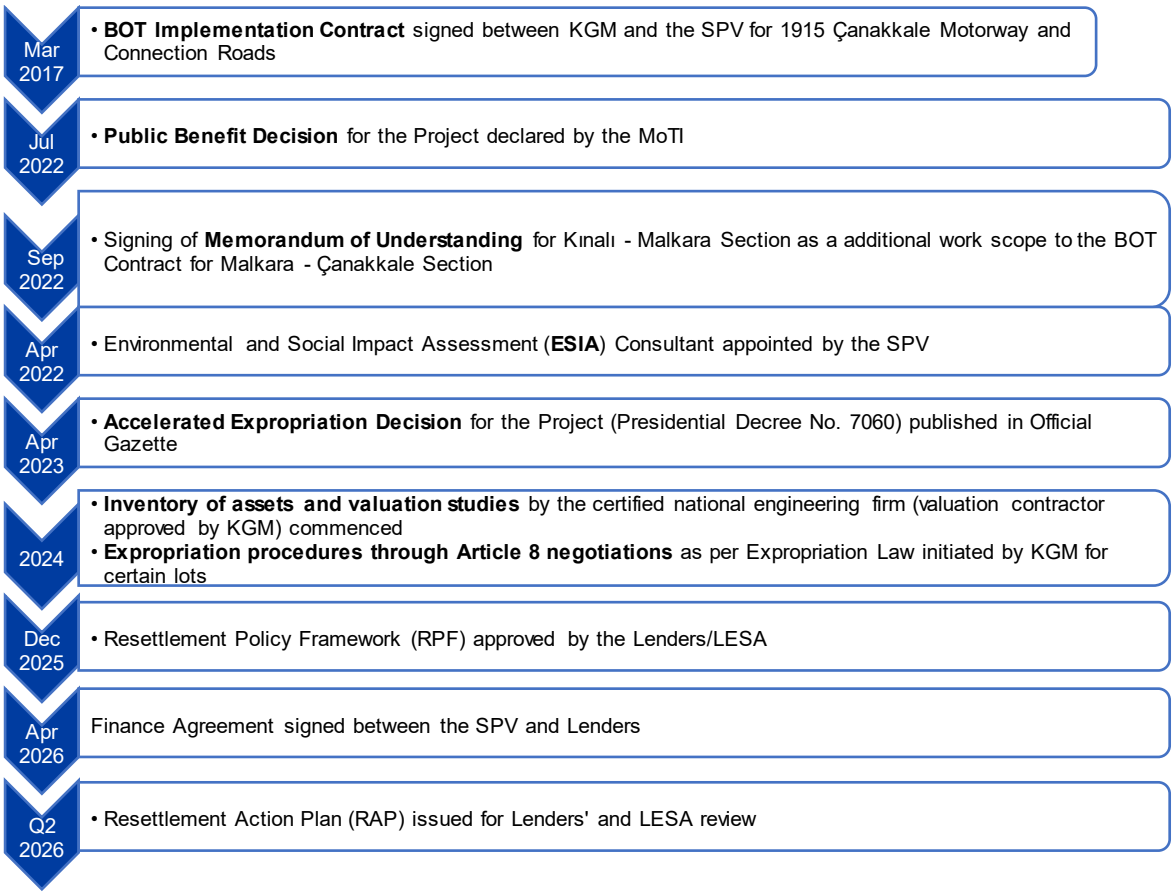


Figure 1-2. Key Project Milestones Relevant to RAP

2. Project Description

The **Kınalı–Malkara Motorway** is planned as a segment of the **Kınalı–Tekirdağ–Çanakkale–Savaştepe Motorway,** aiming to offer uninterrupted transportation from **İstanbul to Çanakkale**. The route starts from the **Kınalı Junction** on the **İstanbul–Edirne O-3 Motorway** and extends westward. It passes north of **Tekirdağ**, follows the northern part of **Şarköy**, and reaches **Malkara**. From there, it connects with the **Malkara–Çanakkale Motorway** and the **1915 Çanakkale Bridge**, which was officially inaugurated on 18 March 2022.

The Project consists of three sections:

- **Section 1:** KM 0 – 35
- **Section 2:** KM 35 – 70
- **Section 3:** KM 70 – 105

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

During the 1/1,000 scale design and engineering works, the SPV introduced revisions to the 1/5,000 scale preliminary project design included in the MoU signed for the KM Section, in order to minimise impacts on lands and structures along the Motorway route, as outlined in Section 2.6.5.

Table 2-1 provides a summary of Project's key components. The design speed is 140 km/h for the main carriageway and 110 km/h for the connection roads. A list of engineering structures (bridges, overpasses, underpasses and culverts), together with their locations, is provided in Appendix A.

Table 2-1. Summary of Key Project Components

Component	Information according to Current Design
Length of the Motorway	105.2 km Main Road + 21.8 km Connection Roads
Cross Sections	Main Motorway: 2x3 lanes Connection Roads: 2x2 lanes
Interchanges	9 (Kınalı-Silivri, Çanta, Marmaraereğlisi, Çorlu Airport, Karatepe, Tekirdağ East, Tekirdağ, Hayrabolu, Tekirdağ West)
Overpasses	52
Underpasses – Portal; Girder	31; 20
Culverts	158
Operation and Maintenance Centre	1 - KM 60+000
Salt Depots	KM 16+000 KM 83+500
Motorway Service Facilities (MSFs)	KM 16+000 (Type C) KM 46+000 (Type C) KM 83+500 (Type B)
Construction Camp Sites	**Main** Construction Camp Site (KM 60+000) **Satellite** Construction Camp Site (KM 16+000) **Satellite** Construction Camp Site (KM 83+500)
Toll Booths	Nine (9) **toll plazas** at the following chainage: • Main Road KM 3+800: Kınalı-Silivri Interchange Toll Plaza • Çanta Connection Road KM 0+800: Çanta Interchange Toll Plaza • Marmaraereğlisi Connection Road KM 0+800: Marmaraereğlisi Interchange Toll Plaza • Çorlu Connection Road KM 0+900: Çorlu Interchange Toll Plaza • Karatepe Connection Road KM 0+800: Karatepe Interchange Toll Plaza • Tekirdağ East Connection Road KM 1+000: Tekirdağ East Interchange Toll Plaza • Tekirdağ Connection Road KM 0+600: Tekirdağ Interchange Toll Plaza • Hayrabolu Connection Road KM 0+800: Hayrabolu Interchange Toll Plaza • Tekirdağ West Connection Road KM 0+750: Tekirdağ West Interchange Toll Plaza
Lighting	To be provided at the interchanges, toll booths and MSFs.

Source: SPV, March 2026.

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Legend

- Kınalı – Malkara Motorway / KM 0 – 35 Section
- Kınalı – Malkara Otoyolu / KM 0 – 35 Bölümü
- Kınalı – Malkara Motorway / KM 35 – 70 Section
- Kınalı – Malkara Otoyolu / KM 35 – 70 Bölümü
- Kınalı – Malkara Motorway / KM 70 – 105 Section
- Kınalı – Malkara Otoyolu / KM 70 – 105 Bölümü
- City Boundary / İl Sınırı
- District Boundary/ İlçe Sınırı
- Interchanges / Kavşaklar
- District Center / İlçe Merkezi

GEM Sustainability Services and Consultancy Inc.

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

N

0 10 20 km

Basemap Source: Google Earth

Figure 2-1. Kınalı – Malkara Motorway Route

2.1. Project Location and Route

The Project is located in **İstanbul and Tekirdağ** provinces and traverses the boundaries of **5 districts** (Silivri in İstanbul and Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara in Tekirdağ) and **39**[20] **neighbourhoods**.

The neighbourhoods along the Project route are shown in Figure 2-2 districts in İstanbul province), Figure 2-3 (districts in Tekirdağ province, Silivri and Çorlu districts) and Figure 2-4 (districts in Tekirdağ province, Süleymanpaşa and Malkara districts). The lengths of the main road sections and connection roads are provided in Table 2-2 and Table 2-3.

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

Table 2-2. Main Road per District

Section	District	Start KM	End KM	Approximate Length
Section 1: KM 0 – 35	Silivri	0+000	17+600	17.6 km
	Marmaraereğlisi	17+600	25+550	8.0 km
Section 1: KM 0 – 35 **Section 2:** KM 35 – 70	Çorlu	25+550	43+600	18.0 km
Section 2: KM 35 – 70 **Section 3:** KM 70 – 105	Süleymanpaşa	43+600	95+450	51.9 km
Section 3: KM 70 – 105	Malkara	95+450	105+000	9.5 km
Total				**105.0 km**

Table 2-3. Connection Roads

Section	District	Connection Road	Start KM
Section 1: KM 0 – 35	Silivri	Kınalı-Silivri	1+440
		Çanta	12+240
	Marmaraereğlisi	Marmaraereğlisi	20+770
		Çorlu Airport	24+020
Section 2: KM 35 – 70	Çorlu	Karatepe	38+000
	Süleymanpaşa	Tekirdağ East	51+360
		Tekirdağ	59+800
		Hayrabolu	67+700
Section 3: KM 70 – 105	Süleymanpaşa	Tekirdağ Batı	73+200

[20] The accelerated expropriation decision for the Project initially covered 38 neighbourhoods; however, Mahramlı Neighbourhood of Tekirdağ, Malkara indicated in the decision is not affected by the Project's land acquisition according to the current expropriation plans. According to the current expropriation lists, two additional neighbourhoods from Marmaraereğlisi – Sultanköy and Cedit Ali Paşa – have been added, bringing the total number of affected neighbourhoods to 39.

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

District/Neighbourhood	Section 1 KM 0 – 35	Section 2 KM 35 – 70	Section 3 KM 70 – 105	Number of Settlements
Silivri district				
Alipaşa	X			8
Yolçatı	X			
Semizkumlar	X			
Çeltik	X			
Sancaktepe	X			
Balaban	X			
Değirmenköy	X			
Gümüşyaka	X			
Marmaraereğlisi district				
Sultanköy	X			5
Cedit Ali Paşa	X			
Yakuplu	X			
Türkmenli	X			
Çeşmeli(*)	X	X		
Çorlu district				
Seymen	X			5
Şahpaz	X			
Türkgücü	X			
Yenice		X		
Maksutlu		X		
Süleymanpaşa district				
Karaevli		X		18
Husunlu		X		
Gazioğlu		X		
Köseilyas		X		
Gündoğdu		X		
Kayı		X		
Eskicami		X		
Zafer		X		
Aydoğdu		X		
Yağcı		X		
Seymenli			X	
Güveçli			X	
Nusratlı			X	
Karahisarlı			X	
Nusratfakı			X	
İnecik			X	
Akçahalil			X	
Kınıklar			X	
Malkara district				
Yenice			X	3
Hereke			X	
Ahievran			X	
Total				**39**

(*) This settlement falls within both KM 0 – 35 and KM 35 – 70 sections; however, it has been counted only once to avoid double counting.

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Legend

- Kınalı – Malkara Motorway Expropriation Corridor/ Istanbul City / Kınalı – Malkara Otoyolu Kamulaştırma Koridoru / İstanbul İli
- Neighbourhood Centers / Mahalle Merkezleri
- District Center / İlçe Merkezi

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Kınalı - Malkara Motorway / *Kınalı - Malkara Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Kınalı-Malkara Motorway Route - İstanbul City / *Kınalı-Malkara Otoyol Güzergahı Üzerindeki Yerleşimler - İstanbul İli*
Prepared for / *Görevli Şirket*	:	Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

N

0 1 2 km

Basemap Source: Google Earth

Figure 2-2. Settlements along the Kınalı – Malkara Motorway Route – **İstanbul** Province

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Legend

- Kınalı – Malkara Motorway Expropriation Corridor/ Tekirdag City / Kınalı – Malkara Otoyolu Kamulaştırma Koridoru / Tekirdağ İli
- District Boundaries / İlçe Merkezleri
- Neighbourhood Centers / Mahalle Merkezleri
- District Center / İlçe Merkezi

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Kınalı - Malkara Motorway / *Kınalı - Malkara Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Kınalı-Malkara Motorway Route - Tekirdag City / *Kınalı-Malkara Otoyol Güzergahı Üzerindeki Yerleşimler - Tekirdağ İli*
Prepared for / *Görevli Şirket*	:	Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

N

0 2.5 5 km

Basemap Source: Google Earth

Figure 2-3. Settlements along the Kınalı – Malkara Motorway Route – **Tekirdağ** Province, **Marmaraereğlisi** and **Çorlu** districts

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Legend

- Kınalı – Malkara Motorway Expropriation Corridor/ Tekirdag City / Kınalı – Malkara Otoyolu Kamulaştırma Koridoru / Tekirdağ İli
- District Boundaries / İlçe Merkezleri
- Neighbourhood Centers / Mahalle Merkezleri
- District Center / İlçe Merkezi

GEM Sustainability Services and Consultancy Inc.

Project Name / *Proje Adı*	:	Kınalı - Malkara Motorway / *Kınalı - Malkara Otoyolu*
Map Title / *Harita Başlığı*	:	Settlement along the Kınalı-Malkara Motorway Route - Tekirdag City / *Kınalı-Malkara Otoyol Güzergahı Üzerindeki Yerleşimler - Tekirdağ İli*
Prepared for / *Görevli Şirket*	:	Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş.
Projected Coordinate System / *Projeksiyon Koordinat Sistemi*	:	WGS 84
Sheet Size / *Sayfa Boyutu*	:	A3

N
0 5 10 km

Basemap Source: Google Earth

Figure 2-4. Settlements along the Kınalı – Malkara Motorway Route – **Tekirdağ** Province, **Süleymanpaşa** and **Malkara** districts

2.2. Expropriation Corridor

The **expropriation corridor** defines the boundaries within which land acquisition and expropriation activities are carried out by KGM for the Motorway and associated connection roads. All construction activities related to the main Motorway, such as excavation, embankment works, and the installation of permanent infrastructure, are executed within this designated corridor. Permanent components including **engineering structures, interchanges,** and **toll booths** are also located entirely within the corridor.

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

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

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

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

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

Following the completion of construction works, the **entire expropriation corridor** along the Motorway alignment **will be fenced** in accordance with KGM Technical Specifications.

During the **operational phase** of the Project, access to and use of this fenced corridor by local communities and unauthorised individuals will be strictly prohibited, both for operational integrity and to ensure health and safety.

2.3. Project Components

The ESIA Report (March 2025) disclosed by the Project in August 2025 includes a detailed description of the Project and its components, as well as the Motorway design criteria.

In summary, the main Project components include the following (no tunnels or viaduct according to current Project design):

- Interchanges
- Overpasses and Underpasses (girder or portal)
- Culverts
- Operation and Maintenance (O&M) Centre
- Motorway Service Facilities (MSFs or service areas)
- Salt Depots

In addition to these main components, there will be:

- Excavated materials storage sites (permanent)
- Temporary construction facilities (including construction camp sites – main and satellite, concrete plants, asphalt plants, prestressing beam production plants, and quarries)

Figure 2-6 below presents a linear schematic (itinerary) of the Motorway. It illustrates the full alignment of the motorway from Silivri to Malkara, highlighting the sequence and location of key engineering structures and Motorway components, including interchanges, O&M centre service areas, and temporary construction facilities.

The O&M Centre, MSFs and construction camp sites, including the asphalt plants, concrete plants and prestressing beam production plants, **have been located within the Motorway's expropriation corridor to avoid any additional land acquisition outside the corridor.**

Further information on the interchanges, O&M Centre, MSFs and temporary facilities is provided in the following sub-sections below.

2.3.1. Interchanges

The list of planned interchanges, which will consist of 2-lane carriageways, is provided in Table 2-5.

Table 2-5. List of Planned Interchanges

No.	Interchange Name	Motorway KM
1	Kınalı – Silivri	1+440
2	Çanta	12+240
3	Marmaraereğlisi	20+770
4	Çorlu Airport	24+020
5	Karatepe	38+000
6	Tekirdağ East	51+360
7	Tekirdağ	59+800
8	Hayrabolu	67+700
9	Tekirdağ West	73+200

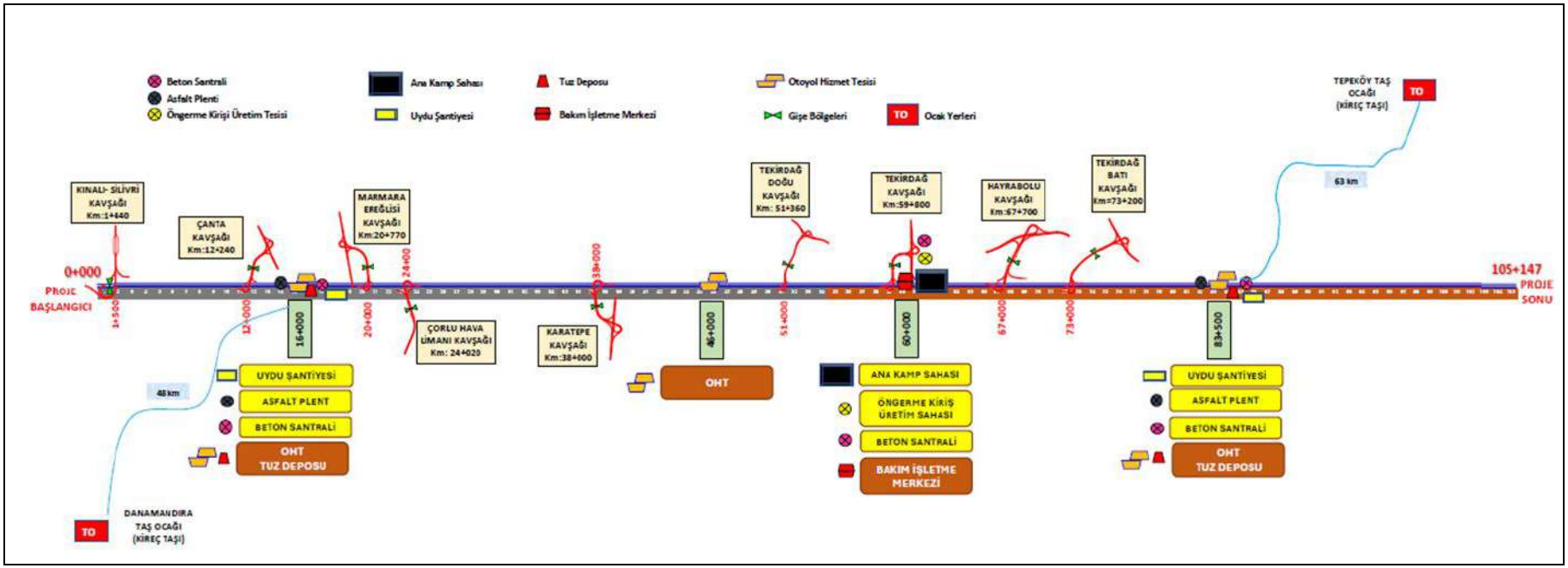


Figure 2-6. Project Itinerary (dated March 2026)

2.3.2. Overpasses, Underpasses and Culverts

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

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

A detailed list of all planned overpasses, underpasses, and culverts, including their locations and dimensions, is provided in Appendix A. A summary of these structures, including their numbers and total lengths according to their respective dimensions is provided in Table 2-6.

Table 2-6. Summary of Project Overpasses, Underpasses and Culverts

Type of Structure	Dimensions	Number of Structures	Total Length (m)
Overpasses	10.00 m	14	663.41
	12.00 m	19	907.20
	12.75 m	1	58.40
	13.00 m	1	51.50
	13.25 m	5	336.46
	14.25 m	7	436.55
	19.75 m	2	78.52
	20.25 m	2	142.71
	38.50 m	1	39.00
Total		**52**	**2,713.75**
Underpasses (Girder)	13.25 m x 13.25 m	2	66.20
	17.50 m x 17.50 m	15	940.5
	21.00 m x 17.50 m	1	39.65
	21.80 m x 17.50 m	1	50.00
	31.69 m x 37.28 m	1	75.48
Total		**20**	**1,171.83 m**
Underpasses (Portal)	7.0 m x 5.5 m	7	361.84
	9.0 x 5.5 m	15	767.51 m
	12.0 m x 5.5 m	7	389.34 m
	12.0 m x 6.0 m	1	58.89 m
	2 x (12.0 m x 5.5 m)	1	87.45 m
Total		**31**	**1,665.03**
Culverts	1.5 m x 1.5 m	6	62.34
	2.0 m x 2.0 m	96	6707.71
	2.0 m x 2.5 m	7	561.03
	2.5 m x 2.0 m	1	64.63
	2.5 m x 2.5 m	17	1572.52
	2.5 m x 3.0 m	3	324.51
	3.0 m x 2.0 m	1	26.50
	3.0 m x 2.5 m	1	54.01
	3.0 m x 3.0 m	4	476.60
	4.0 m x 3.0 m	6	565.14
	4.0 m x 4.0 m	5	472.38
	5.0 m x 2.5 m	2	51.48
	5.0 m x 3.0 m	1	157.76
	5.0 m x 4.0 m	1	108.56
	5.0 m x 5.0 m	2	173.45
	6.0 m x 5.0 m	2	128.31
	8.0 m x 5.0 m	3	346.24
Total		**158**	**11,853.17 m**

2.3.3. Operation and Maintenance Centre

There will be **one** operation and maintenance (O&M) centre on the Motorway as given in Table 2-7. The O&M centre will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

Table 2-7. O&M Centre

Road Part	KM	District	Settlement	Location
Main Road	60+000	Süleymanpaşa	Kayı	Within the Motorway's expropriation corridor

2.3.4. Salt Depots

The list of salt depots planned under the Project as part of the winter road maintenance system to be used during operations is provided in Table 2-8.

The salt depots that will be used to store road salt and other de-icing/anti-icing materials will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

Table 2-8. List of Planned Salt Depots

No	KM	District	Settlement	Location
1	16+000	Silivri	Değirmenköy	Within the Motorway's expropriation corridor
2	83+500	Süleymanpaşa	İnecik	Within the Motorway's expropriation corridor

2.3.5. Motorway Service Facilities (MSFs)

The list of MSFs planned under the Project is provided in Table 2-9. The MSFs will be located within the Motorway's expropriation corridor and, therefore, will be acquired as part of the Motorway's overall expropriation process.

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

Table 2-9. List of Planned MSFs

No	MSF Type	KM	District	Settlement
1	Type C	16+000	Silivri	Değirmenköy
2	Type C	46+000	Süleymanpaşa	Husunlu
3	Type B	83+500	Süleymanpaşa	İnecik

2.3.6. Excavated Materials Storage Sites

In addition to the Motorway components, the Project will include excavated material storage sites designated for the placement and storage of surplus materials from excavation works that are unsuitable for reuse.

According to the latest design information provided by the SPV, a total of **thirteen**[21] storage areas have been assessed.

The list of planned excavated material storage sites under the Project is provided in Table 2-10.

[21] According to the ESIA (March 2025) disclosed in August 2025, 15 storage sites were initially identified. Subsequently, 2 sites were excluded; one of which was removed following consultations with the Mukhtar and residents of Kayı neighbourhood in order to avoid impact on the settlement's only pasture area, and one was excluded as parts of the site are located within a protected area and in proximity to a municipal waste disposal facility.

Table 2-10. List of Planned Storage Areas

No	Section	Storage Area No	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or Public – shareholding status should be indicated)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	EIA Decision Status (as declared by the Company)
1	**Section 1:** KM 0 – 35	Çeltik-1	İstanbul	Silivri	Yolçatı	2+500	Outside	New	No	4416/1	Pasture	78,537.28	278,822.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	The EIA application will be submitted after the Project decides on the use of the site based on the outcomes of the land use permitting process, and before land entry.
										4413/2		134,953.19						
										4411/1		15,941,35						
										4415/66		12,627.70						
										4417/1		36,854.95						
2		Çeltik 2-3	İstanbul	Silivri	Çeltik	5+250	Outside	Former facility	No	204/1	Forest	5,230,696.84	63,084.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	**The permitting process is ongoing.**	Same as above
													100,191.00					
3		Seymen	Tekirdağ	Çorlu	Seymen	20+100	Outside	New	No	51/3	Pasture	506,404.92	109,685.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
4		Türkmenli	Tekirdağ	Marmaraereğlisi	Türkmenli	29+410	Outside	New	No	109/242	Pasture	298,933.62	100,374.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
5		Çeşmeli	Tekirdağ	Marmaraereğlisi	Çeşmeli	30+250	Outside	New	No	185/37	Pasture	355,809.13	378,809.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
										367/1		223,000.00				Change of allocation; allocation to the Project	**The permitting process is ongoing.**	
6		Türkgücü	Tekirdağ	Çorlu	Türkgücü	32+300	Outside	New	No	0/3823	Pasture	679,717.12	115,148.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
7	**Section 2:** KM 35 – 70	Husunlu	Tekirdağ	Süleymanpaşa	Husunlu	47+400	Outside	New	No	0/1210	Pasture	710,561.00	163,584.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
8		Köseilyas	Tekirdağ	Süleymanpaşa	Köseilyas	53+400	Outside	New	No	0/669	Pasture	381,000.00	41,799.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above

No	Section	Storage Area No	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or Public – shareholding status should be indicated)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	EIA Decision Status (as declared by the Company)
9	**Section 3:** KM 70 – 105	Seymenli 1-2-3	Tekirdağ	Süleymanpaşa	Seymenli	72+500	Outside	New	No	104/2	Forest	1,295,084.37	757,042.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	**The permitting process is ongoing.**	Same as above
						73+300				107/74	Pasture	192,000.00	126,693.00			Change of allocation; allocation to the Project	**The permitting process is ongoing.**	
						74+000				107/77	Pasture	127,000	31,648.00			Change of allocation; allocation to the Project	**The permitting process is ongoing.**	
10		Nusratfakı-1	Tekirdağ	Süleymanpaşa	Nusratfakı	80+500	Outside	New	No	102/83	Pasture	435,238.08	57,163.00	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
11		İnecik 1-2	Tekirdağ	Süleymanpaşa	İnecik	83+000	Outside	New	No	156/81	Pasture	59,318.94	59.318,94	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation; allocation to the Project	**The permitting process is ongoing.**	Same as above
						85+000				170/1	Forest	11,980,375.18	413,371.00		State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	**The permitting process is ongoing.**	
12		Kınıklar 1-2-3	Tekirdağ	Süleymanpaşa	Kınıklar	93+650	Outside	New	No	105/1	Forest	806,038.53	181,280.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	**The permitting process is ongoing.**	Same as above
					Akçahalil	94+000				101/1	Forest	5,737,820.40	332,936.00			Allocation through forestry permit	**The permitting process is ongoing.**	
					Kınıklar	94+00				105/1	Forest	806,038.53	255,747.00			Allocation through forestry permit	**The permitting process is ongoing.**	
										109/23	Forest	116,587.42				Allocation through forestry permit	**The permitting process is ongoing.**	
13		Yenice	Tekirdağ	Malkara	Yenice	98+500	Outside	New	No	157/1	Forest	809,894.76	131,935.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	**The permitting process is ongoing.**	Same as above

Source: SPV, March 2026

2.3.7. Temporary Construction Facilities

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

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

The SPV does not foresee the construction of any new access roads to construction sites or temporary construction facilities. Under the current design, the Project plans to use existing state and neighbourhood roads.

The number of temporary construction facilities planned under the Project is provided in Table 2-11.

The list of planned temporary construction facilities is provided in Table 2-12 to Table 2-14.

The final list of temporary facilities (quarries, plants, etc.) to be used under the scope of the Project will be confirmed by the SPV and EPC upon completion of the permitting processes.

Table 2-11. Summary of Temporary Construction Facilities

Component	Number of Facilities/Sites	Information according to Current Design
Construction Camp Sites	3	The camp sites are inside the Motorway's expropriation corridor: 1) **Main** Construction Camp Site (KM 60+000) 2) **Satellite** Construction Camp Site (KM 16+000) 3) **Satellite** Construction Camp Site (KM 83+500)
Concrete Batching Plants	3	All facilities are inside the Motorway's expropriation corridor.
Mechanical Plant (Plant-mix base and Plant-mix sub-base)	4	All facilities are inside the Motorway's expropriation corridor.
Asphalt Plant	4	All facilities are inside the Motorway's expropriation corridor.
Precast Girder Production Plant	1	All facilities are inside the Motorway's expropriation corridor.
Borrow Pits	4	**Outside** the expropriation corridor.
Quarries	3	**Outside** the expropriation corridor.

Source: SPV, March 2026.

The locations of the main and satellite construction camp sites have been selected at the MSF locations, which lie **within the Motorway's expropriation corridor** to avoid additional land acquisition for these temporary facilities.

In addition to the construction camp and facility sites planned by the SPV and EPC Contractor, there may be additional camp and facility sites proposed by subcontractors engaged in the Project. These potential sites will be identified and confirmed by the SPV and EPC Contractor in due course.

Should such sites be required, the SPV will monitor and ensure that the EPC Contractor secures all necessary permits and licences, and that the sites are operated in full compliance with national environmental legislation, requirements of this RAP and other applicable Lender standards, prior to the commencement of operations.

Land Acquisition for Temporary Facilities

The locations of the main and satellite construction camp sites included in the current design have been selected at the MSF locations, which lie within the Motorway's expropriation corridor to avoid additional land acquisition for these temporary facilities.

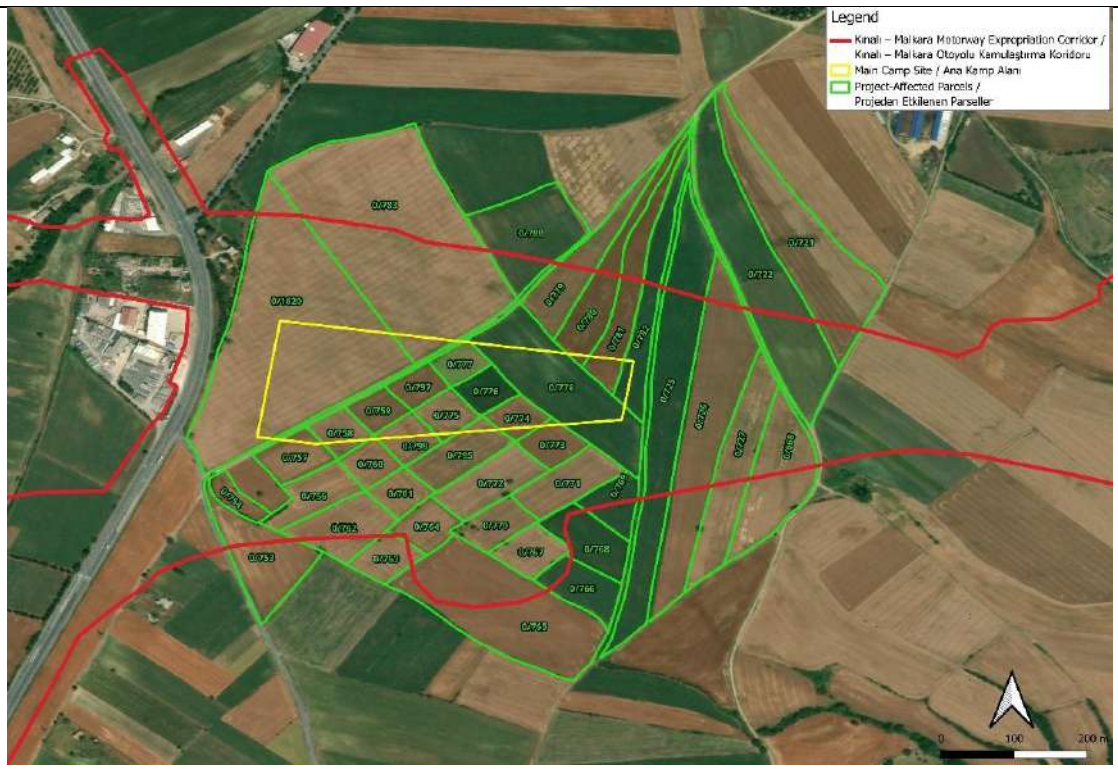
In addition to the construction camp and facility sites currently planned by the SPV and EPC Contractor, there may be additional camp and facility sites proposed by subcontractors engaged in the future phases of the Project. When located outside the expropriation corridor, the land acquisition processes for temporary facilities are carried out as follows:

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

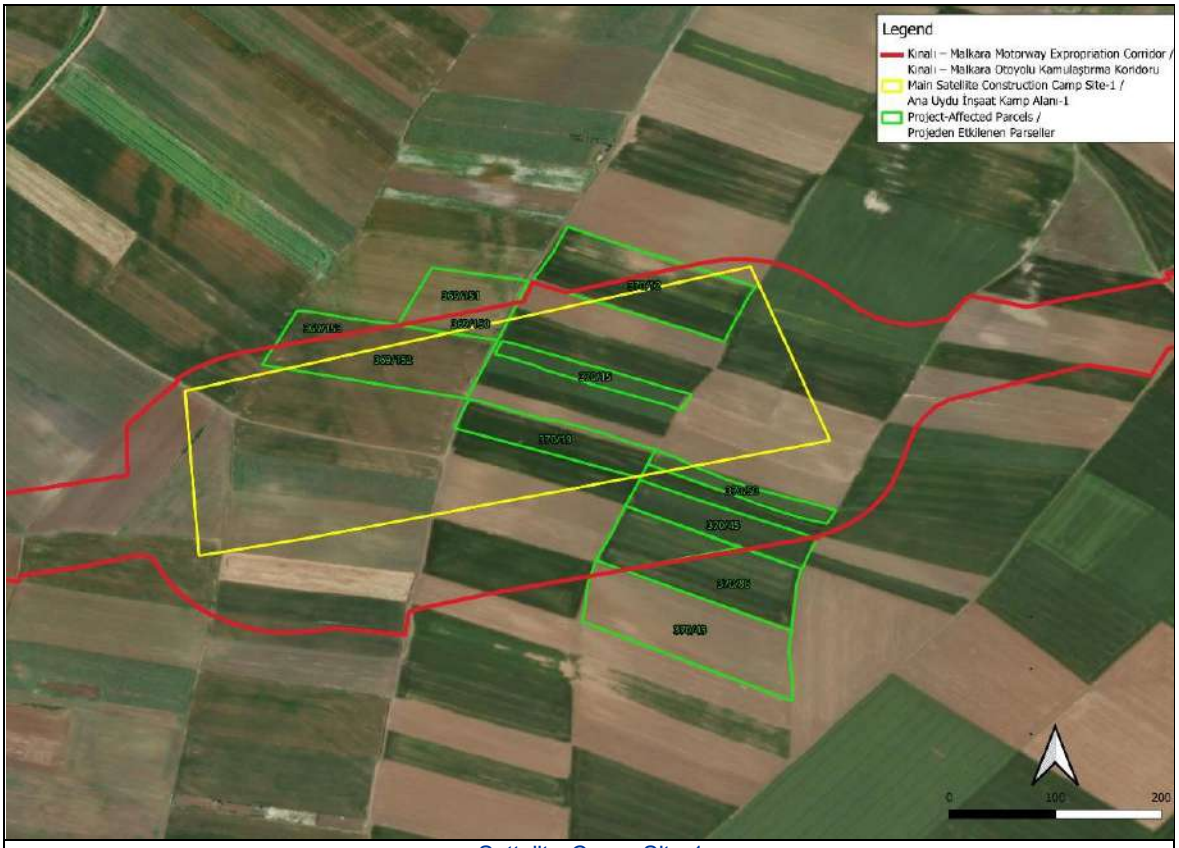
2.3.7.1. Construction Camp Sites

The Project includes **three** construction camp sites, the details of which are presented in Table 2-12.

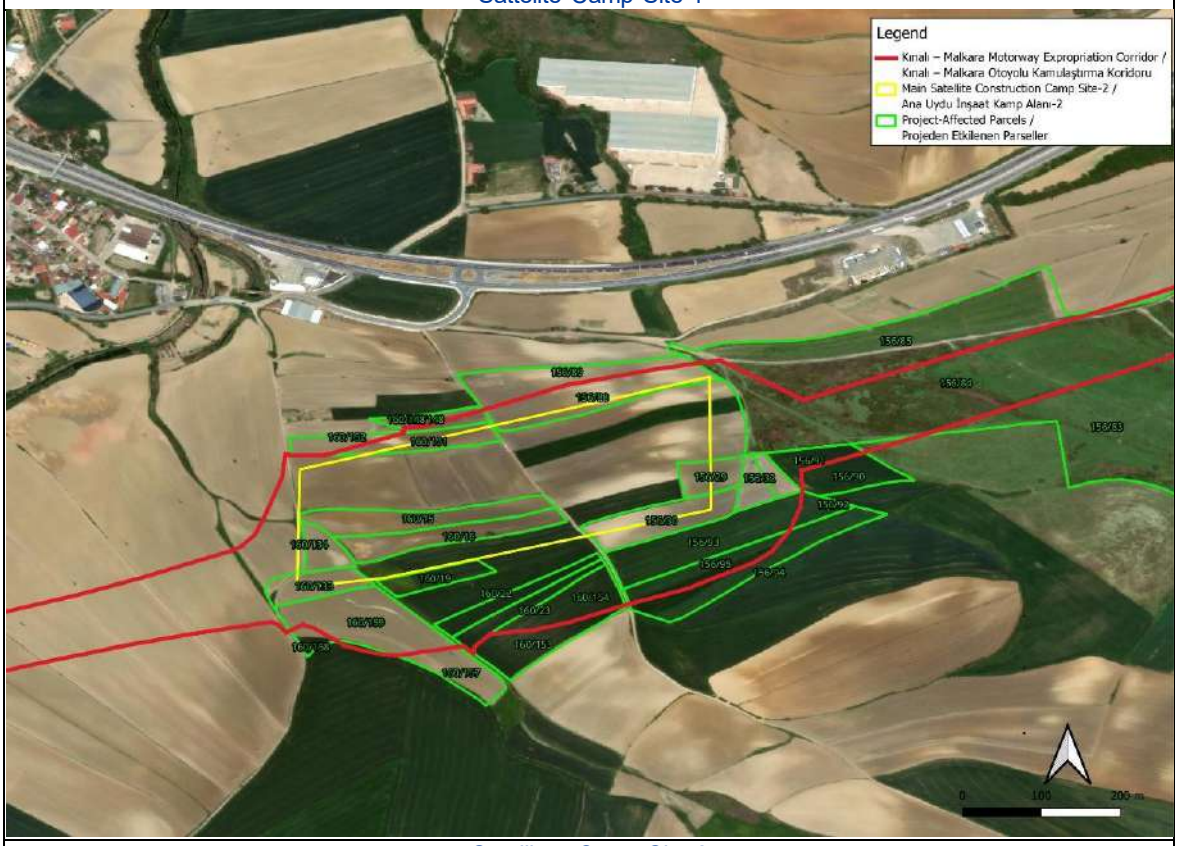
Upon completion of construction activities, Main Construction Camp Site is intended to be repurposed for Operation and Maintenance (O&M) purpose. A layout of the main construction camp site, satellite construction camp site-1 and satellite construction camp site-2 including parcel boundaries and associated facilities, is provided in Figure 2-7. A list of the affected parcels is provided in Table 2-12.



Main Camp Site



Sattelite Camp Site 1



Satelliate Camp Site 2

Figure 2-7. Location of Main and Satellite Camp Sites

Table 2-12. List of Planned Camp Sites

No	Section	Facility Name	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m^2)	Area to be Used within the Parcel (m^2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method and Status Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
1	**Section 2:** KM 35 – 70	Tekirdağ Main Camp Site	Tekirdağ	Süleymanpaşa	Kayı	60+000	Inside	New	No	0/668	Agricultural Land	18,650.00	100,000.00	36 Months	Private	Expropriation Negotiation meetings by KGM was held on 5 – 6 March 2026.	Permit for Non-agricultural Use of Agricultural Land – **To be applied.**	-	The EIA application will be submitted before land entry.
										0/721		33,100.00							
										0/722		36,150.00							
										0/725		36,300.00							
										0/726		36,100.00							
										0/727		18,500.00							
										0/754		3,200.00							
										0/756		8,100.00							
										0/757		6,600.00							
										0/758		4,600.00							
										0/759		4,200.00							
										0/760		4,600.00							
										0/761		4,900.00							
										0/762		10,700.00							
										0/763		5,400.00							
										0/764		5,900.00							
										0/765		37,400.00							
										0/766		7,750.00							
										0/767		5,985.00							
										0/768		9,100.00							
										0/769		6,000.00							
										0/770		6,200.00							
										0/771		9,500.00							
										0/772		10,200.00							
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										0/774		4,100.00							
										0/775		4,800.00							
										0/776		4,500.00							
										0/777		4,000.00							
										0/778		27,500.00							
										0/779		12,800.00							
										0/780		12,700.00							
										0/781		12,900.00							
										0/782		12,700.00							
										0/783		75,500.00							
										0/788		18,400.00							
										0/795		9,300.00							
										0/797		4,100.00							
										0/798		5,000.00							
										0/1620		77,487.56							
2	**Section 1:** KM 0 – 35	Kınalı Satellite Construction Camp Site-1	İstanbul	Silivri	Değirmenköy	16+000	Inside	New	No	370/50	Agricultural Land	3,237.27	246,500.00	36 Months	Private	Expropriation Negotiation meeting by KGM was held on 18,19 and 20 March 2026.	Permit for Non-agricultural Use of Agricultural Land – **To be applied.**	-	The EIA application will be submitted before land entry.
										370/49		3,438.44							
										370/12		14,431.86							
										370/45		6,876.05							
										370/13		6,598.55							
										370/44		14,018.50							
										370/14		7,939.68							
										370/43		16,340.76							
										370/15		3,760.35							
										370/16		3,425.03							
										370/17		2,846.28							
										370/18		4,449.14							
										370/19		7,224.45							
										370/20		7,032.44							
										370/21		6,576.33							
										369/67		7,317.09							
										369/22		8,831.35							
										369/23		7,646.93							
										369/24		3,132.66							
										369/25		3,664.88							
										369/68		14,744.89							
										369/76		14,876.38							
										369/77		7,190.45							

No	Section	Facility Name	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m^2)	Area to be Used within the Parcel (m^2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method and Status Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
										369/78		7,979.71							
										369/79		14,602.42							
										369/90		14,530.82							
										369/91		6,759.04							
										369/92		7,496.98							
										369/93		6,270.10							
										369/73		7,263.36							
										369/74		6,927.97							
										369/80		9,608.22							
										369/75		13,990.35							
										369/81		13,975.33							
										369/82		30,572.40							
										369/83		15,209.22							
										369/84		14,536.88							
										369/85		15,735.32							
3	**Section 3:** KM 70 – 105	Malkara Satellite Construction Camp Site-2	Tekirdağ	Süleymanpaşa	Inecik	83+500	Inside	New	**Yes** (156/22, 156/23, 156/24, 156/25, 156/26, 160/9, 160/10, 160/11, 160/12, 160/13, 160/14, 160/15)	156/20	Pasture	166,450.99	246,500.00	36 Months	State	Change of allocation	**The permitting process is ongoing.**	-	The EIA application will be done.
										156/22	Agricultural Land	22,111.59			Private	Expropriation (**The process is completed**)	Permit for Non-agricultural Use of Agricultural Land – The permit was **obtained** on 10 December 2025.	The permit valid until 10 December 2027.	
										156/23		8,821.55							
										156/24		8,378.10							
										156/25		8,731.77							
										156/26		7,692.14							
										156/27		5,356.89							
										156/28		4,931.51							
										156/29		4,251.76							
										156/30		9,641.81							
										156/31		2,728.09							
										156/32		1,831.11							
										156/33		9,514.19							
										156/37		16,950.80							
										156/38		17,022.28							
										160/9		2,310.61							
										160/11		8,551.30							
										160/14		14,411.31							
										160/15		10,024.18							
										160/16		8,987.65							
										160/17		8,949.73							
										160/18		3,228.36							
										160/19		3,877.98							
										160/20		4,889.64							
										160/21		4,412.94							
										160/22		4,611.16							
										160/23		4,342.77							
										160/24		15,063.75							
										160/90		18.430,59							
										160/91		15.972,45							
										160/132		21,502.10							
										160/133		5,191.88							
										160/134		3,482.47							

Source: SPV, March 2026

2.3.7.2. Quarries

The quarries and borrow pits alternatives identified by the SPV for supplying materials required for construction works are listed in Table 2-13.

Table 2-13. List of Planned Quarries and Borrow Pits

No	Name of the Quarry/Borrow Pits	Province	District	Settlement	KM	Location (Outside or Inside the Exp Corridor)	New Facility or Existing Facility	Currently Entered by the Project	Description of Use Prior to Project (if there is any)	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Raw Material Production Permit Status and EIA Decision (as declared by the Company)
Borrow Pits																		
1	Çanta 1-2	İstanbul	Silivri	Çeltik	5+250	Outside	New	**No**	No use	202/1	Forest	2.707.287,68	99,200.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 8 July 2024. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
													99,600.00			Allocation through forestry permit		Raw Material Production Permit **obtained** on 20 August 2024. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
2	Gümüşyaka 1-2-3	İstanbul	Silivri	Gümüşyaka	17+500	Outside	New	**No**	No use	7232/72	Pasture	334.335,52	334,335.52	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 22 July 2025. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
										7232/52	Pasture	145.298,58	145,298.58			Change of allocation	Land use permit applications **will be done.**	
3	Türkgücü 1-2-3	Tekirdağ	Çorlu	Türkgücü	32+300	Outside	New	**No**	No use	0/3920	Pasture	840.070,05	840,070.05	36 Month	State (Ministry of Agriculture and Forestry)	Change of allocation	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 19 January 2026. EIA application was done to obtain relevant EIA Decision. The process is **ongoing**.
										0/3823	Pasture	679.717,12	679,717.12			Change of allocation	Land use permit applications **will be done.**	
4	Akçahalil 1-2-3	Tekirdağ	Süleymanpaşa	Akçahalil	91+219	Outside	New	**No**	No use	101/1	Forest	5.737.820,40	99,400.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	The permitting process is **ongoing.**	Raw Material Production Permit **obtained** on 31 July 2024. EIA Not Required Decision was **obtained** on 11 February 2026.
													99,400.00		State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 31 July 2024. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
													99,400.00		State (Ministry of Agriculture and Forestry)	Allocation through forestry permit		

No	Name of the Quarry/Borrow Pits	Province	District	Settlement	KM	Location (Outside or Inside the Exp Corridor)	New Facility or Existing Facility	Currently Entered by the Project	Description of Use Prior to Project (if there is any)	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m2)	Area to be Used within the Parcel (m2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Raw Material Production Permit Status and EIA Decision (as declared by the Company)
Quarries																		
5	Danamandıra 1-2 Limestone Quarry	İstanbul	Çatalca	Gümüşpınar	5+250	Outside	New	No	No use	183/1	Forest	36.074.720,37	133,900.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 19 August 2024. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
			Silivri	Danamandira						126/1	Forest	37.031.754,23	99,600.00					
6	Dereköy Basalt / Limestone Quarry	Tekirdağ	Malkara	Yenice	60+500	Outside	New	No	No use	157/1	Forest	876,400.00	206,700.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	Land use permit applications **will be done.**	Raw Material Production Permit **obtained** on 28 June 2024. EIA application was done to obtain relevant EIA Decision. The process is **ongoing.**
										102/4	Forest							
7	Tepeköy Limestone Quarry 1-2	Tekirdağ	Şarköy	Tepeköy	105+147	Outside	Former	No	Quarry	371/1	Forest	4.601.117,06	248,800.00	36 Month	State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	The forestry permit was **obtained** on 6 May 2025.	Raw Material Production Permit **obtained** on 19 August 2023. EIA Positive Decision was **obtained** on 15 April 2022.
							New		No use				241,800.00		State (Ministry of Agriculture and Forestry)	Allocation through forestry permit	The permitting process is **ongoing.**	Raw Material Production Permit **obtained** on 25 March 2024. EIA Not Required Decision was **obtained** on 28 August 2025.

Source: SPV, March 2026.

2.3.7.3. Plants and Facilities

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

Table 2-14. List of Planned Plants and Facilities

No	Section	Facility Name	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m^2)	Area to be Used within the Parcel (m^2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method and Status Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
1	**Section 2:** KM 35 – 70	Concrete Batching Plant	Tekirdağ	Süleymanpaşa	Zafer	60+000	Inside	New	No	346/3	Agricultural Land	8,120.00	100,000.00	36 Months	Private	Expropriation Negotiation meeting by KGM was held on 5 – 6 March 2026.	Permit for Non-agricultural Use of Agricultural Land – **To be applied.**	-	The EIA application will be submitted before land entry.
										346/6		4,160.00							
										346/15		5,000.00							
										346/16		14,040.00							
										347/2		11,547.00							
										347/3		14,064.00							
										347/4		10,588.00							
										347/5		5,114.00							
										347/6		4,315.00							
										347/8		5,713.00							
										347/9		3,955.00							
		Precast Girder Production Plant			Kayı					0/1126		5,000.00							
										0/1127		5,300.00							
										0/1444		10,148.78							
										0/1567		9,299.23							
										0/1580		10,057.31							
										0/1630		21,214.27							
2	**Section 1:** KM 0 – 35	Concrete Batching Plant	İstanbul	Silivri	Değirmenköy	16+000	Inside	New	No	370/50	Agricultural Land	3,237.27	246,500.00	36 Months	Private	Expropriation Negotiation meeting by KGM was held on 18,19 and 20 March 2026.	Permit for Non-agricultural Use of Agricultural Land – **To be applied.**	-	The EIA application will be submitted before land entry.
										370/49		3,438.44							
										370/12		14,431.86							
										370/45		6,876.05							
										370/13		6,598.55							
										370/44		14,018.50							
										370/14		7,939.68							
										370/43		16,340.76							
		Mechanical Plant-1								370/15		3,760.35							
										370/16		3,425.03							
										370/17		2,846.28							
										370/18		4,449.14							
										370/19		7,224.45							
										370/20		7,032.44							
										370/21		6,576.33							
										369/67		7,317.09							
		Mechanical Plant-2								369/22		8,831.35							
										369/23		7,646.93							
										369/24		3,132.66							
										369/25		3,664.88							
										369/68		14,744.89							
										369/76		14,876.38							
										369/77		7,190.45							
		Asphalt Plant-1								369/78		7,979.71							
										369/79		14,602.42							
										369/90		14,530.82							
										369/91		6,759.04							
										369/92		7,496.98							
										369/93		6,270.10							
										369/73		7,263.36							
		Asphalt Plant-2								369/74		6,927.97							
										369/80		9,608.22							
										369/75		13,990.35							
										369/81		13,975.33							
										369/82		30,572.40							
										369/83		15,209.22							
										369/84		14,536.88							
										369/85		15,735.32							

No	Section	Facility Name	Province	District	Settlement	Motorway KM	Location (Outside or Inside the Exp. Corridor)	Is it a New Facility or an Existing or Former Facility	Is the Parcel Currently Entered by the Project?	Parcel No.	Land Registry Type of the Parcel	Area of the Parcel (m^2)	Area to be Used within the Parcel (m^2)	Planned Duration of Usage by the Project	Ownership (Private or State)	Land Take Method and Status Used by the Project (e.g. Temporary Lease, Purchase, Expropriation, Through Consent in case of Legal Entity, etc.)	Land Use Permit Status (as declared by the Company)	Permit Duration (if applicable)	EIA Decision Status (as declared by the Company)
3	**Section 3:** KM 70 – 105	Concrete Batching Plant	Tekirdağ	Süleymanpaşa	İnecik	83+500	Inside	New	**Yes** (156/22, 156/23, 156/24, 156/25, 156/26, 160/9, 160/10, 160/11, 160/12, 160/13, 160/14, 160/15)	156/20	Pasture	166,450.99	246,500.00	36 Months	State	Change of allocation	The permitting process is **ongoing**.	-	The EIA application will be done.
										156/22	Agricultural Land	22,111.59			Private	Expropriation (The process is **completed**)	Permit for Non-agricultural Use of Agricultural Land – The permit was **obtained** on 10 December 2025.	The permit valid until 10 December 2027.	
										156/23		8,821.55							
										156/24		8,378.10							
										156/25		8,731.77							
		Mechanical Plant-1								156/26		7,692.14							
										156/27		5,356.89							
										156/28		4,931.51							
										156/29		4,251.76							
										156/30		9,641.81							
		Mechanical Plant-2								156/31		2,728.09							
										156/32		1,831.11							
										156/33		9,514.19							
										156/37		16,950.80							
										156/38		17,022.28							
										160/9		2,310.61							
										160/11		8,551.30							
		Asphalt Plant-1								160/14		14,411.31							
										160/15		10,024.18							
										160/16		8,987.65							
										160/17		8,949.73							
										160/18		3,228.36							
										160/19		3,877.98							
										160/20		4,889.64							
										160/21		4,412.94							
		Asphalt Plant-2								160/22		4,611.16							
										160/23		4,342.77							
										160/24		15,063.75							
										160/90		18.430,59							
										160/91		15.972,45							
										160/132		21,502.10							
										160/133		5,191.88							
										160/134		3,482.47							

Source: SPV, March 2026

2.3.8. Associated Facilities

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

> "…*facilities that are* ***not*** *funded as part of the project and that would* ***not*** *have been constructed* ***or*** *expanded if the project did not exist and without which the project would not be viable.*
>
> *Footnote: Associated facilities may include railways, roads, captive power plants or transmission lines, pipelines, utilities, warehouses, and logistics terminals."*

The ESIA Report (March 2025) disclosed by the Project in August 2025 indicates that "*Among others, the main Project facilities to be considered in the ESIA are the following: temporary associated facilities (which will be used only during construction of the Project):*

- Quarries and borrow pits;
- Camp sites and storage areas;
- Crushers, concrete batching plants and asphalt plants; and
- Access roads.

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

2.4. Project Schedule

For the 1915 Çanakkale Motorway and Connection Roads section of the Project, **ÇOK A.Ş.,** as the SPV, was awarded the BOT tender launched in January 2017 by the Directorate General of Highways (KGM), under the Ministry of Transportation and Infrastructure[22].

In March 2017, the **Implementation Contract (BOT Contract)** for the Project was signed between the **KGM** and **ÇOK A.Ş.,** as the **Appointed Company,** and the Project was officially inaugurated on March 18, 2022.

The KM Section is intended to be included within scope of the Project Company's appointment under the Implementation Contract as an additional work to the MC Section. The Project Company and the KGM signed a **MoU** in September 2022.

The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company. The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as 36 months following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date.

For the Kınalı – Malkara Motorway, the **Finance Agreement** for the Project was signed between the SPV and the Lenders on **30 April 2026.** Consequently, construction works have commenced in **Q2 2026** following the financial close under the Finance Agreement[23]. The **construction works** will progress lot by lot, on parcels where the land acquisition process has been completed and land becomes available for the corresponding construction section. The expropriation and construction schedules are agreed between KGM and the SPV, ensuring alignment of timelines and Project implementation.

[22] https://www.1915canakkale.com/hakkinda/projenin-kunyesi
[23] The financial close represents the first utilisation under the finance arrangement.

The expropriation process for the Project **was initiated by KGM in 2024 for Section 3 (KM 70 – 105)** and as of November 2025, expropriation procedures – including court proceedings and the transfer of title deeds to KGM – **have been completed** for Lot **KM 81+360 – 88+300** and in progress for other lots in Section 3.The SPV has commenced construction works in Section 3 in Q2 2026 on parcels where expropriation has already been completed as of the construction start date. The expropriation works for Section 1 (KM 0 – 35) and KM 58 – 60 of Section 2 (KM 35 – 70) **have been initiated in Q1 2026** and are currently progressing as planned.

Table 2-15 below provides a summary of **key milestones** for expropriation, construction, E&S studies and Project finance according to current KGM approved schedule.

The dates given for the expropriation in this table represent the estimated completion dates for the expropriation of the related sections, and it is assumed that the expropriation process will start at least 6 months before the planned construction activities in the respective areas.

Each section is also divided into several lots, defined based on the priorities of specific locations (such as camp site locations) in accordance with the construction sequence, and these are being communicated to KGM to enable them to plan their expropriation studies in parallel with the requirements of the construction schedule. On the other hand, the work programme is arranged in a manner that allows it to be reorganised in terms of resequencing the works depending on the progress of the expropriation.

In case there is a need for the expropriation of land before the completion of RAP studies, necessary measures will be taken by the SPV using the RPF (approved by the Lenders/LESA in December 2025) as a reference, and site deliveries will be achieved by obtaining the consent of landowners for private parcels. Until this RAP is finalised following the review and approval of the Lenders and the LESA, all Project activities within the respective Project section will be implemented in line with the RPF commitments and land entry will occur only after the entitled Project affected persons (PAPs) have been compensated in accordance with the entitlements and measures outlined in the RPF. Upon approval of this RAP and any future updates to incorporate other Project sections (i.e. Section 2: KM 35 – 70), the RAP commitments will supersede those set out in the RPF.

Following the signing of the Finance Agreement, the SPV submitted a revised Project schedule to KGM in May 2026.

Table 2-15. Key Project Schedule Milestones

No	Key Milestones / Tasks	Date
0	**BOT Contract and Design**	
0.1	Execution of the Implementation Contract for 1915 Çanakkale Motorway and Connection Roads (Malkara – Çanakkale Section)	**Mar 2017**
0.2	MoU signed for KM Section	**Sep 2022**
0.3	Groundbreaking Ceremony for KM Section	**Mar 2025**
1	**Expropriation**	
1.1	**Start of inventory of assets and valuation study commenced by appointed Valuation Contractor**	**Apr 2024**
1.1.1	Section 1 – Valuation Report: KM 0 – 35	**Q2 2026**
1.1.2	Section 2 – Valuation Report: KM 35 – 70	Q4 2026
1.1.3	Section 3 – Valuation Report: KM 70 – 105	**2024 – 2025**
1.2	**Start of expropriation procedures by KGM (through Article 8 notifications and negotiation meetings)**	**2024**
1.2.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	**Feb 2026**
1.2.2	Section 2: KM 35 – 70	Q4 2026
1.2.3	Section 3: KM 70 – 105	**2024**
1.3	**Completion of expropriation by KGM:**	
1.3.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	2026-2027
1.3.2	Section 2: KM 35 – 70	Within 2027
1.3.3	Section 3: KM 70 – 105	Q1 2027
2	**E&S Studies and Finance Agreement**	
2.1	Start of ESIA Package studies	**Apr 2022**
2.2	Start of RPF/RAP studies	**Oct 2025**
2.3	RPF Finalisation and Start of RPF Implementation	**Dec 2025**
2.4	ESIA Public Disclosure and Consultation Meetings	**Feb 2026**

No	Key Milestones / Tasks	Date
2.5	Finance Agreement Signing	**30 April 2026**
2.6	Financial Close	Q2 2026
2.7	**RAP Preparation**[24]	**2026**
2.7.1	**RAP for the full Motorway alignment** – incorporating approved expropriation and valuation data for Section 1 (KM 0 – 35), Section 2 (KM 58 – 60) and Section 3 (KM 70 – 105) and the approved expropriation data for Section 2.	June 2026
2.7.2	**Updated RAP** – to incorporate approved expropriation and valuation data, relevant assessments and budget calculation for Section 2.	Q4 2026
2.8	**Start of RAP Implementation**	**Q2 2026**
3	**Construction Works**	
3.1	**Site Mobilisation and Preparation of Construction Camp Site**	
3.1.1	Section 1: Satellite Camp Site	Q2 2027
3.1.2	Section 2: Main Camp Site	Q2 2026
3.1.3	Section 3: Satellite Camp Site	**Feb 2026**
3.2	**Signing Infrastructure Displacement Protocols with the Relevant Authorities**	**Dec 2024** – Q3 2027
3.3	**Start of Infrastructure (Existing) Displacement Works**	
3.3.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	Q3 2026
3.3.2	Section 2: KM 35 – 70	Q3 2027
3.3.3	Section 3: KM 70 – 105	Q3 2026
3.4	**Start of Construction**	
3.4.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	Q3 2026
3.4.2	Section 2: KM 35 – 70	Q2 2027
3.4.3	Section 3: KM 70 – 105	Q2 2026
3.5	**Large and Small Engineering Structures**	
3.5.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	Q3 2026 – Q3 2028
3.5.2	Section 2: KM 35 – 70	Q1 2027 – Q4 2028
3.5.3	Section 3: KM 70 – 105	Q2 2026 – Q2 2028
3.6	**Superstructure Works**	
3.6.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	Q4 2026 – Q4 2028
3.6.2	Section 2: KM 35 – 70	Q4 2027 – Q4 2028
3.6.3	Section 3: KM 70 – 105	Q4 2026 – Q3 2028
3.7	**Completion of Secondary Works (Landscaping, Lighting, Tunnel Electromechanics, Signage, Barriers, Fencing), Intelligent Transportation Systems**	
3.7.1	Section 1: KM 0 – 35 and Section 2: KM 58 – 60	Q3 2026 – Q3 2028
3.7.2	Section 2: KM 35 – 70	Q1 2027 – Q3 2028
3.7.3	Section 3: KM 70 – 105	Q2 2026 – Q3 2028
4.	**Motorway Commissioning**	Q2 2029
5.	**RAP Implementation and Monitoring**	Until the RAP Completion Audit[25]

The SPV, in collaboration with KGM, will continue **RAP implementation for a duration of 36 months**, following the approval of the RAP by the Lenders and the LESA. This period will encompass the entire construction phase and may extend into the initial months of the commissioning and operational phase, if needed.

[24] Once the data for Section 2 becomes fully available in due course, this RAP will be updated. The scope of the update will be decided in consultation with the Lenders and LESA during RAP preparation.

[25] The RAP Completion Audit will be conducted following the completion of the agreed post-implementation RAP monitoring period to confirm that the livelihoods of affected people have been restored, relevant livelihood restoration and monitoring activities ha ve been implemented as per the RAP commitments.

Throughout the implementation period, internal monitoring by the SPV will be conducted on an ongoing basis to ensure regulatory compliance and the timely delivery of entitlements and support measures to affected individuals and communities in line with the RAP.

After the completion of all RAP measures, including post-implementation monitoring, **a RAP Completion Audit will be carried out**. This audit will be undertaken by **independent resettlement consultant(s)**, who will be approved by the Lenders and commissioned by the SPV.

The audit will verify the successful fulfilment of all RAP commitments, with particular emphasis on the restoration of livelihoods for affected persons and households.

2.5. Current Construction Status

On **18 March 2025**, a **groundbreaking ceremony**[26] was held for the Kınalı – Malkara Motorway Project on parcels that were expropriated for the 1915 Çanakkale Motorway and Connection Roads Project.

Apart from the site preparations made for the ceremony and design-related activities – including mapping and drilling operations that were initiated, site mobilisation and construction work for the Project have **not** yet commenced. **Only pre-mobilisation works (e.g soil stripping)**[27] **have started at the Malkara Satellite Construction Camp Site planned at KM 83+500.**

In line with the construction schedule agreed with KGM, site mobilisation for Project construction has commenced in **Q2 2026** in **Section 3 and Section KM 58 – 60** and will progress lot by lot, on parcels where the land acquisition process has been completed – whether through purchase or expropriation for privately owned parcels, or through allocation of state-owned parcels to the Project.

The following procedure will be implemented for construction activities planned to commence after the signing of the finance agreement, in order to ensure compliance with the Lender's requirements."

- To prevent unauthorised land entry prior to the completion of expropriation, a parcel-based **Land Access Permit** form will be used by the SPV. This form will allow the completion status of expropriation to be verified and signed by the authorised SPV and EPC personnel prior to land entry for any construction work, including site mobilisation, topsoil stripping, excavation, and/or embankment (fill) works, and therefore serve as a checkpoint prior to entry.

- The parcel conditions will be documented in land entry protocols to be executed for each parcel prior to physical entry, following the completion of compensation payments as required under the Turkish Expropriation Law and/or in alignment with the RAP.

- No construction activity will commence on a parcel **unless** the expropriation process or an appropriate consent protocol ("*muvafakat*" – including signature from all shareholders of a parcel in case of multiple land ownership) has been completed and all required payments, including crop compensation for formal and informal users, have been made.

- Land exit protocols shall be executed only for land parcels acquired on a temporary basis, documenting the return and restoration of the land to the rightful party.

Land Entry through Consent Protocols

To date, **no parcels have been entered into through consent protocols** (*muvafakat*").

[26] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Projeler/OtoyolProjeleri/KinaliMalkara.aspx

[27] These works were carried out on privately owned parcels for which expropriation, including compensation payments, has been completed. Prior to land entry, there were no crops or structures on these parcels. As the landowners were aware of the expropriation process, they did not undertake any cultivation after the completion of expropriation.

2.6. Current Land Acquisition Status

Land acquisition activities for the Project – including expropriation of privately-owned parcels – began in **2024**.

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

- The **Public Benefit Decision** (No:2022/138) for the Project was declared by the **MoTI** on **6 July 2022.**
- A **Presidential Decree** (Decision Date: 12 April 2023, No. 7060) 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[28] in the Official Gazette (No. 32162) on **13 April 2023** (referred to as **Accelerated Expropriation Decision**).
- The **Expropriation Decisions** were taken for the Project by **KGM for the lots where expropriation has been carried out to date.**

Table 2-16. Status of KGM's Expropriation Decisions for the Project (as of November 2025)

No.	KM	Motorway Section/ Facility	Length (km)	Expropriation Decision Date	Expropriation Decision No.
Main Road					
1	0+167.45 – 6+466.13	Silivri Main Road	6.30	15.09.2025	2025-95
2	6+466.12 – 9+883.93	Silivri Main Road	3.42	15.09.2025	2025-94
3	9+883.93 –11+023.93	Silivri Main Road	1.14	23.09.2025	2025-99
4	11+023.93 –13+192.77	Silivri Main Road	2.17	15.09.2025	2025-94
5	13+224.76 –17+609.29	Silivri Main Road	4.38	23.09.2025	2025-99
6	17+698.81 – 22+208.98	Çorlu-Marmaraereğlisi Main Road	4.51	1.08.2025	2025-69
7	22+208.98 – 29+057.48	Çorlu-Marmaraereğlisi Main Road	6.85	1.08.2025	2025-67
8	29+057.48 – 35+302.43	Çorlu-Marmaraereğlisi Main Road	6.24	1.08.2025	2025-68
9	71+658.59 –78+279.02	Süleymanpaşa Main Road	6.62	27.12.2024	2024-88
10	78+279.03 – 88+484.19	Süleymanpaşa Main Road	10.21	27.12.2024	2024-90
11	88+484.18 – 94+944.26	Süleymanpaşa Main Road	6.46	27.12.2024	2024-89
12	94+944.26 –104+885.47	Süleymanpaşa Main Road	9.94	27.12.2024	2024-91
Connection Roads					
1a	0+000.00 – 0+658.34	K-2 Silivri Connection Road	0.66	15.09.2025	2025-95
2a	0+461.58 –1+638.08	K-3 Connection Road	1.18	15.09.2025	2025-94
2a	0+070.33 –1+343.07	State Road	1.27	15.09.2025	2025-94
3a	0+214.5 –1+198.58	K-3 State Road	0.98	23.09.2025	2025-99
6a	0+000.00 –1+672.24	K-4 Connection Road	1.67	1.08.2025	2025-69
6a	2+258.81 – 4+927.08	K-5 Connection Road	2.67	1.08.2025	2025-69
6a	2+550.00 –4+730.00	K-4 State Road	2.18	1.08.2025	2025-69
7a	0+175.63 – 2+258.83	K-5 Connection Road	2.08	1.08.2025	2025-67
9a	0+000.00 –1+463.99	Kol-1 Road	1.46	27.12.2024	2024-88
9a	0+000.00 – 0+919.00	Kol-1 Connection Road	0.92	27.12.2024	2024-88
9a	0+000.00 – 0+739.17	Kol-2 Road	0.74	27.12.2024	2024-88
9a	0+044.86 –1+898.03	D-110 State Road	1.85	27.12.2024	2024-88

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

[28] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

As part of this process, field identification works are undertaken to prepare detailed inventory of assets for each affected parcel as part of the expropriation plans. Subsequently, structure valuation forms and valuation reports are prepared in a progressive manner along the route, based on the identified assets. For the sections where valuation reports have been approved by **KGM – KÖSOB**, **the land acquisition process commences** for private, public, and legal entity-owned parcels, including the Article 8 invitations sent to affected owners by KGM. Accordingly, expropriation works proceed lot by lot, depending on the completion of the valuation reports for respective parcels and subject to the availability of KGM's expropriation budget.

Status of the expropriation plans, structure valuation forms and valuation reports prepared by the valuation contractor for the full alignment is summarised in Table 2-17.

Table 2-17. Status of Inventory of Assets, Valuation Studies and Article 8 Negotiations along the Route (as of mid July 2026)

Expropriation and Valuation Documentation	**Section 1** KM 0 – 35	**Section 2** KM 35 – 70[29]	**Section 3** KM 70 – 105
Expropriation Plans and Lists approved by relevant Cadastral Office	**Completed**	**Completed** [30]	**Completed**
Field Identification Works – Inventory of Assets	**Completed**	**Completed for KM 58 – 60** To be prepared for the remainder	**Completed**
Structure Valuation Forms	**Completed**	**Completed for KM 58 – 60** To be prepared for the remainder	**Completed**
Valuation Reports (approved by KGM)	**Completed**	**Completed for KM 58 – 60** To be prepared for the remainder	**Completed**
Article 8 Negotiation Meetings	**In progress**	**In progress**[31] **for KM 58 – 60** Not started yet for the remainder	**Completed**
Article 27 court process	None	None	None
Article 10 court process	Not started yet	**Ongoing for KGM 58 – 60**	**Ongoing**[32]

Source: SPV, July 2026.

[29] The SPV anticipates that the approved expropriation plans, structure valuation forms, and valuation reports for this section will be completed within **Q4 2026.** This will be followed by Article 8 notifications by KGM, marking the start of the expropriation process for this section. The process will proceed entirely within the budget framework of the KGM Directorate General and KÖSOB.

[30] The expropriation plans were submitted to the relevant Cadastral Office for approval in November 2025. As there were deficiencies in the cadastral subdivision records and digital data at the cadastral offices in this relatively urbanised area, the approval process took longer than in the other sections. The approval process has been completed in May **2026** (excluding Gazioğlu neighbourhood, where the data deficiencies have not yet been resolved).

[31] Article 8 negotiations in **Section 2** have commenced in **March 2026** for the parcels corresponding to the Main Construction Camp Site (future O&M Centre) location at **KM 58 – 60**. The process will proceed in other parts of this Section following the approval of the expropriation plans and completion of the valuation process.

[32] The Article 10 court cases filed in 2025 had been dismissed by the end of the year, to KGM's knowledge. The dismissed cases were re filed by KGM in January – February 2026. These cases are expected to be completely finalised – including the deregistration decisions ("*terkin kararı*") within **Q2 2026**.

2.6.1. Privately-owned Parcels

Expropriation of privately-owned parcels is carried out by **KGM – KÖSOB** in accordance with the Expropriation Law (No. 2942) of Türkiye. For the Project, **expropriation works were initiated by KGM – KÖSOB in Section 3 (KM 70 – 105) in 2024.**

In this Project, KGM – KÖSOB has prioritised negotiated settlements through the **Article 8** process (purchasing method) under the Expropriation Law. Accordingly, KGM – KÖSOB invites all owners and shareholders, including heirs[33], to participate in Article 8 negotiations.

Based on the Presidential Accelerated Expropriation Decision issued for the Project, KGM – KÖSOB has the authority to initiate accelerate expropriation court proceedings (**Article 27**) in line with the construction schedule and subject to the availability of the expropriation budget for compensating right holders. **However**, considering the construction schedule of the Project, **Article 10** was implemented in cases where Article 8 agreement protocols could not be signed with the right holders and **Article 27 was not applied by KGM – KÖSOB to date**.

Table 2-18 provides the **expropriation status** of private and legal entity parcels based on the data obtained from KGM's KÖSOB. The negotiated settlement rate under Article 8 in **Section 3** is comparatively lower than that achieved in **Section 1** to date. Based on the assessment provided by KGM – KÖSOB, the difference between Sections 1 and 3 primarily reflects differences in landowner profiles, local dynamics and landowners' approaches to the expropriation process.

In Section 3, at the time the negotiation meetings commenced, awareness of the Project and expropriation process was relatively limited and landowners were more frequently represented and advised collectively by lawyers, which limited direct engagement between KGM - KÖSOB and individual landowners and contributed to a greater preference for pursuing the judicial expropriation process under Article 10. In contrast, direct engagement with landowners was more prevalent in Section 1, where PAPs were better informed about the Project and the expropriation process, while lawyers accordingly played a less active role. As a result, landowners generally engaged with the process individually. This engagement was further strengthened by the engagement and information disclosure efforts undertaken by the SPV in coordination with the KGM – KÖSOB as part of the ESIA and RAP processes, including the ESIA Public Disclosure and Consultation Meetings held by the SPV in February 2026. In addition, prevailing economic conditions and landowners' expectations regarding timely access to compensation appear to have increased the willingness of affected landowners in Section 1 to conclude negotiated settlements under Article 8. Differences in the nature of land ownership and attachment to the affected land are also believed to have influenced the agreement rates. A greater proportion of the affected properties in Section 1, particularly in areas closer to Istanbul, were understood to be held for investment purposes, with comparatively limited reliance on or personal attachment to the land and a stronger preference for prompt cash settlement, consistent with prevailing macroeconomic conditions (inflation) and an associated need for liquid funds. By contrast, landowners in the more rural settlements of Section 3 generally had stronger long-standing social, family and livelihood-related ties to their properties and were therefore less inclined to relinquish their land through negotiated settlement. Accordingly, the lower Article 8 agreement rate in Section 3 is considered to result from the specific socio-economic characteristics of the affected landowners, the extent to which they were legally represented and advised by lawyers to pursue the judicial expropriation process under Article 10 rather than a negotiated settlement under Article 8 and differing levels of attachment to the affected properties.

Similarly, as expropriation activities have commenced in only a very limited, approximately 2 km-long part of **Section 2** to date, it is too early to draw any general conclusions regarding landowners' overall approach to negotiated settlements across the entire section. Nevertheless, based on KGM – KÖSOB's observations within this limited stretch, previous expropriation activities in the area had resulted in affected landowners being generally familiar with the expropriation process and having higher expectations that judicial proceedings under Article 10 would result in higher compensation than negotiated settlements under Article 8. In addition, the affected landowners within this limited stretch were understood to comprise a relatively higher proportion of affluent individuals, many of whom preferred to leave the negotiations entirely to their legal representatives/lawyers without directly considering the offers made by KGM. These factors appear to have influenced the negotiated settlement rate within this specific part of Section 2.

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

Table 2-18. Expropriation Status of Private and Legal Entity Parcels

Ref	Indicator	Number		
		Section 1 KM 0 – 35	Section 2 KM 35 – 70	Section 3 KM 70 –105
Total number of private + legal entity parcels in the Project (2,256 private + 38 legal entity = 2,294 parcels)		**1,076**	**770**	**448**
A	**Number of parcels for which expropriation has started (C + E)**	792	101	454[34]
B	**Number of parcels invited for Article 8 negotiations**	792	101	448
C	**Number of parcels with purchase agreements signed for full shares**	35	13	37
D	**Number of parcels with purchase agreements signed for partial shares**	0	0	0
E	**Number of parcels subject to Article 10 lawsuit**	439	88	417
F	**Number of parcels paid through Article 10 court decision (F.1 + F.2)**	0	46	406
F.1	**Number of parcels with annulment (*terkin*) decisions in place, for which title deeds have been or will be obtained**	0	42	399
F.2	**Number of parcels for which annulment (*terkin*) decision will be issued by the court**	0	4	7
G	**Number of parcels with ongoing court procedures (Article 10)[35]** (before payment)	0	0	5
H	**Number of parcels for which Article 10 court cases have not yet been initiated**	439	42	6

Source: KÖSOB, mid July 2026.

Within the expropriation works of Section 1, Section 2 (KM 58 – 60) and Section 3, Article 8 negotiations were conducted on the basis of up-to-date valuation studies, immediately after (less than 3 months) the valuation reports are prepared and approved by KGM.

To identify the owners/shareholders eligible to sign agreement protocols during Article 8 negotiation meetings and to proceed with the purchase transactions in line with Article 8 of the Expropriation Law, KGM, with support from SPV personnel, obtains the updated land registry records from Land Registry and Cadastre Information System of Türkiye (TAKBIS) and identifies owners/shareholders eligible for proceeding with sale transaction by taking into account annotations such as mortgages, liens, and precautionary measures that may be an obstacle to the transaction in case of Article 8 agreement. According to KÖSOB, information on identified heirs is obtained from the Population and Citizenship Affairs System and Article 8 notifications are issued by KÖSOB.

The **schedule of expropriation** is presented in Figure 2-8.

In future, **valuation rates** for land and assets will be updated by KGM **at least annually**. If needed, **Article 27** will be used by KGM – KÖSOB as a last resort, only after Article 8 negotiations and consultations with the rightful owners and shareholders have been held and failed **or** if they do not attend the reconciliation negotiations despite the consultation efforts made **or** there are obstacles that may constitute legal barriers to negotiated settlement or hinder the finalisation of agreements. Such obstacles may include annotations on the title deeds of the immovable property subject to expropriation (such as mortgages, liens, or enforcement orders), unresolved inheritance transfers, or ongoing court proceedings concerning the property (including cadastral boundary or area correction cases, title cancellation and registration cases, and guardianship cases).

[34] In Section 3, there are 438 private parcels and 10 legal entity parcels, totalling 448 parcels. As indicated under Item (B), KGM invited the owners of 448 parcels to Article 8 negotiations, omitting 1 parcel (originally included in the expropriation plans) because it may be excluded from expropriation through avoidance measures. In addition to these 448 parcels, KGM has initiated expropriation procedures for 5 additional parcels corresponding to electricity transmission line displacement areas. Information on the electricity transmission line displacement works and the associated expropriation requirements is currently being collated by the SPV.

[35] This category includes parcels awaiting an annulment decision, even though Article 10 payments have been deposited by KGM, parcels for which a budget has been requested internally by KÖSOB, or parcels for which the Article 10 expert report has not yet been received.

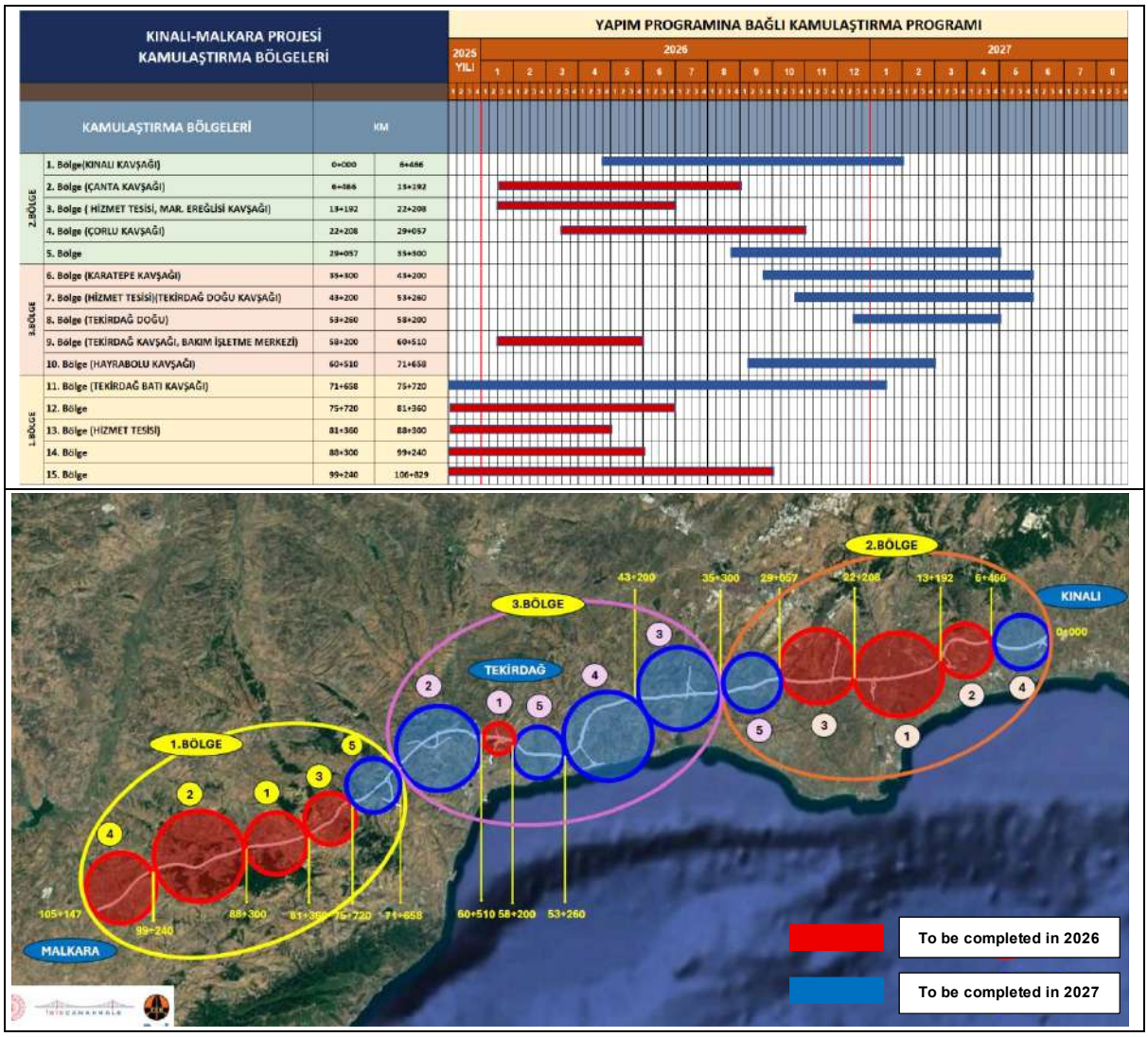


Figure 2-8. Schedule of Expropriation Process

2.6.2. State-owned Parcels

State-owned (public) parcels are allocated to the Project through procedures carried out by KGM - KÖSOB in coordination with the relevant authorities, without requiring payment, as outlined below.

- **Treasury parcels:** Treasury parcels are located across all three sections of the Project.

  KGM – KÖSOB **will** formally request from the Ministry of Environment, Urbanisation and Climate Change, General Directorate of National Real Estate or the Governorates the allocation of Treasury parcels located within the Project's expropriation corridor, as well as those corresponding to temporary facilities situated outside the expropriation corridor (please see Table 2-19 – Category A).

- **Forest parcels:** Forestry parcels are located **only in Section 3** (KM 70 – 105) of the Project.

  For this Section, KGM – KÖSOB completed the forestry permits in December 2025 from the Ministry of Agriculture and Forestry, General Directorate of Forestry, and the relevant District Forestry Operations Directorates (please see Table 2-19 – Category B). The permit is valid until 2074.

- **Pasture parcels:** Pasture parcels are located across all three sections of the Project.

  In the Marmaraereğlisi and Süleymanpaşa districts, these parcels constitute common property. In the Çorlu district, the expropriation plans indicate that the pasture parcels are owned by the district municipality (i.e. Çorlu Municipality, as a legal entity). However, Project representatives have clarified that there is an ongoing legal dispute regarding ownership status and the permitting process for these parcels is under the responsibility of the Tekirdağ Governorate, Provincial Directorate of Agriculture and Forestry.

  Allocation of pasture parcels to the Project requires an application to the Provincial Directorate of Agriculture and a change in their allocation status by the Ministry of Agriculture and Forestry, General Directorate of Plant Production in accordance with the Pasture Law.

  As of September 2026, the allocation process for the pasture parcels in **Section 3 has been completed**. For the allocation of **pasture parcels in Section 1**, KÖSOB has submitted the required applications to the relevant authorities, and the permitting process for the corresponding parcels **will be completed in due course** in alignment with the construction schedule.

- **Non-registered parcels ("*tescil harici*")**: When cadastral surveying is carried out in adjacent areas ('*mücavir alan*') that have not previously undergone cadastral registration, the relevant Land Registry and Cadastre Directorates carrying out the survey record areas in common use, and used by the public, such as streams, roads, rocky ground, stony ground, etc., as non-registered, under the designation of common use, and keep them outside registration. These areas are generally considered unsuitable for use.

  These parcels are under the ownership and control of the State and are not subject to expropriation procedures under the Expropriation Law. KÖSOB will submit a formal application to the Ministry of Environment, Urbanisation and Climate Change, General Directorate of National Real Estate, to ensure the allocation of the non-registered parcels across the full alignment to KGM for use within the scope of the Project.

These state-owned (public) parcels will only be accessed by the SPV and/or EPC Contractor for Project purposes **once the allocation process by the relevant institutions is completed** in accordance with the applicable national legislation, and the right of use is formally granted to KGM.

The **acquisition status of these state-owned (public) parcels** within Motorway's expropriation corridor is summarised below in Table 2-19 according to their land entry (impact) status.

The acquisition status of state-owned parcels that overlap with the **temporary facility sites** is presented in Section 2.3.7.

Table 2-19. Acquisition Status of State-owned Parcels within the Expropriation Corridor (as of March 2026)

Category	Acquisition Method	Section	Total Number of Parcels	Status of Land Entry	Permitting Status
(A) Treasury (excluding in forestry parcels)	Allocation	Section 1 (KM 0 – 35)	27	Not entered yet	To be completed **prior to land entry**
		Section 2 (KM 35 – 70)	8	Not entered yet	To be completed **prior to land entry**
		Section 3 (70 – 105)	20	Not entered yet	To be completed **prior to land entry**
	Total		**55**		
(B) Forestry (including in treasury and non-registered ownership)	Forestry permit	Section 1 (KM 0 – 35)	0	Not applicable	Not applicable
		Section 2 (KM 35 – 70)	0	Not applicable	Not applicable
		Section 3 (70 – 105)	27	Not entered yet	**Obtained**
	Total		**27**		
(C.1) Pasture-					
Common Property	Change of allocation	Section 1 (KM 0 – 35)	2	Not entered yet	To be completed **prior to land entry**
		Section 2 (KM 35 – 70)	1	Not entered yet	To be completed **prior to land entry**
		Section 3 (70 – 105)	6	Entered	Completed
Legal Entity (Çorlu Mun.)		Section 1 (KM 0 – 35)	2	Not entered yet	To be completed **prior to land entry**
Private		Section 2 (KM 35 – 70)	2	Not entered yet	To be completed **prior to land entry**
	Total		**13**		
(D) Non-registered (excluding in forestry parcel)	Allocation	Section 1 (KM 0 – 35)	15	Not entered yet	To be completed **prior to land entry**
		Section 2 (KM 35 – 70)	32	Not entered yet	To be completed **prior to land entry**
		Section 3 (70 – 105)	17	Not entered yet	To be completed **prior to land entry**
	Total		**64**		
(E) Road	Allocation	Section 1 (KM 0 – 35)	**85**	Not entered yet	To be completed **prior to land entry**
	Allocation	Section 2 (KM 35 – 70)	**66**	Not entered yet	To be completed **prior to land entry**
	Allocation	Section 3 (70 – 105)	**42**	Not entered yet	To be completed **prior to land entry**
	Total		**193**		
Total – State-owned			**352**		

Source: SPV, March 2026

Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*

2.6.3. Legal Entity Parcels

Parcels owned by legal entities are subject either to expropriation, in accordance with the provisions of the Expropriation Law, if the entity is a private foundation or a cooperative, or to allocation to the Project for the exercise of use rights if the immovable is registered to a public legal entity or enterprise.

The legal entities that own parcels within the Motorway's expropriation corridor, as identified in the Expropriation Plans, are listed in Table 2-20.

Table 2-20. Legal Entities with Parcels within the Motorway Expropriation Corridor

Municipalities	Other Public Legal Entities or Enterprises	Private Foundation, Cooperative, etc.
- Marmaraereğlisi District Municipality - Çorlu District Municipality - Süleymanpaşa District Municipality - Malkara District Municipality	- General Directorate of Turkish State Railways (TCDD)* - The Rectorate of Tekirdağ Namık Kemal University* - Turkish Electricity Distribution Cooperation (TEDAŞ) - Turkish Electricity Transmission Corporation (TEİAŞ) - Türkiye Electricity Foundation (TEK) *	- AK-EL Education Culture Health Foundation (*"Ak-El-Eğitim Kültür Sağlık Vakfı"*) - Limited Liability Tekirdağ Shopping Center Collective Workplace Construction Cooperative* - Süleymanpaşa Municipality Tourism, Agriculture, Livestock and Construction Joint Stock Company - Tokat Province Zile District Yalinyazi Town Culture Assistance and Solidarity Association *("Tokat İli Zile İlçesi Yalinyazi Beldesi Kültür Yardımlaşma ve Dayanışma Derneği")* - Turkish Armed Forces Mehmetçik Foundation

Source: SPV, March 2026. Expropriation Plans.

(*) The institutions listed under Section 2 are based on the current version of the expropriation plans and may change following the completion of cadastral approval and valuation.

In order to facilitate land entry prior to the completion of expropriation procedures, KGM officially notified the legal entities holding assets within the Expropriation Corridor about the Accelerated Expropriation Decision and requested that these institutions provide their consent regarding the use of the parcels under their ownership.

The land acquisition status of the legal entities is summarised in Table 2-21.

Table 2-21. Legal Entities with Parcels within the Motorway Expropriation Corridor and their Land Acquisition Status (April 2026)

Section	Province	District	Neighbourhood	Number of Legal Entity Parcels	Name of the Entities	Status of Land Acquisition Status
Section 1 (KM 0-35)	İstanbul	Silivri	Alipaşa	2	• AK-EL Education Culture Health Foundation *("Ak-El-Eğitim Kültür Sağlık Vakfı")*	Expropriation **will be** completed in due course.
					• Turkish Electricity Transmission Corporation (*TEİAŞ*)	The ownership rights **will be** allocated to the Project for use.
			Balaban	1	• Tokat Province Zile District Yalinyazi Town Culture Assistance and Solidarity Association *("Tokat İli Zile İlçesi Yalinyazi Beldesi Kültür Yardımlaşma ve Dayanışma Derneği")*	Expropriation **will be** completed in due course.
	Tekirdağ	Marmaraereğlisi	Yakuplu	3	• Marmaraereğlisi District Municipality	The ownership rights **will be** allocated to the Project for use.
					• Turkish Armed Forces Mehmetçik Foundation *("Türk Silahli Kuvvetleri Mehmetçik Vakfi")*	Expropriation **will be** completed in due course.
			Seymen	2	• Çorlu District Municipality	The ownership rights **will be** allocated to the Project for use.
Sub-total KM 0-35				**8**		

Section	Province	District	Neighbour hood	Number of Legal Entity Parcels	Name of the Entities	Status of Land Acquisition Status
Section 2 (KM 35-70)	Tekirdağ	Süleyman paşa	Gazioğlu	7	• Türkiye Electricity Foundation (TEK)	The ownership rights **will be** allocated to the Project for use.
					• Turkish Electricity Distribution Cooperation (*TEDAŞ*)	The ownership rights **will be** allocated to the Project for use.
					• Süleymanpaşa Municipality Tourism, Agriculture, Livestock and Construction A.Ş.	Expropriation **will be** completed in due course.
					• Limited Liability Tekirdağ Shopping Center Collective Workplace Construction Cooperative	Expropriation **will be** completed in due course.
			Köseilyas	1	• The Rectorate of Tekirdağ Namık Kemal University	The ownership rights **will be** allocated to the Project for use.
			Kayı	2	• Süleymanpaşa District Municipality	The ownership rights **will be** allocated to the Project for use.
					• Turkish Electricity Distribution Cooperation (*TEDAŞ*)	The ownership rights **will be** allocated to the Project for use.
			Gündoğdu	4	• Turkish Electricity Transmission Corporation (*TEİAŞ*)	The ownership rights **will be** allocated to the Project for use.
					• Türkiye Electricity Foundation (*TEK*)	The ownership rights **will be** allocated to the Project for use.
			Aydoğdu	2	• General Directorate of Turkish State Railways (*TCDD*)	The ownership rights **will be** allocated to the Project for use.
			Zafer	4	• General Directorate of Turkish State Railways (*TCDD*)	The ownership rights **will be** allocated to the Project for use.
Sub-total KM 35-70				**20**		
Section 2 (KM 70-105)	Tekirdağ	Süleyman paşa	Seymenli	4	• Süleymanpaşa Municipality Tourism, Agriculture, Livestock and Construction A.Ş.	Expropriation **will be** completed in due course.
					• Turkish Electricity Distribution Cooperation (*TEDAŞ*)	The ownership rights **will be** allocated to the Project for use.
			Güveçli	2	• Turkish Electricity Transmission Corporation (*TEİAŞ*)	The ownership rights **will be** allocated to the Project for use.
			İnecik	2	• Süleymanpaşa Municipality Tourism, Agriculture, Livestock and Construction A.Ş.	Expropriation **will be** completed in due course.
			Akçahalil	1	• Turkish Electricity Distribution Cooperation (*TEDAŞ*)	The ownership rights **will be** allocated to the Project for use.
		Malkara	Yenice	1	• Malkara District Municipality	The ownership rights **will be** allocated to the Project for use.
Sub-total KM 70-105				**10**		
Total				**38**		

2.6.4. Court Cases as per Expropriation Law

The expropriation status of the privately-owned parcels is provided in Section 2.6.1.

Even though the Project has an **Accelerated Expropriation Decision** issued by the President of Türkiye (Presidential Decree No. 7060, Date: 12 April 2023) and published in the Official Gazette[36] (No. 32162) on **13 April 2023**, considering the construction schedule of the Project, **Article 10** was implemented in cases where Article 8 agreement protocols could not be signed with the right holders and **Article 27 was not applied by KGM – KÖSOB to date**.

Section 2.6.1 – Table 2-18 provides the expropriation status of private and legal entity parcels based on the data obtained from KGM's KÖSOB, including the number of parcels for which an Article 10 lawsuit has been filed and number of parcels paid through Article 10 court decision. Table 2-22 further provides the status of Article 10 court cases.

The summary of the status of court cases is as follows, as of July 2026:

- **Section 1 (KM 0 – 35):** To date, **no Article 27** cases have been filed by KGM – KÖSOB. **Article 10** lawsuits are to be filed by KGM – KÖSOB for parcels where no agreement has been reached. Parcels where no agreement has been reached will be referred **to KGM's legal unit for filing Article 10 court cases.**
- **Section 2 (KM 35 – 70):** To date, **no Article 27** cases have been filed by KGM – KÖSOB. **Article 10** lawsuits have been filed by KGM – KÖSOB for parcels where no agreement has been reached and court-appointed expert reports are currently being awaited under Article 10. The process is ongoing.
- **Section 3 (KM 70 – 105):** To date, **no Article 27** cases have been filed by KGM – KÖSOB. Article 10 court cases were filed by KGM – KÖSOB for parcels where no agreement has been reached and the procedures by KGM – KÖSOB have been completed (with annual decision issued or expropriation fee deposited and annulment decision is imminent) for a vast majority (over 99%) of parcels for which Article 10 lawsuits have been filed).

Table 2-22. Status of Article 10 Court Cases (as of July 2026)

Section	KM Chainage	Total Number of Private and Legal Entity Parcels in the Section	Total Number of Parcels where Exp. Procedures Initiated	Stage of Article 10 Process					
				Decision Issued	Annulment Decision Not Issued (Blocked)	Payment Request Submitted	Expert Report Not Received	To Be Litigated by Legal Department	To Be Referred to Legal Department
Section 1	6+466 – 13+192	1,068 private 8 legal entity	335						213
	13+192 – 22+208		277						146
	22+208 – 29+057		180						80
Section 2	58+204 – 60+510	747 private 20 legal entity	101	42	4				42
Section 3	71+658 – 75+720	438 private 10 legal entity	89	70	2				1
	75+720 – 81+360		84	75	0				4
	81+360 – 88+300		108	103	1				0
	88+300 – 99+240		97	87	2		1		1
	99+240 – 105+147		76	64	2		4		0
Total		**2,253 private + 38 legal entity**	**1,347**	**441**	**11**	**0**	**5**		**487**

Source: KÖSOB, mid July 2026.

[36] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

2.6.5. Past Land Acquisition by KGM (Section 3)

The land acquisition process for the Project, including expropriation of the privately-owned parcels, was initiated by KGM in 2024 only in **Section 3** of the Project and were carried out in accordance with Türkiye's Expropriation Law No. 2942 of 1983. In Section 3, KGM initiated expropriation procedures for 454 parcels, of which 37 were acquired through negotiated settlements under Article 8, while the remaining 417 parcels were subject to the judicial process under Article 10. Considering the construction schedule of the Project, Article 27 was not applied by KGM. The Article 10 process for the parcels in this Section was largely finalised in 2026.

Pre-mobilisation works (e.g soil stripping)[37] have started only at the İnecik Satellite Camp Site planned at KM 83+500 in **February 2026** and construction works in this Section commenced in **Q2 2026** following the financial close under the Finance Agreement[38], which was signed between the Lenders and the SPV on 30 April 2026. The SPV has started implementing the principles of the **Resettlement Policy Framework (RPF**) following its approval by the Project Lenders and the LESA.

The following assessments have been undertaken and actions implemented to date:

- There are no residential or commercial structures in Section 3. Accordingly, the land acquisition activities undertaken by KGM in this Section did not result in any physical displacement.
- In accordance with the RPF principles, the SPV, in coordination with the EPC Contractor, deferred land entry onto expropriated parcels used for agricultural production until the completion of the harvest in June 2026. Accordingly, land users were not required to vacate the parcels before the harvest, and no damage was caused to standing crops.
- The ESIA Public Disclosure and Consultation Meetings held by the SPV in February 2026 covered the districts of Süleymanpaşa and Malkara in Section 3. The SPV's CLOs subsequently commenced engagement with people affected by Project-related land acquisition (e.g. people owning non-residential structures on expropriated lands) in Section 3 and started providing information on the RAP, compensation principles and entitlement framework, prioritising settlements in line with the construction schedule.

In summary, the past land acquisition activities undertaken by KGM prior to the approval of the RPF did not result in any identified non-compliance with the applicable Project standards, including IFC PS5 and the principles of this RAP. Nevertheless, **the SPV will undertake the following actions to ensure full alignment with, and completion of, the RAP requirements:**

- **In Q3 2026,** the SPV will conduct a Past Land Acquisition Review for Section 3 and undertake a parcel-based review of the parcels affected in Section 3, including PAP database surveys with the formal and informal users of the affected lands. Based on the findings of this review, the SPV will develop parcel-specific RAP compensation and assistance packages, where required, and commence the delivery of applicable entitlements to PAPs, including top-up compensation for depreciation deductions applied to non-residential structures, assistance with the relocation of non-residential structures, vulnerability support, and livelihood restoration and improvement measures.
- Unlike in Section 1, cut-off date announcements were not made in Section 3, as the expropriation process had commenced before the preparation of the RPF and RAP. The SPV will therefore post announcements in the affected settlements in Section 3, in alignment with the construction schedule and priorities (starting from August 2026), to inform affected people that crops cultivated on parcels after the completion of expropriation under Article 8 or Article 10 will not be eligible for additional compensation (i.e. crop payment), as these parcels have been formally allocated to the Project.

[37] These works were carried out on privately owned parcels for which expropriation, including compensation payments, has been completed. Prior to land entry, there were no crops or structures on these parcels. As the landowners were aware of the expropriation process, they did not undertake any cultivation after the completion of expropriation.
[38] The financial close represents the first utilisation under the finance arrangement.

2.7. Zoning Plan Implementation

In accordance with the Zoning Law (Law No: 3194, 1985), the implementation status of parcels within the 1/1,000 zoning plan implementation area is categorised into two groups:

- **Executed Parcels** ("*uygulama görmüş*"): These are parcels where the development readjustment share (*Düzenleme Ortaklık Payı – DOP*) has already been deducted in accordance with the relevant legal provisions.
- **Non-Executed Parcels** ("*uygulama görmemiş*"): These parcels have not yet undergone the deduction of the development readjustment share (*Düzenleme Ortaklık Payı – DOP*). They are pending implementation. The approved Motorway route plans are submitted to the relevant municipalities by KGM – KÖSOB, and the municipalities revise their zoning plans accordingly, taking the approved Motorway route plans into consideration.

  Orphan land resulting from the partial expropriation of affected parcels will be assessed by the relevant authorities, such as municipalities, as part of the implementation of the applicable zoning plans. Accordingly, the implementation of zoning plans by the relevant authorities will be monitored by the SPV in relation to these parcels. In parallel, the owner or shareholder of an affected parcel has the right to submit a formal application to KGM requesting the acquisition of the remaining portion of the partially expropriated parcel. In accordance with the Expropriation Law and KGM's established practice, KGM accepts formal applications from PAPs requesting the expropriation of orphan agricultural land, provided that such applications are submitted within 30 days of notification of the expropriation through negotiated settlement. Not all applications necessarily result in the acquisition of the remaining portion. Where an application is rejected, the landowner retains the right to pursue the matter through the courts. The actions to be taken by the SPV to mitigate potential impacts are described in the Entitlements Matrix presented in Section 7.3.

The list of executed parcels ("*uygulama gormus*") is presented in Table 2-23. The entitlements and the actions to be taken by the SPV to mitigated impacts on orphan parcels

Table 2-23. List of Urban Plots ("*Arsa*") within the Expropriation Corridor

Section	District	Settlement	Lot/Parcel no.	Parcel Type	Title Deed Area (m^2)	Expropriated Area (m^2)	Remaining Area	
							(m^2)	% of Title Deed Area
Section 1 KM 0-35	Silivri	Balaban	225/1	Urban Plot	11,764.73	419.93	11,344.80	96.4%
		Değirmenköy	312/13	Urban Plot	6,787.34	4,177.36	2,609.98	38.5%
			312/14	Urban Plot	3,759.57	3,759.57	0.00	0.0%
			312/12	Urban Plot	4,405.30	1,826.80	2,578.50	58.5%
			312/11	Urban Plot	3,687.87	545.19	3,142.68	85.2%
			213/10	Urban Plot	7,978.33	542.16	7,436.17	93.2%
		Gümüşyaka	7859/9	Urban Plot	30,551.73	1,596.39	28,955.34	94.8%
	Marmara ereğlisi	Yakuplu	207/200	Urban Plot	975.43	280.51	694.92	71.2%
Section 2 KM 35-70	Süleyman paşa	Husunlu	104/36	Urban Plot	34,432.59	3,695.19	30,737.40	89.3%
		Gazioğlu	143/1	Urban Plot	745.95	745.95	0.00	0.0%
			143/2	Urban Plot	1,491.92	1,491.92	0.00	0.0%
			143/8	Urban Plot	605.88	605.88	0.00	0.0%
			143/7	Urban Plot	596.89	596.89	0.00	0.0%
			143/6	Urban Plot	596.89	596.89	0.00	0.0%
			143/5	Urban Plot	596.89	596.89	0.00	0.0%
			114/1	Urban Plot	945.28	945.28	0.00	0.0%
			114/2	Urban Plot	945.28	945.28	0.00	0.0%
			114/3	Urban Plot	945.28	945.28	0.00	0.0%

Section	District	Settlement	Lot/Parcel no.	Parcel Type	Title Deed Area (m^2)	Expropriated Area (m^2)	Remaining Area	
							(m^2)	% of Title Deed Area
			143/3	Urban Plot	596.89	596.89	0.00	0.0%
			143/4	Urban Plot	596.89	596.89	0.00	0.0%
			0/1118	Urban Plot	424.00	306.93	117.07	27.6%
			0/1117	Urban Plot	446.00	244.09	201.91	45.3%
			0/1116	Urban Plot	448.00	203.77	244.23	54.5%
			0/1115	Urban Plot	448.00	193.57	254.43	56.8%
			0/1114	Urban Plot	458.00	183.79	274.21	59.9%
			0/1113	Urban Plot	456.00	184.99	271.01	59.4%
			0/1112	Urban Plot	451.00	170.78	280.22	62.1%
			0/1111	Urban Plot	446.00	166.79	279.21	62.6%
			0/1110	Urban Plot	456.00	155.91	300.09	65.8%
			0/1109	Urban Plot	401.00	153.36	247.64	61.8%
			0/1108	Urban Plot	451.00	146.38	304.62	67.5%
			0/1107	Urban Plot	444.00	141.31	302.69	68.2%
			0/1105	Urban Plot	419.00	125.65	293.35	70.0%
			0/1104	Urban Plot	407.00	121.32	285.68	70.2%
			0/1103	Urban Plot	430.00	127.10	302.90	70.4%
			0/1102	Urban Plot	404.00	113.56	290.44	71.9%
			0/1100	Urban Plot	402.00	101.89	300.11	74.7%
			0/1099	Urban Plot	375.00	94.00	281.00	74.9%
			0/1098	Urban Plot	390.00	92.30	297.70	76.3%
			0/1097	Urban Plot	380.00	80.81	299.19	78.7%
			0/1096	Urban Plot	380.00	78.61	301.39	79.3%
			0/1095	Urban Plot	380.00	71.35	308.65	81.2%
			0/1094	Urban Plot	375.00	60.32	314.68	83.9%
			0/1093	Urban Plot	380.00	55.77	324.23	85.3%
			0/1092	Urban Plot	380.00	49.71	330.29	86.9%
			0/1091	Urban Plot	385.00	34.21	350.79	91.1%
			0/1090	Urban Plot	366.00	11.00	355.00	97.0%
		Köseilyas	0/779	Urban Plot	3,000.00	933.37	2,066.63	68.9%
		Kayı	0/677	Urban Plot	27,473.44	2,614.03	24,859.41	90.5%
			0/1545	Urban Plot	10,150.81	450.14	9,700.67	95.6%

Source: SPV, March 2026. Expropriation Plans.

2.8. Avoidance and Minimisation

The **Kınalı–Malkara Motorway (KM Section)** is planned as a segment of the **Kınalı–Tekirdağ–Çanakkale–Savaştepe Motorway. As indicated previously,** the Project Company and the KGM signed a **memorandum of understanding** ("**MoU**") in September 2022, governing the terms and conditions of undertaking the KM Section as an additional work to the Malkara – Çanakkale Section, which was officially inaugurated on **19 March 2022.**

The MoU signed for the KM Section included the **1/5,000**-scale preliminary project design and route **(preliminary design)** as an attachment. Following the signing of the MoU, the SPV has initiated **1/1,000**-scale project design and engineering works **(current design)** for the optimisation of the route addressing technical, economic, E&S aspects and constraints.

The design, engineering, and route optimisation processes undertaken for the Project to date have been guided by the principle of **avoiding and minimising E&S risks and impacts**, as stipulated by, and in consultation with, the relevant national authorities. This approach has informed key decisions related to route selection, land use planning, and the siting of critical infrastructure components, with the aim of reducing potential adverse effects on local communities and the natural environment.

As is well established, BOT motorway projects implemented by the KGM are planned and designed in accordance with KGM's design criteria and technical specifications. In line with these institutional standards, the **minimisation of land use and expropriation** is considered as a fundamental criterion during the planning and preliminary design phases. The objective is to **reduce expropriation costs** and **mitigate the social and economic impacts** associated with land acquisition processes.

In addition to this, other important criteria considered by KGM include the following:

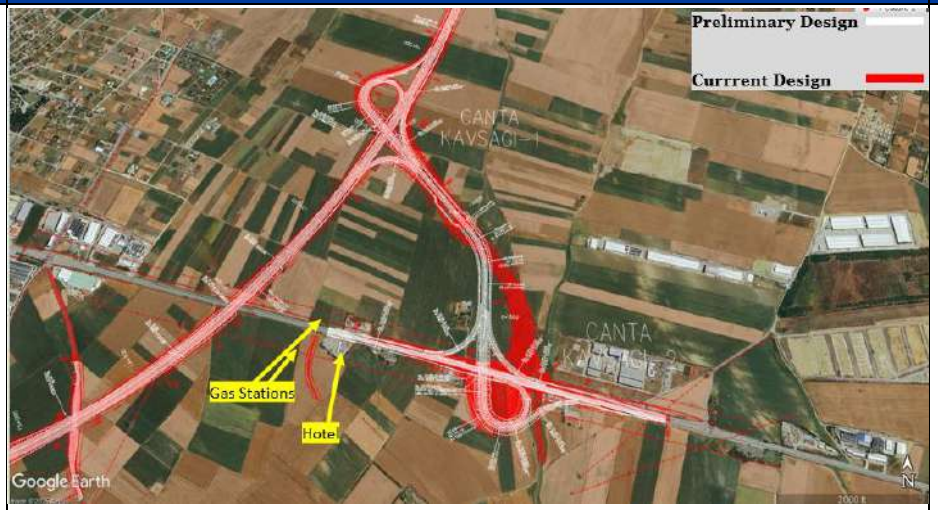
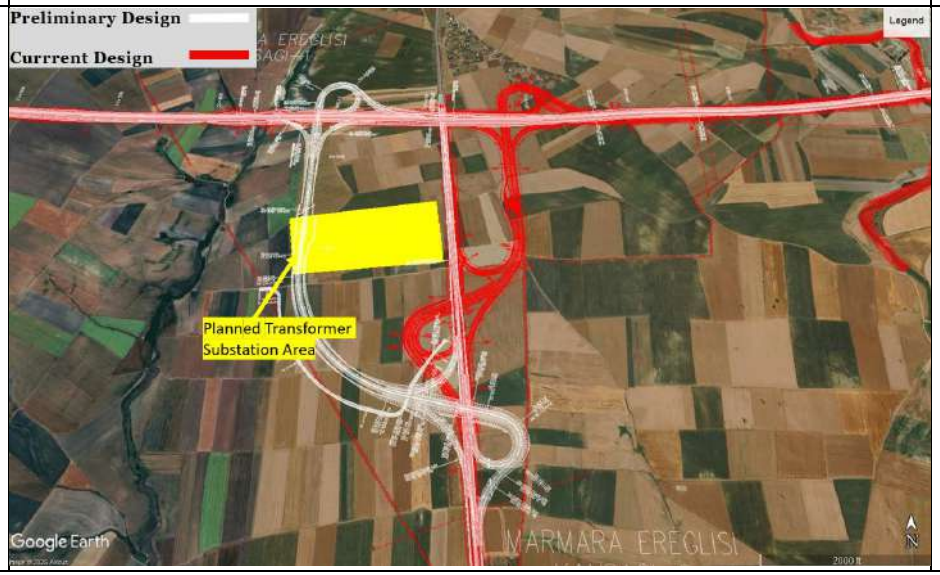
- Soil conditions and geohazards,
- Biodiversity and cultural heritage elements,
- Regional and local zoning and development status,
- Construction and O&M costs,
- Potential for future expansion, and
- Transportation safety and user comfort.

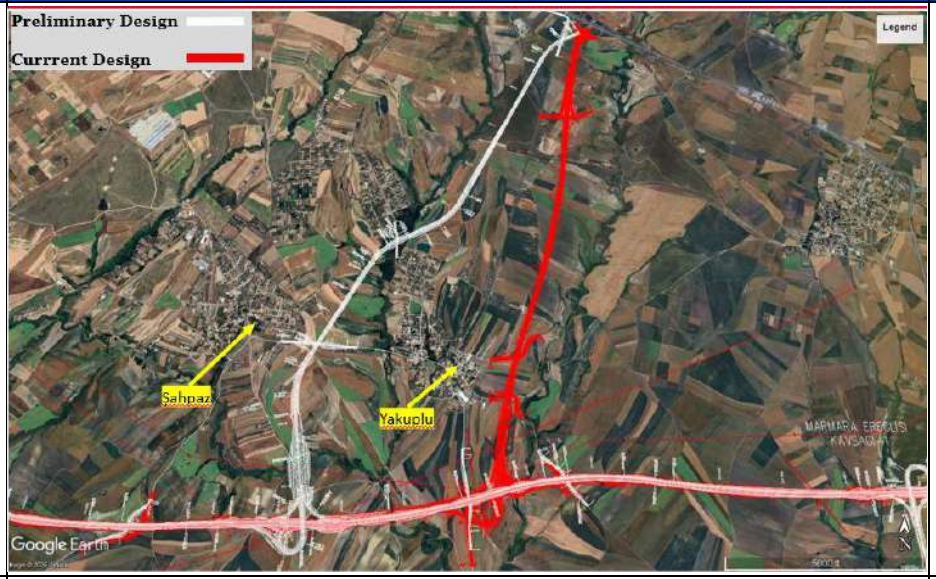
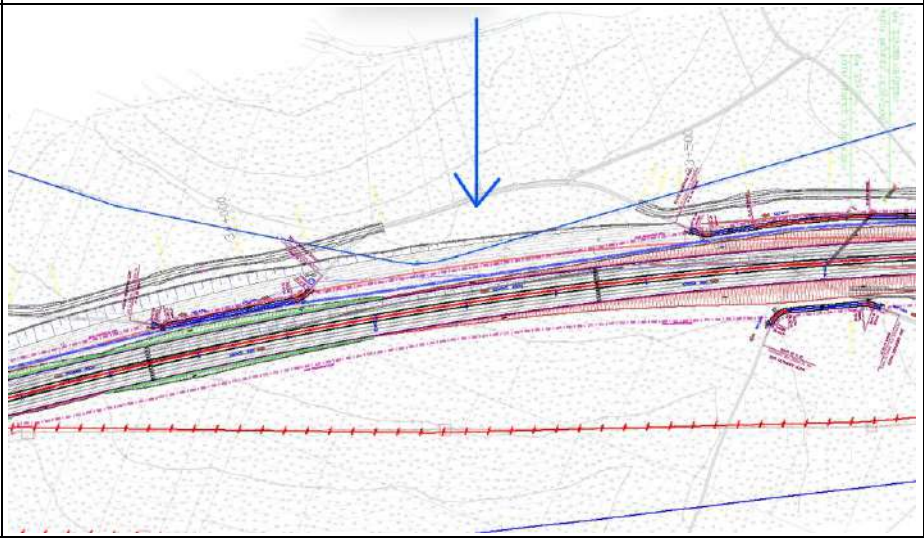
Specific to the Kınalı – Malkara Motorway, the following specific assets were taken into consideration in the appraisal of alternatives and the selection of the final alignment, as outlined in the Preliminary and Final Design Comparison Presentation of the SPV (*SPV, December 2025*):

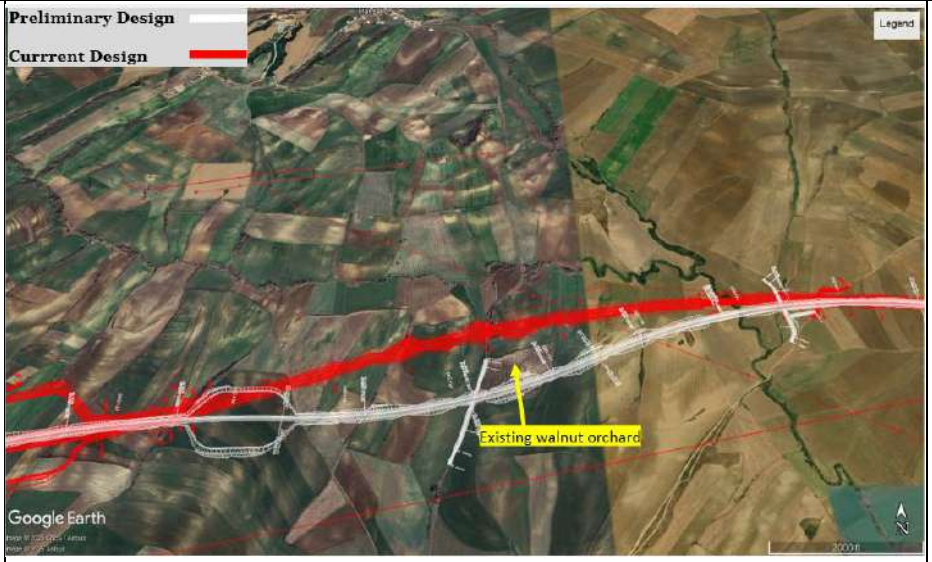
- Existing businesses (e.g. gas stations, hotel facilities) near Çanta State Road Connection
- Existing roundabout near Tekirdağ West Interchange
- Planned infrastructure of other institutions (e.g. energy transformer substation area) near Marmaraereğlisi Interchange
- Nearby settlements, private properties and local operations near Çorlu Airport Interchange
- Existing walnut orchards at various locations in Süleymanpaşa district
- Fragmentation of an existing vineyard and physical impact on a house in İnecik neighbourhood
- Access restrictions to nearby settlements or local businesses (e.g. existing fuel stations) near Tekirdağ and Tekirdağ East Interchanges
- Existing pastureland in Kayı neighbourhood of Süleymanpaşa district.

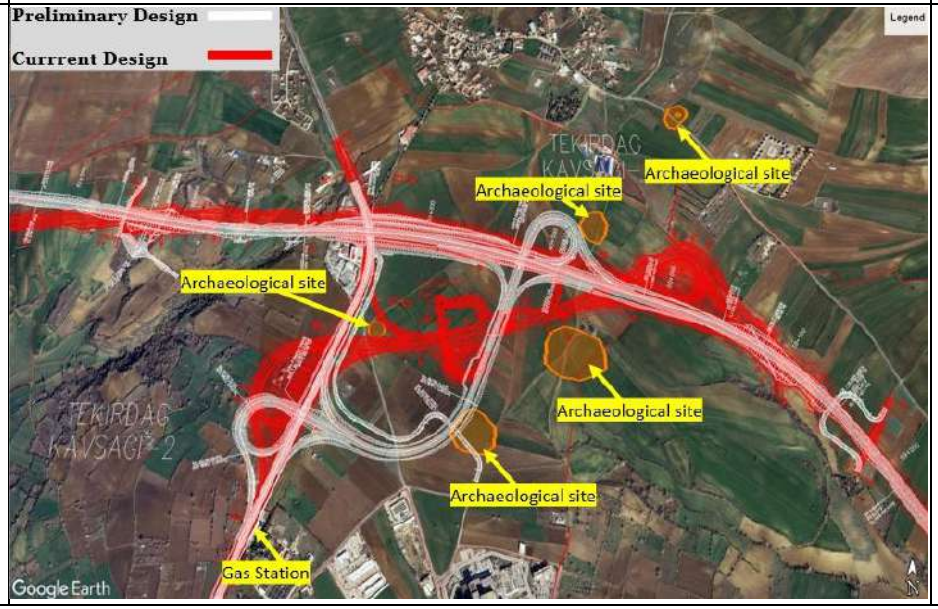
In light of the considerations mentioned above, the key route modifications carried out by the SPV as part of ongoing efforts to optimise the design and route and minimise the Project's land acquisition-related impacts are summarised in Table 2-24.

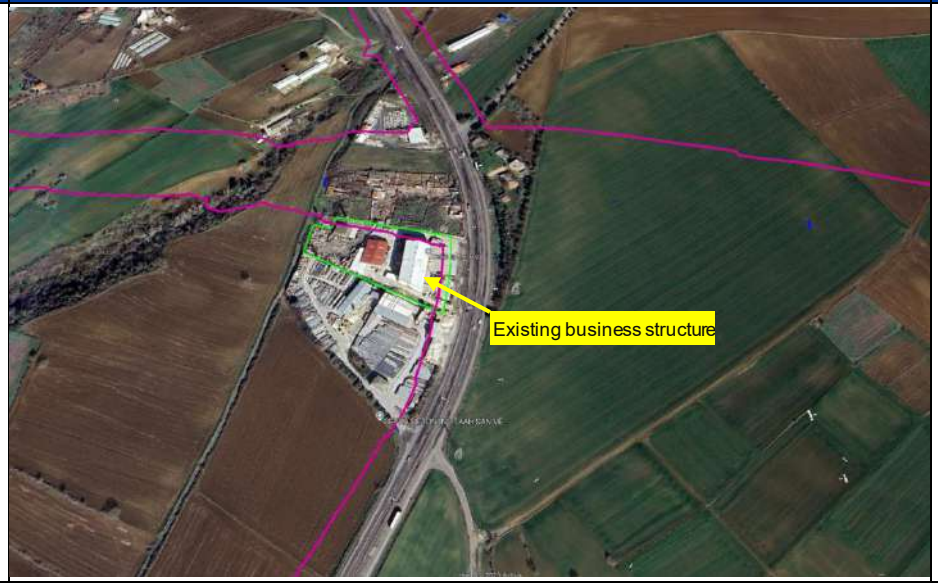
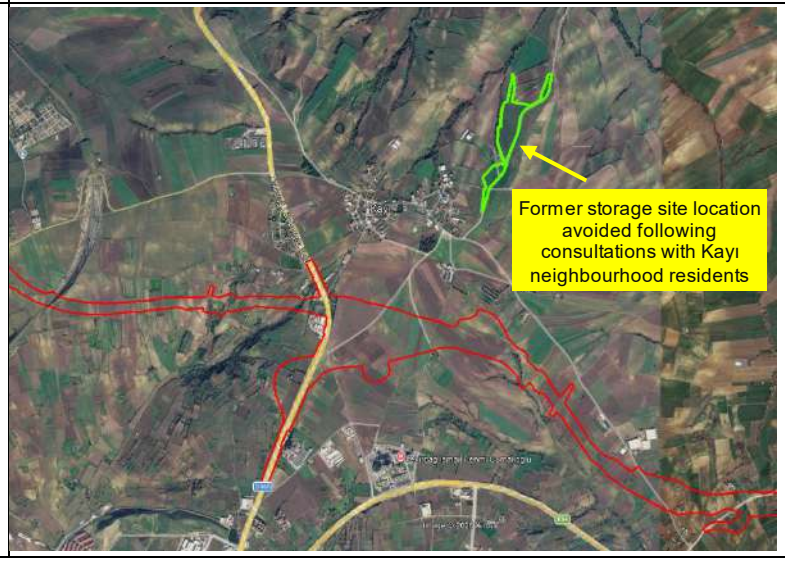
Table 2-24. Summary of the Site-specific Route Modifications done for the Project

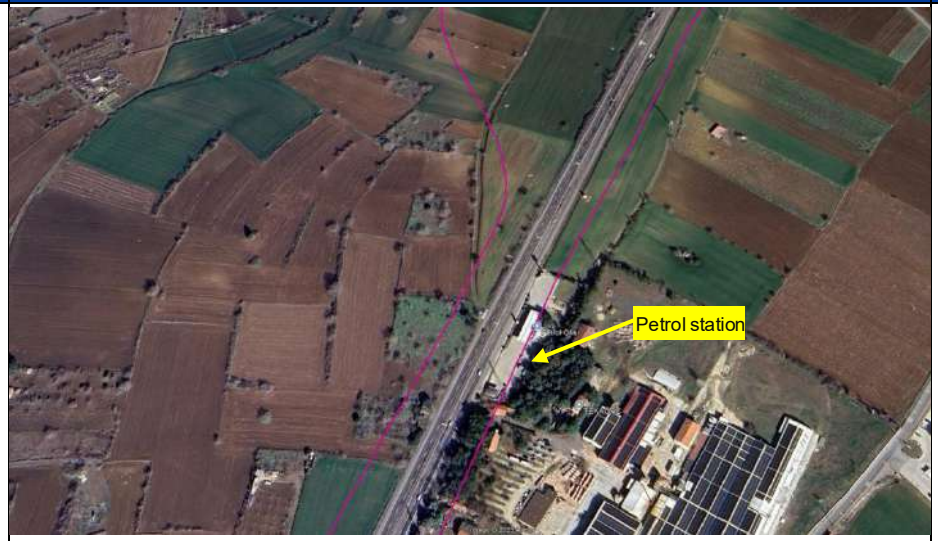
Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
İstanbul, Silivri	Çanta State Road Connection		• The interchange was shifted toward decreasing kilometres to minimise or eliminate interaction with existing gas stations and hotel facilities.
Tekirdağ, Marmaraereğlisi	Marmaraereğlisi Interchange		• The Marmaraereğlisi Interchange was moved toward decreasing kilometres since it overlapped the planned energy transformer substation area.

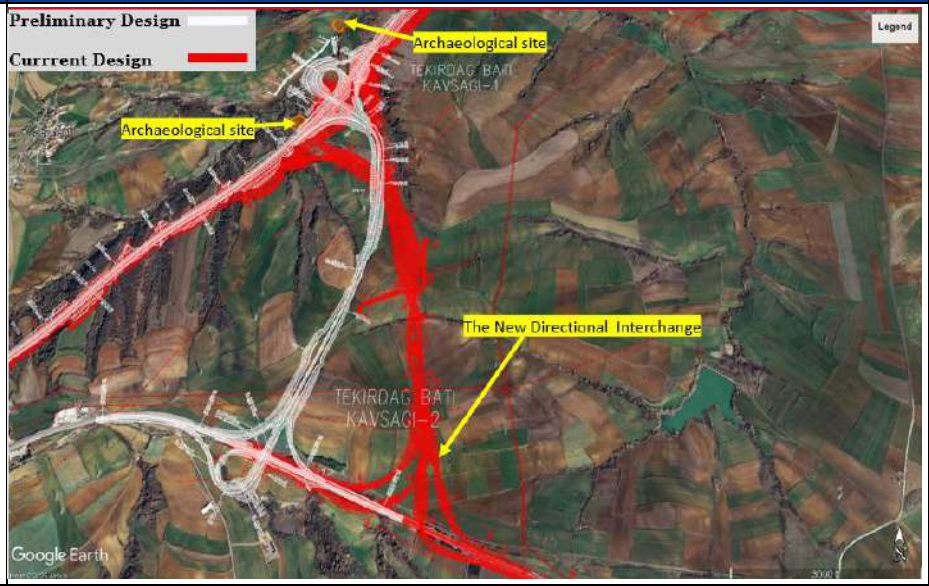
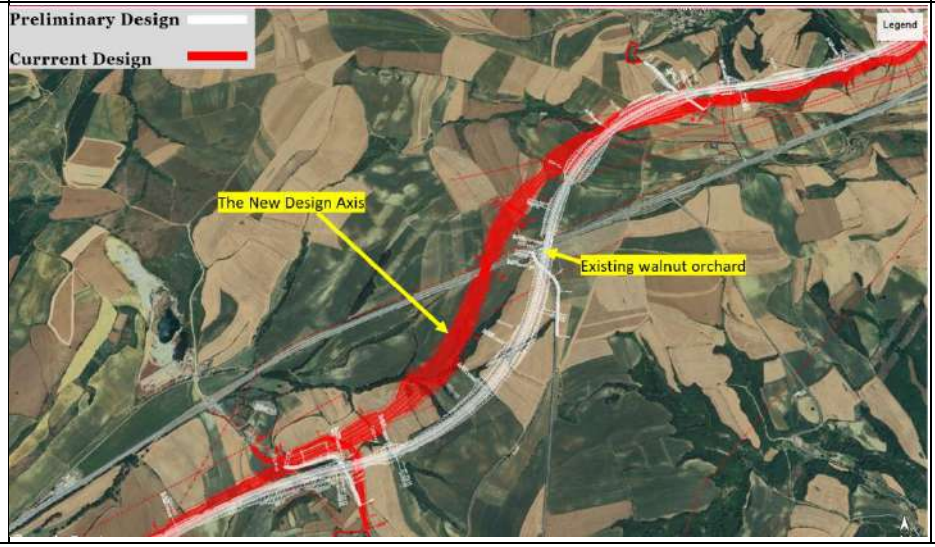
Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Çorlu	Çorlu Airport Interchange		• The interchange was revised by relocating the road outside residential areas to eliminate impacts on private properties and local operations.
Tekirdağ, Marmara ereğlisi	KM 33+000		• The route has been shifted southward due to the presence of the natural gas pipeline

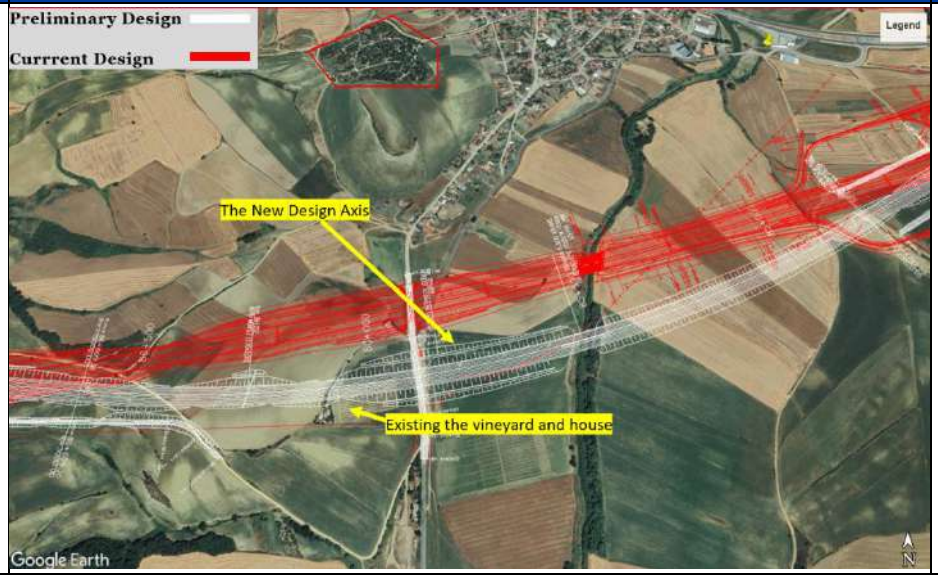
Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	KM 43+000 - KM 48+000		• The route was shifted northward to prevent damage to the walnut orchard in this area.
Tekirdağ, Süleymanpaşa	KM 50+300		• The route was shifted westward due to the natural gas well and distribution lines.

Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	Tekirdağ East Interchange		• The interchange and connection roads were revised to avoid nearby settlements, maintain access to nearby settlements.
Tekirdağ, Süleymanpaşa	Tekirdağ Interchange		• The Tekirdağ Interchange was revised to prevent blocking access to the fuel station on Tekirdağ–Muratlı State Road.

Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	Tekirdağ Interchange KM 60+500		• The design was revised to avoid physical impacts on the existing business structure located on Parcel No. 0/1545, with only partial land acquisition required.
Tekirdağ, Süleymanpaşa	KM 59+300		• The location of the planned material storage area was changed following consultations with the Kayı neighbourhood mukhtar and residents to avoid using the settlement's only pasture area.

Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	Tekirdağ Connection Road 0+465		• The Motorway alignment was revised to exclude the existing fuel station from the expropriation corridor.
Tekirdağ, Süleymanpaşa	Tekirdağ East Connection Road (KM 51+360; 0+000)		• The Motorway alignment was revised to exclude the roadside restaurant from the expropriation corridor. As the expropriation boundary terminates two parcels before this location, and the wire fence alignment also ends prior to reaching the site, no access restriction is anticipated for the business.

Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	Tekirdağ West Interchange		• The alignment was revised to prevent overlap with the existing roundabout.
Tekirdağ, Süleymanpaşa	KM 76+000 - KM 82+000		• The alignment was modified to avoid the walnut orchard near KM 79+500.

Province, District	Section/ KM Chainage	Previous and Current Design and Avoided Assets Shown on Satellite Image	Description of the Route Modifications Resulting in Avoidance or Minimisation Measures
Tekirdağ, Süleymanpaşa	KM 85+000 - KM 86+500		• The alignment was modified to avoid the fragmentation of a vineyard and relocation of a house near KM 86+000 at the request of the landowner.

The O&M Centre and MSFs **have been located within the Motorway's expropriation corridor to avoid any additional land acquisition outside the corridor.** In addition, the locations of the main and satellite construction camp sites, including the asphalt plant, concrete plant and prestressing beam production plant sites, have also been selected at the MSF locations, which lie within the Motorway's expropriation corridor **to avoid additional land acquisition for these temporary construction facilities.**

Avoidance and Minimisation during Project Implementation

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

- Based on the geological investigations (e.g. boreholes, trial pits, laboratory testing, etc.) and design works carried out, **1/1,000**-scale implementation projects are prepared by the SPV – covering aspects such as alignment revisions (e.g. slope angles, elevations) and engineering structures (e.g. overpasses, underpasses, culverts) – before construction begins, subject to approval by KGM and KÖSOB. During this process, multiple revisions are likely to occur on the **1/5,000**-scale preliminary route. This **dynamic process** will allow revisions on the route and incorporation of measures to further avoid impacts on lands and structures (for example, avoiding a structure through constructing a pile or a retaining wall, where technically feasible).

- In accordance with Project's avoidance strategy, the expropriation boundary for the Project **has been established** with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel. To this end, a parcel-based review and assessment covering the full alignment **was carried out** by KGM - KÖSOB and the valuation contractor, and avoidance measures have been implemented prior to start of expropriation. Where avoidance of orphan lands has not been feasible, affected people will have the right to submit requests to KGM seeking acquisition of orphan lands, as outlined in Section 3.1.2. These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.

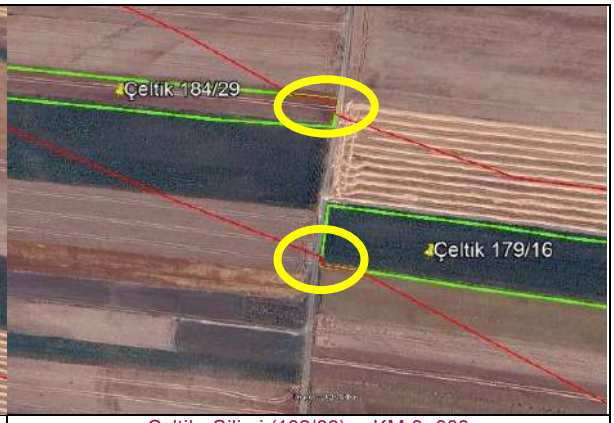
- The technical teams of the SPV and EPC Contractor will maintain engagement with affected people and, subject to KGM – KÖSOB's approval, carry out further studies to explore and implement further opportunities for avoiding or minimising displacement impacts.

- For assets located outside the expropriation corridor but considered sensitive receptors (e.g. houses potentially exposed to operational impacts such as noise or community health and safety risks):
    - These impacts will be monitored internally by the SPV and externally by the LESA.
    - EHS related requests and concerns will be evaluated by the SPV, in consultation with the owners and in alignment with Lenders' requirements, based on the findings of periodic E&S monitoring conducted by both the SPV E&S and the LESA teams.

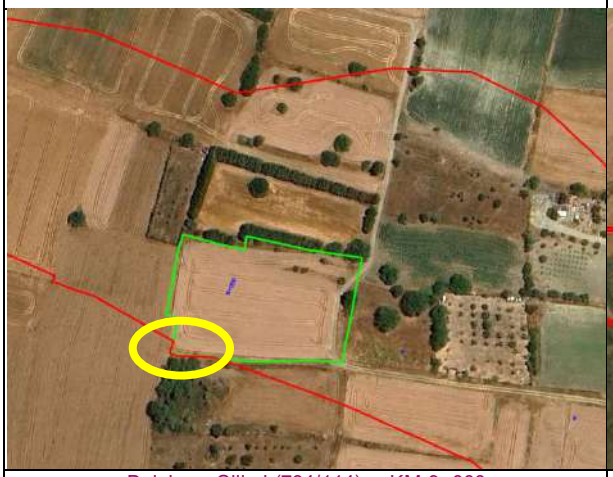
- If land acquisition, expropriation, or resettlement is deemed necessary as a result:
    - A **RAP Addendum** will be prepared and implemented by the SPV in coordination with KGM.
    - The mechanism for such acquisition during the operation phase will be clarified by the SPV in agreement with KGM.
    - All associated costs for acquisition and relocation will be covered under the RAP Fund, which will be allocated and managed by the SPV.

Figure 2-9 below presents examples of avoidance and minimisation achieved during the pre-construction phase. As the Project advances, the dynamic nature of the 1/1,000-scale implementation plans and profiles, similar avoidance strategies will continue to be duly considered and where possible implemented, in line with the approach outlined above.

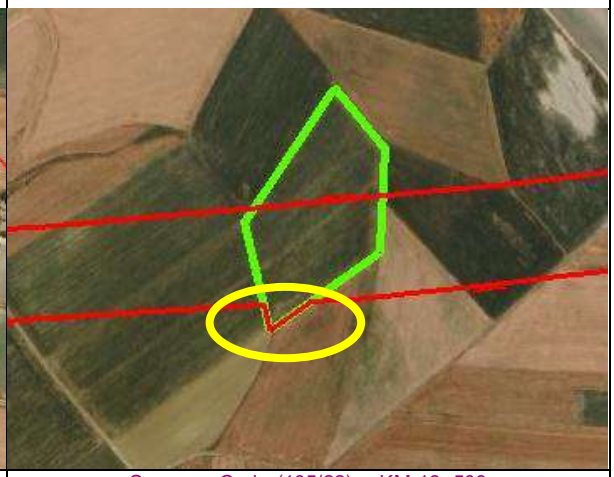
Çeltik, Silivri (102/83) – KM 4+850
House avoided through expropriation boundary revision



Çeltik, Silivri (102/83) – KM 8+000
Orphan land avoided through expropriation boundary revision



Balaban, Silivri (734/114) – KM 9+000
Orphan land avoided through expropriation boundary revision



Seymen, Çorlu (105/22) – KM 18+500
Land fragmentation and orphan land avoided through expropriation boundary revision

Türkmenli, Marmaraereğlisi (109/12) – KM 29+000
Orphan land avoided through expropriation boundary revision

Ahievren, Malkara (0/1359) – KM 103+000
Orphan land avoided through expropriation boundary revision

Figure 2-9. Examples of Avoidance through Expropriation Corridor Boundary Revision

3. Project Impacts

The Project affects **privately-owned**, **state-owned** (**public parcels** including non-registered or treasury) and **legal entity parcels** (such as municipalities, public corporations, associations, foundations, etc.) within Motorway's **expropriation corridor.**

The O&M Centre and MSFs **have been located within the Motorway's expropriation corridor to avoid any additional land acquisition outside the corridor.** In addition,

The locations of the main and satellite construction camp sites, including the asphalt plant, concrete plant and prestressing beam production plant sites, have been selected at the MSF locations, which lie within the Motorway's expropriation corridor **to avoid additional land acquisition for these temporary construction facilities.** However, **any other temporary construction facilities**, such as sub-contractor construction camp sites or storage areas **located outside the Motorway's expropriation corridor**, would also result in impacts on land.

The Project impacts presented in this RAP have been identified based on the following documentation received by the SPV from KGM - KÖSOB and reviewed by the RAP Consultant:

- **Section 1:** Expropriation Plans and Lists for KM 0 – 35 (approved by relevant Cadastral Office)
- **Section 2:** Expropriation Plans and Lists for KM 58 – 60 covering the location of the Main Construction Camp Site at KM 60+000
- **Section 3:** Expropriation Plans and Lists (approved by relevant Cadastral Office) **and** Structure Valuation Forms for KM 70 – 105

Table 3-1 presents a summary of the affected area and the number of parcels for the three sections, **by ownership.** Table 3-2 presents the same information by **land registry type.**

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

- Agricultural
- Urban plot ("*arsa*")
- Vineyard
- Pasture
- Meadow
- Land with structure
- Forest
- Road
- Creek
- Others

The cadastral approval process for the expropriation plans of **KM 35 – 70** is ongoing, and the indicative figures provided for this section will be confirmed and as required updated in the next updates of this RAP once the approved expropriation plans become available.

Table 3-1. Summary of Affected Area and Number of Parcels – per **Ownership**

Ownership	Total Expropriation Area								Number of Parcels							
	Section 1		Section 2		Section 3		**Total**		Section 1		Section 2		Section 3		**Total**	
	Area (m^2)	(%)	Area (m^2)	(%)	Area (m^2)	(%)	**Area (m^2)**	**(%)**	No.	(%)	No.	(%)	No.	(%)	**No.**	**(%)**
Privately-owned																
Privately-owned*	4,970,684.31	94.12	6,020,854.16	94.35	3,113,007.39	68.70	**14,104,545.86**	**87.10**	1,068	88.56	747	85.08	438	77.94	**2,253**	**85.15**
Litigious	-	-	12,136.12	0.19	-	-	**12,136.12**	**0.07**	-	-	3	0.34	-	-	**3**	**0.11**
State-owned																
Treasury	28,820.15	0.55	9,324.85	0.15	17,666.10	0.39	**55,811.10**	**0.34**	27	2.24	8	0.91	20	3.56	**55**	**2.08**
Treasury – Forestry	-	-	-	-	936,210.72	20.66	**936,210.72**	**5.78**	-	-	-	-	26	4.63	**26**	**0.98**
Non-registered – Forestry	-	-	-	-	4,912.55	0.11	**4,912.55**	**0.03**	-	-	-	-	1	0.18	**1**	**0.04**
Common Property – Pasture	85,123.94	1.61	590.69	0.01	184,231.43	4.07	**269,946.06**	**1.67**	2	0.17	1	0.11	6	1.07	**9**	**0.34**
Common Property – Meadow	718.12	0.01	-	-	63,430.10	1.40	**64,148.22**	**0.40**	1	0.08	-	-	1	0.18	**2**	**0.08**
Common Property – Agricultural Land	-	-	-	-	21,929.25	0.48	**21,929.25**	**0.14**	-	-	-	-	1	0.18	**1**	**0.04**
Common Property – Other[39]	-	-	15,742.70	0.25	-	-	**15,742.70**	**0.10**	-	-	1	0.11	-	-	**1**	**0.04**
Road	116,415.41	2.20	133,773.44	2.10	78,627.43	1.74	**328,816.28**	**2.03**	85	7.05	66	7.52	42	7.47	**193**	**7.29**
Non-registered	64,484.35	1.22	137,208.56	2.15	59,344.17	1.31	**261,037.08**	**1.61**	15	1.24	32	3.64	17	3.02	**64**	**2.42**
Legal Entity	14,822.87	0.28	51,984.59	0.81	51,724.52	1.14	**118,531.98**	**0.73**	8	0.66	20	2.28	10	1.78	**38**	**1.44**
Total	**5,281,069.15**	**100**	**6,381,615.11**	**100**	**4,531,083.66**	**100**	**16,193,767.92**	**100**	**1,206**	**100**	**878**	**100**	**562**	**100**	**2,646**	**100**

Source: SPV, March 2026.

Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*

** One of these parcels is jointly owned by private owner(s) and the state.*

[39] The parcels classified as "Other" are livestock watering locations ("*sıvat yeri*").

Table 3-2. Summary of Affected Area and Number of Parcels – per **Land Registry Type**

Land Registry Type	Total Expropriation Area								Number of Parcels							
	Section 1		Section 2		Section 3		**Total**		Section 1		Section 2		Section 3		**Total**	
	Area (m^2)	(%)	Area (m^2)	(%)	Area (m^2)	(%)	**Area (m^2)**	**(%)**	No.	(%)	No.	(%)	No.	(%)	**No**	**(%)**
Agricultural	4,912,008.61	93.01	5,930,309.65	92.93	3,157,325.38	69.68	**13,999,643.64**	**86.45**	1,073	88.97	657	74.83	443	78.83	**2,173**	**82.12**
Road	116,415.41	2.20	133,773.44	2.10	79,018.45	1.74	**329,207.30**	**2.03**	85	7.05	66	7.52	43	7.65	**194**	**7.33**
Creek	48,163.42	0.91	132,818.75	2.08	27,562.25	0.61	**208,544.42**	**1.29**	11	0.91	27	3.08	10	1.78	**48**	**1.81**
Pasture	94,988.37	1.80	45,110.33	0.71	184,231.43	4.07	**324,330.13**	**2.00**	4	0.33	3	0.34	6	1.07	**13**	**0.49**
Forest	-	-	-	-	941,123.27	20.77	**941,123.27**	**5.81**	-	-	-	-	27	4.80	**27**	**1.02**
Urban plot	13,147.91	0.25	19,826.04	0.31	-	-	**32973.95**	**0.20**	8	0.66	42	4.78	-		**50**	**1.89**
Vineyard	1,830.66	0.03	49,812.89	0.78	19,740.53	0.44	**71,384.08**	**0.44**	5	0.41	18	2.05	3	0.53	**26**	**0.98**
Meadow	842.82	0.02	19,486.83	0.31	77,331.87	1.71	**97,661.52**	**0.60**	2	0.17	37	4.21	6	1.07	**45**	**1.70**
Land with structure	74,111.00	1.40	18,564.72	0.29	6,839.36	0.15	**99,515.08**	**0.61**	3	0.25	3	0.34	2	0.36	**8**	**0.30**
Other[40]	19,560.95	0.37	31,912.46	0.50	37,911.12	0.84	**89,384.53**	**0.55**	15	1.24	25	2.85	22	3.91	**62**	**2.34**
Total	**5,281,069.15**	**100**	**6,381,615.11**	**100**	**4,531,083.66**	**100**	**16,193,767.92**	**100**	**1,206**	**100**	**878**	**100**	**562**	**100**	**2,646**	**100**

Source: SPV, March 2026.

Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*

[40] The "others" category broadly encompasses features such as pipelines, channels, pylon, livestock watering point and other miscellaneous land uses not classified under the primary categories.

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

- Permanent land take: All land on which **Project components** within the designated expropriation corridor will be constructed – including the Motorway, interchanges, engineering structures (overpasses, underpasses, culverts, etc.), MSFs, and O&M centre – will be subject to **permanent** land take.
    - Permanent acquisition of **privately-owned parcels** is undertaken by KGM – KÖSOB through expropriation in accordance with the Expropriation Law, as previously outlined in Section 2.6.1 above.
    - **State-owned (public) parcels** are allocated to the Project through procedures carried out by KGM - KÖSOB in coordination with the relevant authorities, without requiring payment, as previously outlined in Section 2.6.2 above.
    - Parcels owned by legal entities are subject to expropriation in accordance with the provisions of the Expropriation Law or allocation of use rights, as previously outlined in Section 2.6.3 above.

  During the operation phase, access to lands within the expropriation corridor will be fully restricted for local communities and unauthorised third parties. In accordance with KGM Technical Specifications, the **entire Motorway alignment will be fenced** upon completion of construction to ensure the safety of vehicular traffic, pedestrians, and wildlife.

- Temporary land take: The SPV has located the construction camp sites and part of the facilities **within the Motorway's expropriation corridor** to avoid any additional land acquisition outside the corridor.

  Should any **temporary facilities** be situated outside the Project's expropriation corridor, the respective lands will be subject to **temporary** land take, in accordance with the processes outlined below:

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

  The land-use types of the parcels to be temporarily used may vary, such as agricultural, pasture, forest, etc. The required land-use permits (such as permits for the non-agricultural use of agricultural land, change of allocation for pasture parcels, or forestry permits for forest parcels) will be obtained by KGM – KÖSOB or where relevant by SPV or EPC Contractor – from the relevant authorities (for example, the Provincial Directorate of Agriculture and Forestry for agricultural and pasture parcels, or the relevant forestry directorate for forest parcels), depending on the applicable land-use type and as required by the relevant authorities.

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

Permanent or temporary land acquisition may lead to physical or economic displacement for users of the affected lands and structures. Based on an analysis of the available expropriation plans prepared and issued by the valuation contractor, the land acquisition-related impacts are primarily classified under the following:

i. **Affected lands** (may include non-residential and non-commercial structures such as depots, barns, wells, etc.)

ii. **Affected residential structures (houses)**

iii. **Affected businesses**

iv. **Vulnerable people**

v. **Temporary losses/impacts during construction**[41], and

vi. **Impacts during operation**

The impact on each category further varies depending on whether the land or structures are subject to **full** or **partial** expropriation – the latter may result in economic impacts in cases of orphaned or fragmented land.

Table 3-3 summarises the method of land take for permanent and temporary Project facilities.

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

Table 3-3. Method of Land Take for Permanent and Temporary Project Facilities (as of end of March 2026)

Location	Number of Facility Site	App. Motorway KM	Number of Parcels subject to Land Take (according to exp plans)	Parcel No.	Parcel Land Use Type (according to expropriation plans)	Ownership (according to expropriation plans)	Method of Land Take (please see Section for the current expropriation status)
Expropriation Corridor							
Motorway (incl. Connection Roads, Interchanges, Engineering Structures listed in Section 2.3 – overpasses, underpasses and culverts – MSFs which are located within the Expropriation Corridor; the **locations of the main and satellite construction camp sites**, including the asphalt plant, concrete plant and prestressing beam production plant sites, have been selected at the MSF locations, which lie within the Motorway's expropriation corridor)		Section 1 (KM 0 – 35)	1,206	Indicated in the expropriation plans of the Project	- Agricultural: 1,073 parcels - Roads: 85 parcels - Creek: 11 parcels - Urban plot: 8 parcels - Pasture: 4 parcels - Vineyard: 5 parcels - Meadow: 2 parcels - Lands with structures[42]: 3 parcels - Others: 15 parcels	- Private: 1,068 parcels - Legal entity: 8 parcels - Treasury: 27 parcels - Common property – pasture : 2 parcels - Common property – meadow: 1 parcel - Non-registered: 15 parcels - Road: 85 parcels	**Permanent** – Expropriation by KGM - KÖSOB (please see Section 2.6 for the current expropriation status)
		Section 2 (KM 35 – 70)	878	Indicated in the expropriation plans of the Project	- Agricultural: 657 parcels - Roads: 66 parcels - Urban plot: 42 parcels - Creek: 27 parcels - Pasture: 3 parcels - Vineyard: 18 parcels - Meadow: 37 parcels - Lands with structures[43]: 3 parcels - Others: 25 parcels	- Private: 747 parcels - Legal entity: 20 parcels - Treasury: 8 parcels - Common property - pasture: 1 parcel - Common property – other (livestock watering location "*sıvat yeri*"): 1 parcel - Non-registered: 32 parcels - Road: 66 parcels - Litigious:3 parcels	
		Section 3 (KM 70 – 105)	562	Indicated in the expropriation plans of the Project	- Agricultural: 443 parcels - Roads: 43 parcels - Forest: 27 parcels - Creek: 10 parcels - Pasture: 6 parcels - Vineyard: 3 parcels - Meadow: 6 parcels - Lands with structures[44]: 2 parcels - Others: 22 parcels	- Private: 438 parcels - Legal entity: 10 parcels - Treasury: 46 parcels - Common property – pasture: 6 parcels - Common property – meadow: 1 parcel - Common property – agricultural: 1 parcel - Non-registered: 18 parcels - Road: 42 parcels	
		Total	**2,646**				
Displacement Works for Existing Infrastructure of Other Institutions Overlapping with the Project (referring to existing transmission lines, pipelines, water network, etc. that need to be relocated due to their overlap with the Motorway alignment)		Planning studies are ongoing, the number of parcels affected will be identified in due course.	To be identified	To be identified	To be identified	To be identified	**Permanent for tower pylon locations or other permanent above ground facilities –** Expropriation of tower pylon locations or other permanent above ground facilities by KGM – KÖSOB in coordination with the relevant institutions (e.g. Türkiye Electricity Transmission Corporation (TEİAŞ) in case of energy transmission lines) (permanent land take only – no easement) **Easement Rights** – For transmission line alignment (easement only– no permanent land take)
Excavated Material Storage Areas (Dump Sites)							
Silivri, Çorlu, Marmaraereğlisi, Süleymanpaşa, Malkara	There are 13 potential excavated materials storage sites that are under consideration by the Project.	Outside the Motorway's expropriation corridor	8	Please see Table 2-10 for the list of parcels	Forest	- State	**Permanent** – Allocation to the Project through forestry permit
			16	Please see Table 2-10 for the list of parcels	Pasture	- State	**Permanent** – Allocation to the Project
Quarries and Borrow Pits							
Silivri, Çorlu, Süleymanpaşa, Malkara, Şarköy	There are 4 borrow pits and 3 quarries that are under consideration by the Project.	Outside the Motorway's expropriation corridor	7	Please see Table 2-13 for the list of parcels	Forest	- State	**Temporary** – Allocation to the Project through forestry permit
			4		Pasture	- State	**Temporary** – Allocation to the Project

[42] Lands with structures refer to land parcels whose registry types include references to buildings or constructed features such as houses, barns, workplaces, depots, graveyards, and similar built structures.
[43] Lands with structures refer to land parcels whose registry types include references to buildings or constructed features such as houses, barns, workplaces, depots, graveyards, and similar built structures.
[44] Lands with structures refer to land parcels whose registry types include references to buildings or constructed features such as houses, barns, workplaces, depots, graveyards, and similar built structures.

3.1. Affected Lands

The **impact categories** for affected lands include the following; therefore, **owners/shareholders**[45] **and/or formal and informal users** of these lands may be subject to the Project's displacement impacts. The RAP will identify land-related impacts based on expropriation data combined with findings from the RAP field surveys.

- Permanent loss of private parcels (agricultural parcels and urban plots)
- Permanent loss of state-owned parcels (e.g. treasury, non-registered parcels) which are used for economic purposes)
- Permanent loss of forest land used by local people for economic purposes
- Permanent loss of registered pasture lands
- Restriction of access to lands used for grazing – located out of Project expropriation corridor (public or private) due to land fragmentation or other Project-related factors
- Orphan lands
- Fragmented lands
- Loss of crops on private or public parcels
- Loss of trees (fruit or non-fruit trees) on private or public parcels
- Loss of non-residential structures on affected private or public parcels (non-residential/secondary structures, depots, barns, sheds, etc.)
- Litigious properties ("*ihtilaflı bulunan mülkiyet*")
- Impacts due to the establishment of servitude (easement resulting in loss of value of the immovable asset) – such impacts are not anticipated for lands within the Motorway's expropriation corridor. However, the relocation of existing infrastructure owned by other institutions that overlaps with the Project may require the establishment of servitude, either in addition to or instead of expropriation.

The identification of formal and informal users of the affected lands was initiated by the SPV in November 2025 as part of the RPF studies. Further field surveys were completed with the project affected people (PAP) as part of this RAP. Information on PAPs, including landowners and land users (formal and informal), is provided in Section 3.2, while their current socio-economic conditions, based on the RAP field surveys, are presented in Chapter 4.

3.1.1. Permanent Loss of Lands

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

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

Table 3-4 presents the affected neighbourhoods by the number of affected parcels, which will be permanently expropriated or acquired by KGM for the Project, per their ownership.

[45] According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "*most jurisdictions accommodate joint ownership of properties, whether land or houses. Where two or more owners jointly own an affected plot of land or a building, these co-owners will jointly receive the compensation, which must be split between them, either equally or according to the number of shares they hold in the affected property*". This applies to lands and assets acquired by administrations in accordance with Turkish legislation as well.

Table 3-4. Affected Neighbourhoods per Number of Affected Parcels – **per Ownership**

Section	Province	District	Neighbourhood	Number of Affected Parcels							Total
				Private	Public					Legal Entities	
					Treasury (included in forestry parcels)	Common Property - Pasture	Common Property - Agriculture, Meadow or Other[46]	Non-registered (included in forestry parcel)	Road		
Section 1 KM 0-35	İstanbul	Silivri	Alipaşa	46					5	2	53
			Çeltik	144				1	6		151
			Semizkumlar	3							3
			Yolçatı	31					1		32
			Sancaktepe	94	5			2	4		105
			Balaban	178*	8			3	3	1	193
			Değirmenköy	137			1		8		146
			Gümüşyaka	65				2	6		73
	Tekirdağ	Marmara ereğlisi	Sultanköy	10					1		11
			Cedit Ali Paşa	15					3		18
			Yakuplu	108	5			3	9	3	128
			Türkmenli	8	1				2		11
			Çeşmeli(**)	44		2		1	8		55
		Çorlu	Seymen	112				2	20	2	136
			Şahpaz	69	7			1	8		85
			Türkgücü	4	1				1		6
Sub-total KM 0-35			**16**	**1,068**	**27**	**2**	**1**	**15**	**85**	**8**	**1,206**
Section 2 KM 35-70	Tekirdağ	Marmara ereğlisi	Çeşmeli(**)	7					4		11
		Çorlu	Yenice	36				2	10		48
			Maksutlu	1				2			3
		Süleyman paşa	Karaevli	36				1	4		41
			Husunlu	35	2		1	1	2		41
			Gazioğlu	229				4	12	7	252
			Köseilyas	61	2			2	4	1	70
			Kayı	85		1		1	8	2	97
			Eskicami	3							3
			Gündoğdu	97					6	4	107
			Aydoğdu	12(***)						2	14
			Zafer	60	3			1	4	4	72
			Yağcı	88(****)	1			18	12		119
Sub-total KM 35-70			**12**	**750**	**8**	**1**	**1**	**32**	**66**	**20**	**878**
Section 3 KM 70-105	Tekirdağ	Süleyman paşa	Seymenli	43	10	2		3	3	4	65
			Güveçli	37	2	1			3	2	45
			Nusratlı	27	4				1		32
			Karahisarlı	17	1		1	2	2		23
			Nusratfakı	47	4	2		2	7		62
			İnecik	96	6	1	1	2	6	2	114
			Akçahalil	54	9				5	1	69
			Kınıklar	6	6				2		14
		Malkara	Yenice	38	4			5	2	1	50
			Hereke	30				2	7		39
			Ahievran	43				2	4		49
Sub-total KM 70-105			**11**	**438**	**46**	**6**	**2**	**18**	**42**	**10**	**562**
Total			**39**	**2,256**	**81**	**9**	**4**	**65**	**193**	**38**	**2,646**

Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*

(*) One of these parcels is jointly owned by private owner(s) and the state.

(**) This settlement falls within both KM 0 – 35 and KM 35 – 70 sections; however, it has been counted only once to avoid double counting.

(***) Out of the 12 privately owned parcels, 2 are under litigation and are categorised under "Private".

(****) Out of the 88 privately owned parcels, 1 is under litigation and is categorised under "Private".

[46] The parcels classified as "Other" are livestock watering places ("*sıvat yeri*").

Table 3-5 presents the affected neighbourhoods by the **expropriation area**, per their ownership.

Table 3-5. Affected Neighbourhoods per Expropriation Area – per Ownership

Section	Province	District	Neighbourhood	Expropriation Area (m^2)							Total
				Private	Public					Legal Entities	
					Treasury	Common Property - Pasture	Common Property – Agriculture, Meadow or Other[47]	Non-registered	Road		
Section 1 KM 0-35	İstanbul	Silivri	Alipaşa	333,488.43					6,644.51	1,594.87	341,727.81
			Çeltik	442,574.78				5,549.53	12,528.64		460,682.95
			Semizkumlar	50,990.83							50,990.83
			Yolçatı	92,626.29					848.69		93,474.98
			Sancaktepe	130,129.11	2,890.43			2,908.26	2,551.11		138,478.91
			Balaban	740,597.11(*)	4,737.14			17,291.70	10,987.42	590.94	774,204.31
			Değirmenköy	550,894.87			718.12		14,481.34		566,094.33
			Gümüşyaka	261,504.88				18,659.82	15,261.28		295,425.98
	Tekirdağ	Marmaraereğlisi	Sultanköy	89,657.52					1,074.18		90,731.70
			Cedit Ali Paşa	94,545.63					1,884.14		96,429.77
			Yakuplu	518,896.08	873.67			7,174.38	13,277.31	2,772.63	504,094.07
			Türkmenli	56,900.43	733.54				2,117.05		59,751.02
			Çeşmeli(**)	413,203.89		85,123.94		3,573.18	14,453.79		516,354.80
		Çorlu	Seymen	764,006.43				7,976.79	14,639.32	9,864.43	796,486.97
			Şahpaz	405,727.41	2,635.74			1,350.69	5,036.70		414,750.54
			Türkgücü	24,940.62	16,949.63				629.93		42,520.18
Sub-total KM 0-35			**16**	**4,970,684.31**	**28,820.15**	**85,123.94**	**718.12**	**64,484.35**	**116,415.41**	**14,822.87**	**5,281,069.15**
Section 2 KM 35-70	Tekirdağ	Marmaraereğlisi	Çeşmeli(**)	170,418.01					6,330.03		176,748.04
		Çorlu	Yenice	918,529.69				6,004.68	13,261.08		937,795.45
			Maksutlu	20,821.00				4,487.79			25,308.79
		Süleymanpaşa	Karaevli	403,265.80				6,284.20	5,910.31		415,460.31
			Husunlu	591,939.36	4,653.55		15,742.70	3,441.26	9,357.10		625,133.97
			Gazioğlu	1,103,843.80				6,917.18	23,851.72	37,108.29	1,171,720.99
			Köseilyas	313,686.42	2,803.45			2,211.80	16,913.77	6,200.00	341,815.44
			Kayı	710,282.31		590.69		23,376.56	15,942.39	672.85	750,864.80
			Eskicami	5,274.46							5,274.46
			Gündoğdu	336,755.00					17,357.89	72.00	354,184.89

[47] The parcels classified as "Other" are livestock watering places ("*sıvat yeri*").

Section	Province	District	Neighbourhood	Expropriation Area (m^2)							Total
				Private	Public					Legal Entities	
					Treasury	Common Property - Pasture	Common Property – Agriculture, Meadow or Other[47]	Non-registered	Road		
			Aydoğdu	71,674.66 (***)						2,560.91	74,235.57
			Zafer	248,186.80	1,865.47			1,825.92	2,846.60	5,370.54	260,095.33
			Yağcı	1,138,312.97 (****)	2.38			82,659.17	22,002.55		1,242,977.07
Sub-total KM 35-70			**12**	**6,032,990.28**	**9,324.85**	**590.69**	**15,742.70**	**137,208.56**	**133,773.44**	**51,984.59**	**6,381,615.11**
Section 3 KM 70-105	Tekirdağ	Süleymanpaşa	Seymenli	336,493.15	306,608.13	135,564.30		6,651.45	4,237.31	24,117.00	813,671.34
			Güveçli	262,280.06	8,527.97	23,100.58			6,134.97	113.00	300,156.58
			Nusratlı	133,348.62	1,152.88				5,378.57		139,880.07
			Karahisarlı	118,542.38	3,153.48		21,929.25	13,726.25	2,082.89		159,434.25
			Nusratfakı	492,069.09	3,568.64	17,590.10		5,886.22	8,535.77		527,649.82
			İnecik	665,326.75	112,075.15	7,976.45	63,430.10	5,055.30	11,718.05	5,973.42	871,555.22
			Akçahalil	310,805.57	253,651.61				6,145.24	10.58	570,613.00
			Kınıklar	59,085.28	97,071.26				877.93		157,034.47
		Malkara	Yenice	241,427.28	168,067.70			28,367.62	7,525.46	21,510.52	466,898.58
			Hereke	311,551.41				2,264.10	19,570.35		333,385.86
			Ahievran	182,077.80				2,305.78	6,420.89		190,804.47
Sub-total KM 70-105			**11**	**3,113,007.39**	**953,876.82**	**184,231.43**	**85,359.35**	**64,256.72**	**78,627.43**	**51,724.52**	**4,531,083.66**
Total			**39**	**14,116,681.98**	**992,021.82**	**269,946.06**	**101,820.17**	**265,949.63**	**328,816.28**	**118,531.98**	**16,193,767.92**

Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*

(*) One of these parcels is jointly owned by private owner(s) and the state.

(**) This settlement falls within both KM 0 – 35 and KM 35 – 70 sections; however, it has been counted only once to avoid double counting.

(***) Out of the 12 privately owned parcels, 2 are under litigation and are categorised under “Private”.

(****) Out of the 88 privately owned parcels, 1 is under litigation and is categorised under “Private”.

3.1.1.1. Pasture

There are a total of **13 parcels** registered as **pasture**, comprising nine state-owned common property parcels, two privately-owned parcels, and two parcels owned by a legal entity (Çorlu Municipality). These parcels are located in **Çorlu, Marmaraereğlisi** and **Süleymanpaşa** districts, as listed in Table 3-6.

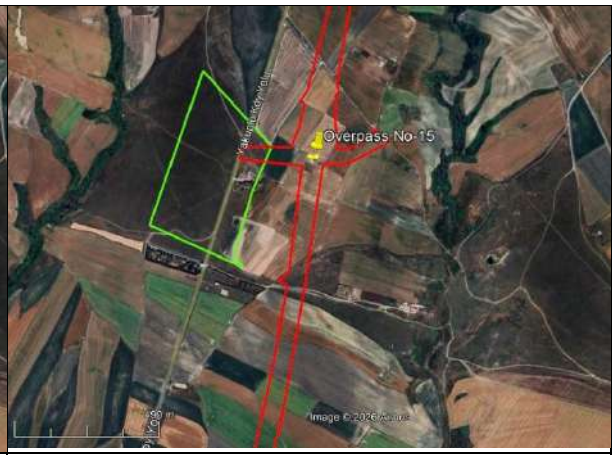
Figure 3-1 presents a satellite image of the parcels registered as pasture.

Table 3-6. Pasture Parcels within the Motorway Expropriation Corridor

No	Section	District	Neighbourhood	Motorway KM	Lot/ Parcel No.	Ownership	Title Deed Area (m^2)	Expropriation Area	
								m^2	Ratio
1	KM 0-35	Çorlu	Seymen	3+517	53/1	Çorlu Municipality	60,267.45	6,271.95	10.41
2				3+832	54/3		170,517.67	3,592.48	2.11
3		Marmaraereğlisi	Çeşmeli	30+086	188/76	Common property	657,080.03	51,019.41	7.76
4				30+506	185/37		355,809.13	34,104.53	9.59
5	KM 35-70	Süleymanpaşa	Kayı	58+533	0/1111		1,000.00	590.69	59.07
6			Yağcı	68+222	0/41	Private	48,650.00	12,127.10	24.93
7			Yağcı	68+533	0/101		244,300.00	32,392.54	13.26
8	KM 70-105		Seymenli	72+539	107/74	Common property	191,693.00	50,390.57	26.29
9			Seymenli	73+231	107/77		126,648.48	85,173.73	67.25
10			Güveçli	76+218	109/34		62,108.68	23,100.58	37.19
11			Nusratfakı	80+436	107/26		50,742.42	15,333.98	30.22
12			Nusratfakı	80+507	119/2		9,426.92	2,256.12	23.93
13			İnecik	84+867	161/7		30,672.84	7,976.45	26.00
Total							**2,008,916.62**	**324,330.13**	

Source: SPV, March 2026. Expropriation Plans.

Seymen, Çorlu
(53/1 – pasture parcel belonging to **Çorlu Municipality**)

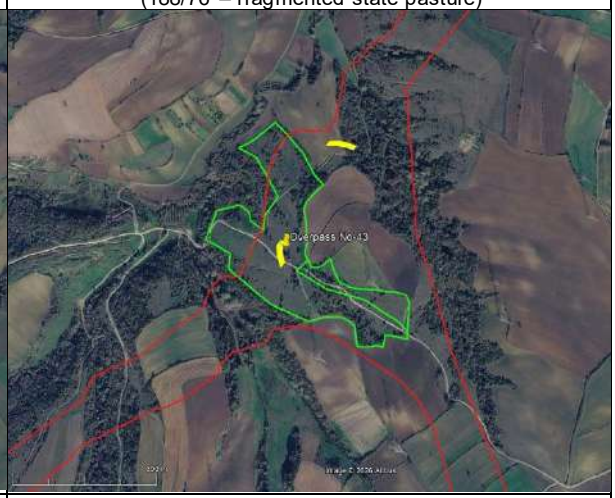


Seymen, Çorlu
(54/3 – pasture parcel belonging to **Çorlu Municipality**)

Marmaraereğlisi, Çeşmeli
(185/37 – fragmented state pasture)

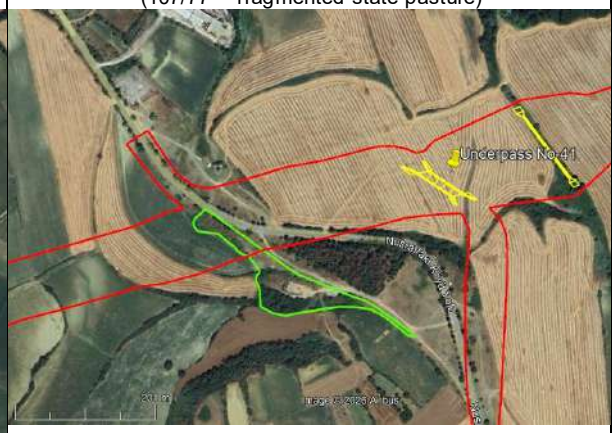
Marmaraereğlisi, Çeşmeli
(188/76 – fragmented state pasture)

Seymenli, Süleymanpaşa
(107/74 – fragmented state pasture)



Seymenli, Süleymanpaşa
(107/77 – fragmented state pasture)

Nusratfakı, Süleymanpaşa
(107/26 – fragmented state pasture)



Nusratfakı, Süleymanpaşa
(119/2 – state pasture)

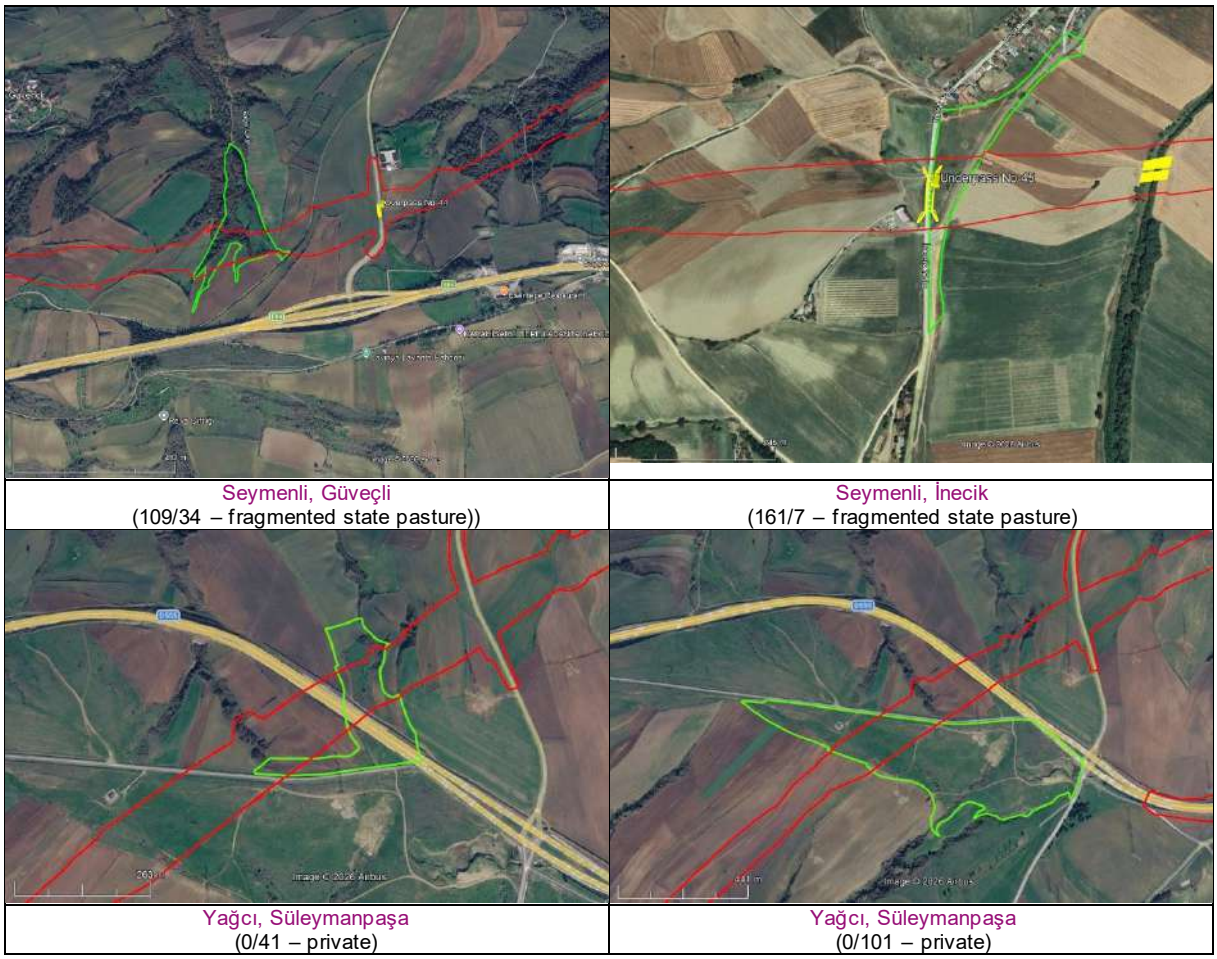


Figure 3-1. Examples of Legal Entity, State-owned and Private Pasture Parcels

3.1.1.2. State-owned – Forestry

Parcels registered as **forestry** are located in Section (KM 70 – 105), in **Süleymanpaşa** and **Malkara** districts, as listed in Table 3-7.

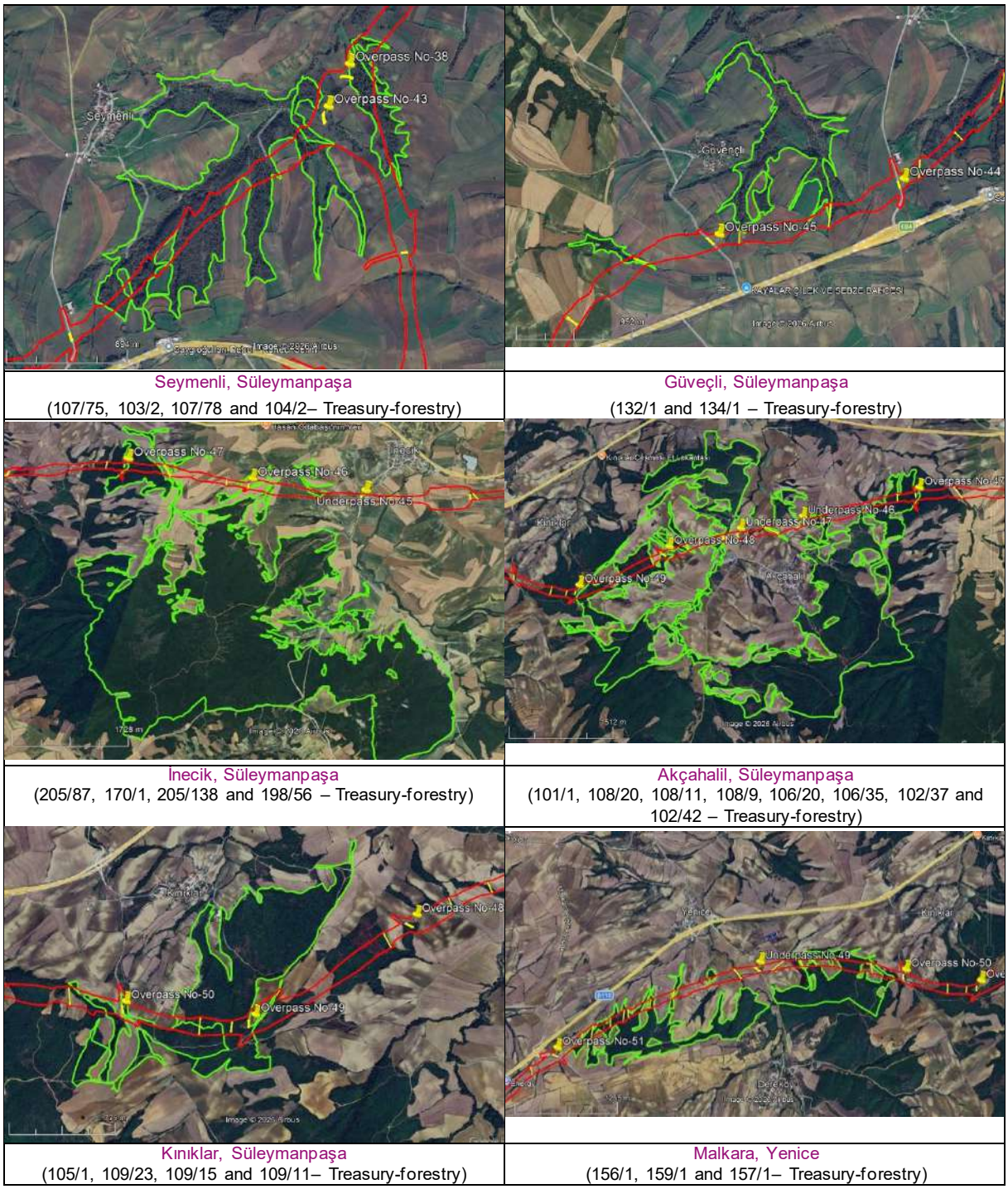
The potential use of forest areas by local communities for economic purposes, if any, have been consulted with the settlement heads as part of the RAP field surveys, as discussed in Section 5.2.3.3.9.

Table 3-7. Settlements with Affected Forest Parcels within the Motorway Expropriation Corridor

District	Neighbourhood	Affected Forest Parcels			
		Number of Parcels	Total Affected Forest Parcel Area (m^2)	Affected Forest Area (m^2)	% Affected Area
Süleymanpaşa	Seymenli	5	13,197,487.27	303,396.56	2.3
	Güveçli	2	477,860.65	8,527.97	1.8
	Karahisarlı	1	480,541.51	3,153.48	0.7
	İnecik	4	12,091,754.27	111,053.96	0.9
	Akçahalil	8	6,065,412.25	252,914.34	4.2
	Kınıklar	4	1,035,868.64	95,753.20	9.2
Malkara	Yenice	3	1,420,632.69	166,323.76	11.7
Total		**27**	**34,769,557.28**	**941,123.27**	

Source: SPV, March 2026. Expropriation Plans.

Figure 3-2 presents satellite image of the selected forest parcels overlapping with the expropriation corridor.



Seymenli, Süleymanpaşa (107/75, 103/2, 107/78 and 104/2– Treasury-forestry)	Güveçli, Süleymanpaşa (132/1 and 134/1 – Treasury-forestry)
İnecik, Süleymanpaşa (205/87, 170/1, 205/138 and 198/56 – Treasury-forestry)	Akçahalil, Süleymanpaşa (101/1, 108/20, 108/11, 108/9, 106/20, 106/35, 102/37 and 102/42 – Treasury-forestry)
Kınıklar, Süleymanpaşa (105/1, 109/23, 109/15 and 109/11– Treasury-forestry)	Malkara, Yenice (156/1, 159/1 and 157/1– Treasury-forestry)

Figure 3-2. Examples of Forest Parcels Affected within the Motorway Expropriation Corridor

3.1.2. Orphan Lands

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

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

In the case of agricultural lands, partial expropriation may give rise to two distinct impacts. The first, as also stipulated in the Expropriation Law, is **loss of value**; the second is **loss of income**. While the Expropriation Law subsumes both impacts under the single term "loss of value," in practice they are distinguished. A reduction in the value of the land, even though its net income remains unchanged, can be explained by a change in the capitalisation rate. Conversely, when the capitalisation rate remains constant, but the net income decreases as a result of partial expropriation, the impact is characterised as loss of income.

The distribution of private parcels by remaining area after expropriation is provided in Table 3-8.

Table 3-8. Distribution of Private Parcels by Remaining Area After Expropriation

Remaining Area after Expropriation (m^2)	Section 1		Section 2		Section 3	
	Number of parcels	Ratio (%)	Number of parcels	Ratio (%)	Number of parcels	Ratio (%)
0	247	23.13	139	18.53	61	13.93
0-100	0	0.00	1	0.13	0	0.00
101 – 200	4	0.37	6	0.80	0	0.00
201 – 500	20	1.87	47	6.27	2	0.46
501 – 750	20	1.87	12	1.60	1	0.23
751 –1,000	34	3.18	8	1.07	4	0.91
1,001 – 2,000	84	7.87	34	4.53	22	5.02
2,001 – 5,000	154	14.42	115	15.33	57	13.01
5,001 – 10,000	233	21.82	107	14.27	72	16.44
>10,001	272	25.47	281	37.47	219	50.00
Total	**1,068**	**100.00**	**750**	**100.00**	**438**	**100.00**

Note: Colour is used for visual emphasis only.

In accordance with Project's avoidance strategy and following a proactive approach, the expropriation boundary for the Project has been established with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use – either due to its limited size or its unsuitable geometry – **the boundary has been revised to encompass the entire parcel** or the unacquired unviable part of an affected parcel. To this end, a parcel-based review and assessment covering the full alignment was carried out by KGM – KÖSOB and the valuation contractor. Examples of avoidance and minimisation achieved through revision of the expropriation corridor boundaries to include the unviable, unacquired portions of the affected parcels within the expropriation area was previously presented in Figure 2-9. As can be seen in Table 3-8, the number of parcels with remaining areas of less than 500 m² is quite limited according to the expropriation plans, indicating the effectiveness of the design in avoiding and minimising orphan land.

It should be noted that there is no formally defined threshold or criteria for eligibility of orphan land to acquisition under the Expropriation Law or in KGM's procedures. However, practical approaches are applied by the directorates. The practice adopted by KÖSOB for this Project has been clarified during the RPF meeting held with KÖSOB in December 2025. According to KÖSOB, in case of orphan lands, **remaining areas of up to 500 m²** are taken into consideration, and such parcels can be acquired where deemed necessary. These parcels are assessed together with their adjacent parcels. Parcels exceeding 500 m² but considered irregular in shape may also be subject to acquisition. At the same time, there are cases where parcels below 500 m² have not been acquired as parcel specific assessments concluded that the remaining areas are economically viable. While assessments are carried out on a parcel-specific basis, 500 m² is applied as a project-specific threshold value in the evaluation of remaining parcel areas.

The **list of orphan private and public-legal entities lands** that are below 500 m² (over 1 m²) is provided in Table 3-9 and Table 3-10, respectively.

Table 3-9. List of Orphan Private Lands with Remaining Area less than 500 m²

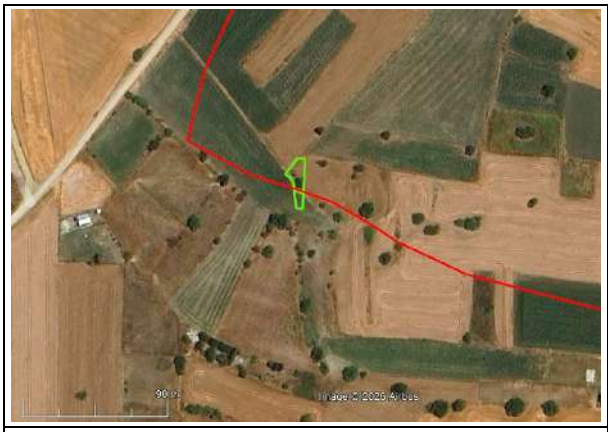
Section	District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m²)	Expropriated Area (m²)	Remaining Area (m²)
Section 1 (KM 0 – 35)	Silivri	1	Çeltik	173	102	Agricultural	1,417.70	951.26	466.44
		2	Çeltik	183	13	Agricultural	5,323.96	4,846.28	477.68
		3	Sancaktepe	233	71	Agricultural	1,238.73	991.49	247.24
		4	Sancaktepe	233	90	Agricultural	1,506.36	1,130.13	376.23
		5	Sancaktepe	233	74	Agricultural	1,353.50	943.47	410.03
		6	Sancaktepe	233	85	Agricultural	1,978.20	1,506.72	471.48
		7	Sancaktepe	233	79	Agricultural	823.46	534.01	289.45
		8	Sancaktepe	232	26	Agricultural	618.49	414.69	203.80
		9	Sancaktepe	232	17	Agricultural	1,982.27	1,630.94	351.33
		10	Sancaktepe	131	40	Agricultural	527.98	203.49	324.49
		11	Sancaktepe	131	23	Agricultural	770.38	326.66	443.72
		12	Balaban	732	155	Agricultural	444.63	58.85	385.78
		13	Balaban	732	153	Agricultural	673.58	375.19	298.39
		14	Balaban	732	152	Agricultural	647.47	417.78	229.69
		15	Balaban	732	151	Agricultural	786.98	540.81	246.17
		16	Balaban	732	150	Agricultural	1,655.33	1,332.30	323.03
		17	Balaban	732	149	Agricultural	708.26	534.25	174.01
		18	Balaban	732	148	Agricultural	991.62	811.78	179.84
		19	Balaban	732	122	Agricultural	1,338.51	1,121.36	217.15
		20	Balaban	732	125	Agricultural	1,101.52	742.35	359.17
		21	Balaban	732	128	Agricultural	251.50	63.06	188.44
		22	Balaban	734	118	Agricultural	1,342.22	951.02	391.20
		23	Balaban	734	100	Agricultural	427.50	221.42	206.08
	Marmaraereğlisi	24	Cedit Ali Paşa	353	39	Agricultural	13,400.00	13,231.54	168.46
Section 2 (KM 35 – 70)	Süleymanpaşa	25	Gazioğlu	0	682	Meadow	411.00	64.17	346.83
		26	Gazioğlu	0	683	Agricultural	415.00	143.17	271.83
		27	Gazioğlu	0	684	Meadow	419.00	219.94	199.06
		28	Gazioğlu	0	685	Meadow	414.00	295.85	118.15
		29	Gazioğlu	0	707	Meadow	427.00	311.68	115.32
		30	Gazioğlu	0	708	Meadow	426.00	284.37	141.63
		31	Gazioğlu	0	709	Meadow	448.00	251.85	196.15
		32	Gazioğlu	0	710	Meadow	416.00	208.79	207.21
		33	Gazioğlu	0	711	Meadow	428.00	181.92	246.08
		34	Gazioğlu	0	712	Meadow	427.00	139.86	287.14
		35	Gazioğlu	0	713	Meadow	410.00	114.51	295.49
		36	Gazioğlu	0	714	Meadow	450.00	74.31	375.69
		37	Gazioğlu	0	715	Meadow	444.00	48.67	395.33
		38	Gazioğlu	0	716	Meadow	494.00	19.13	474.87
		39	Gazioğlu	0	1118	Urban Plot	424.00	306.93	117.07
		40	Gazioğlu	0	1117	Urban Plot	446.00	244.09	201.91
		41	Gazioğlu	0	1116	Urban Plot	448.00	203.77	244.23
		42	Gazioğlu	0	1115	Urban Plot	448.00	193.57	254.43
		43	Gazioğlu	0	1114	Urban Plot	458.00	183.79	274.21
		44	Gazioğlu	0	1113	Urban Plot	456.00	184.99	271.01
		45	Gazioğlu	0	1112	Urban Plot	451.00	170.78	280.22
		46	Gazioğlu	0	1111	Urban Plot	446.00	166.79	279.21
		47	Gazioğlu	0	1110	Urban Plot	456.00	155.91	300.09
		48	Gazioğlu	0	1109	Urban Plot	401.00	153.36	247.64
		49	Gazioğlu	0	1108	Urban Plot	451.00	146.38	304.62
		50	Gazioğlu	0	1107	Urban Plot	444.00	141.31	302.69

Section	District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m^2)	Expropriated Area (m^2)	Remaining Area (m^2)
		51	Gazioğlu	0	1106	Agricultural	410.00	132.70	277.30
		52	Gazioğlu	0	1105	Urban Plot	419.00	125.65	293.35
		53	Gazioğlu	0	1104	Urban Plot	407.00	121.32	285.68
		54	Gazioğlu	0	1103	Urban Plot	430.00	127.10	302.90
		55	Gazioğlu	0	1102	Urban Plot	404.00	113.56	290.44
		56	Gazioğlu	0	1101	Agricultural	399.00	109.11	289.89
		57	Gazioğlu	0	1100	Urban Plot	402.00	101.89	300.11
		58	Gazioğlu	0	1099	Urban Plot	375.00	94.00	281.00
		59	Gazioğlu	0	1098	Urban Plot	390.00	92.30	297.70
		60	Gazioğlu	0	1097	Urban Plot	380.00	80.81	299.19
		61	Gazioğlu	0	1096	Urban Plot	380.00	78.61	301.39
		62	Gazioğlu	0	1095	Urban Plot	380.00	71.35	308.65
		63	Gazioğlu	0	1094	Urban Plot	375.00	60.32	314.68
		64	Gazioğlu	0	1093	Urban Plot	380.00	55.77	324.23
		65	Gazioğlu	0	1092	Urban Plot	380.00	49.71	330.29
		66	Gazioğlu	0	1091	Urban Plot	385.00	34.21	350.79
		67	Gazioğlu	0	1090	Urban Plot	366.00	11.00	355.00
		68	Köseilyas	0	1005	Agricultural	10,972.88	10,693.14	279.74
		69	Gündoğdu	200	28	Agricultural	2,879.70	2,643.13	236.57
		70	Gündoğdu	200	93	Agricultural	2,112.97	1,756.31	356.66
		71	Gündoğdu	200	103	Agricultural	2,175.02	1,732.02	443.00
		72	Gündoğdu	200	51	Agricultural	9,211.87	9,132.83	79.04
		73	Gündoğdu	200	57	Vineyard	1,792.83	1,543.54	249.29
		74	Gündoğdu	200	53	Agricultural	1,685.89	1,377.04	308.85
		75	Gündoğdu	197	88	Agricultural	2,823.24	2,410.68	412.56
		76	Gündoğdu	196	28	Vineyard	2,305.46	1,949.87	355.59
		77	Kayı	0	1491	Agricultural	5,020.25	4,577.98	442.27
		78	Kayı	0	1131	Agricultural	5,000.00	4,528.75	471.25
Section 3 (KM 70 – 105)		79	Seymenli	107	71	Agricultural	670.45	310.32	360.13
		80	Akçahalil	106	29	Agricultural	2,306.23	1,913.87	392.36

Table 3-10. List of Orphan Public and Legal Entities Lands with an Area less than 500 m^2

Section	District	No	Settlement	Lot	Parcel	Parcel Type	Parcel Area (m^2)	Expropriated Area (m^2)	Remaining Area (m^2)
Section 1 (KM 0 – 35)	Silivri	1	Sancaktepe	233	59	Agricultural	805.62	325.18	480.44
		2	Sancaktepe	233	53	Agricultural	740.82	489.10	251.72
		3	Balaban	756	77	Agricultural	234.83	155.25	79.58
		4	Balaban	756	75	Agricultural	484.97	48.20	436.77
	Marmaraereğlisi	5	Yakuplu	202	49	Fuel Line	578.42	232.47	345.95
	Çorlu	6	Şahpaz	0	1170	Fuel Line	1,008.00	615.70	392.30
Section 2 (KM 35 – 70)	Süleymanpaşa	7	Kayı	0	1111	Pasture	1,000.00	590.69	409.31
		8	Kayı	0	1596	Phylon Location	76.01	50.97	25.04
		9	Zafer	344	253	Railway	3,796.17	3,667.30	128.87
		10	Zafer	344	262	Railway	584.05	294.38	289.67
		11	Aydoğdu	325	450	Railway	553.73	222.73	331.00
Section 3 (KM 70 – 105)		12	Nusratlı	0	1122	Agricultural	350.00	331.16	18.84
		13	Nusratlı	0	1166	Fuel Line	40.00	7.50	32.50
		14	Nusratfakı	118	24	NATO Pipeline	2,176.22	1,722.56	453.66

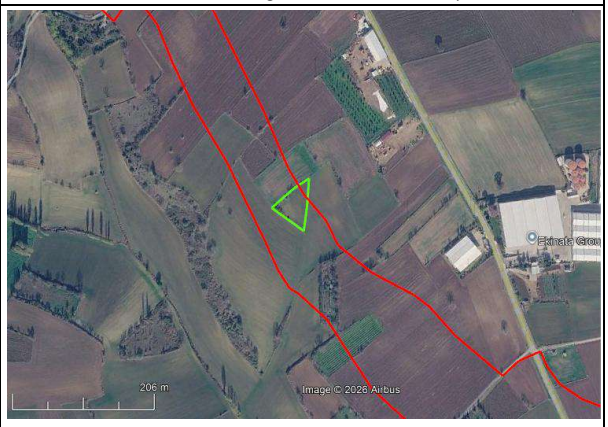
Examples of orphan parcels are presented in Figure 3-3.



Balaban, Silivri
(732/128– Private –
agricultural land with remaining area of 188.44 m^2)

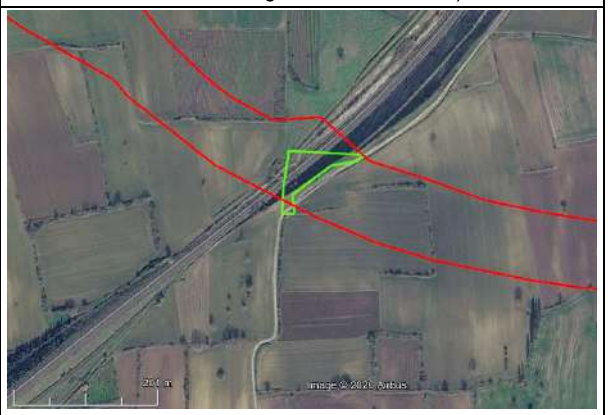
Kayı, Süleymanpaşa
(0/1111 – Common property
with remaining area of 409.31 m^2)

Gazioğlu, Süleymanpaşa
(0/1118–Private - urban plot
with remaining area of 117.07 m^2)



Gündoğdu, Süleymanpaşa
(196/28 – Private- vineyard
with remaining area of 355.59 m^2)

Balaban, Silivri
(756/77– Treasury agricultural land
with remaining area of 79.58 m^2)



Zafer, Süleymanpaşa
(344/253 – Legal Entities – railway
with remaining area of 128.87 m^2)

Figure 3-3. Examples of Orphan Parcels

Technical Assessment on Net Income Loss Calculation Arising from Restricted Access to Orphan Parcels

As part of the RAP, a technical assessment titled **"Net Income Loss Calculation Arising from Restricted Access to Residual Parcels "** has been prepared by the Senior Expropriation and Valuation Consultant of the RAP Team, as presented in Appendix B.

This study examines the recurring net income losses incurred by owners and users of agricultural residual parcels where motorway alignment requires longer access routes via underpasses and overpasses.

Using 2025 wheat production data published by the Silivri District Directorate of Agriculture and Forestry and typical fuel cost assumption rates, the methodology calculates additional access costs per agricultural production cycle. The findings indicate that proportional income losses become material (above the 10% threshold) primarily for **residual parcels of less than 2 da** where additional access distances reach **2 km or more**.

Based on the assessment findings, a dedicated, parcel-specific investigation is required to be undertaken to determine the actual income loss compensation payable. The figures presented are explicitly intended as an order-of-magnitude estimate to inform the RAP fund (for the budget item "Compensation for Value or Income Loss for Orphan Lands" as given in Table 16-1), based on straight-line chainage distances and wheat production alone. For the purposes of determining the actual compensation amounts, a more accurate calculation is required to be conducted on the basis of household survey data collected from the affected area, taking into account real (rather than straight-line) access routes and the prevailing wheat – sunflower crop rotation.

Management of Impacts on Orphan Lands

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.

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), key specificities to consider regarding the severance and orphan lands are described as follows: "*…address orphan land and severance, either on a claim basis or proactively. Prepare objective criteria to review orphan land claims and make sure these are disseminated to potentially affected landowners and land users*".

Considering the provisions of national legislation and the practices recommended by IFC, along with the linear nature and scale of the Project and the number of private parcels affected, the SPV has determined that adopting a **claim-based methodology** is feasible for this Project. Accordingly, during Project implementation, the SPV will implement the SEP, including the grievance mechanism, and will maintain ongoing engagement with the affected people, including users of orphan parcels. Economic displacement impacts arising from such orphan lands will be monitored by the SPV throughout RAP implementation, relevant requests submitted by landowners to KGM through petitions will be periodically reviewed by the SPV as part of the Project's grievance mechanism and any related grievances or losses will be managed primarily on a claim basis, and case-specific corrective actions will be developed and implemented by the SPV, where necessary. This approach will be operationalised through the Project's grievance mechanism.

The **methodology and criteria** for review and assessment of cases/claims related to loss of value and/or loss of income by the Project will be as follows:

1) Parcel Integrity: Examine whether the expropriated part has caused any land modification that disrupts the integrity of the parcel.

2) Land Fragmentation: Investigate whether the land has been divided into multiple parts to the extent that its integrity is completely lost.

3) Change in the Land Structure or Characteristics: Examine whether there is any change in the structure or characteristics of the remaining land (e.g. irrigated land turning into dry farmland; a parcel previously adjacent to a registered road no longer having direct access; or the remaining part having a different topographic structure compared to the expropriated portion).

4) Access: Review on maps whether access to the remaining parcel imposes any additional cost on the landowner (the most common example being fuel cost).

In case any of the above four issues are identified through this review, a field survey will be carried out by a third-party valuation expert to confirm the findings, and the significance of the issues will be assessed, and the actions to be taken by the SPV to mitigate potential impacts as part of a detailed assessment will be determined by the SPV, where necessary with support from third-party consultants specialised in valuation.

The methodology to be followed for the field surveys and criteria to be considered as part of the detailed assessment are outlined below:

- **Loss of road access:** If the parcel was adjacent to a cadastral (official) road before expropriation, but the remaining part has no access to a cadastral road and is surrounded by other parcels afterwards, the loss of value will be calculated by using the *net income method*, and/or through analysis of land purchase and sale prices in the vicinity:
    - In the *net income method*, the crop rotation and capitalization rate included in the valuation report for the parcel will be considered. Since the remaining part no longer has road access, demand for the land may decrease – in other words, the capitalisation rate may increase. Therefore, by increasing the capitalisation rate applied in the valuation of the expropriated part by 0.5 to 1 point, the difference between the recalculated unit value and the expropriation unit value would represent the loss of value.
    - Alternatively, when local sales data or prices demanded for land are collected for parcels adjacent to cadastral roads and those without road access, the average difference between them will be considered as the loss of value.

  To obtain more reliable results and ensure cross-verification, noting both methods will be used where possible.
- **Topographic differences:** If the remaining parcel has a different topographic structure compared to the expropriated part (e.g. a steeper slope), the *net income method* will be applied to calculate the loss of value. In this case, the capitalisation rate used in the valuation of the expropriated part is increased by 0.5 to 1 point, and the difference between the recalculated unit value and the expropriation unit value would represent the loss of value.
- **Loss of irrigation capacity:** If a parcel that was irrigable before expropriation becomes economically non-irrigable or no longer irrigable, the difference between the unit value calculated with the crop rotation and capitalisation rate applied for irrigated land and the unit value calculated with those applied for dry farmland would represent the loss of value per unit.
- **Parcels too small for cultivation:** Whether the remaining parcel has become too small to allow agricultural production can only be determined through field surveys. Based on the common crop rotations in the region, cultivation practices, production costs, number of trips required to the parcel, etc., the size (in m²) at which net income becomes zero is identified. For example, if it is found that parcels smaller than 500 m² generate zero net income (i.e. revenues equal expenses), this indicates that the remaining part should also be expropriated. However, this is not limited to parcels below 500 m²; even larger parcels may still experience income losses. Within this scope, income losses will also be determined for parcels located opposite to the landowner's main plot, where access becomes more costly due to underpasses or overpasses.

1/1,000-scale Zoning Plan Implementation

The settlements affected by the Motorway's land acquisition and that fall within 1/1,000-scale zoning plan implementation areas are discussed in Section 2.6.5.

If a parcel remains within the municipality's 1/1000 implementation plan area and road dedications have not yet been carried out (i.e. Article 18 land readjustment has not yet been implemented), it is anticipated that parcel owners will not be adversely affected by the remaining land after expropriation, as the relevant municipality will undertake the Article 18 land readjustment following the expropriation. A ruling of the 5th Civil Chamber of the Court of Cassation (E.2002/2825, K.2002/9465) states that "*the remaining portion of a cadastral parcel that has not yet been transformed into a zoning parcel will be evaluated together with other parcels during the readjustment process and therefore will not suffer any loss in value*".

According to Article 13 of the BOT Contract, necessary upper and lower scale zoning plan and zoning plan amendments will be made by the SPV according to the approved Project. Consequently, orphaned portions of private parcels – i.e., the remaining parts of expropriated parcels – located within the 1/1,000 zoning plan implementation area will be addressed through the zoning plan implementation, which will be carried out by the respective municipalities.

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

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

- Right to Apply for Remaining Parcel Acquisition:

  For unacquired portions not previously included in the expropriation, owners/shareholders have the right to submit an official application to KGM to request acquisition of the remaining, unusable portion of the expropriated parcel. As per the Expropriation Law, KGM reviews such applications in line with its criteria for unviable land acquisition of agricultural orphan lands. Further details on the applicable process under the Expropriation Law, **including the relevant application timeframe**, are provided in Section 2.7.

- Legal Remedy and Support by SPV:

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

- Revisions to Zoning Plans for Large Infrastructure Projects:

  Even if parcels have undergone adjustment under Article 18 of the Zoning Law ("*uygulama görmüş*"), the zoning plan amendment process may allow evaluation of orphan parcels within revised zoning plans, with potentially for enabling allocation of replacement lands or shares to affected owners/shareholders in certain cases. Such cases will be monitored under the RAP, and each issue will be managed individually in consultation with the Lenders and their LESA (see Chapter 13 on Monitoring and Reporting).

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

- Zoning Plan Execution Pending:

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

- Right to Apply to KGM:

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

Information of PAPs

The information on PAPs' legal rights and entitlements under RAP will be disseminated to potentially affected by the SPV through the distribution of GLAC and during consultation meetings being organised by SPV prior to and during Article 8 negotiation meetings.

Final Assessment and Action by SPV, where necessary

During the RAP implementation, the SPV, with support from the EPC's Expropriation Team, will review orphan parcels and identify their owners and agricultural users on a parcel-by-parcel basis, in line with the expropriation and construction programmes. The owner(s) of the affected parcel has the right to officially apply to KGM and request acquisition of the remaining part of the expropriated parcel. The SPV will provide assistance to PAPs in preparing official applications to KGM, where requested by the PAPs. In case the acquisition request of the owner/ shareholders is not concluded positive by KGM, the owner(s) of the affected parcel has the right to apply to courts. In cases where agreement cannot be reached, under Article 10 process, court-appointed valuation experts assess the impacts of orphan land and, where deemed necessary, the court awards compensation for diminution in value. Based on the review of court decisions (Article 10 or Article 27 where this is applicable), and in coordination with KGM, the SPV, with support from the EPC's Expropriation Team, will monitor the requests submitted by landowners to KGM through formal petitions, the outcomes of KGM's review and any resulting actions (e.g. official responses issued by KGM to formal requests or other actions taken by KGM, where applicable), and compensation awarded by the courts for such impacts under the official expropriation procedures. Accordingly, the SPV will review and assess the outcomes of the completed official procedures, taking into account any grievances received through the Project's Grievance Mechanism, and, where necessary, develop and implement parcel based corrective actions (e.g. provision of compensation for the unacquired portion of a parcel where the remaining land is determined to be economically unviable or unsuitable for development, additional land acquisition proposal to KGM, etc.).

3.1.3. Fragmented Parcels

As a result of expropriation, some parcels become **fragmented** into two or more sections, with the Motorway crossing between them. The leftover sections of fragmented parcels may also be considered orphan lands, depending on the size of the residual area, as described above.

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

Specific to this Project, the SPV has developed a **Severance Management Plan (SEVMP)** to ensure the effective integration of underpasses and overpasses into the Project and accordingly mitigate the economic and access severance impacts associated with the development of the Motorway. The Plan sets out the methodology for identifying the optimal locations for these crossings, ensuring they are strategically positioned to maximise their effectiveness. It also outlines community engagement strategies focused on severance management throughout the Project lifecycle and provides measures for managing any residual severance impacts.

The LESA has confirmed that the SEVMP complies with the applicable standards and approved the Plan in October 2025. The SEVMP has been disclosed[48] by the SPV on the Project website in Turkish and English. It will be implemented by the SPV in accordance with ESAP Item 5.5, as outlined in the Plan, have been achieved.

The SEVMP defines the following general measures to be implemented by the SPV in accordance with the Plan, with additional measures to mitigate economic severance and disproportionate impacts on vulnerable people:

- The Project will conduct broad consultations with the Project-Affected Persons (PAPs), affected communities, and other interested stakeholders. Detailed visual materials and KMZ files of the route will be shared with local communities to gather their feedback, particularly regarding underpasses in settlements and potential barriers to access ecosystem services. Their input will be incorporated into the further detailed design and mitigation measures of the Project.
- Safe pedestrian crossings will be designated with clearly marked pathways, adequate lighting, and, where feasible, pedestrian overpasses or underpasses.
- Strategically located crossings (overpasses or underpasses) will be planned and constructed at intervals that allow easy access to ecosystem services, lands, and other essential resources.

[48] Turkish: https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-bolunmesi-yonetim-plani.pdf; English: cok-severance-management-plan.pdf

- In order to assess and eliminate potential hazards regarding the use of underpasses and overpasses built for traffic, pedestrians, and livestock, the following measures will be implemented:
  - Regular checks will be conducted for visibility, lighting, and drainage issues, particularly after heavy rainfall.
  - Routine maintenance will be carried out to address lighting, drainage, and structural issues.
  - Safe interaction between vehicles, pedestrians, and livestock will be monitored and managed.

Regarding the assessment of access restrictions, the parcels fragmented due to the Project, as well as the number, distribution, and adequacy of the engineering (crossing) structures in ensuring that residents can access the opposite side of the Motorway, have been evaluated as part of the RAP studies. It has been confirmed that the engineering structures and their locations have been designed, to the extent possible, to prevent access restrictions to fragmented lands. Table 3-11 presents the list of fragmented parcels identified and reviewed as part of RAP, including information on the nearest crossing structures and their respective distances from the fragmented parcels.

The full list of underpasses, overpasses, and culverts incorporated into the Project design to ensure land users' access to their lands is provided in Appendix A.

Examples of fragmented parcels and the locations of the closest crossing structures are provided in Figure 3-4.

Table 3-11. List of Fragmented Parcels (*)

No	Settlement	Motorway KM	Motorway Section	Parcel No.	Parcel Type	Ownership Type	Parcel Area (m²)	Total Expropriated Area (m²)	Remaining Area (m²)		Nearest Crossing Structure	Approximate Distance to the Structure (m)
									Right	Left		
Section 1												
İstanbul-Silivri												
1	Çeltik	3+640	Main Road	173/99	Agricultural	Private	3,108.35	1,944.37	586.30	577.68	Underpass No-6	182.50
2	Çeltik	3+645	Main Road	173/100	Agricultural	Private	2,696.36	1,638.23	705.34	352.79	Underpass No-6	187.50
3	Çeltik	3+646	Main Road	173/98	Agricultural	Private	2,800.38	1,760.30	418.23	621.85	Underpass No-6	188.50
4	Çeltik	5+749	Main Road	184/78	Agricultural	Private	17,375.40	5,677.47	10,885.34	812.59	Overpass No-2	669.76
5	Değirmenköy	10+068	Main Road	463/80	Agricultural	Private	22,615.01	14,262.98	7,427.10	924.93	Overpass No-5	232.17
6	Değirmenköy	10+561	Main Road	462/62	Agricultural	Private	4,937.31	1,689.43	2,383.13	864.75	Overpass No-5	260.83
7	Değirmenköy	10+760	Main Road	462/53	Agricultural	Private	6,000.46	1,222.66	788.20	3,989.60	Overpass No-6	264.64
8	Değirmenköy	10+777	Main Road	462/52	Agricultural	Private	5,928.24	1,247.89	726.54	3,953.81	Overpass No-6	247.64
9	Değirmenköy	10+790	Main Road	462/51	Agricultural	Private	10,818.96	2,071.41	947.94	7,799.61	Overpass No-6	234.64
Tekirdağ-Çorlu												
10	Seymen	18+423	Main Road	105/22	Agricultural	Private	18,742.42	9,634.31	8,305.59	802.52	Underpass No-16	700.00
11	Seymen	21+585	Main Road	94/12	Agricultural	Private	6,067.43	4,244.32	1,120.27	702.84	Overpass No-10	1,500
12	Şahpaz	27+388	Main Road	0/989	Agricultural	Private	44,600.00	18,247.19	925.01	25,427.80	Overpass No-17	673.88
Tekirdağ-Marmaraereğlisi												
13	Yakuplu	24+020; 1+115	Corlu Airport Connection	207/72	Agricultural	Private	5,354.37	2,277.17	780.23	5,296.97	Overpass No-16	176.28
Section 2												
Tekirdağ-Süleymanpaşa												
14	Husunlu	45+942	Main Road	0/597	Agricultural	Private	34,800.00	6,361.59	27,648.09	790.32	Overpass No-24	1,218.00
15	Gazioğlu	52+007	Main Road	0/425	Agricultural	Private	24,200.00	17,738.24	5,495.27	966.49	Underpass No-30	157.00
16	Köseilyas	54+759	Main Road	0/967	Agricultural	Private	17,925.85	12,252.98	345.41	5,327.46	Underpass No-31	197.40
17	Köseilyas	55+631	Main Road	0/1079	Agricultural	Private	35,800.00	18,430.35	904.68	16,464.97	Underpass No-32	637.00
18	Gündoğdu	56+636	Main Road	200/109	Agricultural	Private	11,230.00	6,694.13	4,223.93	311.94	Underpass No-32	368.00
Section 3												
Tekirdağ-Süleymanpaşa												
19	Seymenli	71+948	Main Road	107/2	Agricultural	Private	22,886.40	10,177.18	507.82	12,201.40	Underpass No-38	244.88

No	Settlement	Motorway KM	Motorway Section	Parcel No.	Parcel Type	Ownership Type	Parcel Area (m²)	Total Expropriated Area (m²)	Remaining Area (m²)		Nearest Crossing Structure	Approximate Distance to the Structure (m)
									Right	Left		
20	Güveçli	76+449	Main Road	109/43	Agricultural	Private	14,964.23	9,445.38	4,578.71	940.14	Overpass No-44	719.24
21	Güveçli	78+047	Main Road	134/1	Forest	Treasury	37,917.09	5,407.51	31,620.35	889.19	Underpass No-39	589.00
22	Nusratfakı	81+068	Main Road	118/25	Agricultural	Private	79,746.20	20,437.24	529.02	58,779.94	Underpass No-41	818.25
23	İnecik	85+472	Main Road	205/95	Agricultural	Private	15,934.03	10,512.52	716.19	4,705.32	Underpass No-45	519.30
24	Akçahalil	89+289	Main Road	108/36	Agricultural	Private	29,139.83	13,782.29	530.22	14,827.32	Overpass No-47	741.90
25	Akçahalil	89+760	Main Road	108/28	Agricultural	Private	47,374.39	29,484.72	17,212.84	676.83	Underpass No-46	544.51
26	Akçahalil	91+854	Main Road	102/34	Agricultural	Private	9,495.58	3,378.93	402.16	5,714.49	Underpass No-48	441.90
27	Akçahalil	91+890	Main Road	102/33	Agricultural	Private	14,416.06	4,569.38	857.42	8,989.26	Underpass No-48	477.90
28	Kınıklar	94+221	Main Road	109/23	Forest	Treasury	116,587.42	34,085.38	803.51	81,698.53	Overpass No-50	457.44
Tekirdağ-Malkara												
29	Yenice	95+957	Main Road	115/1	Agricultural	Private	11,117.15	8,113.73	2,053.20	950.22	Underpass No-49	614.14
30	Yenice	96+998	Main Road	125/9	Agricultural	Private	49,149.49	17,294.34	822.30	31,032.85	Underpass No-49	426.86
31	Ahievran	102+715	Main Road	0/338	Agricultural	Private	5,750.00	4,290.96	622.63	836.41	Underpass No-451	1,003.04

(*) Parcels fragmented in such a way that at least one adjacent side (right or left) is under 1,000 m² have been taken into consideration.

Yakuplu, Marmaraereğlisi	Akçahalil, Süleymanpaşa
(207/72– agricultural land with right side remaining area of 780.23 m²)	(108/28– agricultural land with left side remaining area of 676.83 m²)

Figure 3-4. Examples of Fragmented Parcels and Closest Crossing Structures

Fragmentation of Pasture Parcels

The fragmentation of pasture parcels used by local communities for grazing purposes – regardless of the size of the area remaining on the right or left side of the Motorway – may result in severance impacts. There are nine registered fragmented pasture parcels and one meadow identified along the route.

As presented in Table 3-12, overpasses and underpasses have been incorporated into the design in consideration of the location of fragmented pastures, in order to mitigate potential impacts on pasture users.

Table 3-12. List of Fragmented Pasture Parcels

No	Settlement	KM	Parcel No.	Parcel Type	Ownership Type	Parcel Area (m²)	Total Exp. Area (m²)	Remaining Area (m²)		Nearest Crossing Structure	Approx. Distance to the Structure (m)
								Right	Left		
Section 1 (KM 0 – 35)											
Tekirdağ-Marmaraereğlisi											
1	Çeşmeli	30+086	188/76	Pasture	Common Property	657,080.03	51,019.41	129,098.88	476,961.74	Overpass No-19	0
2	Çeşmeli	30+506	185/37	Pasture	Common Property	355,809.13	34,104.53	62,228.06	259,476.54	Overpass No-19	0
Section 2 (35 – 70)											
Tekirdağ- Süleymanpaşa											
3	Yağcı	68+222	0/41	Pasture	Private	48,650.00	12,127.10	11,556.71	13,500.96	Overpass No-37	0
4	Yağcı	68+533	0/101	Pasture	Private	244,300.00	32,392.54	40,257.72	166,095.27	Overpass No-37	262.12
Section 3 (KM 70 – 105)											
Tekirdağ- Süleymanpaşa											
5	Seymenli	72+539	107/74	Pasture	Common Property	191,693.00	50,390.57	45,242.56	95,877.87	Overpass No-38	160
6	Seymenli	73+231	107/77	Pasture	Common Property	126,648.48	85,173.73	26,605.16	14,869.59	Overpass No-43	0
7	Güveçli	76+218	109/34	Pasture	Common Property	62,108.68	23,100.58	34,693.51	4,314.59	Overpass No-44	370
8	Nusratfakı	80+436	107/26	Pasture	Common Property	50,742.42	15,333.98	13,675.84	21,732.60	Underpass No-41	50
9	İnecik	82+981	156/20	Meadow	Common Property	166,450.99	63,430.10	38,027.11	64,993.78	Underpass-No-42 Underpass No-43	0
10	İnecik	84+867	161/7	Pasture	Common Property	30,672.84	7,976.45	18,763.33	3,933.06	Underpass No-45	0

Note: Colour is used for visual emphasis only.

Çeşmeli, Marmaraereğlisi
(KM 30+086 Parcel No.188/76– pasture
Nearest crossing structure is Overpass No-19)

Çeşmeli, Marmaraereğlisi
(KM 30+086 Parcel No.185/37– pasture
Nearest crossing structure is Overpass No-**19**)

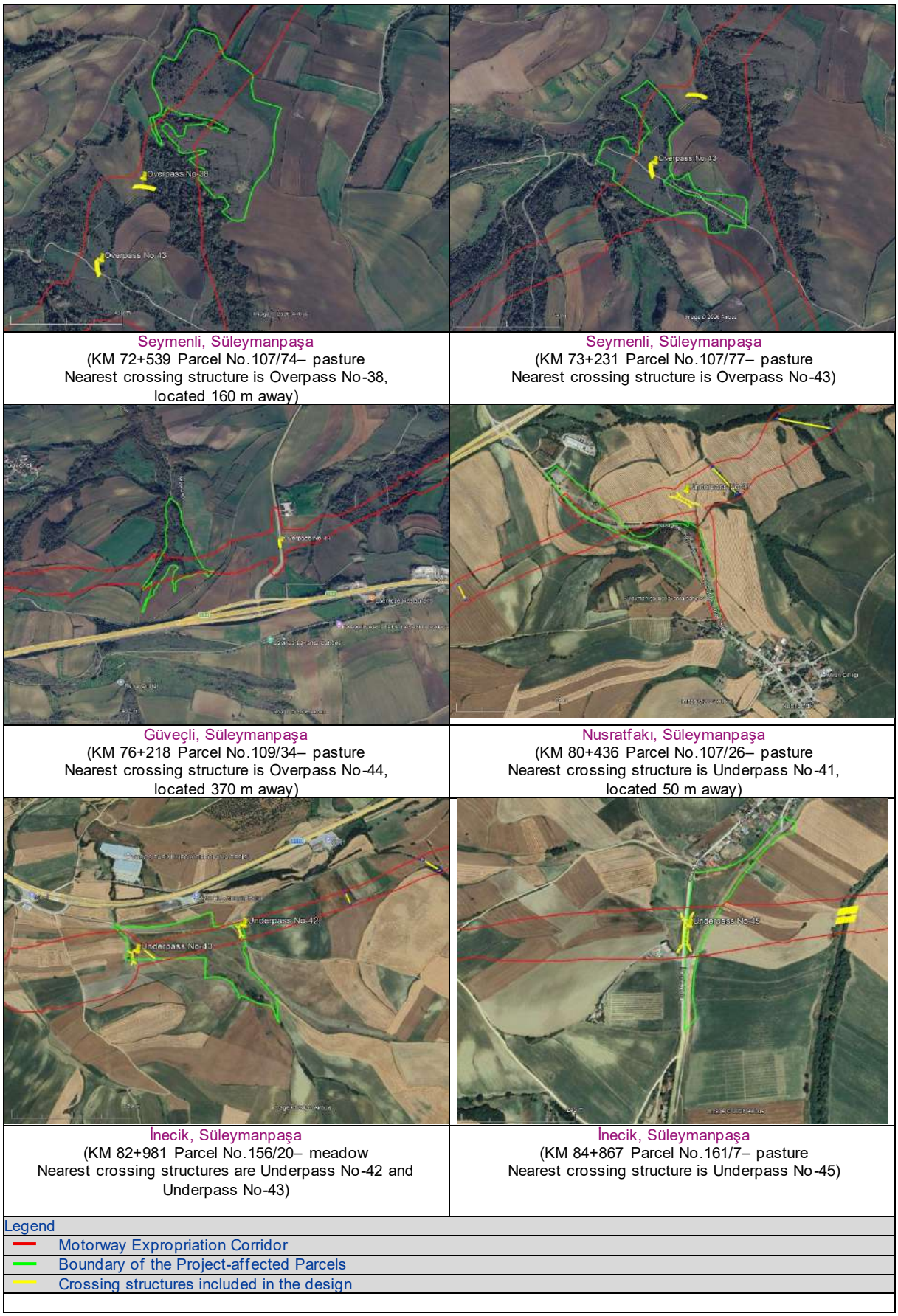


Figure 3-5. Fragmented Pasture Parcels

As outlined in Section 2.3.2, during Project implementation, the SPV, with KGM's approval, may provide additional structures within the expropriation corridor if needed – especially in response to requests from local communities, public authorities, or other stakeholders – to avoid land severance or restricted access resulting from the project. KÖSOB, during the RPF meeting held in December 2025, indicated that additional requests from local residents, such as culverts, overpasses or underpasses, can be submitted, and that such requests are reviewed and, where deemed feasible, incorporated into the Project planning.

Nevertheless, during Project implementation, the SPV will implement the grievance mechanism and maintain ongoing engagement with the affected people, including users of fragmented parcels, to identify and resolve any issues. With these measures in place, no individuals are expected to incur costs for services, assets or otherwise (i.e. firewood, medicine, feed for livestock) due to the Project.

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

3.1.4. Loss of Crops

Land acquisition for the Project may result in the loss of standing **crops cultivated before the completion of expropriation** if land entry occurs before the harvest has been completed.

Article 20 of the Turkish Expropriation Law stipulates that "***Vacating cultivated land is postponed until the harvest has been completed***. *In cases where it is not possible to wait for the harvest period, the expropriating administration may request that the land be vacated, provided that the crop value determined by the court is compensated. If the crop value has already been taken into consideration in the determination of the expropriation value in accordance with Articles 11 and 12 (of the Expropriation Law), it is not necessary to determine and pay this amount again for the vacating of the immovable property"*.

To minimise crop compensation costs, the SPV and EPC will schedule land entry on parcels expropriated through Article 8 or Article 10 (or parcels for which a land seizure decision has been obtained where Article 27 is applied) in coordination with local harvesting calendars, ensuring that affected landowners and users are able to complete the harvest of standing crops prior to site handover wherever practicable.

Where there is urgency in land entry and waiting for the end of the harvesting period is not feasible for the Project, **crop compensation will be calculated based on the most recent agricultural data** obtained from the provincial and district directorates of agriculture and forestry, together with field surveys conducted by the competent experts (e.g. valuation specialist, agricultural engineer, agricultural economist) to be assigned by the SPV to value the affected crops.

To avoid invalid crop compensation claims in the Project, the SPV and EPC personnel inform affected communities before and upon completion of expropriation about the timeline for land entry and construction. The Project clearly communicates that **any crops cultivated on the parcels expropriated through Article 8 or Article 27 (or parcels for which a land seizure decision has been obtained where Article 27 is applied) after the completion of expropriation will not be eligible for compensation**, in accordance with the principles of the Expropriation Law and the requirements of IFC PS5.

Where the construction schedule allows affected people to cultivate and harvest crops for an additional season after the completion of the expropriation process, the Project may, at its sole discretion, grant them the right to continue cultivation for a temporary period to be agreed. This will be individually and mutually agreed with the land users and the mutual agreement will be formally documented by the SPV, including the authorised cultivation period, to minimise the risk of unsubstantiated compensation claims arising from cultivation beyond the mutually agreed period.

For parcels in Section 3 (KM 70 – 105) expropriated by KGM, the Project has not implemented any restrictions until harvest in June 2026. From June 2026 onwards, the Project progressively commenced land entry on parcels for which the expropriation procedures had been completed under either Article 8 or Article 10, in line with the construction schedule, by informing land users, in consultation with the respective land users.

3.1.5. Loss of Trees and Perennial Crops

Fruit and non-fruit trees and perennial crops are present on parts of the affected parcels, including those that are privately owned and state-owned. The expropriation data and the valuation reports identify the affected trees and perennial crops for each affected private and public parcel, where applicable. According to KÖSOB (December 2025), **there are no commercial orchards** ("*kapama bahçe*") within the Motorway corridor. Tree species and ages vary significantly along the alignment, and there are no uniform orchards consisting solely of olive, walnut, or pomegranate trees. Parcels generally contain two or three different tree species.

In the case of Article 8 agreements, the list of trees and perennial crops considered in the valuation is noted in the purchase agreement protocols signed by the affected persons who reach an agreement with KGM on the expropriation price. In the case of Article 27 and/or Article 10 processes, the list of trees considered in the valuation is recorded in the relevant expert reports and court decisions, which are mostly accompanied by the PAPs. In case there is a conflict, either during counting or court process, PAPs have the right to approach to the court to challenge the quantity, type, size, age of the trees.

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

Table 3-13 summarises the number of trees and perennial crops affected by the Project within Motorway's expropriation corridor. Owners of the affected trees, whether formal or informal users of the land, will be eligible for compensation under the Expropriation Law; **if they are not eligible** under the Expropriation Law and are therefore not compensated by KGM, they will be eligible for compensation under the RAP.

Regarding tree cutting activities on forestry parcels, the Project engages with the relevant Forestry Operations Directorates. The authority plans and carries out these activities in accordance with the construction programme, in consultation with the Project.

Table 3-13. Affected Trees and Perennial Crops

Type of Tree	Quantity (Number)		
	Section 1	Section 2 (KM 58-60)	Section 3
Almond (*Badem*)	100	20	12
Apple (*Elma*)	78	10	
Apricot (*Kayısı*)	168	3	
Ash (*Dişbudak*)	3		
Austrian Pine (*Çam Mazı*)			34
Black Poplar (*Karaağaç*)	41	9	254
Cherry (*Kiraz*)	79	2	
Chestnut (*Kestane*)	2		
Cornel (*Kızılcık*)	3		
Cumquat (*Kumkuat*)	1		
Cypress (*Servi*)	8	88	
Fig (*İncir*)	167	31	
Grapevine (*Asma*)	211	433	3,738
Hazelnut (*Fındık*)	8	9	
Japanese Plum (*Yenidünya*)	16		
Jujube (*Hünnap*)	15		
Laurel (*Defne*)	17		
Laurel Cherry (*Karayemiş*)	1	6	
Lemon (*Limon*)	5		
Linden (*Ihlamur*)	4	3	1
Locust (*Akasya*)	25	79	
Mandarin (*Mandalina*)	1		
Mastic Tree (*Kavlan*)	2		
Medlar (*Muşmula*)	6		1
Mulberry (*Dut*)	28	11	3
Oak (*Meşe*)	14		55

Type of Tree	Quantity (Number)		
	Section 1	Section 2 (KM 58-60)	Section 3
Olive (*Zeytin*)	92	19	
Peach (*Şeftali*)	50	3	
Pear (*Armut*)	90	10	14
Persimmon (*Trabzon Hurması*)	19		
Pine (*Çam*)	454	61	89
Plane Tree (*Çınar*)			1
Plum (*Erik*)	139	19	7
Pomegranate (*Nar*)	58	3	
Poplar (*Kavak*)	28	2	7
Quince (*Ayva*)	77	1	1
Rock Cherry (*Mahlep*)	35		
Silverberry (*İğde*)	9	2	
Sour Cherry (*Kiraz*)	85		
Spruce (*Çam Ladin*)	605		
Walnut (*Ceviz*)	786	59	343
Wild Pear (*Y. Armut*)			29
Willow (*Söğüt*)	15	1	
	3,545	**884**	**4,589**

3.1.6. Loss of Non-residential (Secondary) Structures

The affected non-residential (secondary) structures on affected **private and public** parcels identified to date as part of asset inventory include the following.

- Canopy[49]
- Barns
- Container
- Depot (Warehouse)
- Fence
- Gate
- Henhouse
- Pool
- Shed
- Wall
- Water pump
- Well

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

The number of parcels containing affected **non-residential structures**, as well as the number of structures on these parcels, is summarised in Table 3-14. As can be seen, the majority of the affected non-residential structures are located on private land. Structures located on public land account for only a small proportion of the total and are summarised separately in Section 3.1.7.

For **Section 1, Section 2 (KM 58 – 60)**, and **Section 3**, this information has been obtained from Structure Valuation Forms.

For the **remainder of Section 2**, the structures have been identified by the RAP Consultant through a review of the expropriation plans GIS-based analysis of the route.

Owners and users (formal and informal) of each structure are identified as part of the RAP field surveys through interviews to be conducted with settlement heads and/or affected people (see Chapter 4).

Table 3-14. Number of Private and Public Parcels Containing Affected Non-residential (Secondary) Structures

Section	Province	District	Neighbourhood	Number of Parcels Containing Affected Non-residential Structures			Number of Affected Non-residential Structures
				Private	Public (see Table 3-15)	Total	
KM 0-35	İstanbul	Silivri	Alipaşa	2	0	2	2
			Çeltik	11	0	11	19
			Yolçatı	1	0	1	1
			Sancaktepe	18	1	19	30
			Balaban	30	1	31	46
			Gümüşyaka	2	0	2	8
			Değirmenköy	2	0	2	5
	Tekirdağ	Çorlu	Seymen	4	0	4	11
			Şahpaz	1	0	1	1
		Marmaraereğlisi	Çeşmeli	1	0	1	1
			Sultanköy	1	0	1	1
			Cedit Ali Paşa	1	0	1	1
			Yakuplu	4	0	4	11
			Türkmenli	1	0	1	1
Sub-total KM 0-35			**14**	**79**	**2**	**81**	**138**
KM 35-70	Tekirdağ	Süleymanpaşa	Yenice	1	0	1	1
			Köseilyas	1	0	1	1
			Gündoğdu	1	0	1	1
			Kayı	3	1	4	6
			Zafer	3	0	3	4
Sub-total KM 35-70			**5**	**9**	**1**	**10**	**5**
KM 70-105	Tekirdağ	Süleymanpaşa	Seymenli	1	0	1	1
			Güveçli	2	0	2	4
			İnecik	4	0	4	14
			Nusratfakı	2	0	2	2
			Akçahalil	1	0	1	1
		Malkara	Yenice	1	0	1	2
Sub-total KM 70-105			**6**	**11**	**0**	**11**	**24**
Total			**25**	**99**	**3**	**102**	**175**

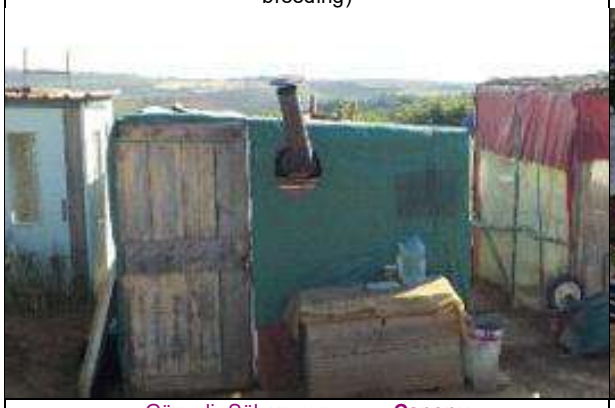
Note: The figures for Section 1, Section 2 (KM 58–60, Kayı and Zafer neighbourhoods) and Section 3 are final and have been obtained from Structure Valuation Forms. For the remainder of Section 2 (KM 35–70, excluding KM 58–60), the structures have been identified by the RAP Consultant through a GIS-based analysis of the route.

Çeltik, Silivri – **Depot (Warehouse)**
(KM 4+106 Private Parcel No.183/15 – vineyard
– According to structure valuation form)

Balaban, Silivri – **Cassion Well**
(KM 8+867 Private Parcel No.734/134 – agricultural land
– According to structure valuation form)

Sancaktepe, Silivri – **Wooden Barn (Canopy)**
(KM 7+878 Private Parcel No.131/7– agricultural land
– According to structure valuation form, used for livestock breeding)

Zafer, Süleymanpaşa – **Depot**
(KM 60+606 Private Parcel No.345/14 – agricultural land
– According to field survey, the structure was formerly used as a henhouse and is currently used as a depot)



Güveçli, Süleymanpaşa – **Canopy**
(KM 77+411 Private Parcel No.112/4 – agricultural land
– According to structure valuation form)

İnecik, Süleymanpaşa – **Well**
(KM 85+102 Private Parcel No.205/102 – agricultural land
– According to structure valuation form)

İnecik, Süleymanpaşa – **Container**
(KM 85+069, Private Parcel No. 205/110 – agricultural land
– According to structure valuation form)

İnecik, Süleymanpaşa – **Depot**
(KM 85+069, Private Parcel No. 205/110 – agricultural land
– According to structure valuation form)

Figure 3-6. Examples of Affected Non-residential Structures

The owners of these non-affected non-residential (secondary) structures on parcels used formally are compensated by KGM in accordance with the Expropriation Law, following deductions for depreciation.

There are no schools or health infrastructure to be relocated within Project's expropriation corridor according to the expropriation plans.

According to the desk-based review of the expropriation plans and a visual analysis of the route using GIS tools and field observations, **no greenhouses have been identified.** The affected residential structure (houses) and business structures are separately presented in Section 3.3 and Section 3.4.

3.1.7. Summary of Non-residential Structures and Trees on Public Lands

Table 3-15 provides a summary of non-residential structures and trees on public and legal entity lands, as identified in previous sections. The owners of these are not compensated by KGM in accordance with the Expropriation Law if the land is not used formally.

As shown in the table, **there are no residential structures located on public or legal entity lands**. There is only one business located in Gümüşyaka (TH1), which will not require relocation and will experience only a partial loss of land.

Table 3-15. Summary of Non-residential Structures and Trees on Public and Legal Entity Lands

Section	No	Structure Type	District	Neighbourhood	Parcel No	Ownership Status	Types of Structure
Section 1 KM 0-35	1	Tree (Section 3.1.5)	Silivri	Balaban	732/127	Legal Entity	Apricot, Walnut
	2	Business (**not** to be relocated) (Section 3.4)	Silivri	Gümüşyaka	TH1	Non-registered	Iron Door, Concrete Floor, Canopy, Fence, Pavement
	3	Non-residential	Silivri	Sancaktepe	232/10	Treasury	Wire Mesh
	4	Non-residential (Section 3.1.6)	Silivri	Balaban	TH1	Non-registered	Concrete Floor
Section 2 KM 35-70	5	Non-residential (Section 3.1.6)	Süleymanpaşa	Kayı	Yol7	Road	Canopy
Section 3 KM 70-105	6	Tree (Section 3.1.5)	Süleymanpaşa	Seymenli	108/5	Treasury	Linden, Black Poplar
	7	Tree (Section 3.1.5)	Süleymanpaşa	Karahisarlı	103/1	Common Property – Agricultural land	Pear, Plum, Black Poplar
	8	Tree (Section 3.1.5)	Süleymanpaşa	Karahisarlı	163/1	Treasury-Forestry	Pear, Walnut

3.2. Project-Affected Persons (PAPs)

The expropriation plans include the initial information on the owners and shareholders of the affected land parcels (landowners). Before issuing negotiation invitations under Article 8, the exact number of landowners and shareholders, including rightful heirs of deceased persons, is determined by KGM – KÖSOB.

The landowners may themselves use the affected land (**owner land user**), or the lands may be used by other formal or informal users **(non-owner land users)**. Formal land users mainly comprise tenant farmers on private land who hold written lease agreements signed with the landowners, while informal land users mainly comprise users of public land. As this information is not included in KGM's expropriation data, the identification of formal and informal users of the affected land was carried out as part of the RPF and RAP studies, as summarised below under Section 3.2.2.

3.2.1. Private Landowners

The number of landowners per affected settlements is presented in Table 3-16, based on the data obtained from KÖSOB in April 2026

Table 3-16. Number of Landowners per Affected Neighbourhoods

Section	Province	District	Neighbourhood	Number of Parcels		Number of Landowners
				Private	Legal Entities	
Section 1 (KM 0-35)	İstanbul	Silivri	Alipaşa	46	2	217
			Çeltik	144		317
			Semizkumlar	3		11
			Yolçatı	31		77
			Sancaktepe	94		326
			Balaban	178*	1	630
			Değirmenköy	137		819
			Gümüşyaka	65		145
	Tekirdağ	Marmaraereğlisi	Sultanköy	10		40
			Cedit Ali Paşa	15		83
			Yakuplu	108	3	643
			Türkmenli	8		23
			Çeşmeli(*)	44		7,200
		Çorlu	Seymen	112	2	697
			Şahpaz	69		130
			Türkgücü	4		13
Sub-total KM 0-35			**16**	**1,068**	**8**	**11,371**
Section 2 (KM 35-70)	Tekirdağ	Marmaraereğlisi	Çeşmeli(*)	7		TBD
		Çorlu	Yenice	36		TBD
			Maksutlu	1		TBD
		Süleyman paşa	Karaevli	36		TBD
			Husunlu	35		TBD
			Gazioğlu	229	7	TBD
			Köseilyas	61	1	TBD
			Kayı	85	2	TBD
			Eskicami	3		TBD
			Gündoğdu	97	4	TBD
			Aydoğdu	12(***)	2	TBD
			Zafer	60	4	TBD
			Yağcı	88(****)		TBD
Sub-total KM 35-70			**12**	**750**	**20**	**~10,000**
KM 70-105	Tekirdağ	Süleyman paşa	Seymenli	43	4	171
			Güveçli	37	2	108
			Nusratlı	27		136
			Karahisarlı	17		85
			Nusratfakı	47		115
			İnecik	96	2	263
			Akçahalil	54	1	112
			Kınıklar	6		11
		Malkara	Yenice	38	1	132
			Hereke	30		55
			Ahievran	43		74
Sub-total KM 70-105			**11**	**438**	**10**	**1,262**
Total			**39**	**2,256**	**38**	**~22,633**

Source: KÖSOB, April 2026.
Note: The figures for Section 2 ***(excluding KM 58 – 60, for which approved expropriation data is available)*** *are based on current version of the expropriation plans and may change following the completion of cadastral approval and valuation.*
(*) One of these parcels is jointly owned by private owner(s) and the state.
(**) This settlement falls within both KM 0 – 35 and KM 35 – 70 sections; however, it has been counted only once to avoid double counting.
(***) Out of the 12 privately owned parcels, 2 are under litigation and are categorised under "Private".
(****) Out of the 88 privately owned parcels, 1 is under litigation and is categorised under "Private".

As KGM – KÖSOB identifies each landowner and shareholder, including rightful heirs, before issuing negotiation invitations under Article 8, the data is largely accurate for **Section 1 and Section 3** since Article 8 invitation process has been completed in these sections. For **Section 2,** the data is based on the expropriation plans, which will be verified and refined by KGM – KÖSOB before the Article 8 invitations are sent to the landowners and shareholders. The figures, especially for Section 2, are anticipated to change, potentially increasing, in the coming periods following the completion of inheritance and succession procedures by the landowners during the process starting from Article 8 negotiations.

It is worthwhile to note that number of landowners should not be interpreted as a reliable indicator of the **total number of project-affected individuals**. As confirmed by owner lists from the KGM, **this number also includes** individuals **who are not residing in the Project area**, and in some cases, are residing in **other cities or abroad**. Many of these shareholders **do not maintain any economic connection with the land** and will not be physically or economically affected by the Project. Nevertheless, they will receive cash compensation from KGM in accordance with the Expropriation Law, in proportion to the shares they own in the land.

Information on Project-Affected Persons (PAPs), **as the actual land users** – whether owners or non-owners (users) of the affected lands.

Single Owner and Multi Shareholder Ownership Structure

Single owner and multi shareholder ownership structure of the affected parcels have been analysed as part of the RAP based on the expropriation plans obtained from KGM – KÖSOB and presented in Table 3-17.

Table 3-17. Number of Parcels with Single Owner and Multi-shareholders

Section	Number of Parcels with						
	Single Owner	Multi Shareholders					Total
	1	2	3	4	5	5<	
Section 1	690	62	68	41	36	171	1,068
Section 2	393	80	54	46	27	150	750
Section 3	276	28	32	19	17	66	438
Total	**1,359**	**170**	**154**	**106**	**80**	**387**	**2,256**

Heir Identification by KGM - KÖSOB

As a standard practice, KGM – KÖSOB identifies deceased persons and their legal heirs through the Central Civil Registration System (MERNIS) and Population and Citizenship Affairs System and sends Article 8 notifications to invite them to participate in negotiations.

As outlined in KGM's booklet on expropriation procedures, the following tasks are required be completed by the rightful heirs **to resolve inheritance and succession issues prior to the Article 8 negotiation meetings** and to become eligible to reach an agreement with KGM and sign purchase agreement protocols:

- If the immovable property subject to expropriation is registered in the name of a **deceased owner**, a certificate of inheritance must be obtained from the relevant Court or Notary according to the date of death, submitted to the Land Registry Directorate, the transfer of inheritance must be completed, and participation in the meeting must be ensured with the new title deed after the inheritance link is severed.
- For immovable properties with **liens, mortgages, or similar encumbrances**, if the period has expired or if their removal is possible, such encumbrances must be lifted so that participation in the meeting can be ensured.
- For owners who are under **legal incapacity**, participation must be ensured with a guardianship or trusteeship document obtained from the relevant authorities.
- If one or more of the owners grant power of attorney, the original power of attorney document must be brought.
- If immovable properties have been de facto divided among **co-owners** and left to the use and benefit of one or more of them, participation in the meeting must be ensured with the agreement of all shareholders regarding the actual situation so that all shareholders join the meeting collectively.
- If the Administration has previously obtained a **consent letter** (*muvafakatname*) from the property owner and entered the immovable property, the submission of the document given to the citizen regarding the period of use will accelerate the expropriation procedures.

The Article 8 notifications sent by KGM – KÖSOB to landowners, including the rightful heirs, **explicitly informs them in advance** that if the parcel owner is deceased, the heirs who will attend the negotiation meetings must first obtain clearance regarding inheritance and transfer tax from the relevant Tax Office, complete the title transfer procedures at the relevant Land Registry Directorate, and attend the negotiation meetings with the updated title deed record.

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

If Article 27 is applied in the Project, as part of RAP implementation, the SPV will individually contact the settlement heads and the identified heirs – where their contact details are available – in each settlement to inform them about the support available through the RAP Fund. This includes the allowance provided under the Small Costs Fund to facilitate the completion of inheritance and succession procedures by the rightful heirs.

If the heirs' phone numbers cannot be accessed by the SPV due to legal restrictions on personal data protection, individual communication may not be possible. In such cases, the SPV will rely on the heirs to initiate contact using the details provided in official Article 8 letters (sent with return receipt requested) delivered to all heirs, or through the contact details of the SPV to be communicated via GLAC or other appropriate means.

3.2.2. Land Users (Informal and Formal)

The expropriation plans include information on the owners and shareholders of the affected land parcels (landowners). The landowners may themselves use the affected land (**owner land user**), or it may be used by other formal or informal users **(non-owner land users)**. Formal land users mainly comprise tenant farmers on private land, while informal land users mainly comprise users of public land.

As this information is **not** included in KGM's expropriation data, the identification of formal and informal users of the affected land was carried out as part of the RAP studies. For this purpose, in November 2025, **the SPV engaged a third-party implementation partner to identify the formal and informal users of the parcels located within the Motorway's expropriation corridor**, through field surveys and interviews conducted with settlement heads.

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

The land user identification surveys for Section 1 and Section 3 were completed in November 2025. Surveys will be conducted for **Section 2** upon approval of the expropriation plans by the cadastral office and preparation of the structure valuation forms with the approval of KGM – KÖSOB.

The total number of land users identified to date on private and public parcels is summarised in Table 3-18 and provided in further detailed breakdown in Table 3-19.

Table 3-18. Number of Land Users

Section	Total Number of Parcels	Parcels Reported as Used for Agricultural Purposes (according to user identification surveys)	Land Users
Section 1: KM 0-35	1,206	807	326
Section 2: KM 35 – 70	878	TBD	~310[50]
Section 3: KM 70 – 105	562	451	280
Total	**2,646**	TBD	**~916**

[50] This is the estimated number of land users based on the data collected for Section 1 and Section 3. Surveys will be conducted for Section 2 upon completion of valuation for the full Section 2 and preparation of the structure valuation forms with the approval of KGM – KÖSOB.

For private parcels (1,219 – see Table 3-19 Item Ref. II-d) for which land users were identified in Section 1 and Section 3, the results of the user identification indicate the following:

- A clear majority (95%, 1,163 parcels) of the parcels are cultivated by a **single user**, while the remaining 5% (56 parcels) have **multiple users**.
- The majority of parcels (78%, 951 parcels) are used by **non-owner land users**. The total number of unique non owner land users is 471. The remaining 22% (268 parcels) are used by 195 unique **owner land users** (landowners).
- Land users are predominantly male (98%).
- All land users identified as using **public lands** are male.

Table 3-19. Number of Land Users based on Land User Identification Survey

Item Ref.	Indicator	Overall Total	Section 1 (KM 0–35)	Section 3 (KM 70–105)
I.	**General – Parcel Coverage**			
a)	**Parcels reported as used** (b + c)	**1,258**	**807**	**451**
b)	Parcels for which user identification was completed (d + l)	1,252	805	447
c)	Parcels for which user identification was not completed	6	–	–
II.	**Private Land Parcels**			
d)	**Private parcels with user identification completed** (e + f)	**1,219**	**792**	**428**
e)	Parcels with a **single** user	1,163	760	403
f)	Parcels with **multiple** users (g + h + l + j + k)	56	31	25
g)	— 2 users	47	–	–
h)	— 3 users	7	–	–
i)	— 4 users	1	–	–
j)	— 6 users (maximum observed)	1	–	–
k)	**Total unique land users (private parcels)**	**594**	**n/a**	**n/a**
III.	**Public Land Parcels**			
l)	**Public parcels with user identification completed** (m + n)	**33**	**13**	**20**
m)	Used for livestock grazing	15*	2	13
n)	Used by private individuals (non-livestock)	18	12	6
o)	**Total unique users on public land (individuals only)**	**12**	**6**	**6**
IV.	**Total Land Users by Land Type (Summary)**			
IV.1	**Private lands**			
p)	**Total unique private land users** (k = r + s)	**594**	**n/a**	**n/a**
q)	— Female users	12	–	–
r)	— Male users	582	–	–
s)	**Parcels** where owner = user (same person) **(owner-land user)** (d – t)	268	–	–
t)	**Parcels** where owner ≠ user (tenant/other) **(non owner-land user)** (d – s)	951	–	–
u)	Unique owner-users (k – v + w)	195	–	–
v)	Unique non-owner users (k – u + w)	471	–	–
w)	Users appearing in both categories (u and v) **(overlap[51])**	72	–	–
IV.2	**Public lands**			
x)	**Total unique public land users – individuals**	**12**	**6**	**6**
y)	— Female users	0	–	–
z)	— Male users	12	–	–
IV.3	**Total unique land users (private and public)** (k + o) and (p + x)	**606**	**326**	**280**

[51] Total unique users = 195 + 471 − 72 = 594 (overlap of 72 persons who are owner-users on some parcels and non-owner users on others).

3.2.3. PAP Database

In **November 2025** and **February – March 2026**, a comprehensive RAP field programme has been completed as part of the RAP baseline surveys. During the surveys, the survey team has interviewed the affected households within the survey sample[52] (see Section 5.1 for the Methodology of Baseline Surveys) and collected information on their baseline socio-economic conditions key to RAP.

Based on the RAP baseline surveys, the SPV has started development of a **Project-Affected Persons (PAP) Database for Land Acquisition** in parallel with the RAP process to complete the database for all PAPs.

This database incorporates information on owners and shareholders identified by the KGM - KÖSOB through the census and asset inventory process (carried out by the national engineering firm/valuation contractor), as well as formal and informal users of affected lands, structures, and trees, identified by the RAP team and the Project CLOs during the RAP field surveys.

The database also includes contact information and details of any identified vulnerabilities among affected people for use by the RAP Implementation Team during the RAP implementation period.

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

3.3. Affected Residential Structures (Houses)

The houses within the Motorway's expropriation corridor have been identified through a combination of expropriation plans, structure valuation forms, and GIS-based analysis conducted by the RAP Consultant. Data extracted from these sources have been reviewed and supplemented through the RAP surveys conducted (with the objective of a full census of affected buildings). The data sources vary by section:

- **Section 1:** The figures are final and drawn from Structure Valuation Forms.
- **Section 2 (KM 58–60):** The figures are final and drawn from Structure Valuation Forms.
- **Remainder of Section 2 (KM 35–70, excluding KM 58–60):** Identification relies solely on GIS-based analysis by the RAP Consultant.
- **Section 3:** The figures are final and drawn from Structure Valuation Forms.

As the expropriation plans and structure valuation forms do not specify the type of house, its occupancy status, or the users of the affected houses (e.g. owners, formal tenants, or informal occupants), the following data on the affected houses were collected through the **RAP field surveys**.

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

Table 3-20 provides a summary breakdown of the settlements and parcels containing affected houses, the number of affected residential structures, the number of affected households, and the type of use of the affected houses. There are **no houses on public lands** including forestry, treasury or unregistered.

It should be noted that houses used seasonally or occasionally are not the primary residences of the affected households, and that these households have permanent residences elsewhere or use these houses as secondary homes. All affected houses are located on private parcels.

[52] The survey design targeted full census for affected residential and non-residential structures, including businesses, and random sampling for affected private and public lands and household-level livelihood interviews with their formal and informal users (sample size has been calculated for 95% confidence level and 5% margin of error).

Table 3-20. Summary Breakdown of Affected Residential Structures (Houses)

Section	District	Neighbourhood	Number of Parcels Containing Houses	Number of Residential Buildings	Type of Use and Occupancy Status (Number of Households)			Number of Households that will Relocate
			Private		Permanent	Temporary	Vacant (will not be subject to relocation)	(excl. vacant as vacant houses are not subject to relocation)
Section 1 (KM 0 – 35)	Silivri	Çeltik	8	8	0	8	0	**8**
	Silivri	Sancaktepe	7	8	0	6	1	**6**
	Silivri	Balaban	7	9	0	8	1	**8**
	Silivri	Değirmenköy	1	1	0	1	0	**1**
	Çorlu	Seymen	1	1	0	1	0	**1**
	Çorlu	Şahbaz	1	1	0	0	1	**0**
Sub-total Section 1			**25**	**28**	0	**24**	**3**	**24**
Section 2 (KM 35 – 70)	Süleymanpaşa	Gazioğlu	4	4	4(*)	0	0	**4**(*)
	Süleymanpaşa	Köseilyas	4	4	4(*)	0	0	**4**(*)
	Süleymanpaşa	Gündoğdu	5	5	5(*)	0	0	**5**(*)
	Süleymanpaşa	Zafer	4	7	5	1	2	**6**
Sub-total Section 2			**17**	**20**	**19**	**0**	**2**	**19**
Section 3 (KM70 – 105)	Tekirdağ	--	0	0	0	0	0	**0**
Sub-total Section 3			0	0	0	0	**0**	**0**
Total		**10**	**42**	**48**	**19**	**24**	**5**	**43**
Number of owners								**42**
Number of formal house users (renters)								**1**
Number of informal house users								**0**

(*) Owners of affected houses on parcels where surveys could not be conducted in Section 1 and Section 2, have been assumed as owners, who use the houses as their primary residences (permanent). Additionally, households on parcel 347/2 in Zafer neighbourhood (excluding the parcel owner) were considered as owners as they are declared to be first-degree relatives of the parcel owner and reside in the houses without rental payment.

Photographs showing the current status of selected affected houses are presented in Figure 3-7. It should be noted that some parcels within the Project area contain **multiple** affected houses. For example, a single large parcel (e.g. Zafer neighbourhood, 347/2 containing four residential buildings) may accommodate several buildings and other structures. As a result, the number of **parcels** with affected structures **differs from the actual number of affected households.**

Çeltik, Silivri (180/20) – KM 4+957 **Seasonal** Use	Sancaktepe, Silivri (180/20) – KM 6+837 **Seasonal** Use
Zafer, Süleymanpaşa (347/2) – KM 59+800; 2+096 **Permanent** Use	Zafer, Süleymanpaşa (347/2) – KM 59+800; 2+096 **Permanent** Use
Balaban, Silivri (732/120) – KM 8+077 **Seasonal** use (weekend)	Zafer, Süleymanpaşa (345/50) – KM 60+700 **Vacant –** (Owner of the land and the house has passed away; the heirs reportedly live abroad and do not use the house)

Figure 3-7. Photographs of Selected Affected Houses

The list of affected houses is shown in Table 3-21.

The SPV will maintain ongoing consultations with owners and users of affected houses as part of this RAP and the SEP. Additionally, the Project's Grievance Mechanism will remain accessible to all stakeholders, including affected people, throughout both the construction and operation phases of the Project.

Table 3-21. List of Affected Residential Structures (Houses)

No	KM Chainage	Province, District	Neighbour hood	Parcel No.	Parcel Area (m²)/ Exp. Area (m²)	Type of Title Deed	Ownership Status	Actual User[53]	Type of Structure[54] /Type of Use
Section 1: KM 0 – 35									
1	3+800	İstanbul, Silivri	Çeltik	173/6	348.88/ 348.88	Agricultural Land	Private (*"Ö.Ç"*)	--	House 1 - One Storey, Portable Container - Seasonal
2	3+826	İstanbul, Silivri	Çeltik	173/9	483.91/ 483.91	Agricultural Land	Private (*"N.M"*)	--	House 1 - One Storey, Concrete Vineyard - Seasonal
3	3+951	İstanbul, Silivri	Çeltik	183/37	7,065.60/ 6,280.99	Agricultural Land	Private (*"S.Ö."*)	Owner *("S.Ö")*	House 1 - One Storey, Portable Container - Seasonal
4	4+095	İstanbul, Silivri	Çeltik	183/40	4978.95/ 665.94	Agricultural Land	Private *("Ş.G. and shareholders)*	Owner *("Ö.E")*	House 1 - One Storey, Container - Seasonal
5	4+095	İstanbul, Silivri	Çeltik	183/14	3,749.58/ 3,749.58	Agricultural Land	Private (*"A.İ.A.Y."*)	Owner (*"A.İ.A.Y."*)	House 1 - One Storey, Vineyard - Seasonal
6	4+163	İstanbul, Silivri	Çeltik	183/12	928.06/ 928.06	Vineyard	Private *("E.B.")*	Owner *("E.B.")*	House 1 - Two Storeys - Seasonal
7	4+948	İstanbul, Silivri	Çeltik	180/22	6,298.76/ 4,818.07	Agricultural Land	Private ("S.Ç.")	Formal User *("O.T.")*	House 1 - One Storey, Vineyard - Seasonal
8	4+957	İstanbul, Silivri	Çeltik	180/20	3,343.08/ 3,343.08	Agricultural Land	Private (*"E.K."*)	Owner (*"E.K."*)	House 1 - One Storey, Vineyard - Seasonal
9	6+611	İstanbul, Silivri	Sancaktepe	243/16	2,719.23/ 1,961.55	Agricultural Land	Private (*"Y.T. and shareholders"*)	--	House 1 - One Storey, Container - Seasonal
10	6+813	İstanbul, Silivri	Sancaktepe	233/91	1,784.47/ 181.98	Agricultural Land	Private *("M.Ç.")*	Owner (*"M.Ç."*)	House 1 - One Storey, Prefabricated - Seasonal House 2 - One Storey, Vineyard - Seasonal
11	6+837	İstanbul, Silivri	Sancaktepe	233/87	848.46/ 848.46	Agricultural Land	Private (*"S.R."*)	--	House 1 - One Storey, Container Vineyard - Seasonal
12	6+843	İstanbul, Silivri	Sancaktepe	233/90	1,506.36/1,130.13	Agricultural Land	Private (*"M.S.S."*)	Owner (*"M.S.S."*)	House 1 - One Storey, Container with an adjoining reinforced concrete - Seasonal
13	7+203	İstanbul, Silivri	Sancaktepe	232/35	1,110.16/ 321.64	Agricultural Land	Private *("P.S.")*	Owner *("P.S.")*	House 1 - One Storey, Vineyard - Seasonal
14	7+680	İstanbul, Silivri	Sancaktepe	131/1	20,367.91/ 11,511.55	Agricultural Land	Private *("A.Ö. and shareholders)*	--	House 1 - One storey, Vineyard - Seasonal
15	7+689	İstanbul, Silivri	Sancaktepe	131/23	770.38/ 326.66	Agricultural Land	Private *("A.K")*	--	House 1 - Ruin, Vineyard - Vacant
16	7+971	İstanbul, Silivri	Balaban	732/153	673.58/ 375.19	Agricultural Land	Private *("Y. B")*	--	House 1 - One storey, Container - Seasonal
17	7+975	İstanbul, Silivri	Balaban	731/17	5,589.48/ 1,943.39	Agricultural Land	Private (*"S.K. and M.A."*)	--	House 1 - One storey, Vineyard - Seasonal
18	8+077	İstanbul, Silivri	Balaban	732/120	3,235.78/ 3,235.78	Agricultural Land	Private (*"H.B. and shareholders")*	--	House 1 - One Storey, Prefabric Vineyard - Seasonal House 2 - One Storey, Prefabric Vineyard - Seasonal House 3 - One Storey, Container - Seasonal
19	8+300	İstanbul, Silivri	Balaban	732/92	1,288.99/ 1,288.99	Agricultural Land	Private *("G.K and M.")*	--	House 1 - One Storey, Container - Vacant
20	8+430	İstanbul, Silivri	Balaban	732/23	1,070.83/ 1,070.83	Agricultural Land	Private *("E.T.")*	--	House 1 - One storey, Container - Seasonal
21	8+525	İstanbul, Silivri	Balaban	732/80	1,444.25/ 1,444.25	Agricultural Land	Private (*"A.Ö."*)	--	House 1 - One storey, Container - Seasonal

[53] This information is provided in accordance with the findings of the RAP field surveys.

[54] The type of structure and type of use are defined based on RAP field surveys.

No	KM Chainage	Province, District	Neighbour hood	Parcel No.	Parcel Area (m²)/ Exp. Area (m²)	Type of Title Deed	Ownership Status	Actual User[53]	Type of Structure[54] /Type of Use
22	8+815	İstanbul, Silivri	Balaban	734/154	5,853.48/ 4,637.08	Agricultural Land	Private (*"R.Ç."*)	Owner (*"R.Ç."*)	House 1 - One storey, Container Vineyard - Seasonal
23	17+400	İstanbul, Silivri	Değirmenköy	368/144	62,694.23/ 28,609.50	Agricultural Land	Private (*"P.S. and shareholders)*	--	House 1 - One storey, Prefabricated - Seasonal
24	19+672	Tekirdağ, Çorlu	Seymen	115/69	55,244.34/ 14,729.93	Agricultural Land	Private (*"A.K. and shareholders")*	--	House 1 - One storey, Container Vineyard - Seasonal
25	24+972	Tekirdağ, Çorlu	Şahbaz	0/837	13,200.00/ 3,356.42	Agricultural Land	Private *("E.K.")*	Owner *("E.K.")*	House 1 - One Storey, Rough Work - Vacant
Section 2: KM 35 – 70 (Surveys TBD following cadastral approval of expropriation plans)									
26	47+500	Tekirdağ, Süleymanpaşa	Gazioğlu	0/30	5,300.00/ 4,689.98	Agricultural Land	Private (*"S.S."*)	TBD	House 1 TBD
27	47+534	Tekirdağ, Süleymanpaşa	Gazioğlu	0/336	4,850.00/ 4,850.00	Agricultural Land	Private (*"S.D and shareholders")*	TBD	House 1 TBD
28	51+360; 0+800	Tekirdağ, Süleymanpaşa	Gazioğlu	0/334	3,750.00/ 3,750.00	Agricultural Land	Private (*"A.K and shareholders")*	TBD	House 1 TBD
29	51+360; 0+850	Tekirdağ, Süleymanpaşa	Gazioğlu	0/332	2,750.00/ 2,750.00	Agricultural Land	Private (*"S.G and shareholders")*	TBD	House 1 TBD
30	55+800	Tekirdağ, Süleymanpaşa	Köseilyas	N/A(*)	N/A	N/A	N/A	TBD	House 1 TBD
31	55+800	Tekirdağ, Süleymanpaşa	Köseilyas	N/A(**)	N/A	N/A	N/A	TBD	House 1 TBD
32	55+900	Tekirdağ, Süleymanpaşa	Köseilyas	0/1083	20,000.00/ 4,551.26	Agricultural Land	Private (*"H.A and shareholders"*)	TBD	House 1 TBD
33	55+900	Tekirdağ, Süleymanpaşa	Köseilyas	0/1084	14,800.00/ 1,529.22	Agricultural Land	Private (*"Y.Ö and shareholders"*)	TBD	House 1 TBD
34	56+000	Tekirdağ, Süleymanpaşa	Gündoğdu	211/2	14,993.94/ 14,993.94	Agricultural Land	Private (*"A.Ö."*)	TBD	House 1 TBD
35	56+579	Tekirdağ, Süleymanpaşa	Gündoğdu	200/35	8,546.90/ 562.17	Agricultural Land	Private (*"S.K."*)	TBD	House 1 TBD
36	57+000	Tekirdağ, Süleymanpaşa	Gündoğdu	200/55	8,024.29/ 8,024.29	Agricultural Land	Private (*"A.A."*)	TBD	House 1 TBD
37	57+000	Tekirdağ, Süleymanpaşa	Gündoğdu	200/52	16,263.49/ 16,263.46	Agricultural Land	Private (*"A.F."*)	TBD	House 1 TBD
38	57+200	Tekirdağ, Süleymanpaşa	Gündoğdu	197/5	5,684.66/ 5,684.66	Agricultural Land	Private (*"H.H.O."*)	TBD	House 1 TBD
39	59+800; 1+481	Tekirdağ, Süleymanpaşa	Zafer	347/13	2,310.00/ 843.58	Vineyard	Private (*"B.Ö. and shareholders"*)	--	House 1 - One Storey, Vineyard - Vacant
40	59+800; 2+096	Tekirdağ, Süleymanpaşa	Zafer	347/2	11,547.00/ 6,931.52	Agricultural Land	Privae (*"F.T."*)	Owner *("F.T")*	House - Two Storeys, Concrete - Permanent House 2 - Two Storeys, Concrete - Permanent House 3 - Two Storeys, Concrete - Permanent House 4 - One Storey, Container - Permanent
41	60+700	Tekirdağ, Süleymanpaşa	Zafer	345/50	23,832.00 /10,215.13	Agricultural Land	Private (*"H.A."*)	Owner (*"H.A."*)	House 1 - One Storey, Concrete - Vacant
42	61+500	Tekirdağ, Süleymanpaşa	Zafer	344/23	24,891.00/6 75.18	Vineyard and Agricultural Land	Private (*"F.T."*)	Owner (*"F.T."*)	House 1 - One Storey, Concrete - Permanent
Section 3 (KM 70 – 105)									**No house**

(*) N/A (Parcel 1080 is the adjacent parcel; the parcel containing the affected structures could not be identified in TKGM records due to its unregistered status)

(**) N/A (Parcel 1081 is the adjacent parcel; the parcel containing the affected structures could not be identified in TKGM records due to its unregistered status)

All affected houses are located on private parcels. In line with practices common to many jurisdictions, 13 parcels affected by the Project are under joint ownership. When two or more individuals share ownership of a parcel that includes a structure, compensation from KGM is allocated among them in proportion to their registered shares. If the co-owners mutually agree and authorise (through consent letters signed by all shareholders) payment to the household's resident owner, KGM may transfer the compensation directly to that person in case of Article 8 agreement. Obtaining such agreement, however, can prove difficult and may become prolonged or even inconclusive when there are numerous co-owners, conflicting interests, or absentee owners. A further concern with joint ownership is that the compensation corresponding to each individual's share may be too limited to secure an alternative property, which can expose households to the risk of homelessness.

In cases of joint landownership, the SPV will monitor whether the home owner, who is the actual resident, has obtained formal consent from the other non-resident co-owners of the land confirming their ownership rights. If such consent is not in place, the SPV will plan and implement corrective actions, including helping the actual resident engage – and, if possible, reach an agreement with other shareholders – with support from KGM - KÖSOB officials, to ensure that the home owner (actual resident) receives compensation for the house at full replacement cost or provided with a replacement house. In cases where user PAPs do not receive sufficient compensation to purchase or relocate to housing of similar value, the SPV will utilise the RAP Fund to ensure that the full replacement cost is secured for the home owner. In instances where ownership and use are vested in separate entities, the SPV will also ensure that the actual user of the house is provided with the necessary compensation and assistance to relocate to a comparable housing option.

3.4. Affected Businesses

The businesses within the Motorway's expropriation corridor have been identified through a combination of expropriation plans, structure valuation forms, and GIS-based analysis conducted by the RAP Consultant.

Data extracted from these sources have been reviewed and supplemented through the RAP surveys conducted (with the objective of a full census of affected buildings). The data sources vary by section:

- **Section 1:** The figures are final and drawn from Structure Valuation Forms.
- **Section 2 (KM 58–60):** The figures are final and drawn from Structure Valuation Forms.
- **Remainder of Section 2 (KM 35–70, excluding KM 58–60):** Identification relies solely on GIS-based analysis by the RAP Consultant.
- **Section 3:** The figures are final and drawn from Structure Valuation Forms.

The types of impacts on businesses include the following main categories:

(A) Businesses that will be relocated due to the loss of their main operational business structure – relocation may take place within the boundaries of the affected parcel, if sufficient remaining land is available, or to an off-site location.

(B) Businesses that will not be relocated but may experience partial loss of land and/or assets – their land and/or structures (such as canopies, walls, fences, gates, etc. – as identified in the expropriation plans and valuation reports) are partially affected, but they will continue operating at their current locations.

(C) Non-operational businesses – These are currently inactive thus no economic displacement impacts are anticipated. These cases will be monitored during RAP implementation.

Table 3-22 presents the number of businesses falling within these categories. As shown, only **one business** will require relocation (**Category A**) due to impacts on its operational structures. **Six** businesses (**Category B**) will experience partial loss of land and/or assets; however, these impacts will not affect their operations, and the businesses are anticipated to be able to continue operating at their current premises as the affected land and/or assets will be compensated by KGM in accordance with the Expropriation Law, and any additional assistance required under the RAP to enable the businesses to continue their operations is also provided by the SPV, where applicable.

One business (Category C) included in the expropriation plans, but which had already ceased operations before the Project, was identified. This business will not be subject to business relocation but will be eligible for compensation for its affected assets. To date, no businesses operating informally on previously expropriated land have been identified. Such businesses may include, for example, roadside vendors operating on land previously expropriated for existing state roads, as is commonly encountered in motorway projects. Should any such businesses be identified in the future, the associated impacts and eligibility for assistance will be assessed in accordance with this RAP and in consultation with the Lenders and the LESA, noting that such parcels would not be subject to Project-related expropriation by KGM, as they were expropriated in the past.

Table 3-22. Summary Breakdown of Businesses

Section	District	Neighbour hood	Number of Parcels Containing Business Structures	Number of Affected Businesses			
				(A) Businesses that will Relocate	(B) Businesses that will not Relocate	(C) Non-operational Businesses	Total
Section 1 (KM 0 – 35)	Silivri	Gümüşyaka	4	0	3	0	**3**
Sub-total Section 1			**4**	**0**	**3**	**0**	**3**
Section 2 (KM 35 – 70)	Süleymanpaşa	Gazioğlu	2	0	2*	0	**2**
	Süleymanpaşa	Kayı	3	1	1	1	**3**
Sub-total Section 2			**5**	**1**	**3**	**1**	**3**
Section 3 (KM70 – 105)	Tekirdağ	--	0	0	0	0	**0**
Sub-total Section 3			**0**	**0**	**0**	**0**	**0**
Total			**9**	**1**	**6**	**1**	**8**

Source: SPV, Expropriation Plans (March 2026) and Structure Valuation Forms (May 2026); RAP Field Surveys (February – March 2026).

(*) Field surveys have not been conducted for the two businesses in Gazioğlu neighbourhood. These businesses have been considered as businesses that will not relocate (surveys TBD following cadastral approval of expropriation plans). Their impact status will be determined during the survey activities following the cadastral approval of Section 2.

Table 3-23 lists the affected businesses. According to the Expropriation Plans and based on consultations with affected people, affected businesses include the following main categories:

- Pallet Workshop
- Marbel processing facility
- Precast manufacturing facility
- Fuel storage facility
- Flower vendor
- Roadside vendors (informal on road parcels expropriated in the past for existing state-road)

The RAP field surveys held in February – March 2026 targeted full census of the affected businesses. The Expropriation Plans do not specify the occupancy status or identify the users (e.g. owners, formal tenants, or informal occupants) of the affected businesses. Some of the users could be identified during the RAP field surveys held in February – March 2026.

The continuity and status of business operations will be closely monitored throughout RAP implementation, and the SPV will maintain ongoing consultations with business owners and operators as part of the SEP. Additionally, the Project's Grievance Mechanism will remain accessible to all stakeholders, including affected businesses, throughout both the construction and operation phases of the Project. Figure 3-8 presents photographs of selected businesses to provide a general overview.

Gümüşyaka, Silivri (7878/5) – KM 12+733 Timber and Pallet Workshop – **No relocation**, loss of land and structure	Gümüşyaka, Silivri (7878/1) – KM 12+736 Pallet Workshop – **No relocation**, loss of land and structure
Gümüşyaka, Silivri (7860/17 and TH1) – KM 12+733 Pallet Workshop – **No relocation**, loss of land and structure	Süleymanpaşa, Kayı (0/785) – KM 60+500 **Vacant** structures – **No relocation**
Süleymanpaşa, Kayı (0/1545) – KM 60+500 Precast Manufacturing – **No relocation**, loss of land	Süleymanpaşa, Kayı (0/1570) – KM 60+500 Marble Processing – Structure affected, **to be relocated**

Figure 3-8. Photographs of Selected Businesses

Table 3-23. List of Parcels with Business Structures

No	Section	KM Chainage	Business Code	Business Activity	Type of Impact	Status of Operation	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Land Registry Type	Land Ownership	Affected Structure	Actual User/Business Owner	Number of Employees (As of February 2026)	RAP Survey Questionnaire
1	Section 1 (KM 0 – 35)	12+733	BUS-7878/5	Timber and Pallet Workshop	No relocation, partial loss of land and structure	In operation	Silivri	Gümüşyaka	7878/5	8,044.44	1,273.20	Agricultural Land *("Tarla")*	Private ("*S.İ.K.*")	Structure A Wire Mesh (According to Structure Valuation Forms) Structure B Door (According to Structure Valuation Forms) Structure C Concrete Floor (According to Structure Valuation Form)	Formal User *("C.A")*	Full-Time: 5	**Yes**
2		12+736	BUS-7878/1	Pallet Workshop	No relocation, partial loss of land and structure	In operation	Silivri	Gümüşyaka	7878/1	3,817.63	1,266.41	Agricultural Land *("Tarla")*	Private *("K.K and A.Ş.K.")*	Structure A Wire Mesh (According to Structure Valuation Forms) Structure B Office Building (According to Structure Valuation Forms) Structure C Concrete Floor (According to Structure Valuation Form) Structure D Concrete Floor (According to Structure Valuation Form) Structure E Container (According to Structure Valuation Form) Structure F Container (According to Structure Valuation Form) Structure G Concrete Floor (According to Structure Valuation Form)	Formal User *("A.G")*	Full-Time: 2	**Yes**
3		12+885	BUS-7860/17	Pallet Workshop	No relocation, partial loss of land and structure	In operation	Silivri	Gümüşyaka	7860/17	7,274.02	1,687.41	Outbuilding and Agricultural Land *("Müştemilat ve Tarla")*	Private *("Y.Y. Ambalaj Sanayi ve Ticaret Anonim Şirketi")*	Structure A Iron Door (According to Structure Valuation Forms) Structure B Concrete Floor (According to Structure Valuation Forms)	Formal User *("O.Z")*	Full-Time: 10 Part-Time: 3	**Yes**

No	Section	KM Chainage	Business Code	Business Activity	Type of Impact	Status of Operation	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Land Registry Type	Land Ownership	Affected Structure	Actual User/Business Owner	Number of Employees (As of February 2026)	RAP Survey Questionnaire
														Structure C Canopy (According to Structure Valuation Form) Structure D Pavement (According to Structure Valuation Form) Structure E Canopy (According to Structure Valuation Form) Structure F Canopy (According to Structure Valuation Form			
									TH1	1,276.60	1,276.60	Non-Registered (“*Tescil Harici*”)	--	Structure A Iron Door Structure Valuation Forms) Structure B Concrete Floor (According to Structure Valuation Forms) Structure C Canopy (According to Structure Valuation Form) Structure D Fence (According to Structure Valuation Form) Structure E Pavement (According to Structure Valuation Form)			
4	Section 2 (KM 35 – 70)	51+360; 1+000	BUS-0/548	Landscaping and floristry	TBD during Section 2 surveys	TBD	Süleymanpaşa	Gazioğlu	0/548	8,400.00	7,863.34	Agricultural Land *(“Tarla”)*	Private *(“M.B.”)*	TBD	TBD	TBD	TBD
5		51+360; 2+000	BUS-0/1085	Flower business	TBD during Section 2 surveys	TBD	Süleymanpaşa	Gazioğlu	0/1085	352,00	TBD	Urban Plot (*“Arsa”)*	TBD	TBD	TBD	TBD	TBD
6		60+317	--	Fuel Storage Facility	No relocation	No operation	Süleymanpaşa	Kayı	0/785	9,550.00	7,916.15	Fuel storage facility with associated garden, administrative office, masonry storage building, and fruit (“*Bahçeli benzin deposu ve yazıhane ve kargir depo ve meyvelik*”)	Private *(“S.E.”)*	Structure A Ruin Building (According to Structure Valuation Form) Structure B Ruin Building (According to Structure Valuation Form) Structure C Ruin Building	Vacant	--	No

No	Section	KM Chainage	Business Code	Business Activity	Type of Impact	Status of Operation	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Land Registry Type	Land Ownership	Affected Structure	Actual User/Business Owner	Number of Employees (As of February 2026)	RAP Survey Questionnaire
														(According to Structure Valuation Form) Structure D 3 Storeys Ruin Building (According to Structure Valuation Form) Structure E Ruin Building (According to Structure Valuation Form) Structure F Ruin Building (According to Structure Valuation Form) Structure G Canopy (According to Structure Valuation Form) Structure H Canopy (According to Structure Valuation Form) Structure I Wall (According to Structure Valuation Form)			
7		60+424	BUS-0/1545	Precast Manufacturing	No relocation, partial loss of land	In operation	Süleymanpaşa	Kayı	0/1545	10,150.81	450.14	Urban Plot *("Arsa")*	Private *("T.H İnş ve Tic.Ltd.Şti")*	--	--	--	No
8		60+448	BUS-0/1570	Marble Processing	**To be relocated**	In operation	Süleymanpaşa	Kayı	0/1570	5,197.19	1,783.80	Agricultural Land *("Tarla")*	Private ("*T.G İnşaat Sanayi Ticaret Anonim Şirketi*")	Structure A Office (According to Structure Valuation Form) Structure B Concrete Floor (According to Structure Valuation Form) Structure C Concrete Floor (According to Structure Valuation Form) Structure D Wire Mesh (According to Structure Valuation Form) Structure E Concrete Floor	Formal User *("İ.E")*	Full-Time: 9	**Yes**

No	Section	KM Chainage	Business Code	Business Activity	Type of Impact	Status of Operation	District	Neighbourhood	Parcel No.	Parcel Area (m2)	Expropriated Area (m2)	Land Registry Type	Land Ownership	Affected Structure	Actual User/Business Owner	Number of Employees (As of February 2026)	RAP Survey Questionnaire
														(According to Structure Valuation Form) <u>Structure F</u> Concrete Ramp (According to Structure Valuation Form) <u>Structure G</u> Warehouse (According to Structure Valuation Form) <u>Structure H</u> Workshop Building (According to Structure Valuation Form) <u>Structure I</u> Canopy (According to Structure Valuation Form) <u>Structure J</u> Wire Mesh (According to Structure Valuation Form) <u>Structure K</u> Wall (According to Structure Valuation Form) <u>Structure L</u> Crane Rail and Concrete (According to Structure Valuation Form)			
--	Section 3 (KM 70 – 105)	--	None	--	--	--	--	--	--	--	--	--	--	--			

TBD: To be determined during RAP implementation.

Note: Colour is used for visual emphasis only. All meanings are also conveyed through text; Yes" indicates that the RAP survey questionnaire was completed. "No" indicates it was not completed

3.5. Affected Special-use Assets

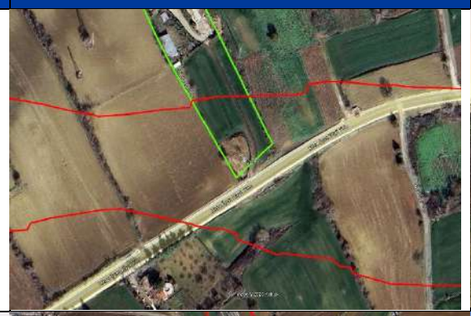
The special-use assets refer to non-residential and non-commercial assets used by affected people for special purposes. In Section 2 of the Motorway, two such assets were identified based on the review of expropriation plans and RAP field surveys:

- **Dog Shelter (KM 60+439):**
    - The dog shelter was established by an animal (stray dogs) welfare volunteer. The founder obtained the land through a lease arrangement. The shelter previously operated on another parcel located on the opposite side of the road and has been operating at the current location for approximately 12 years. The total land parcel is approximately 4.5 decares.
    - The shelter is operated entirely on a **voluntary basis** and has 3 – 4 volunteer workers. One of the volunteers stays at the shelter during the night.
    - The shelter has **no commercial nature**. The activity is maintained through the volunteer's own means and donations. It has no official status or institutional registration.
    - The current shelter site contains movable materials (such as containers, fencing systems and various temporary shelter structures) as well as trees.
    - The volunteers are aware of the expropriation process and acknowledge that the facility will need to be relocated. Research has been carried out on 3 – 4 alternative parcels available for lease for relocation, and evaluations are ongoing. It was noted that the new site needs to be vacant, allow for obtaining permits for electricity and water connections, be suitable for fencing, and be accessible for the delivery of cargo and donated animal food.
    - Once a suitable location is identified, the relocation process will be initiated. The relocation will be implemented in phases and is expected to take approximately 2 – 3 months. Initially, equipment and materials will be moved to establish appropriate conditions for sheltering the dogs, after which the relocation will be gradually completed. It was indicated during the RAP consultations that there is a total of 12 containers used for animal shelter purposes and the relocation would require multiple trucks, as well as cranes, excavators, and additional labour for transporting and installing equipment. Furthermore, additional infrastructure investments would be required at the new site, including reinstallation of cages, water access, establishing an electricity connection, installing perimeter fencing for security, and ground levelling. Permits may be required from Tekirdağ Municipality and the Provincial Directorate of Agriculture and Forestry, which will be clarified by the volunteer in due course.
    - The shelter currently provides care for approximately 500 dogs. It is planned that the dogs will be transported to the new shelter using appropriate pet taxi vehicles depending on the size of the animals.
    - Project CLOs have been engaging with the affected people. During the recent engagement on 10 March 2026, the shelter representatives were informed that land entry on this parcel is **not** planned before **Q2 2027** according to the current Project work schedule.

- **Pet Cemetery (KM 56+300, Gündoğdu Parcel No: 200/30):**
    - Based on observations made during the RAP scoping field visit (December 2025), the site appears to have been used as a pet cemetery for approximately less than a year (to be confirmed). Multiple graves of dogs and cats were observed. The total parcel area is 9,342.96 decares, while the cemetery is located in the southern corner of the parcel and covers an area of approximately 600 m².
    - Consultations were held by the SPV CLOs with the landowner and a relative of the cemetery operator on **28 April and 30 April 2026**. Approximately **60 pet graves** were observed within the portion of the parcel overlapping with the Motorway expropriation corridor. There are also 37 beehives and an agricultural storage structure within the remaining portion of the parcel, which remains outside the expropriation boundary.
        - **Consultation with the landowner**: The first consultation was held with the landowner, who stated that he had purchased the land approximately two years earlier and that the pet graves already existed at the time of purchase. He explained that the cemetery had been inherited from the previous owner and that detailed information regarding the operation of the cemetery was known by a relative of the cemetery operator.
        - **Relative of the cemetery operator**: A second consultation was conducted with a relative of the cemetery operator. The consultee stated that the cemetery operator (an attorney) organises burial arrangements with pet owners. According to the information provided, agreements related to the graves were generally valid for approximately **two years** and could continue subject to payment renewal. However, the consultee noted that he does not have clear information as to whether these arrangements were formally documented in writing.
    - The SPV conducted an additional consultation with the cemetery operator (attorney) on **12 May 2026** to clarify the operational structure of the cemetery and discuss the process. During the meeting, the operator requested to be informed prior to the commencement of construction activities and asked for the expropriation boundaries to be clearly defined. They also requested vehicle and equipment support for the relocation of graves outside the expropriation area. It was stated that, provided such support is made available, the graves could be relocated amicably, allowing the area to be used by the Project without any issues.

The list of parcels with affected special-use assets is presented in Table 3-24.

Table 3-24. List of Parcels with Affected Special-use Assets that will be Relocated

No	Section	Structure	Status	KM Chainage	District	Neighbourhood	Parcel No.	Land Registry Type	Parcel Area (m2)	Expropriated Area (m2)	Landowner	Land user	Affected Structures	Google Earth Image (based on most recent imagery)	Site Photos
1.	Section 2 (KM 35 – 70)	Pet Cemetery	In use	56+300	Süleymanpaşa	Gündoğdu	200/30	Agricultural Land	9,342.96	4,060.07	Private (E.G)	TBD through RAP surveys in Section 2	Pet graves		
2.	Section 2 (KM 35 – 70)	Dog shelter	In use	60+439	Süleymanpaşa	Kayı	0/1615	Agricultural Land	4,522.13	4,522.13	Private (N.G.)	Formal tenant of the land, owner of the structures (Tekirdağ Köpekköy) Formal tenant (Tekirdağ Köpekköy)	Various movable and immovable structures (such as containers, fencing systems, and temporary shelter structures) and trees		
							0/1572	Agricultural Land	4,481.31	4,481.31	Private (Y.T.)				

Note: Colour is used for visual emphasis only. All meanings are also conveyed through text; Yes" indicates that the RAP survey questionnaire was completed. "No" indicates it was not completed.

3.6. Temporary E&S Impacts during Construction

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

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

With regard to potential impacts on residential structures, particularly those related to blasting and vibration, the SPV will monitor any damage arising from blasting and implement mitigation measures and/or corrective actions, in accordance with the Project's ESIA.

3.7. Potential E&S Impacts during Operation

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

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

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

3.8. Other Impacts

3.8.1. Displacement of Existing Infrastructure Belonging to Other Institutions

KÖSOB initiated consultations with relevant institutions in 2023 through official correspondence, based on the 1/5,000-scale route, to identify existing and planned infrastructure facilities (e.g. energy transmission lines, drinking water, wastewater and stormwater systems, natural gas pipelines, etc.) that overlap with the Project. Currently, the consultations and correspondence are ongoing based on the 1/1,000-scale route.

In addition to official correspondence, verbal consultations with the relevant institutions are ongoing regarding their existing and planned infrastructure and above ground facilities that intersect with the Motorway route.

Based on the information received from each institution, the need for displacement is assessed and intersection points with the route are determined, intersections of existing and planned infrastructure with the Project route are analysed by design teams, and subsequently, corresponding displacement projects are prepared and submitted to KGM – KÖSOB and relevant institutions for approval. This is a **dynamic process** that will continue throughout the Project duration, which is carried out in constant coordination with the institutions.

Table 3-25 presents examples of infrastructure and facilities identified through this process and considered in the Project design in consultation with the relevant institutions.

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

- Potable Water Pipelines:
  - Directorate of State Hydraulic Works (DSI)
  - İstanbul Water and Sewerage Administration (İSKİ)
  - Tekirdağ Water and Sewerage Administration (TESKI)
- Electricity Lines:
  - Boğaziçi Electricity Distribution Company

- Türkiye Electricity Distribution Corporation (TEDAS) – Regional Directorate
- Türkiye Electricity Transmission Corporation (TEİAŞ) – Regional Directorate
- Trakya Electricity Distribution Company (TREDAŞ)

- Natural Gas Pipelines:
  - Petroleum Pipeline Corporation (BOTAŞ)
  - Çorlu Natural Gas Distribution Company (ÇORDAŞ)
  - İstanbul Gas and Natural Gas Distribution Company (İGDAŞ)
  - Trakya Natural Gas Distribution Company (GAZDAŞ)
  - Uludağ Gas Distribution Company (UEDAŞ)
- North Atlantic Treaty Organization (NATO) Lines
- Telecommunication and Fiber Cable Lines:
  - Turkcell Communication Services Company
  - Türk Telekom Regional Directorate
  - Vodafone Telecommunications Company

Table 3-25. Examples of Infrastructure and Facilities Identified through Correspondence between the Project and Relevant Institutions

Institution / Party	Facilities and Potential Overlaps Relevant to Displacement Planning
DSİ 11th Regional Directorate (State Hydraulic Works)	Tekirdağ Hayrabolu Project İnecik–Dedeçik Dams Conveyance Pipeline İnecik 1–2 Dam Irrigation Project Tekirdağ Çorlu Yenice-2 Reservoir and Irrigation Project (construction ongoing; tender awarded)
İGDAŞ (İstanbul Gas Distribution Inc.)	Existing and planned gas infrastructure and superstructure facilities
İLBANK (İstanbul Regional Directorate)	Tekirdağ Central Sewerage and Stormwater Construction Works Tekirdağ Central Drinking Water Transmission Line – existing and planned pipeline routes
GAZDAŞ (Trakya Region Natural Gas Distribution Inc.)	Existing natural gas infrastructure facilities
İBB İSKİ (İstanbul Water and Sewerage Administration)	Planned Çanta Central Service Depot
Ministry of National Defence – Fuel Supply and NATO POL Facilities Operations Directorate	9 NATO fuel pipeline crossings identified
TCDD 1st Regional Directorate (Turkish State Railways)	Tekirdağ–Muratlı Railway Line Çorlu–Muratlı–Martas Railway Line Project
TEİAŞ (Turkish Electricity Transmission Corporation)	Planned Sütlüce 3–Çorlu 380 kV Electricity Transmission Line (ETL) Planned Rumeli–Çanta 154 kV Transformer Station Site Rumeli TS – 2 existing 154 kV ETL connections
TESKİ (Tekirdağ Water and Sewerage Administration)	Existing water and sewerage infrastructure facilities
TREDAŞ (Thrace Electricity Distribution Inc.)	Electricity distribution lines (medium-voltage overhead line crossings)

Source: SPV, March 2026. official correspondence with relevant institutions.

Displacement Protocols

For infrastructure and facilities identified for displacement, **protocols will be signed between the Project and the relevant institutions.** These protocols will outline the displacement procedures to be implemented and the technical specifications to be fulfilled. During Project implementation, the existing infrastructure intersected by the Motorway will be displaced – i.e., disconnected or removed and subsequently reinstalled or reconnected at the same location within the Motorway's expropriation corridor, so that it remains beneath the road alignment – in accordance with the conditions of corresponding protocols. According to the current Project schedule, protocol execution works are planned to be undertaken between **February 2026** and **August 2027.**

Where necessary, permanent protection measures will be developed and implemented by the SPV and EPC Contractor, in coordination with the relevant institutions and subject to approval by KGM. These measures may include the application of suitable protective materials (e.g., soil or concrete) or increasing the diameter of the replacement pipes to enhance durability. The relevant institutions may impose additional technical requirements regarding the specifications of the infrastructure to be reconstructed, the distance to be maintained between facilities, restrictions on the use of explosives, or the need for technical supervision during displacement works. These requirements will be implemented by the Project. Such requirements are included in the official correspondence provided by the relevant institutions, recorded by the Project design teams in their displacement related logs, and incorporated into the design where required.

In this process, the Project's primary objective is to carry out the displacement works – provided sufficient space is available and technically feasible – within the Motorway's expropriation corridor, thereby avoiding additional expropriations with the approval of KGM – KÖSOB. However, if there are facilities within the expropriation corridor that cannot be displaced there, such facilities will be relocated outside the expropriation area, to locations deemed appropriate and designated by the authorities and KGM - KÖSOB. After obtaining the necessary permits and completing land acquisition, they will be re-established.

Land Acquisition for Infrastructure Displacement

Any **additional land requirements** along the displacement routes will be addressed by KGM - KÖSOB through land acquisition procedures in accordance with national legislation. This process will include preparation of expropriation plans in case of private lands, securing land ownership (through allocation, expropriation or easement rights, as appropriate) and obtaining the necessary permits (e.g., forest permits) for the new locations and routes.

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

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

Notification of Local Communities

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

Environmental, Health and Safety (EHS) Risks and Impacts associated with Displacement of Existing Infrastructure

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

3.8.2. Cumulative Land Acquisition and Resettlement Impacts

According to the Good Practice Handbook of IFC on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013), cumulative impacts are defined as follows:

> "***Cumulative impacts*** *are those that result from the successive, incremental, and/or combined effects of an action, project, or activity (collectively referred to in this document as "developments") when added to other existing, planned, and/or reasonably anticipated future ones. For practical reasons, the identification and management of cumulative impacts are limited to those effects generally recognised as important on the basis of scientific concerns and/or concerns of affected communities.*"

Cumulative land acquisition impacts may arise when landowners or users are affected by **multiple, overlapping land-related acquisitions** linked to other developments in the region or directly related to the Project. Households affected by Project's cumulative land acquisition impacts will be considered among the vulnerable groups.

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

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

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

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

The RAP field surveys conducted with the settlement heads (mukhtars) and the affected households include questions aimed at identifying settlements and households that may be subject to cumulative land acquisition impacts.

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

(i) Lands affected by other regional developments and projects

Other projects and developments in the region have been identified based on the Project's official correspondence with the relevant institutions, the Project ESIA – Chapter 17 ("Cumulative Impact Assessment"), RAP interviews with the mukhtars (December 2025), and a review of public resources, as listed in Table 3-26.

During the RAP interviews held with the mukhtars of the affected settlements, as well as with affected households, the expropriation works undertaken by the following institutions or projects/developments were indicated to cause cumulative impacts on the settlements:

No major cumulative displacement impact was referred to by the respondents.

Table 3-26. Other Projects and Developments in the Region and Potential for Cumulative Displacement Impacts

No.	Industry/Sector	Other Project/ Development	Source of Information	Approximate Motorway KM	Distance to the Motorway (m)	Status of Other Project/ Development	Settlement (Valued Social Component)	Cumulative Displacement Impact Potential
1.	**Infrastructure** - Road	Malkara-Çanakkale Motorway including 1915 Çanakkale Bridge	ESIA, March 2025.	105+000	0 (overlap)	Operation	Ahievran, Malkara	**Yes.** The settlement has previously been affected by the 2017 expropriation for the operational Malkara–Çanakkale Motorway, which connects to the Kınalı – Malkara Project in Ahievran, resulting in cumulative impacts. It was also reported that some affected landowners have continued cultivating their parcels since the expropriation.
2.	**Infrastructure** - Road	Northern Marmara Motorway – Kınalı – Odayeri Section	Public	0+000	0 (overlap)	Operation	Alipasa, Silivri	**Yes.** The two motorway projects connect within the settlement, which may lead to cumulative impacts.
3.	**Infrastructure**- Rail	Çorlu – Martaş Railway	TCDD official letter (dated 8 May 2024)	21+500	0 (overlap)	Not operational or under construction (according to Google Earth, Mar 2026)	Seymen, Çorlu	**Yes.** The planned railway line overlaps with the Kınalı – Malkara Project at two locations within Seymen neighbourhood, which may lead to cumulative land acquisition impacts
4.	**Infrastructure**- Rail	Tekirdağ – Muratlı Railway	RAP – Mukhtar interview (December 2025)	62+792	0 (overlap)	Construction completed	Kayı, Süleymanpaşa	**Yes.** Under the Tekirdağ–Muratlı Railway constructed in the early 2000s, some of the parcels within the neighbourhood were expropriated.
5.	**Power** – Electricity transmission	Electricity transmission line	RAP – Mukhtar interview (December 2025)	60+350	0 (overlap)	Construction completed	Kayı, Süleymanpaşa	**Yes.** Electricity transmission poles pass through the lower parts of the neighbourhood. Following the objections of the residents' to routing the line through agricultural areas, the poles were relocated to the pasture area. Compensation payments related to this expropriation were reportedly received approximately one year later.
6.	**Urban development**	City cemetery	RAP – Mukhtar interview (December 2025)	63+000	1,000.00	Existing	Kayı, Süleymanpaşa	**No.** The construction of the city cemetery affected approximately 650 decares of pasture in the Kayı neighbourhood.
7.	**Infrastructure** - Road	Tekirdağ-Hayrabolu Road	RAP – Mukhtar interview (December 2025)	65+650	0 (overlap)	In operation	Yağcı, Süleymanpaşa	**Yes.** The Tekirdağ–Hayrabolu state road divided the pasture area of the neighbourhood into two sections and has been the main source of impact. The Kınalı – Malkara Project is also expected to divide one of the remaining pasture areas (Parcel No. 101 and 41), resulting in cumulative impacts. This pasture is a multi-shareholder privately owned pasture (approximately 700 shareholders).
8.	**Power** – Wind	Çanta WPP	Energy Market Regulatory Authority	8+850 – 10+600	0 (overlap)	In operation	Various locations	**Yes.**

No.	Industry/Sector	Other Project/ Development	Source of Information	Approximate Motorway KM	Distance to the Motorway (m)	Status of Other Project/ Development	Settlement (Valued Social Component)	Cumulative Displacement Impact Potential
			(EMRA) official letter (dated 26 March 2024)		450 (Closest turbine)			The WPP is located in close proximity to the Project area, therefore cumulative displacement impacts may arise where the same land users or parcels are affected by both projects.
9.	**Power** – Wind	Yeniciflik WPP	EMRA official letter (dated 26 March 2024)	37+200 – 38+600 44+800 – 48+300	0 (overlap) 100 (Closest turbine)	Planned	Various locations	**Yes.** The WPP licence area overlaps with the Project alignment, with some of the turbines located on both sides of the Motorway corridor. Therefore, cumulative displacement impacts may arise where the same land parcels or land users are affected by both projects.
10.	**Power** – Wind	Balabanlı WPP	EMRA official letter (dated 26 March 2024) RAP – Mukhtar interview (December 2025) ESIA, March 2025	42+000	0 (overlap) 2,100 (Closest turbine)	In operation	Balaban, Silivri	**Yes.** Previous expropriation for WPPs in the neighbourhood has left some parcels with only a limited remaining area (e.g., approximately 300 m²), which is insufficient for agricultural use, representing a cumulative impact.
11.	**Power** – Electricity transmission	Sütlüce 3 – Çorlu 380 kV ETL	Public	66+090	0 (overlap)	In operation	Various locations	**Yes.** The transmission line overlaps with the Kınalı – Malkara Project at four locations within Seymenli and Yağcı neighbourhoods, which may lead to cumulative land acquisition impacts.
12.	**Power** – Wind	Mila-7 WPP	EMRA official letter (dated 26 March 2024)	94+000	0 (overlap) 100 (Closest turbine)	Planned	Kınıklar, Süleymanpaşa	**Yes.** The WPP is located in close proximity to the Project area, therefore cumulative displacement impacts may arise where the same land users or parcels are affected by both projects.
13.	**Power** – Wind	Süleymanpaşa WPP	EMRA official letter (dated 26 March 2024)	76+000	0 (overlap) 330 (Closest turbine)	Planned	Güveçli and Seymenli Süleymanpaşa	**Yes.** The WPP is located in close proximity to the Project area, therefore cumulative displacement impacts may arise where the same land users or parcels are affected by both projects.
14.	**Power** – Wind	Kizil WPP	EMRA official letter (dated 26 March 2024)	92+650 – 93+500 98+000 – 101+000	0 (overlap) 100 (Closest turbine)	Planned	Various locations	**Yes.** The WPP licence area overlaps with the Project alignment, with some of the turbines located on both sides of the Motorway corridor. Therefore, cumulative displacement impacts may arise where the same land parcels or land users are affected by both projects.
15.	**Mining**	2A Group Quarry and Crushing and Screening Plant (540,000 tons/year)	ESIA, March 2025	90+000	3,900.00	Status unknown	Karansıllı, Süleymanpaşa	**No.**

No.	Industry/Sector	Other Project/ Development	Source of Information	Approximate Motorway KM	Distance to the Motorway (m)	Status of Other Project/ Development	Settlement (Valued Social Component)	Cumulative Displacement Impact Potential
16.	**Infrastructure** – Port	Port Capacity Increase	ESIA, March 2025	60+000	4,800.00	Under construction	Yavuz, Süleymanpaşa	**No.**
17.	**Infrastructure** – Waste	Sludge Drying Plant	ESIA, March 2025	34+500	2,800.00	Status unknown	Yenice, Çorlu	**No.**
18.	**Manufacturing**	Steel Mill and Rolling Mill Facilities Capacity Increase (700,000 tons/year)	ESIA, March 2025	20+200	3,000.00	Under construction	Sultanköy, Marmaraereğlisi	**No.**

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

This category includes parcels affected by both the Kınalı – Malkara Motorway and other Project components.

During the RAP field surveys conducted with the affected households in February – March 2026 (Section 1 and Section 3), none of the surveyed households reported land affected by both the Motorway and ancillary Project facilities. This may be attributed to the fact that the locations of the ancillary facilities are not yet widely known to the public.

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

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

According to the expropriation plans, a large number of landowners have multiple parcels affected by the Project. Table 3-27 presents the **number of landowners with multiple parcels** affected by the Project, disaggregated by section and the number of parcels affected. A total of 465 unique landowners hold more than one affected parcel across all three sections. The **majority** of these landowners (**331**) have two affected parcels, while 14 landowners have **more than five** affected parcels, all of whom are located in Section 1.

It should be noted that a portion of these landowners who own multiple affected parcels have acquired them for investment purposes, rather than for agricultural production. Therefore, land users with multiple affected parcels have been identified through the RAP field surveys (February – March 2026) to determine the actual individuals potentially affected by cumulative displacement impacts.

Table 3-27. Number of Landowners with Multiple Parcels Affected

Section	Total Number of Private Parcels	Total Number of Landowners (as of July 2026[55])	Number of Unique Landowners with					
			2 affected parcels	3 affected parcels	4 affected parcels	5 affected parcels	More than 5 affected parcels	Total
Section 1	1,068	11,371	193	44	13	6	14	**270**
Section 2[56]	747	9,357	28	3	1	0	0	**32**
Section 3	438	1,262	110	40	11	2	0	**163**
Total	2,253	21,990	**331**	**87**	**25**	**8**	**14**	**465**

Table 3-28 presents the land users (owner or non-owner) identified through the RAP field surveys (February–March 2026 in Section 3) as having **multiple affected parcels**, along with their cumulative loss or productive area.

A total of **47 land users** (out of 84 individuals included in the survey sample, corresponding to 56%) have multiple parcels affected by the Project, with individual parcel loss ranging from 2 to 10 parcels with varying areas. The majority of land users (30 out of 47) have two or three affected parcels. However, **eight land users** (9.5% of the individuals surveyed) **face a percent loss exceeding 20% of their total productive area** – marked in **red** font – indicating significant cumulative displacement impacts.

[55] Section 3.2.1 for the identification process of landowners and the potential for change in figures throughout the expropriation process.
[56] During the RAP preparation, approved expropriation plans for Section 2 were available only for KM 58 – 60. Cadastral approval of the expropriation plans for the remainder of Section 2 was obtained in May 2026. This analysis will be updated following the approved expropriation plans and structure valuation forms for the full alignment of Section 2 become available.

Table 3-28. Land Users with Multiple Affected Parcels and Cumulative Displacement Impacts

Section	No.	Settlement	Land user	Number of Parcels affected by the Project	Cumulative Impact		
					Approximate Total Productive Area (decar)	Approximate Total Productive Area Lost (decar)	Percent Lost (%)
Section 1		TBD	TBD	TBD	TBD	TBD	TBD
Section 2		TBD	TBD	TBD	TBD	TBD	TBD
Section 3	1	Ahievren	Ya**Ta**	2	1,020	12.10	1.2
	2	Ahievren	Sa**Pa**	3	408	11.03	2.7
	3	Ahievren	Mu**Kö**	4	155	11.29	7.3
	4	Akçahalil	Se**Öz**	4	76	37.16	48.9
	5	Akçahalil	Em**Ca**Öz**	3	60	5.61	9.4
	6	Akçahalil	İm**Ay**	2	220	6.48	2.9
	7	Akçahalil	Na**Du**	2	250	12.28	4.9
	8	Akçahalil	Hü**Se**	2	52	12.13	23.3
	9	Akçahalil	Ve**Me**	4	480	28.54	5.9
	10	Kınıklar	Se**Ye**	2	232	47.18	20.3
	11	Yenice	Me**Da**	2	231	12.63	5.5
	12	Yenice	Öm**Fa**Öz**	3	450	23.65	5.3
	13	Yenice	Ce**Po**Yı**	7	822	60.31	7.3
	14	Yenice	İs**Öz**	3	190	16.43	8.6
	15	Nusratfakı	İb**Se**	2	160	8.98	5.6
	16	Nusratfakı	Me**Mi**	4	650	88.43	13.6
	17	Tekirdağ	İz**Ün**	10	1,500	169.16	11.3
	18	Nusratfakı	Yü**Ko**	4	152	2.61	1.7
	19	İnecik	Mu**To**	4	696	16.11	2.3
	20	İnecik	Mu**To**	3	87	4.88	5.6
	21	Nusratfakı	Ah**Mi**	2	261	13.42	5.1
	22	İnecik	Fa**Te**	5	650	86.27	13.3
	23	İnecik	Şü**Gü**	2	58	12.62	21.8
	24	Mahramlı	Me**Ka**	2	148	5.97	4
	25	İnecik	Hü**Yü**	2	242	2.60	1.1
	26	İnecik	Ca**Va**	4	853	18.26	2.1
	27	İnecik	Se**Yü**	2	160	16.60	10.4
	28	İnecik	Ah**Ur**	3	57	37.75	66.2
	29	İnecik	Fe**İn**	2	400	28.43	7.1
	30	İstanbul	Şe**Gü**	4	802	19.43	2.4
	31	Yağcı	Me**Ba**	2	154	14.40	9.4
	32	Seymenler	Re**Gü**	5	118	18.28	15.5
	33	Seymenler	İl**Er**	3	280	12.16	4.3
	34	Seymenler	Hü**Se**	2	370	8.79	2.4
	35	Seymenler	Al**Ka**	4	285	36.55	12.8
	36	Yağcı	Şe**Mi**	2	960	19.86	2.1
	37	Yukarı Kılıçlı	Er**Av**	3	195	36.23	18.6
	38	Tekirdağ	İs**Kı**	5	53	37.09	70
	39	Güveçli	Ke**Kı**	3	75	18.63	24.8
	40	Güveçli	Hü**Ka**	3	189	12.22	6.5
	41	Güveçli	Re**Ka**	4	234	40.66	17.4
	42	Seymenli	Ta**Ör**	5	993	36.45	3.7
	43	Güveçli	Re**Ça**	3	595	7.92	1.3
	44	İnecik	Al**Te**	2	127	9.28	7.3
	45	İnecik	Re**Di**	2	160	20.01	12.5
	46	Nusratlı	Na**Ak**	2	246	6.57	2.7
	47	Hereke	İs**Uz**	2	85	25.94	30.5
Total surveyed individuals in Section 3							84

Source: RAP field surveys, February – March 2026.

During the RAP implementation phase, parcel-based identification and assessment of affected landowners and users will continue to be carried out by the RAP Implementation Team, and the PAPs will be included in the Project PAP Database with the relevant information, as outlined in Section 3.2.3.

As needed for significantly affected households, specific mitigation and management measures will be developed and implemented by the SPV during RAP implementation, and the specific budget for compensating cumulative impacts will be determined.

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

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

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

The SPV has adopted the relevant corporate policies and principles of the Limak Group of Companies that address gender issues, safeguard women's rights, and promote gender equality and equal opportunities – particularly within the workplace. These policies demonstrate the Group's commitment to fostering an inclusive and respectful working environment. The key adopted policies include (as of July 2026):

- Code of Ethics[57]
- Corporate Equality Policy
- Policy of Combatting Domestic Violence
- Stakeholder Involvement and Suggestion Complaint Policy
- Zero Tolerance Policy against Violence and Sexual Inviolability
- Procedure for Combatting the Violence and Violation of Sexual Inviolability

In addition to the corporate policies, the SPV has developed and adopted the following **Project-specific policies and plans[58], which are relevant to the management of gender-related risks and aspects of the Project:**

- Code of Ethical Conduct
- Ethical Disclosure Policy
- Human Rights Policy
- **Gender-based Violence and Harassment (GBVH) Management Plan**

While the Constitution of the Republic of Türkiye secures the rights of women and the Project will implement corporate policies, if not managed effectively, the land acquisition and resettlement processes associated with the Project may disproportionately impact women and exacerbate gender inequalities.

According to *Addressing GBVH in the Construction Sector (Social Development Direct, 2020 – supported by EBRD, CDC, and IFC)* and *Emerging Good Practice for the Private Sector on Addressing Gender-Based Violence and Harassment (GBVH) (jointly commissioned by IFC, EBRD, and CDC Group, 2020),* the risks of GBVH associated with land acquisition processes may include the following:

- Individuals who make decisions about resettlement and compensation can abuse this power to sexually exploit vulnerable community members, such as those in female-headed households. This risk is exacerbated in places where women cannot legally hold land titles and are therefore more easily removed from their land.
- Workers may be required to consult community members on plans for a project. In some cases, for example, when land acquisition and resettlement processes are required, this can involve workers having considerable power over the allocation of resources, such as compensation and livelihood restoration.

[57] https://www.limak.com.tr/files/CodeofBusinessEthicsPolicy.pdf
[58] Ethics and Compliance | Corporate | 1915Çanakkale

- Community engagement processes (for example during resettlement) can provide opportunities for workers to sexually exploit community members on the basis that it will improve their access to resources. This risk is heightened where community members are poor and/or already face discrimination.

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

The Project established its **Ethics Committee** in August 2025.

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

- **Compensation and Resettlement Assistance:** Eligible women owners and shareholders will receive compensation and resettlement support in accordance with the provisions outlined in the RAP –Entitlement Matrix. The Project will put in place mechanisms and monitor to ensure that they receive resettlement assistance in accordance with the provisions outlined in the Entitlement Matrix (Section 7.3), thereby promoting equitable access to support measures and benefits.

- **Inclusive Stakeholder Engagement:** Women members of all affected households will continue to be actively engaged throughout the implementation and monitoring of the RAP. The Project will employ both male and female Community Liaison Officers (CLOs) to support gender-responsive communication and outreach.

- **Zero Tolerance for GBVH at Workplaces:** The SPV's senior management will prioritise the prevention of GBVH across all Project-related workplaces by requiring full compliance of Project operations with relevant corporate policies and procedures.

- **Grievance Redress Mechanism for GBVH:** The Project's grievance mechanism will include dedicated procedures to ensure that GBVH-related complaints are reported and addressed through a confidential, survivor-centred, and safe process. Ethics Committee has been established in August 2025 for handling GBVH complaints.

- **Independent Evaluation of Sensitive Complaints:** In cases involving allegations against Project senior management or community members, and where trust in the Project's internal grievance process is compromised, external support from third-party gender experts, will be sought to ensure an impartial evaluation and resolution of GBVH-related complaints.

- **Capacity Building for Grievance Committee Members and RAP Implementation Team:** Members of the Ethics Committee and RAP Implementation Team will receive specialised training, delivered by qualified third-party gender experts, based on GBVH good practice guidance. This will equip them to effectively document, investigate, and respond to GBVH complaints.

- **Employee Training and Code of Conduct:** All Project employees and workers – including those hired directly and through EPC contractors – will receive induction and onboarding training on Project policies and procedures, including those related to GBVH. They will be required to sign a declaration confirming their understanding of the Code of Conduct and completion of GBVH-related training.

- **Monitoring of GBVH-related grievances as part of RAP Implementation:** Periodic RAP monitoring will include the tracking and evaluation of any GBVH-related grievances and the effectiveness of their resolution.

3.8.4. Affected Cultural Heritage (including Graves)

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "*Where a project affects critical cultural heritage, or where cultural heritage impacts are significant, the project may need to prepare a Cultural Heritage Management Plan under PS8. The requirement for such a plan would be determined as part of the ESIA. Where cultural heritage impacts are relatively minor, or only of local significance, they may be addressed in the RAP.*"

According to the Project's ESIA Report (March 2025) disclosed by the SPV in August 2025, registered and non-registered cultural heritage sites located inside and outside the expropriation corridor were identified by the ESIA Consultant (cultural heritage team). **The SPV design and E&S teams** have confirmed that the necessary avoidance measures have been implemented (such as a minor route revision at KM 6+800 and an interchange revision at the Tekirdağ East Interchange Area). As a result, only the following cultural heritage sites currently remain within the expropriation corridor, and there are **no** human graves or graveyards requiring relocation under the current design:

- HRM-7 (multi-stratigraphy mound) at KM 10+900 – 11+500
- HRM-8 (settlement) at KM 16+600

The expropriation plans reviewed as part of this RAP did not identify any cultural heritage sites, including graves or graveyards, within Project's expropriation corridor. As required by IFC PS8, a **Cultural Heritage Management Plan and Chance Find Procedure** has been prepared by the ESIA Consultant as part of the ESIA Report, to address and manage potential impacts on the cultural heritage sites. Any relocation activities required by the cultural heritage authorities will be undertaken in accordance with this Plan.

3.8.5. Potential Additional Expropriation Works

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

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

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

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

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

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

3.9. Limitations

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

- Section 1 (KM 0 – 35): Expropriation plans, lists, and structure valuation forms were available during the preparation of this RAP. No specific limitations were encountered.
- Section 2 (KM 35 – 70): As of the date of this document, expropriation plans and lists are available for Section 2; the cadastral approval process was **completed** for **KM 58 – 60** during the early phases of RAP and completed for the remainder of the route in this Section in May 2026. The available plans and lists for the full alignment in Section 2 have been analysed and are presented in this RAP.

  On the other hand, the structure valuation forms and reports were only available for KM 58 – 60 during the preparation of this RAP and RAP field surveys were conducted for this portion. The preparation of the structure valuation forms and reports for the remainder of this Section commenced in Q2 2026 following the cadastral approval of the expropriation plans and lists and is currently ongoing, with finalisation date further to be confirmed by KÖSOB. Even though this information was not available, a GIS-based review of the route has been conducted and the structures to be affected within the expropriation corridor has been identified by the RAP Consultant.

  The following data for the affected structures will be collected through RAP field surveys to be conducted in this Section (excluding KM 58 – 60) following the finalisation of cadastral approval process for the expropriation plans:

  - Type of structure (e.g. residential, non-residential, special-use, commercial)
  - Occupancy status of structures (e.g., permanent, non-permanent such as vineyard cottage, seasonal/weekend house etc., or vacant, ruin, etc.)
  - Ownership/tenancy status of users (e.g., owner, formal tenant, informal user)
  - In case of affected houses, socio-economic conditions of the residing households, including their sources of livelihood and vulnerabilities of household members, if any
  - In case of affected houses and businesses, if any, resettlement plans or alternatives that have been considered

  Once the valuation data for the full Section 2 becomes available, the RAP will be updated accordingly to incorporate up-to-date valuation data, and relevant baseline data and assessments and budget calculations for Section 2

  It should be noted that the valuation process is not envisaged to result in major changes to the impacts identified in this report, impact categories and entitlements defined in this RAP. Therefore, the principles outlined herein will remain applicable to any newly additional land or structures identified through these processes, if any.
- Section 3 (KM 70 – 105):

  Expropriation plans, lists, and structure valuation forms were available during the preparation of this RAP. No specific limitations were encountered.

4. Institutional and Legal Framework

4.1. Institutional Framework

The administrative structure in Türkiye comprises the central administration ("*merkezi idare*") and local administrations ("*yerinden yönetim*"). The central administrative units that have responsibilities related to the Project – particularly in terms of land acquisition and the implementation of the RAP – are outlined in the chart given in Figure 4-1. The chart shows the institutional structure of key government bodies under the Presidency of the Republic of Türkiye relevant to Project oversight, including five key ministries with their respective directorates and field organisations.

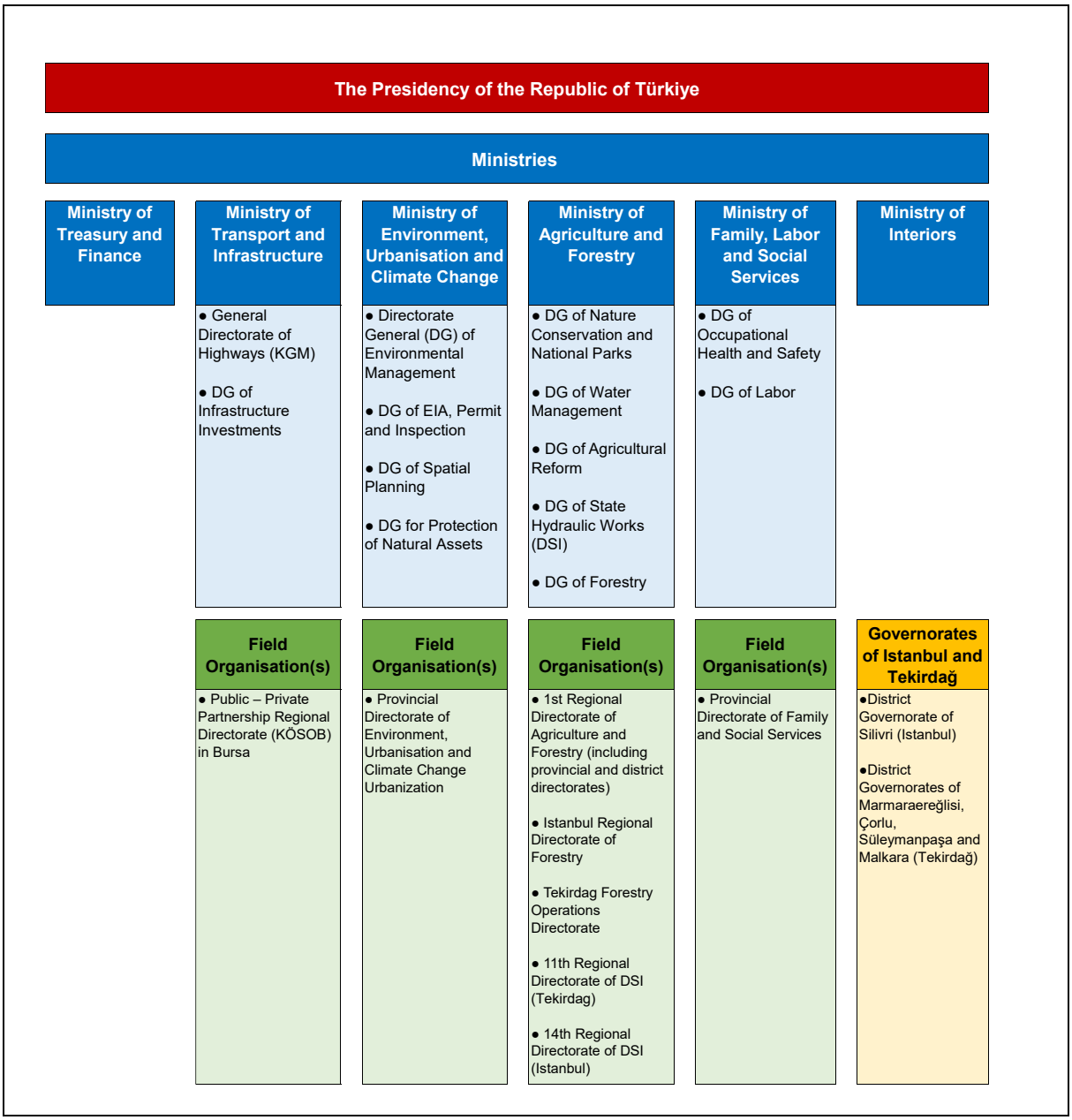


Figure 4-1. Institutional Framework relevant to the RAP – Central Administration

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

Türkiye is administratively divided into 81 provinces, based on geographical characteristics, economic conditions, and public service needs. Provinces ("*il*" or "*şehir*") are further divided into lower levels of administrative units namely, districts ("*ilçe*"), neighbourhoods ("*mahalle*") in metropolitan municipalities and villages ("*koy*") in non-metropolitan municipalities. There are also localities ("*bağlı*" or "*mezra*"), which are small settlement areas connected to villages.

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

İstanbul and **Tekirdağ** provinces **are governed by metropolitan municipalities**. Therefore, all settlements within the districts of **İstanbul** and **Tekirdağ** are classified as neighbourhoods; there are no villages or hamlets within the administrative boundaries of these cities. Under the jurisdiction of the İstanbul and Tekirdağ metropolitan municipalities, the following district municipalities are responsible for administering the neighbourhoods affected by the project-related land acquisition:

- **İstanbul: Silivri** District Municipality
- **Tekirdağ: Marmaraereğlisi, Çorlu, Süleymanpaşa** and **Malkara District** Municipalities

Contracting (Granting) Authority – KGM

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

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

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

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

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

KGM has a **Public – Private Partnership Regional Directorate** (**KÖSOB** – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*) headquartered in Bursa Province[59]. The Project falls within the responsibility area of the **KÖSOB**. The organisational structure, roles, and responsibilities of this Unit, particularly in relation to the implementation of the RAP, are detailed in Chapter 14 of this document.

Responsibilities of KGM under the Expropriation Law

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

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

[59] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx

4.2. National Legislation

4.2.1. Constitution of the Republic of Türkiye

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

> ***Article 46***[60]*–The State and public corporations shall be entitled, where the public benefit requires, to expropriate privately owned real estate wholly or in part and impose administrative servitude on it, in accordance with the principles and procedures prescribed by law, provided that the actual compensation is paid in advance.*
>
> *The compensation for expropriation and the amount regarding its increase rendered by a final judgment shall be paid in cash and in advance. However, the procedure to be applied for compensation for expropriated land for the purposes of carrying out agriculture reform, major energy and irrigation projects, and housing and resettlement schemes, afforestation, and protecting the coasts, and tourism shall be regulated by law. In the cases where the law may allow payment in instalments, the payment period shall not exceed five years, whence payments shall be made in equal instalments.*
>
> *Compensation for the land expropriated from the small farmer who cultivates his/her own land shall be paid in advance in all cases. An interest equivalent to the highest interest paid on public claims shall apply in the instalments envisaged in the second paragraph and expropriation costs not paid for any reason.*

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

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

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

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

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

Recognition of Rights (Eligibility under Law)

The Law explicitly recognises the rights of the following groups:

- Individuals or entities with formal legal rights to land (e.g., titled landowners or shareholders)
- Formal users of state-owned lands, such as those who pay occupancy fees ("*ecrimisil*") for using Treasury land or who have registered fixtures/structures ("*muhdesat*") on Treasury lands
- Individuals with customary or possession-based rights, referred to as possessors (*zilyet*).

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

Compensation for Possessors

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

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

Compensation for Crops

Regarding crops, Article 20 outlines:

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

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

According to Article 8 of the Expropriation Law, in expropriations to be carried out by the administrations under the Law regarding immovable properties registered in the land registry, it is essential to **primarily apply the procurement (purchase) procedure** through negotiated settlement.

In this Project, KGM – KÖSOB has prioritised **negotiated settlement** and purchase through the Article 8 process aiming to ensure that property transfer is done with the owners' consent, reduce legal disputes, and speed up the process.

Accordingly, KGM – KÖSOB considers filing lawsuits (Article 10 or Article 27 followed by Article 10 – noting that Article 27 has not been applied in the Project to date) for the following cases – in line with the construction schedule and depending on the current expropriation budget available for payment to right holders:

1. When the negotiations between the immovable property owners and the expropriation commission **do not result in an agreement**;

2. When the **owners or shareholders do not attend the negotiation meetings** despite receiving official invitations from KGM;

3. When the owners or shareholders attend the negotiation meetings but **refuse to sign agreement protocols**; or;

4. When the parties agree on the compensation amount, **but there are annotations or declarations on the title deed that prevent the transfer, or when inheritance procedures have not been finalised**, title registration cannot be completed under the negotiated settlement process defined in Article 8. As a result, such cases do not conclude with a formal agreement protocol.

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

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

In practice, such cases necessitate the application of the Article 10 or Article 27 (followed by Article 10) process by KGM in accordance with the Law and as a last resort, once all right holders have been invited to negotiation meetings under Article 8, and these negotiations with the participating landowners have been exhausted and ultimately failed.

Court-Based Determination of Expropriation Compensation and Registration (Article 10)

Article 10 regulates the judicial process for determining compensation and transferring ownership when negotiated settlement and purchase cannot be achieved through Article 8.

If the administration cannot purchase the property through negotiation (Article 8), it applies to the **civil court of first instance where the property is located** and requests:

- the **determination of the expropriation value by the court**, and
- the **registration of the property in the name of the administration** once the compensation is paid.

In this process, as required, the **court appoints expert valuers** who conduct a site inspection and prepare a valuation report. the judge determines a fair compensation amount based on the expert reports and statements of the parties. The administration must deposit the determined compensation in a bank account designated by the court. Once the payment is deposited, the court orders the registration of the property in the name of the administration and the payment of compensation to the rightful owner. The ownership transfer is final, but the parties may still appeal the amount of compensation. If the owner cannot be identified, the compensation is deposited in a bank account and kept until the rightful owner is determined.

Accelerated Expropriation (Article 27)

When an accelerated expropriation decision is issued in accordance with Article 27 of the Expropriation Law, the administration may first apply to the court under Article 27 to obtain accelerated possession of the property (land seizure). The regular expropriation procedure, including the determination of compensation and registration of the property, is then carried out under Article 10.

For the Project, a Presidential **Decree** (Decision Date: 12April 2023, No. 7060) 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[61] (No. 32162) on **13April 2023** (referred to as **Accelerated Expropriation Decision**).

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

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

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

The full text of Article 27 is provided in Appendix G . Figure 4-2 provides a flow chart summarising the expropriation process – through Article 8, Article 10 and Article 27 – implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983). The figure presents both the regular procedure (Article 8) and the court-led process (Article 10), as well as the steps involved in accelerated expropriation under Article 27, as the Project has in place an Accelerated Expropriation Decision issued by the President of Türkiye. The roles of the relevant institutions, key procedural steps, applicable legal deadlines, and decision-making authorities are illustrated,

[61] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

highlighting the sequence of actions required when there is disagreement over compensation value, and how accelerated land entry is enabled under Presidential decree.

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

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

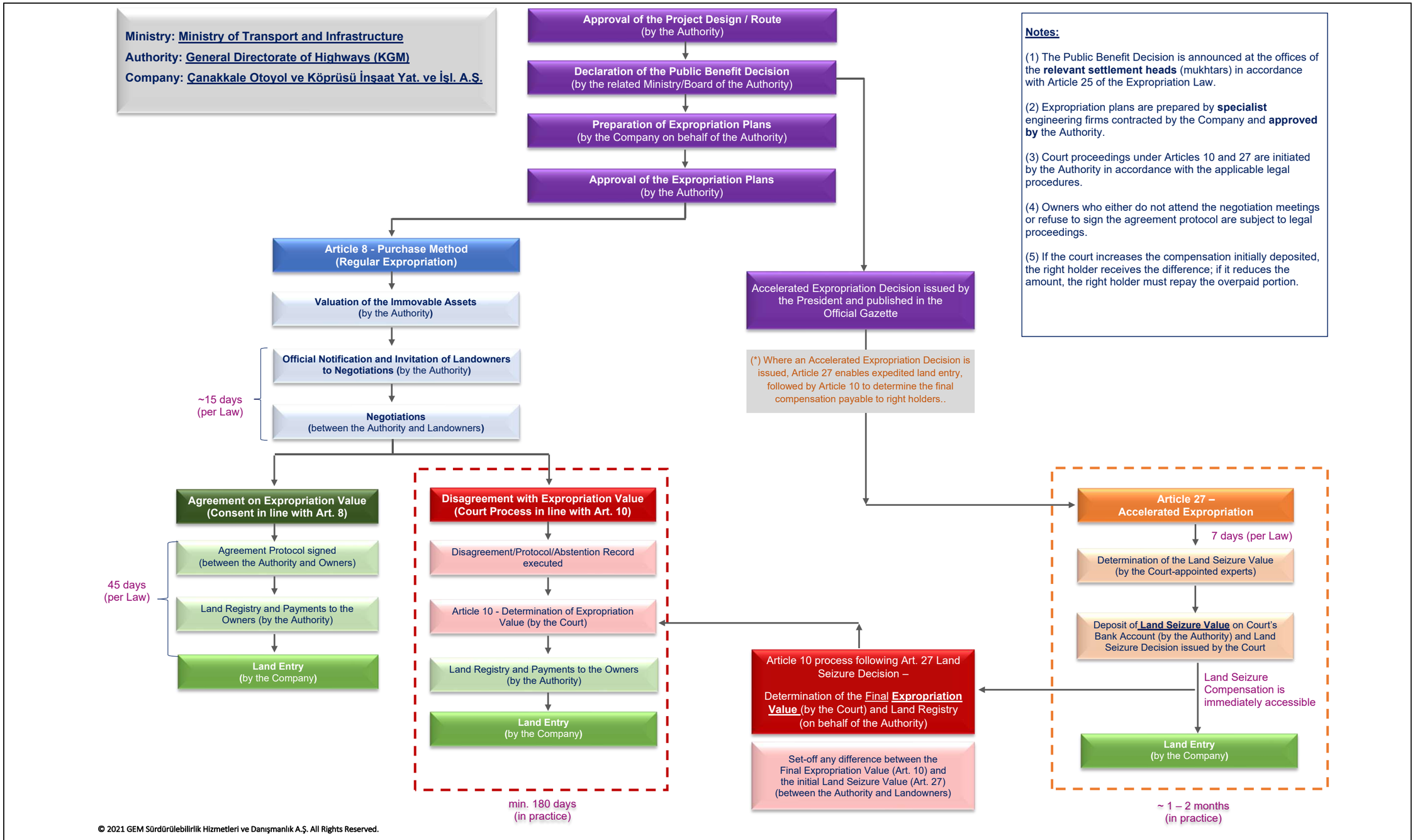


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Figure 4-2. Summary of the Expropriation Process implemented by KGM in accordance with Türkiye's Expropriation Law (No. 2942, 1983)

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

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

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

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

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

- Administrative Procedure Law (No. 2577, 1982)
- Agricultural Reform Law on Land Arrangement in Irrigated Areas (No. 3083, 1984)
- Cadastral Law (No. 3402, 1987)
- Code of Civil Procedure (No. 6100, 2011)
- Forest Law (No. 6831, 1956)
- Land Registry Law (No.2644, 1934)
- Law on Preventing Intrusion or Possession of Immovable Property (No 3091)
- Law on the Protection of Personal Data (Law No. 6698, 2016).
- Law on Soil Conservation and Land Use (No. 5403, 2005)
- Metropolitan Municipality Law (No. 5216, 2004)
- Notification Law (No. 7201, 1959)
- Pasture Law (No. 4342, 1998)
- Real Estate Tax Law (No. 1319, 1970)
- Turkish Civil Code (No. 4721, 2001)
- Zoning Law (No. 3194, 1985)

4.3. International Standards

The international standards applicable to the Project include the following:

- International Finance Corporation (IFC) Performance Standards (PSs) (2012)
- Equator Principles (EP) 4 (2020)
- The Organisation for Economic Co-operation and Development (OECD) Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (the "Common Approaches" adopted in 2012 and revised by the OECD Council in 2016 and 2024).

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

4.3.1. IFC Policy on E&S Sustainability

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

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

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

- IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023)
- Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector (prepared by Social Development Direct; supported by EBRD, CDC, IFC, 2020)
- IFC PS5 Guidance Note: Land Acquisition and Involuntary Resettlement (2012)
- Stakeholder Engagement Handbook: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)
- IFC' Good Practice Note on Addressing Grievances from Project-Affected Communities (2009)
- The Handbook for Preparing a Resettlement Action Plan of the IFC (2002)

4.3.2. Equator Principles 4 (2020)

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

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

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

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

4.3.3. OECD Common Approaches (2024)

The Project will be implemented in compliance with the Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence ("the Common Approaches"), which was adopted on 28 June 2012 and revised by the OECD Council in 2016 and 2024, which sets common approaches for undertaking E&S due diligence to identify, consider and address the potential E&S impacts and risks relating to applications for officially supported export credits as an integral part of Members' decision-making and risk management systems.

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

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

4.4. Gap Analysis between National Legislation and International Standards

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Avoidance and Minimisation of Displacement and Assessment of Alternatives	The client will consider feasible alternative project designs to avoid or minimize physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.	The Expropriation Law of Türkiye does not include specific provisions.	Although the Expropriation Law does not include explicit provisions regarding displacement, the expropriating authority (i.e. KGM) takes the displacement impacts of projects into account during site or route selection, to the extent feasible. KGM projects are planned and designed in line with established design criteria and technical specifications, which prioritize the minimisation of land use and expropriation to reduce expropriation costs and displacement impacts of the projects on people.	During the route selection process, **KGM has avoided and minimised land acquisition and expropriation to the extent feasible**, in order to reduce the socio-economic impacts of the Project and to minimise expropriation costs. Once appointed, the SPV implemented route modifications to optimise the design and minimise the Project's environmental and social risks, including land acquisition-related impacts. During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the mechanisms outlined in Section 2.8. Also, affected people will have the right to submit requests to KGM seeking the avoidance or minimisation of impacts on their assets (such as requesting acquisition of orphan lands, avoidance of their structures). These requests will be evaluated by KGM, in coordination with the SPV, based on technical and financial feasibility.
Avoidance of Forced Eviction	Forced evictions[62] will not be carried out except in accordance with law and the requirements of the performance standards.	The Expropriation Law – **Article 20** defines the procedure for the "Evacuation of the Immovable Asset". Evacuation of the immovable property registered in the name of the expropriating authority under this Law is requested by the authority from the enforcement officer. The enforcement officer notifies the occupants to vacate the property within fifteen days. If the immovable property is not vacated within this period, it will be vacated by enforcement. Objection or complaint does not suspend the evacuation, and the court cannot issue a preliminary injunction.	In expropriations carried out under Article 8 or Article 10 processes, eviction is carried out in accordance with Article 20 of the Expropriation Law after the immovable property is registered in the name of the expropriating authority. The advance notice period is limited to the timeframe specified under Article 20 of the Law. In expropriations carried out under Article 27 process, the immovable property is also evicted pursuant to Article 20 following the court's Land Seizure Decision.	**The Project will avoid forced eviction.** The principles guiding this commitment are outlined in Section 6.4– under "Avoidance of Forced Eviction and Procedure for Lawful Evictions". Evacuation of expropriated buildings and assets will be carried out in accordance with the Expropriation Law and the requirements of international lenders. To prevent forced eviction and allow adequate time for resettlement planning and preparation, the SPV will notify the owners and users (formal and informal) of affected structures **six months prior to land entry**– taking into account KGM's expropriation schedule. Where the required notice period cannot be met, the SPV will implement alternative measures agreed with the affected people to ensure that forced eviction is avoided.

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

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
				If eviction becomes unavoidable, the KGM and the SPV will comply with the requirements of national legislation and the provisions of relevant international standards (such as IFC PS5). Eviction will be carried out in a manner consistent with the fundamental principles of due process, including: provision of adequate advance notice; meaningful opportunities to submit grievances and appeals; avoidance of unnecessary, disproportionate, or excessive use of force; prevention of homelessness; and ensuring that adequate compensation is provided prior to the eviction. The SPV will notify the Lenders prior to carrying out any eviction. This notification will include a confirmation that all applicable conditions, as outlined above, have been and are being fulfilled.
Negotiated Settlements	To help avoid expropriation and eliminate the need to use governmental authority to enforce relocation, clients are encouraged to use negotiated settlements meeting the requirements of the performance standards, even if they have the legal means to acquire land without the seller's consent.	The Expropriation Law – **Article 8** ("Purchase Method") stipulates prioritisation of the negotiated purchase method.	There is no gap as per the Law. The purchase method based on negotiation is prioritised by Law. In practice, KGM opts for negotiated settlements with the owners/shareholders to avoid court procedures (in line with the Expropriation Law) that may decelerate the progress of Project implementation and lead to additional costs associated with legal proceedings.	In this Project, KGM has **prioritised negotiated settlements** through the Article 8 process under the Expropriation Law (purchase method).
Failure of Negotiation – lega proceedings	In cases where affected persons reject compensation offers that meet the requirements of the performance standards and, as a result, expropriation or other legal procedures are initiated, the client will explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring.	The Expropriation Law – **Article 10** ("Determination of Expropriation Value and Registration of Immovable Property in the Name of the Administration by the Court") stipulates that if expropriation cannot be carried out through purchase, the administration shall apply to the civil court of first instance in the jurisdiction where the immovable property is located, and request a ruling for (i) the determination of the expropriation value of the immovable property, and (ii) its registration in the name of the administration. If an Accelerated Expropriation Decision is issued for the projects, they may proceed under Article 27. The Expropriation Law – **Article 27**("Accelerated Expropriation")	In cases where negotiations fail, the expropriation value is determined by the court. The court processes Article 10 can involve lengthy procedures. Information and engagement with affected people may be inadequate, and issues or difficulties related to the deposition and withdrawal of compensation by affected people may pose disadvantages for the affected people.	**KGM will initiate court proceedings only if negotiations under Article 8 fail.** KGM and the SPV will take various measures to ensure that court proceedings do not negatively impact the affected people. These measures – including the timely provision of information to affected people at all stages of the legal process and providing assistance to affected people to conclude inheritance and succession procedures – are aimed at mitigating potential adverse impacts. A detailed description of these actions is provided in Section 14.5 under "Coordination between KGM and SPV in case of Court Proceedings".

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		stipulates that a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the **procedures other than valuation** shall be completed afterwards. The Project has in place Accelerated Expropriation Decision (Presidential Decree Date: 12 April 2023, No. 7060).		
Consideration of Vulnerable Groups	Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, and as part of the process of identifying risks and impacts, the client will identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status[63]. Where individuals or groups are identified as disadvantaged or vulnerable, the client will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities. Particular attention will be paid to the needs of the poor and the vulnerable	According to the **Constitution of the Republic of Türkiye**, measures to be taken for children, the elderly, disabled people, widows and orphans of martyrs as well as for the invalid and veterans shall not be considered as violation of the principle of equality; the State shall protect the widows and orphans of martyrs of war and duty, together with invalid and war veterans, and ensure that they enjoy a decent standard of living; the State shall take measures to protect the disabled and secure their integration into community life; the aged shall be protected by the State; state assistance to, and other rights and benefits of the aged shall be regulated by law; to achieve these aims the State shall establish the necessary organizations or facilities, or arrange for their establishment." The Expropriation Law of Türkiye does not include specific provisions.	As there are no specific legal provisions, individuals and groups who may be directly and disproportionately affected by project-related land acquisition due to their disadvantaged or vulnerable status are not specifically identified as part of the land acquisition process, and differentiated measures are not specifically or systematically developed.	The SPV has prepared this RAPin accordance with international standards. The RAP identifies **vulnerability categories and vulnerable people affected by land acquisition activities** within the RAP survey sample. It also defines specific entitlements and support mechanisms tailored to the needs of vulnerable PAPs. Targeted consultations have been carried out in accordance with the principles of this RAP to ensure the concerns of vulnerable groups were adequately addressed. A **RAP Disclosure and Engagement Action Plan** for disclosure and implementation phases will be developed as part of the RAP. This will include **specific consultation approaches and communication tools designed to engage affected vulnerable people** effectively (see Section 10.3).
Consideration of Gender Aspects	The consultation process should ensure that women's perspectives are obtained, and their interests factored into all aspects of resettlement planning and implementation. Addressing livelihood impacts may require intra-household analysis in cases where women's and men's livelihoods are affected differently. Women's and men's preferences in terms	According to the **Constitution of the Republic of Türkiye**, men and women have equal rights, including the right to own and inherit property. In practice, women in Türkiye do own and inherit land. The Expropriation Law does not contain specific provisions for women, as its implementation is intended to apply equally to all rightsholders,	As there are no specific legal provisions, the differential gender impacts of physical or economic displacement are not explicitly considered, and tailored measures are not specifically or systematically developed.	RAP field surveys have ensured targeted surveys with **women owners, shareholders and land users** to enhance the representation of women in the socio-economic baseline – noting that the number of women land users in this region is relatively low. A RAP Disclosure and Engagement Action Plan for disclosure and implementation phases will be developed as part of the RAP. This will include

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

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
	of compensation mechanisms, such as compensation in kind rather than in cash, should be explored. Documentation of ownership or occupancy and compensation arrangements should be issued in the names of both spouses or heads of households, and other resettlement assistance, such as skills training, access to credit, and job opportunities, should be equally available to women and adapted to their needs.	regardless of gender. Through Article 8, both female and male owners/shareholders are invited to and can participate in the negotiations and payments are made to each party in accordance with the outcomes of these negotiations.		**particular consultation and information tools for women** (see Section 10.3).
Census and Inventory of Assets	Where involuntary resettlement is unavoidable, either as a result of a negotiated settlement or expropriation, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	The Expropriation Law – **Article 7** ("Procedures to be Completed Prior to Expropriation") defines the procedures required to be followed for the inventory of assets (land, crops, trees, structures), identification of the immovable assets and their legal owners/shareholders and possessors ("*zilyet*"). This data serves as the basis for the valuation study conducted by KGM, through its appointed engineering firms (valuation contractors), in accordance with the Expropriation Law. The Expropriation Law of Türkiye recognises "*zilyet*" (**possessor**) rights where there is no title deed (in the absence of cadastral surveys). In the area where the Motorway route passes, the cadastral works along the expropriation corridor have been completed by General Directorate of Land Registry and Cadastre (TKGM) and there are no parcels without title deed registration; hence, **no possessory ("*zilyet*") rights exist in this Project.**	The census and inventory of assets conducted in accordance with the Expropriation Law is limited with the legal owners/shareholders of the affected assets and the national Law does not require collection of data on informal users of lands. On the other hand, KGM has in place Technical Specifications for the Services to be Procured for the Valuation of Immovables (KGM, February 2019). This requires collection of data from the owners and/or users of the parcels. The data collected is integrated to the valuation of assets. However, this data is not used for further social and/or economic monitoring of the PAPs. The assets inventory in line with the Expropriation Law is being done for the full alignment covering all parcels affected by the Project within the expropriation corridor, structures built and/or used or agricultural practices done by formal and informal persons on affected parcels, including state-owned parcel (e.g. treasury parcels). On the other hand, expropriation plans include only the names of people with formal legal rights (asset owners). Article 19 of the Expropriation Law stipulates that "*For the expropriation of the land with a title deed belonging to others, unclaimed lands and/or lands that have not been acquired by*	The census and asset inventory were carried out for the full alignment (Section 1, 2 and 3) by an engineering firm (valuation contractors) appointed by the Project in accordance with the Expropriation Law and KGM's Technical Specifications. Through the sample-based RAP field surveys conducted as part of RAP, categories of affected people – including owners, tenants, and formal/informal users – have been identified and the necessary socio-economic data for the development of the RAP has been collected. **Informal and formal land users**– including household members with vulnerabilities – who were not included in the expropriation plans approved by KGM, were identified as part of RAP field surveys in November 2025 (Section 3) and March 2026 (Section 1 and Section 2 – KM 58-60). Based on the RAP baseline surveys, the SPV has started development of a **PAP Database** for Land Acquisition in parallel with the RAP process. As part of the **RAP implementation process**, the surveys will be extended to cover all project-affected households, including formal and informal land users. The data collected will be incorporated into the PAP Database by the Project RAP Implementation Team.

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
			the possessor, the minimum material cost of the buildings and the value of the trees as determined in accordance with Article 11 shall be paid to the possessor ("zilyet")". Article 19 of the Expropriation Law stipulates valuation and compensation of owners of the informal building/structures and trees on state-owned lands (e.g. treasury parcels) based on the minimum prices. Noting that "*zilyet*" rights, which are recognised under Expropriation Law of Türkiye, are not applicable to the parcels affected by the Project as the cadastral surveys have been completed for all parcels affected by the project.	
Eligibility Classification	Displaced persons may be classified as persons; (i)who have formal legal rights to the land or assets they occupy or use; (ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognizable under national law[64]; or (iii)who have no recognisable legal right or claim to the land or assets they occupy or use. The census will establish the status of the displaced persons.	The Expropriation Law recognises the legal owners and shareholders of affected assets, as well as formal users of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – *ecrimisil*), as eligible for compensation. Regarding the **compensation of informal users,** the Expropriation Law – **Article 19** ("Registration of immovable properties not recorded in the land registry and the rights of the possessor") stipulates that in the expropriation of properties that are registered under someone else's name, ownerless, and/or not acquired by the **possessor**, the **minimum material cost** of buildings and the value of trees as appraised under Article 11 are paid to the possessor. This does not include informal users of forest and pasture parcels. Please refer to "Census and Inventory of Assets" row, regarding the **possessor**("***zilyet***") **rights** recognised under Expropriation Law.	The census and asset inventory by KGM identifies all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation. i) People who have formal legal rights to the land or assets they occupy or use are eligible for compensation under Expropriation Law. This includes formal users of state-owned lands, who may receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself. ii) People who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law, such as informal users of treasury who pay adequate pay ("*ecrimisil*") for their informal occupation, are compensated for their structures – based on minimum material cost ("***asgari levazım bedeli***") – and trees under Expropriation Law – **Article 19. However, no compensation is provided for the land** itself.	This RAP sets out the key compensation and assistance principles in accordance with IFC PS5 and includes an Entitlements Matrix detailing the entitlements for all **eligible categories** defined under these standards, including owners, shareholders, and both formal and informal users of the affected lands and assets.

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

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
			iii) People who have no recognisable legal right or claim to the land or assets they occupy or use–such as informal users of forest and pasture lands are considered as **illegal occupants ("*işgalci*")**, are not entitled to any form of legal compensation for either the land or the assets.	
Cut-off Date	In the absence of host government procedures, the client will establish a **cut-off date for eligibilit**y. Information regarding the cut-off date will be well documented and disseminated throughout the project area.	The Expropriation Law – **Article 25** defines the "Restriction of Rights and Transfer of Ownership to the Administration". As per the Law, in large-scale public projects extending over future years, such as dams, irrigation networks and pipelines, highways, railways, ports, and airports, the public interest decision shall be announced by posting it for fifteen days in the neighbourhood and/or village headman's office where the immovable properties to be expropriated are located. From the end date of the public interest announcement period, the value of fixed facilities built and trees planted on the immovable properties to be expropriated shall not be taken into account in the determination of the expropriation value. The restriction on the immovable properties shall be valid for five years from the end date of the announcement. The legal owners are officially notified during Article 8 process. In cases where the procedure under Article 27 is applied, the accelerated expropriation decision is published in the Official Gazette.	The practices and announcements done in line with Article 8, Article 25 and Article 27 of the Expropriation Law broadly covers the cut-off date requirements of the international standards. On the other hand, additional communication efforts may be required to ensure full compliance with IFC PS5 requirements on the disclosure of information related to the cut-off date. Even though the Law does not have explicit requirements regarding information of informal users on cut-off date, the formal users of the state-owned parcels (using the land with adequate pay – *ecrimisil*) are required by the Valuation Commission to provide the adequate pay (*ecrimisil*) documentation and compensated for the standing crops. Through this process, informal/formal users are also identified (personally or through mukhtars), and they are verbally informed about the upcoming expropriation and construction processes such that the lands used informally must not be cultivated further, the standing crops must be removed and the land must be evacuated. The period between the cut-off date and compensation of the affected land is essentially limited in BOT projects thus no relevant gap is foreseen in the Project.	The cut-off dates are determined based on the completion date of the census and asset inventory surveys conducted in each respective settlement and specific to each affected settlement. The cut-off date provisions will apply to both the owners and shareholders of the lands and assets, as well as to their formal and informal users. The cutoff will be specific to each affected settlement. The Project broadly communicates the cut-off date in each affected settlement (except Section 3, where expropriation process had commenced before the preparation of the RPF and RAP), to ensure that all affected persons, and any person seeking to settle in the area, are informed. Accordingly, following completion of inventory of assets by the valuation contractor and KGM's approval of the expropriation plans, the KGM – KÖSOB, with support from the SPV, has started posting the list of affected parcels along with a notice disclosing the applicable cut-off date and its conditions, prior to Article 8 negotiation meetings in each settlement (please note that Article 8 negotiation meetings were completed in Section 3 prior to the commencement of the RPF process). These lists and notices reposted in the offices of the mukhtars. within the respective affected settlements. In Section 3, as the expropriation process had commenced before the preparation of the RPF and RAP, the SPV will post cut-off date announcements, in alignment with the construction schedule and priorities (starting from August 2026), to inform affected people that crops cultivated on parcels after the completion of expropriation under Article 8 or Article 10 will not be eligible for additional compensation (i.e. crop payment), as these parcels have been formally allocated to the Project (see Section 2.6.5).

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Valuation, Compensation and Benefits for Displaced Persons	When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at **full replacement cost** and other assistance to help them improve or restore their standards of living or livelihoods, as provided in this Performance Standard. Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of displaced persons are land-based[65], or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available[66] and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation[67].The client will also provide opportunities to displaced communities and persons to derive appropriate development benefits from the project.	Valuation Methodology: Expropriation Law – **Article 11** **"**Principles for Determining Expropriation Compensation**"** defines the principles and methodologies for valuation of lands, urban plots ("*arsa*"), and buildings based on a set of defined criteria. The valuation methodology adopted by KGM is outlined in the *Technical Specifications for the Engineering Services to be Procured for the Valuation of Immovables* (KGM, February 2019) Valuation of Agricultural lands: The valuation is based on the capitalisation of annual net income, calculated with reference to market prices. Valuation of Structures: The valuation is based on the Approximate Unit Structure Costs published annually by the Ministry of Environment, Urbanization and Climate Change. Depreciation rates are applied based on the age and condition of each structure. Valuation of Trees: The valuation is based on KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": "*The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the*	Valuation Methodology: The expropriation values are determined in accordance with the well-established procedures set out in the Expropriation Law and are consistent with KGM's Technical Specifications. Delivery of Compensation: Expropriation Law – Article 26 of the Expropriation Law recognises the land-for-land approach; however, the applicability of this option in Türkiye is very limited and not feasible for this Project located in İstanbul and Tekirdağ. In case of Article 27, land seizure occurs only after an official invitation has been issued, and the determined compensation amount is deposited into the bank specified in the announcement. The amount deposited is immediately accessible to the rightful owners. Subsequently, the expropriation value of the asset is re-evaluated by the court under the Article 10 process. Any difference between the initial land seizure value and the final court-determined expropriation value is settled between the authority and the owners upon conclusion of the court proceedings. Full Replacement Cost: The Law does not require compensation at full replacement cost, nor does it mandate the provision of additional assistance to restore or improve the living standards and livelihoods of affected people. Buildings and structures (residential, commercial or non-residential), are not compensated at full replacement cost, as depreciation is deducted based on the age	This RAP includes an Entitlements Matrix, which provides for compensation at full replacement cost, along with additional assistance and support measures, for each category of affected people (owners and formal and informal users of affected lands, affected houses, and affected businesses, if any). **The SPV will provide additional compensation to the affected people from the RAP Fund** to supplement the amounts paid by KGM under Turkish Expropriation Law. This top-up payment will ensure that the total compensation received by PAPs reflects the **full replacement cost**, in line with international standards. In addition, the RAP Fund will finance the delivery of livelihood restoration, improvement, and assistance measures outlined in this RAP. Both (i) those who reach an agreement with KGM on the expropriation value in accordance with Article 8 of the Expropriation Law, and (ii) those who do not reach an agreement and whose assets are acquired through a court process under Article 10 or Article 27(followed by Article 10), will be eligible for compensation and support under the RAP, through the RAP Fund established by the SPV. These entitlements will be provided in addition to the cash compensation paid by KGM in accordance with the Expropriation Law. **The RAP Fund will be allocated and managed by the SPV,** as detailed in Chapter 16.

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

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

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

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports". For trees in the preparation and maintenance period (i.e. before entering the productive stage), compensation is determined using the capitalisation method. This includes costs associated with labour, machinery, and materials for cultivation, planting, irrigation, fertilization, pesticide application, and other relevant agricultural inputs, along with the rental value of the land. Valuation of Crops: In the case of cultivated land, evacuation is postponed until after harvest. If waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court. If the crop value has already been taken into account in determining the expropriation value pursuant to Articles 11 and 12, it is not necessary to determine and pay this amount again for the evacuation of the immovable property. Delivery of Compensation: Mandatory cash compensation, as stipulated by the Expropriation Law, is provided by the responsible authority in accordance with the procedures specified therein. According to Article 8 of the Expropriation Law ("Purchase Method"), the administration is required to prepare the amount specified in the Purchase Agreement Protocol ("*Satın Alma Tutanağı*") within forty-five days and request the property owner to transfer ownership rights to the administration on	and condition of each structure. In accordance with the depreciation ratios set out in the relevant Turkish legislation. Transaction costs – such as taxes, stamp duties, legal and registration fees, and relocation cost – are typically not separately included in the valuation. However, the valuation study for the Project is recent. The valuation of agricultural land has been carried out using a capitalisation approach based on annual net income, taking current market prices into account. Compensation of Formal Users: formal users of state-owned lands receive compensation for any structures, trees, and standing crops they have on the land – though not for the land itself. Please refer to "Eligibility" row. Compensation of Informal Users: informal users of treasury who pay adequate pay ("*ecrimisil*") for their informal occupation, are compensated for their structures – based on **minimum material cost** ("***asgari levazım bedeli***") – and trees under Expropriation Law – **Article 19. However, no compensation or assistance (To find replacement land) is provided for the land lost.** Informal users of forest and pasture lands are considered **illegal occupants ("*işgalci*") and** are not entitled to any form of legal compensation or assistance (to find replacement land) for either the land or the assets. Please refer to "Eligibility" row. Compensation for Crops: There is no legal gap. In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is required by the SPV/EPC Contractor before the harvesting season concludes, KGM mandates that the SPV/EPC Contractor accessing the land	

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
		the date specified in the title deed. The expropriation fee is paid immediately upon the realisation of the rights transfer. Consequently, land entry occurs after the compensation has been deposited into the owners' account. Livelihood Restoration and Assistance: The Expropriation Law of Türkiye does not include specific provisions.	provide compensation for the crops, in accordance with the Expropriation Law. Livelihood Restoration and Assistance: The Expropriation Law does not provide for livelihood restoration, assistance, or transitional support for formal or informal owners/users, except in cases of government-led resettlement. Loss of pastures or restrictions on access to resources are not compensated, and no assistance measures are provided to the affected people.	
Community Engagement	The client will engage with Affected Communities, including host communities, through the process of stakeholder engagement described in relevant performance standards. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of the relevant international standards.	The Expropriation Law requires the disclosure of information and official notification to affected owners and shareholders in accordance with regulatory procedures. Expropriation Law – **Article 8** ('Purchase Method') stipulates that owners must be notified by an official registered letter of the authority's intention to acquire, through negotiation, the immovable property, resource, or any easement rights thereon. Consultations are conducted as part of the negotiation meetings, which are held on the date determined by the commission, provided that the owner or their authorized representative is in attendance. The Article 27 Accelerated Expropriation Decision issued for the Project (Decision No. 7060, dated 12 April 2023) was disclosed to the public through publication in the Official Gazette on 13 April 2023. (https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf)	The information disclosure and official notification process, as defined by the Law, is limited to landowners and shareholders. There are no specific provisions or measures in place to address the needs of land users, vulnerable groups, or gender-related aspects in the design or implementation of information disclosure and consultation processes.	As part of the ESIA package, the SPV has developed and will implement a SEP in line with international standards. The RAP also includes a detailed A **RAP Disclosure and Engagement Action Plan** for disclosure and implementation phases. This Plan will be implemented in alignment with the Project SEP. A **Guide to Land Acquisition and Compensation (GLAC) has been** prepared in both English and Turkish in Q2 2026. The GLAC provides a concise, clear, and non-technical summary of the RAP. Following its approval by the Lenders, the GLAC was disclosed[68] on the Project's website in Turkish and in English. Hard-copies of the GLAC will be distributed to and presented to affected people (anticipated to commence in Q3 2026). Please refer to Chapter 10 for specific provisions regarding engagement and information-sharing strategies, including tailored measures for vulnerable individuals. Please refer to Chapter 14 for information on the organisational capacity established for the Project and the roles responsible for community engagement and information disclosure.

[68] Turkish: 1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-edinimi-ve-tazminat-kilavuzu-aetk.pdf; English: 1915canakkale.com/cmsfiles/Galleries/18348/cok-guide-to-land-acquisition-and-compensation-glac.pdf

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to for specific Articles in Law)	Gaps	Actions to Bridge the Gaps
Grievance Mechanism	The client will establish a grievance mechanism consistent with relevant international standards as early as possible in the project development phase.	The Expropriation Law grants affected owners the right to object to the expropriation value. According to **Article8**, if no agreement is reached or the deed of transfer is not provided during the negotiation meetings, proceedings shall be initiated in accordance with Article 10 of the Law. Formal Correspondence: KGM collects land acquisition-related grievances and feedback from affected persons through official letters and petitions and responds to them via formal correspondence. KGM website: KGM also provides a **grievance form**[69] on its official website, which can be used by the public to submit concerns or feedback related to expropriation matters. The Presidency's Communication Centre (CIMER): CIMER provides a centralized complaint mechanism for the public.	The Expropriation Law and national legislation do not require the establishment of a project-specific grievance mechanism that meets the standards set by the international standards.	The SPV has developed, and will implement, a SEP, including a Project-specific grievance mechanism, in line with international standards. Please refer to Chapter 11 for the details of the grievance mechanism.
Physical and Economic Displacement[70]	In the case of physical displacement, the client will develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of the relevant international standards regardless of the number of people affected. In the case of projects involving economic displacement only, the client will develop a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of the relevant	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a Resettlement Action Plan or Livelihood Restoration Plan, as mandated by relevant international standards.	The SPV has prepared this RAP in accordance with international standards, **addressing both the physical and economic displacement impacts** of the Project. The compensation and assistance to be provided by the SPV to physically and/or economically displaced households through the **SPV's RAP Fund** will be in addition to the expropriation compensation provided by KGM.

[69] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Root/SikayetGeriBildirim.aspx

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

Topic/Issue	Key Requirements of the International Standards (IFC PS5)	National Legislation and Institutional Practices (please refer to Articles in Law) for specific	Gaps	Actions to Bridge the Gaps
	international standards. Where a project results in both physical and economic displacement, the relevant requirements should be incorporated into the Resettlement Action Plan or Framework (i.e., there is **no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan**).			
Monitoring and Evaluation	The client will establish procedures to monitor and evaluate the implementation of a Resettlement Action Plan or Livelihood Restoration Plan and take corrective action as necessary. The extent of monitoring activities will be commensurate with the project's risks and impacts. For projects with significant involuntary resettlement risks, the client will retain competent resettlement professionals to provide advice on compliance with the relevant international standards and to verify the client's monitoring information. Affected persons will be consulted during the monitoring process.	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require the preparation of a Resettlement Action Plan or Livelihood Restoration Plan, including monitoring and evaluation provisions, as mandated by relevant international standards.	The SPV has prepared this RAP in accordance with international standards, including the monitoring and evaluation provisions. Please refer to Chapter 13 for the details of the internal and external RAP monitoring mechanisms, as well as the resettlement completion audit.
Resettlement Completion Audit	Implementation of a Resettlement Action Plan or Livelihood Restoration Plan will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with the relevant plan as well as the objectives of the relevant international standards. The completion audit should be undertaken once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods. The completion audit will be undertaken by competent resettlement professionals once the agreed monitoring period is concluded.	The Expropriation Law of Türkiye does not include specific provisions.	The Expropriation Law and national legislation do not require a Resettlement Completion Audit in the context of project implementation.	As per this RAP, a **resettlement completion audit** will be conducted by qualified professionals once all mitigation measures have been substantially implemented, and the agreed RAP monitoring period has concluded.

5. Baseline Studies

5.1. Methodology of Baseline Surveys

For the baseline studies, a combination of qualitative and quantitative methods has been used, and the primary and secondary data have been evaluated together in the RAP.

5.1.1. Desk-based Review

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

- **Expropriation data provided by KGM – KÖSOB** (between November 2025 and April 2026):
  - Public benefit decision (*kamu yararı kararı*) and accelerated expropriation decision (*acele kamulaştırma kararı*) issued for the Project
  - Final expropriation corridor
  - Expropriation plans and lists (*kamulaştırma planı*) for the Motorway's expropriation corridor
  - Structure valuation forms
  - Sample valuation reports for various types of affected parcels
  - List of affected trees within the Motorway's expropriation corridor
  - Sample Article 8 notification letters issued by KGM to affected landowners and shareholders
  - Sample Article 10 court-appointed expert reports
  - Organisation structure and capacity of KÖSOB
  - Trackers on the status of expropriation (including agreement cases, ongoing Article 10 court cases)
  - Correspondence between KGM and other institutions regarding the displacement works
- Temporary construction site locations, land acquisition and permitting data
- Documentation detailing the status of expropriation for each affected parcel (including information on any ongoing court cases, where applicable)
- Relevant sections of the BOT contract outlining responsibilities related to expropriation (noting that KGM is the authorized administration responsible for land expropriation in accordance with the Turkish Expropriation Law – Law No. 2942, 1983)
- Preliminary Project Route and Final Alignment Comparison Document design change and resettlement avoidance measures implemented by KGM – KÖSOB and the SPV
- Report on identification of users of affected lands and structures, including contact details of affected people
- Corporate E&S policy, plans and procedures on stakeholder engagement and grievance mechanism (internal and external), gender equality and gender-based violence and harassment (GBVH)
- Relevant chapters of the ESIA and SEP – particularly those concerning Project description, analysis of alternatives, socio-economic baseline, vulnerable groups and individuals, E&S management system and stakeholder engagement (incl. grievance mechanism for public) (ESIA, March 2025).

5.1.2. Baseline Field Surveys

The components of baseline field surveys are summarised in Table 5-1.The methodology of the RAP field surveys is based on the following main principles:

- **Key-informant interviews** in all settlements with the exception of settlements with marginal impacts (a few parcels) were included in the survey sample.
- **User (formal and informal) identification surveys covering the full alignment**, in phases
- **Full census of affected residential, business (if any) and special-use structures**
- **Random sampling** for affected private and public lands and household-level livelihood interviews with their formal and informal users (sample size has been calculated for 95% confidence level and 5% margin of error)

Table 5-1. Baseline Field Survey Components

Phase	Scope	Status of RAP Field Surveys		
		Section 1 (KM 0 – 35)	**Section 2** (KM 35 – 70)	**Section 3** (KM 70 – 105)
Component 1 – Key informant interviews and user identification surveys	**Key-informant interviews** are conducted with the heads of affected settlements (mukhtars). This includes **land user identification** (formal and informal) in affected settlements.	**Completed** (in November 2025)	**Completed** for KM 58 – 60 (in March 2026) **To be completed for the full Section 2 –** following the approval of the expropriation plans by the cadastral office	**Completed** (in November 2025)
Component 2 – Resettlement Scoping Field Survey	Rapid interviews with sample **physically displacement households** (incl. households with vulnerable individuals) Rapid interviews with sample **economically displacement households** (formal and informal users of affected lands)	**Completed** (in December 2025)	**Completed** (in December 2025)	**Completed** (in December 2025)
Component 3 – RAP Field Surveys – Household-level	**Household-level physical displacement questionnaires** (with the owners and/or users of affected houses and structures) **Household-level livelihoods questionnaires** (with the owners and/or users of affected lands – including vulnerable individuals, women, and other local people whose livelihoods are affected by the Project) **Business interviews** (with the owners and/or users (tenants or informal users) of affected business structures) **Focus group discussions** with the affected women and local livestock breeders in selected settlements	**Completed** (in March 2026)	**Completed** for KM 58 – 60 (in March 2026) **To be completed for the full Section 2 –** following the approval of the expropriation plans by the cadastral office	**Completed** (in March 2026)

5.1.2.1. Component 1: Key Informant Interviews and Land User Identification Surveys

Key-informant interviews were conducted in all settlements (neighbourhoods) in Section 1, Section 2 (KM 58 – 60) and Section 3 with the exception of settlements with marginal impacts (a few parcels) were included in the survey sample.

- Section 1 (KM 0 – 35): **16 of 16** affected settlements in this section – surveyed in **November 2025.**
- Section 2 (KM 35 – 70): **3 of 12** affected settlements in this section, corresponding to the main construction camp site and priority construction areas (KM 58 – 60); surveys with the remainder of the settlements in this section will be planned following the approval of the expropriation plans by the relevant cadastral offices.
- Section 3 (KM 70 – 105): **10**[71] **of 11** affected settlements in this section– surveyed in **November 2025.**

The land user identification surveys for Section 1 and Section 3 were completed in November 2025 and for Section 2 – KM 58 – 60 in March 2026. Surveys will be planned for the remainder of Section 2 upon approval of the expropriation plans by the cadastral office and preparation of the structure valuation forms with the approval of KGM – KÖSOB.

Details of the surveys and their findings are presented in Section 3.2.2.

5.1.2.2. Component 2: Resettlement-Scoping Field Visit

A **resettlement-scoping field visit** was conducted by the key experts of the RAP Consultant Team (see Table 5-2) on **1 – 3 December 2025** (for three full days). The purpose of the exercise was to assist in identifying the key social impacts and risks associated with land acquisition and physical and/or economic displacement, to establish the compensation strategy, and to inform the detailed resettlement planning process.

Table 5-2. Resettlement-Scoping Field Visit Team

Role	Party
Project Manager, Senior E&S Consultant	GEM
Project Assistant Manager, Environmental, Health and Safety Consultant	GEM
Senior Expropriation and Valuation Expert, Agricultural Economist, Certified Real Estate Valuation Expert	Third-party – Academician
Agricultural Engineer, Senior Livelihood Restoration Consultant and Field Survey Coordinator	Third-party
Expropriation Manager	EPC

During the resettlement scoping field visit, the team engaged with the relevant public authorities including the District Directorates of Agriculture and Forestry in Silivri, Çorlu and Malkara, neighbourhood heads (mukhtars), as well as the owners and users (formal or informal) of affected lands and structures, including residential buildings, agricultural storage facilities, a pet animal shelter, and a pet burial ground, located on private, treasury, and public lands.

Given that the majority of parcels to be expropriated within the Project area consist of agricultural land, during the visits to the District Directorates of Agriculture and Forestry in Silivri, Çorlu, and Malkara, information was exchanged on topics including the general agricultural structure of the region, agricultural production along the Motorway corridor, land ownership and usage patterns, tenancy practices, key and alternative crops and livestock, agricultural subsidies, and marketing channels for agricultural products.

Mukhtars of selected neighbourhoods located along the alignment were also consulted as key informants. These consultations aimed to obtain preliminary information on the socio-economic characteristics of the settlements, local land use patterns, tenancy practices, and the potential presence of vulnerable groups among individuals who may be affected by the Project. In several settlements, mukhtars also assisted in identifying the likely users of

[71] Mukhtar of Nusratlı neighbourhood in Süleymanpaşa district declined to participate despite being fully informed by the survey team of the purpose of the survey.

specific parcels and provided contextual information regarding agricultural production, local infrastructure, and previous experiences with land acquisition processes.

In addition, a meeting was held with KGM – KÖSOB in Bursa province to obtain information on the status of ongoing expropriation activities along the Kınalı – Malkara section, including valuation methodologies, Article 8 negotiation timelines, and treatment of land users, among others. The RAP Consultant also presented to KÖSOB on the scope and objectives of the RPF and RAP, the requirements of the applicable international standards – particularly IFC PS5 – the gaps between national legislation and international standards, key compensation and assistance principles committed by the SPV within the RPF and RAP, the actions to be taken by the SPV to bridge those gaps and ensure full compliance with international standards and lender requirements, including but not limited to achieving full replacement cost in the compensation of affected assets, as well as the RAP Fund to be provided by the SPV for this purpose.

In selecting project-affected persons (PAPs) for engagement and affected parcels to be visited, special consideration was given to the following groups:

- Parcels of private property with the largest expropriated area and/or highest expropriation ratio;
- Private property parcels where both land and residential buildings are subject to expropriation, including permanently occupied dwellings;
- Parcels with seasonal or secondary residential structures (hobby gardens);
- Parcels where non-residential structures — such as agricultural storage facilities, animal shelters, and a pet burial ground — are subject to expropriation;
- Tenants and informal users of affected agricultural land;
- Parcels with potential cumulative impacts due to prior expropriations (e.g., wind turbines, railway, other infrastructure);
- Parcels located in the vicinity of the main construction camp, which will be the future O&M area;
- Neighbourhood heads (mukhtars) of all settlements where affected parcels are located, serving as key informants on land use, tenancy patterns, vulnerable individuals, and community-level concerns.

The list of meetings and consultations held by the RAP Consultant Team during the resettlement-scoping field visit is presented in Table 5-3. Details findings of the Resettlement-Scoping Field Visit are presented within the RAP Scoping Report, which has been submitted to the SPV as a stand-alone document (GEM, April 2026).

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

Stakeholder Group	Ref.	Institution / Neighbourhood	Person(s) Consulted / Locations Visited	Date
A. General Directorate of Highways (KGM)	1.	Public – Private Partnership Regional Directorate (**KÖSOB**)	• Chief Engineer for Properties • Valuation Control Engineer	3 December 2025
B. Governmental Institutions	2.	**Silivri** District Directorate of Agriculture and Forestry	• District Director • Technical Teams	1 December 2025
	3.	**Çorlu** District Directorate of Agriculture and Forestry	• District Director	1 December 2025
	4.	**Malkara** District Directorate of Agriculture and Forestry	• District Director	2 December 2025
C. Project-Affected Persons (PAPs) – Key Informants	5.	Istanbul, Silivri, **Değirmenköy**	• Muhtar	1 December 2025
	6.	Istanbul, Silivri, **Balaban**	• Muhtar	1 December 2025
	7.	Istanbul, Silivri, **Sancaktepe**	• Muhtar	1 December 2025
	8.	Tekirdağ, Süleymanpaşa, **Kayı**	• Muhtar and PAPs	2 December 2025

Stakeholder Group	Ref.	Institution / Neighbourhood	Person(s) Consulted / Locations Visited	Date
	9.	Tekirdağ, Süleymanpaşa, **Yağcı**	• Muhtar	2 December 2025
	10.	Tekirdağ, Süleymanpaşa, **İnecik**	• Muhtar, Council Member and PAPs	2 December 2025
	11.	Tekirdağ, Malkara, **Ahievran**	• Council Member and PAPs	2 December 2025
D. Project-Affected Persons – Affected Residences	12.	Tekirdağ, Süleymanpaşa, **Zafer**	**Permanent residence** Parcel no: 347/2 – 3 residential units • Owner (elderly female PAP permanently residing in affected units) • Owner's daughter (PAP permanently residing in affected units) • Owner's son-in-law (PAP permanently residing in affected units – consulted by phone)	2 December 2025
	13.	Istanbul, Silivri, **Sancaktepe**	**Seasonal residences (hobby gardens)** Parcel no: 130/2, 131/1, 131/23 – Seasonally used (weekend, holiday) residences and hobby gardens • Owner and user of neighbouring parcel not affected by the Project	1 December 2025
	14.	Tekirdağ, Süleymanpaşa, **Zafer**	**Vacant (unused) house** Parcel no: 345/50 Owner of land and house is deceased; heirs do not use the property.	2 December 2025
E. Project-Affected Persons – Affected Non-Residential Structures	15.	Tekirdağ, Süleymanpaşa, **İnecik**	**Affected agricultural storage facility** Parcel no: 205/107, 205/110 • Spouse of the owner of the affected storage facility (agricultural use)	2 December 2025
	16.	Tekirdağ, Süleymanpaşa, **İnecik**	**Affected poultry house/storage facility (reported to be idle)** Parcel no: 161/18	2 December 2025
	17.	Tekirdağ, Süleymanpaşa, **Kayı**	**Affected animal shelter (Tekirdağ Köpekköy)** Parcel no: 0/1615 • Staff of the affected animal shelter	2 December 2025
	18.	Tekirdağ, Süleymanpaşa, **Gündoğdu**	**Affected pet burial ground** Parcel no: 200/30 – No consultation conducted	2 December 2025
F. Project-Affected Persons – Affected Agricultural Land	19.	Tekirdağ, Süleymanpaşa, **Zafer**	**Affected agricultural land** • Parcel no: 345/49 – User of the affected land (tenant)	2 December 2025
	20.	Istanbul, Silivri, **Balaban**	**Affected agricultural land** Parcel no: 756/198, 756/1, 756/285 – Employee of the landowner	1 December 2025
	21.	Tekirdağ, Süleymanpaşa, **Kayı**	Parcel no: 0/1620	2 December 2025
G. Businesses Along the Route – Outside the Corridor, Relocation Not Anticipated	22.	Istanbul, Silivri, **Gümüşyaka**	Parcel no: 7878/5 – Cafer Akgün Forest Products	2 December 2025
	23.	Istanbul, Silivri, **Gümüşyaka**	Parcel no: 7859/8 – Şerif Hotel	2 December 2025
	24.	Tekirdağ, Süleymanpaşa, **Kayı**	Parcel no: 0/1545 – Tekin Business Centre	2 December 2025
	25.	Tekirdağ, Süleymanpaşa, **Kayı**	Parcel no: 0/1451 – Petrol Ofisi	2 December 2025

5.1.2.3. Component 3: RAP Field Surveys – Household-level

RAP field surveys included household-level livelihood interviews and focus group discussion with the affected people. The surveys methodology targeted the following:

- **Full census of affected residential, business (if any) and special-use structures**
- **Random sampling** for affected private and public lands and household-level livelihood interviews with their formal and informal users (sample size has been calculated for 95% confidence level and 5% margin of error)

Sampling Methodology

Sampling activities were carried out based on the expropriation plans and parcel data provided by the Special Purpose Vehicle (SPV). The sampling design aimed to ensure that the survey results are statistically robust and representative of all Project-Affected Persons (PAPs) within the motorway's expropriation corridor.

A stratified random sampling approach with proportional allocation was adopted. This method was selected in order to adequately capture the heterogeneity of affected parcels and households, particularly with respect to their geographical distribution, land use characteristics, and the presence of physical structures.

Sampling Parameters

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

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

Where:

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

This approach ensured that the selected sample size provides a reliable basis for statistical analysis and interpretation.

Sampling Strategy: Stratified Random Sampling (Proportional Allocation)

The sampling frame was stratified based on three core dimensions:

1) Geographical Distribution:

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

2) Land Registry Type:

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

3) Presence of Structures:

Specific consideration was given to parcels with existing structures:

- Parcels with affected business structures
- Parcels with affected houses

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

Non-Response Strategy: Replacement Sampling

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

The distribution of the main and reserve samples across the Project sections was as follows:

- Section 1 (KM 0–35): 174 main samples + 174 reserve samples
- Section 2 (KM 35–70): 122 main samples + 122 reserve samples
- Section 3 (KM 70–105): 79 main samples + 79 reserve samples

Within **Section 3** (KM 70–105), a total of 84 surveys were successfully completed. In addition, 1 respondent attended the interview but declined to answer the questionnaire. Therefore, the analysis was conducted based on 85 completed surveys.

Within the scope of the surveys, the RAP field team completed a total of **290 questionnaires across 30 different settlements** along the Motorway's route. In addition, mukhtar (settlement head) interviews were conducted in **29 of these settlements**. A breakdown of the number of questionnaires administered to affected households (including those with affected residential structures and/or agricultural lands), as well as affected businesses, is provided below in Section 5.2

The RAP survey design is presented in Table 5-4. The distribution of completed household-level questionnaires per settlement is provided in Table 5-5. A full census was targeted for affected residential structures and businesses. However, this target could not be achieved for residential structures in Section 1, where only six of the targeted 24 surveys were completed. This was because all affected residential structures in Section 1 are temporary or seasonal houses used as hobby gardens, weekend homes or summer homes, with no permanent residents. For the affected houses in Section 2, the surveys were conducted as planned, with one exception. One of the heirs of an owner who had died two years earlier was living in Germany and declined to participate in the survey. As part of the RAP implementation, the SPV CLOs has been engaging with the owners and users of all affected residential structures, whether permanent or temporary, to complete the vacating and, where applicable, the relocation processes in accordance with the principles of this RAP, following the completion of relevant expropriation procedures by the KGM – KÖSOB.

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Table 5-4. RAP Survey Design

Method	Target Group	Baseline Data to be Collected	Strategy	Sample Size (Number of Interviews/Questionnaires)	
				Target	Achieved
Key-informant interviews	Heads (mukhtars) of affected settlements in all affected neighbourhoods[72]	• General information on the settlement • Livelihoods and general economic conditions • Project awareness and perception • Project-related physical and economic displacement impacts in the settlement • Project-related displacement impacts on businesses in the settlement • Public lands affected by the Project • Vulnerability • Labour availability in the community	• Full census	Total: **30** • Section 1: 16 • Section 2: **3**[73] • Section 3: 11	Total: **29** (97%) • Section 1: 16 (100%) • Section 2: 3 (100%) • Section 3: 10 (91%)
Household-level questionnaires – physical displacement	**Affected residential structures (houses)** • **Owners/shareholders** of the affected houses • **Formal and informal users** of the affected houses (if any) (including women and households with vulnerable individuals)	• Affected lands and tenure • Household composition and vulnerability • Living standards and livelihoods • Affected house and physical displacement related aspects • Agricultural land use • Relocation planning • Compensation and assistance (including livelihood) preferences and needs	• Full census	Total: 31 • Section 1: 24 • Section 2: 7 • Section 3: 0	Total: 12 • Section 1: 6 • Section 2: 6 • Section 3: 0
Household-level livelihoods questionnaires – economic displacement	**Affected lands** • **Owners** of the affected agricultural lands • **Formal and informal users** of the agricultural lands (including women and households with vulnerable individuals)	• Affected lands and tenure • Household composition and vulnerability • Living standards and livelihoods • Agricultural land use • Compensation and assistance (including livelihood) preferences and needs	• Stratified random sampling	Total: 269 • Section 1: 174 • Section 2: 16 • Section 3: 79	Total: 274 • Section 1: 173 • Section 2: 17 • Section 3: 84
Business Interviews	**Affected business structures** • **Owners** of the affected business structures (employers) • **Formal and informal users** (tenants) of the affected business structures (employers) (if any)	• General legal and economic information on business (including tenure, business activity, financial data) • Information on employees • Details on business operations (customers, key suppliers) • Project awareness and perception • Relocation planning • Compensation and assistance (including livelihood) preferences and needs	• Full census	Total:5 • Section 1: 3 • Section 2: 2 • Section 3: 0	Total:4 • Section 1: 3 (100%) • Section 2: 1 (%50) • Section 3: 0
Focus Group Discussions	**Livestock Producers and Women**	• Women's daily lives, livelihoods, roles in agricultural activities, differentiated impacts on women and perceptions of impacts. • Livestock holdings and husbandry practices, use of pastures and common lands, access to water, fodder, and veterinary services, Project-related impacts on livestock livelihoods, and compensation, assistance, and livelihood restoration preferences and needs	• Selected settlements	Total:4 • Section 1: Alipaşa (women) and Çeşmeli • Section 3: İnecik and Seymenli	Total:4 • Section 1: 2 • Section 2: 0 • Section 3: 2

[72] All settlements (neighbourhoods) with the exception of settlements with marginal impacts (a few parcels) were included in the survey sample.

[73] There is a total of 12 settlements in Section 2. However, in this RAP, only the **three** settlements corresponding to **KM 58 – 60** were targeted. Surveys with the remainder of the settlements in this section will be planned following the completion of valuation and the preparation of structure valuation forms for the full alignment of Section 2.

Table 5-5. Distribution of Completed Household-level Livelihood Questionnaires per Settlements

Section	Province	District	Neighborhood	Total Number of Affected Parcels	Number of Questionnaires Completed			
					Affected House	Agricultural Land	Business	Total
KM 0-35	İstanbul	Silivri	Alipaşa	53	-	14	-	14
			Çeltik	151	4	24	-	28
			Semizkumlar	3	-	-	-	-
			Yolçatı	32	-	6	-	6
			Sancaktepe	105	-	9	-	9
			Balaban	193	1	22	-	23
			Değirmenköy	146	-	28	-	28
			Gümüşyaka	73	-	5	3	8
	Tekirdağ	Marmara ereğlisi	Sultanköy	11	-	2	-	2
			Cedit Ali Paşa	18	-	-	-	-
			Yakuplu	128	-	24	-	24
			Türkmenli	11	-	3	-	3
			Çeşmeli(**)	55	-	9	-	9
		Çorlu	Seymen	136	1	10	-	11
			Şahpaz	85	-	15	-	15
			Türkgücü	6	-	2	-	2
Sub-total KM 0-35			**16**	**1,206**	**6**	**173**	**3**	**182**
KM 35-70	Tekirdağ	Marmara ereğlisi	Çeşmeli(**)	11	-	-	-	-
		Çorlu	Yenice	48	-	-	-	-
			Maksutlu	3	-	-	-	-
		Süleyman paşa	Karaevli	41	-	-	-	-
			Husunlu	41	-	-	-	-
			Gazioğlu	252	-	-	-	-
			Köseilyas	70	-	-	-	-
			Kayı	97	-	3	1	4
			Eskicami	3	-	-	-	-
			Gündoğdu	107	-	-	-	-
			Aydoğdu	14	-	-	-	-
			Zafer	72	6	14	-	20
			Yağcı	119	-	-	-	-
Sub-total KM 35-70			**12**	**878**	**6**	**17**	**1**	**24**
KM 70-105	Tekirdağ	Süleyman paşa	Seymenli	65	-	9	-	9
			Güveçli	45	-	11	-	11
			Nusratlı	32	-	3	-	3
			Karahisarlı	23	-	-	-	-
			Nusratfakı	62	-	9	-	9
			İnecik	114	-	19	-	19
			Akçahalil	69	-	9	-	9
			Kınıklar	14	-	1	-	1
		Malkara	Yenice	50	-	5	-	5
			Hereke	39	-	7	-	7
			Ahievran	49	-	11	-	11
Sub-total KM 70-105			**11**	**562**	**0**	**84**	**0**	**84**
Total			**39**	**1,768**	**12**	**274**	**4**	**290**

During the RAP field surveys, questionnaires were completed with landowners or land users for specific parcels identified in the survey sample and affected by the Project. In many cases, however, these landowners and land users had additional affected parcels that were not included in the sample. Therefore, although the questionnaires focused on specific parcels, information on other parcels belonging to PAPs was also collected. Overall, data were obtained for a total of 1,678 parcels, representing over **27%** of all affected parcels across the Project, as summarised in Table 5-6.

Table 5-6. Number of Parcels Consulted during the RAP Surveys

Section	Total Number of Interviews as part of RAP Surveys	Total Number of Parcels Consulted during the RAP Surveys	Total Affected Parcel Number (Public + Legal Entity + Private)
Section 1: KM 0-35	176	514	1,206
Section 2: KM 35-70	18	28	878
Section 3: KM 70-105	84	186	562
Total	**278**	**727**	**2,646**

5.1.3. Surveys during RAP Implementation (after signing of the finance agreement for the Project)

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

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

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

5.1.4. RAP Field Survey Limitations

As part of the RAP field surveys, face-to-face interviews were conducted with the mukhtar (settlement head) of each settlement. **Key information interviews** were conducted in order to understand the general socio-economic characteristics of the settlements and gather the data required for the preparation of the RAP, and land user identifications were completed.

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

- The data obtained from the mukhtar interviews is largely based on the local knowledge and observations of the mukhtars. Information provided on topics such as the demographic structure of the settlements, livelihood activities, and agricultural production has not been separately verified against official records during the surveys, and the statements of the mukhtars have been taken as the basis. However, where available, official data has been resorted to and presented within the RAP (e.g. population).

- In some settlements, it was observed that information on land use and user profiles in particular was limited, due to mukhtars having been newly elected or not being sufficiently acquainted with the land users in the settlement. In settlements with high population density or where land ownership changed hands frequently, the mukhtars' knowledge regarding parcel users may have been limited. Nevertheless, land user identification was completed for the majority of the parcels surveyed, through the efforts of the survey team.

- All mukhtars contacted as part of the survey participated in the interviews, with the sole exception of the mukhtar of Nusratlı neighbourhood in Süleymanpaşa district (32 parcels affected in total, 27 private, 4treasury, and 1 road) who declined to participate despite being fully informed by the survey team of the purpose of the survey. For this reason, the mukhtar survey could not be administered in this settlement; however, information for the purposes of user identification was supplemented through interviews with residents of neighbouring settlements and local contacts.

Despite these limitations, it is assessed that the data obtained from the mukhtar interviews provided sufficient information for characterising the general socio-economic conditions of the settlements, identifying land users across all affected settlements, and interpreting the field findings for incorporation into the RAP assessments.

Following the mukhtar surveys, **household-level questionnaires** were completed with the affected households included in the RAP field survey sample. The following limitations related to field conditions and participant access were encountered during the administration of the questionnaires:

- The coincidence of the fieldwork period with Ramadan partially affected the conduct of the interviews. It was observed that fasting participants were more available in the early hours of the day, while in the afternoons they were unwilling to be interviewed due to fatigue and reduced concentration. For this reason, fieldwork was generally conducted between 10:00 and 15:30, and in some cases scheduled interviews could not be carried out in the first visit to the settlement. Therefore, the RAP field survey team had to conduct return visits to the same settlements to complete the questionnaires as planned.

- The timing of the field survey also coincided with rainy weather conditions as well as periods of intensive agricultural activities such as pesticide and fertiliser application. As a result, participation levels in certain settlements were lower than expected, leading to some planned interviews being postponed or not conducted.

- Although participants were contacted by telephone prior to the interviews to arrange appointments, there were instances where some participants who had confirmed appointments did not attend. In such cases, individuals from the reserve sample list were contacted and interviews were conducted in order to maintain the continuity of the field plan and achieve the targeted number of completed surveys.

- In some settlements, it was observed that landowners affected by expropriation who appeared as users in the sample were residing outside the settlement, which limited participation in the interviews. Some participants living outside the settlement were either unwilling to come for the interview or could not be reached. This situation limited the number of individuals with whom interviews could be conducted, particularly in certain neighbourhoods (i.e. İnecik, Nusratlı, Güveçli and Karahisarlı in Section 3). In such cases, individuals from the reserve sample lists were contacted and questionnaires were completed with them to achieve the targeted number of surveys.

- The comprehensive nature of the survey form was also found challenging by some participants, and the large number of questions in particular created reluctance among some participants towards the interview. A significant number of participants criticised the survey for being too long, which in some cases also affected the level of detail provided in responses. Nevertheless, the interviews were able to be completed thanks to the guidance and explanations provided by the field team.

- During the fieldwork, a significant number of participants raised questions regarding the expropriation process, payment schedule, legal proceedings, and the effects of the motorway on access to agricultural land. This led to discussions of topics outside the scope of the survey in some interviews and to interviews running longer than planned. Participants particularly requested clear information regarding construction timelines, payment schedules, and access to their land. The participation of the SPV's CLOs in the fieldwork enabled participants' questions to be addressed with the necessary information and ensured that the interviews were completed successfully.

- In certain settlements in Section 1, it was observed that participants did not have sufficient knowledge regarding the Project route, expropriation process, and construction activities. The land price information shared during expropriation meetings was perceived differently across neighbouring settlements, and expectations shaped accordingly influenced participant behaviour, at times negatively. In settlements where the expropriation process had not yet started, field survey teams were frequently required to respond to detailed questions about the Project, some of which fell outside the scope of the study, leading to misunderstandings regarding the role of the field survey team.

- Some participants stated that expropriation payments had not been made on time, which contributed to a lack of trust towards the field survey. Additionally, there is a widespread perception that the proposed compensation values do not reflect local realities, which was observed to reduce participation rates, particularly in settlements where expropriation negotiations had already taken place.

- In settlements where the expropriation process had not yet started in Section 1, field teams were frequently required to respond to detailed questions about the Project. Some of these questions fell outside the scope of the study, causing interviews to take longer than planned.

- In the Silivri region in particular, the frequent transfer of land for investment purposes and the continuous change of users constituted an important limitation affecting data reliability. In addition, the widespread presence of unregistered or informal structures – often used temporarily – made it difficult to identify users and verify information; in some cases, even neighbouring users were unwilling to provide information about one another.

- Some participants in Section 1 expressed concerns about the expropriation process conducted to date and the adequacy of compensation rates and their alignment with market prices. These concerns have, in some cases, resulted in an unwillingness to participate in the surveys and negatively affected the trust of PAPs towards the fieldwork.

- The dispersed and spatially scattered structure of the settlements in Section 1, combined with the practice of farmers leasing land from different neighbourhoods, made it difficult to identify actual land users. Since land use is largely based on rental arrangements and users may change annually, inconsistencies were observed in user information. The fact that tenants operate across multiple settlements further complicated communication and verification processes. In this context, the limited involvement or insufficient knowledge of mukhtars in some areas also constrained access to participants. The RAP field survey teams made additional efforts and engaged with local people to overcome this limitation to the extent possible.

- It was observed that participants approached questions related to economic indicators – particularly land size, production quantities, and annual income – with caution. Many participants were reluctant to share such information, and in some cases were considered to have deliberately underreported their responses. The RAP field survey teams made additional efforts to inform the PAPs about the purpose of the study and the value of the information to be collected for the design of the RAP, to minimise this key limitation to the extent possible.

- It was observed that the field survey was often perceived by participants as a process disconnected from decision-making and unlikely to produce tangible outcomes. This perception directly affected both participation levels and the reliability of the information provided.

These limitations were taken into account during data interpretation, and wherever possible, different data sources such as key informant interviews, household-level surveys, and focus group discussions supplemented by the data from focus group discussions with the affected people (i.e. animal breeders in İnecik and Seymenli in Section 3) were evaluated together in the analyses.

Despite the limitations mentioned, it was assessed that the data obtained as a result of the RAP field surveys conducted is sufficient for analysing the socio-economic characteristics of households within the survey sample and for carrying out the assessments required within the scope of the RAP.

5.2. Socio-economic Baseline

5.2.1. Geographical Overview

The information on the characteristics of each district is provided in the following sub-sections based on meetings held with the District Directorates of Agriculture and Forestry, field observations along the Project route, and review of the available data from public resources.

Silivri District[74]

Silivri is a port city located on the coast of the Marmara Sea, with a surface area of 860 km². The district consists of undulating plains and hilly terrain divided by streams at elevations between 100 m and 200 m. A large portion of the land is flat. The climate is characterised by hot, dry summers and cool, rainy winters. With an annual average rainfall of 530 mm, Silivri is one of the least rainy areas along the Marmara coast.

Due to the fertility of its soils, various cultivated crops are grown in the district. Fruit production **includes apples, pears, peaches, sour cherries, quinces, plums, apricots, figs, hazelnuts, wild apricots, cherries, almonds and mulberries**. Dry farming areas produce **wheat, sunflower, maize, oats, barley and onions**. Forest areas are located in the northern and central parts of the district, consisting mainly of thin-trunked trees and shrubs.

With 38,202 hectares of **cultivated land,** Silivri accounts for 56% of Istanbul's total agricultural land (68,191hectares), making it the district with the largest agricultural area.

In terms of **livestock production**, Silivri accounts for 14.8% of cattle, 19.1% of sheep, 13.2% of goats, 14.4% of milk production, 9% of honey production, and 87.6% of poultry production within Istanbul.

Approximately 15,000 people are employed in industrial facilities in the district. Around 90% of businesses export goods. Silivri contributes approximately 2% to Türkiye's total annual exports. The industrial sector accounts for 29% of the district economy and includes 195 factories, 74 workshops, 35 manufacturing plants and 13 warehouses. Of the industrial firms, 25% operate in metallurgy and machinery, 14% in chemicals, 12% in textiles, 11% in food, 10% in plastics, 7% in construction, 6% in furniture, 5% in packaging and 10% in other industries (feed, wood, energy, industrial gases, etc.). Some manufacturing facilities operate without licenses.

Çorlu District[75]

Çorlu is located at an elevation of 150 – 180 m above sea level. It lies within the Ergene Basin and is centrally positioned in Thrace. It borders Silivri (Istanbul) to the east, and the Marmara Sea and Marmaraereğlisi to the south.

Çorlu is the **fourth** largest district in Tekirdağ by area. The highest parts are formed by ridges extending from the Yıldız (Istranca) Mountains. Much of the land lies within the Ergene Basin, a deposition area formed by sediments transported from the Yıldız Mountains. The area also marks the watershed boundary between the Ergene Basin and the Marmara coast.

With its favourable natural conditions, strong transport links and strategic importance, Çorlu is the **most developed district in Tekirdağ**. It is the second largest settlement in Thrace after Istanbul and has a larger population than the provincial centre.

The district generally has flat and fertile land. Due to its inland location, it has a continental climate, with hot, dry summers and cold, rainy winters. It is one of the least rainy regions in Thrace. Precipitation is distributed as follows: 20% in spring, 10% in summer, 30% in autumn and 40% in winter.

The Ergene River flows 12 km north of Çorlu and is a tributary of the Meriç River. It is used for irrigation. With **abundant groundwater** and available industrial land, it is a major centre for chemical, leather and textile industries, with strong potential for further growth.

Natural gas has been discovered in the region through drilling activities by Turkish Petroleum Corporation, and drilling continues.

Çorlu has 31,400 hectares of **cultivated land**, representing 7.5% of Tekirdağ's total agricultural land (415,261hectares). **Livestock production** accounts for 2.6% of cattle, 5.4% of sheep and 0.2% of goats in the province.

[74]Anonymous, 2026. General Information about Silivri, http://cdn.istanbul.edu.tr/..., Accessed: 18.03.2026).
[75]Anonymous, 2026. General Information about Çorlu District, https://www.corlutso.org.tr/uploads/docs/ekonomik_rapor_2019.pdf, Accessed: 18.03.2026; Anonymous, 2026. Tekirdağ Provincial Agriculture Report, https://tekirdag.tarimorman.gov.tr/..., Accessed: 18.03.2026.

Marmaraereğlisi District[76]

Marmaraereğlisi is located along the Istanbul – İpsala Highway and has a geographically advantageous position due to its proximity to Tekirdağ, İstanbul, Çerkezköy and Çorlu, as well as its coastal location, which also enables easy access by sea. The district consists of settlements with relatively low population density both along the coast and inland areas.

It has significant assets including agriculture and livestock activities, fish restaurants, and industrial facilities and zones. With improved integration with surrounding cities, transport networks and industrial areas, as well as development in human resources, the service sector and tourism, Marmaraereğlisi is becoming an attractive coastal resort town and an important transit point.

The district has 15,644 hectares of **cultivated agricultural land**, representing 3.8% of Tekirdağ's total agricultural land (415,261 hectares). In terms of **livestock production**, it accounts for 2.7% of cattle, 3.7% of sheep and 1.4% of goats within the province.

Marmaraereğlisi has significant industrial and agricultural production areas, and there are plans to expand industrial zones within the district. Although agriculture has been somewhat negatively affected (indirectly) by industrial development, it remains one of the key economic activities. Efforts to promote fruit and vegetable production, the development of small livestock farming and similar alternatives are expected to contribute to increasing farmers' incomes. Currently, there are orchards and vineyards producing wine grapes in the surrounding area.

Süleymanpaşa District[77]

The district economy is primarily driven by **land-based agriculture**, regional and transit tourism, and businesses operating in the production and service sectors. Across the district, there are two ports and brick factories reflecting its sectoral diversity. In addition, Süleymanpaşa has a total of 23 agricultural cooperatives, including 18 Agricultural Development Cooperatives, 3 Fisheries Cooperatives and 2 Irrigation Cooperatives.

Süleymanpaşa has 75,931 hectares of **cultivated agricultural lan**d, representing 18.3% of Tekirdağ's total agricultural land (415,261 hectares). In terms of **livestock production**, the district accounts for 13.2% of cattle, 17.2% of sheep and 17.6% of goats in the province.

Malkara District[78]

Malkara is characterised by large geographical area, fertile soils, favourable climatic conditions and dynamic population. Approximately **85% of the district population is engaged in agricultural activities**. **Its industry is predominantly agriculture-based**, with dairy production, agricultural product processing, and agricultural machinery manufacturing being the most developed industrial sectors.

Malkara has 79,567 hectares of **cultivated agricultural land**, representing 19.2% of Tekirdağ's total agricultural land (415,261 hectares). In terms of **livestock production**, the district accounts for 37.0% of cattle, 24.0% of sheep and 35.5% of goats in the province.

The district has the Karaidemir Dam and eight irrigation ponds for irrigation purposes. Excluding the dam, the total irrigation capacity is 17,862 decares, while 7,000 decares are currently irrigated. Including irrigation from the dam, a total of 55,000 decares of land is irrigated. In irrigated areas, silage maize, sunflower and, to a lesser extent, vegetables are cultivated as second crops. However, irrigation is not practised on most of the lands along the Project route. The main crops cultivated are **wheat, sunflower and fodder crops**.

Agricultural practices are modern, with all stages – including land preparation, sowing, spraying, fertilisation, harvesting and threshing – carried out using machinery. In addition, high-yield and disease-resistant seeds are used, particularly for wheat and sunflower.

Malkara also has significant potential in **livestock production**. In recent years, investments and services provided under the Union for Villages Service Delivery (*Köylere Hizmet Götürme Birliği*) have substantially increased both the quality and quantity of livestock production. Livestock farming has become a leading component of the agricultural sector, particularly contributing to increased income in rural areas. In addition to dairy farming, beef production has also grown considerably. The number of small ruminants has decreased in parallel with the increase in large livestock. Poultry production for meat and eggs is also notable. Livestock accounts for more than 50% of total agricultural income in the district, whereas this ratio is generally below 25% across Türkiye.

The district is also rich in natural resources, particularly lignite coal, and currently hosts 67 active coal mines within its boundaries.

[76]Anonymous, 2026. General Information about Marmaraereğlisi District, https://www.trakyaka.org.tr/..., Accessed: 18.03.2026.
[77]Anonymous, 2026. General Information about Süleymanpaşa District, https://tekirdag.ktb.gov.tr/TR-208639/suleymanpasa.html, Accessed: 18.03.2026.
[78]Anonymous, 2026. Malkara Agriculture and Livestock, https://www.malkara.bel.tr/malkara/tarim-ve-hayvancilik, Accessed: 18.03.2026; Anonymous, 2026. Malkara Economy, https://www.malkaratso.org.tr/tr/kategori/malkara-malkara-ekonomisi, Accessed: 18.03.2026.

5.2.2. Administrative Organisation

İstanbul and **Tekirdağ** provinces **are both governed by metropolitan municipalities**.

İstanbul has been a metropolitan municipality since 1984, following the adoption of the Metropolitan Municipality Decree and the publication of the Decree-Law on the Administration of Metropolitan Municipalities.

Tekirdağ was designated as a metropolitan municipality in 2012 with the enactment of Law No. 6360[79], which expanded the boundaries of metropolitan municipalities like Tekirdağ to cover the entire province and mandated a significant change in local governance and administrative units. Consequently, all villages ("*köy*") and towns ("*belde*") within Tekirdağ's provincial borders were officially reclassified as neighbourhoods ("*mahalle*, both administratively and legally). This reclassification became effective after the local elections on 30 March 2014, when Law No. 6360 was fully implemented. Regardless of their population size or rural characteristics, every settlement in Tekirdağ is now legally a **neighbourhood**. On the other hand, in practice and in everyday language, the rural way of life, identity, and usage of the term "*village*" continue. In daily life and cultural practice, people may still refer to these places as villages, and rural lifestyles persist. But from a legal-administrative point of view under metropolitan governance, all settlements – regardless of their population – are now "neighbourhoods".

5.2.3. Affected Settlements

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

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

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

- **Population Size:** Settlements are classified as small, medium, or large according to total population.
- **Primary Livelihood Sources:** Settlements are categorised based on predominant means of income, such as agriculture or tourism.
- **Demographic Profile:** Communities are analysed with attention to their age structure (e.g., aging population, youth-dominated villages).

[79] Law on the Establishment of Metropolitan Municipalities in Fourteen Provinces and Twenty-Seven Districts and Amendments to Certain Laws and Decree Laws published in the Official Gazette dated 6 December 2023 and numbered 28489.

5.2.3.1. Population of Neighbourhoods

Table 5-7 presents the 2025 population figures for all settlements affected by Motorway's expropriation corridor, based on data from the Turkish Statistical Institute (TURKSTAT, 2026).

Population sizes vary considerably across the affected settlements, ranging from as few as 66 inhabitants (Maksutlu, Çorlu district) to as many as 37,159 (Şemizkumlar, Silivri district) in İstanbul, and up to 15,440 (Eskicami/Ortacami, Süleymanpaşa district) in Tekirdağ. Many other settlements have relatively smaller populations, particularly in districts such as Çorlu and Marmaraereğlisi. This variation reflects a mix of more densely populated urban or semi-urban settlements alongside smaller, more rural communities.

Table 5-7. Population of Affected Settlements (2025)

İstanbul		Tekirdağ	
Neighbourhood	**Population**	**Neighbourhood**	**Population**
Silivri district		**Çorlu district**	
Alipaşa	1,085	Seymen	1,043
Yolçatı	382	Şahpaz	509
Semizkumlar	37,159	Türkgücü	1,100
Çeltik	1,080	Yenice	2,314
Sancaktepe	6,448	Maksutlu	66
Balaban	4,885	**Malkara district**	
Değirmenköy	7159	Yenice	97
Gümüşyaka	9,930	Hereke	259
		Ahievran	275
		Marmaraereğlisi district	
		Sultanköy	2,763
		Cedit Ali Paşa	2,177
		Yakuplu	321
		Türkmenli	341
		Çeşmeli	894
		Süleymanpaşa district	
		Karaevli	198
		Husunlar	288
		Gazioğlu	289
		Köseilyas	2,017
		Kayı	323
		Eskicami (Ortacami)(*)	15,440
		Gündoğdu (Atatürk) (**)	6,235
		Aydoğdu	10,362
		Zafer	8,613
		Nusratlı	232
		Yağcı	503
		Karahisarlı	175
		Seymenli	172
		Güveçli	73
		Nusratfakı	73
		İnecik	533
		Akçahalil	138
		Kınıklar	140

Source: TURKSTAT, 2026.

(*) In line with the Municipal Council decision taken by the Süleymanpaşa Municipality City Council, the name "Eskicami-Ortacami neighbourhood" has been changed to "Ortacami neighborhood." (Source: https://kentkonseyi.suleymanpasa.bel.tr/eskicami-ortacami-mahallesi)
(**) In line with the Municipal Council decision taken by the Süleymanpaşa Municipality City Council, the name "Gündoğdu-Turgut neighbourhood" has been changed to "Atatürk neighbourhood." (Source: https://kentkonseyi.suleymanpasa.bel.tr/gundogdu---turgut-mahallesi)

Table 5-8 shows substantial variation in neighbourhood population sizes across the affected districts, both within and between locations. Silivri stands out with the highest mean population (8,516) and the greatest variability (standard deviation 12,061.74), indicating the presence of both very large and relatively smaller settlements. Süleymanpaşa also demonstrates notable internal variation, with a wide range between its minimum (73) and maximum (15,440) values. In contrast, districts such as Marmaraereğlisi and Çorlu have lower mean populations and more moderate variability, suggesting comparatively smaller and more consistent settlement sizes. Malkara has the lowest mean population (210) and minimal variation, reflecting a predominantly small-scale settlement and homogenous structure. Overall, the data highlight a heterogeneous population distribution, with a mix of densely populated and sparsely populated neighbourhoods across the Project area.

Table 5-8. Summary Statistics of Neighbourhood Populations in Affected Districts

Section	District	Number of Settlements	Minimum Population	Maximum Population	Mean Population	Standard Deviation
All affected neighbourhoods		39	66	37,159	3,233.10	6,641.72
Section 1 and 2	Silivri	8	382	37,159	8,516.00	12,061.74
	Marmaraereğlisi	5	321	2,763	1,299.00	1,112.71
	Çorlu	5	66	2,314	1,006.40	844.35
Section 3	Süleymanpaşa	18	73	15,440	2,544.68	4,520.19
	Malkara	3	97	275	210.33	98.48

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

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

The distribution of the settlements by size is presented in Table 5-9. The table shows that the majority of the 39 affected neighbourhoods (22, or 56%) are small villages below 1,000inhabitants, concentrated particularly in Section 3 (KM 70 – 105), which contains no medium or large settlements. Medium and large settlements are confined to Sections 1 and 2, with large settlements (5,000+) split equally between Silivri (Section 1) and Süleymanpaşa (Section 2) districts.

Table 5-9. Distribution of Settlements according to their Size

Section	Settlement Size			Total
	Small (0 – 999)	Medium (1,000 – 4,999)	Large (>5,000)	
Section 1 (KM 0 – 35)	**Silivri:** Yolçatı **Çorlu:** Şahpaz **Marmaraereğlisi:** Yakuplu; Türkmenli	**Silivri:** Alipaşa; Çeltik;Balaban **Çorlu:** Seymen; Türkgücü; Yenice **Marmaraereğlisi:** Sultanköy; Cedit Ali Paşa	**Silivri:**Semizkumlar; Sancaktepe; Değirmenköy; Gümüşyaka	**16**
	4	**8**	**4**	
Section 2 (35 – 70)	**Çorlu:** Maksutlu **Marmaraereğlisi:** Çeşmeli **Süleymanpaşa:** Karaevli; Husunlu; Gazioğlu; Kavlı; Yağcı	**Süleymanpaşa:** Köseilyas	**Süleymanpaşa:** Eskicami; Gündoğdu; Aydoğdu; Zafer	**12**
	7	**1**	**4**	
Section 3 (70 – 105)	**Süleymanpaşa:** Seymenli; Güveçli; Nusratlı; Karahisarlı; Nusratfakı; İnecik; Akçahalil; Kınıklar **Malkara:** Yenice; Hereke; Ahievran	-	-	**11**
	11	0	0	
Total	**22**	**9**	**8**	**39**

5.2.3.2. Population Growth Trends

As presented in Table 5-10, population trends in the last five years in affected settlements across the Motorway corridor vary considerably by section. Overall, the corridor exhibits a clear spatial pattern: growing peri-urban settlements in the western section contrast with declining rural communities in the eastern section.

In Section 1 (KM 0 – 35), population growth is the dominant trend, with 10 out of 16 surveyed neighbourhoods reporting an increase over the last five years, driven primarily by settlements in Silivri and Marmaraereğlisi districts. This growth trend is driven by a combination of proximity to Istanbul and improved accessibility, with residents relocating from the city due to earthquake concerns, the COVID-19 pandemic, and the availability of affordable land, alongside the relocation of industrial facilities from Istanbul to the area and a growing influx of seasonal and permanent second-home owners. Only two neighbourhoods Seymen, Çorlu and Türkmenli, Marmaraereğlisi recorded a population decline, while four remained stable.

Survey data for Section 2 (KM 35–70) is partially available. Due to the planned commencement of construction activities at the main camp site within KM 58–60, surveys have been completed in two settlements (Kayı and Zafer[80]). Surveys in the remaining areas will be scheduled following the cadastral approval of the expropriation plans.

Population trends in Section 2 (KM 35–70) indicate a generally stable demographic structure with localized variations. In Kayı, the population has remained largely unchanged; however, out-migration is anticipated in the future, primarily driven by limited access to heating and education services. In contrast, Zafer has experienced population growth, attributed to its integration within the metropolitan area and its relative attractiveness for in-migration. Overall, while no uniform trend is observed across the section, proximity to urban centers appears to be a key driver of population increase, whereas service limitations may contribute to out-migration in more rural settlements.

In Section 3 (KM 70 – 105), the trend reverses markedly, with 5 out of 10 surveyed neighbourhoods reporting a decline reflecting rural outmigration driven by limited economic opportunities and an ageing population. The remaining 5 neighbourhoods in this section reported stable populations, and none recorded an increase.

Table 5-10. Population Changes in the Neighbourhoods in the Last Five Years

Section	Settlement Size			Total
	Unchanged	Decreased	Increased	
Section 1 (KM 0 – 35)	**Silivri**: Alipaşa; Yolçatı **Çorlu**: Türkgücü **Marmaraereğlisi**: Sultanköy	**Çorlu:** Seymen **Marmaraereğlisi:** Türkmenli	**Silivri**: Çeltik; Semizkumlar; Sancaktepe; Balaban; Değirmenköy; Gümüşyaka **Çorlu**: Şahpaz **Marmaraereğlisi**: Yakuplu; Çeşmeli, Ceditalipaşa	
	4	**2**	**10**	**16**
Section 2 (35 – 70)	**Süleymanpaşa:** Kayı	-	**Süleymanpaşa:** Zafer	
	1	**0**	**1**	**2**
Section 3 (70 – 105)	**Süleymanpaşa:** Seymenli; Nusratfakı; İnecik; Kınıklar **Malkara:** Yenice	**Süleymanpaşa:** Güveçli; Karahisarlı; Akçahalil **Malkara:** Hereke; Ahievran	-	
	5	**5**	**0**	**10**
Total	**10**	**7**	**11**	**28**

[80] As per the expropriation plan, Eskicami neighbourhood, one of the three neighbourhoods within the KM 58–60 corridor, was excluded from the sample as it contains only 3 affected parcels.

5.2.3.3. Livelihood Sources

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

Survey data for Section 2 (KM 35–70) is partially available. Due to the planned commencement of construction activities at the main camp site within KM 58–60, surveys have been completed in two settlements[81] (Kayı and Zafer). Surveys in the remaining areas will be scheduled following the cadastral approval of the expropriation plans.

5.2.3.3.1. Main Sources of Livelihood

Table 5-11 presents the relative importance of livelihood sources across affected neighbourhoods surveyed through the key-informant interviews held as part of RAP field surveys. In this table, livelihood sources are rated on a five-point scale where 1 = very important, 2= important, 3 = moderate, 4 = negligible, and 5 = absent.

Agriculture (open field cultivation) is the dominant livelihood source across all three sections of the Project, rated as "very important" (score 1) by the overwhelming majority of settlements, including every neighbourhood in Section 3 and Kayı in Section 2. Only Sancaktepe, Balaban, and Gümüşyaka in Section 1 rated it as "important" (score 2), suggesting greater reliance on other income sources in these communities. In Section 2, Zafer rated agriculture as moderately important. (Score 3)

Livestock is the second most widespread livelihood source. In Section 1, it is rated as important (score 2) in several settlements – Yolçatı in Silivri; Yakuplu and Türkmenli in Marmaraereğlisi; and Şahpaz and Türkgücü in Çorlu – while most remaining Section 1 settlements rate it as moderate (score 3). Sancaktepe is the notable exception, where livestock is absent (score 5). In Section 2, it is rated as very important (score 1) in Kayı while Zafer rate it absent (score 5). In Section 3, livestock is rated as important (score 2) across the majority of Süleymanpaşa and Malkara settlements, with Güveçli and Hereke rating it as very important (score 1), and Seymenli as moderate (score 3). The rest of Section 2 data are pending field surveys.

Fruit and vegetable production shows considerable variation. In Section 1, it is absent (score 5) or negligible (4) in the majority of settlements and is rated as important (score 2) only in Yolçatı, Sultanköy, Yakuplu, and Seymen. In Section 2, it is rated as negligible (score 4) in Zafer and absent (score 5) in Kayı. In Section 3, it is broadly absent (score 5) or negligible (score 4) and rated as important only in Akçahalil, Kınıklar, and Ahievran.

Industrial labour is absent across all Section 3 settlements and in the majority of Section 1, with the notable exception of Sancaktepe and Balaban, where it is rated as very important (score 1), and Çeltik, Semizkumlar, and Değirmenköy, where it is rated as important (score 2), reflecting the proximity of these settlements to industrial activity along the western corridor. In Section 2, it is rated as important (score 2) in Zafer.

Retirement income is a consistent supplementary source across virtually all settlements, rated as moderate (score 3) in the majority of settlements in both Section 1 and Section 3. In Section 1, it is the primary income source in Semizkumlar (score 1) and an important secondary source (score 2) in Çeltik, Balaban, Yakuplu, Çeşmeli, and Türkgücü (score 2). In Section 2, both Kayı and Zafer rate retirement income as moderate (score 3). In Section 3, retirement income is particularly significant in Ahievran, where it is rated as very important (score 1), and in Seymenli, where it is rated as important (score 2).

Other livelihood activities include trade, transport, construction, and in one case greenhouse farming. These play a minor but notable supplementary role in a number of settlements, most prominently in Gümüşyaka where trade is rated as "very important" (score 1). In Section 2, in Zafer, public sector employment is rated as important (score 2) due to the presence of military housing in the area. In addition, construction activities is also rated as important (score 2). Furthermore, given the relatively high proportion of Roma population in the settlement, social assistance is rated as moderate (Score 3).

[81] As per the expropriation plan, Eskicami neighbourhood, one of the three neighbourhoods within the KM 58–60 corridor, was excluded from the sample as it contains only 3 affected parcels.

Table 5-11. Importance of Livelihood Sources per Neighbourhood

Section	Province, District	Neighborhood	Livelihood Sources					
			Agriculture	Livestock	Fruit & Vegetable	Industrial Labour	Retirement Income	Others[82]
Section 1 (KM 0 – 35)	İstanbul, **Silivri**	Alipaşa	1	3	5	5	4	5
		Çeltik	1	3	5	2	2	3
		Semizkumlar	5	5	5	2	1	3
		Yolçatı	1	2	2	5	4	4
		Sancaktepe	2	5	5	1	5	5
		Balaban	2	4	5	1	2	5
		Değirmenköy	1	3	5	2	3	3
		Gümüşyaka	2	3	5	5	3	1
	Tekirdağ, **Marmaraereğlisi**	Sultanköy	1	3	2	5	3	4
		Cedit Ali Paşa	1	3	4	3	3	2
		Yakuplu	1	2	2	5	2	4
		Türkmenli	1	2	5	5	3	5
		Çeşmeli	1	3	5	5	2	5
	Tekirdağ, **Çorlu**	Seymen	1	3	2	4	3	5
		Şahpaz	1	2	5	5	3	5
		Türkgücü	1	2	5	5	2	5
Section 2 (KM 35–70)	Tekirdağ, **Çorlu**	Yenice	TBD	TBD	TBD	TBD	TBD	TBD
		Maksutlu	TBD	TBD	TBD	TBD	TBD	TBD
	Tekirdağ, **Süleymanpaşa**	Karaevli	TBD	TBD	TBD	TBD	TBD	TBD
		Husunlu	TBD	TBD	TBD	TBD	TBD	TBD
		Gazioğlu	TBD	TBD	TBD	TBD	TBD	TBD
		Köseilyas	TBD	TBD	TBD	TBD	TBD	TBD
		Kayı	1	1	5	5	3	1
		Eskicami[83]	-	-	-	-	-	-
		Gündoğdu	TBD	TBD	TBD	TBD	TBD	TBD
		Aydoğdu	TBD	TBD	TBD	TBD	TBD	TBD
		Zafer	3	5	4	2	3	3
		Yağcı	TBD	TBD	TBD	TBD	TBD	TBD
Section 3 (KM 70 – 105)	Tekirdağ, **Süleymanpaşa**	Seymenli	1	3	4	5	2	3
		Güveçli	1	1	4	5	5	5
		Karahisarlı	1	2	5	5	3	3
		Nusratfakı	1	2	4	5	3	2
		İnecik	1	2	5	5	3	3
		Akçahalil	1	2	2	5	3	4
		Kınıklar	1	2	2	5	3	3
	Tekirdağ, **Malkara**	Yenice	1	2	5	5	3	4
		Hereke	1	1	5	5	3	5
		Ahievran	1	2	2	5	1	3

[82]Others include transport, trade, construction, greenhouse, and social assistance.
[83] As per the expropriation plan, Eskicami neighbourhood, one of the three neighbourhoods within the KM 58–60 corridor, was excluded from the sample as it contains only 3 affected parcels.

5.2.3.3.2. Agriculture

The interviews with mukhtars reveal that agriculture is the most important economic activity in all affected neighbourhoods.

The main agricultural products reported by the mukhtars are listed in Table 5-12. Overall, agricultural livelihoods in the surveyed settlements remain predominantly based on open-field cultivation. Wheat and sunflower are the dominant crops cultivated across all surveyed settlements in both Section 1 and Section 3, reflecting the region's predominantly dryland agricultural character. As confirmed also by KÖSOB (December 2025), there are no enclosed orchards in the area through which the route passes. Tree species and ages vary significantly. There are no single-type olive, walnut, or pomegranate orchards. Parcels generally contain two or three different tree species.

In Section 1, the majority of Silivri settlements also cultivate barley and canola/rapeseed alongside these crops, indicating a diversified but still field-crop-oriented production system, while Semizkumlar stands out as the most limited in crop variety, producing only wheat and sunflower. The Marmaraereğlisi settlements broadly follow the same wheat-sunflower-canola pattern, with Sultanköy being the notable exception where melon and watermelon cultivation is observed, and Yakuplu standing out for the inclusion of fodder crops. In Çorlu, the three settlements again rotate around the wheat-barley-canola core, with Seymen adding melon as a supplementary crop.

In Section 2, Kayı and Zafer settlements exhibit a relatively simple and predominantly field-crop-based agricultural structure, largely dependent on rainfed production. In both settlements, agricultural activities are primarily centred on staple crops such as wheat and sunflower, with limited diversification into other crop types such as onion, melon, and watermelon. Compared to more diversified settlements along the corridor, agricultural production in these locations remains less varied and more sensitive to climatic conditions.

Key informant inputs from mukhtars indicate that greenhouse cultivation is not practiced in either Kayı or Zafer, and there is no indication of protected or intensive agricultural production systems. Agricultural practices are therefore largely traditional and low-input, relying on seasonal precipitation rather than controlled cultivation environments.

Irrigation infrastructure is absent in both settlements, and agricultural production is almost entirely rainfed. No formal irrigation systems, such as canals, ponds, or cooperative-managed schemes, were reported. As a result, crop yields and production stability are closely linked to rainfall patterns, increasing vulnerability to drought and seasonal variability. Overall, agriculture in Kayı and Zafer is characterised by low diversification, limited infrastructure, and a high dependence on natural conditions.

Section 3 settlements in Süleymanpaşa and Malkara show a simpler and more uniform crop profile than Section 1, dominated almost exclusively by wheat, sunflower, and canola/rapeseed, with the only notable deviations being Kınıklar, where vegetables and fruits (tomato, onion, melon and water melon) are also grown, and Ahievren, which presents the most diversified profile across the entire corridor, cultivating melon, watermelon, onion, and fodder crops alongside the main field crops.

Key informant interviews with mukhtars indicate that greenhouse cultivation plays a very limited role in the agricultural activities of the affected settlements. Greenhouse farming was reported only in the Değirmenköy neighbourhood of Silivri, where approximately ten households are engaged in greenhouse cultivation, though there are no greenhouses affected by the Project within the Motorway's expropriation corridor. Apart from this limited practice, greenhouse-based agricultural production is not common across the Project area.

Irrigation is largely absent across the affected settlements, with the overwhelming majority of settlements in all three sections reporting no water source for agricultural irrigation. The few exceptions are concentrated in Section 1 Silivri, Değirmenköy, which has the most developed irrigation infrastructure, with a river and canal system supporting a 20,000-dekar irrigated area through a functioning cooperative, enabling maize and vegetable cultivation, though the system requires maintenance. Yolçatı uses an old village canal irrigating approximately 250da, though the canal is reported to be in disrepair. Sancaktepe has some artesian well users, though extracting groundwater requires permits and is reported as difficult. Gümüşyaka has a small pond enabling irrigation of approximately 200 da. In Çorlu, irrigation opportunities are limited, and agriculture is generally rainfed. In Section 3, İnecik is the only settlement with any water access, using a stream as a source, but with no organised system and each household irrigates individually by pump. Hereke in Malkara has a dam nearby with five households using motor pumps, and notes that a pressurised closed irrigation system would significantly expand the irrigable area if constructed. However, the irrigated lands in the affected settlements are located outside the Motorway's expropriation corridor.

Seasonal agricultural labour is almost entirely absent across the affected settlements. The sole exception is Akçahalil in Section 3 Süleymanpaşa, where the presence of seasonal workers is confirmed and described as domestic (i.e. local or Turkish, rather than migrant). The absence of seasonal agricultural labour across the corridor is consistent with the predominantly dryland cereal and sunflower farming character of the area, which is largely mechanised and does not require the intensive seasonal labour typically associated with horticultural or fruit and vegetable production.

Table 5-12. Main Agricultural Products by Neighbourhood

Section	Province, District	Neighborhood	Main Agricultural Products Cultivated in the Affected Settlement
Section 1 (KM 0 – 35)	İstanbul, **Silivri**	Alipaşa, Çeltik, Yolçatı, Sancaktepe, Balaban, Değirmenköy, Gümüşyaka	Wheat, Sunflower, Barley, Canola/Rapeseed
		Semizkumlar	Wheat, Sunflower
	Tekirdağ, **Marmaraereğlisi**	Sultanköy	Wheat, Sunflower, Canola/Rapeseed, Melon, Watermelon
		Cedit Ali Paşa	Wheat, Sunflower
		Yakuplu	Wheat, Sunflower, Canola/Rapeseed, Barley, Fodde crops
		Türkmenli	Wheat, Sunflower, Canola/Rapeseed
		Çeşmeli	Wheat, Sunflower, Canola/Rapeseed, Barley
	Tekirdağ, **Çorlu**	Seymen	Wheat, Sunflower, Barley, Canola/Rapeseed, Melon
		Şahpaz	Wheat, Barley, Canola/Rapeseed
		Türkgücü	Wheat, Sunflower, Barley, Canola/Rapeseed
Section 2 (KM 35–70)	Tekirdağ, **Çorlu**	Yenice, Maksutlu	TBD
	Tekirdağ, **Süleymanpaşa**	Karaevli, Husunlu, Gazioğlu, Köseilyas, Kayı, Eskicami, Gündoğdu, Aydoğdu, Zafer, Yağcı	**Kayı and Zafer:** Wheat Sunflower, Canola/Rapeseed Barley **Remaining Settlements:** TBD
Section 3 (KM 70 –105)	Tekirdağ, **Süleymanpaşa**	Seymenli, Karahisarlı, Nusratfakı, Akçahalil, Kınıklar	Wheat, Sunflower, Canola/Rapeseed
		Güveçli, İnecik	Wheat, Sunflower
	Tekirdağ, **Malkara**	Yenice, Hereke	Wheat, Sunflower, Canola/Rapeseed
		Ahievran	Melon, Watermelon, Wheat, Sunflower, Onion, Fodder crops

Source: Key-informant Interviews, November 2025 and March 2026.

5.2.3.3.3. Livestock Activities

According to key-informant interviews, livestock farming is a livelihood source of varying significance across the affected settlements.

In Section 1, no settlement rates it as very important. It is absent in Semizkumlar and Sancaktepe settlements of Silivri. Silivri District Directorate of Agriculture and Forestry reported (December 2025) that there is a pasture shortage across the district; the capacity of existing pastures is insufficient and livestock activities are predominantly small ruminant farming, although cattle farming is also carried out in certain areas.

In Section 2, livestock activity shows a clear contrast between the two settlements. In Kayı, livestock was rated as very important (score 1), indicating that it constitutes a key livelihood source. In contrast, in Zafer, livestock was scored as 5, suggesting that it is absent or not considered an important activity. This highlights a divergence in livelihood structures, with Kayı maintaining a mixed farming system, while Zafer is more oriented towards non-livestock income sources.

Section 3 presents the stronger livestock activity across the corridor, with all settlements engaged in the activity at different importance levels. In Süleymanpaşa, Güveçli and in Malkara, Hereke stand out as the only settlements across all three sections to rate livestock as very important (score 1).

Table 5-13. Importance of Livestock Activities as a Livelihood Sources per Neighbourhood

Section	Province, District	Significance of Livestock as a Livelihood Activity	Neighborhood
Section 1 (KM 0 – 35)	İstanbul, **Silivri**	**1 = very important**	**--**
		2 = important	Yolçatı
		3 = moderate	Alipaşa, Çeltik, Değirmenköy, Gümüşyaka
		4 = negligible	Balaban
		5 = absent	Semizkumlar, Sancaktepe
	Tekirdağ, **Marmaraereğlisi**	**1 = very important**	**--**
		2 = important	Yakuplu, Türkmenli
		3 = moderate	Sultanköy, Cedit Ali Paşa, Çeşmeli
		4 = negligible	--
		5 = absent	--
	Tekirdağ, **Çorlu**	**1 = very important**	**--**
		2 = important	Şahpaz, Türkgücü
		3 = moderate	Seymen
		4 = negligible	--
		5 = absent	--
Section 2 (KM 35–70)	Tekirdağ, **Çorlu**	TBD	Yenice, Maksutlu
	Tekirdağ, **Süleymanpaşa**	**1 = very important**	**Kayı**
		2 = important	--
		3 = moderate	--
		4 = negligible	--
		5 = absent	Zafer
		TBD	Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı
Section 3 (KM 70 –105)	Tekirdağ, **Süleymanpaşa**	**1 = very important**	**Güveçli**
		2 = important	Karahisarlı, Nusratfakı, İnecik, Akçahalil, Kınıklar
		3 = moderate	Seymenli
		4 = negligible	--
		5 = absent	--

Section	Province, District	Significance of Livestock as a Livelihood Activity	Neighborhood
	Tekirdağ, **Malkara**	**1 = very important**	**Hereke**
		2 = important	Yenice, Ahievran
		3 = moderate	--
		4 = negligible	--
		5 = absent	--

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

Livestock ownership across the affected settlements corridor reflects the pattern of activity significance observed in Table 5-14, with considerable variation in both the number of households engaged and herd sizes between settlements. It should be noted that not all settlement heads reported the number of households and their herd sizes.

Based on the data, bovines are more prominent across the corridor. In almost every settlement that reported figures, the number of households keeping bovines equals or exceeds those keeping ovines, and bovines are reported alone in several settlements (Cedit Ali Paşa, Karahisarlı).

However, when it comes to herd size, ovines dominate significantly – Türkgücü reports 4,000 ovines vs 500 bovines, Şahpaz 3,000 ovines vs 1,000 bovines, and İnecik 1,000 ovines vs 350 bovines. This suggests that while more households keep cattle, those who keep sheep/goat tend to do so in much larger numbers, pointing to a more commercially scaled ovine sector in certain settlements, particularly in Çorlu and parts of Süleymanpaşa.

Table 5-14. Livestock Ownership and Household Engagement by Neighbourhood

Section	Province, District	Neighbourhood	Significance of Livestock Activity	Households Engaged & Livestock Count
Section 1 (KM 0–35)	**İstanbul, Silivri**	Yolçatı	2 = important	--
		Alipaşa	3 = moderate	--
		Çeltik	3 = moderate	5 HH (125 bovines); 5 HH (300 ovines)
		Değirmenköy	3 = moderate	--
		Gümüşyaka	3 = moderate	--
		Balaban	4 = negligible	--
		Semizkumlar	5 = absent	--
		Sancaktepe	5 = absent	--
	Tekirdağ, Marmaraereğlisi	Yakuplu	2 = important	30 HH (800 bovines); 20 HH (700 ovines)
		Türkmenli	2 = important	5 HH (300 bovines); 3 HH (100 ovines)
		Sultanköy	3 = moderate	8 HH (250 bovines); 2 HH (300 ovines)
		Cedit Ali Paşa	3 = moderate	2 HH (60 bovines)
		Çeşmeli	3 = moderate	2 HH (100 bovines); 10 HH (1000 ovines)
	Tekirdağ, Çorlu	Şahpaz	2 = important	15 HH (1,000 bovines); 15 HH (3,000 ovines)
		Türkgücü	2 = important	10 HH (500 bovines); 3 HH (4,000 ovines)
		Seymen	3 = moderate	3 HH (200 bovines); 2 HH (500 ovines)

Section	Province, District	Neighbourhood	Significance of Livestock Activity	Households Engaged & Livestock Count
Section 2 (KM 35–70)	**Tekirdağ, Çorlu**	Yenice, Maksutlu	**TBD**	**TBD**
	Tekirdağ, Süleymanpaşa	Kayı	1 = very important	19 HH (600 bovines); 8 HH (800 ovines)
		Zafer	5 = absent	--
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Kayı, Gündoğdu, Aydoğdu, Yağcı	**TBD**	**TBD**
Section 3 (KM 70–105)	**Tekirdağ, Süleymanpaşa**	Güveçli	1 = very important	3 HH (60 bovines); 1 HH (130 ovines)
		Karahisarlı	2 = important	--
		Nusratfakı	2 = important	2 HH (20 bovines); 1 HH (100 ovines)
		İnecik	2 = important	14 HH (350 bovines); 5 HH (1,000 ovines)
		Akçahalil	2 = important	17 HH (200 bovines); 4 HH (250 ovines)
		Kınıklar	2 = important	–
		Seymenli	3 = moderate	10 HH (400 bovines); 8 HH (600 ovines)
	Tekirdağ, Malkara	Hereke	1 = very important	35 HH (1,000 bovines); 6 HH (1,500 ovines)
		Yenice	2 = important	–
		Ahievren	2 = important	–

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.3.4. Employment in Industry

As presented in Table 5-15, according to the key-informant interviews, industrial labour is not a significant livelihood source across the majority of the affected settlements, rated as absent (score 5) in all Section 3 settlements and in most Section 1 settlements. The exceptions are concentrated in Silivri, where Sancaktepe and Balaban rate it as very important (score 1), with Sancaktepe notably reporting approximately 100 factories in the neighbourhood providing employment to many households, in addition to industrial facilities in nearby Çerkezköy.

In Section 2, Zafer rates industrial labour as important (score 2), while Kayı rates it as absent. The concentration of industrial employment in the western end of the corridor – particularly around Sancaktepe and Balaban – reflects the proximity of these settlements to the organised industrial zones of the Istanbul-Çerkezköy axis and represents a livelihood dimension distinct from the predominantly agricultural character of the rest of the Project corridor. Section 2 data for the remaining settlements are pending field surveys.

Table 5-15. Importance of Industrial Labour as a Livelihood Source per Neighbourhood

Section	Province, District	Neighbourhood	Significance of Livestock Activity	Households Engaged & Livestock Count
Section 1 (KM 0–35)	İstanbul, Silivri	Sancaktepe	1 = very important	~100 factories in the neighbourhood; many households employed locally and in Çerkezköy
		Balaban	1 = very important	Households employed in factories
		Çeltik	2 = important	~100 persons employed
		Semizkumlar	2 = important	--
		Değirmenköy	2 = important	--
	Tekirdağ, Marmaraereğlisi	Cedit Ali Paşa	3 = moderate	~200 persons employed
	Tekirdağ, Çorlu	Seymen	4 = negligible	~30 persons employed in factories
Section 2 (KM 35–70)	Tekirdağ, Çorlu	Yenice, Maksutlu	TBD	TBD
	Tekirdağ, Süleymanpaşa	Zafer	2 = important	--
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı	TBD	TBD
Section 3 (KM 70-105)	Tekirdağ, Süleymanpaşa		None	None
	Tekirdağ, Malkara		None	None

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.3.5. Government Employment

Table 5-16 presents the settlements where government employment constitutes a measurable livelihood source. According to the key-informant interviews, government employment is largely absent as a livelihood source across the affected settlements, with the overwhelming majority of settlements in all three sections rating it as absent or negligible. The only meaningful exceptions are Zafer in Section 2, which stands out as a clear outlier due to the presence of military lodgings housing approximately 2,000 residents, where public sector and military employment constitute a significant livelihood source, and Cedit Ali Paşa in Section 1, where around 50 people are employed in the public sector. Ahievren in Section 3 also records a moderate rating. Section 2 data for the remaining settlements are pending field surveys.

Table 5-16. Importance of Government Employment as a Livelihood Source per Neighbourhood

Section	Province, District	Neighbourhood	Significance of Government Employment	Notes
Section 1 (KM 0–35)	Tekirdağ, Marmaraereğlisi	Cedit Ali Paşa	3 = moderate	50 people employed in public sector
Section 2 (KM 35–70)	Tekirdağ, Çorlu	Yenice, Maksutlu	TBD	TBD
	Tekirdağ, Süleymanpaşa	Zafer	2 = important	Military lodgings; approx. 2,000 residents
		Kayı	4 = negligible	--

Section	Province, District	Neighbourhood	Significance of Government Employment	Notes
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı	TBD	TBD
Section 3 (KM 70–105)	Tekirdağ, Süleymanpaşa	Ahievren	3 = moderate	--

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.3.6. Trade

Trade is not a significant livelihood source across the majority of the project corridor, rated as absent (score 5) in most Section 1 settlements, particularly across Silivri and Çorlu, and in the majority of Section 3 settlements. Therefore, Table 5-17 presents the settlements where trade constitutes a measurable livelihood source.

In Section 1, the most notable exceptionsare Gümüşyaka and Cedit Ali Paşa, where trade was rated as very important (score 1) and important (score 2), respectively. In Section 3, Nusratfakı is the only settlement that rates trade as important (score 2) with a petrol station, restaurant, and brick factory providing employment opportunities; İnecik and Kınıklar rate it as moderate (score 3), with small businesses including coffee houses, groceries, and roadside vegetable selling; and Ahievran similarly rates it as moderate, with roadside shop operators noted. Where trade activity exists across the corridor, it predominantly takes the form of small-scale rural service businesses serving local communities rather than commercially significant enterprises. Section 2 data for the remaining settlements are pending field surveys.

Table 5-17. Importance of Trade as a Livelihood Source per Neighbourhood

Section	Province, District	Neighbourhood	Significance of Trade Activity	Notes
Section 1 (KM 0-35)	Istanbul, Silivri	Gumüsyaka	1 = very important	Young people engaged in trade/labour
	Tekirdag, Marmaraereglisi	Cedit Ali Pasa	2 = important	Approx. 300 commercial businesses/shops
	Tekirdag, Marmaraereglisi	Sultanköy	4 = negligible	--
Section 2 (KM 35-70)	Tekirdag, Corlu	Yenice, Maksutlu	TBD	TBD
	Tekirdağ, Süleymanpaşa	Zafer	4 = negligible	--
		Karaevli, Husunlu, Gazioglu, Köseilyas, Gündogdu, Aydogdu, Yagci	TBD	TBD
Section 3 (KM 70-105)	Tekirdag, Süleymanpasa	Nusratfaki	2 = important	Petrol station, restaurant and brick factory workers
	Tekirdag, Süleymanpasa	Inecik	3 = moderate	17 HH livestock businesses, 2 restaurants, 2 groceries, 3 coffee houses
	Tekirdag, Süleymanpasa	Kiniklar	3 = moderate	15 HH selling vegetables at village entrance
	Tekirdag, Malkara	Ahievran	3 = moderate	Roadside shop operators
	Tekirdag, Malkara	Yenice	4 = negligible	Grocery, coffee house, repair shop

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.3.7. Pensions

According to the key-informant interviews, retirement income is the most consistently present supplementary livelihood source across the affected settlements, rated as at least moderate (score 3) in virtually all settlements in both Section 1 and Section 3, with only Güveçli rating it as absent and Alipaşa and Yolçatı rating it as negligible, as presented in Table 5-18.

In Section 1, Semizkumlar stands out as the only settlement where retirement income is rated as very important (score 1).

In Section 2, both Kayı and Zafer rate retirement income as moderate, with Kayı noting that approximately half of its households are pensioners. Section 2 data for the remaining settlements are pending field surveys.

In Section 3, Ahievran rates retirement income as very important (score 1) with approximately 50% of households depending on pension payments. The remaining Section 3 settlements consistently rate it as moderate, with pensioner numbers ranging from 30 in Karahisarlı and Nusratfakı to 100 in İnecik.

The widespread prevalence of retirement income across the corridor reflects the ageing demographic profile of these predominantly rural settlements and underscores its importance as a stable, non-land-based income stream that will not be directly disrupted by land acquisition.

Table 5-18. Importance of Retirement Income as a Livelihood Source per Neighbourhood

Section	Province, District	Neighbourhood	Significance of Retirement Income	Notes
Section 1 (KM 0-35)	Istanbul, Silivri	Semizkumlar	1 = very important	--
		Celtik	2 = important	100 pensioners
		Balaban	2 = important	--
		Degirmenköy	3 = moderate	--
		Gümüsyaka	3 = moderate	--
		Alipasa, Yolça	4 = negligible	--
		Yolcati	4 = negligible	--
	Tekirdag, Marmaraereglisi	Yakuplu	2 = important	Approx. 70% of households are pensioners
		Cesmeli	2 = important	170 pensioners
		Sultanköy	3 = moderate	900 pensioners
		Cedit Ali Pasa	3 = moderate	200 pensioners
		Türkmenli	3 = moderate	200 pensioners
	Tekirdag, Corlu	Türkgücü	2 = important	220 pensioners
		Seymen	3 = moderate	180 pensioners
		Sahpaz	3 = moderate	70 pensioners
Section 2 (KM 35-70)	Tekirdag, Corlu	Yenice, Maksutlu	TBD	TBD
	Tekirdag, Süleymanpasa	Kayı	3 = moderate	Approx. half of households are pensioners
		Zafer	3 = moderate	--
		Karaevli, Husunlu, Gazioglu, Köseilyas, Gündogdu, Aydogdu, Yagci	TBD	TBD
Section 3 (KM 70-105)	Tekirdag, Süleymanpasa	Ahievren	1 = very important	Approx. 50% of households are pensioners
		Seymenli	2 = important	250 pensioners
		Karahisarli	3 = moderate	30 pensioners
		Nusratfaki	3 = moderate	30 pensioners

Section	Province, District	Neighbourhood	Significance of Retirement Income	Notes
		Inecik	3 = moderate	100 pensioners
		Akcahalil	3 = moderate	45 pensioners
		Kiniklar	3 = moderate	40 pensioners
		Güvecli	5 = absent	--
	Tekirdag, Malkara	Yenice	3 = moderate	50 pensioners
		Hereke	3 = moderate	80 pensioners

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.3.8. Beekeeping Activities

Beekeeping is a widespread supplementary livelihood activity across the affected settlements, recorded in the majority of surveyed settlements in both Section 1 and Section 3.

Hive counts and household engagement vary considerably between settlements: in Section 1, the most active beekeeping communities are found in Seymen with 5 households managing 500 hives. In Section 3, Hereke stands out as the most beekeeping-intensive settlement across the entire corridor, with 10 households managing 700 hives, while Karahisarlı records 8 households with 300 hives.

Mobile (itinerant) beekeeping– where beekeepers seasonally move their hives to different locations – is confirmed in five settlements: Güveçli and Hereke in Section 3, and Sultanköy, Seymen, and Şahpaz in Section1.

Muhtars of six settlements reported to the RAP field survey team that there may be potential for impact on beekeepers due to the Project– Çeltik, Türkgücü, Kayı, Kınıklar, Hereke, and Ahievren – of which Hereke, Ahievren, Kayı, and Türkgücü report no suitable alternative site available. This potential will be further assessed by the Project's technical and social teams during ongoing consultations to be held by Project representatives.

Table 5-19. Beekeeping Activity, Hive Counts and Impact Potential by Neighbourhood

Section	Province, District	Neighbour hood	# of House holds	# of Hives	Mobile Bee keeping	Impact Potential on Beekeepers
Section 1 (KM 0-35)	Istanbul, Silivri	Alipaşa	3	60	No	No
	Istanbul, Silivri	Çeltik	10	200	No	Yes (4 HH – can relocate to nearby forests)
	Istanbul, Silivri	Yolçatı	1	40	No	No
	Istanbul, Silivri	Balaban	5	50	No	–
	Istanbul, Silivri	Gümüşyaka	2	100	No	No
	Tekirdağ, Marmaraereğlisi	Sultanköy	3	30	Yes	No
	Tekirdağ, Marmaraereğlisi	Cedit Ali Paşa	3	100	No	–
	Tekirdağ, Marmaraereğlisi	Yakuplu	10	200	No	No
	Tekirdağ, Marmaraereğlisi	Türkmenli	1	150	No	No
	Tekirdağ, Marmaraereğlisi	Çeşmeli	1	15	No	No
	Tekirdağ, Çorlu	Seymen	5	500	Yes	No
	Tekirdağ, Çorlu	Şahpaz	2	60	Yes	No
	Tekirdağ, Çorlu	Türkgücü	5	150	No	Yes

Section	Province, District	Neighbour hood	# of House holds	# of Hives	Mobile Bee keeping	Impact Potential on Beekeepers
						(No alternative known by Mukhtar, individual has no other location)
Section 2 (KM 35-70)	Tekirdağ, Çorlu	Yenice, Maksutlu	TBD	TBD	TBD	TBD
	Tekirdağ, Süleymanpaşa	Kayı	6	240	No	**Yes** (No alternative known by Mukhtar, individual has no other location)
	Tekirdağ, Süleymanpaşa	Karaevli, Husunlu, Gazioglu, Köseilyas, Gündogdu, Aydogdu, Yagci	TBD	TBD	TBD	TBD
Section 3 (KM 70-105)	Tekirdağ, Süleymanpaşa	Karahisarlı	8	300	No	No
	Tekirdağ, Süleymanpaşa	Güveçli	4	100	**Yes**	No
	Tekirdağ, Süleymanpaşa	Seymenli	3	70	No	No
	Tekirdağ, Süleymanpaşa	Kınıklar	3	50	No	**Yes** Can relocate to other owned plots per Mukhtar
	Tekirdağ, Malkara	Hereke	10	700	**Yes**	**Yes** (No alternative known by Mukhtar, individual has no other location)
	Tekirdağ, Malkara	Ahievren	2	90	No	**Yes** (No alternative known by Mukhtar, individual has no other location)
	Tekirdağ, Malkara	Yenice	2	30	No	No

Source: Key-informant Interviews, November 2025 and March 2026.

5.2.3.3.9. Forestry Activities

According to the key-informant interviews, forestry is similarly entirely absent as a livelihood source across all surveyed settlements.

Although forestry is not recorded as a formal livelihood source, several settlements in Section 3 (including Süleymanpaşa Seymenli, Karahisarlı, İnecik, Akçahalil and Kınıklar in Süleymanpaşa) reported collecting non-timber forest products from nearby forested areas, including mushrooms, linden blossom, cornelian cherry, stone pine, and firewood, as well as using forested land for green fodder and livestock grazing.

In b and **Akçahalil**, the mukhtars reported that forest access may be severed by the Project and that forest-based livelihoods such as collection of non-timber forest products may be affected. Please see Table 3-7 for the list of settlements with affected forest parcels within the Motorway's expropriation corridor. Seymenli loses approximately 303.4 decares of forest land, while the remaining area of the affected parcels exceeds 13,000 decares. Similarly, Akçahalil loses approximately 250 decares of forest land, with the remaining area of the affected forest parcels exceeding 6,000 decares.

The **Kınıklar** mukhtar reported that households collecting non-timber forest products from the forests may be affected, although he does not anticipate that access will be severed. Kınıklar loses approximately 95 decares of forest lands, with the remaining area of the affected forest parcels exceeding 1,000 decares.

The potential for impacts on the users of forests will be further assessed by the Project's technical and social teams during ongoing consultations to be held by Project representatives.

5.2.3.3.10. Tourism

According to the key-informant interviews, tourism is entirely absent as a livelihood source across the affected settlements, rated as absent (score 5) in virtually all surveyed settlements in Sections 1 and 3.

The single exception is Gümüşyaka in Silivri, which rates tourism as moderate (score 3), with the note indicating that young people from the settlement work in restaurants – likely linked to the coastal and recreational facilities in the wider Silivri district rather than tourism activity within the settlement itself.

In Section 2, Kayı and Zafer rate tourism as absent, while the remaining Section 2 settlements have yet to be surveyed.

Overall, tourism does not constitute a livelihood dimension of any significance for the affected communities along the Motorway corridor.

5.2.3.3.11. Fishing Activities

According to the key-informant interviews, fishing is entirely absent as a livelihood source across all surveyed settlements, indicating that it does not constitute a livelihood activity for households or contribute to local economic dynamics.

5.2.3.4. Grazing Areas

The affected registered pasture parcels have been identified based on the expropriation plans and are presented in Section 3.1.1.1. During the mukhtar surveys, the availability of alternative pasture lands and farmlands used for grazing was identified in the affected settlements, as summarised in Table 3-19.

The mukhtar surveys revealed that pasture and grazing land use across the affected settlements reflects a dual system of registered communal pasture parcels and informal grazing on fallow or harvested farmland, with the relative importance of each varying between sections. A subset of the mukhtars reported that agricultural lands are used for grazing in certain settlements, showing that grazing practices rely not only on formally designated pasture lands but also, in some cases, on agricultural fields.

Pasture land impacts are concentrated in Section 3 Süleymanpaşa settlements, particularly Seymenli and Güveçli. Responses indicate that in many settlements where pasture areas are affected, alternative grazing options are available. Some mukhtars stated that remaining portions of pastureland will continue to be used, while others noted the availability of alternative pasture areas or the possibility of grazing in forest clearings or other open lands.

Table 5-20. Pastures and Grazing Areas in Affected Settlements

Section	Province, District	Neighbourhood	Registered Pasture Parcels Affected by the Project according to Exp. Plans (see Section)	Alternative Pasture and Grazing Lands available in the Settlement
Section 1 (KM 0-35)	Tekirdag, Corlu	Seymen	Registered pastures 53/1 (6 decare out of 60 decare affected) and 54/3 (3.5 da out of 170 da affected)	Farmland used for grazing
	Tekirdağ, Marmaraereğlisi	Çeşmeli	Registered pasture lands 185/37 (34 da out of 355 da affected) and 188/76 (51 da out of 657 da affected)	Farmland used for grazing
Section 2 (KM 35-70)	Tekirdag, Corlu	Yenice, Maksutlu	TBD	TBD
	Tekirdag, Süleymanpasa	Kayı	0/1111 (0.6 da out of 1 da affected)	Registered pasture parcels: 108/4, 105/2, 107/10, 0/1442, 0/1438; used all year except cold winters; fertilised and treated

Section	Province, District	Neighbourhood	Registered Pasture Parcels Affected by the Project according to Exp. Plans (see Section)	Alternative Pasture and Grazing Lands available in the Settlement
		Yagci	0/41 (12 out of 49 da affected) 0/101 (32 out of 244 da affected)	TBD
Section 3 (KM 70-105)	Tekirdag, Süleymanpasa	Seymenli	107/74 (50 da out of 191 da affected) 107/77 (85 da out of 126 da affected)	Registered pasture parcels 3/139 (137 da) and 113/95 (2 da) + all vacant farmland used for grazing
	Tekirdag, Süleymanpasa	Güveçli	Parcel 109/34 (23 da out of 62 da affected)	All vacant farmland used for grazing
	Tekirdag, Süleymanpasa	Nusratfaki	107/26 (15 da out of 50 da affected), 119/2 (2 da out of 9 da affected)	All vacant farmland used for grazing
	Tekirdag, Süleymanpasa	Inecik	161/7 (8 da out of 30 da affected)	Registered pasture parcels: 156/84-85 (166 da) + All vacant farmland used for grazing

Source: Key-informant Interviews, November 2025 and March 2026.

5.2.3.5. Unemployment

According to the key-informant interviews, unemployment is reported as present in all Section 3 settlements, with the sole exception of Güveçli, which did not report unemployment as a problem, as presented in Table 5-21.

In Section 1, unemployment is largely absent, with only Yolçatı in Silivri, Sultanköy in Marmaraereğlisi, and Çeşmeli reporting its presence. In Section 2, Zafer reports unemployment while Kayı does not. Section 2 data for the remaining settlements are pending field surveys.

Table 5-21. Presence of Unemployment Problem by Neighbourhood

Section	Province, District	Neighbourhood	Unemployment Present
Section 1 (KM 0-35)	Istanbul, Silivri	Yolçatı	Yes
	Tekirdağ, Marmaraereğlisi	Sultanköy	Yes
		Çeşmeli	Yes
Section 2 (KM 35-70)	Tekirdağ, Çorlu	Yenice, Maksutlu	TBD
	Tekirdağ, Süleymanpaşa	Zafer	Yes
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı	TBD
Section 3 (KM 70-105)	Tekirdağ, Süleymanpaşa	Seymenli	Yes
		Karahisarlı	Yes
		Nusratfakı	Yes
		İnecik	Yes
		Akçahalil	Yes
		Kınıklar	Yes
	Tekirdağ, Malkara	Yenice	Yes
		Hereke	Yes
		Ahievren	Yes

Source: Key-informant Interviews, November 2025 and March 2026.

Qualitative responses from key informant interviews with mukhtars indicate that unemployment in the affected settlements primarily affects young people. In the majority of cases where unemployment was reported, mukhtars identified youth as the most impacted group, reflecting limited local employment opportunities for younger populations. Interviews further suggest that unemployed individuals often seek work either within their own neighbourhoods, in neighbouring settlements, or elsewhere within the same district or province. Several respondents noted that there are no salaried employment opportunities available locally, which contributes to job-seeking outside the immediate community. In a smaller number of cases, unemployment was also reported among middle-aged individuals, with some respondents referring to people around the age of 50 being affected.

5.2.3.6. Temporary Population

The key-informant interviews presented in Table 5-22 reveal a significant temporary population presence in Section 1, particularly across the coastal Silivri settlements, where summer residents and holiday-makers constitute a substantial seasonal influx. In contrast, Section 3 settlements report very limited temporary population movement. In Section 2, Kayı and Zafer report temporary populations of approximately 300 and 1,000 persons respectively, though no seasonal or occupational detail was provided. Section 2 data for the remaining settlements are pending field surveys.

The table include only settlements reporting temporary population.

Table 5-22. Temporary Population by Neighbourhood

Section	Province, District	Neighbourhood	Temp. HH	Temp. Persons	Season/ Period	Reason for Temporary In-migration	General Accommodation Means
Section 1 (KM 0-35)	Istanbul, Silivri	Semizkumlar	3,500	60,000	Summer months	Holiday-makers	Rented houses or own summer residences
		Sancaktepe	10,000	50,000	Summer months	Holiday-makers	Houses and container homes
		Gümüşyaka	5,000	20,000	Summer months	Holiday-makers; retirees	Own summer residences
		Yolçatı	30	100	Weekends & summers	Summer residents	Own summer residences
	Istanbul, Silivri	Balaban	200	400	--	--	--
		Çeltik	50	100	--	--	--
	Tekirdağ, Marmaraereğlisi	Sultanköy	500	1,500	Summer months	Summer residents	Own summer residences
Section 2 (KM 35-70)	Tekirdağ, Çorlu	Yenice, Maksutlu	TBD	TBD	TBD	TBD	TBD
	Tekirdağ, Süleymanpaşa	Kayı	100	300	--	--	--
		Zafer	250	1,000	--	--	--
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı	TBD	TBD	TBD	TBD	TBD
Section 3 (KM 70-105)	Tekirdağ, Süleymanpaşa	Karahisarlı	20	100	--	--	--
	Tekirdağ, Malkara	Yenice	7	–	--	--	--
		Hereke	20	–	Winter months	Agriculture & livestock	Tekirdağ city centre & Malkara

Source: Key-informant Interviews, November 2025 and March 2026.
*Note: -- indicates "**not reported**".*

5.2.3.7. Refugees

The mukhtar surveys identified that, refugees (immigrants) are present in the following affected settlements:

- **Silivri**: Alipaşa, Çeltik, Sancaktepe, Balaban, Değirmenköy
- **Çorlu:** Seymen
- **Marmaraereğlisi:** Sultanköy
- **Süleymanpaşa:** Nusratfaki, Akçahalil
- **Malkara:** Hereke

The distribution provided in Table 5-23 suggests that the presence of refugees and migrants is limited and varies across the surveyed neighbourhoods. Qualitative responses from key informant interviews with mukhtars indicate the presence of small numbers of Afghan, Syrian, Turkmen, Uzbek, Kyrgyz, and Pakistani migrants in several settlements. In most cases, the reported presence consists of one to a few households rather than large or concentrated groups.

Interviews with mukhtars reveal that migrants are primarily employed in low-skilled and labour-intensive jobs, including factory work, construction, agricultural labour, animal husbandry, and shepherding. In several neighbourhoods, Afghan migrants were reported to be engaged in livestock-related activities, while Syrian migrants were more commonly employed as factory workers or construction labourers. In some cases, mukhtars noted that return movements have begun among migrant populations.

Regarding housing conditions, respondents indicated that migrants generally reside in rented houses within the neighbourhoods. The number of migrant households typically ranges from one to a few families per settlement, and in some cases, the exact number of individuals was not known by the mukhtars.

Based on the interviews, no large-scale or seasonal influx of migrant or refugee labour was identified in the affected settlements, and migrant presence remains localised and limited in scale.

Table 5-23. Presence of Refugees and Migrants by Neighbourhood

Section	Province, District	Neighbourhood	Number	Nationality & Occupation
Section 1 (KM 0-35)	Istanbul, Silivri	Alipaşa	1 HH	Shepherd (nationality unknown)
	Istanbul, Silivri	Çeltik	5 HH	Syrian nationals; factory workers
	Istanbul, Silivri	Sancaktepe	Unknown number	Syrian, Afghan, Kyrgyz and Pakistani nationals; factory workers; renting homes
	Istanbul, Silivri	Balaban	Several HH	Afghan, Syrian and Turkmen nationals; general labourers; some have returned
	Istanbul, Silivri	Değirmenköy	1 – 2 HH	Syrian, Uzbek and Turkmen nationals; construction workers
	Tekirdağ, Marmaraereğlisi	Sultanköy	Unknown number	Syrian nationals; exact count unknown
	Tekirdağ, Çorlu	Seymen	1 HH	Factory worker (nationality unknown)
Section 2 (KM 35-70)	Tekirdağ, Süleymanpaşa	Zafer	300 – 500 persons	Syrian nationals; construction workers
		Karaevli, Husunlu, Gazioğlu, Köseilyas, Gündoğdu, Aydoğdu, Yağcı	TBD	TBD
Section 3 (KM 70-105)	Tekirdağ, Süleymanpaşa	Nusratfakı	4 HH	Afghan and Turkmen nationals
	Tekirdağ, Süleymanpaşa	Akçahalil	1 HH	Turkmen national; livestock caretaker
	Tekirdağ, Malkara	Hereke	6 persons	Afghan nationals; livestock caretakers

Source: Key-informant Interviews, November 2025 and March 2026.

5.2.3.8. Project Awareness and Perception

Based on the key-informant interviews with mukhtars, the Project is broadly known among the settlement heads (mukhtars). The vast majority of the mukhtars included in the key informant surveys were aware of the Project, with only four reporting no knowledge of it – Alipaşa, Semizkumlar and Yolçatı (all in Silivri) and Sultanköy (Marmaraereğlisi). Overall, project awareness among muhtars along the corridor is high. The dominant source is KGM), either alone or in combination with the SPV or other public sources. This indicates that where awareness exists, it largely flows through formal channels.

A small fraction of mukhtars (6) cited informal sources – overheard information, word of mouth from residents, or general rumour – rather than any direct project communication.

Anticipated positive impacts are largely centred on regional traffic relief, which is consistent with the nature of a transit motorway corridor. On the other hand, heads of the affected communities demonstrated awareness of the Project and its potential implications for agricultural land and rural livelihoods. While no opposition to the Project was expressed, mukhtars raised the following concerns:

- **Land fragmentation:** The division of agricultural parcels by the Motorway alignment was the most widely cited concern, with mukhtars noting that split parcels reduce the productive use and accessibility of remaining farmland. Restricted movement of both people and livestock across the alignment was flagged as a priority, with requests for underpasses and overpasses to be provided at adequate frequency (land fragmentation is discussed under Section 3.1.3; list of overpasses and underpasses is presented under Appendix A).

- **Pasture land:** Several mukhtars (i.e. Seymenli, Çeşmeli) noted that communal grazing areas will be reduced or disrupted, affecting livestock keepers who depend on these lands (livelihood restoration and improvement measures are discussed under Chapter 8).

- **Agricultural income**: A number of mukhtars expressed concern that land loss and access restrictions would result in reduced farm income, particularly where the alignment affects productive, high-value parcels (livelihood restoration and improvement measures are discussed under Chapter 8).

- **Infrastructure and natural resources:** Isolated concerns were raised regarding potential impacts on drinking water sources and existing rural infrastructure (displacement of exiting infrastructures is addressed under Section 3.8.1).

- **Construction-phase impacts:** Dust, noise, and increased heavy vehicle traffic during the construction period were identified as concerns, though communities generally regard these as temporary inconveniences (temporary E&S impacts during construction are addressed under Section 3.6).

- **Alignment routing**: A small number of mukhtars expressed a preference for an alternative route that would minimise the loss of productive agricultural land (avoidance and minimisation measures implemented by the Project are discussed under Section 2.8).

5.2.4. Physically Displaced Households

The baseline information presented below is derived from the RAP surveys carried out by the RAP Consultant Team during Campaign 1 and Campaign 2 were completed in February and March 2026.The physically displaced questionnaires were completed with affected households in Section 1 and Section 2 (KM 58–60, Kayı and Zafer neighbourhoods), as no physically displaced households were identified in Section 3 or in the remaining neighbourhoods of Section 2 (KM 35–70, excluding KM 58–60).

As previously presented in Section 3.3 and summarised in Table 5-25; the total number of residential structures to be relocated by the Project is 43, including both permanent and temporary (seasonal/occasional) residences across Section 1 (24 houses) and Section 2 (19 houses). In addition to these 43 houses, there are 5 vacant residential structures, which will not be subject to physical displacement. As summarised in 5.1.2, interviews were completed with 12 households (6 in Section 1 and 6 in Section 2). As there are no affected houses in Section 3, no interview with physically displacement households was conducted in this section. Accordingly, in this section, the survey findings are presented for 12 physically displacement households who were surveyed as part of RAP field studies.

5.2.4.1. Number of Affected Persons and Average Household Size

Table 5-24 presents the distribution of household sizes within the sample population.

The most common household size is 3 members, followed by households with 2 members. Households with 4 members are also represented in the sample. The average household size across all surveyed households is 2.42 individuals, with Section 1 averaging 2.70 and Section 2 averaging 2.17.

The overall findings suggest that the affected residential units are predominantly composed of small-sized households, with a strong presence of 2–3 person households. This pattern is consistent with the high proportion of seasonal usage observed in the project area, where dwellings are typically used for temporary or intermittent habitation rather than permanent residence.

Furthermore, the relatively low number of interviewed households compared to the total affected units should be considered when interpreting the results. The presence of vacant units and seasonally occupied residences has limited the accessibility of respondents, thereby constraining the representativeness of the sample.

Table 5-24. Household Size Distribution of the Sample Population

Section	Household Size	Number of Households
Section 1 (KM 0-35)	**1**	**1**
	2	**1**
	3	**3**
	4	**1**
	Total	**6**
	Total number of Individual	**16**
	Average Household Size	**2,70**
Section 2 (KM 35-70)	**1**	**1**
	2	**3**
	3	**2**
	Total	**6**
	Total number of Individual	**13**
	Average Household Size	**2,17**
Section 3 (KM 70-105)	**--**	**--**
All Sections	**Total**	**12**
	Total number of Individual	**29**
	Average Household Size	**2,42**

Source: RAP Field Surveys (February – March 2026).

As previously presented in Section 3.3 and summarised below in Table 5-25; the total number of residential structures to be affected by the Project is 48. This includes both permanent and temporary (seasonal) residences across Section 1 (24 houses) and Section 2 (19 houses), plus the 5 vacant structures that will not be subject to physical displacement.

The total number of households residing in these **48** affected residential structures is **43 (i.e. 5 structures are vacant).**

- During the RAP field studies, surveys were completed with 6 households in Section 1, where residential structures are predominantly used on a seasonal basis. In Section 2, surveys were completed with 6 households in Zafer neighbourhood, of which 5 households reside in 4 permanent structures and 1 household is in a seasonal residence. For the remaining Section 2 settlements, field surveys are yet to be conducted.

- As given in Table 5-24, the **average households size of the physically displaced households** within the RAP survey sample is **2.42.**

- **Accordingly, the total number of persons to be physically displaced from these 43 households is 104.**

Table 5-25. Number of Persons (Individuals) to be Physically Displaced

Number of Affected Residential Structures			Number of Households Residing in Affected Residential Structures (based on expropriation plans)		Average Household Size (based on RAP Field Surveys of February-March 2026)	Total Number of Persons (Individuals) to be Physically Displaced
Permanent	Temporary	Total to be Relocated	Permanent	Temporary		
4	39	43	5	38	2.42	104

Source: SPV, Expropriation Plans (March 2026) and Structure Valuation Forms (May 2026); RAP Field Surveys (February – March 2026).

5.2.4.2. Respondents' Profile

Table 5-26 provides a breakdown of the gender distribution among the respondents in the sample. Male respondents are more strongly represented in the sample, although female participation also constitutes a considerable share.

Table 5-26. Gender of Respondents

Section	Gender	Number of Responses (Household)
Section 1 (KM 0-35)	**Male**	4
	Female	2
Section 2 (KM 35-70)	**Male**	4
	Female	2
Section 3 (KM 70-105)	**Male**	--
	Female	--
	Total	**12**

Source: RAP Field Surveys (February – March 2026).

Table 5-27 provides an overview of the education levels among the respondents. The majority of respondents completed primary school, followed by secondary school graduates. A small number hold a university degree or reported no formal education. No respondents reported completing high school. Overall, the findings indicate that the education level among respondents is predominantly at the primary school level.

Table 5-27. Education Levels among Respondents

Section	Education Level	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Primary school**	2	16.7
	Secondary school	2	16.7
	High-school	0	0
	University	1	8.3
	No education	1	8.3
	No response	1	8.3
Section 2 (KM 35-70)	**Primary school**	4	33.3
	Secondary school	1	8.3
	High-school	0	0
	University	0	0
	No education	0	0
	No response	0	0
Section 3 (KM 70-105)	--	--	--
Total		**12**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.4.3. Land Tenure and Ownership

Table 5-28 presents the ownership or tenancy status of the land on which the affected houses are located. Among the 12 households, the majority are owners of private land. A notable proportion of households in Section 2 are formal users of private land without rental payment, while one household in Section 1 is a formal renter of private land. No households reported being informal users of either public or private land. Overall, the findings indicate that land use is predominantly based on formal ownership and formal use arrangements.

Table 5-28. Land Ownership or Tenancy Status of Households using the Affected House

Section	Ownership of the Parcel Containing the Affected House	Number of Responses (Household)
Section 1 (KM 0-35)	**Owner of the private land** (in full or through partial/shared ownership)	5
	Informal user of public land	0
	Informal user of private land	0
	Formal renter of private land	1
	Formal user of private land, with no rental payment	0
Section 2 (KM 35-70)	**Owner of the private land** (in full or through partial/shared ownership)	2
	Informal user of public land	0
	Informal user of private land	0
	Formal renter of private land	0
	Formal user of private land, with no rental payment	4
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.4. Structure Tenure and Ownership

Table 5-29 shows the ownership or tenancy status of the households residing in the affected houses. A significant portion of the households, 40.8%, are full owners of their homes, holding the full title deed, while others, 26.5%, have partial ownership through co-ownership of the house. Many households, 18.4%, occupy informal houses on public land without any official permit or documentation. There are households that are formal renters, 6.6%, or formal users of the house without making any rental payments, 6.6%. A small group of households (1.0%) is currently involved in an ongoing lawsuit regarding ownership of their homes.

In the affected households, the majority of co-owners of the structures are close relatives, thus property ownership is often shared within families.

In cases where the property is co-owned, 12 households reported that the other co-owners do not confirm or accept the ownership of the property. This indicates potential disagreements or disputes regarding the ownership rights, which may result in the actual users of the property not receiving the cash compensation to be paid by KGM in line with the Expropriation Law.

Table 5-29. Structure Ownership or Tenancy Status of Households using the Affected House

Section	Ownership of the Parcel Containing the Affected House	Number of Responses (Household)
Section 1 (KM 0-35)	**Owner of the house,** holding full title deed	5
	Co-owner of the house, holding partial shares of the titled deed	0
	Owner of the house on public land (informal house)	0
	Formal user of the house, with no rental payment	0
	Formal renter of the house	1
Section 2 (KM 35-70)	**Owner of the house,** holding full title deed	2
	Co-owner of the house, holding partial shares of the titled deed	0
	Owner of the house on public land (informal house)	1
	Formal user of the house, with no rental payment	3
	Formal renter of the house	0
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.5. Inheritance and Succession Status

Table 5-30 presents the method through which the affected parcels were acquired. The large majority of the households acquired their parcels through other means, such as purchase, while only one household in Section 1 acquired the parcel through inheritance. Of the cases where inheritance applies, the household has the inheritance document required for legal recognition of ownership.

Table 5-30. Acquisition of the Affected Parcel through Inheritance

Section	Acquired through Inheritance?	Number of Responses (Household)	Status of Inheritance Documentation ("*Veraset Belgesi*")
Section 1 (KM 0-35)	**Yes**	1	Has inheritance document
	No	5	N/A
Section 2 (KM 35-70)	**Yes**	0	N/A
	No	6	N/A
Section 3 (KM 70-105)	--	--	
Total		**12**	

Source: RAP Field Surveys (February – March 2026).

5.2.4.6. Residence Status: Permanent or Temporary

As outlined in Table 5-31, the majority of the households reported that the affected house is for temporary or seasonal use. The temporary residence is used during weekends and holidays, in winter or summer, or seasonally during agricultural activities. Among the respondents, 5 households reported that the house is their permanent residence, all of which are located in Section 2.

Table 5-31. Residence Status

Section	Residence Status	Number of Responses (Household)
Section 1 (KM 0-35)	**Permanent**	0
	Temporary	6
	No response	0
Section 2 (KM 35-70)	**Permanent**	5
	Temporary	1
	No response	0
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.7. Ownership of Another House

As outlined in Table 5-32, 8 households reported having another house, while 4 households indicated that they do not own any other property. Among those with another house, Section 1 households are located in the same district, other districts, or other provinces, while both Section 2 households own another house in the same district.

Table 5-32. Ownership of Another House

Section	Ownership of Another House	Number of Responses (Household)	Location of Other House
Section 1 (KM 0-35)	**Yes**	6	- 2 in the same district - 3 in other district - 1 in other provinces
	No	0	--
	No response	0	--
Section 2 (KM 35-70)	**Yes**	2	2 in the same district
	No	4	--
	No response	0	--
Section 3 (KM 70-105	--	--	--
Total		**12**	--

Source: RAP Field Surveys (February – March 2026).

5.2.4.8. Income Sources

The **sources of income** for households in the affected areas include the following:

- Agriculture,
- Monthly salary,
- Rental income (such as from shops),

Retirement pension, Table 5-33 outlines the primary sources of income for the households in the affected areas. Agriculture, retirement pension and monthly salary stands as the primary source of income.

Table 5-33. Primary Sources of Income for Households

Section	Primary Source of Income	Number of Responses (Household)
Section 1 (KM 0-35)	**Agriculture**	1
	Monthly salary	1
	Retirement pension	2
	No response	2
Section 2 (KM 35-70)	**Agriculture**	1
	Monthly salary	2
	No response	3
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.9. Agricultural Activities on Affected Parcels

Agricultural activities on the parcels are predominantly non-commercial in nature. Table 5-34 shows that 5 out of 12 households use their land for open-field agriculture, while 7 households do not carry out any agricultural activity on the affected parcel. This indicates that agricultural use in the area is largely subsistence-oriented rather than market-driven.

Table 5-34. Parcels Containing House and used for Agriculture

Section	Agriculture on Affected Parcel	Number of Responses (Household)
Section 1 (KM 0-35)	**Open-field agriculture**	3
	None	3
Section 2 (KM 35-70)	**Open-field agriculture**	2
	None	4
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

The main crops cultivated on the parcels are predominantly fruit-based, including walnut, apple, pear, cherry, plum, apricot, and grapevines. In addition, limited production of vegetables such as artichoke and field crops such as wheat was reported. The diversity of fruit trees indicates that agricultural use is largely small-scale and oriented toward household consumption or supplementary use rather than intensive commercial production. Overall, crop patterns suggest a mixed but low-intensity agricultural structure.

As presented in Table 5-35, 4 of the affected households reported the presence of irrigation infrastructure on their parcels, all of which are located in Section 1. Based on the data provided, the primary source of irrigation for the affected parcels is groundwater accessed through wells.

Table 5-35. Presence of Irrigation Infrastructure on Affected Parcel

Section	Presence of Irrigation Infrastructure on Affected Parcel	Number of Responses (Household)
Section 1 (KM 0-35)	**Yes**	4
	No	0
	No response	2
Section 2 (KM 35-70)	**Yes**	0
	No	2
	No response	4
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.10. Relocation Challenges

The responses indicate that the most frequently reported concern related to relocation is the difficulty of finding new land. This issue was mentioned by 7 out of 12 respondents, highlighting it as the primary challenge.

In addition, several respondents expressed concerns regarding livelihood and income loss, reported by 2 households, as well as broader financial difficulties, including increased expenses such as rent payments. One respondent specifically noted that they would have to start paying rent despite previously using land without any cost.

Social impacts were also highlighted, with 2 respondents referring to the loss of social networks and place attachment (memory loss). Furthermore, increased distance to land and accessibility challenges were mentioned as additional concerns affecting daily routines and agricultural practices.

5.2.4.11. Relocation Expenses

The respondents identified various expenses and challenges associated with the relocation process, reflecting the complexity of the situation. Key costs include:

- **Transportation and Moving Costs:**

  Moving and relocation costs for household items, furniture, and agricultural equipment. Estimates reported by respondents range from TRY 30,000 to TRY 300,000 depending on the size of the household and property.

- **Costs related to Utility Registration:**

  Connection fees for utilities such as electricity, water, natural gas, subscriptions, and deposits at the new location.

- **Property-related Costs:**

  Land acquisition, title deed fees, and potential construction expenses if a new structure needs to be built.

- **Additional Expenses:**

  Costs associated with the relocation of functional structures such as fences and pergolas, as well as the potential termination of agricultural production due to lack of alternative land.

One respondent estimated total relocation costs at approximately TRY 600,000, including house relocation by crane, reinstallation, and reconstruction of structures. Other respondents reported varying cost levels, with estimates reaching up to TRY 1,500,000 in cases involving more complex relocation needs. One respondent indicated uncertainty regarding expected costs, highlighting a lack of information or preparedness.

As presented in Table 5-36, the vast majority of respondents rely on acquaintances and social networks to obtain information about land for sale in their neighbourhood. This highlights a strong preference for informal, community-based communication channels. The use of internet, real estate offices, or settlement heads as sources of information was not reported among the surveyed households.

Table 5-36. Sources of Information on Sales in the Neighbourhood

Section	Sources of Information on Sales in the Neighbourhood	Number of Responses (Household)
Section 1 (KM 0-35)	**Acquaintances**	4
	Internet	0
	Settlement Head (Mukhtar)	0
	Real Estate Offices	0
	Other – No opinion / No knowledge	0
	No response	2
Section 2 (KM 35-70)	**Acquaintances**	6
	Internet	0
	Settlement Head (Mukhtar)	0
	Real Estate Offices	0
	Other – No opinion / No knowledge	0
	No response	0
Section 3 (KM 70-105)	--	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

Similarly, as presented in Table 5-37, the data indicates a clear preference for purchasing property directly from the landowner, with 9 out of 12 respondents indicating this as their favoured method. In contrast, only1 respondent reported a preference for buying property through a real estate agent. This finding reinforces the earlier observation that real estate intermediaries play a minimal role in the local land market.

Table 5-37. Preferred Method for Purchasing Property

Section	Method	Number of Responses (Household)
Section 1 (KM 0-35)	**Directly from landowner**	3
	Through Real Estate Offices	1
	No response	2
Section 2 (KM 35-70)	**Directly from landowner**	6
	Through Real Estate Offices	0
	No response	0
Section 3 (KM 70-105)	**--**	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.12. Relocation Support Needs

During the RAP field surveys, affected households articulated a range of support needs specific to the relocation process. A portion of respondents stated that no specific support is required or that they could manage the process on their own, while one respondent indicated uncertainty.

The following types of support were commonly requested:

- **Access to Basic Infrastructure**
  - Provision of electricity and water connections at relocation sites was highlighted as a fundamental requirement.
- **Financial Support**
  - Financial assistance for relocation-related expenses, including transportation, land acquisition, and associated costs.
- **Land Access and Allocation**
  - Assistance in finding or accessing suitable land emerged as a key need, consistent with earlier findings on land access challenges.
- **Construction and Installation Support**
  - Support for building works and relocation of structures, including technical assistance such as crane services for relocating container housing.

The findings suggest that relocation support needs are primarily concentrated around three core areas: land access, financial assistance, and infrastructure provision.

5.2.4.13. Project Awareness

The data on Project awareness before the RAP Surveys, as given in Table 5-38 indicates that the large majority of respondents were already aware of the Motorway Project prior to participating in the survey. This suggests that the Project had already been disseminated through public or informal channels to a significant extent before formal stakeholder engagement activities began.

The responses indicate that information about the Project was obtained primarily through informal channels. Most respondents reported learning about the Project from neighbours, acquaintances, or the surrounding community. Only one respondent referred to an official information meeting, and one respondent mentioned the cooperative management as a source of information. Overall, these findings suggest that awareness of the Project has largely been shaped through community-based communication rather than direct and systematic formal disclosure. This may indicate the need for more structured and accessible stakeholder engagement activities to ensure that project-related information reaches affected persons through official channels.

Table 5-38. Awareness of the Motorway Project before RAP Surveys

Section	Response	Number of Responses (Household)
Section 1 (KM 0-35)	**Yes**	5
	No	0
	No response	1
Section 2 (KM 35-70)	**Yes**	6
	No	0
	No response	0
Section 3 (KM 70-105)	**--**	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

On the other hand, it is worthwhile to note that the majority of respondents stated they do not know the detailed route of the Motorway Project. While many have heard about the Project in general terms, there appears to be limited access to or understanding of the precise alignment.

The efforts initiated by the SPV to enhance public awareness of the affected parcels and the expropriation process – such as posting the list of affected parcels and distributing KGM's expropriation booklet – in general are detailed in Chapter 10.

Table 5-39. Awareness of the Route Details

Section	Response	Number of Responses (Household)
Section 1 (KM 0-35)	**Yes**	1
	No	4
	No response	1
Section 2 (KM 35-70)	**Yes**	0
	No	6
	No response	0
Section 3 (KM 70-105)	**Yes**	--
	No	--
	No response	--
Total		**12**

Source: RAP Field Surveys (February – March 2026).

5.2.4.14. Project Perception

The responses indicate that project perception among respondents is overwhelmingly negative, as no positive impacts were reported. All responses focused exclusively on adverse effects, particularly the anticipated loss of houses, land, and established living arrangements. Respondents emphasized the loss of assets into which they had invested significant effort and resources, including land acquired through the sale of other properties. Emotional attachment to land and place was also strongly reflected in the responses. In addition, concerns were raised regarding the disruption of family unity, deterioration of settled living patterns, and the risk of economic hardship due to loss of housing and undervaluation of affected properties. Overall, the findings suggest that the Project is perceived not only as a source of physical and economic displacement, but also as a process that may result in emotional loss, social fragmentation, and reduced household well-being.

5.2.5. Economically Displaced Households

The baseline information presented below is derived from the RAP surveys carried out by the RAP Consultant Team during Campaign 1 and Campaign 2, which was completed in May 2025. The economically displaced questionnaires were completed with a total of 274 affected households in Section 1 (173 households), Section 3 (84 households), and Section 2 (KM 58–60, Kayı and Zafer neighbourhoods – 17 households). For the remaining neighbourhoods of Section 2 (KM 35–70, excluding KM 58–60), field surveys are yet to be conducted. The survey findings presented below relate to these 274 economically displaced households.

5.2.5.1. Number of Affected Persons and Average Household Size

In Section 1, the distribution of household size indicates that the majority of households in the sample consist of 2 to 4 members. The most common household size is 2 persons (32.95%), followed by 3-person households (27.75%) and 4-person households (20.23%).

Single-person households account for 8.67% of the sample, indicating a noticeable but not dominant presence. Larger households, defined as those with 5 or more members, represent approximately 10.41% of the total, suggesting a limited presence of extended family structures.

Based on the distribution, the total population represented by the sample is 505 individuals across 173 households, resulting in an average household size of 2.92 persons per household.

Overall, the findings suggest that the prevailing household structure in this section is predominantly composed of small to medium-sized households, reflecting a typical rural household pattern with a dominance of nuclear family units.

In Section 2, the distribution of household size shows that households are generally smaller, with a strong concentration in lower household sizes. The most common household size is 2 persons (47.06%), followed by 3-person households (23.53%).

Single-person households represent 5.88% of the sample. Households with 4 members account for 11.76%, while larger households (5 or more members) make up approximately 11.76% of the total.

Based on the distribution, the total population represented by the sample is 48 individuals across 17 households, resulting in an average household size of 2.82 persons per household.

Overall, the findings suggest that households in this section tend to be smaller in size, with a stronger presence of smaller and possibly more fragmented household structures compared to other sections.

In Section 3, the distribution of household size indicates that the majority of households in the sample consist of 2 to 4 members. The most common household size is 2 persons (30.95%), followed by 3-person households (28.57%) and 4-person households (26.19%).

Single-person households are relatively limited, accounting for only 2.38% of the sample. Larger households, defined as those with 5 or more members, represent approximately 11.9% of the total.

Based on the distribution, the total population represented by the sample is 269 individuals across 84 households, resulting in an average household size of 3.20 persons per household.

Overall, the findings suggest that the prevailing household structure in the study area is based on the nuclear family model, with a limited presence of extended family households. The distribution reflects a moderate household size pattern, which is commonly observed in rural settings.

Table 5-40. Household Size Distribution of the Sample Population

Section	Household Size	Number of Households	Percentage (%)
Section 1 (KM 0-35)	**1**	**15**	8.67
	2	**57**	32.95
	3	**48**	27.75
	4	**35**	20.23
	5	**17**	9.83
	6	**-**	0.00
	7+	**1**	0.58
	Total	**173**	**100**
	Total number of Individual	**505**	**--**
	Average Household Size	**2,92**	**--**
Section 2 (KM 35-70)	**1**	**1**	5.88
	2	**8**	47.06
	3	**4**	23.53
	4	**2**	11.76
	5	**1**	5.88
	6	**1**	5.88
	7+	**-**	0.00
	Total	**17**	**100**
	Total number of Individual	**48**	**--**
	Average Household Size	**2,82**	**--**
Section 3 (KM 70-105)	**1**	**2**	2.38
	2	**26**	30.95
	3	**24**	28.57
	4	**22**	26.19
	5	**5**	5.95
	6	**5**	5.95
	7+	**-**	0.00
	Total	**84**	**100.00**
	Total number of Individual	**269**	**--**
	Average Household Size	**3,20**	**--**
All Sections	**Total**	**274**	**--**
	Total number of Individual	**822**	**--**
	Average Household Size	**3**	**--**

Source: RAP Field Surveys (February – March 2026).

5.2.5.2. **Respondents' Profile**

In Section 1, among the 173 surveyed households, the majority (168 households, or approximately 97.1%) had male respondents who were also the heads of their households, while 5 households (2.9%) were represented by female respondents. This gender distribution indicates a strong predominance of male-headed households within the Project-affected population, aligning with typical demographic patterns observed in rural and semi-rural settings in the region.

In Section 2, among the 17 surveyed households, the majority (15 households, or approximately 88.2%) had male respondents who were also the heads of their households, while 2 households (11.8%) were represented by female respondents. This distribution similarly reflects the dominance of male-headed households, although female participation is relatively higher compared to other sections.

In Section 3, among the 84 surveyed households, the majority (83 households, or approximately 98.8%) had male respondents who were also the heads of their households, while 1 household (1.2%) survey was represented by a female respondent. This gender distribution indicates a predominance of male-headed households within the Project-affected population, aligning with typical demographic patterns observed in rural and semi-rural settings in the region.

Across all sections, among the 274 surveyed households, the majority (266 households, or approximately 97.1%) had male respondents who were also the heads of their households, while 8 households (2.9%) were represented by female respondents. This overall distribution confirms the strong predominance of male-headed households within the Project-affected population, consistent with demographic patterns typical of rural and semi-rural areas.

Table 5-41. Gender of Respondents

Section	Gender	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Male**	168	97.1
	Female	5	2.9
	Total	**173**	**100**
Section 2 (KM 35-70)	**Male**	15	88.2
	Female	2	11.8
	Total	**17**	**100**
Section 3 (KM 70-105)	**Male**	83	98.8
	Female	1	1.2
	Total	**84**	**100**
All Sections	**Male**	**266**	**97.1**
	Female	**8**	**2.9**
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

Table 5-42 provides an overview of the education levels among the respondents.

In Section 1, the education level of respondents is relatively diverse, although primary school graduates constitute the largest group (41.6%). A considerable proportion of respondents have completed high school (22.5%) and university education (14.5%), indicating a relatively more balanced educational distribution compared to other sections. This suggests a moderately varied socio-educational structure within the affected population in this section.

In Section 2, the education profile is more concentrated at the lower levels, with a clear majority of respondents (58.8%) having completed primary school. Other education levels remain limited, with small proportions for secondary school (11.8%), high school (5.9%), and university (17.6%). This indicates a relatively lower overall education level and a less diversified educational structure compared to other sections.

In Section 3, primary school graduates also represent the largest group (52.4%), followed by high school graduates (22.6%) and university graduates (14.3%). Secondary school graduates account for a smaller share (10.7%). The distribution indicates a pattern similar to Section 1 but with a stronger concentration at the primary education level, suggesting moderate educational diversity.

Across all sections, the majority of respondents (46.0%) have completed primary school, indicating that the overall education level within the Project-affected population is predominantly low. High school graduates account for 21.5%, while both secondary school and university graduates each represent 14.6% of the sample. The proportion of respondents with no formal education is minimal (0.7%). Overall, the findings suggest that while some level of educational diversity exists, the general profile is characterized by a dominance of lower education levels, which may influence livelihood opportunities and adaptive capacity.

Table 5-42. Education Levels among Respondents

Section	Education Level	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Primary school**	72	41.6
	Secondary school	29	16.8
	High-school	39	22.5
	University	25	14.5
	No degree	1	0.6
	No response	7	4
	Total	**173**	**100**
Section 2 (KM 35-70)	**Primary school**	10	58.8
	Secondary school	2	11.8
	High-school	1	5.9
	University	3	17.6
	No degree	1	5.9
	No response	0	0
	Total	**17**	**100**
Section 3 (KM 70-105)	**Primary school**	44	52.4
	Secondary school	9	10.7
	High-school	19	22.6
	University	12	14.3
	No degree	0	0
	No response	0	0
	Total	**84**	**100**
All Sections	**Primary school**	126	46.0
	Secondary school	40	14.6
	High-school	59	21.5
	University	40	14.6
	No degree	2	0.7
	No response	7	2.6
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

As shown in Table 5-43, in Section 1, a high proportion of affected households – 161 out of 173 (93.0%) – reported being registered in the Farmers Registration System (ÇKS). This registration provides formal recognition of their status as farmers and grants access to agricultural subsidies, support programs, and public insurance mechanisms. In contrast, 5 households (3.0%) stated that they were not registered in the system, while 7 households (4.0%) did not provide a response.

In Section 2, a lower proportion of affected households – 10 out of 17 (58.8%) – reported being registered in the Farmers Registration System (ÇKS). In contrast, 2 households (11.8%) stated that they were not registered in the system, while a notable proportion of respondents, 5 households (29.4%), did not provide a response. This distribution suggests comparatively lower formal registration levels and higher uncertainty or lack of information regarding registration status in this section.

In Section 3, a very high proportion of affected households – 81 out of 84 (96.4%) – reported being registered in the Farmers Registration System (ÇKS). In contrast, 3 households (3.6%) stated that they were not registered in the system.

Across all sections, a very high proportion of affected households – 252 out of 274 (92.0%) – reported being registered in the Farmers Registration System (ÇKS). In contrast, 10 households (3.6%) stated that they were not registered in the system, while 12 households (4.4%) did not provide a response. Overall, the findings indicate a high level of formal integration of agricultural households into the national support system.

Table 5-43. Official Farmer Status

Section	Farmers Registration System (ÇKS) Registration Status	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Registered**	161	93.0
	Non-registered	5	3.0
	No response	7	4.0
	Total	**173**	**100**
Section 2 (KM 35-70)	**Registered**	10	58.8
	Non-registered	2	11.8
	No response	5	29.4
	Total	**17**	**100**
Section 3 (KM 70-105)	**Registered**	81	96.4
	Non-registered	3	3.6
	No response	0	0
	Total	**84**	**100**
All sections	**Registered**	252	92.0
	Non-registered	10	3.6
	No response	12	4.4
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.3. Land Tenure and Ownership

Table 5-44 presents the land ownership or tenancy status of the surveyed households.

In Section 1, among the 173 surveys, a large proportion of respondents – 79 respondents (approximately 45.7%) – reported owning the private land covered by the survey, either in full or through partial/shared ownership. An even larger share – 92 respondents (53.2%) – were identified as formal renters of private land, indicating that rental arrangements play a dominant role in land access in this section. A very small portion of respondents reported informal or alternative use types, including 1 respondent (0.5%) as an informal user of private land and 1 respondent (0.5%) as a pasture user. There were no reported cases of public land use or free-of-charge private land use.

In Section 2, among the 17 surveys, the majority of respondents – 10 respondents (58.8%) – reported owning private land. A notable portion – 4 respondents (23.5%) – were identified as informal users of private land, indicating a higher presence of non-formal land use arrangements compared to other sections. In addition, 3 respondents (17.6%) reported being formal renters of private land. No respondents reported using public land or accessing land without payment.

In Section 3, among the 84 surveys, a substantial majority – 55 respondents (approximately 65.5%) – reported owning the private land covered by the survey, either in full or through partial/shared ownership. A small portion – 3 respondents, 3.6% – were identified as informal users of public land, and 8 respondents, 9.5% were found to be informal users of private land. A significant portion of respondents reported formal rental or usage arrangements, including 16 formal renters of private land (19%), 1 formal renter of public land (1.2%), and 1 user was the pasture land user who is a livestock producer (1.2%). There are no cases of private land being used free of charge, suggesting that land access is largely structured around ownership or formal/informal economic arrangements.

Across all sections, among the 274 surveys, a majority of respondents – 144 respondents (approximately 52.6%) – reported owning private land, either fully or through shared ownership. A substantial proportion – 111 respondents (40.5%) – were identified as formal renters of private land, highlighting the significant role of rental arrangements in land access across the Project area. Smaller shares of respondents were identified as informal users, including 13 respondents (4.7%) using private land informally and 3 respondents (1.1%) using public land informally. In addition, 1 respondent (0.4%) reported renting public land, and 1 respondent (0.4%) was identified as a pasture land user. No cases of free-of-charge private land use were reported.

Overall, the findings indicate that land tenure is predominantly structured around private ownership and formal rental arrangements, with a smaller but important share of informal use. This mixed tenure structure suggests that while a majority of households have secure ownership, a considerable proportion relies on non-ownership access mechanisms, which is critical for assessing potential livelihood risks and vulnerability in the context of the Project.

During the RAP surveys, in Section 1 and Section 3 none of the households reported that they are involved in ongoing legal proceedings concerning land ownership. In Section 2, 2 of the households reported that they are involved in ongoing legal proceedings concerning land ownership. One case involves an ongoing dispute initiated by a co-owner for sale, while the other has remained inactive since 2019, indicating potential uncertainties in land ownership.

Table 5-44. Land Ownership or Tenancy Status of Affected Parcels

Section	Ownership of the Parcel Containing the Affected Parcels	Number of Responses (Questionnaire)	Percent (%)	Notes
Section 1 (KM 0-35)	**Owner of the private land** (in full or through partial/shared ownership)	79	45.7	16 respondents (The land is owned by a close relative (e.g. parent, spouse), and the respondent is the user)
	Informal user of public land	0	0	
	Informal user of private land	1	0.5	
	Formal renter of private land	92	53.2	
	Formal renter of public land	0	0	
	Formal user of private land, with no rental payment	0	0	
	Other (User of pasture land)	1	0.5	
	Total	**173**	**100**	
Section 2 (KM 35-70)	**Owner of the private land** (in full or through partial/shared ownership)	10	58.8	1 respondent (The land is owned by a close relative e.g. parent, spouse, and the respondent is the user)
	Informal user of public land	0	0	
	Informal user of private land	4	23.5	
	Formal renter of private land	3	17.6	
	Formal renter of public land	0	0	
	Formal user of private land, with no rental payment	0	0	
	Other (User of pasture land)	0	0	
	Total	**17**	**100**	
Section 3 (KM 70-105)	**Owner of the private land** (in full or through partial/shared ownership)	55	65.5	8 respondents (The land is owned by a close relative e.g. parent, spouse, and the respondent is the user)
	Informal user of public land	3	3.6	
	Informal user of private land	8	9.5	
	Formal renter of private land	16	19.0	
	Formal renter of public land	1	1.2	
	Formal user of private land, with no rental payment	0	0	
	Other (User of pasture land)	1	1.2	
	Total	**84**	**100**	
All Sections	**Owner of the private land** (in full or through partial/shared ownership)	144	52.6	25 respondents (The land is owned by a close relative e.g. parent, spouse, and the respondent is the user)
	Informal user of public land	3	1.1	
	Informal user of private land	13	4.7	
	Formal renter of private land	111	40.5	
	Formal renter of public land	1	0.4	
	Formal user of private land, with no rental payment	0	0	
	Other (User of pasture land)	1	0.4	
	Total	**274**	**100**	

Source: RAP Field Surveys (February – March 2026).

5.2.5.4. Inheritance and Succession Status

As presented in Table 5-45, in Section 1, out of the 173 surveys, 53 respondents (30.6%) reported having acquired the land through inheritance, while 120 respondents (69.4%) indicated that their land was not inherited. Among those who inherited land, 45 households have inheritance certificates, while 8 do not have such documentation.

In Section 2, out of the 17 surveys, 4 respondents (23.5%) reported acquiring the land through inheritance, while 13 respondents (76.5%) did not. Among these, 3 households have inheritance certificates, while 1 does not have such documentation.

In Section 3, out of the 84 surveys, 32 (38.1%) reported having acquired the land through inheritance. An additional 52 responses reported that their land was not acquired through inheritance. Among these, 25 households indicated they possess inheritance certificates, while 7 stated they do not have such documentation.

Across all sections, out of the 274 surveys, 89 respondents (32.5%) reported having acquired the land through inheritance, while the majority – 185 respondents (67.5%) – indicated that their land was not inherited. Among those who inherited land, 73 households possess inheritance certificates, while 16 reported not having such documentation.

Table 5-45. Acquisition of the Affected Parcel through Inheritance

Section	Acquired through Inheritance?	Number of Responses (Questionnaire)	Percentage (%)	Status of Inheritance Documentation ("*Veraset Belgesi*")
Section 1 (KM 0-35)	**Yes**	53	30.6	- 45 have the inheritance certificates - 8 do not have inheritance certificates
	No	120	69.4	--
	Total	**173**	**100**	-
Section 2 (KM 35-70)	**Yes**	4	23.5	- 3 have the inheritance certificates - 1 does not have inheritance certificates
	No	13	76.5	--
	Total	**17**	**100**	-
Section 3 (KM 70-105)	**Yes**	32	38.1	- 25 have the inheritance certificates - 7 do not have inheritance certificates
	No	52	61.9	--
	Total	**84**	**100**	--
All Sections	**Yes**	89	32.5	- 73 have the inheritance certificates - 16 do not have inheritance certificates
	No	185	67.5	--
	Total	**274**	**100**	--

Source: RAP Field Surveys (February – March 2026).

5.2.5.5. Income Sources

The **sources of income** for households in the affected areas include the following:

- Agriculture
- Retirement pension
- Monthly salary
- Animal husbandry
- Trade
- Rental income

Table 5-46 summarises the primary sources of income reported by the surveyed households.

In Section 1, agriculture (crop production) is the dominant source of income, reported by 128 households (74.0%). This is followed by animal husbandry (9.2%) and pension income (6.4%). Other income sources such as monthly salary (5.2%), trade/business (3.5%), and rental income (1.7%) remain relatively limited.

In Section 2, agriculture remains the primary source of income, reported by 9 households (52.9%), although at a lower level compared to other sections. Monthly salary and pension income each account for 11.8%, indicating a relatively more diversified income structure. Animal husbandry represents a smaller share (5.9%), while no respondents reported trade/business or rental income. A notable share (17.6%) provided no response.

In Section 3, agriculture is the predominant source of income, reported by 67 households (79.8%), representing the highest reliance among all sections. Animal husbandry (11.9%) and trade/business (4.8%) follow, while pension income accounts for 3.6%. No respondents reported income from salary or rental sources.

Across all sections, agriculture (crop production) is the main source of income, reported by 204 households (74.5%), indicating a strong dependence on agricultural livelihoods. This is followed by animal husbandry (9.9%) and pension income (5.8%), while other sources such as monthly salary (4.0%), trade/business (3.6%), and rental income (1.1%) remain limited.

Overall, the findings highlight a predominantly agriculture-based economy with low levels of income diversification, which may increase vulnerability to project-related impacts on land and agricultural production.

In addition to reporting the income sourced, affected persons also requested that information be provided on their income and expenditures. The information collected in response to this request has been duly taken into account, and the corresponding data has informed the assessment of household vulnerabilities (i.e. low income households), as presented in Chapter 12.

Table 5-46. Primary Sources of Income for Households

Section	Primary Source of Income	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Agriculture (Crop Production)**	128	74.0
	Monthly Salary	9	5.2
	Animal Husbandry	16	9.2
	Trade / Business	6	3.5
	Pension	11	6.4
	Rental Income	3	1.7
	No response	0	0
	Total	**173**	**100**
Section 2 (KM 35-70)	**Agriculture (Crop Production)**	9	52.9
	Monthly Salary	2	11.8
	Animal Husbandry	1	5.9
	Trade / Business	0	0
	Pension	2	11.8
	Rental Income	0	0
	No response	3	17.6
	Total	**17**	**100**
Section 3 (KM 70-105)	**Agriculture (Crop Production)**	67	79.8
	Monthly Salary	0	0
	Animal Husbandry	10	11.9
	Trade / Business	4	4.8
	Pension	3	3.6
	Rental Income	0	0
	No response	0	0
	Total	**84**	**100**
All Sections	**Agriculture (Crop Production)**	204	74.5
	Monthly Salary	11	4.0
	Animal Husbandry	27	9.9
	Trade / Business	10	3.6
	Pension	16	5.8
	Rental Income	3	1.1
	No response	3	1.1
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.6. Agricultural Activities on Affected Parcels

As detailed in Table 5-47, in Section 1, agricultural activity is practiced on a vast majority of affected parcels (167 out of 173, 96.5%). Open-field agriculture is the most prevalent type in the section. Only a very small proportion of parcels (2 parcels, 1.2%) are either uncultivated or used for other purposes such as housing, while 4 responses (2.4%) were not reported.

In Section 2, agricultural activity is practiced on a majority of affected parcels (13 out of 17, 76.5%). Open-field agriculture is the most prevalent type in the section. However, a relatively higher proportion of parcels (4 parcels, 23.5%) are either uncultivated or used for other purposes such as housing, and no missing responses were recorded.

In Section 3, agricultural activity is practiced on a vast majority of affected parcels (81 out of 84, 96.4%). Open-field agriculture is the most prevalent type in the section.

Across all sections, agricultural activity is practiced on a vast majority of affected parcels (261 out of 274, 95.3%). Open-field agriculture is by far the most prevalent type of land use. A small proportion of parcels (9 parcels, 3.3%) are either uncultivated or used for other purposes such as housing, while only a very limited number of responses (1.5%) were not reported.

Overall, the findings indicate that the affected parcels are overwhelmingly used for agricultural production, highlighting the critical importance of land for livelihoods in the Project area.

Table 5-47. Agricultural Activities on Affected Parcels

Section	Agriculture on Affected Parcel	Number of Responses (Questionnaire)	Percentage (%)
Section 1 (KM 0-35)	**Practice open-field agriculture**	167	96.5
	Uncultivated or used for other purposes (such as housing)	2	1.2
	No response	4	2.4
	Total	**173**	**100**
Section 2 (KM 35-70)	**Practice open-field agriculture**	13	76.5
	Uncultivated or used for other purposes (such as housing)	4	23.5
	No response	0	0
	Total		
Section 3 (KM 70-105)	**Practice open-field agriculture**	81	96.4
	Uncultivated or used for other purposes (such as housing)	3	3.6
	No response	0	0
	Total	**84**	**100**
All Sections	**Practice open-field agriculture**	261	95.3
	Uncultivated or used for other purposes (such as housing)	9	3.3
	No response	4	1.5
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

In Section 1, the analysis of agricultural production shows that wheat is the most widely cultivated crop, produced at a very high level (142 responses). Sunflower follows as the second most common crop (116 responses) and is typically cultivated together with wheat as part of a rotational farming system. Barley (63 responses) and canola (54 responses) are also widely produced, supporting this dominant crop pattern.

Other crops are produced at considerably lower levels. Fodder crops (5 responses) are cultivated by a limited number of households, mainly in connection with livestock activities. Small-scale vegetable production, including tomato/cucumber (6 responses) and melon-watermelon (13 responses), is present but limited.

Crop diversification remains limited. Crops such as maize (2 responses) and potato/onion (2 responses) are cultivated by only a few households. No sugar beet production was reported.

In addition, other crops (8 responses), including chickpea, vineyard, beans, artichoke, and fruits, indicate some diversification; however, these are limited in scale and mostly serve supplementary or household consumption purposes.

Overall, the findings indicate a highly concentrated agricultural structure in Section 1, dominated by wheat and sunflower, with limited diversification.

In Section 2, the analysis of agricultural production shows that wheat and sunflower are the most widely cultivated crops, each with 7 responses, indicating a balanced dominance between the two. Barley (3 responses) and canola (1 response) are produced at a much lower level, suggesting a limited presence of secondary crops.

Other crops are almost absent. No households reported producing fodder crops, maize, tomato/cucumber, melon-watermelon, or sugar beet. Only potato/onion (1 response) appears at a minimal level.

Crop diversification is extremely limited. The only notable variation comes from other crops (4 responses), including walnut, vineyard, and various fruits, which indicate small-scale and non-commercial production activities.

Overall, the findings indicate a very limited and low-diversity agricultural structure in Section 2, with production largely restricted to wheat and sunflower and minimal engagement in alternative crops.

In Section 3, the analysis of agricultural production shows that wheat is the most widely cultivated crop (79 responses), followed closely by sunflower (76 responses). These two crops dominate the agricultural system and are typically cultivated together as part of a rotational farming structure. Barley (13 responses) and canola (12 responses) are also produced at a moderate level, supporting this dominant pattern.

Other crops are produced at considerably lower levels. Fodder crops (10 responses) indicate some livestock-related activity. Melon-watermelon (6 responses) and maize (4 responses) are present but limited. Potato/onion (3 responses) and tomato/cucumber (1 response) are produced by only a few households.

Crop diversification remains limited. No households reported producing sugar beet, and alternative crop production remains minimal.

In addition, other crops (2 responses), including walnut and strawberry, indicate very limited diversification.

Across all sections, the analysis of agricultural production shows that wheat is the most widely cultivated crop, with a total of 228 responses, followed by sunflower with 199 responses. These two crops clearly dominate the agricultural structure and are widely cultivated together as part of a rotational farming system throughout the study area. Together, they account for a substantial majority of all reported crop production activities.

Barley (79 responses) and canola (67 responses) form the secondary crop group and are also relatively common, although their production levels are significantly lower than wheat and sunflower. This indicates a production system that is still diversified within traditional field crops but remains strongly centered on a limited number of staples.

Other crops are produced at considerably lower levels. Melon-watermelon (19 responses) and fodder crops (15 responses) represent the most notable minor crop groups, with fodder crops reflecting a limited level of livestock-related agricultural activity. Tomato/cucumber (7 responses), maize (6 responses), and potato/onion (6 responses) are cultivated by only a small number of households, indicating minimal engagement in vegetable and alternative crop production.

Crop diversification remains limited overall. No sugar beet production was reported, and there is no meaningful presence of aromatic or medicinal plant cultivation.

In addition, other crops (14 responses), including walnut, vineyard products, legumes, and various fruits, indicate some degree of diversification; however, these activities are limited in scale and are primarily intended for supplementary or household consumption rather than commercial production.

Overall, the findings indicate a highly concentrated agricultural structure across all sections, dominated by wheat and sunflower, with limited diversification into alternative crops and a strong reliance on traditional field crop production patterns.

Table 5-48. Agricultural Products on Affected Parcels

Section	Agriculture on Affected Parcel	Number of Responses	Percentage (%)
Section 1 (KM 0-35)	**Wheat**	142	34.5
	Sunflower	116	28.2
	Barley	63	15.3
	Canola	54	13.1
	Fodder Crops	5	1.2
	Maize	2	0.5
	Potato / Onion	2	0.5
	Tomato / Cucumber	6	1.5
	Melon (Bostan)	13	3.2
	Sugar Beet	0	0
	Other (chickpea, vineyard, beans, artichoke and various fruits&vegetables)	8	1.9
Total		**411**	**100**
Section 2 (KM 35-70)	**Wheat**	7	30.4
	Sunflower	7	30.4
	Barley	3	13.0
	Canola	1	4.3
	Fodder Crops	0	0.0
	Maize	0	0.0
	Potato / Onion	1	4.3
	Tomato / Cucumber	0	0.0
	Melon (Bostan)	0	0.0
	Sugar Beet	0	0.0
	Other (walnut, vineyard and various fruits)	4	17.4
Total		**23**	**100**
Section 3 (KM 70-105)	**Wheat**	79	38.3
	Sunflower	76	36.9
	Barley	13	6.3
	Canola	12	5.8
	Fodder Crops	10	4.9
	Maize	4	1.9
	Potato / Onion	3	1.5
	Tomato / Cucumber	1	0.5
	Melon (Bostan)	6	2.9
	Sugar Beet	0	0.0
	Other (walnut and Strawberry)	2	1.0
Total		**206**	**100**
All Sections	**Wheat**	**228**	35.6
	Sunflower	**199**	31.1
	Barley	**79**	12.3
	Canola	**67**	10.5
	Fodder Crops	**15**	2.3
	Maize	**6**	0.9
	Potato / Onion	**6**	0.9
	Tomato / Cucumber	**7**	1.1
	Melon (Bostan)	**19**	3.0
	Sugar Beet	0	0.0
	Other	**14**	2.2
	Total	**640**	**100**

Source: RAP Field Surveys (February – March 2026).

Purpose of Agricultural Production

Table 5-49 illustrates the primary purpose of agricultural production among affected households.

In Section 1, out of the 173 surveyed households, 152 households (87.9%) reported engaging in agriculture primarily for commercial purposes, indicating a very strong reliance on farming as an income-generating activity.

A very small number of households, 3 households (1.7%), reported producing mainly for household consumption (subsistence). Additionally, 5 households (2.9%) indicated fodder production, while another 5 households (2.9%) reported dual-purpose production, combining subsistence, commercial, and/or fodder use.

A limited number of parcels, 3 households (1.7%), are uncultivated or used for other purposes, such as housing. Meanwhile, 5 households (2.9%) did not provide a response.

In Section 2, out of the 17 surveyed households, 10 households (58.8%) reported engaging in agriculture primarily for commercial purposes, indicating that income generation remains the main objective, although at a lower level compared to Section 1.

No households reported production solely for subsistence or fodder use. However, 2 households (11.8%) indicated dual-purpose production, combining subsistence and commercial activities.

A relatively high proportion of parcels, 5 households (29.4%), are uncultivated or used for other purposes, suggesting lower agricultural intensity in this section. No households provided non-responses.

In Section 3, of the 84 surveyed households, 52 households (61.9%) reported engaging in agriculture primarily for commercial purposes, indicating a strong reliance on farming as an income-generating activity. 5 households (6.0%) indicated that they produce mainly for household consumption (subsistence), while a further 21 households (25.0%) reported dual-purpose production, combining subsistence and commercial aims.

A small number of parcels – 3 (3.6%) – are cultivated exclusively for fodder, supporting livestock-based livelihoods. Meanwhile, 3 parcels (3.6%) are uncultivated or used for other purposes such as livestock sheltering.

Among affected households across all sections, out of the total 274 surveyed households, 214 households (78.1%) reported engaging in agriculture primarily for commercial purposes, indicating a strong dependence on agriculture as a main source of income throughout the project area.

A smaller group of households, 8 households (2.9%), reported producing mainly for household consumption (subsistence). In addition, 28 households (10.2%) indicated a dual-purpose production system, combining subsistence and commercial activities, reflecting a mixed livelihood strategy.

Agricultural production solely for fodder use is limited, reported by 8 households (2.9%), suggesting that livestock-related production exists but is not a dominant activity. Meanwhile, 11 households (4.0%) reported that their parcels are uncultivated or used for other purposes, such as housing or non-agricultural uses.

A very small proportion, 5 households (1.8%), did not provide a response.

Overall, the findings indicate that agricultural production in the project area is predominantly market-oriented, with the vast majority of households engaged in commercial farming. Subsistence and mixed production systems remain secondary, while non-cultivated land and fodder-focused production represent only a minor share of overall land use.

Table 5-49. Purpose of Agricultural Production

Section	Purpose of Agricultural Production	Number of Responses (Questionnaire)	Percentage (%)
Section 1 (KM 0-35)	**For own household consumption (subsistence)**	3	1.7
	For large-scale commercial purposes	152	87.9
	For fodder use (animal feed)	5	2.9
	Both for subsistence, commercial purposes and/or fodder use	5	2.9
	Uncultivated or used for other purposes (such as housing)	3	1.7
	No response	5	2.9
Total		**173**	**100**
Section 2 (KM 35-70)	**For own household consumption (subsistence)**	0	0
	For large-scale commercial purposes	10	58.8
	For fodder use (animal feed)	0	0
	Both for subsistence, commercial purposes and/or fodder use	2	11.8
	Uncultivated or used for other purposes (such as housing)	5	29.4
	No response	0	0
Total		**17**	
Section 3 (KM 70-105)	**For own household consumption (subsistence)**	5	6.0
	For large-scale commercial purposes	52	61.9
	For fodder use (animal feed)	63	3.6
	Both for subsistence, commercial purposes and/or fodder use	21	25.0
	Uncultivated or used for other purposes (such as housing)	3	3.6
	No response	0	0.0
Total		**84**	**100**
All Sections	**For own household consumption (subsistence)**	8	2.9
	For large-scale commercial purposes	214	78.1
	For fodder use (animal feed)	8	2.9
	Both for subsistence, commercial purposes and/or fodder use	28	10.2
	Uncultivated or used for other purposes (such as housing)	11	4.0
	No response	5	1.8
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

Presence of Irrigation Infrastructure

As presented in Table 5-50, presents the availability of irrigation infrastructure on the affected parcels.

In Section 1, out of 173 affected parcels, 12 (6.9%) reported the presence of irrigation infrastructure, while 152 households (87.9%) stated that their parcels lack irrigation infrastructure. 9 respondents (5.2%) did not provide a response.

In Section 2, out of 17 affected parcels, 3 (17.6%) reported the presence of irrigation infrastructure, while 10 households (58.8%) stated that their parcels lack irrigation infrastructure. 4 respondents (23.5%) did not provide a response.

In Section 3, out of 84 affected parcels, 12 (14.3%) reported the presence of irrigation infrastructure, while 70 households (83.3%) stated that their parcels lack irrigation infrastructure. 2 respondents did not provide a response.

Across all sections, out of 274 affected parcels, 27 (9.9%) reported the presence of irrigation infrastructure, while 232 households (84.7%) stated that their parcels lack irrigation infrastructure. 15 respondents (5.5%) did not provide a response.

Table 5-50. Presence of Irrigation Infrastructure on Affected Parcel

Section	Presence of Irrigation Infrastructure on Affected Parcel	Number of Responses (Questionnaire)	Percentage (%)
Section 1 (KM 0-35)	**Yes**	12	6.9
	No	152	87.9
	No response	9	5.2
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes**	3	17.6
	No	10	58.8
	No response	4	23.5
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes**	12	14.3
	No	70	83.3
	No response	2	2.4
	Total	**84**	**100**
All Sections	**Yes**	27	9.9
	No	232	84.7
	No response	15	5.5
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

Table 5-51 presents the responses of surveyed households regarding the need for assistance in identifying alternative agricultural land. In Section 1, out of 173 affected parcels, 29 parcels (16.8%) stated that they would require support in locating new parcels suitable for agricultural use. In contrast, 137 parcels (79.2%) indicated that they would not need such assistance, while 7 respondents (4.0%) did not provide a response.

In Section 2, out of 17 affected parcels, 3 parcels (17.6%) stated that they would require support in locating new parcels suitable for agricultural use. In contrast, 9 parcels (52.9%) indicated that they would not need such assistance, while 5 respondents (29.4%) did not provide a response.

In Section 3, out of 84 affected parcels, only 12 parcels (14.3%) stated that they would require support in locating new parcels suitable for agricultural use. In contrast, 71 parcels (84.5%) indicated that they would not need such assistance, while 1 respondent (1.2%) did not provide a response.

Across all sections, out of 274 affected parcels, 44 parcels (16.1%) stated that they would require support in locating new parcels suitable for agricultural use. In contrast, 217 parcels (79.2%) indicated that they would not need such assistance, while 13 respondents (4.7%) did not provide a response.

The responses regarding the type of assistance needed indicate that affected households primarily require support related to accessing alternative agricultural land. The most frequently expressed need is assistance in finding suitable land, including identifying available parcels, locating land in nearby areas, and being guided toward appropriate options.

A significant number of respondents emphasized the need for market-related support, such as researching land prices, rental conditions, and available plots, as well as assistance in negotiating prices. This reflects the challenges households face due to increasing land prices and limited availability of affordable agricultural land in the project area.

Another commonly stated need is financial support, including direct monetary assistance, rental subsidies, or support for leasing land. Several respondents also referred to the possibility of accessing public or treasury land, indicating an expectation for institutional support in land allocation.

In addition, some households highlighted the need for technical support, such as assistance in land identification, land suitability assessment, and soil quality evaluation, suggesting that access alone is not sufficient without ensuring agricultural viability.

A smaller group of respondents mentioned the need for facilitation and coordination support, including intermediation with landowners, communication support, and guidance through relevant processes.

Overall, the findings indicate that assistance needs across all sections are multi-dimensional, but strongly concentrated around land access, affordability, and information gaps. This highlights the importance of providing integrated support mechanisms, combining land identification, financial assistance, and advisory services to effectively restore agricultural livelihoods.

Table 5-51. Assistance Need in Finding Alternative Agricultural Land

Section	Assistance Need	Number of Responses (Questionnaire)	Percentage (%)
Section 1 (KM 0-35)	**Yes, assistance needed**	29	16.8
	No, not needed	137	79.2
	No response	7	4.0
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes, assistance needed**	3	17.6
	No, not needed	9	52.9
	No response	5	29.4
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes, assistance needed**	12	14.3
	No, not needed	71	84.5
	No response	1	1.2
	Total	**84**	**100**
All Sections	**Yes, assistance needed**	44	16.1
	No, not needed	217	79.2
	No response	13	4.7
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.7. Total Productive Area

As shown in Table 5-52, Section 1, out of 173 surveyed households, 155 households (89.6%) reported that they own or use additional parcels outside the motorway expropriation corridor, while 8 households (4.6%) indicated that they do not have access to other land, and 10 households (5.8%) did not provide a response.

In Section 2, out of 17 surveyed households, 13 households (76.5%) reported that they own or use additional parcels outside the motorway expropriation corridor, while no households (0%) indicated that they do not have access to other land, and 4 households (23.5%) did not provide a response.

In Section 3, 70 out of 84 surveyed households (83.3%) reported that they own or use additional parcels outside the motorway expropriation corridor, while 13 households (15.5%) indicated that they do not have access to other land, while 1 household (1.2%) did not provide a response.

Across all sections, out of 274 surveyed households, 237 households (86.5%) reported that they own or use additional parcels outside the motorway expropriation corridor, while 21 households (7.7%) indicated that they do not have access to other land, and 16 households (5.8%) did not provide a response.

This distribution suggests that although most affected households have access to additional land, a notable minority lacks alternative agricultural resources. For these households, land loss due to expropriation may have a significant impact on livelihoods, particularly in the absence of alternative income sources.

Table 5-52. Presence of Other Parcels Owned or Used outside the Motorway Expropriation Corridor

Section	Presence of Other Parcels Owned or Used outside the Motorway Expropriation Corridor	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Yes**	155	89.6
	No	8	4.6
	No response	10	5.8
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes**	13	76.5
	No	0	0
	No response	4	23.5
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes**	70	83.3
	No	13	15.5
	No response	1	1.2
	Total	**84**	**100**
All Sections	**Yes**	237	86.5
	No	21	7.7
	No response	16	5.8
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

Table 5-53 presents the distribution of total parcels in decares owned or used by affected households, both within and outside the motorway expropriation corridor.

In Section 1, out of 173 surveyed households, landholding is primarily concentrated in the 101–250 decar range (47 households; 27.2%), followed by 251–500 decars (31 households; 17.9%) and both 26–100 decars and 501–1000 decars (29 households each; 16.8%). A notable proportion of households, 17 households (9.8%), reported owning more than 1000 decars, indicating the presence of relatively large-scale agricultural operations. In contrast, very small landholdings (0–25 decars) account for only 10 households (5.8%).

In Section 2, out of 17 surveyed households, landholding is more limited and unevenly distributed. The largest group falls within the 101–250 decar range (4 households; 23.5%), followed by 26–100 decars (3 households; 17.6%). Smaller categories such as 0–25 decars and 251–500 decars each account for 2 households (11.8%), while only 1 household (5.9%) reported landholdings between 501–1000 decars. No households reported owning more than 1000 decars. A significant proportion, 5 households (29.4%), did not provide a response, which introduces uncertainty in the distribution.

For Section 3, the data indicates that landholding sizes vary considerably among households, with a concentration in medium-sized holdings. The largest share of households, 31 households (36.9%), reported owning or using between 101 and 250 decares of land. This is followed by 22 households (26.2%) with landholdings between 26 and 100 decares, and 15 households (17.9%) within the 251–500 decare range.

A smaller proportion of households fall into both the lower and higher ends of the distribution. Only 2 households (2.4%) reported landholdings of 0–25 decares, indicating that very small-scale land use is limited in the project area. At the upper end, 10 households (11.9%) reported owning or using between 501 and 1000 decares, while 3 households (3.5%) hold more than 1000 decares, reflecting the presence of relatively large-scale agricultural operations. One household (1.2%) did not provide a response.

Across all sections, out of 274 surveyed households, landholding is primarily concentrated in the 101–250 decar range (82 households; 29.9%), followed by 26–100 decars (54 households; 19.7%) and 251–500 decars (48 households; 17.5%). Larger landholdings are also present, with 40 households (14.6%) owning 501–1000 decars and 20 households (7.3%) reporting more than 1000 decars. Very small-scale landholdings (0–25 decars) remain limited (14 households; 5.1%). A small proportion of respondents (16 households; 5.8%) did not provide an answer.

Overall, the findings indicate a predominantly medium-scale agricultural structure across the project area, with a moderate presence of large-scale land users and a relatively small proportion of very small landholders. This structure supports commercial agricultural activity but may also reflect varying levels of resilience depending on land size.

This information will require verification during RAP implementation in order to accurately assess the level of impact on affected households, particularly those who may lose a significant proportion of their productive land. Verification will be carried out through the review of official documentation, such as title deeds, as well as through local validation mechanisms, including consultations with mukhtars and other knowledgeable community members, especially in cases involving informal land use.

In addition to the distribution of landholding size, the collected data contributes to the broader assessment of household vulnerability and dependency on land-based livelihoods, as further elaborated in Chapter 12.

Table 5-53. Number of Parcels Owned or Used by Affected Households inside and outside the Expropriation Corridor

Section	Total Decars of Parcels Owned or Used	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**0-25**	10	5.8
	26-100	29	16.8
	101-250	47	27.2
	251-500	31	17.9
	501-1000	29	16.8
	1000 +	17	9.8
	No response	10	5.8
	Total	**173**	**100**
Section 2 (KM 35-70)	**0-25**	2	11.8
	26-100	3	17.6
	101-250	4	23.5
	251-500	2	11.8
	501-1000	1	5.9
	1000 +	0	0.0
	No response	5	29.4
	Total	**17**	**100**
Section 3 (KM 70-105)	**0-25**	2	2.4
	26-100	22	26.2
	101-250	31	36.9
	251-500	15	17.9
	501-1000	10	11.9
	1000 +	3	3.5
	No response	1	1.2
	Total	**84**	**100**
All Sections	**0-25**	14	5.1
	26-100	54	19.7
	101-250	82	29.9
	251-500	48	17.5
	501-1000	40	14.6
	1000 +	20	7.3
	No response	16	5.8
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.8. Livestock Production

Table 5-54 presents the livestock ownership of the households, in Section 1, out of 173 surveyed households, 25 households (14.5%) reported that they own livestock, while a clear majority, 141 households (81.5%), indicated that they do not engage in animal husbandry. 7 respondents (4.0%) did not provide a response.

In Section 2, out of 17 surveyed households, 3 households (17.6%) reported that they own livestock, while 8 households (47.1%) stated that they do not engage in animal husbandry. 6 respondents (35.3%) did not provide a response.

In Section 3, the results indicate that livestock ownership is relatively limited in the project area, with only 27.4% of households reporting that they own animals, while a majority (72.6%) do not engage in animal husbandry. This suggests that crop production constitutes the primary livelihood activity, with livestock playing a supplementary role for a smaller proportion of households

Across all sections, out of 274 surveyed households, only 51 households (18.6%) reported that they own livestock, while a majority of 210 households (76.6%) indicated that they do not engage in animal husbandry. 13 respondents (4.7%) did not provide a response. This distribution suggests that livestock ownership is relatively limited across the project area, and that crop production constitutes the dominant livelihood activity, with livestock serving as a supplementary income source for a smaller proportion of households.

Table 5-54. Livestock Ownership among Households

Section	Livestock Ownership	Number of Responses	Percentage (%)
Section 1 (KM 0-35)	**Yes**	25	14.5
	No	141	81.5
	No response	7	4.0
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes**	3	17.6
	No	8	47.1
	No response	6	35.3
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes**	23	27.4
	No	61	72.6
	No response	0	0
	Total	**84**	**100**
All sections	**Yes**	51	18.6
	No	210	76.6
	No response	13	4.7
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

Livestock Composition by Type

Table 5-55 presents the livestock composition by type of the households.

In Section 1, livestock ownership is relatively limited in terms of participation but highly concentrated in a small number of households. Out of 25 livestock-owning households, the majority (13 households) own only cattle. A smaller number of households engage in small ruminant production (2 households) or beekeeping (2 households). Notably, 8 households practice mixed livestock production (both bovine and ovine, with or without beehives), and these households account for the majority of total livestock numbers. In particular, one household with a very high number of animals significantly skews the distribution. This indicates that livestock production in this section is not widespread but rather concentrated among a limited number of relatively larger producers.

Livestock ownership in Section 2 is extremely limited, with only 3 households reporting any form of animal husbandry. Among these, one household owns cattle, one engages in poultry production, and one keeps beehives. There is no mixed livestock production observed in this section. This suggests that livestock is not a significant livelihood component in Section 2, and agricultural activity is likely dominated by crop production rather than animal husbandry.

In Section 3, livestock ownership is more widespread compared to Section 2 but still moderate overall, with 24 households reporting livestock ownership. The majority of households (15) own only cattle, indicating that bovine

livestock is the dominant type. A smaller number of households engage in small ruminant production (2 households) or beekeeping (5 households). Mixed livestock production is limited (2 households), and no households combine livestock with beekeeping. Unlike Section 1, livestock ownership in this section is more evenly distributed, with no extreme concentration in a single household. This suggests a more balanced but still secondary role of livestock in household livelihoods.

Across all sections, livestock ownership is present in 52 households, but the distribution is highly uneven both geographically and structurally. The most common pattern is cattle ownership, with 29 households relying solely on bovine livestock. Mixed livestock production (both bovine and ovine) is observed in 9 households, and these households account for a disproportionately large share of total livestock numbers, indicating a concentration of productive assets. Small ruminant-only production (4 households) and beekeeping (8 households) remain relatively limited, while poultry production is almost negligible (only 1 household).

When livestock numbers are considered, a highly uneven distribution emerges across the project area. Although livestock ownership is relatively limited in terms of household participation, total animal numbers are heavily concentrated in a small number of households engaged in mixed livestock production. In particular, households raising both bovine and ovine livestock account for the majority of total animals, indicating a concentration of productive assets.

Small ruminants outnumber cattle, suggesting a preference for more flexible and lower-cost livestock systems. Beekeeping and poultry production remain marginal and play a supplementary role rather than constituting core livelihood activities.

Overall, the findings indicate that livestock production is not a widespread livelihood strategy but is economically significant for a limited number of households, particularly those engaged in larger-scale mixed livestock production.

Table 5-55. Livestock Composition by Type

Section	Livestock Type	Number of Households	Total Number of Animals
Section 1 (KM 0-35)	**Only Bovine (cattle)**	13	445
	Only Ovine (small ruminants)	2	190
	Poultry	0	0
	Beehives	2	14
	Both Bovine and Ovine	7	1,573 (414 Bovine – 1159 Ovine)
	Both Bovine and Ovine and Beehives	1	274 (19 Bovine- 250 Ovine – 5 Beehives)
	Total	**25**	
Section 2 (KM 35-70)	**Only Bovine (cattle)**	1	30
	Only Ovine (small ruminants)	0	0
	Poultry	1	60
	Beehives	1	4
	Both Bovine and Ovine	0	0
	Both Bovine/Ovine and Beehives	0	0
	Total	**3**	
Section 3 (KM 70-105)	**Only Bovine (cattle)**	15	501
	Only Ovine (small ruminants)	2	455
	Poultry	0	0
	Beehives	5	68
	Both Bovine and Ovine	2	335 (135 Bovine-200 Ovine)
	Both Bovine/Ovine and Beehives	0	0
	Total	**24**	--
All Sections	**Only Bovine (cattle)**	29	976
	Only Ovine (small ruminants)	4	645

Section	Livestock Type	Number of Households	Total Number of Animals
	Poultry	1	60
	Beehives	8	86
	Both Bovine and Ovine	9	1,908 (549 Bovines – 1359 Ovines)
	Both Bovine/Ovine and Beehives	1	274 (19 Bovine- 250 Ovine – 5 Beehives)
	Total	**52**	**1544 Bovines** **2254 Ovines** **91 Beehives** **60 Poultry**

Source: RAP Field Surveys (February – March 2026).

5.2.5.9. Usage of pasture, meadow and grazing land for livestock

Table 5-56 and Table 5-57 presents the analysis of grazing practices among livestock-owning households.

In Section 1, the findings indicate that pasture use is relatively limited within this group. Out of 23 livestock-owning households, 10 households (43.5%) reported that they utilize pasture, meadow, or grazing land, while a larger proportion, 13 households (56.5%), do not rely on such areas. In contrast, the use of non-pasture areas for grazing is slightly more common. A total of 12 households (52.2%) reported that they use alternative areas such as agricultural fields, roadside areas, or fallow land for grazing, while 11 households (47.8%) do not engage in such practices. This pattern suggests that livestock production in Section 1 is less dependent on natural pasture resources and instead relies more on controlled or alternative feeding practices. The relatively balanced use of non-pasture areas indicates a degree of flexibility in livestock management, likely associated with more intensive or semi-intensive production systems.

In Section 2 livestock ownership is extremely limited. Although a total of three households are recorded in the dataset, only one household actually owns livestock, while the remaining two households do not report any bovine or ovine animals. Accordingly, grazing-related findings in this section are effectively based on a single livestock-owning household. This household reported that it uses pasture, meadow, or grazing land (100%), while it does not utilize any non-pasture areas for grazing (0%).

In Section 3, where pasture use appears relatively common among livestock-owning households. Out of 19 households, 13 households (68.4%) reported using pasture, meadow, or grazing land, while 6 households (31.6%) do not rely on such areas. At the same time, the use of non-pasture areas is also notable. Of the 19 respondents, 9 households (47.4%) reported utilizing alternative grazing areas such as stubble fields, fallow land, or roadside areas, while 10 households (52.6%) do not engage in such practices. These findings suggest a mixed grazing system in Section 3, where households combine pasture-based and alternative feeding strategies. This indicates a certain level of adaptability in livestock management, allowing households to respond to variations in pasture availability and resource constraints.

Overall, the results indicate that livestock production systems in the project area are based on a mixed model, integrating natural grazing with non-pasture feeding strategies. This reflects both adaptive behavior and structural constraints in access to grazing land. Furthermore, the partial reliance on non-pasture areas suggests that existing pasture resources may be insufficient to fully support livestock needs. This is reinforced by the relatively high proportion of households utilizing alternative grazing areas, indicating pressure on natural pasture resources. The findings highlight that grazing land availability and accessibility are key factors shaping livestock production systems. Limitations in pasture resources contribute to the diversification of feeding strategies and may increase the vulnerability of livestock-dependent households, particularly in the face of land acquisition and changing land use patterns.

The responses to **'Is the grazing area sufficient?"** indicate that the majority of livestock-owning households consider existing grazing areas to be **insufficient**. The most frequently cited reasons include the limited size of pasture areas, the absence of available grazing land in some locations, and the mismatch between pasture capacity and the number of animals and producers. In addition, respondents highlighted issues related to the poor condition and lack of maintenance of existing pastures, as well as environmental factors such as drought and the drying of water sources. Accessibility constraints were also noted, with some grazing areas located at a distance or across roads, making their use more difficult. Furthermore, land use changes, particularly urbanization, industrial development, and the expansion of cultivated areas - were reported to have reduced the availability of grazing land. Overall, these findings suggest that grazing resources are both quantitatively and qualitatively constrained, limiting their ability to adequately support livestock production.

All livestock-owning households reported that they procure animal feed from external sources, highlighting a strong dependency on purchased inputs. This indicates that livestock production systems in the area are not solely reliant on natural grazing resources but are supported by market-based feed supply, which may increase vulnerability to input price fluctuations. Overall, the findings suggest that pasture resources are both quantitatively and qualitatively constrained, limiting their effectiveness in supporting livestock production and increasing reliance on alternative feeding practices.

Among those engaged in grazing, a considerable proportion of households reported that they **manage grazing themselves**, suggesting a reliance on household labor rather than external support. At the same time, a notable number of respondents stated that they **employ shepherds**, indicating the presence of more organized or labor-intensive livestock operations. In addition, some households reported that they **do not engage in grazing at all and rely solely on feed-based systems**, reflecting a shift toward stall-feeding practices. Overall, these findings suggest that livestock management in the project area is characterized by a mix of self-managed, hired labor, and feed-based systems, depending on the scale of production and access to grazing resources.

Detailed information regarding pasture use, seasonal patterns, and the importance of grazing areas for local livelihoods is elaborated in the Focus Group Discussions Section 5.2.5.17.

Table 5-56. Grazing on Pasture, Meadow and Grazing Lands

Section	Grazing on Pasture (Livestock Owners Only)	Number of Responses	Percentage (%)
Section 1 (KM 0-35)	**Yes**	10	43.5
	No	13	56.5
	Total (n=23)	**23**	**100**
Section 2 (KM 35-70)	**Yes**	1	100
	No	0	0
	Total (n=1)	1	**100**
Section 3 (KM 70-105)	**Yes**	13	68.4
	No	6	31.6
	Total (n=19)	**19**	**100**
All Sections	**Yes**	24	55.8
	No	19	44.2
	Total (n=43)	**43**	**100**

Source: RAP Field Surveys (February – March 2026).

Table 5-57. Grazing on Non-pasture Areas

Section	Grazing on Pasture (Livestock Owners Only)	Number of Responses	Percentage (%)
Section 1 (KM 0-35)	**Yes**	12	52.2
	No	11	47.8
	Total (n=23)	**23**	**100**
Section 2 (KM 35-70)	**Yes**	0	0
	No	1	100
	Total (n=1)	**1**	**100**
Section 3 (KM 70-105)	Yes	9	47.4
	No	10	52.6
	Total (n=19)	**19**	**100**
All Sections	**Yes**	21	48.8
	No	22	51.2
	Total (n=43)	**43**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.10. Livestock Production Activities

Table 5-58 presents the analysis of livestock production. In Section 1, the findings indicate that livestock production in this section is strongly oriented toward commercial purposes. All 23 livestock-owning households (100%) reported engaging in animal trade (buying and/or selling), demonstrating that livestock serves as a key source of income generation. In contrast, milk production is less widespread. Only 9 households (39.1%) reported producing milk, while a majority of 14 households (60.9%) are not involved in dairy production. This suggests that, although livestock is widely used for commercial purposes, dairy activities are not a dominant component of livestock production in this section.

In Section 2, livestock production activities are extremely limited, with only one livestock-owning household recorded. This household (100%) reported engaging in both animal trade and milk production.

While this suggests a mixed use of livestock for both income generation and household consumption, the findings are based on a single observation and therefore cannot be generalized across the section. Nonetheless, it indicates that livestock production, where present, may serve multiple functions even at a very small scale.

In Section 3, the findings indicate that livestock production in the project area serves both commercial and subsistence purposes. Among the 19 livestock-owning households that responded to these questions, 13 households (68.4%) reported engaging in animal trade, suggesting that livestock contributes to cash income generation for a majority of respondents. Likewise, 13 households (68.4%) stated that they produce milk and dairy products, indicating that livestock also plays an important role in household consumption and, in some cases, small-scale sales. The overlap between animal trade and dairy production points to a mixed livestock production system in which households use their animals both for income generation and for meeting daily household needs. By contrast, 6 households (31.6%) reported that they are not involved in these activities, suggesting that livestock ownership in those cases may be more limited in scale or maintained for supplementary purposes only.

Across all sections livestock production combines both commercial and subsistence-oriented activities. Out of 43 livestock-owning households, 37 households (86.0%) reported engaging in animal trade, highlighting the importance of livestock as a source of income.

At the same time, 23 households (53.5%) reported milk production, indicating that livestock also plays a significant role in household consumption and, in some cases, small-scale sales. However, nearly half of the households (46.5%) are not involved in dairy activities, suggesting variability in production patterns.

These findings point to a dual-function livestock system in which animals are used both for generating cash income and for meeting household needs.

Overall, the findings suggest that livestock production in the project area is predominantly semi-commercial in nature. While animal trade is widely practiced and represents the primary economic function of livestock, dairy production is less consistently adopted across households.

In conclusion, livestock production represents an important but unevenly distributed livelihood component, with its role ranging from primary income generation in some sections to a more limited or supplementary activity in others.

Table 5-58. Livestock Production Activities

Section	Activity	Number of Responses	Percentage (%)
Section 1 (KM 0-35)	Animal trade (buying/selling) – Yes	23	100
	Animal trade (buying/selling) – No	0	0
	Milk production – Yes	9	39.1
	Milk production – No	14	60.9
	Total (n=23)	**23**	**100**
Section 2 (KM 35-70)	Animal trade (buying/selling) – Yes	1	100
	Animal trade (buying/selling) – No	0	0
	Milk production – Yes	1	100
	Milk production – No	0	0
	Total (n=1)	**1**	**100**
Section 3 (KM 70-105)	Animal trade (buying/selling) – Yes	13	68.4
	Animal trade (buying/selling) – No	6	31.6
	Milk production – Yes	13	68.4
	Milk production – No	6	31.6
	Total (n=19)	**19**	**100**
All Sections	Animal trade (buying/selling) – Yes	37	86.0
	Animal trade (buying/selling) – No	6	14.0
	Milk production – Yes	23	53.5
	Milk production – No	20	46.5
	Total (n=43)	**43**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.11. Beekeeping and Usage of Forests

According to the survey results, beekeeping activities in the project area appear to be relatively limited and play a supplementary role within overall livelihood strategies. Across all sections, a total of 8 households reported owning beehives, with a combined number of 91 beehives, indicating that beekeeping is not a primary livelihood activity but rather a secondary or complementary source of income.

At the section level, beekeeping is observed in all sections but at varying scales. In Section 1, 2 households reported owning a total of 14 beehives, suggesting a very limited engagement in beekeeping. In Section 2, only 1 household reported beekeeping activity with 4 beehives, reflecting the low overall level of livestock-related activities in this section. In Section 3, beekeeping is relatively more common, with 5 households owning a total of 68 beehives, indicating a comparatively higher but still moderate level of engagement.

Beekeeping activities in the project area are predominantly non-migratory in nature. None of the respondents reported practicing migratory beekeeping, suggesting that beekeeping is generally carried out on a fixed, local basis rather than through seasonal relocation of hives. The reasons for not engaging in migratory beekeeping are primarily related to practical and socio-demographic constraints. Respondents frequently cited lack of time due to other agricultural or livelihood activities, as well as age-related limitations, as key factors. In addition, some households indicated that their beekeeping activities are intentionally limited to household needs or to support crop production through pollination, rather than for commercial expansion.

In terms of production, annual honey yields vary significantly across households, ranging from relatively small quantities (20–40 kg / 6 households)) to higher outputs (150-450 kg-3 households), indicating differences in scale and intensity of beekeeping activities.

Regarding the use of bee products, the majority of households reported that they consume most or all of their production, highlighting the subsistence-oriented nature of beekeeping. However, a smaller number of households (3 households) indicated that they partially or equally allocate production for sale, suggesting the presence of limited market engagement.

Overall, the findings suggest that beekeeping in the project area is generally small-scale, non-commercial, and complementary to other livelihood activities, with only a few households demonstrating a more market-oriented or higher-capacity production structure.

According to the survey results in all sections, out of 274 responses, only 3 households reported benefiting from forest resources. The limited responses indicate that forest use is not a common livelihood activity in the project area. Among the few households that do utilize forest resources, activities include mushroom collection, gathering forest fruits, and wood collection for house heating. The reported use is for household consumption, rather than for commercial purposes. Overall, the findings suggest that forest resources play a minimal role in local livelihoods, and dependence on forest-based products is very low across the surveyed population.

5.2.5.12. Investment Plans in Remaining or Alternative Landholdings

In Section 1, when asked how they would invest in their remaining or alternative landholdings if they had access to capital, the responses indicate that the primary investment priority among affected households is land expansion, with 8 respondents stating that they would purchase or lease additional land.

This is followed by investments in irrigation infrastructure, with 4 respondents expressing the need for wells, drilling, or irrigation systems, highlighting the importance of water access in agricultural production.

A notable number of respondents (6) also emphasized investments in mechanization and modern agricultural technologies, including tractors, harvesters, and advanced farming systems. In addition, 3 respondents indicated an interest in greenhouse cultivation, suggesting a shift toward more intensive and controlled production methods.

Furthermore, 4 households highlighted investments aimed at increasing productivity, such as improved fertilizers and crop management practices, while 3 respondents expressed interest in livestock-related investments.

The responses also provide insight into the expected scale of investment, with several respondents referring to high-cost equipment and infrastructure. For example, irrigation-related investments were estimated (with 2026 prices) at approximately TRY 1–2 million, while machinery such as combine harvesters could reach around TRY 6 million, indicating that substantial capital would be required to realize these investment plans.

At the same time, 1 respondent stated that they would not make any investment due to age-related constraints.

It should also be noted that, out of a total of 173 respondents, only a limited number provided detailed answers to this question, while a significant share did not respond or provided no specific investment preference. This suggests that while clear investment priorities can be identified among respondents, the findings should be interpreted with caution in terms of overall representativeness.

In Section 2, a small number of respondents (2) indicated that they would invest in crop diversification, stating that they would cultivate alternative crops, while others emphasized further land expansion as a priority.

In Section 3, when asked how they would invest in their remaining or alternative landholdings if they had access to capital, the responses indicate that the primary investment priority among affected households is improving irrigation infrastructure, with 10 respondents highlighting the need for wells, drilling, or irrigation systems. This is followed by land expansion (9 respondents) and investments in productivity enhancement, including improved seeds and agricultural inputs. A notable share of respondents also expressed interest in livestock-related investments as an alternative or complementary livelihood strategy.

At the same time, a significant number of respondents (11 individuals) stated that they would not make any investment, mainly due to age or reduced engagement in agricultural activities, indicating a gradual shift away from active farming among a portion of the population.

When all sections are considered together, the findings indicate that the main investment priorities across the project area center on land expansion, irrigation infrastructure, and productivity enhancement.

While Section 1 reflects a more diversified investment profile, including mechanization, greenhouse production, and livestock activities, Section 3 highlights a stronger emphasis on irrigation improvements and land expansion, alongside input-based productivity investments. In contrast, Section 2 presents very limited and small-scale investment intentions, mainly focused on crop diversification and land-related strategies.

Across all sections, the results suggest that improving water access and production capacity remains a key concern for farmers. At the same time, the presence of respondents interested in mechanization and livestock indicates a degree of diversification and transition toward more commercial or intensified agricultural practices.

However, a notable share of respondents—particularly in Section 3—reported that they would not make any investment, mainly due to age or reduced involvement in agriculture. In addition, the relatively low number of detailed responses compared to the total sample size suggests that findings should be interpreted with caution in terms of representativeness.

Overall, the findings indicate that agricultural investment behavior in the project area is shaped by a combination of resource constraints (especially water), the need to increase production scale, and varying levels of engagement in farming, with some households actively seeking expansion while others are gradually disengaging from agricultural activities.

This feedback offering critical insights on livelihood preferences and plans have been evaluated and feasible alternatives have been considered in the design of livelihood restoration packages, as presented in Chapter 8.

5.2.5.13. Support Needs and Requests for Other Landholdings

In response to questions about what types of support would help them increase income or reduce costs on other landholdings remaining unaffected by the Project, In Section 1, the responses reveal a diverse but strongly input-oriented support demand structure. A large proportion of respondents emphasized the need for agricultural input support, particularly seeds, seedlings, fertilizers, and fuel (diesel). These were among the most frequently mentioned needs, indicating that high input costs are a major constraint for sustaining and expanding agricultural production. In addition, several respondents highlighted the importance of irrigation-related support, including improvements to existing irrigation infrastructure, provision of irrigation equipment, and rehabilitation of old irrigation canals. One respondent also explicitly referred to the high cost of irrigation equipment (approximately TRY 1,000,000.00 with 2026 prices), pointing to significant financial barriers to such investments.

There is also a notable demand for training and capacity-building, with respondents expressing interest in education on good agricultural practices, vegetable production, and alternative crops. This is complemented by requests for crop diversification support, including guidance and inputs for cultivating alternative or higher-value crops, as well as fodder crops.

Some respondents further indicated the need for financial support mechanisms, such as subsidized credit, product-based subsidies, and assistance for reducing input costs. A smaller number of responses also pointed to mechanization and equipment support, as well as land-related support, including land rental or access to suitable agricultural land.

At the same time, at least one respondent stated that they had no specific opinion, suggesting that not all households have clearly defined support expectations.

Overall, the findings indicate that farmers in Section 1 primarily require cost-reducing, input-based, and infrastructure-oriented support, complemented by training and diversification opportunities. This reflects a production system under input cost pressure, where both financial and technical support could significantly enhance agricultural productivity and sustainability.

In Section 2, when respondents were asked about additional support that could help increase agricultural income or reduce production costs on their unaffected land, the responses indicate a clear demand for input-based agricultural support.

Households primarily emphasized the need for seed and fertilizer support, along with broader agricultural production inputs, highlighting the importance of reducing input costs in sustaining farming activities. In addition, some respondents expressed interest in support for alternative crops, including guidance on crop selection and assistance in transitioning to more suitable or profitable production types.

Overall, the findings suggest that farmers in Section 2 require relatively basic and targeted agricultural support, particularly focused on improving productivity and reducing input costs, rather than large-scale investments. This reflects the small number of livestock-owning or actively farming households in the section and indicates a more limited but practical support need structure.

in Section 3, the responses indicate that the most critical support need among affected households is access to agricultural inputs, with 28 respondents requesting support for seeds, fertilizers, fuel, and other key inputs. This highlights the significant cost pressures faced by farmers and their impact on agricultural productivity.

Improving irrigation infrastructure represents the second most frequently identified need, with 12 respondents emphasizing the importance of water access through wells, drilling, or irrigation systems. In addition, 10 respondents highlighted the need for agricultural training and capacity-building, particularly in relation to good agricultural practices.

Support related to livestock activities and fodder production was also noted, alongside requests for alternative crop development and limited demand for machinery and infrastructure improvements. Overall, the findings suggest that both financial (input-related) and technical (knowledge and irrigation) support mechanisms are essential to enhance agricultural productivity and resilience in the project area.

When all sections are considered together, the findings indicate that the dominant support need across the project area is agricultural input support, particularly for seeds, fertilizers, and fuel, reflecting widespread cost pressures affecting production sustainability.

This is consistently followed by demand for irrigation-related investments, highlighting structural constraints related to water access and the importance of improving irrigation infrastructure to enhance productivity. In addition, there is a notable need for training and capacity-building, especially in good agricultural practices and crop diversification, indicating that farmers require not only financial support but also technical knowledge.

While Section 1 reflects a more diverse and investment-oriented demand structure, including mechanization, credit, and land-related support, Sections 2 and 3 point toward more basic, input-focused and productivity-driven needs, shaped by smaller-scale or less intensive agricultural activity.

Overall, the results suggest that agricultural production systems in the project area are primarily constrained by high input costs, limited irrigation capacity, and gaps in technical knowledge, and that an effective support strategy should combine input subsidies, irrigation improvements, and targeted training programs to strengthen both productivity and resilience.

This feedback offering critical insights on livelihood preferences and plans have been evaluated and feasible alternatives have been considered in the design of livelihood restoration packages, as presented in Chapter 8.

5.2.5.14. Sources of Information on Local Land Sales

As shown in Table 5-59, in Section 1, the majority of households (112 out of 173, 64.7%) rely on acquaintances as their primary source of information regarding land sales in the neighbourhood. This indicates a strong dependence on informal social networks for accessing market-related information. Other sources, while less common, include real estate offices (50 households, 28.9%), the village head (mukhtar) (18 households, 10.4%), and the internet (17 households, 9.8%). A very small number of households reported obtaining information through media (press) (1 household, 0.6%), while no respondents indicated landowners as a source. The relatively higher use of real estate offices compared to other sections suggests a partially developed linkage to formal market channels, although informal networks remain dominant.

In Section 2, almost all households (16 out of 17, 94.1%) rely on acquaintances as their primary source of information regarding land sales. Only a very small proportion reported using real estate offices (2 households, 11.8%), while no households indicated the use of the internet, village head (mukhtar), media, or landowners as information sources. This overwhelming reliance on acquaintances indicates that land-related information in Section 2 is obtained almost exclusively through informal social networks, reflecting a very limited presence of formal or digital market channels in the area.

In Section 3, the majority of households (70 out of 84, 83.3%) rely on acquaintances as their primary source of information regarding land sales in the neighbourhood. This indicates a strong dependence on informal social networks for market-related knowledge. Other sources, while significantly less common, include the internet (15 households, 17.6%), the village head (mukhtar) (12 households, 14.1%), and real estate offices (5 households, 5.9%). A very small number of households reported receiving such information through traditional media (press) (1 household, 1.2%) or directly from landowners (1 household, 1.2%). The low percentage of households relying on real estate offices indicates limited use of formal market intermediaries.

Across all sections, the majority of households (198 out of 274, 72.4%) rely on acquaintances as their primary source of information regarding land sales in the neighbourhood. This clearly indicates a strong dependence on informal social networks for accessing land market information. Other sources remain significantly less common. Real estate offices are used by 57 households (20.8%), suggesting a limited but notable role of formal intermediaries in the land market. Similarly, internet (32 households, 11.7%) and village heads (mukhtar) (30 households, 11.0%) serve as secondary sources of information. Only a very small number of respondents reported obtaining information through media (2 households, 0.7%) or directly from landowners (1 household, 0.4%), indicating that these channels play a negligible role in the local land information system.

Overall, the findings demonstrate that the land market in the project area is predominantly informal, with limited reliance on formal or digital information channels. This suggests potential constraints in market transparency and accessibility, which may affect informed decision-making among land users.

Table 5-59. Sources of Information on Land Sales in the Neighbourhood

Section	Sources of Information on Sales in the Neighbourhood	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Acquaintances**	112	64.7
	Internet	17	9.8
	Village Head (Mukhtar)	18	10.4
	Real Estate Offices	50	28.9
	Landowners	0	0.0
	Media (Press)	1	0.6
	Total (n=173, multiple responses allowed)	--	--
Section 2 (KM 35-70)	**Acquaintances**	16	94.1
	Internet	0	0.0
	Village Head (Mukhtar)	0	0.0
	Real Estate Offices	2	11.8
	Landowners	0	0.0
	Media (Press)	0	0.0
	Total (n=17, multiple responses allowed)	--	--
Section 3 (KM 70-105)	**Acquaintances**	70	82.4
	Internet	15	17.6
	Village Head (Mukhtar)	12	14.1
	Real Estate Offices	5	5.9
	Landowners	1	1.2
	Media (Press)	1	1.2
	Total (n=84, multiple responses allowed)	--	--
All Sections	**Acquaintances**	198	72.4
	Internet	32	11.7
	Village Head (Mukhtar)	30	11.0
	Real Estate Offices	57	20.8
	Landowners	1	0.4
	Media (Press)	2	0.7
	Total (n=274, multiple responses allowed)	--	--

Source: RAP Field Surveys (February – March 2026).

As shown in below table, in Section 1, the vast majority of households (157 out of 173, 90.8%) prefer to purchase land directly from landowners, indicating a strong reliance on informal transaction practices. Only a small proportion of respondents (11 households, 6.4%) reported using real estate offices, while an even smaller group (3 households, 1.7%) indicated that they use both methods. The very limited use of intermediaries suggests that land transactions in Section 1 are predominantly conducted through direct, trust-based relationships, rather than formal market channels. This finding is consistent with the strong reliance on acquaintances as information sources observed in the same section. Overall, the results indicate that the land market in Section 1 is largely informal, with minimal engagement with professional intermediaries, reflecting both social trust dynamics and limited formal market integration.

In Section 2, the vast majority of households (16 out of 17, 94.1%) prefer to purchase land directly from landowners, while only a very small proportion (1 household, 5.9%) indicated a preference for using real estate offices. This overwhelming preference for direct transactions suggests that land acquisition practices in Section 2 are highly informal, with minimal reliance on intermediaries. The limited role of real estate agents further indicates a low level of formal market engagement, consistent with the strong dependence on social networks observed in information sources.

In Section 3, the vast majority of surveyed households (79 out of 84, 94.0%) reported preference for acquiring their land directly from the landowner. This indicates a strong preference for direct, person-to-person transactions in the local context. Only 2 households (2.4%) prefer acquiring land through both real estate offices and directly from the landowner. Three households (3.6%) did not provide a response. The predominance of direct transactions reinforces the informal nature of land markets in the area and aligns with previously observed patterns of limited reliance on formal market channels or intermediaries.

Across all sections, the vast majority of households (252 out of 274, 92.0%) prefer to purchase land directly from landowners, clearly indicating that land transactions in the project area are predominantly conducted through

informal, direct arrangements. No households reported using real estate offices, while a very small share (4 households, 1.5%) indicated that they use both direct and intermediary channels. A small number of respondents (12 households, 4.4%) did not provide a response.

Overall, the findings demonstrate that the land market in the project area is highly informal and weakly mediated, with minimal reliance on professional intermediaries. This pattern is consistent with the previously observed strong dependence on acquaintance-based information channels, suggesting that both information flow and transaction practices are largely embedded in local social networks.

Table 5-60. Preferred Method for Purchasing Land

Section	Method	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Directly from landowner**	157	90.8
	Real Estate Offices	11	6.4
	Directly from landowner + Real Estate Offices	3	1.7
	No response	2	1.2
	Total	**173**	**100**
Section 2 (KM 35-70)	**Directly from landowner**	16	94.1
	Real Estate Offices	1	5.9
	Directly from landowner + Real Estate Offices	0	0.0
	No response	0	0.0
	Total	**17**	**100**
Section 3 (KM 70-105)	**Directly from landowner**	79	94.0
	Real Estate Offices	0	
	Directly from landowner + Real Estate Offices	2	2.4
	No response	3	3.6
	Total	**84**	**100**
All Sections	**Directly from landowner**	252	92.0
	Real Estate Offices	0	
	Directly from landowner + Real Estate Offices	4	1.5
	No response	12	4.4
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.15. Project Awareness

As presented in table below, in Section 1, the majority of surveyed households (153 out of 173, 88.4%) reported that they were aware of the Motorway project prior to the commencement of the RAP surveys. A smaller proportion (16 households, 9.2%) indicated that they were not aware of the project, while 4 households (2.3%) did not provide a response. The findings suggest that, although awareness levels are relatively high in this section, there remains a notable minority of households who were not informed, indicating some gaps in information dissemination. This may reflect differences in access to communication channels or varying levels of engagement with local information networks.

In Section 2, all surveyed households (17 out of 17, 100%) reported that they were aware of the Motorway project prior to the RAP surveys. This indicates a full level of awareness within the section, suggesting that information regarding the project has been effectively disseminated among the local population. The absence of any negative or missing responses reflects a high level of communication reach and community awareness.

In Section 3, all of the surveyed households (84 out of 84, 100%) reported that they were aware of the Motorway project prior to the commencement of the RAP surveys.

Across all sections, a large majority of households (254 out of 274, 92.7%) reported being aware of the Motorway project prior to the RAP surveys. However, 16 households (5.8%) stated that they were not aware, and 4 households (1.5%) did not provide a response.

Overall, the findings indicate that awareness of the project is high across the project area, although not entirely universal. The presence of a small but notable group of uninformed households suggests that while information dissemination has been largely effective, there is still room for improvement in ensuring comprehensive outreach and inclusiveness, particularly for harder-to-reach or less-connected groups.

The responses regarding information sources about the Project indicate that information flow is predominantly driven by local and informal channels, with the village head (mukhtar) emerging as the most frequently mentioned source. A large number of respondents reported receiving information directly from the mukhtar, highlighting the central role of local leadership in disseminating project-related information within the community.

In addition to the mukhtar, informal social networks—including neighbours, relatives, acquaintances, and the broader village community—constitute another major source of information. Many respondents indicated that they learned about the Project through word-of-mouth communication, reflecting the continued importance of community-based information exchange mechanisms.

Formal and semi-formal channels were also mentioned, although to a lesser extent. These include official institutions such as KGM (General Directorate of Highways), project-related meetings and consultations, and notifications or official documents (tebligat). Such channels suggest that structured information dissemination mechanisms were present but did not reach all households equally.

Other sources, mentioned by a smaller number of respondents, include media (press), internet, and social media, as well as field-based interactions such as land measurements, surveys, and direct contact with project staff, engineers, or company representatives. In some cases, respondents also referred to NGOs and project-related organizations (e.g., SÜRKAL) and local institutions such as municipalities or cooperatives.

Overall, the findings indicate that while both formal and informal channels contribute to information dissemination, the process is largely dominated by local, interpersonal, and experience-based communication pathways. This suggests that project-related information is primarily transmitted through trusted local networks, with formal channels playing a complementary but less pervasive role.

Table 5-61. Awareness of the Motorway Project before RAP Surveys

Section	Response	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Yes**	153	88.4
	No	16	9.2
	No response	4	2.3
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes**	17	100
	No	0	0
	No response	0	0
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes**	84	100
	No	0	0
	No response	0	0
	Total	**84**	**100**
All Sections	**Yes**	254	92.7
	No	16	5.8
	No response	4	1.5
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

As shown in Table 5-62, in Section 1, awareness of the specific route details of the Motorway project is moderate but not widespread. A total of 73 households (42.2%) reported that they were aware of the route alignment, while a larger share, 96 households (55.5%), indicated that they had no knowledge of the route details. A small number of respondents (4 households, 2.3%) did not provide a response. These findings suggest that although general

awareness of the project exists in this section, detailed knowledge about the route remains limited, indicating gaps in the depth of information reaching affected households.

In Section 2, awareness of the route details is significantly lower compared to other sections. Only 3 households (17.6%) reported being aware of the route alignment, while a clear majority, 14 households (82.4%), stated that they had no knowledge of it. No respondents were recorded under the "no response" category. This indicates that despite full awareness of the project itself in this section, detailed and technical information regarding the route has not been effectively disseminated, pointing to a strong reliance on limited or indirect information channels.

In Section 3, while overall awareness of the Motorway project was high, detailed knowledge about the route remains relatively limited among the affected population. Only 30 households (35.7%) reported being aware of the specific route details, whereas the majority – 52 households (61.9%) – indicated they had no knowledge of the route alignment. Two households (2.4%) did not provide a response.

Across all sections, the findings demonstrate that while overall awareness of the Motorway project is high, knowledge of the specific route alignment remains relatively low. In total, 106 households (38.7%) reported being aware of the route details, whereas the majority, 162 households (59.1%), indicated that they had no knowledge. A small proportion (6 households, 2.2%) did not provide a response.

Overall, the results highlight a clear distinction between general project awareness and detailed project understanding, suggesting that while information about the project has reached most households, more targeted and detailed communication efforts are needed to improve understanding of the route alignment among affected populations.

Table 5-62. Awareness of the Route Details

Section	Response	Number of Responses (Household)	Percentage (%)
Section 1 (KM 0-35)	**Yes**	73	42.2
	No	96	55.5
	No response	4	2.3
	Total	**173**	**100**
Section 2 (KM 35-70)	**Yes**	3	17.6
	No	14	82.4
	No response	0	0
	Total	**17**	**100**
Section 3 (KM 70-105)	**Yes**	30	35.7
	No	52	61.9
	No response	2	2.4
	Total	**84**	**100**
All Sections	**Yes**	106	38.7
	No	162	59.1
	No response	6	2.2
	Total	**274**	**100**

Source: RAP Field Surveys (February – March 2026).

5.2.5.16. Project Perception

In Section 1, positive perceptions of the Project are present but relatively limited and mostly concentrated around transportation-related benefits (approximately 25 respondents). A considerable number of respondents emphasized that the Project would facilitate transportation, improve access, and enhance connectivity between settlements. Statements such as "transport means civilization" and references to easier intercity travel indicate that improved mobility is perceived as the main benefit.

Some respondents also noted potential increases in land value and minor economic advantages (approximately 6 respondents), such as reduced travel costs. However, a notable portion of respondents explicitly stated that the Project would have no positive impact, or that they had no clear opinion, indicating that positive perceptions are not widespread and are often limited to general infrastructure improvements rather than direct livelihood gains.

In contrast, negative perceptions are highly dominant and strongly articulated. The most frequently mentioned concern is the loss of agricultural land (approximately 60 respondents), which is directly linked to declining income and livelihood insecurity. Many respondents emphasized that their fields and productive lands would be reduced, divided, or completely lost (approximately 20 respondents), leading to lower agricultural output and financial hardship.

Land fragmentation also emerged as a major issue. Respondents repeatedly stated that plots would be divided into smaller and less efficient units, making agricultural activities more difficult and, in some cases, economically unviable. This is closely associated with concerns about restricted access to remaining lands (approximately 15 respondent), with several respondents noting that reaching their fields would become more difficult due to the motorway alignment.

In addition, respondents highlighted environmental and ecological impacts, including noise, dust, air pollution, and disruption of the natural balance (around 10 respondents). Some also expressed concerns about increased population density and unplanned development, which could further pressure agricultural areas.

Beyond economic and environmental impacts, a number of responses reflect social and emotional dimensions, such as attachment to inherited land and the psychological distress associated with losing long-held properties.

Overall, the findings indicate that while some limited positive perceptions exist—primarily related to transportation and accessibility—negative perceptions are far more prevalent and detailed. These are largely driven by direct impacts on agriculture, land ownership, income, and environmental conditions, suggesting that the Project is perceived primarily through its consequences on household-level livelihoods rather than broader regional benefits.

In Section 2, positive perceptions of the Project are extremely limited. Only one respondent explicitly referred to a potential positive outcome, namely receiving cash compensation, while another stated that the Project would have no positive aspect for the household. Overall, this indicates that positive perceptions are either absent or confined to the expectation of short-term financial compensation, rather than any broader livelihood or welfare improvement.

By contrast, negative perceptions are more widespread and strongly expressed. Several respondents highlighted the loss of houses and disruption of established living arrangements, including concerns that households currently living together would be separated and that their settled order would be disturbed. A number of responses also emphasized economic concerns, particularly the risk that houses or land would be acquired below their real value, leading to financial hardship.

Loss of land and related livelihood impacts also emerged as a major concern. Respondents referred to the loss of fields, agricultural land, and trees, and linked this directly to declining income and reduced livelihood security. In addition, some participants noted that the Project would lead to land fragmentation and make access to remaining parcels more difficult, thereby further undermining agricultural use.

Environmental and residential concerns were also mentioned. One respondent whose house would remain near the motorway expressed anxiety about noise pollution and the future habitability of the dwelling during and after the Project.

Overall, the findings indicate that project perception in Section 2 is predominantly negative, with concerns centered on loss of housing, land, income, and residential stability. Positive perceptions are minimal and largely limited to compensation-related expectations, while negative perceptions are more concrete, diverse, and directly tied to household welfare and livelihood impacts.

In Section 3, the positive perceptions of the project are predominantly related to improvements in transportation and accessibility. A significant number of respondents (approximately 20 mentions) stated that the project would facilitate transportation, reduce travel time, and ease traffic congestion, both locally and at a broader scale. Some respondents (around 5 mentions) also highlighted that the project could increase the value of land and improve regional connectivity.

A smaller group (approximately 3 mentions) mentioned temporary economic benefits, such as increased business activity or short-term income opportunities during the construction phase. However, it is important to note that a considerable number of respondents (around 10 mentions) explicitly stated that the project would have no positive impact on their household or livelihood.

Overall, while positive perceptions exist, they are largely limited to broader infrastructure benefits, rather than direct improvements to household-level livelihoods.

The negative perceptions of the project are widespread and strongly expressed, primarily linked to loss of agricultural land and income. A large majority of respondents (approximately 50 mentions) indicated that the project would lead to land acquisition, reduction of agricultural land, and fragmentation of plots, which in turn would result in decreased productivity and income loss.

In addition, a significant number of households (around 30) reported concerns regarding restricted access to remaining lands, including difficulties in reaching fields, disrupted internal roads, and reduced usability of agricultural plots.

Environmental impacts were also frequently mentioned. Around 20 households expressed concerns about noise, dust, and environmental pollution, particularly during the construction phase. Furthermore, several respondents (approximately 10 mentions) highlighted the loss of pastures and water resources, which would negatively affect livestock activities.

A smaller but notable group (approximately 5 mentions) referred to social and psychological impacts, including stress, uncertainty, and emotional attachment to lost land.

Overall, the findings indicate that negative perceptions are primarily driven by direct impacts on livelihoods, especially agriculture, and are both more frequent and more strongly articulated than positive perceptions.

5.2.5.17. Focus Group Discussions with Animal Breeders

As presented in Section 3.1.1.1, expropriation plans identify that pasture parcels are affected in Seymen (nearly 10 da) and Çeşmeli (nearly 85 da) in Section 1, Kayı (less than 1 da) and Yağcı (nearly 4.4 da) in Section 2, and Seymenli (nearly 135 da), Güveçli (nearly 23 da), Nusratfakı (nearly 60 da) and İnecik (nearly 8 da) in Section 3.

The key informant meetings and land user identification studies conducted as part of the RAP also identified the settlements with potential impacts on livestock activities and the potentially affected users and associated sensitivities. Accordingly, as part of the RAP field surveys, focus group discussions were held with the animal breeders in the following settlements:

- **Section 1 (KM 0 – 35):** Marmaraereğlisi district, **Çeşmeli** neighbourhood
- **Section 3 (KM 70 – 105):** Süleymanpaşa district**, İnecik and Seymenli** neighborhoods

The meetings were organised with the coordination of neighbourhood headmen and included active livestock producers. The discussions were conducted in an informal conversational format, allowing for detailed exploration of current conditions, pasture use practices, and perceptions of the Project.

Table 5-63 provides a summary of the key findings.

Table 5-63. Summary of Focus Group Discussion with the Affected Animal Breeders

Participant PAPs	Key Findings of the Focus Group Discussions
Section 1 **Çeşmeli:** **2 producers (both male)**	• Both participants stated that livestock activities are at potential risk due to the direct or indirect **impacts of the Project on pasture areas**. • **First participant from Türkmenli neighbourhood:** o He indicated that their enterprise is located within the boundaries of Türkmenli Neighbourhood, while the pasture area they use is located within Çeşmeli. The enterprise has 1,060 bovines (Angus breed, raised for fattening purposes) and approximately 50 ovines. While bovines are not grazed on pasture, ovines are grazed between April and November. Grazing activities are carried out by shepherds, with associated costs ranging between TRY 40,000 and 60,000 (with 2026 prices). o The participant stated that **liquid manure** is occasionally applied to certain parts of the pasture, resulting in increased productivity in those areas, although such practices may be subject to regulatory limitations. o It was emphasized that if approximately 10% of the pasture area is lost due to the project, this would lead to a significant loss of grazing land. As the enterprise does not have access to

Participant PAPs	Key Findings of the Focus Group Discussions
	alternative pasture areas, this loss would directly affect production capacity. The participant noted that continued loss of pasture could render livestock activities unsustainable. ○ **Alternative forage production** options have been considered; however, these are associated with high costs. Land rental prices range between TRY 1,500 and 2,000 per decare (with 2026 prices), and crops such as barley, wheat, ryegrass, and maize are cultivated. Nevertheless, it was stated that pasture loss cannot be fully compensated through these alternatives. ○ The enterprise imports livestock from abroad, as domestic animal movement restrictions limit procurement from eastern regions of the country. The enterprise is licensed and operates as a model facility, and feed supply is supported through an affiliated company with its own feed production capacity. ○ The participant emphasized that, within the project scope, it is critical to maintain existing access roads, control dust and noise during construction, and ensure that grazing and shepherding activities are not disrupted. Otherwise, production would be significantly affected. • **Second participant from Çeşmeli neighbourhood:** ○ He stated that, although they do not experience direct land acquisition impacts, they are indirectly affected due to the impact on pasture areas. ○ Their enterprise includes 350 bovines, 50–60 Jersey dairy cows, approximately 300 animals raised for sacrifice and heifers, and around 900 ovines. Most ovines are raised for breeding and sacrificial (*kurbanlık*) purposes. ○ **Milk production is carried out**, with an average daily yield of approximately 10 litres per cow. The milk is sold both wholesale to a dairy processor in Istanbul and directly to individual customers. ○ The participant indicated that ovines are grazed between April/May (depending on weather conditions) and December, while bovines benefit from pasture between May and November. It was noted that pasture quality is low and that there is no water source available. ○ The enterprise employs **shepherds**, with costs of approximately TRY 40,000 for an Afghan shepherd and around TRY 55,000 a more experienced one (with 2026 prices). ○ It was emphasized that **fragmentation** of pasture areas would disrupt livestock movement, block access routes, and particularly make ovine production unsustainable. ○ The participant stated that a mixed feeding system is used, including on-farm production of barley and wheat, the use of feed mixing machinery, and procurement of commercial feed. Feed inputs include alfalfa, straw, barley, wheat, and concentrated feed. ○ Livestock production was described as highly cost-intensive, with feed and labour (shepherd) costs representing major expenses, while income levels remain relatively limited. ○ To mitigate pasture loss, the participant suggested the provision of alternative forage production areas, pasture rehabilitation, sowing of forage crops, and the establishment of water sources through drilling. It was also noted that post-harvest crop residues could be utilized for grazing by ovines. ○ In terms of marketing, ovines are primarily sold directly to consumers as sacrificial animals, while bovines are sold using a share-based system. ○ Overall, participants emphasized that the loss and fragmentation of pasture areas constitute the most critical risk for the sustainability of livestock activities. In particular, impacts on access, grazing patterns, and feed costs are expected to have direct and significant consequences on production.
<u>Section 3</u> **İnecik:** **10 producers** **Seymenler:** **8 producers**	○ In **İnecik**, 19 households are engaged in livestock production, mostly in bovines farming, with some involvement in ovine production. The total livestock population is approximately 300 bovines and 2,000 ovines. ○ In **Seymenler**, 10 households are engaged in livestock production, with 223 bovines and 220 ovines. ○ In both neighborhoods, production is largely **pasture-based**. Bovines utilise pastures for approximately seven months per year, while ovines rely on pasture for most of the year. ○ **Shepherd costs** in ovine production were reported to be around TRY 45,000–50,000 (with 2026 prices) per month.

Participant PAPs	Key Findings of the Focus Group Discussions
	○ One of the most critical issues raised during the discussions was **pasture loss**. It was stated that approximately 64 decares of pasture in İnecik and 135 decares in Seymenler would be lost due to the Project, and that the remaining pasture areas would be insufficient to support the current livestock population. Producers emphasized that pastures are not only a source of feed but also essential for water access and free movement of animals. ○ **Water resources** emerged as the most critical concern in both neighborhoods. In İnecik, the animal drinking water source located in an area known as "Beylik Çayırı" is expected to be affected by the Project, raising significant concerns. Participants strongly opposed the use of this area as a fill site and stressed the need to protect the water source or develop an alternative solution. Similarly, in Seymenler, it was stated that existing water sources would fall within the motorway alignment, negatively affecting both livestock and agricultural activities. ○ **Access to pastures** was another major concern. If the motorway creates a barrier between settlements and pasture areas, and if sufficient crossing structures are not provided, the pastures would effectively become unusable. Producers emphasized that adequate and accessible crossing points are critical for the sustainability of livestock activities. Additionally, it was noted that the most productive and shaded areas of the pastures would be affected by the project, while the remaining areas would be insufficient in both quality and capacity. ○ Producers proposed several mitigation measures, including the protection of existing water sources or the establishment of new water supply systems (e.g., wells and solar-powered systems), support for forage crop production, pasture rehabilitation, and the provision of alternative pasture areas. They also emphasized the need to strengthen veterinary services and provide practical livestock training. In Seymenler, the use of municipal lands for forage production or the establishment of artificial pastures was also suggested. ○ Overall, the discussions demonstrated that pasture loss should not be considered solely as a reduction in land area, but as a complex impact involving water resources, access, and feed supply. Ensuring water availability and maintaining access to pastures are critical for the sustainability of livestock activities. While a higher level of concern and potential social sensitivity was observed in İnecik, a relatively more moderate approach was noted in Seymenler. However, in both neighborhoods, it was clearly stated that without appropriate mitigation measures, livestock activities would be significantly adversely affected.

Source: RAP Field Surveys (February – March 2026).

5.2.6. Physically Displaced Businesses

Key information on affected businesses – including their operational characteristics and number of employees – is presented in Section 3.4.

The following sections present data collected from affected businesses during RAP surveys held in February and March 2026 to identify the impact categories and inform the design of entitlements –such as relocation packages, moving allowances, and livelihood restoration measures. However, it is important to note that these findings are based solely on self-declarations provided by business owners during the survey. During the RAP implementation phase, each business will be assessed individually by the SPV, with support from qualified experts and as necessary third-party consultants, through official documentation review and in-depth consultations. Business-specific implementation plans will be developed accordingly, tailored to the unique characteristics and needs of each enterprise.

5.2.6.1. Relocation Challenges

The following assessment is based on responses from **fo**ur project-affected businesses**,** including three in Section 1 and one in Section 2**,** and presents a structured analysis of relocation-related considerations by question type.

The responses from the four affected businesses indicate that relocation is associated with a range of operational, financial, and administrative challenges, which can be summarized as follows:

- **Relocation Need:** Out of the four businesses, one business will be required to relocate due to direct impacts such as road closure and complete loss of land. One business indicated that relocation will depend on whether access and entry/exit points to the premises are affected by the Project; if access is maintained, the business intends to continue operating at its current location. The remaining two businesses indicated that they may continue operating at their current location subject to certain conditions, particularly the maintenance of access, road connectivity, and operational functionality
- **Regulatory and Administrative Burdens:** 3 out of 4 businesses indicated that relocation would require the renewal of permits and licenses, including business operation licenses, environmental permits, fire safety approvals, and electricity connection authorizations. In some cases, these processes are expected to take several months (up to 6–8 months) and may involve significant costs, particularly for technical infrastructure such as electricity connections. This highlights the substantial administrative burden associated with relocation.
- **Operational Disruption and Income Loss:** Businesses anticipate temporary suspension of operations during the relocation process, with some estimating downtime of up to six months. This interruption is expected to lead to production losses and reduced income, particularly for businesses that rely on continuous operations. In addition, one business emphasized that relocation could significantly disrupt production due to the complexity of moving specialized machinery.
- **Customer and Market Loss:** Several businesses expressed concerns that relocation could result in loss of customers, especially if the new location is less accessible or further away from their current customer base. Reduced accessibility and changes in location are expected to negatively affect business continuity and market presence.
- **Re-establishment Costs:** All respondents highlighted that relocation would involve substantial financial costs, including rent, transportation, and administrative expenses. Estimated costs vary widely, ranging from approximately TRY 4 million to 35 million (with 2026 prices), depending on the scale of the business and the technical requirements. Additional costs such as equipment relocation, infrastructure setup, and compliance with regulatory requirements further increase the financial burden.
- **Labour-Related Risks:** Businesses expressed concerns about their ability to retain employees after relocation. Since many employees reside near the current location, relocation—particularly to more distant areas – may lead to workforce loss, as employees may be unwilling or unable to commute. This creates risks for operational continuity.
- **Uncertainty:** A significant level of uncertainty was observed among business owners regarding the relocation process. Concerns include difficulty in finding suitable alternative locations, lack of clarity on administrative procedures, and the overall feasibility of relocation. In particular, businesses requiring large plots, specific infrastructure, or specialized equipment reported high levels of uncertainty and concern.

5.2.6.2. Relocation Expenses

All respondents highlighted that relocation would involve substantial financial costs, including rent, transportation, and administrative expenses. Estimated costs vary widely, ranging from approximately TY 4 million to 35 million (with 2026 prices), depending on the scale of the business and the technical requirements. Additional costs such as equipment relocation, infrastructure setup, and compliance with regulatory requirements further increase the financial burden.

Monetary estimates shared by the respondents, depending on the scale and nature of their businesses, have been taken into account in the calculation of the RAP Fund.

5.2.6.3. Relocation Support Needs and Special Requirements

The responses regarding support needs for relocation and re-establishment indicate that affected businesses require both financial and operational assistance, as well as early and structured planning support.

- A key issue raised by multiple businesses is the need for advance notification. Respondents emphasized that they should be informed at least 3–5 months in advance to adequately prepare for relocation, secure alternative sites, and manage administrative processes. Early communication is also considered critical to mitigate disruptions during the construction phase, particularly in relation to access restrictions (entry/exit constraints).
- Financial support is another major concern. Businesses highlighted the need for assistance to cover relocation costs, permit and licensing expenses, and potential income losses during business interruption. Several respondents noted that relocation would result in temporary closure periods ranging from 2–3 months up to 6 months, during which they would not be able to operate, leading to significant financial strain.
- Operational challenges were also emphasized. Businesses indicated that relocation would require professional support services, particularly for logistics, installation, and re-establishment of operations. Ensuring continued access to the existing business location during construction was identified as a critical factor in minimizing disruption.
- A particularly critical case is the business that will be fully displaced, identified as a marble processing facility. This business highlighted that relocation would be highly complex and technically demanding, due to the presence of specialized and high-value machinery. The relocation process would require:
    - A large and suitable replacement site
    - Specific infrastructure, including 4-phase electricity, and
    - Specialized transport and technical teams, potentially involving international expertise
- The business also emphasized that the relocation of such machinery involves high costs and significant operational risk and expressed a preference to avoid relocation altogether if possible. This case represents a high-impact displacement scenario, where standard relocation support may be insufficient without tailored technical and financial assistance.

5.2.6.4. Fixed Investments and Infrastructural Improvements done at the Affected Premises

The responses indicate that most businesses have made significant fixed investments to improve their operational facilities, while a smaller number reported no such investments.

Several respondents confirmed investments in basic structural improvements, such as building modifications (e.g., enclosed working areas)

More notably, one business reported substantial investments in machinery and technical infrastructure, including CNC machines, press equipment, portal cranes, ventilation systems, and water and electricity installations.

Other investments such as cameras, and security systems, purchased by the operators are mostly movable items and not considered fixed investments.

5.2.6.5. Licensing and Regulatory Renewal Requirements

The responses from two businesses indicate that specific permits and licenses are required for the continuation of operations, and that obtaining these approvals can be time-consuming and uncertain.

Reported permits include workplace operation licenses, fire safety approvals, and environmental permits. While one business was unable to specify the duration of these processes, another indicated that obtaining a municipal workplace license may take up to 8 months.

5.2.6.6. **Relocation Preferences**

In the context of the RAP field surveys, consultations were conducted with affected business owners to understand their preferences and intentions regarding relocation.

Out of the four businesses, one business will be required to relocate due to direct impacts such as road closure and complete loss of land. One business indicated that relocation will depend on whether access and entry/exit points to the premises are affected by the Project; if access is maintained, the business intends to continue operating at its current location. The remaining two businesses indicated that they may continue operating at their current location subject to certain conditions, particularly the maintenance of access, road connectivity, and operational functionality

6. Valuation and Compensation Methodology

6.1. Key Compensation and Assistance Principles

The land acquisition process for the Project is being carried out by KGM in accordance with the principles and procedures defined under the Expropriation Law (Law No. 2942, 1983) and other applicable legislation, with official expropriation procedures commencing in 2024 in Section 4.

The status of land acquisition is presented in Section 2.6.

Key gaps between national legislation and international standards – particularly in areas such as depreciation for structures, resettlement planning, compensation for displacement impacts, livelihood restoration and assistance, stakeholder engagement, grievance management, and the consideration of vulnerable groups and gender aspects – are outlined in Section 4.4.

The key compensation and assistance principles to be adopted and implemented under the Project to ensure that land acquisition processes comply with international standards and the Lenders' requirements – specifically IFC PS5 – are summarised below.

- Avoidance and Minimisation of Displacement:

KGM has made efforts to avoid and minimise land acquisition and expropriation to the extent feasible during the route selection process, in order to reduce the Project's socio-economic impacts and minimise expropriation-related costs, as summarised in Table 2-24.

During the Project implementation phase, further avoidance or minimisation of displacement impacts may be achieved through the following mechanisms, as outlined in Section 2.8.

- Avoidance of Forced Eviction[84]:

The Project will not carry out forced evictions except in accordance with national legislation and the requirements of IFC PS5.

For parcels where access rights have been secured by the Project through Article 8, 10, or 27 of the Expropriation Law, whichever is applicable, evacuation of expropriated lands and assets will be requested by the SPV and carried out by the KGM in compliance with **Article 20 of the Expropriation Law**, following the completion of the expropriation process.

The principles and the procedure to be followed for avoiding forced eviction and managing the eviction process in compliance with IFC PS5 and requirements of Lenders are outlined in Section 6.4**.**

- Prioritisation of Purchase through Negotiated Settlement over Expropriation:

Although Accelerated Expropriation Decisions have been issued by the President of Türkiye in accordance with the Expropriation Law, **KGM has prioritised negotiated settlements through Article 8** (purchase method) under this Project. As part of this process, owners and shareholders, including rightful heirs, are formally notified by KGM and invited to in-person negotiations based on valuations conducted in line with the Expropriation Law.

To inform owners, shareholders, and heirs about the land acquisition process, their legal rights under the Expropriation Law, and the actions required before negotiation meetings – such as completing inheritance and succession procedures[85] – the SPV will distribute printed copies of KGM's informational booklet on the procedural steps of expropriation in all affected settlements (Appendix I) as part of RAP implementation.

[84] According to IFC PS5, forced eviction is "*the permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection*".
[85] Official notifications (invitations to negotiation meetings) sent to owners and shareholders by KGM, in accordance with Article 8 of the Expropriation Law, explicitly require that inheritance and succession procedures be completed and that inheritance certificates ("*veraset/mirasçılık belgesi*") be obtained prior to attending the negotiation meetings.

The distribution will continue in line with the Project's expropriation and construction schedules. This initiative aims to help prepare affected persons for the upcoming negotiation meetings and to increase participation, consent and title deed transaction rates to the extent possible.

- Proceeding with Article 27 Court Procedures only after Effective Consultations and Support Measures have been Undertaken:

If there is an urgent need for land entry, KGM will proceed with expropriation through Article 27 under the following conditions:

  - Owners and shareholder have been consulted and informed of their rights under the Expropriation Law.
  - Landowners have been formally invited to engage in negotiated settlements under **Article 8** of the Law, but no agreement was reached.
  - **Article 27** will apply only after all shareholders and heirs of deceased owners have been identified and invited to participate in negotiation meetings.
  - Following an Article 27 court decision, the SPV will confirm to the extent possible that shareholders have access to their compensation **prior to land entry**.

To ensure shareholders can access the compensation after Article 27 court decision before land access right is used by the SPV, the SPV will assist the heirs of affected parcels in obtaining their inheritance certificates from the nearest notary, as needed. Where necessary, the SPV will also provide logistical support, including travel assistance, and cover associated notary and transportation fees through the RAP Fund.

- Compensation at Full Replacement Cost:

All compensation to people affected by land acquisition will be provided at **full replacement cost**[86]. This includes market value plus any applicable transaction costs[87], as required by Lenders.

As the Project progresses, **KGM will update the valuation rates for land and other assets at least on an annual basis,** as needed depending on the expropriation schedule, to ensure that the expropriation prices offered to eligible individuals reflect current market values.

To achieve full replacement cost for these structures, the **SPV will establish and manage a RAP Fund,** from which it will provide the following compensation:

  - Depreciation: In accordance with the Expropriation Law, **depreciation is deducted** for buildings and structures (e.g., houses, barns, sheds, among other structures) based on the official ratios published in the relevant Turkish legislation. If the full replacement cost is not achieved after the deduction of depreciation, the amount corresponding to the deducted depreciation or the gap between the full replacement cost and the paid amount will be paid to eligible individuals by the SPV through the RAP Fund as additional top-up payments.
  - Compensation for Informal Users on state-owned lands other than forest and pasture lands: Those occupying land without legal title – who own structures on titled or ownerless land – are eligible for compensation under **Article 19** of the Expropriation Law. Accordingly, KGM is required to provide compensation based on **minimum material cost** ("*asgari levazim bedeli*") to individuals who can demonstrate ownership of structures, even in cases where the underlying land is not titled or the claimant does not hold legal ownership of the land. KGM may, at its sole discretion, pay the market value of the affected asset.

[86] According to IFC PS5, "*Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow Affected Communities and persons to replace lost assets with assets of similar value*".
[87] Such as registration, taxes, time lost, cost of transport.

The difference between the minimum material cost and full replacement cost for the affected structures, if any, will be provided to eligible people by the SPV as additional top-up payments from the RAP Fund. No compensation will be provided for the land itself.

According to KÖSOB, for Article 19 cases, coordination is carried out with the relevant public institutions on a case-by-case basis for compensation related to assets located on state-owned parcels. In the event that such parcels are used by individuals, the opinion of the relevant institution would be obtained prior to any compensation payment. Where users are able to document possession rights, compensation may be paid accordingly, including compensation for trees, even in forest areas. To date, no such cases have been identified along the current Project alignment, and therefore no related payments are envisaged.

- Compensation for Informal Users on forest and pasture lands: Informal users of **forest and pasture** lands are considered as illegal occupants ("*isgalci*") and are not entitled to any form of legal compensation for either the land or the assets under national legislation.

  The structures, trees and crops of these illegal occupants will be compensated by the SPV at full replacement cost. No compensation will be provided for the land itself.

- Crop payments:

According to the Expropriation Law, in the case of cultivated land, evacuation is postponed until after harvest; if waiting for the harvest is not feasible, the expropriating authority may request evacuation of the land by compensating the crop value, as determined by the court.

In practice, KGM can delay land entry until the end of the harvesting period. However, if land entry is urgently required by the SPV/EPC Contractor before the harvesting season, the SPV/EPC Contractor accessing the land will provide compensation for the crops from the RAP Fund, in accordance with the Expropriation Law.

- Livelihood Restoration and Assistance in addition to cash compensation:

The SPV will provide livelihood restoration and assistance measures to eligible affected people, including owners and users of affected houses, businesses and lands, as well as their formal and informal users, in accordance with the requirements of the Lenders.

Details of the livelihood restoration and assistance package options tailored to different impact categories are provided in Chapter 8.

- Disclosure and Consultation:

The final RPF, following the review and approval of the Project's Lenders and the LESA on 16 December 2025, has been disclosed by the SPV on the Project website in Turkish and English[88].

Upon its finalisation, this RAP will also be publicly disclosed through methods appropriate to the local context.

A non-technical summary of entitlements and procedures will be provided to all people affected by Project-related land acquisition in the form of a **GLAC** following the completion of draft RAP.

The GLAC has been prepared by the Project in Q2 2026. Once finalised and approved by the Lenders and the LESA, the **GLAC will be distributed to the mukhtars and affected people** in affected communities to enhance their understanding of the process and to support effective RAP implementation. The distribution of the approved version to the settlement heads and PAPs is anticipated to commence in Q3 2026.

The SPV has started engaging with the affected people regarding the expropriation process, and this engagement will continue through a combination of community meetings and face-to-face consultations throughout the RAP implementation as outlined in Chapter 10.

[88] https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-kinali-malkara-otoyolu-yeniden-yerlesim-politikasi-cercevesi.pdf; https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-kinali-malkara-motorway-resettlement-policy-framework.pdf

- Grievance Management:

The Project will establish and implement a fair, transparent, and efficient grievance management mechanism to address any compensation-related or other grievances raised by affected people, as described in Chapter 11.

- Consideration of Vulnerable Groups:

The SPV will pay specific attention to vulnerable individuals, who will be identified and supported through tailored measures in accordance with the measures outlined in the RAP – Entitlements Matrix, and Chapter 12.

- Monitoring and Reporting:

The Project will establish a monitoring system to track and report on the performance of resettlement and compensation measures. This system will engage affected people and assess their satisfaction with the process, as detailed in Chapter 13.

- Others:
  - Early Consultations and Notification for Land Acquisition Process:
    - Affected houses and businesses: The SPV will notify the owners and tenants of affected structures at least **six months in advance of the land entry** (which corresponds to approximately three months before start of expropriation in case of Article 8 and Article 27 processes), in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time for resettlement planning, including the relocation arrangements of affected houses and businesses.

      In cases where expropriation has already been **concluded**, the SPV will inform property owners of the Project schedule, and each owner will be granted a **six-month** notice period (prior to land entry) to vacate the property following notification. In cases where this timeframe cannot be provided, alternative case-specific support mechanisms will be agreed with the affected people and implemented accordingly.

      Where the required notice period cannot be met, the SPV will implement alternative measures agreed with the affected people to ensure that forced eviction is avoided.

    - Affected lands: The SPV will notify **users of affected lands** at least **three months** before land entry (which corresponds to approximately the time when expropriation has started with the Article 8 invitation). Land entry will only proceed after the completion of the expropriation process – including payment – or upon finalisation of mutual consent agreements with landowners and users.

      Wherever possible, the SPV will seek to extend the notification period and make early notifications six months prior to land entry. If this cannot be achieved, any losses experienced by landowners or by formal or informal land users will be compensated by the SPV.

      Where the required notice period cannot be met, the SPV will implement alternative measures agreed with the affected people to ensure that forced eviction is avoided.

  - Land Entry and Land Permit as part of Land Access Monitoring System:

    To prevent unauthorised land entry prior to the completion of expropriation or the formal execution of consent protocols with affected owners, the SPV will implement a **Land Access Monitoring System**. Under this system, the SPV – RAP Implementation Team will develop and implement a parcel-based **Land Access Tracking Register, which will be a live document,** accessible to both the SPV and EPC teams. A **Land Access Permit** document will be issued by the SPV for each parcel to be entered prior to land entry.

    The following actions will be implemented by the Project to ensure compliance with Lender's requirements:

- The completion status of expropriation, including compensation payments, shall be verified by the SPV's E&S Manager and/or the Resettlement Specialist and EPC's Health, Safety and Environment (HSE) Manager and/or the Expropriation Manager prior to the issuance of any work permits for construction activities, including topsoil stripping, excavation, and embankment (fill) works. The status will be registered in the Land Access Tracking Register.

- No construction activity shall commence on a parcel unless the expropriation process or a consent protocol (mutual agreement with the signature of all rightful shareholders) has been completed and all required payments, including crop compensation for formal and informal users, have been made, and documented through the Land Access Tracking Register.

  Exceptions may apply in specific cases – such as absentee landowners, ongoing legal disputes, or similar circumstances. In such cases, all details will be clearly documented, and the statutory expropriation compensation will be deposited into an escrow account, to be accessed by the affected people once legal issues are resolved. RAP compensation will be deposited in the Project's account and will remain accessible to the eligible persons.

- Provisions for Future Land Acquisition/Expropriation during operations phase:

  The same principles outlined in the RPF and this RAP will apply to any future land acquisition or expropriation activities required for the Project. In the event that additional land acquisition or expropriation becomes necessary, RAP addendum documents will be prepared and implemented by the SPV in collaboration with KGM, as outlined in Section 3.8.5.

  These RAP addenda will adhere to the same principles, procedures, and standards established in this RAP to address the specific displacement impacts associated with the new land requirements

6.2. Census and Inventory of Assets

The **census and asset inventory** for KGM motorway projects is conducted by appointed valuation contractors along the entire alignment, as mandated by Türkiye's Expropriation Law and in accordance with **KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables** (February 2019). This process identifies all land parcels – whether privately owned, legally registered to entities, or state-owned – within the motorway expropriation corridors, along with all formal and informal affected structures and trees on those parcels.

The census and asset inventory works for the Kınalı – Malkara Motorway Project commenced in **April 2024** and have been undertaken by a national engineering firm (**valuation contractor**) appointed by the SPV, with approval from KGM.

- The status of completion for the asset inventory, structure identification reports, and valuation reports is detailed in Section 2.6.

  In accordance with the procedures established under the Expropriation Law of Türkiye, as part of the census and inventory of assets, the legal owners and shareholders of affected lands, including structures and trees, are identified and included in the expropriation lists.

  In the case of structures on private or public parcels, structure valuation forms are prepared for each affected structure (e.g. houses, non-residential assets), and all trees are inventoried and incorporated into the expropriation plans. However, apart from the landowners, the **owners** of these structures and trees on public land (formal or informal land users) are **not** systematically recorded.

  Owners and shareholders of affected lands and assets are informed of the results of the census, inventory of assets and valuation during in-person negotiation meetings, should they participate in these meetings. These meetings are formally documented through signed agreement protocols or waiver (*"imtina")* records, if the owners agree to sign. In case of agreement, purchase agreement protocol is signed by both the negotiation commission and the relevant owner or shareholder.

To ensure the accuracy and completeness of the asset inventory carried out by the appointed valuation contractor based on field studies, the KGM institutes a multi-tiered control mechanism. As part of this, site verifications and spot checks are carried out independently by both Regional Directorates and representatives from the General Directorate. These inspections serve to validate the inventory prepared by the valuation contractor.

KGM also implements a grievance mechanism to address potential errors or omissions in the inventory of assets. Through this mechanism, affected people are able to raise grievances or objections during the negotiation meetings or submit them separately to the KGM's Regional Directorate (KÖSOB) through petitions. Upon receipt of such grievances, KGM conducts a re-examination of the concerned assets, assesses the validity of the claims, and amends the inventory where necessary.

During the negotiation meetings held in accordance with Article 8 of the Expropriation Law, the following information is shared with each owner or shareholder:

- Land registry details of the asset subject to expropriation, including the expropriated area, unit land price, and valuation criteria
- Detailed inventory of trees, structures, wells, walls, and other improvements, along with their respective quantities and assessed values
- Ownership information pertaining to the relevant owner or shareholder
- Total compensation amount proposed for payment to the owner or shareholders

- Informal Users

Under the national legal framework, the expropriation process does not mandate the census of informal users or individuals without legally recognisable rights or claims to the land or assets they occupy or use. **Nevertheless, all fixed assets on private and public lands – regardless of ownership status – are identified and documented by KGM in the expropriation plans and structure valuation forms prepared as part of the asset inventory process.**

However, no compensation for land is provided by KGM to land users under the Expropriation Law. 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 least at minimum material cost **(not at replacement cost)**, in accordance with Article 19 of the Expropriation Law, **provided they can demonstrate ownership of these assets.**

Informal users of forest and pasture lands are considered as **illegal occupants** ("*işgalci*") and considered not entitled to any form of legal compensation for either the land or the assets. As outlined in Section 7.3 – Entitlements Matrix, (i) if KGM pays only for minimum material cost as per Article 19 of the Expropriation Law (based on evidence of ownership), **top-up cash compensation to reflect market value and achieve full replacement cost** of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the asset owner by the SPV from the RAP Fund (only for structures/buildings), and (ii) if KGM does not provide any compensation (e.g. for structures on forest or pasture), cash compensation **at full replacement value** will be provided by the SPV from the RAP Fund to the asset owner (based on evidence).

These fixed assets may include residential, non-residential, and commercial structures, as well as trees and where available crops located on both private and public parcels. The data collected through this process form the basis for valuation activities conducted in accordance with the Expropriation Law of Türkiye.

In November 2025, the SPV engaged an implementation partner, to conduct a **user identification study** to identify formal and informal users of private and public lands within the Motorway project's expropriation corridor, initially for KM 0 – 35 and KM 70 – 105. The studies for KM 35 – 70 will be scheduled once the expropriation plans for this section become available. Information on the land users identified as part of RAP is presented in Section 3.2.2.

In accordance with the provisions of the RPF (December 2025) and this RAP, the SPV will inform both formal and informal users of the compensation they are entitled to – whether under national legislation (where applicable) or under the RAP – during the RAP implementation phase.

6.3. Valuation

In the Turkish legal system, there is a comprehensive legal framework regulating the acquisition of land and immovable properties and the payment of expropriation compensation under national legislation, including general provisions and laws such as the Constitution, the Expropriation Law (Law No. 2942, as amended by Law No. 4650), the Land Registry Law (Law No. 2644), the Pasture Law (Law No. 4342), the Forest Law (Law No. 6831), the Settlement Law (Law No. 2510), and the Law on the Prevention of Trespassing on Possessed Immovable Property (Law No. 3091).

According to the current Expropriation Law in Türkiye, compensation is paid within the framework of the principles specified in the Law to individuals who prove ownership or possession (titleholders or possessors) of private lands that are expropriated for public benefit, and to the relevant public institution in the case of public lands. No compensation can be granted to users or individuals benefiting from the land in other ways who are not among those specified above. Individuals who use public property without authorisation are not entitled to any portion of the expropriation compensation paid for such properties; however, compensation for any loss of income they may suffer due to the use of these lands are not considered.

Based on the census and asset inventory, the initial valuation of assets is carried out by the appointed engineering firm (valuation contractor) in accordance with the Expropriation Law and KGM's **Technical Specifications for the Services to be Procured for the Valuation of Immovables** (February 2019). As required by Law and the Technical Specifications, the valuation study considers various factors such as current market prices, landmark court rulings, precedent sales data, and the current building unit prices published by the Ministry of Environment, Urbanisation and Climate Change.

In addition to the appointed engineering firm (valuation contractor), KÖSOB also reviews and verifies the valuation of assets, including through joint site visits, before the approval of valuation reports and Article 8 negotiation meetings.

There are some gaps between the Turkish legal framework governing land acquisition and the standards of IFIs, as outlined in Section 4.4.

6.3.1. Key Valuation Provisions of the Expropriation Law

The key provisions of the Expropriation Law, particularly those related to asset valuation and compensation, are presented in Appendix G.

The valuation procedures and methods under the Law are primarily outlined in Articles 8, 11, and 12, as summarised below.

- Article 8 of the Expropriation Law sets out the principles governing the **negotiated purchase method**. It specifies the data sources to be used during the valuation process and provides procedural guidance. Under this Article, the expropriating authority is required to establish an internal valuation commission composed of at least three members. This commission is responsible for determining the compensation amount and conducting negotiations with the property owner to reach an agreement – either for purchase or exchange of the affected asset. The primary aim of this administrative process is to complete the expropriation through mutual agreement, thereby avoiding legal proceedings.

- Article 10 outlines the **determination of the expropriation price by the court and registration of the immovable property in the name of the administration**. If the expropriation cannot be carried out through the Article 8 purchase procedure, the administration applies to the civil court of first instance where the immovable property is located, attaching the information and documents collected under Article 7 of the Law, as well as the valuation it has had conducted under Article 8 and other related information and documents, and requests a decision for the determination of the expropriation price and for the registration of the immovable property in the name of the administration. If the parties fail to reach an agreement on the price during the hearing held by the court, the judge, within ten days at the latest, schedules an on-site inspection and set a hearing date for thirty days thereafter. The on-site inspection is conducted by the **experts** specified in **Article 15**[89] and in the presence of all relevant parties to determine the value of the

[89]Article 15 of the Expropriation Law outlines the rules for appointment of experts by the courts. Accordingly, the experts appointed by the courts under the Expropriation Law shall be selected from the lists prepared by the regional expert boards, and the provisions of the Expert Law and the relevant articles of the Code of Civil Procedure No. 6100 of 12/1/2011 shall apply to them. Depending on the type and characteristics of the

immovable property. For the purpose of ensuring the presence of the headman of the village or neighbourhood to which the immovable property belongs, a notice of invitation is also sent to the mukhtar, and the mukhtar's statement is taken during the inspection. The experts, taking into account the statements of the parties and other relevant persons, submit their report indicating the value of the immovable property, in accordance with the principles set out in Article 11.

- Article 11 outlines the **criteria for valuing land, parcels, and structures**. While the Law lists the factors to be considered in the valuation process, it does not elaborate on how these criteria should be applied in practice. In effect, the interpretation and implementation of these valuation principles have largely been shaped by judicial precedents and case law rather than detailed legal provisions.
- Article 12 grants the administration the authority to expropriate either an entire immovable property or a part thereof, in conjunction with Article 46 of the Constitution as well. This is known as **partial expropriation**. This Article regulates how the impact on the remaining (unacquired) portion of the property should be considered in the valuation. If partial expropriation results in a decrease in the value of the remaining part – or renders it unusable – this loss must be taken into account in the compensation process.

6.3.2. Valuation Methodology of KGM

KGM has adopted a formal guidance document titled **"Technical Specifications for Valuation Services"**, issued in **February 2019**, which governs the scope and methodology of services procured for the valuation of immovables. These specifications outline the procedures and principles that must be followed by contracted engineering firms (valuation contractors) when performing valuation and related technical services.

The responsibilities defined in the specifications include:

- **Valuation of lands and urban (constructible) plots**, whether or not they include structures, and whether they are subject to full or partial expropriation;
- **Valuation of buildings and permanent fixtures** located on the property;
- Determination and valuation related to the **constitution of easement rights (servitude)**;
- **Exchange of immovable properties**, where applicable;
- Determination of **fees for temporary occupancy** of land;
- **Valuation of standing crops, trees, and other physical assets** present on the land;
- Classification and distinction of immovables within the expropriation zone as either **land or urban plots**;
- Determination of **local average purchase-sale prices** for comparable parcels;
- Determination of the **capitalization rate** along the project route;
- Calculation of **diminution in value** for the **non-acquired portion** of a partially expropriated parcel.

These procedures form the basis for property valuation during land acquisition activities under KGM projects and are intended to ensure technical consistency, traceability, and fair compensation in line with national legislation.

immovable property subject to expropriation, it is mandatory to form an expert committee of at least three persons. One of the experts must be selected from among specialists who hold a master's or doctoral degree in real estate development, or from real estate valuation experts authorised under the Capital Markets Law No. 6362 of 6/12/2012. The fields of expertise of the experts shall be determined by taking into consideration the characteristics of the immovable property to be expropriated. The expert committee shall determine and assess the value of the immovable property in accordance with the provisions contained in Articles 11 and 12.

6.3.3. Review of Project's Valuation Study

The valuation study for the Project has been reviewed by the Senior Expropriation and Valuation Expert, who is also a certified real estate appraiser and a member of the RAP Consultant Team. The expert examined sample valuation reports prepared by the appointed valuation (engineering) firm, held consultations with their field teams, and reviewed the preliminary valuation report (June 2024) developed for the Section 3 (KM 70 – 105) of the Project.

The review of the expert concluded that the valuation study is largely aligned with KGM's Technical Specifications and that the methodological issues identified during the review of the valuation study are not considered to create gaps beyond those identified in Section 4.4 or to result in undue hardship or material disadvantage for the right holders.

The final valuation report for the Project is yet to be prepared. It is assumed that the valuation work in the Project is being carried out in accordance with KGM's Technical Specifications, whose processes and methodologies are generally considered to be consistent with International Valuation Standards. As is the case with all "Immovables Valuation Engineering Service Contracts" commissioned by KGM, **a final valuation report must be submitted** following the completion of field identification and inventory of assets, data collection, and valuation activities.

The final valuation report to be prepared for the Project must include detailed explanations of, at a minimum, the following topics:

- Methods used for mapping the expropriation boundaries and identifying appurtenant structures
- Methods for estimating production costs and net income (rents)
- Valuation methods for fruit orchards
- Methods for determining the capitalization rate
- Calculation of the average capitalization rate
- Methods applied in the valuation of urban plots
- Methods used in the valuation of structures

A summary of the key findings from this review and consultations with the KÖSOB is provided below as part of the RAP. The recommendations and actions identified by the expert have been appropriately incorporated into the RAP – Entitlements Matrix (see Section 7.3) to ensure consistency with applicable standards and best practices.

- Valuation of Agricultural Lands:

  Urban–rural transitions along the alignment have been reflected in the valuation approach. In the Silivri section, parcels have been assessed as urban plots, as agricultural land data would not capture prevailing purchase–sale values for areas that function as "plot" market segments. In areas such as Çorlu and Marmaraereğlisi, where land is predominantly agricultural in nature, parcels have been assessed as agricultural land. In other sections, starting from Silivri, a gradual transition approach has been applied, whereby parcels have been assessed as urban plots based on actual on-site conditions. For example, in Tekirdağ, parcels with frontage to state roads and parcels suitable for development or industrialisation have been treated as urban plots. These distinctions have been determined based on actual conditions, rather than administrative district or village boundaries.

  Actual market prices are taken into account in the valuation process. Accordingly, in the Silivri section, areas where hobby gardens and access points to certain commercial establishments are affected have been identified, and valuation and compensation payments are based on current market conditions. Parcels in Silivri containing fruit gardens are assessed using a combined approach, whereby the underlying land value is calculated together with the value of trees.

  According to KÖSOB, there are no orchards ("kapama bahçe") within the Motorway corridor. Tree species and ages vary significantly along the alignment, and there are no uniform orchards consisting solely of olive, walnut, or pomegranate trees. Parcels generally contain two or three different tree species.

The review of the valuation report by the expert concluded that for the valuation of agricultural lands, the use of **5-year window (covering 2020 – 2024)** of land sales to derive capitalisation rates must be reconsidered due to the **post-pandemic volatility**, with annual land price increases exceeding 100% in some years. For dry-field land, sales from 2021, 2022 and 2023 were combined **without any inflation adjustment (TÜFE – CPI indexation)** to bring them to the valuation date. For irrigated fields, no capitalisation rate was calculated for this category. Only dry-field rates were produced. Objective-criteria uplifts are valid only in the Comparable Sales Method, should not be used in the Income Method.

- Valuation of Urban Plots:

Within the scope of the Project, unit values for urban plots have been assessed by taking into account local market conditions and development potential. For neighbourhoods located in proximity to the city centre and in areas with high development potential, appropriate unit values reflecting the market have been applied.

A parcel can only be classified as plot (*arsa*) if, on the valuation date, it lies within the municipal zoning plan, or – failing that – within municipal or adjacent (*mücavir*) area boundaries, benefits from municipal services, and is in a built-up (*meskûn*) area. This must be documented in the parcel-level report with supporting evidence from the relevant municipality. Parcels located outside municipal and adjacent area boundaries that host touristic facilities, fuel stations, cooperative housing, or similar social/economic facilities should not be valued as urban plot. Likewise, parcels within neighbourhood administrative boundaries but outside any municipal or adjacent area should be valued as agricultural land.

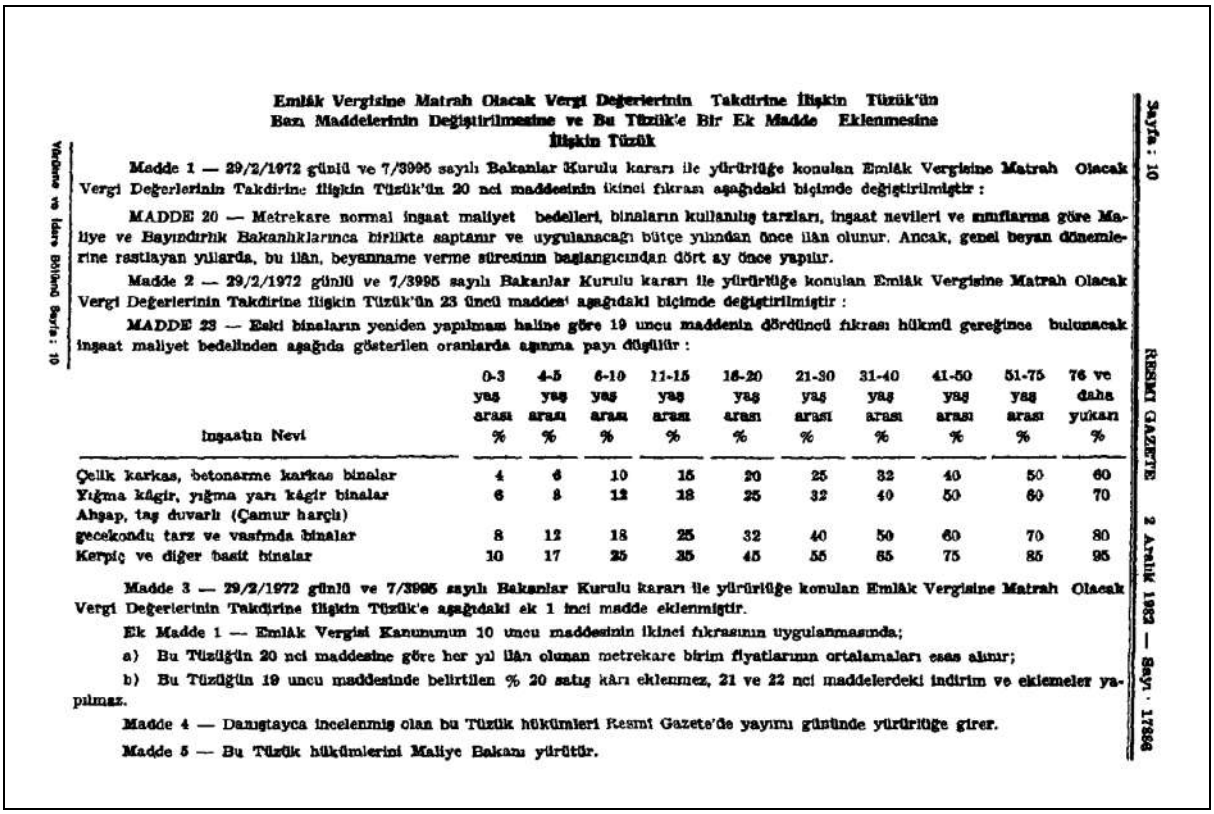
The intention to value agricultural parcels as urban plots using the comparable sales method, rather than valuing them as agricultural land using the income approach, should be carefully assessed to ensure that the criteria for classification as urban plots are properly satisfied. Parcels located outside the Municipality Implementation Zoning Plan, lacking access to full municipal services (e.g. sewerage infrastructure), and not situated within or surrounded by built up areas should not be treated as urban plots.

As part of the valuation study, no plot valuation report has been prepared, presumably because there are no urban plot-classified parcels in Section 3. Methodology section of the valuation report for Section 3 needs elaboration for urban plot valuation. A significant concern is the **proper assessment of value loss in remaining parcels (orphan lands)** after partial expropriation, particularly where the motorway may diminish a plot's commercial appeal. where a cadastral parcel has not yet been converted into a zoning parcel (i.e. where Article 18 parcellation has not yet been applied), the post-expropriation remainder will be assessed jointly with other parcels during the subsequent municipal Article 18 application, so no value loss is expected to arise. **However**, where road dedications have already been completed and the parcel is a fully formed zoning parcel, the value loss in the remainder must be assessed equitably.

KGM submits its motorway alignment plans to municipalities and relevant institutions for incorporation into zoning plans. According to the relevant legislation, objections are required to be raised within 30 days, otherwise the alignment plans become binding for zoning purposes. Municipalities will undertake or have already undertaken the necessary zoning amendments along the corridor.

- Valuation of Structures

The structure valuation forms reviewed for the Section 3 (KM 70 – 105) were prepared using the Ministry of Environment and Urbanisation's 2025-unit construction cost figures and are methodologically sound. In accordance with the Expropriation Law, depreciation is applied using the “Depreciation Rates Table” published in the Official Gazette No. 17886 on 2 December 1982 (see Figure 6-1), taking into account the age of the structure.



Emlâk Vergisine Matrah Olacak Vergi Değerlerinin Takdirine İlişkin Tüzük'ün Bazı Maddelerinin Değiştirilmesine ve Bu Tüzük'e Bir Ek Madde Eklenmesine İlişkin Tüzük

Madde 1 — 29/2/1972 günlü ve 7/3995 sayılı Bakanlar Kurulu kararı ile yürürlüğe konulan Emlâk Vergisine Matrah Olacak Vergi Değerlerinin Takdirine ilişkin Tüzük'ün 20 nci maddesinin ikinci fıkrası aşağıdaki biçimde değiştirilmiştir :

MADDE 20 — Metrekare normal inşaat maliyet bedelleri, binaların kullanılış tarzları, inşaat nevileri ve sınıflarına göre Maliye ve Bayındırlık Bakanlıklarınca birlikte saptanır ve uygulanacağı bütçe yılından önce ilân olunur. Ancak, genel beyan dönemlerine rastlayan yıllarda, bu ilân, beyanname verme süresinin başlangıcından dört ay önce yapılır.

Madde 2 — 29/2/1972 günlü ve 7/3995 sayılı Bakanlar Kurulu kararı ile yürürlüğe konulan Emlâk Vergisine Matrah Olacak Vergi Değerlerinin Takdirine ilişkin Tüzük'ün 23 üncü maddesi aşağıdaki biçimde değiştirilmiştir :

MADDE 23 — Eski binaların yeniden yapılması haline göre 19 uncu maddenin dördüncü fıkrası hükmü gereğince bulunacak inşaat maliyet bedelinden aşağıda gösterilen oranlarda aşınma payı düşülür :

İnşaatın Nevi	0-3 yaş arası %	4-5 yaş arası %	6-10 yaş arası %	11-15 yaş arası %	16-20 yaş arası %	21-30 yaş arası %	31-40 yaş arası %	41-50 yaş arası %	51-75 yaş arası %	76 ve daha yukarı %
Çelik karkas, betonarme karkas binalar	4	6	10	15	20	25	32	40	50	60
Yığma kâgir, yığma yarı kâgir binalar	6	8	12	18	25	32	40	50	60	70
Ahşap, taş duvarlı (Çamur harçlı) gecekondu tarz ve vasfında binalar	8	12	18	25	32	40	50	60	70	80
Kerpiç ve diğer basit binalar	10	17	25	35	45	55	65	75	85	95

Madde 3 — 29/2/1972 günlü ve 7/3995 sayılı Bakanlar Kurulu kararı ile yürürlüğe konulan Emlâk Vergisine Matrah Olacak Vergi Değerlerinin Takdirine ilişkin Tüzük'e aşağıdaki ek 1 inci madde eklenmiştir.

Ek Madde 1 — Emlâk Vergisi Kanununun 10 uncu maddesinin ikinci fıkrasının uygulanmasında;

a) Bu Tüzüğün 20 nci maddesine göre her yıl ilân olunan metrekare birim fiyatlarının ortalamaları esas alınır;

b) Bu Tüzüğün 19 uncu maddesinde belirtilen % 20 satış kârı eklenmez, 21 ve 22 nci maddelerdeki indirim ve eklemeler yapılmaz.

Madde 4 — Danıştayca incelenmiş olan bu Tüzük hükümleri Resmi Gazete'de yayımı gününde yürürlüğe girer.

Madde 5 — Bu Tüzük hükümlerini Maliye Bakanı yürütür.

Yönetim ve İdare Bölümü Sayfa : 10

Sayfa : 10 RESMİ GAZETE 2 Aralık 1982 — Sayı : 17886

Figure 6-1. Depreciation Rates Table

6.3.4. Future Valuation Updates

As part of Project's expropriation process, Article 8 negotiations are conducted on the basis of up-to-date valuation studies, within a reasonable period of time after the valuation reports are prepared and approved by KGM.

In future, where required, valuation rates for land and assets will be updated by KGM **at least annually**.

The following factors are typically considered in these valuation updates:

- Since agricultural data changes every year, land prices (based on cost and income) are updated according to agricultural data announced by the directorates of agriculture in the early months of the year.
- As for plots (zoned land), since valuation is done using the comparable sales method, updates are made as market transaction values change. The general practice is to set the price at the beginning of the year and use the same prices until the end of the year.
- For buildings, updates are made based on the approximate construction unit costs published in the Official Gazette in the first months of each year (except for years with high inflation, when these unit costs have been published multiple times a year in the Official Gazette).
- The prices can be updated at any time by considering market conditions and inflation effects – subject to approval by the KGM.

6.4. Avoidance of Forced Eviction and Procedure for Lawful Evictions

The term **forced eviction** is defined by IFC GN5 (2012) as "*The permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or lands which they occupy without the provision of, and access to, appropriate forms of legal and other protection.*"

The SPV is committed to complying with the IFC PS5 requirements on forced eviction and avoiding forced eviction throughout the land acquisition and expropriation process and complying with the relevant requirements of the international standards, through the measures to be taken in coordination with KGM. Accordingly, the SPV is fully committed to implementing the necessary measures to ensure that no homeowner is left without a house. In this regard, the measures set out in this RAP will be implemented, and where necessary, alternative methods will be developed in consultation with KGM, the affected people, and the Lenders during site implementation.

However, if **eviction is lawful** and **becomes unavoidable** despite prior engagement and the enhanced information and consultation process, the SPV will prepare and submit to Lenders and LESA for review and comments an information note (memo) detailing all of the steps taken by SPV and KGM showing evidence that all avenues are exhausted leaving the only option as lawful eviction. Following the information of and consultations with the Lenders and LESA, the SPV will submit a formal request to KGM to proceed with the eviction of expropriated properties and KGM will execute the eviction of expropriated properties in accordance with Article 20 of the Expropriation Law.

The SPV will implement feasible measures before, during, and after the eviction process, as outlined in Table 6-1, but will avoid direct involvement in eviction process undertaken by KGM.

Table 6-1. Procedure to be followed by KGM for Lawful Eviction of Expropriated Properties and Measures to be taken by SPV when to Eviction by KGM is Unavoidable

No.	**Steps to be followed by KGM in case of Lawful Eviction** in accordance with Expropriation Law – Article 20	**Measures to be taken by SPV**
Prior to Eviction		
0	• If deemed necessary, KGM may, at its discretion, inform the PAPs of their rights, obligations, and potential liabilities under the Expropriation Law, particularly Article 20, in order to ensure that the process is formally communicated and clearly understood by the PAPs. • KGM will not carry out any additional engagement activities **prior to eviction**, other than the negotiations conducted under Article 8 of the Expropriation Law.	• The SPV will increase engagement with those involved before eviction is considered, providing genuine opportunities for dialogue with no pressure or coercion exerted, and document all engagement and attempts at reaching a reasonable agreement prior to eviction: - GLAC: GLAC, providing a concise, clear, and non-technical summary of the RAP, will be distributed and presented to affected people during **early consultations and notification for land acquisition**[90] process to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 27 – their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements. - Enhanced Information and Consultation: The SPV will implement enhanced communication strategies, as outlined in Chapter 10, to ensure affected persons understand; (i) the expropriation process and their legal rights, (ii) compensation mechanisms provided by KGM; and (iii) additional entitlements and support available through the RAP Fund managed by the SPV. • As required by IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) (specifically Box 6.5 on Lawful Evictions: Factors and Measures to Consider), the SPV will avoid changing the compensation entitlements established in the RAP and negotiated with other affected persons which would raise a risk of

[90] In line with this RAP including key compensation and assistance principles presented in Section 6.1,
- Affected houses and businesses (if any): the owners and tenants of affected structures will be notified by the SPV at least **6 months** in advance of the land entry (which corresponds to approximately three months before start of expropriation in case of Article 8 and Article 27 processes).
- Affected lands: users of affected lands will be notified by the SPV at least three months before land entry.

No.	Steps to be followed by KGM in case of Lawful Eviction in accordance with Expropriation Law – Article 20	Measures to be taken by SPV
		unfairness and increase the risk of conflict with others – **unless** a correction or update is required for fairness. • The entitlements included in the RAP and presented to affected people through GLAC will be strictly followed. • The SPV will provide full information on legal avenues available to those affected and legal aid to those in need of it to seek redress, at no cost to those affected. - Project-specific Grievance Mechanism: The SPV will ensure that the affected persons have access to the Project-specific Grievance Mechanism, which includes an Appeal Mechanism, throughout the expropriation and RAP implementation periods. • Prior to eviction, the SPV will ensure adequate and reasonable notice to all affected persons: - Early Consultations and Notification for Land Acquisition Process: Affected houses and businesses: The SPV will notify the owners and tenants of affected structures at least **6 months before land entry**, in alignment with KGM's expropriation programme. This is intended to avoid forced eviction and allow sufficient time for resettlement planning, including the relocation arrangements of affected businesses. In cases where expropriation has already been **concluded**, the SPV will inform property owners of the Project schedule, and each owner will be granted a **6-month** notice period to vacate the property following notification. Affected lands: The SPV will notify **users of affected lands** at least **3 months** before land entry. Land entry will only proceed after the completion of the Article 8, Article 10 (if direct) or Article 27 process – including payment – or upon finalisation of consent protocols with landowners and users. • The SPV will ensure that reasonable **temporary accommodation** is provided to those evicted should they not have an alternative place to stay. - During the early consultation and notification phase of the land acquisition process, the SPV will engage with affected individuals to identify any temporary accommodation needs and will make the necessary arrangements accordingly, if required.
1	• KGM Regional Directorate – **Department of Immovables** (administration) submits the eviction request to the Legal Department, along with the relevant expropriation documentation for the properties to be vacated.	• If eviction becomes unavoidable despite prior engagement and the enhanced information and consultation process, the SPV will submit a formal request to KGM to proceed with the lawful eviction of expropriated properties. This request will: - Include a reference to the requirements of IFC PS5 regarding lawful evictions - Refer to the Project-specific Human Rights Policy, - Emphasize the need for KGM to coordinate with public security forces to ensure that no disproportionate force is used during the process - Request KGM to ensure that evictions are not to take place in bad weather or at night; specific care is taken of vulnerable people, particularly disabled or sick individuals, pregnant or lactating women, young children, the elderly, and those that are at risk of gender-based violence
2	• KGM Regional Directorate – **Legal Department** informs the executive office ("*İcra Müdürlüğü*") at the relevant Court of Justice ("*Adliye*") about the properties to be vacated and formally requests their eviction, through the National Judiciary Informatics System (UYAP).	

No.	**Steps to be followed by KGM in case of Lawful Eviction** in accordance with Expropriation Law – Article 20	**Measures to be taken by SPV**
3	• The executive office sends a registered letter with return receipt to the property owners, giving them a **15-day** notice, in accordance with the Expropriation Law – Article 20.	• The SPV will inform the Lenders and the LESA in advance of the request for eviction process. Before SPV submits a formal request to KGM to proceed with the eviction of expropriated property, an information note (memo) detailing all of the steps taken by SPV and KGM showing evidence that all avenues are exhausted leaving the only option as forced eviction, will be prepared and submitted by the SPV to Lenders and LESA for review and comments. • To avoid direct involvement in implementing evictions and avoid reputational and operational risks, the SPV will not be involved in the process after KGM sends out any legal notice to the PAPs and starts proceeding with the eviction.
4	• According to the Law, written notification is sufficient. However, in small settlements, verbal notification can also be given by visiting the location. In such cases, to identify the user of the property, a joint visit to the site is conducted either before or after the official notification. This visit is carried out by law enforcement officers, an enforcement officer, a KGM lawyer, and personnel capable of identifying the location of the property (e.g., a staff member from the Department of Immovables). During this visit, the user and any structures subject to eviction are identified, and an official record is prepared.	
During Eviction		
5	• After 15 days, the eviction procedure is initiated by the administration's lawyer, the relevant executive officer, and depending on the condition of the property, workers and law enforcement officers (if requested). They visit the property to check whether it has been vacated; if not, eviction is carried out. If eviction is carried out through enforcement, the enforcement costs are charged to the property owner. • The belongings of the evicted households are moved to a trustee (custodian) appointed in advance. The costs of the trustee and laborers are charged to the property owner.	• The SPV will avoid direct involvement in implementing evictions and exercise caution and monitor the process to avoid reputational and operational risks. • The SPV will coordinate with KGM to provide independent medical assistance, subject to approval by the relevant authorities. • The SPV will cover the cost of trustee.
After Eviction		
6	• KGM will not carry out any additional engagement activities or provide additional measures after the eviction.	• The SPV will continue to monitor the conditions of individuals who have been evicted and will document their circumstances in periodic internal RAP monitoring reports submitted to the Lenders.

Content of the Lawful Unavoidable Eviction Memo

The content of the information note (memo) to be prepared by the SPV and submitted to Lenders and LESA ahead of any lawful unavoidable eviction will include – at minimum – the following information[91]:

- **Description of assets and individuals affected by the eviction**: this should include the number of homesteads and persons impacted, paying particular attention to the presence of vulnerable groups such as elderly, disabled persons, women-headed households or children.
- **Justification for the eviction**: an explanation of the necessity of the eviction in the context of project implementation and scheduling requirements, demonstrating why alternative measures are not feasible.
- **Legal procedures and consultation efforts undertaken to avoid eviction**: this section should outline the relevant national legal framework governing the eviction, detail the land acquisition process undertaken prior to the eviction decision (including consultations and negotiations carried out), describe compensation offers made (including the status of acceptance or refusal and reasons for refusal), and document all notifications and direct engagement with affected persons such as information dissemination, negotiation, and grievance resolution and mediation efforts.
- **Roles and responsibilities of parties involved in the evacuation process**: this section should clearly define the roles and responsibilities of all parties involved, including the client, the expropriation agency, the relevant local authorities and, where needed, security personnel. It will specify the scope of each party's duties to ensure a coordinated, lawful and respectful evacuation process, paying particular attention to compliance with legal requirements, protection of affected persons' rights and maintenance of safety and order throughout the procedure.
- **Mitigation measures implemented** to reduce adverse impacts: this may include measures to avoid potential conflict at the time of the eviction and the provision of transportation assistance, temporary housing, health and psychosocial support or other relevant support measures aimed at minimising harm to affected individuals.
- **Detailed process and timeline for planned eviction**.

[91] This is the content recommended by the European Bank for Reconstruction and Development (EBRD) in the Environmental and Social Requirement 5 Guidance Note on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (December 2025).

7. Eligibility and Entitlements

According to IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), "***Eligibility*** *includes a definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cutoff dates*" and "***Entitlement*** *describes all categories of affected persons and the options that they are being offered for all losses (including compensation, allowances, assistance and livelihood-restoration measures, resettlement housing). This is preferably provided in tabular form (entitlement matrix).*"

7.1. Eligibility

The Expropriation Law of Türkiye recognises the **legal** owners and shareholders of affected assets, as well as **formal users** of state-owned lands (e.g., registered users of treasury parcels or users who pay occupancy fees – "*ecrimisil*"), as eligible for compensation. The census and asset inventory by KGM identifies legal owners and shareholders, as well as all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation.

Regarding the compensation of **informal users**, the Expropriation Law – **Article 19** ("Registration of immovable properties not recorded in the land registry and the rights of the possessor") stipulates that "*In the expropriation of properties that are registered under someone else's name, ownerless, and/or not acquired by the possessor, the minimum material cost of buildings and the value of trees as appraised under Article 11 are paid to the possessor*". This does not include informal users of forest and pasture parcels.

The census and asset inventory by KGM identifies legal owners and shareholders, as well as all affected structures and trees on both private and state-owned lands, regardless of the ownership status, and includes them in the valuation. Section 3.1.7 provides a summary of the assets identified on public and legal entity lands, indicating that no residential structures or businesses requiring relocation are located on public land.

Eligibility under RAP

The eligibility categories of displaced people as defined by IFC PS5, and the eligibility of people falling into respective categories under Expropriation Law is summarized in Table 7-1.

All affected persons falling within these three categories are eligible for compensation and/or assistance under this RAP, tailored to their specific impact category, as detailed in Section 7.3 – Entitlements Matrix.

The RAP is a living document and will be revised, as needed, to incorporate any additional categories of affected people or other individuals identified as affected during the course of RAP implementation.

In accordance with international standards, **individuals who encroach upon the Project area after the cut-off date will not be eligible** for compensation or assistance under this RAP.

Table 7-1. Eligibility Categories under IFC PS5 and Corresponding Provisions under Turkish Expropriation Law

Eligibility Categories according to IFC PS5	Eligibility of Corresponding People under Expropriation Law
(i) who have formal legal rights to the land or assets they occupy or use;	Affected people falling into this category are eligible for compensation under Expropriation Law. This includes formal users of state-owned lands (except for forests and pastures), who may receive compensation for any structures, trees, and standing crops, they have on the land – though not for the land itself.
(ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognizable under national law[92]	Affected people falling into this category, such as informal users of treasury who pay adequate pay ("*ecrimisil*") for their informal occupation, are eligible for compensation for their affected structures – **based on minimum material cost** ("*asgari levazım bedeli*") – and trees under Expropriation Law – Article 19. No compensation is provided for the land itself. The Expropriation Law of Türkiye recognises possessor ("*zilyet*") rights where there is no title deed (in the absence of cadastral surveys). However, in the area where the Motorway route passes, the cadastral works along the expropriation corridor have been completed by TKGM and there are no parcels without title deed registration; hence, no possessory ("*zilyet*") rights exist in this Project.
(iii) who have no recognisable legal right or claim to the land or assets they occupy or use.	Affected people falling into this category – such as informal users of forest and pasture lands are considered as **illegal occupants** ("*işgalci*"), are not entitled to any form of legal compensation for either the land or the assets.

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

The categories of eligible people under this RAP, as aligned with the Impact Categories given in Table 7-2 and the Entitlements Matrix, is presented in Table 7-6. This includes owners and shareholders, as well as formal and informal users of affected lands and structures (such as affected houses, assets), owners of trees, business owners and their formal and informal employees, among others.

Table 7-2. Categories of Eligible People under RAP

Impact Category	Eligible People Categories
(i) Affected Lands	
Permanent loss of private parcels – agricultural parcels and urban plots[93] (urban lands)	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Loss of litigous properties[94] (“*ihtilaflı bulunan mülkiyet*”)	Litigants claiming to be rightful owners/shareholders of litigious properties – eligibility for compensation under the Expropriation Law is validated by the courts through the Article 18 process
	Users of litigious parcels
Orphan lands	Owners/ shareholders
	Formal Users (with tenancy agreement)
	Informal Users (with no official documentation)
Permanent loss of state-owned treasury parcels (e.g. treasury, registered pasture lands, non-registered parcels) which are used for agriculture or other income generating activities)	Formal users with official documentation
	Informal users with no official documentation
Permanent loss of forest land	Users of forest lands
Permanent loss of treasury – pasture lands	Users of affected parcels for grazing
Restriction of access to grazing lands – located out of Project expropriation corridor (public or private) due to land fragmentation or other Project-related factors	Users of grazing lands
Loss of crops	Owners of the crops (owner or formal/informal user of the land)
Loss of trees (fruit or non-fruit trees)	Owners of the trees (owner or formal/informal user of the land)
Loss of non-residential (secondary) structures on affected private or public parcels (such as fences, barns, sheds, wells, other infrastructure)	Owners of non-residential structures who are landowners or formal tenants/users (with official documentation)
	Owners of non-residential structures who are informal users of lands (with no title deed/official documentation but can prove their ownership of the structure)
	Owners of non-residential structures who are informal users of lands with no official documentation proving their ownership of the structure or users of forestry and pasture lands
Special-use Assets	Operator of a dog shelter

[93] Urban lands which are parcelled by the municipalities within the municipal boundaries are regarded as constructible plot (in Turkish “*arsa*”) as per the Real Estate Tax Law of Türkiye (Law No. 1319, Article 12). Designation of lands as constructible plot (urban land or *arsa*), which have not been parcelled inside or outside the municipal boundaries, is decided by Presidential Decree or other legal arrangements as applicable.

[94] According to Article 18 of the Expropriation Law (“Determining Whether the Immovable Property Is in Dispute”), “*the administration shall determine whether there is any dispute regarding the ownership of the immovable property decided to be expropriated by making inquiries with the land registry office, the cadastral directorate, and the civil courts located in the area where the immovable property is situated, and by conducting an on-site investigation. **If the research indicates that the immovable property is registered in the land registry but is subject to an ownership dispute before a court**, or that although the cadastral work has been completed, the property is the subject of a case before the cadastral court, the administration shall submit all documents prepared pursuant to Article 10 to the civil court of first instance where the immovable property is located and request a decision for the determination of the expropriation value of the immovable property and for its registration in the name of the administration in return for payment of this value in advance, or in instalments if the expropriation has been conducted in accordance with the second paragraph of Article 3, to the rightful owner who will be determined based on the outcome of the ownership dispute. The court shall notify all parties to the ownership dispute concerning the immovable property, ensure that notifications and announcements are made in accordance with Article 10, determine the expropriation value of the immovable property again in accordance with the procedures of that article, and after this value is deposited by the administration into the bank designated by the court in a three-month term account pursuant to Article 10, **to be paid to the rightful owner to be determined upon conclusion of the ownership dispute**, the court shall order the **payment of this amount to the rightful owner to be determined later** and the registration of the immovable property in the name of the administration, and shall notify this decision to the land registry office and the bank where the money has been deposited. In expropriations carried out under the second paragraph of Article 3, the initial and subsequent instalments of the expropriation value determined by the court shall also be deposited into the three-month term accounts in the bank designated by the court. **Upon application of the person who is determined by the court to be the rightful owner as a result of the ownership dispute**, the court that determined the expropriation value shall issue an instruction to the bank **for payment of the money to this rightful owner, and the money shall be paid to that person**”. Please refer to RAP – Section 7.3 (“Entitlements Matrix”) for compensation and support to be provided by SPV to rightful owners determined by the courts through the Article 18 process, indicating that “*all entitlements defined for owners under “(i)1 – Permanent loss of private parcels” will also apply to litigants who claim to be the rightful private owners or shareholders, **provided that their eligibility for compensation under the Expropriation Law is validated by the courts through the Article 18 process**. These entitlements, including any compensation and/or assistance, will be delivered by the SPV to the **validated rightful owners/shareholders** upon completion of the Article 10 process”.*

Impact Category	Eligible People Categories
(a dog shelter and a pet cemetery)	Operator of a pet cemetery and
	Families/guardians of the buried pets
Constitution of servitude (easement leading to loss of value of the immovable)	Owners of the parcels to be acquired through constitution of servitude (easement rights) (none)
(ii) Affected Residential Structures (Houses)	
Loss of **formal** residential houses on affected **private parcels**	Owner of affected house
	Formal user (formal tenant)
	Informal users (none)
Loss of **informal** residential houses on affected **public parcels**	Owner and user of **affected house** (none)
(iii) Affected Businesses	
Loss of business structures (fully or partially) on affected **private parcels**	Formal or informal business owners who are the "**owner**" of the affected business structure
	Formal or informal business owners who are the "**tenants**" at the affected business structure
	Not a business owner at the affected business structure but the owner of the affected building (none)
	Formal and **informal** employees of affected businesses
Loss of business structures (fully or partially) on affected **public parcels**	Owner or user of informal business structure
	Not a business owner at the affected business structure but the owner of the affected building (none)
	Formal and **informal** employees of affected businesses
Business owners who will not be relocated but may experience partial loss of land and/or assets	**Owner** or **tenant** of the affected business structure
	Formal and **informal** employees of affected businesses
(iv) Vulnerable People	
Affected households with vulnerable members – may be exposed to any type of loss/impact given for the above PAP Categories with a more significant level of impact due to vulnerability or disadvantaged condition	All physically and economically displaced households with vulnerable members (please refer to Chapter 12 for vulnerability categories)
Vulnerable employees	Informal employees (Employees who are not registered by their business owner at the workplace under the Social Insurance and Universal Health Insurance Law (No. 5510) of Türkiye). Employees with vulnerabilities (please refer to Chapter 12 for vulnerability categories)
(v) Temporary Losses/Impacts During Construction	
Temporary loss of private parcels during construction (including access restrictions)	Owners/shareholders
	Formal users (formal tenants)
	Informal users
Temporary loss of state-owned parcels during construction (including access restrictions)	Owners (Governmental institutions)
	Formal users (formal tenants)
	Informal users
Non-land related livelihood losses due to construction	Owners and formal/informal users of lands and assets – as applicable
Temporary interruption/disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any
(vi) Impacts During Operation	
Operation phase E&S impacts (e.g. operation noise, vibration, air quality, community health and safety)	Owners and/or formal/informal users of residential structures/houses for which impacts cannot be mitigated to levels compliant with Project standards through operation phase management plans

As mentioned in Section 3.2.3 during the RAP process, the development of a **Project Affected People (PAP) Database for Land Acquisition** was initiated. This database incorporates information on owners and shareholders identified by the KGM (through national engineering firm/valuation contractor) through the census and asset inventory process, as well as formal and informal users of affected lands, structures (such as houses, businesses), and trees, identified "by the RAP Consultant Team and the Project CLOs during the RAP field surveys in 2025 and 2026. The database also includes contact information and information on any identified vulnerabilities among affected people.

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

Confirmation of Eligibility during RAP Implementation

During RAP implementation, the SPV – RAP Implementation Team will establish a transparent and well-communicated mechanism for delivering entitlements to eligible affected people. The affected people will be informed about the required documentation for eligibility evaluation, as well as the overall evaluation and implementation process, including the grievance mechanism through the GLAC to be distributed to affected people. Eligibility will be assessed on a case-by-case basis.

The documentation to be requested from affected people for the evaluation of eligibility for entitlements may include, but is not limited to, the ones listed in Table 7-3.

The SPV will work closely with affected households and business owners throughout the relocation process. This support may include coordinating services such as hiring real estate agencies, transportation firms, and logistics providers for the disassembly, transport, and reassembly of movable property, machinery, and equipment.

The affected people will be clearly informed in advance about which documentation is required for eligibility assessments and which costs are eligible for direct payment or reimbursement, as further detailed in Section 7.3.

- The SPV will provide guidance on acceptable expenditures, the process for obtaining valid quotations from vendors and the proper documentation required to support them.
- Affected people will be advised to retain and submit all relevant receipts and proof of payment. For any costs that are to be reimbursed after they are incurred, the SPV's prior approval of the expenditure will be mandatory. Supporting documentation must be submitted by PAPs before any reimbursement is processed.
- The SPV will oversee the submission and approval of all relocation-related expenses – such as moving and transaction costs – or collection of quotations from multiple vendors before the relocation takes place. All coordination will be carried out in line with the SPV's corporate procedures for administrative affairs and procurement.

RAP implementation by the SPV will ensure that a consistent and fair approach is applied to documentation requirements and eligibility assessments.

Table 7-3. Examples of Required Documentation for Eligibility Assessment

Impact Category	Affected People Category	Examples of Required Documentation for Eligibility Assessment
Affected lands	Owners	- Official documentation of ownership for the affected assets (e.g., land registry records/title deeds, inheritance documents) - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs
	Formal agricultural users	- Farmers Registry System registration - Tenancy agreements - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs - E-state, TarımCep records on livestock establishments, livestock holdings, etc. of affected people - Quotations from multiple vendors for the relocation of movable assets
	Informal agricultural users	- Information from the asset inventory survey - Evidence/confirmation of land use provided by settlement heads, community leaders, and other credible witnesses or third parties - Documentation on the total productive area owned and/or used, both within and outside the expropriation corridor - Documentation on transaction costs
Affected residential structures (houses)	House owners	- Title deeds for affected land and structures - Quotations from multiple vendors for the relocation of movable assets - Documentation on expenses such as moving and transaction costs, fees paid to authorities and service providers, and price quotes from vendors and other transaction costs - Evidence of expenditures made for fixed investments and improvements
	Tenants	- Lease agreements (for formal renters) and relevant documentation/confirmation from the structure owner, mukhtar or other credible witnesses - Documentation on expenses such as moving and transaction costs, fees paid to authorities and service providers, and price quotes from vendors and other transaction costs - Evidence of expenditures made for fixed investments and improvements
Affected Businesses	**Business owners**	- Title deeds for affected business structures (for structure owners) or lease agreements (for formal renters) - Legal company documentation - Financial records, accounting documents, social security registration, permitting documentation, etc. - Quotations from multiple vendors for the relocation of movable assets - Documentation of moving and transaction costs, including fees paid to authorities and service providers, and price offers/quotes as requested by the SPV and other transaction costs - Evidence of expenditures made for fixed investments and improvements

7.2. Cut-off Date

According to IFC[95], "***The cutoff date is the date after which any new structures, trees, crops, and other immovable assets will no longer be counted or measured for compensation purposes.*** *The intent of the cutoff date is to avoid opportunistic settlement or construction of new structures by existing households (in the expectation of compensation) in the area earmarked for project use*".

IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) includes the following as key considerations regarding the cut-off date:

> *"If a cutoff (sometimes called a "moratorium") is provided by local legislation (usually the case where eminent domain procedures are applied), make sure that the cutoff date as mandated by local legislation (usually the date at which a certain legal act is taken) can correspond to the cutoff date required by PS5 (**the date at which the census and asset surveys are completed). Typically, the date of publication of a declaration of public interest** (or similar eminent domain–related act) will become the cutoff date. The additional requirement of PS5 is to ensure that the cutoff date and its conditions (e.g., no erection of new structures, no planting of new trees and crops) are disclosed, which is not always mandated by local legislation. Aligning the declaration of public interest mandated by local laws with the cutoff date disclosure required by PS5 calls for careful coordination with government agencies and must be planned well in advance."*

Table 7-4 provides a summary of the public benefit (interest) and accelerated expropriation decisions issued to date for the Project.

Table 7-4. Existing Public Benefit and Accelerated Expropriation Decisions

Decision Type	Executing Authority	Decision Date	Decision No.	Scope of the Decision
Public Benefit Decision	MoTI	6 July 2022	2022/138	Motorway
Accelerated Expropriation Decision	Presidency	12 April 2023[96]	7060	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)

In establishing the cut-off date for the Project, the key requirements of IFC PS5, as outlined below, have been taken into account.

> **IFC PS5 –** Paragraphs 12 and 23
>
> **Para. 12.** "*In the absence of host government procedures, the client will establish a cut-off date for eligibility. **Information regarding the cut-off date will be well documented and disseminated throughout the project area.**"*
>
> **Para. 23.** "*The client is not required to compensate or assist those who encroach on the project area after the cut-off date for eligibility, provided the cut-off date has been clearly established and made public*."

The Expropriation Law of Türkiye provides a cut-off date definition applicable to the owners and shareholders of properties, as provided below.

[95] https://www.ifc.org/content/dam/ifc/doc/2023/ifc-handbook-for-land-acquisition-and-involuntary-resettlement.pdf
[96] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

Article 25 – Restriction of Rights and Transfer of Ownership to the Administration

"*In terms of the exercise of rights and the fulfilment of obligations, the expropriation process begins for the property owner with the court notification issued in accordance with Article 10. The transfer of ownership to the administration takes place through the registration decision rendered by the court.*

From the date of the court's registration decision, the property owner's rights to use the expropriated immovable – such as constructing new buildings, planting crops, or making significant modifications to existing structures – are terminated. Any additions made thereafter are not taken into account in the valuation.

In large-scale infrastructure projects extending over multiple years – such as dams, irrigation systems and pipelines, highways, railways, ports, and airports – the public benefit decision is announced by posting it in the neighbourhood and/or village headman's office where the expropriated properties are located, for a period of fifteen days. From the end of the announcement period of the public benefit decision, any fixed installations made or trees planted on the expropriated properties are not considered in the determination of the expropriation compensation.

This ***cut-off*** *restriction on the immovable properties remains valid for five years from the end date of the public announcement*."

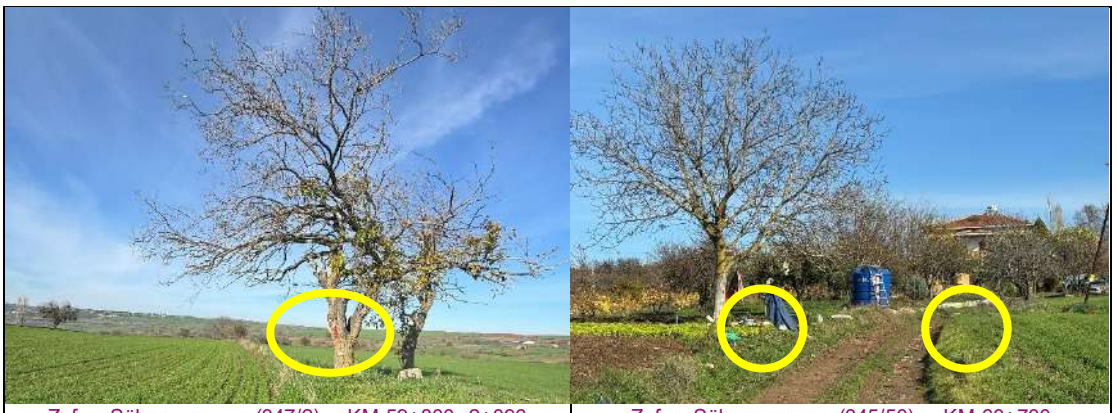
Information Mechanisms under Expropriation Law

The mechanisms through which the people affected by Project-related land acquisition are informed about the asset inventory process and the cut-off date after which newly installed assets will not be compensated are summarised below:

- Turkish Electronic Government Platform: In accordance with Article 7 of the Expropriation Law, annotations related to expropriation are added to the title deeds of affected assets. Asset owners and shareholders can access this information through the Turkish electronic government platform (https://www.turkiye.gov.tr).

- On-site Inventory of Assets Studies: As part of the identification and inventory studies conducted on site in accordance with the Expropriation Law, the boundaries of the expropriation corridor are physically demarcated by field teams using ground stakes. This process serves to clearly define the limits of the affected area.

  During the resettlement scoping field visit carried out by the RAP Consultant Team in December 2025, interviewed affected persons confirmed their awareness of these boundary markers and, consequently, of the expropriation corridor limits.



Zafer, Süleymanpaşa (347/2) – KM 59+800; 2+096 (December 2025)

Zafer, Süleymanpaşa (345/50) – KM 60+700 (December 2025)

Figure 7-1. Examples of Expropriation Markers in Affected Settlements

During on-site inventory studies, local mukhtars and asset owners and shareholders that are present in the affected settlements accompany the field inventory teams. This process involves continuous communication between the appointed national engineering firm (valuation contractor) and affected communities.

During these studies, verbal notifications are given to affected people stating that any assets installed on the affected parcels after the date of the inventory will not be eligible for compensation under the Expropriation Law.

- Disclosure of parcel and owner lists in affected settlements: Through KÖSOB, KGM sends official letters to the Mukhtars of the settlements affected by the Project's land acquisition, informing them of the overall schedule of the Article 8 negotiation meetings to be held with landowners from their settlement. The Mukhtars are requested to post the lists of parcels and owners to be affected by the land acquisition prior to the Article 8 negotiation meetings (see Appendix D for cut-off date disclosure posts in affected settlements).

- Negotiation Meetings and Grievance Mechanism: During the Article 8 negotiation meetings held by KGM in accordance with the Expropriation Law, owners and shareholders are provided with the list of assets subject to expropriation and their valuation.

  Upon agreement with KGM under Article 8, PAPs sign the inventory of assets. A formal grievance mechanism allows affected owners and shareholder to raise objections regarding inaccuracies or omissions in the asset inventory, either during negotiations or afterward. If a grievance is submitted, KGM revisits and reassesses the asset inventory and makes necessary corrections.

- Legal Proceedings for Disagreement Cases: In cases where affected owners or shareholders do not attend negotiation meetings or fail to reach an agreement with KGM, court proceedings are initiated by KGM in accordance with the Expropriation Law.

  The timing of legal action is determined by KGM based on the construction schedule agreed with the SPV and the availability of expropriation funds. Courts revalidate or redo the inventory of assets during the proceedings. Affected owners and shareholders may also raise objections during the judicial process.

Additional Mechanisms adopted by the SPV

To meet the additional requirement of PS5 regarding the disclosure of the **cutoff date and its conditions** (e.g., prohibition on new structures, trees, or crops), the SPV has undertaken the following actions:

- During the RPF studies (December 2025), the SPV has consulted with KGM - KÖSOB regarding previous information dissemination efforts and confirmed that following the completion of the census, asset inventory, and valuation in each settlement[97] and prior to the start of official expropriation procedures through Article 8 negotiation meetings in Section 1 and Section 2, KGM – through KÖSOB – sends official letters to the Mukhtars of the settlements affected by the Project's land acquisition. These letters require Mukhtars to post the lists of parcels and owners to be affected by the land acquisition and inform them of the overall schedule of the Article 8 negotiation meetings to be held with landowners from their settlement. Accordingly, and in line with IFC's recommended "rolling" cutoff date approach, the cutoff date in this Project is settlement-specific and is defined as the date on which the list of affected parcels is disclosed at the Mukhtar's office in each settlement, following completion of the census, asset inventory surveys, and valuation. This applies to both the owners and shareholders of the lands and assets, as well as to their formal and informal users. Table 7-5 lists the cut-off dates announced to date in the affected communities in Sections 1 and 2. This process will continue for the remaining settlements in line with the commencement of expropriation procedures under Article 8.Additionally, during the Article 8 negotiations, legal right holders are provided with the list of assets subject to expropriation and their corresponding valuations. This constitutes the cutoff date at the individual level meetings.

[97] This is applicable to Section 1 and Section 2, as the Article 8 procedures in Section 3 had already been completed by the tim e the RPF studies commenced in October 2025.

This notice included the following information (see Appendix D):

- Date of the formal expropriation decision for the relevant sections of the Project
- The date on which the list of affected land parcels was publicly disclosed (e.g., posted at the offices of the local mukhtar in relevant neighbourhoods and/or villages), along with the duration of the disclosure period
- Confirmation that this public disclosure date constitutes the cut-off date for eligibility for compensation and resettlement assistance under the Project
- Clarification that any structures constructed, crops planted, or improvements made to assets after the cut-off date will not be eligible for compensation, as such additions will not be included in the valuation process. This includes new structures, trees, crops, or other immovable assets established after the cut-off date, as well as improvements to existing assets (In line with the principles set out in Article 25 of the Expropriation Law)
- A note that affected persons will receive individual written notifications, and that land acquisition processes will be carried out in full compliance with applicable national legislation

Table 7-5. Cut-off Dates Disclosed by the Project in Section 1 and Section 2 as of July 2026

Section	District	Neighbourhood	Cut-off Date
Section 1: KM 0 -35	Silivri	Sancaktepe	24 March 2026
		Balaban	24 March 2026
		Değirmenköy	20 January 2026
		Gümüşyaka	20 January 2026
	Marmaraereğlisi	Sultanköy	20 January 2026
		Cedit Ali Paşa	20 January 2026
		Yakuplu	6 April 2026
	Çorlu	Seymen	20 January 2026
		Şahpaz	6 April 2026
Section 2: KM 35 – 70	Süleymanpaşa	Kayı	11 February 2026
		Zafer	11 February 2026
		Eskicami	11 February 2026

- In **Section 3**, the SPV will post notifications in the affected settlements, in alignment with the construction schedule and priorities (starting from August 2026), to inform affected people that crops cultivated on parcels after the completion of expropriation under Article 8 or Article 10 (or Article 27 should this is applied in the Project) will not be eligible for additional compensation (i.e. crop payment), as these parcels have been formally allocated to the Project and avoid new cultivation on parcels for which expropriation procedures have already been completed (through Article 8 or 10, or Article 27 should this is applied in the Project) during the current agricultural production period.
- The SPV acknowledges that the cutoff date disclosed to the communities will not prevent the registration of individuals or groups who have legitimate claims to land, assets, or the use of natural resources in the Project footprint – including those who might be absent when the cutoff date is declared, such as absentee families or family members who may be engaged in seasonal or migrant labour elsewhere, inside or outside İstanbul and Tekirdağ, etc.
- As part of its ongoing engagement with affected communities, the SPV informs affected persons that they will be separately notified regarding the Project and the expropriation schedule. They are also advised that they may continue their livelihood activities until the Project secures land access rights (through Article 8, Article 10 – direct, or Article 27), compensation measures are agreed upon, and notice is provided requiring the cessation of Project-affected activities.
- The SPV captures **photogrammetric imagery** of the route to establish the baseline conditions. These baseline and updated images serve as a tool to verify and investigate claims related to assets constructed or planted after the cut-off date.

- The cut-off date for compensation eligibility of affected businesses and their employees will be formally declared during or in parallel to the consent negotiations to be held under Article 8 of the Expropriation Law.
    - For owners of the affected business structures – during negotiations
    - For tenant business owners and both formal and informal employees – in parallel to negotiations

  All formal and informal employees present at the time of the cut-off date declaration will be considered eligible for compensation.

The cut-off dates for affected settlements are provided in Appendix D.

7.3. Entitlement Matrix

Entitlements for the owners and/or users of affected land, houses, special-use assets, and businesses, including those identified as vulnerable persons, are presented in Table 7-6.

For all relevant entitlements included in the Entitlement Matrix, the following provisions apply. These provisions are not repeated within the Matrix to avoid redundancy; therefore, the Entitlement Matrix should be read in conjunction with the provisions outlined below.

- To inform the affected people about the entitlements under RAP and the delivery conditions, **GLAC** will be distributed to PAPs, following approval of this RAP by the Lenders. The GLAC will clearly inform PAPs of the entitlements applicable to each eligible PAP category.
- For **affected lands**, the GLAC will clearly inform the PAPs about the costs (such as small costs, transaction costs, etc.) eligible for reimbursement, provided that evidence of expenditure or relevant documentation is submitted. If not agreed with the PAPs otherwise, the SPV will reimburse transaction costs after they incur based on the evidence of expenditures that will be requested from PAPs prior to payment. PAPs will be requested to contact the SPV using the details provided in the GLAC to submit the necessary documentation and their bank account information for payment processing. The SPV will reimburse the verified costs within **15 calendar days** following receipt of the required documents from each PAP.
- **For affected houses,** the SPV is fully committed to implementing the necessary measures to ensure that no homeowner – including those under co-ownership arrangements or informal land users RAP– is left without a house. In this regard, the measures set out in this RAP will be implemented, and where necessary, alternative methods (such as compensation for additional temporary accommodation or others) will be developed in consultation with KGM, the affected people, and the Lenders during RAP implementation. For **affected houses**, the GLAC will inform eligible persons that evidence of expenditure – such as relevant documentation of agreements with moving or logistics firms and related costs – must be properly retained. The SPV will closely follow the planning and execution of the moving process with the eligible persons, providing guidance and coordination regarding expenditures and their proper documentation. Prior to relocation, the SPV will assist eligible persons in submitting the necessary documentation for the advance approval of payable or reimbursable moving and travel costs.
- For **affected business owners**, the GLAC informs the business owners that evidence of expenditure/relevant documentation (e.g. hiring real estate agency, moving/logistics firms, expenditures, etc. related to relocation process are required to be properly kept. The SPV will follow-up the planning and execution of moving processes closely with the business owners (e.g. hiring real estate agency, moving/logistics firm for disassembly-assembly, etc.) and advise and coordinate expenditures and their proper documentation. If the moving costs are to be reimbursed after they incur, the SPV will approve the expenditure in advance and evidence of expenditures will be requested from business owners prior to payment.
- During the distribution of GLAC, the SPV will inform PAPs about the expropriation and RAP processes, as well as, where possible, the anticipated Project implementation timelines.
- The SPV will establish mechanisms to ensure that eligible expenses (e.g. moving costs, transaction fees, minor administrative expenses) are covered in a manner that does not impose financial hardship on affected individuals or businesses. Where it is required and such costs can be reasonably determined in advance – for example, relocation or transportation expenses supported by quotations from service providers (to be collected either by the SPV/EPC or by the affected people, whichever is appropriate and practical) and subsequently approved by the SPV – the SPV will ensure that the invoices are issued directly in the name of the SPV or EPC, whichever is appropriate. Where possible, the Project will make direct payments to vendors on the basis of these quotations. The SPV will coordinate the process among affected people and relevant vendors prior to the costs being incurred, ensuring consistency with corporate policies and procedures governing administrative affairs and procurement. This approach aims to avoid delays and to ensure that no eligible person is excluded from receiving timely support and to avoid situations where affected people are left to cover large or unexpected payments themselves.

- In cases where costs must be **reimbursed** – for example, when affected people prefer to pay first and later seek reimbursement (such as for minor expenses where this may be more practical) – the SPV will process payments only upon submission of the required supporting documentation. No advance payments will be made without such documentation. Affected people will be informed of these requirements and coordinated in advance in alignment with the corporate policies and procedures regarding management of administrative affairs and procurement processes, as summarised below and further detailed throughout the RAP.

- **All payments from the RAP Fund will be made by the SPV** directly to the bank account of the eligible persons/entities or to an account designated by the eligible persons/entities in cases where they do not have an active bank account or face obstacles in receiving payments that could hinder the alignment of the resettlement process with this RAP and Lenders' requirements. Bank receipts will be retained by the SPV to document the transactions. Where payments are to be made to an account designated by the eligible person/entity (e.g. a spouse or another family member), written consent from all relevant parties will be obtained and documented.

- Assistance to **informal land users and vulnerable individuals** affected by the Project will be provided proactively, before or simultaneously with the occurrence of impacts, in order to mitigate or eliminate those impacts.

- For **vulnerable individuals**, where possible, the SPV – RAP Implementation Team will seek to provide non-cash support mechanisms (e.g., logistical and administrative assistance) to elderly persons, persons with disabilities, women-headed households, and other vulnerable groups, ensuring that costs such as travel expenses are not incurred and borne by vulnerable individuals. To this end, site based Project personnel (e.g. CLOs, expropriation team members, etc.) will provide assistance to individuals with specific vulnerabilities throughout the compensation and payment process. Such support may include accompanying individuals to the bank, assisting with e-state or online banking transactions where needed, supporting the preparation of documentation required for withdrawal of payments, following up on deposit transactions, and assisting with the withdrawal of compensation amounts deposited by KGM. Where necessary, the SPV may also make payments directly on behalf of vulnerable individuals in order to prevent them from bearing additional expenses or facing undue hardship during the resettlement process.

- Some RAP support measures may be conditional in nature and therefore may not be provided simultaneously with other forms of assistance. For example, rental assistance may be provided to user PAPs upon identification of replacement land or title deed transaction costs may be covered in cases where a replacement house is purchased. For such cases, PAPs will have the right to apply for and request any outstanding RAP assistance within 6 months following their receipt of expropriation compensation from KGM and notification by the SPV regarding the available RAP support measures. Assessment of applications submitted after the 6-month period will be at the sole discretion of the SPV.

- Individuals whose **livelihoods** are land-based and who use 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 LRP related entitlements and livelihood restoration and improvement measures defined in this RAP, in proportion to the level of impact experienced.

- Where required to achieve full replacement cost, **depreciation** costs will be covered by the SPV through the RAP Fund for the structures used for residential or economic purposes, including houses, barns, sheds, depots, pools, wells, and immovable components of irrigation and drainage systems. For such structures, depreciation may be significant and may affect the ability of PAPs to replace the affected asset at current market conditions. This may not be the case for other assets such as fences, walls, and similar minor structures as well as structures that are ruin or abandoned that do not have any residential or economic use.

- In cases where the affected assets are **movable** and can be relocated within or outside the premises with the moving support provided by the SPV under RAP Fund, **no depreciation payment will be provided by the SPV,** as depreciation support is intended to enable replacement of affected immovable structures

- Project's grievance mechanisms will be part of each entitlement defined in the Entitlements Matrix presented in Table 7-6. Through ongoing monitoring, engagement with land owner and users (formal and informal), and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis.

Table 7-6. Entitlements Matrix

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(i)	**Affected Lands**				
(i)1	**Permanent loss of private parcels** – agricultural parcels and urban plots[98] (excluding litigious parcels)	Owners/ shareholders	**2,253 privately-owned parcels** within Motorway's expropriation corridor: - Section 1: 1,068 parcel - Section 2: 747 parcel - Section 3: 438 parcel **~22,633 landowners:** - Section 1: 11,371 - Section 2: ~10,000 - Section 3: 1,262	Compensation: Cash compensation for affected land is provided by the KGM in accordance with the Expropriation Law. Replacement Land: The Expropriation Law allows for replacement land; however, this option is generally not preferred by KGM due to the high volume of parcel acquisitions, the limited availability of land, and the difficulty in prioritising requests. Valuation: Valuation rates for land and assets will be updated by KGM at least annually. Transaction costs (such as registration, taxes, time lost, cost of transport) may be considered in the valuation but not separately itemised. Negotiations: During Article 8 negotiations, which are based on valuation reports, landowners have the right to either accept or reject the proposed compensation amounts. Agreement: If a consent agreement is reached through Article 8 between KGM and the landowner, the agreed compensation amount is paid by KGM within **45 days** following the execution of the agreement protocol. If owners/shareholders do not receive the mandatory cash compensation (expropriation cost) within the period specified in the Expropriation Law (i.e., within 45 days following the execution of the agreement protocol under Article 8) due to delays caused by KGM, KGM is required to pay legal interest for the period between the due date and the actual payment date – **provided that the individual files a claim with the court.** No agreement/disagreement case: A court process is initiated under Article 10 or Article 27 followed by Article 10 to determine the compensation through court-appointed experts. The final expropriation value is paid upon the conclusion of the court proceedings. Orphan land: Please refer to (i)5.	1) Early Consultations and Notification for Land Acquisition Process: The landowners are notified formally by KGM prior to Article 8 meetings – approximately **3 months** in advance of land entry. Please see item 6 for information and notification activities by the SPV. Land entry by the Project will only proceed once expropriation (or land seizure decision in case of Article 27) is finalised or valid consent protocols with landowners have been concluded. 2) Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability, if requested by the PAP. 3) Top-up Cash Compensation to Achieve Full Replacement Value for Land: **- Article 8 agreement case**: KGM will conduct negotiations based on the current valuation rates and will update the valuation rates for land and assets at least annually. **- Article 10 or 27 court cases**: The final expropriation value will be determined by the court. No top-up cash compensation will be provided by the SPV for the land. If replacement land of similar quality, size, and location is identified by the PAPs using the land, the **transaction costs**[99] applicable to the acquisition of replacement of equivalent value will be paid by the SPV after the transaction is completed within a reasonable timeframe after expropriation and no later than 6 months after receipt of the expropriation compensation by the PAP. 4) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the **"(i)11 – Loss of Non-residential Structures and Infrastructure**" and (ii) – Affected Residential Structures (Houses). 5) Cash Compensation for Crops and/or Trees of **Formal** Land Users: Please refer to the **"(i)9 for Loss of Crops"; (i)10 for Loss of Trees and Perennial Crops.** 6) Small costs in relation with Official Procedures for Land Acquisition: There may be various expenses and travel costs related to deed transfer in negotiated settlements that are not covered by KGM, as they are not stipulated under the Expropriation Law. These costs, which must be borne by landowners, will be covered by the SPV from the RAP Fund provided that the expenses are properly documented. Costs to be covered – based on documented evidence of expenditure and related to negotiations and title deed transactions – are listed below: ○ Costs related to inheritance and succession resolution including working capital fund ("*doner sermaye*") to be paid per parcel, notary costs related to inheritance certificates, power of attorney costs ○ Inner city transportation costs ○ Inter city transportation costs Taxes and statutory payments that PAPs are legally required to pay to the state due to personal legacy issues are not considered within the scope of small cost assistance. 7) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions (please refer to Chapter 10). 8) Livelihood Restoration, Improvement and Assistance: If the owner/shareholders use the affected land for agricultural production – regardless of whether they purchase new land – and their land-based livelihoods are affected, they will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
(i)2		Formal Users (Tenants) – with formal tenancy agreements	**~916 land users (formal and informal):** - Section 1: 326 - Section 2: ~310 - Section 3: 280 Please refer to Table 3-19 for land users for Section 1 and Section 3 – with	**No compensation for land** is provided to land users under the Expropriation Law. However, **formal tenants** are eligible for compensation for crops, trees, and any structures or fixed improvements/investments on the rented land, provided they can demonstrate ownership of these crops and assets. **Depreciation** will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the **user** at least **3 months**[100] in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. 2) Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed. 3) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the "(i)11 – **Loss of Non-residential Structures**" and (ii) – Affected Residential Structures (Houses) for assets made or owned by the **formal** user on the affected land during the tenancy.

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

[99] It is the responsibility of the PAPs to ensure that the declared transaction value of replacement land, housing, or other assets is accurate and compliant with applicable legislation. The SPV will cover eligible transaction costs on a one off basis and solely based on the officially declared transaction value at the time of the transaction. Any additional taxes, duties, penalties, interest, retroactive assessments, correction costs, or other liabilities arising from under declaration, misrepresentation, or subsequent reassessment by the competent authorities shall remain the sole responsibility of the PAPs.

[100] Wherever possible, the SPV will seek to extend the notification period and make early notifications six months prior to land entry. If this cannot be achieved, any losses experienced by landowners or by formal or informal land users will be compensated by the SPV. This applies to all *Early Consultations and Notification for Land Acquisition Process* entitlements included in the Entitlements Matrix.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			breakdown of formal and informal		4) Transitional rental allowance for formal replacement land to be rented (for 1-year) (part of LRP): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land. The support amount will be determined proportionally to the affected area and with consideration of the crop type. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year. 5) Cash Compensation for Crops and/or Trees of **Formal** Land Users: Please refer to the **"(i)9 for Loss of Crops"; (i)10 for Loss of Trees and Perennial Crops.** 6) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions. 7) Livelihood Restoration, Improvement and Assistance: The land user – if her/his land-based livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
(i)3		Informal Users – with **no** formal tenancy agreements or official documentation	Please refer to Table 3-19 for land user for Section 1 and Section 3.	**No compensation for land** is provided to land users under the Expropriation Law. However, **informal** users are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at **minimum material cost**, in accordance with **Article 19** of the Expropriation Law, provided they can demonstrate ownership of these assets. **Depreciation** will be applied for structures in accordance with the depreciation ratios set out in the relevant Turkish legislation.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. **(same entitlement with formal user)**. 2) Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed **(same entitlement with formal user)**. 3) Cash Compensation at Full Replacement Value for Structures on Affected Land: Please refer to the "(i)11 – **Loss of Non-residential Structures**" and (ii) – Affected Residential Structures (Houses) for assets made or owned by the **informal** user on the affected land. 4) Transitional rental allowance for formal replacement land to be rented (for 1-year) (part of LRP): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, cost of transport, etc.) of the lost agricultural land. The support amount will be determined proportionally to the affected area and with consideration of the crop type. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year **(same entitlement with formal user)**. 5) Cash Compensation for Crops and/or Trees of **Informal** Land Users: Please refer to the **"(i)9 for Loss of Crops"; (i)10 for Loss of Trees (same entitlement with formal user)**. 6) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions **(same entitlement with formal user)**. 7) Livelihood Restoration, Improvement and Assistance: The land user – if her/his land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 **(same entitlement with formal user)**.
(i)4	**Litigous properties** ("*ihtilaflı bulunan mülkiyet*")	Litigants claiming to be rightful owners/ shareholders of litigious properties Note: For the users of litigious parcels, if any, please refer to entitlements outlined for formal and informal users under **"(i)1 for Permanent loss of private parcels".**	**3 litigious parcels** within Motorway's expropriation corridor: - Section 1: 0 - Section 2: 3 • Aydoğdu 325/16 and 325/18 – no residential or commercial structure • Yağcı (0/88) – no residential or commercial structure - Section 3: 0	When there is a court dispute regarding the ownership of a parcel (i.e. a litigious parcel), the rightful owners or shareholders eligible for compensation under the Expropriation Law are determined by the court in accordance with Article 18 of the Law. Please refer to Appendix G for the full definition of Article 18, which stipulates, among others, determination of the expropriation value of the immovable property following the procedure set out in Article 10, and, after this amount is deposited by the administration in the bank specified by the court in a three-month term deposit account in accordance with Article 10 for payment to the rightful owner to be determined upon conclusion of the ownership dispute. In cases where the expropriation follows the procedure outlined in Article 10 or 27 (accelerated expropriation), the final expropriation compensation becomes accessible to the owners/shareholders – whose eligibility has been confirmed by the court under Article 18 – only after the completion of the Article 10 process (which follows the Article 27 process in case of accelerated expropriation). If the court rules in favour of the state/treasury, litigious owners/shareholders become illegal occupants.	1) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform the litigants claiming to be rightful owners/shareholders of litigious properties about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions. Litigants claiming to be rightful owners/shareholders of litigious parcels that contain houses, structures or business structures will be consulted individually to identify any specific vulnerabilities. The SPV will monitor the court proceedings to mitigate any potentially exacerbated impacts arising from lengthy legal procedures. Tailored measures will then be designed and implemented by the SPV on a case-by-case basis. **(*)** All entitlements defined for owners under **"(i)1 for Permanent loss of private parcels**" will apply to litigants claiming to be rightful owners/shareholders **whose eligibility for compensation under the Expropriation Law has been validated by the courts through the Article 18 process**. These entitlements including any compensation and/or assistance will be delivered by the SPV to the validated rightful owners/shareholders upon completion of the Article 10 process.
(i)5	**Orphan lands and fragmented parcels**	Owners/ shareholders	Please refer to Section 3.1.2 for orphan lands.	Minimisation of orphan lands: The expropriation boundary for the Project has been established by KGM with consideration of the remaining portions of the affected parcels. In cases where the residual area is insufficient for viable use	1) In accordance with the Expropriation Law, the owner/shareholder of the affected parcel has the right to officially apply to KGM and request acquisition of the remaining part of the expropriated parcel.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation

		Note: For formal (tenants) and informal users please refer to **"(i)1 – Permanent loss of private parcels".**	Please refer to Section 3.1.3 for fragmented parcels	– either due to its limited size or its unsuitable geometry – the boundary has been revised to encompass the entire parcel, where feasible. To this end, a parcel-based review and assessment covering the full alignment was carried out by KGM and the valuation contractor.
				
				Right to apply for acquisition of orphan lands: For the unacquired portions that were not previously included in KGM's expropriation, the owner or shareholder of the affected parcel has the right to formally apply to KGM, in accordance with Article 12 of the Expropriation Law, to request the acquisition of the remaining part of the parcel if it is deemed economically unusable or undevelopable.
				
				For all parcels, in line with the Expropriation Law and KGM's established practice, KGM accepts official applications from affected people – submitted within **30 days** of receiving notice of expropriation by agreement – requesting the expropriation of orphan lands and evaluates each application on a case-by-case basis.
				
				KGM reviews official applications submitted by PAPs requesting the expropriation of orphan lands, provided that the remaining areas are in line with KGM's criteria for unviable land acquisition criteria.
				
				Each application may not necessarily be approved by KGM; however, the owner or shareholder retains the right to seek legal remedy through the courts.
					The SPV will inform the PAPs about their legal rights as described in this RAP (through distribution of KGM's booklet on procedural steps of expropriation and GLAC and during PAP meetings to be held prior to Article 8 negotiations) and provide assistance in their official applications (if this is preferred by the PAPs) to KGM or in other processes as required.
					
					In case the acquisition request of the owner/shareholders is not concluded positive by KGM, the SPV will commission a third-party valuation expert to review the case and determine the actions required to be taken by SPV, if any.
					
					If no agreement is reached under Article 8, the expropriation will proceed through judicial processes (Article 10, or Article 27 followed by Article 10) as outlined in Section 4.2.2. In this case, the final decision for acquisition of the remaining part of the expropriated parcel will be executed by the courts. Where deemed necessary, the courts would award compensation for diminution in value.
					
					During Project implementation, the SPV will implement the SEP, including the grievance mechanism, and will maintain ongoing engagement with the affected people, including users of orphan parcels. Economic displacement impacts arising from such orphan lands will be monitored by the SPV throughout RAP implementation, relevant requests submitted by landowners to KGM through petitions will be periodically reviewed by the SPV as part of the Project's grievance mechanism and any related grievances or losses will be managed primarily on a claim basis or proactively where necessary. This approach will be operationalised through the Project's grievance mechanism and implementation of livelihood restoration and assistance measures set out in this RAP.
					
					During the RAP implementation, the SPV, with support from the EPC's Expropriation Team, will review orphan parcels and identify their owners and agricultural users on a parcel-by-parcel basis, in line with the expropriation and construction programmes. Based on the review of court decisions (Article 10 or Article 27 where this is applicable), and in coordination with KGM, the SPV, with support from the EPC's Expropriation Team, will monitor the requests submitted by landowners to KGM through formal petitions, the outcomes of KGM's review and any resulting actions (e.g. official responses issued by KGM to formal requests or other actions taken by KGM, where applicable), and compensation awarded by the courts for such impacts under the official expropriation procedures. Accordingly, the SPV will review and assess the outcomes of the completed official procedures, taking into account any grievances received through the Project's Grievance Mechanism, and, where necessary, develop and implement parcel based corrective actions (e.g. provision of compensation for the unacquired portion of a parcel where the remaining land is determined to be economically unviable or unsuitable for development, additional land acquisition proposal to KGM, etc.). To support this process, where necessary, the SPV will engage a third-party valuation expert, who has agricultural engineering or economy background and expertise in valuation of agricultural properties using net income method, to review each case/claim individually and determine the actions required to be taken by SPV, if any (e.g. provision of compensation for the unacquired part in case the unacquired part is economically unusable or undevelopable). A parcel-based **Technical Assessment on Net Income Loss Calculation arising from Restricted Access to Residual Parcels** will be conducted by the expert to determine the payable RAP compensation rates.
					
					In cases where a zoning parcel (if any) has already undergone road relinquishment and there are claims or grievances raised by relevant PAPs, the SPV will commission a third-party valuation expert to ensure a fair assessment of value reduction in the remaining part and advise the KGM accordingly. The third-party valuation expert will be supported by the Project's technical and design teams to incorporate technical specificities into the assessments.
					
					All other entitlements defined for the owners/shareholders "Permanent loss of private parcels" are applicable to the owner/shareholders of the orphan lands.
					
					2) Implement Severance Management Plan (SEVMP): The SPV has developed a **SEVMP**[101], which was approved by the LESA in Octoeber 2025, to ensure the effective integration of underpasses and overpasses into the Project and accordingly mitigate the economic and access severance impacts associated with the development of the Motorway. The SPV will implement the SMP, including the following measures:
					
					• The Project will conduct broad consultations with the PAPs, affected communities, and other interested stakeholders. Detailed visual materials and KMZ files of the route will be shared with local communities to gather their feedback, particularly regarding underpasses in settlements and potential barriers to access ecosystem services. Their input will be incorporated into the further detailed design and mitigation measures of the Project.
					• Safe pedestrian crossings will be designated with clearly marked pathways, adequate lighting, and, where feasible, pedestrian overpasses or underpasses.
					• Strategically located crossings (overpasses or underpasses) will be planned and constructed at intervals that allow easy access to ecosystem services, lands, and other essential resources.
					• In order to assess and eliminate potential hazards regarding the use of underpasses and overpasses built for traffic, pedestrians, and livestock, the following measures will be implemented:
					  ○ Regular checks will be conducted for visibility, lighting, and drainage issues, particularly after heavy rainfall.
					  ○ Routine maintenance will be carried out to address lighting, drainage, and structural issues.
					  ○ Safe interaction between vehicles, pedestrians, and livestock will be monitored and managed.

(i)6	**Permanent loss of state-owned parcels (treasury, non-registered)**	Owners	Governmental institutions	Treasury lands and unregistered parcels are allocated to the Project upon KGM's application, without any payment.	-
		Formal Users – with official documentation	Please refer to Table 3-19 for land user for Section 1 and Section 3.	**No compensation for land** is provided to land users under the Expropriation Law.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV.

[101] The SEVMP has been disclosed[101] by the SPV on the Project website in Turkish and English Turkish: https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-bolunmesi-yonetim-plani.pdf; English: cok-severance-management-plan.pdf

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	– which are used for **agriculture or other income generating activities**		The formality of their use of state-owned parcels must be verified through official documentation, such as proof of adequate pay/occupation fee (“*ecrimisil*”) as applicable.	However, **formal users of state-owned lands** (e.g. treasury parcels) are eligible for compensation for crops, trees, and any assets or fixed improvements/ investments (such as structures), provided they can demonstrate ownership of these crops and assets. **Depreciation** will be applied for structures of formal users with official documentation in accordance with the depreciation ratios set out in the relevant Turkish legislation.	2) Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed. 3) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Please refer to the “(i)12 – **Loss of Non-residential Structures**” and (ii) – Affected Residential Structures (Houses) for assets made or owned by the **formal** user on the affected land. 4) Transitional rental allowance for formal replacement land to be rented (for 1-year) (as part of LRP): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year** rental fee (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land. The support amount will be determined proportionally to the affected area and with consideration of the crop type. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year. 5) Cash Compensation for Crops and/or Trees of **Formal** Land Users: Please refer to the **“(i)9 for Loss of Crops”; (i)10 for Loss of Trees.** 6) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions. 7) Livelihood Restoration, Improvement and Assistance: The land user – if her/his land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8**.**
		Informal Users – with no official documentation	**12 PAPs** within Motorway’s expropriation corridor: - Section 1: 6 - Section 2: TBD - Section 3: 6	**No compensation for land** is provided to land users under the Expropriation Law. However, **informal** users – **excluding those occupying forest and pasture lands** – are eligible for compensation for trees and structures (e.g., fixed improvements/ investments) on the land they use informally at **minimum material cost**, in accordance with Article 19 of the Expropriation Law, provided they can demonstrate ownership of these assets. To date, no structures subject to compensation at the minimum material cost under Article 19 have been identified under the Project. Should any such cases be identified, KGM – KÖSOB intends, at its sole discretion, to pay the full value of the affected structures after deducting depreciation. Informal users of forest and pasture lands are considered as **illegal occupants (“*işgalci*”)**, are not entitled to any form of legal compensation for either the land or the assets.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV **(same entitlement with formal user)**. 2) Replacement Land Search Support: The SPV will assist in searching replacement land that is of similar quality, size, and location, subject to availability. The SPV will facilitate and support coordination with relevant authorities and institutions, as needed **(same entitlement with formal user)**. 3) Cash Compensation at Full Replacement Value for Structures on Affected Land: Please refer to the “(i)12 – **Loss of Non-residential Structures**” and (ii) – Affected Residential Structures (Houses) for assets made or owned by the **informal** user on the affected land. 4) Transitional rental allowance for formal replacement land to be rented (for 1-year): If the user finds replacement land for formal lease, the SPV will provide **one-off** transitional support equivalent to the **1-year rental fee** (including any transaction costs such as new tenancy registration, fees to the authorities, etc.) of the lost agricultural land. The support amount will be determined proportionally to the affected area and with consideration of the crop type. The rental allowance will be calculated based on the maximum market rental rates recorded in the national Farmer Registration System for the relevant year **(same entitlement with formal user)**. 5) Cash Compensation for Crops and/or Trees of **Informal** Land Users: Please refer to the **“(i)9 for Loss of Crops”; (i)10 for Loss of Trees (same entitlement with formal user)**. 6) Soft Support (Enhanced Information, Notification, Guidance, Logistical or Administrative Support): The SPV will conduct consultation meetings to inform PAPs about the land acquisition process, as well as their rights and entitlements under this RAP. GLAC will be distributed individually to each user to ensure clarity and transparency regarding these provisions **(same entitlement with formal user)**. 7) Livelihood Restoration, Improvement and Assistance: The land user – if her/his livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 **(same entitlement with formal user).**
	Permanent loss of pasture lands	Users of registered pasture parcels **within expropriation corridor** or **at the footprint of facilities outside the corridor**	**13 pasture parcels (9 state – common property + 2 legal entity + 2 private)** within Motorway’s expropriation corridor (Section 3.1.1.1 an Section 3.1.1.2): - Section 1: **4** • Seymen (53/1 and 54/3) • Çeşmeli (188/76 and 185/37) - Section 2: **3** • Kayı (0/1111) • Yağcı (0/41 and 0/101)	Payments for pasture lands as required by Pasture Law are made by KGM to the Treasury. No compensation is provided to the communities for the loss of grazing lands unless the pastures are registered in the name of the village legal entity, in accordance with the Turkish Expropriation Law.	1) Replacement Land Search Support: The SPV will assist communities experiencing significant loss of pasture land (as outlined in Section 3.1.1.1 and Section 3.1.1.2) and lacking sufficient alternative grazing areas, through settlement heads, in identifying alternative grazing land of comparable quality, size, and location, in coordination with the relevant authorities. 2) Livelihood Restoration, Improvement and Assistance: The land (pasture) users – if her/his land-based livelihood are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8 **(same entitlement with formal user),** which would be tailored to compensate impact on grazing activities. 3) Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			- Section 3: **6** • Seymenli (107/74 and 407/77) • Güveçli (109/34) • Nusratfaki (107/26 and 119/2) • İnecik (161/7)		
(i)7	**Restriction of access** to grazing lands located out of Project expropriation corridor (public or private) **due to fragmentation** or other Project-related factors	Users of grazing lands exposed to access restriction impacts	List of **fragmented** land parcels – Table 3-11 **45 meadow parcels** within Motorway's expropriation corridor: - Section 1: 2 parcels - Section 2: 37 parcels - Section 3: 6 parcels	No compensation is provided to the communities for restriction of access.	1) Implement Severance Management Plan (SEVMP): The SPV has developed a **SEVMP**[102], which was approved by the LESA in Octoeber 2025, to ensure the effective integration of underpasses and overpasses into the Project and accordingly mitigate the economic and access severance impacts associated with the development of the Motorway. The SPV will implement the SMP, including the following measures: • The Project will conduct broad consultations with the PAPs, affected communities, and other interested stakeholders. Detailed visual materials and KMZ files of the route will be shared with local communities to gather their feedback, particularly regarding underpasses in settlements and potential barriers to access ecosystem services. Their input will be incorporated into the further detailed design and mitigation measures of the Project. • Safe pedestrian crossings will be designated with clearly marked pathways, adequate lighting, and, where feasible, pedestrian overpasses or underpasses. • Strategically located crossings (overpasses or underpasses) will be planned and constructed at intervals that allow easy access to ecosystem services, lands, and other essential resources. • In order to assess and eliminate potential hazards regarding the use of underpasses and overpasses built for traffic, pedestrians, and livestock, the following measures will be implemented: o Regular checks will be conducted for visibility, lighting, and drainage issues, particularly after heavy rainfall. o Routine maintenance will be carried out to address lighting, drainage, and structural issues. o Safe interaction between vehicles, pedestrians, and livestock will be monitored and managed. 2) Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional engineering (crossing) structures where feasible and necessary. 3) Livelihood Restoration, Improvement and Assistance: In the event of access restriction impacts, the land users – whose land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on grazing activities.
(i)8	**Loss of forest parcels** – for the compensation of **structures, trees or houses on forest lands**, please refer to relevant rows[(ii)2)]	Users of forest parcels **within the expropriation corridor** or **at the footprint of facilities outside the corridor**	**27 forest parcels** within Motorway's expropriation corridor: - Section 1: 0 - Section 2: 0 - Section 3: **27** (see Table 3-7 for the forest parcels in Seymenli, Güveçli, Karahisarlı, İnecik, Akçahalil, Kınıklar and Yenice) There are fruit trees on forest lands in Karahisarlı (163/1)	Forest permits are obtained by KGM in accordance with the provisions of the Forest Law.	There are no **houses or major structures forest lands on forest lands.** If any, structures or trees are not compensated by KGM in accordance with the law. For the compensation and assistance to be provided by the SPV through this RAP, please refer to relevant rows **(Affected Trees, Affected Houses)** in this Entitlements Matrix. The following applies to the **users of forest** for other formal or informal economic activities (such as grazing, collecting products), if any: 1) Monitoring, Grievance Management and Corrective Measures: Through ongoing monitoring, engagement with land users, and use of the Project grievance mechanism, potential impacts or issues, if any, will be identified. As required, the SPV will plan and implement corrective measures on a case-by-case basis – for example, by providing additional crossing structures where feasible and necessary. 2) Livelihood Restoration, Improvement and Assistance: In the event of access restriction impacts, the users of forest for economic activities – whose livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, which would be tailored to compensate impact on forest lands.
(i)9	**Loss of crops**	Owners of the crops – owner or formal/informal user of the land		According to Article 20 of the Expropriation Law, the evacuation of cultivated lands that are subject to expropriation must take place after the harvest period. If land entry occurs before harvesting, the crop owners are entitled to compensation. In practice, crop compensation is not included in the valuation conducted by KGM under the Expropriation Law. KGM complies with Article 20, or – for BOT projects – requires the private partner to fulfil the requirements of Article 20 in cases where land entry occurs before the harvesting period.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV **(same entitlement with formal and informal land user)**. 2) Cash Compensation for Crops of **Formal** or **Informal** Land Users: In the case of cultivated lands, if land entry by the EPC Contractor is required before the harvesting period, the SPV will ensure that payments for crops and products (e.g., fruits) are made to the **owners** of the crops and trees **prior to land entry**. These payments will be documented through protocols and bank transactions. Any crops cultivated on the parcels expropriated through Article 8 or Article 27 (or parcels for which a land seizure decision has been obtained where Article 27 is applied) **after the completion of expropriation will not be eligible** for compensation, in accordance with the principles of the Expropriation Law and the requirements of IFC PS5.

[102] The SEVMP has been disclosed[102] by the SPV on the Project website in Turkish and English Turkish: https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-bolunmesi-yonetim-plani.pdf; English: cok-severance-management-plan.pdf

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					Where the construction schedule allows affected people to cultivate and harvest crops for an additional season after the completion of the expropriation process, the Project may, at its sole discretion, grant them the right to continue cultivation for a temporary period to be agreed. This will be individually and mutually agreed with the land users and the mutual agreement will be formally documented by the SPV, including the authorised cultivation period, to minimise the risk of unsubstantiated compensation claims arising from cultivation beyond the mutually agreed period. 3) Livelihood Restoration, Improvement and Assistance: The land users – if her/his land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
(i)10	**Loss of trees and perennial crops** (fruit or non-fruit trees)	Owners of the trees - owner or formal/informal user of the land	Please refer to Appendix C for loss of trees. - Section 3: 3 parcels • Seymenli (108/5) • Karahisarlı (103/1 and 163/1)	Valuation: In accordance with the Expropriation Law, cash compensation is provided by KGM to the owner of the trees on private lands or public lands used formally. The valuation of agricultural trees is carried out in line with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables according to the following provisions specified under the "Land, Crop, Tree, and Asset Value": "*The value of annual crops and fruit-bearing or non-fruit-bearing trees on the land is assessed using either the cost or income approach, depending on the development stage of the respective plants. In particular, for fruit-bearing and non-fruit-bearing trees, the value of each tree or tree age group is calculated individually based on income, and the methodology used for this calculation is explained in full detail in the reports*". Trees owned by informal land users: Pursuant to Article 19 of the Expropriation Law, when trees are located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, compensation is paid to the **possessor** of the trees. This does **not** apply to trees on forest or pasture parcels.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the user at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV **(same entitlement with formal and informal user)**. 2) Cash Compensation for Trees on Forest and Pasture Lands: If there are trees owned by **informal users on affected forestry or pasture lands**, which are not subject to compensation by KGM, the compensation at Full Replacement Cost will be determined by the SPV (based on the prices adopted in the valuation of trees on private parcels). Cash compensation reflecting this value will be provided to the informal users by the SPV from the RAP Fund. 3) Cash Compensation for Produce/Fruits of **Formal** or **Informal** Land Users: In the case of produce/fruits on affected trees (with yielding produce), if land entry by the EPC Contractor is required before the harvesting period, the SPV will ensure that payments for products (e.g., fruits) are made to the **owners** of the trees **prior to land entry**. These payments will be documented through consent protocols and bank transactions. 3) Livelihood Restoration, Improvement and Assistance: In addition to the cash compensation provided by KGM in accordance with the Expropriation Law, owners of trees may request the relocation and transplantation of their trees. In such cases, support will be provided by the EPC teams so that the trees are transplanted to a suitable location identified by the owner. If relocation is not requested, the tree debris will be left to the owner of trees, if requested. In addition, the land users – if her/his land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
(i)11	Loss of non-residential (secondary) structures on affected **private parcels** (fences, barns, sheds, wells, other infrastructure)	Owners of non-residential structures who are either **landowners or formal tenants/users** with official documentation	**99 parcels** within Motorway's expropriation corridor (see Section 3.1.6): - Section 1: 79 parcels - Section 2: 9 parcels - Section 3: 11 parcels	In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables, issued in February 2019. **Depreciation** is applied according to the depreciation ratios stipulated in the applicable Turkish legislation. In cases of **joint landownership**, compensation is paid to the **actualowner** of the structure **provided that he or she has obtained formal consent from the other co-owners confirming ownership rights.** If such consent is not available, cash compensation is distributed among all landowners in proportion to their registered shares. Incomplete construction ("*eksik imalat*"): The **unit construction costs** published by the Ministry of Environment, Urbanisation and Climate Change are calculated under the assumption that the buildings possess the standard characteristics they are supposed to have under normal conditions. However, if the expropriated building has features that fall short of these standards, the costs corresponding to the deficiencies is calculated and deducted from the total value of the structure. This situation is frequently encountered, especially with **older buildings. For example**, if a building subject to valuation lacks plaster as a construction component, the cost of the plaster must be calculated and subtracted from the total value of the building. Supreme Court rulings also emphasize that the **internal and external features** of the disputed structure (e.g., water, electricity, and sewer systems, wet and dry floor coverings, roof materials, etc.) must be examined in detail, and the **structure's value should be determined after deducting the cost of any missing components**[103] (Anonymous, 2015; Anonymous, 2016; Anonymous, 2018). Just as the cost of additional features such as a jacuzzi, sauna, built-in cupboards, wood paneling, parquet flooring, ceramic tiles, and central heating system, if present in an individual unit but not in others, should be added to the total cost, similarly, deducting the cost of missing elements is a reasonable practice and is not considered inconsistent with compliance with international standards.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. 2) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Top-up cash compensation will be provided by the SPV from the RAP Fund to the **actual owner(s)** of structures (based on evidence of structure ownership) in order to cover the amount deducted for depreciation from the mandatory cash compensation paid by KGM. **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days** following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owners/shareholders by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the **Purchase Agreement Protocol**. OR for cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made by the SPV within **45 calendar days** following the initial drawdown of the SPV. **Disagreement cases (Article 10 or Article 27 followed by Article 10):** **-Direct Article 10 court cases as per Law (no Article 27):** The payment will be made within **45 calendar days** following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **court decisions**, where the final expropriation value does not meet the full replacement cost of the affected asset. **-Article 27 court cases as per Law:** The payment will be made within **45 calendar days** following the determination of the land seizure value by the courts at the conclusion of the Article 27 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **Article 27 court decisions,** where the final expropriation value does not meet the full replacement cost of the affected asset. 3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the structure owners, the SPV will provide assistance in relocating them to replacement land or another suitable location identified by the PAP. 4) Other measures: The owner of the assets will be given the **right to salvage the recoverable materials** prior to demolition of non-movable assets.

[103] Anonymous, 2015. Supreme Court Decision. 5th Civil Chamber, No: 2014/23596, Decision: 2015/5990, Date: 25.03.2015; Anonymous, 2016. Supreme Court Decision. 5th Civil Chamber, No: 2016/12246, Decision: 2016/17970, Date: 22.12.2016; Anonymous, 2018. Supreme Court Decision. 5th Civil Chamber, No: 2018/6157, Decision: 2018/19026, Date: 25.10.2018.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
		Owners of non-residential structures **who are informal users of private lands** (with no title deed **but can prove their ownership of the structure)**		As per Article 19 of the Expropriation Law, for buildings or structures located on titled lands owned by others, on ownerless lands, or on lands not legally acquired by their possessors, the minimum material cost of the structure is paid to the possessor.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. 2) Top-up Cash Compensation to achieve Full Replacement Valueof the Structures on Affected Land: If there are **major**(*) structures (fixed improvements or investments) made or owned by the **informal** user (structure owner) on the affected land, KGM pays for **minimum material cost as per Article 19** of the Expropriation Law; top-up cash compensation to reflect market value (if needed, , where the final compensation value does not meet the full replacement cost) and achieve full replacement cost of the assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings). 3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 4) Other measures: The owner of the structures will be given the **right to salvage the recoverable materials** prior to demolition of non-movable assets.
		Owners of non-residential structures **who are informal users of private lands** **(with no official documentation** proving their ownership of the structure)	No specific cases have been identified in the expropriation plans or during RAP field surveys. The SPV will monitor and address any potential impacts that may arise during the implementation phase of the RAP.	**No compensation** is provided under the Expropriation Law.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. 2) Cash Compensation at Full Replacement Value: If the structure owner(s) (informal land users) cannot prove their ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund. 3) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 4) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
(i)12	Loss of non-residential (secondary) structures on affected **public parcels** (fences, barns, sheds, wells, other infrastructure)	Owners of non-residential structures who are **formal** tenants/ users of public lands with official documentation	**3 parcels** within Motorway's expropriation corridor: - Section 1: 2 • Sancaktepe (232/10) • Balaban (TH1) - Section 2: 1 • Kayı (Yol7)	In accordance with the Expropriation Law, cash compensation for non-residential structures and infrastructure is provided by KGM. The valuation of these assets is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019. Depreciation is applied according to the depreciation ratios stipulated in the applicable Turkish legislation.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. 2) Top-up Cash Compensation to achieve Full Replacement Value of the Structures on Affected Land: Top-up cash compensation will be provided by the SPV from the RAP Fund to the **actual owner(s)** of the structure, in order to cover the **depreciation** deducted from the mandatory cash compensation paid by KGM, where the final compensation value does not meet the full replacement cost. The depreciation amounts to be covered will be determined based on the values specified in the valuation reports of affected assets. 3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 4) Other measures: The owner of the assets will be given the **right to salvage the recoverable materials** prior to demolition of non-movable assets.
		Owners of non-residential structures who are **informal users of public lands – excluding those occupying forest and pasture 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.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV. 2) Top-up Cash Compensation to achieve Full Replacement Value on Affected Land: In case there are structures made/owned by the informal user (structure owner) on the affected land, KGM pays for **minimum material cost as per Article 19** of the Expropriation Law; top-up cash compensation to reflect market value (if needed - where the final expropriation value does not meet the full replacement cost) and achieve full replacement cost of the assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and provided to the owner (private person) by the SPV from the RAP Fund (only for structures/buildings), where the final compensation value does not meet the full replacement cost. If the assets owner (informal land users) cannot prove her/his ownership claim or the assets made/owned by the informal user (structure owner) on the affected land are not compensated by KGM, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund. 3) Moving Assistance and/or Allowance: If the affected structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 4) Other measures: The owner of the structures will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
		Owners of non-residential structures on **forestry and**		**No compensation** is provided under the Expropriation Law.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the relevant PAPs at least **3 months** in advance of land entry. Land entry will only proceed once expropriation has been finalised by the KGM (including the completion of expropriation payments) or mutual agreements/consent protocols with landowners and/or users have been concluded, and the relevant entitlements and support under this RAP has been provided by the SPV.

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		pasture lands or **structure owners** with no official documentation proving their ownership of the structure			2) Cash Compensation at Full Replacement Value: If the structures owned by informal users (structure owner) are on **forestry and pasture lands, which are not subject to compensation by KGM**, or if the assets owner (informal land users) cannot prove her/his ownership claim, the case will be reviewed and market value for these assets will be determined by a third-party valuation expert (on a case by case basis) to be commissioned by the SPV and cash compensation at full replacement cost will be provided to the owner(s) of the structures by the SPV from the RAP Fund. 3) Moving Assistance and/or Allowance: If the non-residential structures are movable, and upon request by the asset owners, the SPV will provide assistance in relocating them to replacement land or another location identified by the PAP. 4) Other measures: The owner of the assets will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
(i)13	**Special Use Assets**	Operator of the **dog shelter** – volunteer (tenant on affected land)	Kayı – Parcel No. 0/1615 and 0/1572	**No compensation** or assistance is provided to the operator under the Expropriation Law.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the operator of the dog shelter at least **six months** in **advance of the land entry.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation for land to the landowner and payment of the RAP compensation to the dog shelter operator, or once mutual agreements/consent protocols have been concluded with the landowner and the operator. 2) Top-up Cash Compensation to achieve Full Replacement Value for the Affected Assets: **Top-up cash compensation for the affected structures** will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof) in order to cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM, where the final compensation value does not meet the full replacement cost. For the agreement cases (as per Article 8) and Disagreement cases (Article 10 or Article 27 followed by Article 10), please see above i(11). If the tenant of the land (owner of the dog shelter) has built the non-residential structures and the compensation for the structure are legally paid by the SPV to the landowner not the tenant of the land/owner of the dog shelter, the SPV can withhold or offset any additional payment that have gone to the landowner (e.g. depreciation top-up) and redirect/reallocate an adequate portion of it to the tenant (dog shelter operator) to prevent unjust enrichment of landowners and avoid double-counting. 3) Relocation Support Package: The SPV will provide a cash compensation package to the dog shelter operator **prior to relocation**, to cover the following relocation-related costs. -Rental allowance: A **three-month** rent allowance, **based on the market rental rate** of the replacement land to be rented -Real estate agent service fee: Equivalent to the **market rental rate** of the replacement land to be rented -Discomfort Allowance for other relocation related expenses: 500 EUR per for utility subscription fees, tenancy registration, etc. -Allowance for unforeseen expenses (such as fixed investments made by the renter): assumed 10% of the relocation support package for RAP budgeting purposes. This amount will be provided if such expenses (e.g., fixed investments made by the operator) are confirmed by the SPV and agreed with the PAPs based on evidence or field identifications. During the early consultations and notification for land acquisition process, the SPV will provide written information to the PAP detailing the content, amount, and delivery timeline of the **House Relocation Support Package.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the tenant to sign a **Relocation Protocol** , confirming their agreement to relocate to a new land within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the PAP regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. The package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the Relocation Protocol between the **PAP** and the SPV. 4) Replacement Land Search Support and Support for Construction: The SPV will assist in finding a replacement land for the dog shelter with equivalent or better characteristics and a comparably advantageous location. **The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel, if available, on which the dog shelter can be reestablished with security of tenure.** 5) Moving Assistance and/or Allowance: For the pets and movable affected structures, upon request by the dog shelter operator, the SPV will provide assistance in relocating them to replacement land or another suitable location identified by the PAP. This will include transfer of pets to the identified relocation site using suitably equipped pet transport vehicles, in a manner that ensures animal welfare during transportation. The SPV will directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the dog shelter operator – whichever is appropriate – based on submitted evidence or documentation, at the time the expenses are incurred. 6) Soft support to relocation or other household-specific measures/assistance: Any specific needs of the dog shelter operator and employees during relocation will be identified through ongoing consultation by SPV and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams:

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					-Assistance with coordination and liaison with relevant local authorities, municipalities, or veterinary services, as needed, to facilitate the relocation process; -Assistance with the preparation of documentation, procedures, transactions and notification at relevant institutions (e.g. disconnection of existing utility services and reconnection of essential services such as electricity, water supply, natural gas, and waste collection at the replacement location; registration of the new address, if applicable); -Case-specific measures to support animal welfare during the relocation process, particularly where vulnerable or special-needs animals are involved 7) Other measures: The dog shelter operator will be given the right to salvage the recoverable materials prior to demolition of non-movable assets.
		Operator of the pet cemetery and families/guardians of the buried pets	Gundogdu neighbourhood Parcel No. 200/30	**No compensation** or assistance is provided to the operator or families/guardians of the buried pets under the Expropriation Law.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the operator of the pet cemetery and where possible the families/guardian of the buried pets at least **6 months** in **advance of the land entry.** 2) Management Procedure: The following procedure will be followed by the SPV prior to land entry: 1. The SPV CLOs consulted with the cemetery operator in May 2026 to clarify the operational structure of the pet cemetery, the status of existing burials, and the arrangements made with pet owners. If needed, additional consultations will be carried out with the landowner and the cemetery operator to provide further information on the expropriation boundaries and the construction schedule/ 2. As declared by the cemetery operator, the relocation process, including any consultation required to be held with the owners/guardians of the buried pets, will be managed by the cemetery operator. 3. It is assumed that the cemetery operator maintains the list of families/guardians of the pet owners whose animals are buried within the affected area, including available contact details, burial dates, and the status or duration of burial arrangements, necessary agreements, records, payment documents, or other relevant information relating to the buried pets and cemetery operations, and is authorised to manage the process with the owners/guardians of the buried pets without the involvement of the SPV. The SPV will request a formal confirmation from the cemetery operator regarding this authorisation and that the burial rights allow the cemetery operator to manage the process on behalf of the owners/guardians. 4. As needed, the Project will provide the vehicle and equipment required for the relocation of the graves by the cemetery operator outside the expropriation area. If incurred, the costs associated with transportation of the remains and the purchase or rental of a new burial plot, equivalent to the previous arrangements and payment made for the existing burial arrangement, will be covered by the SPV. 5. All consultations, records reviewed, decisions taken, authority correspondence, agreements, and implementation outcomes will be documented and retained as part of RAP implementation records.
(i)14	**Establishment of servitude (easement)** resulting in a reduction in the value of the immovable asset	Owners of parcels subject to acquisition through the constitution of servitude (easement rights)	Easement rights will apply to any privately owned parcels that are affected by the OHTL or other infrastructure displacement-related works. In such cases, expropriation will be carried out, and easement rights (servitude – *irtifak*) for the (i.e. underwire alignment for the OHTLs) alignments will be established by KGM in accordance with the Expropriation Law and the approved expropriation plans. No easement rights are anticipated to be established for other Project components or associated facilities.	In accordance with Article 4 of the Expropriation Law, instead of acquiring full ownership of immovable assets, easement rights may be established through expropriation on a specific section, height, depth, or source of the immovable, provided that such rights are sufficient to serve the intended purpose. In the Project, easement rights will apply to any privately owned parcels that are affected by the OHTL or other infrastructure displacement-related works. In such cases, expropriation will be carried out, and easement rights (servitude – *irtifak*) for the (i.e. underwire alignment for the OHTLs) alignments will be established by KGM in accordance with the Expropriation Law and the approved expropriation plans. Cash compensation for easement rights – reflecting the value of any potential restrictions on land use – is determined by KGM's asset valuers and paid to the owners/shareholders for the alignments (i.e. underwire alignment for the OHTLs). As stipulated by the Law, ownership rights remain with the landowner, subject to the implementation of necessary safety measures.	1) Monitoring, Grievance Management and Corrective Measures: Where applicable, the constitution of servitude for any Project-related displacement works (e.g. infrastructure) will be monitored by the SPV during both the construction and operation phases, in collaboration with KGM, and in accordance with the procedures outlined in the Expropriation Law. The SPV will also consult affected owners or users (if any) to identify potential grievances and/or risks (e.g. loss of property value). As required, any grievances related to compensation for loss of land value under the Expropriation Law, and during the construction and operation phases, will be assessed by the SPV, with support from third-party valuation experts as necessary. Based on these assessments, corrective measures (e.g. compensation for damages) will be planned and implemented by the SPV on a case-by-case basis. 2) Livelihood Restoration, Improvement and Assistance: The users of affected lands – if their land-land based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(i)15	**Impact on beekeepers operating on affected lands** **a) Direct Impact – Beehives Located on Acquired Parcels (Requiring Relocation)**	Formal or informal owners/operators of affected beehives.	See Section 5.2.3.3.8 ("Beekeeping Activities") for households engaged in beekeeping in the affected settlements – Beekeepersamong these households who may be affected by Project activities – if any – will be identified on a case-by-case basis during RAP implementation through field verification, stakeholder engagement and the Project Grievance Mechanism.	No specific compensation or assistance is provided under the Expropriation Law.	**1) Early Consultations and Notification:** Prior to land entry, the SPV will identify beehives located on or in the proximity of the parcels directly acquired by the Project through the field verification and consultations with landowners, land users, and mukhtars, as applicable. The SPV will notify the land users including the beekeepers using the affected lands at least **three months** in advance of land entry. Land entry will only proceed after the affected beekeeper has been informed and the necessary arrangements for relocation of the beehives have been agreed and implemented. **2) Relocation Assistance:** The SPV will consult with the affected beekeeper, if needed, to determine an appropriate relocation schedule and method, taking into account the health and safety of the bee colonies, seasonal and weather conditions, flowering and production periods, and safe transportation requirements. The SPV will provide moving assistance for the relocation of beehives, hive stands, and other movable apiary equipment to a suitable alternative site identified by the beekeeper, if requested or needed by the PAP. **3) Monitoring, Grievance Management and Corrective Measures:** The SPV will monitor the relocation of affected beehives. Complaints and claims will be collected, investigated, resolved and monitored through the Project Grievance Mechanism. Any claims regarding impact on beekeeping activities and associated livelihoods attributed to relocation will be investigated and assessed by the competent SPV personnel and/or where necessary by qualified third-party experts with relevant apiculture any valuation expertise to be engaged by the SPV upon receipt through the Project Grievance Mechanism or other channels. Where monitoring or investigation identifies residual impacts, the SPV will develop and implement corrective measures on a case-by-case basis. The respective liabilities of contractors and subcontractors will be clearly defined in their agreements. **4) Livelihood Restoration, Improvement and Assistance:** Beekeepers whose livelihoods are affected will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, tailored to compensate for the impact on beekeeping-based livelihoods.
	Impact on beekeepers operating on affected lands **b) Indirect Impact – Construction-Related Dust and Other Nuisance Impacts on Beehives Outside the Expropriation Corridor**				**1) Construction-Related Mitigation Measures:** Non-land-related construction impacts will be managed in accordance with **Item (v)3** of this Entitlements Matrix. The SPV will ensure that construction-related environmental measures are implemented in line with the Project ESIA, to avoid, minimise and/or rectify impacts on beehives located in proximity to construction works. Such measures may include: • implementation of dust suppression and vibration control measures in accordance with the Project ESIA; • adjustment of construction methods or schedules, where feasible; • provision of advance information to beekeepers regarding construction activities that may affect the beehives; and • temporary relocation of beehives where construction impacts cannot otherwise be adequately mitigated. **2) Monitoring, Grievance Management and Corrective Measures:** The SPV will monitor any construction-related impacts on nearby beekeeping activities. Complaints and claims will be collected, investigated, resolved and monitored through the Project Grievance Mechanism. Any claims regarding impact on beekeeping activities and associated livelihoods attributed to construction impacts (e.g. construction-related dust or nuisance) will be investigated and assessed by competent SPV personnel and/or where necessary by qualified third-party experts with relevant apiculture any valuation expertise to be engaged by the SPV. Where monitoring or investigation identifies residual impacts, the SPV will develop and implement corrective measures on a case-by-case basis. The respective liabilities of contractors and subcontractors will be clearly defined in their agreements. **3) Livelihood Restoration, Improvement and Assistance:** Beekeepers whose livelihoods are affected will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8, tailored to compensate for the impact on beekeeping-based livelihoods.
(ii)	**Affected Residential Structures (Houses)**				
(ii)1	Loss of **formal** residential houses on affected **private parcels**	Owner of affected house	**42 parcels – 43 households to be relocated** within Motorway's expropriation corridor (5 permanent + 38 seasonal households): - Section 1: 24 HHs • Çeltik (8) • Sancaktepe (6) • Balaban (8) • Değirmenköy (1) • Seymen (1)	In accordance with the Expropriation Law, cash compensation for residential structures on private parcels is provided by KGM. The valuation of these assets is conducted in line with *KGM's Technical Specifications for the Services to be Procured for the Valuation of Immovables*, issued in February 2019, valuers based on building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. **Depreciation** is applied according to the depreciation ratios stipulated in the applicable Turkish legislation. In cases of **joint landownership**, compensation is paid to the **owner** of the structure, provided that he or she has obtained formal consent from the other co-owners of the land confirming ownership rights. If such consent is not available, cash compensation is distributed among all landowners in proportion to their registered shares.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the affected houses (actual residents) at least **6 months** in **advance of the land entry.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the actual residents of the affected house. **OR** **If expropriation has already been concluded** (through Article 8, direct Article 10 or Article 27), the SPV will notify the owner of the Project schedule, and the owner will be granted a **6-months period** to vacate the property following the notification. In cases where this timeframe cannot be provided, alternative case-specific support mechanisms will be agreed with the affected households and implemented accordingly. 2) Top-up Cash Compensation to achieve Full Replacement Value for the Affected Residential Structure: Cash compensation for affected land is provided by the KGM in accordance with the Expropriation Law. The SPV will provide entitlements to landowners as specified under "**(i)1 – Permanent Loss of Private Parcels."**

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
			- Section 2: 19 HHs • Gazioğlu (4) • Köseilyas (4) • Gündoğdu (5) • Zafer (6) - Section 3: 0		**Top-up cash compensation for the residential house** will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof) in order to achieve full replacement value. This will cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM, where the final expropriation value does not meet the full replacement cost. Any applicable RAP support, including the depreciation compensation if applicable, will be paid to the actual resident who is subject to physical displacement impacts of the Project and requires replacement of the affected structure. Agreement cases (as per Article 8): The payment will be made within **45 calendar days** following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the **Purchase Agreement Protocol**. For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made by the SPV within **45 calendar days** following the initial drawdownof the SPV. Disagreement cases (Article 10 or Article 27 followed by Article 10): **-Direct Article 10 court cases as per Law (no Article 27):** The payment will be made within **45 calendar days** following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **court decisions,** where the final expropriation value does not meet the full replacement cost. **-Article 27 court cases as per Law:** The payment will be made within **45 calendar days** following the determination of the land seizure value by the courts at the conclusion of the Article 27 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **Article 27 court decisions, where the final expropriation value does not meet the full replacement cost**. **In cases of joint landownership,** the SPV will monitor whether the homeowner, who is the actual resident, has obtained formal consent from the other non-resident co-owners of the land confirming their ownership rights. If such consent is not in place, the SPV will plan and implement corrective actions, including helping the actual resident engage – and, if possible, reach an agreement with other shareholders – with support from KGM officials, to ensure that the homeowner (actual resident) receives compensation for the house at full replacement cost or provided with a similar replacement house. If the house owner (actual resident) cannot receive full compensation, top-up compensation will be provided by the SPV from the RAP Fund, in cases where this situation limits their ability to build or relocate to a replacement house. 3) House Relocation Support Package: The SPV will provide a cash compensation package to the homeowner (actual resident) **prior to relocation**, to cover the following potential relocation-related cost, if incurred within a reasonable timeframe after expropriation. -Title deed transfer costs: 2% of the cost of the replacement house of equivalent characteristics (comparable to the value identified in the Article 8 Purchase Agreement Protocol or in the Article 10 or 27 Court Decisions – **without depreciation**) -Real estate agent service fee: 2% of the cost of the replacement house of equivalent characteristics (comparable to the value identified in the Article 8 Purchase Agreement Protocol or in the Article 10 or 27 Court Decisions – **without depreciation**) -Working capital fund (“*doner sermaye*”) for title deed transactions for new replacement house purchases (specific to each district), -Discomfort Allowance for other relocation related expenses of households with affected permanent residences: 500 EUR per household for utility subscription fees, changing identification documents, new enrolment processes, etc. During the early consultations and notification for land acquisition process, the SPV will provide written information to the owner detailing the content, amount, and delivery timeline of the **House Relocation Support Package,** through a draft Relocation Protocol**.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the homeowner (actual resident) to sign the **Relocation Protocol**, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM’s expropriation programme and the SPV’s up-to-date construction schedule – on condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the homeowner regarding the package will be reviewed and resolved in accordance with Project’s grievance mechanism. If deemed necessary by the SPV, the Relocation Protocol may be notarised. The applicable components of the package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the Relocation Protocol between the **homeowner** and the SPV. For any RAP support components that are not applicable at the time of signing of the Relocation Protocol, PAPs will have the right to apply for and request any outstanding RAP assistance within **6 months** following receipt of expropriation compensation from KGM and notification by the SPV regarding the available RAP support measures. Assessment of applications submitted after the 6-month period will be at the sole discretion of the SPV. 4) Replacement House Search Support and Support for Replacement Housing Construction: In addition to the House Relocation Support Package, the SPV will assist in finding a replacement residential house of equal or greater value, with equivalent or better characteristics and a comparably advantageous location **or** identifying suitable replacement land for the construction of a new house at acceptable standards with security of tenure. **The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as private, treasury, non-registered), if available, on which the house can be built with security of tenure.** Additionally, the SPV and EPC construction teams will assign civil engineers and technicians to advise and supervise affected individuals – as needed – who prefer to construct their own houses. These technical personnel will provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					Where necessary and appropriate, construction machinery and equipment will be temporarily provided to assist affected households during the construction of their replacement homes. 5) Moving and travelling allowance: The SPV will directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the owners – whichever is appropriate – based on submitted evidence or documentation, at the time the expenses are incurred. 6) Right to salvage materials: The homeowner will be granted the right to salvage recoverable building materials prior to demolition. 7) Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation – particularly for households with vulnerable members – will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams: -Assistance with registering children at new schools, if needed -Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) -Case-specific measures to ensure the comfort of vulnerable household members during relocation 8) Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected homeowners) on which the impacted house is located – if their land-based livelihoods are affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
		Formal user (formal tenant)	**2 parcels** within Motorway's expropriation corridor: Section 1: 1 • Çeltik (1) Section 2: 1 • Zafer (1) **5 PAPs** within Motorway's expropriation corridor: - Section 1: 1 • Çeltik (1) - Section 2: 4 • Zafer (4), with no rental payment - Section 3: 0	In accordance with the law, **no compensation** is provided to formal tenants. However, the owner and tenant may reach a separate agreement based on the terms and conditions of the tenancy contract.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the tenant of the affected houses at least **6 months** in **advance of the land entry.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation to the owner, or once mutual agreements/consent protocols have been concluded with the actual residents of the affected house. 2) House Relocation Support Package: The SPV will provide a cash compensation package to the tenants of houses **prior to relocation**, to cover the following relocation-related costs. -Rental allowance: A **three-month** rent allowance, **based on the market rental rate** of the replacement house to be rented -Real estate agent service fee: Equivalent to the **market rental rate** of the replacement house to be rented -Discomfort Allowance for other relocation related expenses of households with affected permanent residences: 500 EUR per household for utility subscription fees, tenancy registration, etc. -Allowance for unforeseen expenses (such as fixed investments made by the renter): assumed 10% of the house relocation support package for RAP budgeting purposes. This amount will be provided if such expenses (e.g., fixed investments made by the renter) are confirmed by the SPV and agreed with the PAPs based on evidence or field identifications. During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package,** through a draft Relocation Protocol**.** **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the tenant to sign the **Relocation Protocol** , confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on the condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the tenant regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. If deemed necessary by the SPV, the Relocation Protocol may be notarised. The applicable components of the package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the Relocation Protocol between the **tenant** and the SPV. For any RAP support components that are not applicable at the time of signing of the Relocation Protocol, PAPs will have the right to apply for and request any outstanding RAP assistance within **6 months** following receipt of expropriation compensation from KGM and notification by the SPV regarding the available RAP support measures. Assessment of applications submitted after the 6-month period will be at the sole discretion of the SPV. 3) Replacement House Search Support: In addition to the relocation support package, if requested by the PAP, the SPV will provide assistance for finding replacement residential house of equal or higher value (with equivalent or better characteristics and advantageous location). 4) Moving and travelling allowance: The SPV will directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the tenants based on submitted evidence or documentation, at the time the expenses are incurred. 5) Right to salvage materials: The tenant will be granted the right to salvage recoverable building materials – if such materials belong to the tenant – prior to demolition, in accordance with any applicable provisions of the rental agreement between the tenant and the owner. 6) Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation – particularly for households with vulnerable members – will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams:

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					-Assistance with registering children at new schools, if needed -Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) -Case-specific measures to ensure the comfort of vulnerable household members during relocation 7) Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected tenants) on which the impacted house is located – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
		Informal users	No specific cases have been identified in the expropriation plans or during RAP field surveys. The SPV will monitor and address any potential impacts that may arise during the implementation phase of the RAP.	In accordance with the law, **no compensation** is provided to informal tenants.	The same entitlements specified for **formal users** (above) will apply, where applicable.
(ii)2	Loss of **informal** residential houses on affected **public parcels**	Owner and user of **informal house on public lands**	**None** according to current expropriation plans. The SPV will monitor and address any potential impacts that may arise during the implementation phase of the RAP.	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. No compensation is provided for land. In accordance with the law, **no compensation** for house or land is provided to owners of informal houses on **forest or pasture land**.	**There are currently no houses located on public land** that are affected by the Project. Should such impacts arise during Project implementation, the following entitlements and support measures will apply: 1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the owner of the affected houses (actual resident) at least **6 months** in **advance of the land entry.** 2) Cash Compensation at Full Replacement Value for Residential Building: - If KGM pays for **minimum material cost as per Article 19** of the Expropriation Law (for registered fixtures/structures – *muhdesat*), top-up cash compensation to reflect market value and achieve full replacement cost of the assets will be determined by a third-party valuation expert to be commissioned by the SPV and provided to the homeowner (actual resident of the affected house) by the SPV from the RAP Fund (only for structures/buildings). - If KGM does **not** provide any compensation (e.g. for structures on **forest or pasture**), cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the **homeowner** (based on proof). The payment will be made together with the House Relocation Support Package (**next item**). 3) House Relocation Support Package: The SPV will provide a cash compensation package to the owners of informal houses **prior to relocation**, to cover the following relocation-related costs. -Discomfort Allowance for other relocation related expenses of households with affected permanent residences: 500 EUR per household for utility subscription fees, tenancy registration, changing identification documents, new enrolment processes, etc. -Allowance for unforeseen expenses (such as fixed investments made by the informal house owner): assumed 10% of the house relocation support package for RAP budgeting purposes. This amount will be provided if such expenses (e.g., fixed investments made by the renter) are confirmed by the SPV and agreed with the PAPs based on evidence or field identifications. During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package,** through a draft Relocation Protocol. **For the delivery of cash compensation,** following the early consultations and notification for land acquisition process, the SPV will require the informal homeowner to sign the **Relocation Protocol**, confirming their agreement to relocate to a new house within a timeframe to be agreed with the SPV – aligned with KGM's expropriation programme and the SPV's up-to-date construction schedule – on condition that the House Relocation Support Package is delivered by the SPV within the committed timeframes. Any requests or objections raised by the informal homeowner regarding the package will be reviewed and resolved in accordance with Project's grievance mechanism. If deemed necessary by the SPV, the Relocation Protocol may be notarised. The applicable components of the package will be delivered as a **one-off cash compensation** within **15 days** following the execution of the Relocation Protocol between the owner and the SPV. For any RAP support components that are not applicable at the time of signing of the Relocation Protocol, PAPs will have the right to apply for and request any outstanding RAP assistance within **6 months** following receipt of expropriation compensation from KGM and notification by the SPV regarding the available RAP support measures. Assessment of applications submitted after the 6-month period will be at the sole discretion of the SPV. 4) Replacement Land Search Support and Support for Replacement Housing Construction: The SPV will assist in finding a replacement residential house or identifying suitable replacement land for the construction of a new house at acceptable standards with security of tenure. **The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the house can be built with security of tenure.** Additionally, the SPV and EPC construction teams will assign civil engineers and technicians **to advise and supervise affected individuals** who prefer to construct their own houses. These technical personnel will provide **guidance** particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding. Where necessary and appropriate, construction labour, machinery and equipment will be temporarily provided to assist affected households during the construction of their replacement homes.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					5) Moving and travelling allowance: The SPV will either arrange the full relocation, directly pay the invoices of the vendors or reimburse the moving and travel costs incurred by the owners, based on submitted evidence or documentation, at the time the expenses are incurred. 6) Right to salvage materials: The informal homeowner will be granted the right to salvage recoverable building materials prior to demolition. 7) Soft support to relocation or other household-specific measures/assistance: Any specific needs of households during relocation will be identified and addressed during RAP implementation. Upon request by the PAPs, support and assistance will be provided by the SPV site teams: -Assistance with registering children at new schools, if needed -Assistance with the preparation of documentation, procedures, and transactions at relevant institutions (e.g. title deed offices; disconnection of previous utility services; reconnection of utilities such as water, gas, electricity, and internet at the replacement house; registration of the new address, etc.) -Case-specific measures to ensure the comfort of vulnerable household members during relocation 8) Livelihood Restoration, Improvement and Assistance: The users of affected lands (affected informal homeowners) on which the impacted house is located – if their livelihood is affected – will be entitled to access livelihood restoration, improvement, and/or assistance measures as defined in Chapter 8.
(iii)	**Affected Businesses**				
Business owners					
(iii)1	Businesses on on affected **private parcels** that will be relocated (may include businesses which will be (i) resettled permanently, (ii) shut-down business operations, (iii) continue operations at the same place with partial loss of land and/or assets)	May include the following: Formal or informal business owners who are the "**owner**" of the affected business structure Formal or informal business owners who are the "**tenants**" at the affected business structure Not a business owner at the affected business structure but the owner of the affected building	**1 parcel** within Motorway's expropriation corridor: - Section 2: 1 parcel • Kayı (BUS-0/1570)	As per the Expropriation Law, cash compensation is provided to **structure owners** by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. Depreciation is deducted in accordance with the depreciation ratios set out in the relevant Turkish legislation. In cases where tenant business owners operate at the affected business structure, and both the owner and the tenants provide their consent, KGM would directly compensate the tenants for the movable and non-movable assets determined to be in their ownership. If there is no agreement between the owner and the tenants regarding the ownership of the assets included in the valuation, KGM would provide compensation to the identified asset owner. Any disputes between the parties may subsequently be pursued under the relevant national legislation, should they choose to do so.	1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner (structure owner or tenant) at least **6 months** in **advance of the land entry.** Land entry will only occur after the expropriation process has been finalised, including the payment of compensation, or once mutual agreements/consent protocols have been concluded with the owner of the business structures/business owners. The SPV will closely collaborate with KGM in the planning and execution of the building's evacuation, ensuring full alignment with Lenders' requirements to prevent forced eviction. 2) Top-up Cash Compensation to achieve Full Replacement Value for the Affected Business Structure: **Top-up cash compensation for the affected business structure** will be provided by the SPV from the RAP Fund to the **structure owner(s)** (based on proof) in order to achieve full replacement value. This will cover the amount deducted for **depreciation** from the mandatory cash compensation paid by KGM, where the final expropriation value does not meet the full replacement cost. Cash compensation for **affected land on which the business structure is located** is provided by the KGM – separate from structure value – in accordance with the Expropriation Law. The SPV will provide entitlements to landowners as specified under "**(i)1 – Permanent Los of Private Parcels."** **Agreement cases (as per Article 8):** The payment will be made within **45 calendar days**[104] following the transfer of title deeds to KGM and the disbursement of the agreed expropriation cost (mandatory cash compensation) to the owner by KGM. The depreciation amounts to be covered will be determined based on the final expropriation value agreed during the negotiations and indicated on the **Purchase Agreement Protocol,** where the final expropriation value does not meet the full replacement cost. For cases where expropriation, including the transfer of title deeds to KGM, has already been concluded, the payment period will begin from the date of the Financial Close. PAPs with eligible compensation will be informed individually after signing and the payment will be made within **45 calendar days** following the initial drawdown of the SPV. **Disagreement cases (Article 10 or Article 27 followed by Article 10):** **-Direct Article 10 court cases as per Law (no Article 27):** The payment will be made within **45 calendar days** following the determination of the expropriation value by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **court decisions,** where the final expropriation value does not meet the full replacement cost. **-Article 27 court cases as per Law**: The payment will be made within **45 calendar days** following the determination of the final expropriation cost by the courts at the conclusion of the Article 10 process. The depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **Article 27 court decisions,** where the final expropriation value does not meet the full replacement cost. 3) Business Relocation Support Packages: The SPV will provide a **Business Relocation Support Packages** to business owners. The content of the packages will be determined as part of the RAP, separately for structure owners and tenants, taking into account the formality or informality of their operations, but will consist of the following items, as necessary:

[104] This is same with the duration (following the date of agreement) specified in Expropriation Law for the payment of expropriation fee agreed as per Art. 8 between KGM and owner/shareholder.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					• **Cash Compensation to cover cost of fixed (non-movable) investments/improvements at Full Replacement Cost** done by the business owner at the existing business structure will be paid by the SPV to business owner. This will cover fixed investments/improvements done for the interiors and exteriors of the building. • **Moving allowance to cover disassembly, transportation and assembly costs** for relocation of movable assets (e.g. machinery, equipment, stock of materials/products, etc.) to the new workplace. • **Business relocation support package to cover other relocation-related expenses** such as real estate agent service fee, title deed transfer costs (for **owners**), rental allowance (for **tenants**) 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 net income support,** as needed: This will include m**onthly net income loss support** to cover economic losses during temporary business interruption period **up to 6 months** until successful reestablishment of the affected business. The SPV in consultation and agreement with the business owner, will review the affected business to determine the amount of net income loss support for each business owner, with support from financial and accounting teams of the SPV based on official financial and accounting records (e.g. official tax declarations, accounting balance sheets of the last 3 years, etc.). The SPV will monitor the relocation process and confirm successful re-establishment of business at the new premises to cease monthly support. If the support duration is required to be extended due to significant impacts, this will be evaluated and actions will be planned accordingly in line with Lenders' requirements. If the employees resign due to business relocation in line with the Labour Law, compensation for severance payments will be provided to the business owners for being paid to employee to fulfil their liabilities under the Labour Law (In this case, no financial support will be provided to the employees as foreseen under "Business employees- temporary loss of income due to business interruption during relocation"). Tailored packages for businesses that shut-down due to Project's land acquisition (if any) including opportunities for Project employment will be determined on a case-by-case basis, if any. During the early consultations and notification for land acquisition process, the SPV will provide written information to the business owner detailing the content, amount, and delivery timeline of the **Business Relocation Support Package,** through a draft of the Relocation Protocol. **For the delivery of cash compensation**, following the early consultations and notification for land acquisition process, the SPV will require the business owner to mutually sign a **Relocation Protocol** undertaking to relocate to new workplace as per the timeframe to be agreed with the SPV (in alignment with the expropriation programme of KGM and up-to-date construction programme of SPV) on condition that the Business Relocation Support Package is delivered by the SPV within the agreed timeframes. If deemed necessary by the SPV, the Relocation Protocol may be notarised. For **both Agreement (as per Article 8)** and **Court cases as per Law**, the package will be delivered either at **once (one-off cash compensation) or based on milestones**. This will be decided by the SPV in consultation with the affected business owners. The SPV will coordinate the process in alignment with the corporate procedures of SPV regarding management of administrative affairs and procurement processes. For example, the SPV may prefer to directly pay the invoice of the moving/logistics firm or provide the moving allowance to business owner (method to be decided by the SPV during implementation based on corporate administrative and procurement policies). 4) Right to salvage materials: The business owner will be granted the right to salvage recoverable building materials – if such materials belong to the business owner – prior to demolition.
(iii)2	Businesses on affected **public parcels** that will be relocated	Owner or user of informal business structure Not a business owner at the affected business structure but the owner of the affected building	**None** No business structure on **treasury, forest, pasture non-registered** parcels will be relocated.	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. No compensation is provided for land. In accordance with the law, **no compensation** for the business structure or land is provided to owners of informal business structures on forest or pasture lands.	**There are currently no houses located on public land** that are affected by the Project. Should such impacts arise during Project implementation, the following entitlements and support measures will apply: 1) Early Consultations and Notification for Land Acquisition Process: The SPV will notify the business owner at least **six months** in **advance of the land entry.** 2) Cash Compensation at Full Replacement Value for for the Affected Business Structure: Cash compensation at full replacement value will be provided by the SPV from the RAP Fund to the **structure owner** (based on proof). The payment will be made together with the house relocation package (**next item**). In cases where KGM is unable to expropriate affected elements or structures, the SPV will ensure that the replacement cost equivalent payment is covered through the RAP Fund. This may include situations where businesses extend onto land not legally owned by them (e.g., roadside areas), and such structures are therefore not eligible for compensation by KGM. In these cases, the SPV will provide compensation to ensure full replacement cost for the affected users. 3) Business Relocation Support Packages: The SPV will provide a cash compensation package to the owners of informal business structures **prior to relocation**. **The content and delivery method will be same with the package offered to owners of formal business structures.** During the early consultations and notification for land acquisition process, the SPV will provide written information to the tenant detailing the content, amount, and delivery timeline of the **House Relocation Support Package,** through a draft of the Relocation Protocol. 4) Replacement Land Search Support: The SPV will assist in finding a replacement business structure or identifying suitable replacement land for the construction of a new business structure at acceptable standards with security of tenure.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					The SPV will facilitate and support coordination with relevant authorities, institutions and mukhtars, as needed, to help identify a suitable parcel (such as treasury, non-registered or other) on which the business structure can be built with security of tenure. 5) Right to salvage materials: The business owner will be granted the right to salvage recoverable building materials – if such materials belong to the business owner – prior to demolition.
(iii)3	**Businesses that will not relocate** but may experience partial loss of land and/or assets	**Owner** or **tenant** of the affected business structure	**5 parcels** within Motorway's expropriation corridor: - Section 1: 4 • Gümüşyaka: -BUS-7878/5 -BUS-7878/1 -BUS-7860/17 (7860/17 and TH-1) - Section 2: 1 • Kayı: -BUS-0/1545	In accordance with the Expropriation Law, cash compensation is provided by KGM based on valuations conducted by KGM asset valuers, using building unit prices published by the Ministry of Environment, Urbanisation and Climate Change. Structures owned by tenants are compensated in accordance with the conditions set forth in the Expropriation Law.	1) Top-up Cash Compensation to Cover Depreciation Cost of the Affected Buildings/Structures to ensure compensation at Full Replacement Cost. For **Article 8** agreement cases, the depreciation amounts to be covered will be determined based on the final expropriation values agreed during the negotiations and indicated on the **Purchase Agreement Protocol**, where the final expropriation value does not meet the full replacement cost. **For direct Article 10 court cases** as per Law (no Article 27), the depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **court decisions**, where the final expropriation value does not meet the full replacement cost. For **Article 27 court cases** as per Law, the depreciation amounts to be covered will be based on the values to be determined by the courts and indicated on the **Article 27 court decisions**, where the final expropriation value does not meet the full replacement cost. In cases where KGM is unable to expropriate affected elements or structures, the SPV will ensure that the replacement cost equivalent payment is covered through the RAP Fund. This may include situations where businesses extend onto land not legally owned by them (e.g., roadside areas), and such structures are therefore not eligible for compensation by KGM. In these cases, the SPV will provide compensation to ensure full replacement cost for the affected users. 2) Support by Construction Teams and Grievance Mechanism: Where appropriate, support will be provided by the SPV/EPC Contractor's construction team and vehicles to ensure continuity of business operations and to avoid disruption caused by construction activities (e.g. measures to ensure avoidance of potential access restrictions to the site – such as at entry/exit gates, ramps, or for the reorganisation of the layout of movable structures). The SPV/EPC Contractor will provide assistance for relocating affected movable structures and auxiliary facilities to another location within the existing premises or nearby surroundings. The moving process for these assets will be coordinated in consultation with the business owner to minimise any interruption to business operations. 3) Monitoring, Grievance Management and Corrective Actions: The SPV will collect, manage, and monitor requests and grievances in accordance with the Project's Grievance Mechanism. Any impacts on business operations – such as access restrictions caused by construction or during the operational phase – will be identified on a case-by-case basis, and corrective actions will be developed and implemented in consultation with the business owners.
Employees					
(iii)4	**Temporary** income loss by the employees of the affected businesses that will relocate	**Formal** and **informal** employees of affected businesses (incl. employees with vulnerabilities such as disabled and migrant)	Section 2: 1 business to be relocated – Kayı BUS-0/1570 **9 full-time employees at the business that will relocate** (no vulnerable, no women employees)	Under the Turkish Expropriation Law, no compensation is required for loss of income of either formal or informal employees of the affected businesses.	Financial Support Package to Employees: The SPV will provide financial support (gross salary) package to employees amounting up to **3 months of gross salary** per employee through the following process: 1)Census of Current Formal and Informal Employees: The SPV will identify all formal and informal employees working at the affected businesses as of the date of Early Consultations (three months prior to the start of expropriation). Employment conditions (e.g. full-time status, gross and net salaries, etc.) will be determined by the SPV as follows: - Formal employees: Based on official documentation, insurance registers, accounting records, etc. - Informal employees: Based on consultations with the affected informal employee, business owners and/or other employees and/or other relevant trustee parties (to be done at different times to verify declarations) It is assumed that finalisation of expropriation and evacuation of building (relocation) will take place within approximately 6 months after Early Consultations and successful reestablishment of the business at the new premises can be achieved within 6 months after relocation ("**Post Relocation and Business Reestablishment Period**"). The business owners will be required to report any employee (formal or informal) hired after the date of Early Consultations and Notification until the end of Post Relocation and Business Reestablishment Period. As required, eligibility of such employees for RAP entitlements will be reviewed and evaluated by the SPV. 2) Monitoring of Employment Status of Employees and Determination of Gross Salary Support Requirement: The SPV will monitor and report the employment status of formal and informal employees for approximately 12 months after Early Consultations step. During this 12-months period after Early Consultations: **a)**If the RAP monitoring identifies that there are employees affected by temporary business interruption related to relocation (cause of the impact to be assessed and identified by the SPV, the gross salary of each affected employee up to 3 months will be compensated by the SPV from RAP Fund to prevent loss of income by the employee during this period. If the duration of the gross salary support is required to be extended due to significant impacts (significance of the impact to be monitored and verified by the SPV), this will be evaluated in consultation with Lenders and actions will be planned and implemented by the SPV accordingly. **b)**If the RAP monitoring proves that there is no adverse impact/interruption on the income of the employees, the SPV will not provide any gross salary support for the employees.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
					3) Payment Mechanism: As per the payment mechanism framed by the legal and financial teams of the SPV: **a)**For formal employees, employment status/conditions and amount of payment will be redetermined/verified by the SPV, according to last 6 payrolls of the employee (also Social Security Institution – SGK register for last 6 months will be requested from the business owner). During/in case of business interruption, the SPV will make gross salary payments to employees through their business owners (as the employee will remain registered under business owner's workplace during the business interruption period) on a monthly basis based on a protocol to be executed between the SPV/EPC, Employee and Business Owner (Employer). The protocol will include clauses guaranteeing the following mechanism: - Business owner will execute salary payment transaction order at the bank for the relevant month. - Business owner will not interrupt insurance registration and payments of the employee. - Business owner will submit the evidence of transaction order and insurance payment documents to SPV. - SPV will make the gross salary payments to the Business owner on same day the evidence of employee salary payment transactions are submitted by the Business owner to the SPV. - All transactions between SPV, business owners and employees will be appropriately documented by the SPV. - SPV will monitor the process through consultation with the business owners and employees. **b)**For informal employees, employment status/conditions and amount of payment will be redetermined/verified by the SPV based on consultations with the affected informal employee, business owners and/or other employees and/or other relevant trustee parties (to be done at different times to verify declarations) and based on review of any relevant documentation/evidence. The SPV will make gross salary payments directly to affected informal employees on a monthly basis. The transaction mechanism will be decided by the SPV in agreement with the employee through a mechanism guaranteeing that the salary compensation is received by the affected informal employee. All transactions to be done by the SPV for the benefit of informal employees will be appropriately documented by the SPV.
(iii)5	**Permanent** income loss by the employees of the affected businesses that will relocate – due to i)permanent business shut-down; ii)dismissal/ termination of employment contract by business owners (iii) resignation by employees as the business relocates to a remote location.	Formal and informal employees including vulnerable workers and women	No businesses have expressed an intention to cease operations as a result of Project-related land acquisition and relocation.	Under the Turkish Expropriation Law, no compensation is required for loss of income of either formal or informal employees of the affected businesses.	The entitlements outlined in this RAP are designed to support the continuation of business activities under conditions that are at least equivalent to, or preferably better than, those prior to relocation. The SPV will monitor the operations of the affected businesses throughout the RAP implementation period to ensure this objective is met. If the RAP monitoring identifies that there are employees who are dismissed/lose their jobs **within 6 months after relocation ("Post-relocation and Business Reestablishment Period")** due to reasons (e.g. business shut down) that are not under their control and directly related/inevitable because of business relocation (such reasons are subject to review and verification by the SPV) or resign themselves due to business relocation (including vulnerable employees or women who resign due to fundamentally increased distance to the new business location) in line with the Labour Law, they will be entitled to the following: a)For formal employees, compensation for severance payments unpaid annual leaves and other gained benefits will be the liability of their official business owners in line with the Labour Law. In addition, the SPV will review the case to verify that the dismissal of the employee or resignation is directly related/inevitable due to relocation of the business as a result of the Project and in such cases, SPV will provide 3 months of gross salary support to the affected employee within 15 days following verification. The SPV support to employees will be provided as **one-off** cash compensation directly to the bank account of the affected employees. All transactions to be done by the SPV will be appropriately documented. b)For informal employees, the SPV will review the case to verify that the dismissal of employee or, etc. by the employee is directly related/inevitable due to relocation of the business as a result of the Project and in such cases, the SPV will provide 3 months of gross salary support and the employee will further be entitled to the following: - Affected employee will be given priority for employment in the Project construction should they meet Project's employment criteria (e.g. education, skills, H&S considerations, etc.). - As necessary, other employee-specific measures will be developed by the SPV (e.g. specific skill trainings to increase opportunity for employment in similar or other sectors) and implemented on a case-by-case basis depending on the conditions of affected employee(s). The SPV support will be provided as one-off cash compensation through a mechanism guaranteeing that the salary compensation is received by the affected informal employee. All transactions to be done by the SPV for the benefit of informal employees will be appropriately documented.
(iii)6	Businesses that may be experience temporary income loss due to construction (e.g. dust, temporary traffic	Formal or informal business owners that may experience such impacts	To be determined on a case-by-case basis	Under the Turkish Expropriation Law, no specific compensation or assistance is required.	1) Construction-related Measures: The SPV will ensure, in coordination with the relevant authorities, that construction-related measures are implemented to avoid, minimise and/or remedy potential impacts or losses. Such measures may include on-site actions to minimise access restrictions; the installation or enhancement of warning signage; measures to improve the visibility of businesses, where feasible; the provision of alternative access routes for vehicles and pedestrians; and dust suppression measures in accordance with the Project ESIA. 2) Monitoring, Grievance Management and Corrective Measures: The SPV will ensure that any claims concerning impacts on business operations or loss of income are investigated and assessed by the SPV and, where necessary, by third-party experts engaged by the SPV. For all validated claims, the need for compensation or assistance will be assessed, and the appropriate form and level of such compensation or assistance will be determined on a case-by-case basis by qualified professionals with relevant

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
	restrictions or diversions, etc.)				subject-matter expertise. Where income loss is verified, the Project will provide compensation in accordance with the requirements of this RAP. The respective liabilities of contractors and subcontractors will be clearly defined in their agreements. The SPV will ensure that E&S impacts are monitored as outlined in the Project ESIA and will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to temporary impacts and losses during the construction phase.
(iv) Vulnerable People					
(iv)1	Affected households with vulnerable members – may be exposed to any of the losses or impacts identified for the above PAP categories, but at a more significant level due to vulnerability or disadvantaged conditions.	All households that are physically and economically displaced and include vulnerable members Please see Table 12-3 for Vulnerability Matrix for **Physically Displaced Households** – 4 individuals in 12 households: 2 female + 2 male Please see Appendix J for Vulnerability Matrix for **Economically Displaced Households** – 138 individuals in 274 households: 67 female + 71 male		Under the Turkish Expropriation Law, no specific compensation or assistance is required for vulnerable people.	1) Where possible in-kind support will be provided by the SPV to the vulnerable households from the **Vulnerable Groups Fund** to be provided under the RAP Fund. Vulnerability level of each household will be determined by the SPV based on the vulnerability scoring approach to be defined in the RAP. Households to be provided with support and the level of support (according to vulnerability scoring assessment) will be further determined (depending on their vulnerability levels) by the SPV, with support from third-party implementation partners and consultants, during RAP implementation. 2) Support and/or assistance tailored to the needs of households with vulnerable members (on a case-by-case basis): The SPV, through the expropriation team, CLOs and other in-house personnel as appropriate, will provide support to vulnerable households tailored to their needs (different needs of illiterate, elderly, single women, disabled, low-income individuals among others). This will include individualised communication and information provision, communication and information, logistical support, support for reviewing and processing official documents relevant to expropriation, completion of official procedures at the title deed offices or relevant to inheritance and succession, registration, enrolment at new resettlement sites, etc. 3) Livelihood Restoration, Improvement and Assistance: Physically and economically displaced households with vulnerable members will be entitled and given priority to accessing all livelihood restoration, improvement and assistance measures specified in this RAP. As one of the measures under LRP, at least one member of the physically or economically displaced households having vulnerabilities, who is looking for a job and meets Project's employment criteria (e.g. education, skills, H&S considerations, etc.) will be given priority in Project employment during construction phase.
(iv)2	Businesses that will relocate				1) Special support and/or assistance to vulnerable employees **(on a case-by-case basis):** Special measures/assistance to be provided to vulnerable employees and employees who have vulnerable members in their households will be identified by the SPV and assistance/measures will be developed and delivered by the SPV on a case-by-case basis.
(v) Temporary Losses/Impacts During Construction					
(v)1	Temporary loss of **private** parcels during construction (including access restrictions)	Owners/ shareholders	Please see Section 2.3.7 for temporary facilities.	Temporary facility sites that will continue to serve the Project during the operation phase are expropriated by KGM in accordance with the Expropriation Law. For facilities to be used solely during the construction phase, KGM requires the SPV/EPC to complete land acquisition through rental agreements, mutual protocols, or similar arrangements with the owners or shareholders.	1) Cash Compensation at Full Replacement Value: Protocols and/or rental agreements will be executed by the SPV/EPC with the owners/right holders of the lands to be used temporarily during the construction phase. Cash compensation for the use of land and any economic activity (cost of crops, trees, non-residential structures, infrastructure etc. at market prices) will be provided by the SPV to owners/right holders accordingly. 2) Moving Assistance and/or Allowance: In case the non-residential structures are movable and if requested by the owners, the SPV will provide assistance for moving them to replacement land or another location to be decided by the PAP. 3) Construction-related Measures: The SPV will ensure that all construction and work sites temporarily used during the construction phase are rehabilitated upon completion of activities at each site, in accordance with the Project ESIA. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner. 4) Monitoring, Grievance Management and Corrective Measures: The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to temporary land loss and access restrictions arising from construction phase impacts.
		Formal (tenants) and informal users	Formal users of temporary facility sites will be identified based on ongoing consultations with Mukhtars and communities as the final list of temporary facilities (incl. contractor and subcontractor) to be used will be decided by the SPV in agreement with KGM.	No compensation for **land** is provided to formal users for temporary land use by the Project. However, formal tenants are eligible for compensation for crops, trees and any assets and fixed improvements/ investments (structures) on the rented land on the condition that they can prove ownership for these crops/assets and fixed improvements/ investments. Depreciation is deducted in line with the depreciation ratios published in the relevant Turkish legislation.	PAPs are eligible for all entitlements defined for the formal users (formal tenants) **under** "Permanent loss of private parcels" **(please see above)**. The user will be entitled to access livelihood restoration, improvement and/or assistance measures as defined in Chapter 8. During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the respective landowner.

Ref.	Type of Loss/ Impact	Category of PAP	Number of Affected Parcels and PAPs	Compensation as per National Legislation – provided by KGM	Entitlements as per IFC PS5 – associated costs covered by the SPV from the RAP Fund (Chapter 16), in addition to the compensation under national legislation
(v)2	Temporary loss of **state-owned** parcels during construction (including access restrictions)	Owners (Governmental institutions)	Please see Section 2.3.7 for temporary facilities.	Treasury lands and non-registered parcels are allocated to the Project upon KGM's application, without any payment. Cash compensation is provided by KGM to legal entities in accordance with established protocols, and the respective parcels are subsequently transferred to KGM.	-
		Formal users (formal tenants)		Land designated for temporary use is allocated without undergoing expropriation procedures.	PAPs are eligible for all entitlements defined for the formal and informal users**under "(i)6 – Permanent loss of state-owned parcels"** During construction, the SPV will engage with local communities to ensure that safe crossing paths are provided between residential areas and agricultural or grazing lands fragmented by the Motorway, in line with the community health and safety measures outlined in the Project ESIA. Upon the end of the temporary usage period, the EPC Contractor will reinstate the land and return it to the relevant institutions.
(v)3	**Non-land related impacts** due to construction (e.g. dust, excavation, traffic, blasting, etc.) that may lead to impact on lands, livestock, other properties, crops, quality and quantity of surface or groundwater resources, etc.)	Owners and formal/informal users of lands and assets – as applicable	To be determined on a case-by-case basis Grievance registers are kept by the SPV – CLOs as part of grievance logs.	-	1) Construction-related Measures: The SPV will ensure that construction-related environmental measures are implemented to avoid, minimise and/pr rectify impact on water resources, air emissions, vibration, etc. in line with the Project ESIA. The SPV will commission baseline surveys of existing building structures and integrity at receptors close to the blasting sites should be undertaken so that impacts and any damage arising from blasting activities can be identified during the periodic monitoring. The SPV will ensure that the construction and works sites temporarily used during construction are rehabilitated upon completion of construction activities at each site in line with the Project ESIA. 2) Monitoring, Grievance Management and Corrective Measures: The SPV will ensure that any claims regarding property or crop damage are investigated and assessed by third-party experts. Cash compensation will be provided to affected persons for all validated claims. Contractor and subcontractor liabilities will be clearly defined in their respective agreements. The SPV will ensure that E&S impacts are monitored as outlined in the Project ESIA and will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase. 3) If livelihood loss is verified, all livelihood costs will be compensated by the EPC Contractor in line with this RAP requirements.
(v)4	Temporary interruption/ disturbance to services and infrastructure (e.g. electricity)	Beneficiaries of affected services, infrastructure – if any	To be determined on a case-by-case basis	-	1) Construction-related Measures: The SPV will ensure coordination with relevant authorities and institutions and will take all necessary on-site measures to minimise the duration and impact of temporary service interruptions or disturbances affecting beneficiaries. 2) Monitoring, Grievance Management and Corrective Measures: The SPV – CLOs will inform service beneficiaries in advance about the schedule and nature of any interruptions and will update them on the Project Grievance Mechanism prior to the start of the interruption. The SPV will ensure and monitor the immediate reinstatement of affected infrastructure and services upon completion of the relevant construction, displacement, or related works. The SPV will implement the Project Grievance Mechanism to collect, manage, resolve, and monitor grievances related to impacts during the construction phase. Any damage to services or infrastructure will be reinstated by the EPC Contractor.
(vi) Impacts During Operation					
(vi)1	Operation phase E&S impacts (e.g. operation phase noise, vibration, air quality, community health and safety)	Residential structures/houses that cannot be mitigated to levels compliant with Project standards through operation phase E&S management plans	To be determined during operation phase E&S monitoring, if any.	-	1) Operation Phase E&S Measures: The SPV will ensure that measures are implemented in line with Project ESIA and subject-specific management plans and procedures. 2) Monitoring, Grievance Management and Corrective Measures: Construction and operation phase impacts on these houses, including potential loss of property value, noise, vibration, and effects on household livelihoods, will be identified through periodic E&S monitoring and stakeholder consultations during the operation phase of the Project. These impacts will be managed through the Project's grievance mechanism.

8. Livelihood Restoration Plan (LRP)

According to IFC PS5, "*the term "**livelihood**" refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering*".

IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) defines **livelihood restoration** as "*the process of restoring (or improving) affected persons' livelihoods to preproject levels (or better)*".

Within the context of the Project, livelihood restoration is required for the following categories of PAPs:

- **Users of affected lands (formal and informal) for income generation**: This includes physically or economically displaced individuals, where land used for income generation is lost or access is restricted and livelihoods are land-based. The users may include owners, shareholders, formal tenants, sharecroppers or informal users of affected private or public lands, such as farmers, households engaged in animal husbandry, beekeeping, forestry activities, etc.
- **Business owners and employees (formal and informal),** who experience loss of income or employment as a result of Project' impacts.

To support the planning of livelihood restoration, improvement, and assistance measures, consultations have been conducted with the following stakeholders as part of RAP surveys:

- **District Directorates of Agriculture and Forestry** in Silivri, Çorlu and Malkara
- **Mukhtars** of affected settlements (consulted in November 2025 and March 2026)
- **Agricultural land users** in affected settlements– both formal and informal users of affected private and public lands including **vulnerable** farmers and households with vulnerable members
- **Households engaged in animal husbandry, beekeeping, forestry, or similar economic activities** in affected settlements – using the lands affected by the Project
- **Owners of businesses (employers)** that will relocate

According to IFC PS5 (paragraph 18, footnote 20), "*Where a project results in both physical and economic displacement, the requirements of paragraphs 25 and 26 (Economic Displacement) should be incorporated into the **Resettlement Action Plan** or Framework (i.e., **there is no need to have a separate Resettlement Action Plan and Livelihood Restoration Plan**)*".

In line with this guidance, the **livelihood restoration, improvement, and assistance measures addressing the economic displacement impacts of the Project have been developed and incorporated into this Chapter of the RAP.**

ÇOK A.Ş. developed and implemented a **Community-level Assistance Programme (CLAP)** between 2019 and 2023 in the Malkara – Çanakkale Section, which also included livelihood restoration and improvement related components. The example packages and programmes implemented by ÇOK A.Ş. in the Malkara – Çanakkale Section under the CLAP, as well as the outcomes regarding their level of success, provide useful insights for developing the specific LRP packages and programmes under this RAP.

Table 8-1 below provides a summary of example packages and programmes that were implemented, proved to be successful, and has been taken into consideration when designing the household-specific LRP packages and programmes under this RAP.

Table 8-1. Example Packages and Programmes

Packages or Programs	Examples Implemented by ÇOK A.Ş. in Malkara – Çanakkale Section

Training programs
(in collaboration with relevant District Directorate of Agriculture and Forestry and third-party implementation partners)
	- Agricultural training:
	  ○ Pest Control and Management
	  ○ Fruit Cultivation
	  ○ Vegetable Cultivation (including trials, plantings)
	  ○ Fodder Crop Cultivation
	  ○ Beekeeping
	- Skill development training

Household-level support packages to be developed based on needs and analysis during RAP implementation	- Distribution of agricultural input materials:
	  ○ Seed support
	  ○ Sapling support
	  ○ Ryegrass seed
	  ○ Beekeeping input support
	  ○ Machinery, equipment and material support

Priority in Project employment	- Physically displaced households - Households exposed to significant economic displacement land acquisition impacts (e.g. when land taken constitutes more than 20 percent of the total productive area of a household, significant cumulative impacts) - Affected households with vulnerable members
Support packages for affected businesses	- Supports under Business Relocation Support Package - Business-specific training (e.g. job-specific, e-commerce, marketing, financial, etc.) - Certification and accreditation support
Community-level support programmes that would **supplement household-level support packages**	- Agricultural machinery, equipment and material support - Construction and repair support for infrastructure and areas supporting livelihood activities (agricultural, animal husbandry) of the communities including affected people - Capacity building support for local cooperatives - Support to local women's organisations and initiatives - Pasture improvement - Afforestation using high-value tree species that yield economic products - Support for establishment of local product markets

In December 2025, a third-party social consultancy firm conducted a **CLAP Completion Audit** to verify whether the Project had fulfilled its livelihood restoration commitments in accordance with international standards, and to assess the overall success and current status of CLAP implementation as of September 2025. The completion audit identified that

- A minimum of **1,372 beneficiaries** across 18 settlements benefited from programmes where economic impacts could be calculated. Compared to unaffected neighbouring settlements, project-affected settlements showed an **overall positive impact** on livelihoods, attributed partly to productive use of expropriation compensation and partly to cost reductions and yield improvements delivered through CLAP programmes.
- The top-performing programmes in terms of income generation were **Fodder Crop Cultivation Training, Ryegrass Planting** and **Beekeeping Training and Input Support**.
- **The programmes that were assessed as unsuccessful or only partially effective** included training sessions on fight against tuta pest, mediterranean fruit fly and vinegar fly; local product sales points in Güneyli and Çokal, and construction/repair of milk collection area in Kavaklıtepe.
- Notable successes in women's economic empowerment and institutional capacity building included the **Women's Cooperative** in Kavaklıtepe and the **Local Product Sales Point for Women** in Ahievren.

As the RAP Implementation progresses, consultations of the SPV with the affected people will continue on ongoing basis and livelihood restoration and improvement measures will be updated as required with input from ongoing consultations with affected households, related authorities and other relevant third parties (e.g. universities, professional organisations, etc.) to be collaborated as necessary.

8.1. Objectives and Key Principles

This LRP has been prepared as a component of the Project RAP to ensure that PAPs whose livelihoods are adversely affected by land acquisition and resettlement are supported in restoring, and where feasible improving, their economic conditions to at least pre-project levels.

The primary objective of the LRP is to address the livelihood impacts of the Project on PAPs who derive their income from agricultural activities or other productive uses of affected land or other assets. Rather than serving as a mechanism for permanent income replacement, the LRP is designed to provide complementary support measures that facilitate the transition of affected households back to productive activity. The measures developed under the LRP are supplementary to, and non-duplicative of, compensation entitlements provided under the RAP.

The LRP further aims to ensure that vulnerable PAPs receive proportionate and appropriate assistance. Livelihood support measures are differentiated according to each PAP's specific circumstances, including land tenure status, the nature of the livelihood affected, the extent of loss, and the feasibility of restoration on alternative land or through alternative means.

The LRP has been developed and will be implemented in accordance with the following key principles:

- Complementarity and Non-duplication

LRP support measures are complementary to the compensation entitlements established under the Turkish Expropriation Law and the RAP. No LRP measure will compensate for the same loss item for which a PAP has already received or is entitled to receive payment under the RAP. This principle will be applied at the level of household-level support packages, which will be assessed and determined on a case-by-case basis to ensure that no overlapping or duplicative assistance is provided.

In accordance with this principle, cash compensation for crops lost as a result of early land entry is addressed under the RAP as a direct compensation measure and is not included within the scope of the LRP to avoid non-duplication. As such, crop compensation provided as a direct payment to PAPs whose standing crops cannot be harvested due to early land entry by the Project is an example of this principle. Regardless of whether an agreement is reached, if land entry occurs before harvest, the crop value is payable. In practice, KGM often refrains from making additional crop compensation payments once the owner or user has received expropriation compensation. Therefore, if land entry occurs before harvest, crop payments will be made by the SPV from the RAP Fund. This will form an integral part of RAP implementation rather than a livelihood restoration measure, as it directly addresses and compensates for the actual impact.

Similarly, the RAP surveys identified parcels in the Ahievran neighbourhood within Section 3 that had been expropriated under the Çanakkale – Malkara Section in 2017, but which have not yet been accessed for construction to date. The PAPs owning and using these parcels have continued to utilise the land following expropriation since 2017. As these PAPs have already received compensation from KGM while continuing to generate income from the expropriated land for multiple harvesting seasons, they will not be eligible for LRP support under the Kınalı – Malkara Motorway Section.

- Eligibility based on Scale of Impact

Eligibility for LRP support is determined on the basis of a documented livelihood impact directly attributable to the Project. PAPs are required to demonstrate the nature and extent of their livelihood loss through the LRP application process, including by providing evidence of land use, production activity, and tenure status. All eligibility decisions will be subject to technical review by the SPV – RAP Implementation Team, with support from the livelihoods implementation partners, as necessary.

- Proportionality

The scope and value of support provided to each PAP will be proportionate to the scale of the impact. Household-level support packages will be calculated on the basis of market data, standard production norms, and the estimated size of the affected or replacement area based on the area lost to expropriation, rather than on the basis of fixed per-household allocations.

- Tailored Support Packages based on Livelihood Restoration and Improvement Potential

LRP support packages will be structured into two categories: packages that are common to all PAPs, and packages that are assigned on the basis of an individual assessment of each PAP's livelihood restoration and improvement needs and opportunities, and eligibilities. Common packages – including agricultural consultancy and training – are available to all economically displaced PAPs regardless of the nature of the livelihood impact experienced.

Activity-specific packages – covering agricultural input support, livestock support, and beekeeping support –will not be automatically assigned on the basis of the livelihood activity lost. Instead, they will be determined through the Final Assessment of Needs and Opportunities conducted by the third-party livelihood implementation partners in consultation with PAPs. The primary objective of this assessment will be to identify the most effective pathway to restore and, where feasible, improve each household's livelihoods to at least pre-project levels. While a PAP's primary livelihood activity will be the starting point for this assessment, support is not limited to that activity. Where the assessment identifies that a secondary activity – such as livestock keeping or beekeeping – presents a credible and viable opportunity to restore or enhance household income, support for that activity may be recommended alongside or instead of support tied solely to the primary activity.

To ensure efficient use of LRP resources and avoid duplication, a PAP will not receive support under more than one activity-specific package unless this is explicitly justified by the needs and opportunities assessment and approved by the SPV. The overriding principle is that support is directed at what will most effectively restore and improve the livelihood of each affected household, rather than at mechanically replacing the specific activity disrupted by the Project.

- Informed Participation

PAPs will be informed by the SPV – RAP Implementation Team of the available support measures, the conditions of eligibility, and the application process through GLAC distribution, individual consultations and, where applicable, public disclosure of relevant informative documentation. Participation in the LRP will be voluntary.

- Accountability

PAPs who undertake procurement of inputs or services under the LRP will be required to submit invoices and supporting documentation prior to reimbursement. The SPV and the implementation partnerwill assume responsibility for technical and financial oversight of the LRP, while procurement will be carried out by PAPs using their own supplier relationships to reduce operational risks.

- Attention to Vulnerability

Additional attention will be paid during implementation to ensuring that vulnerable PAPs are not inadvertently excluded from the support process.

- Transitional Nature

LRP support measures are transitional in nature and are designed to facilitate the restoration of productive activity within a defined timeframe (i.e. during RAP implementation). They do not constitute permanent income replacement or an ongoing financial commitment by the SPV. The RAP implementation period of 36 months is considered sufficient for a PAP to re-establish productive activity – for example, to find a replacement land and successfully establish crops on this land. Once production is restored and support objectives achieved, LRP obligations in respect of the relevant PAP will be considered complete. Community development programmes to be implemented by the SPV may further support livelihood improvement.

- Monitoring and Adaptive Management

The implementation of the LRP will be monitored as part of RAP monitoring to identify any PAPs who may require additional assistance. Monitoring findings will be documented and reported in accordance with the Project's broader RAP monitoring framework. Where monitoring identifies shortfalls or unforeseen impacts, the LRP implementation approach may be adjusted through adaptive management, provided any such adjustments are consistent with the principles set out in this section and remain compliant with IFC PS 5.

8.2. Livelihoods Surveys

The baseline socio-economic conditions, livelihood sources and the needs of the affected settlements and communities for the restoration and, where possible, improvement of livelihoods have been surveyed as part of the RAP field studies, through interviews carried out with the settlement heads (mukhtars) and affected households. The baseline conditions and the livelihood sources of the affected communities and households were presented in Chapter 5.

The potential LRP measures expressed by the affected communities in each settlement are summarised below in Table 8-2. These measures are grouped into the following main categories:

(i) Agricultural input support (including seed, sapling, fertiliser, and other general inputs),
(ii) Livestock support (fodder crop seed, feed, veterinary services, and pasture improvement),
(iii) Beekeeping support (equipment and training), and
(iv) Training and capacity building.

Table 8-2. Potential LRP Measures Expressed by the Affected Communities

Section	Neighbourhood	Agriculture	Livestock	Beekeeping
Section 1 (KM 0 – 35)	**Silivri**			
	Alipaşa	• Seed support	• Fodder crop seed support	--
	Çeltik	• Agricultural input support	• Fodder crop support • Veterinary services • Training	• Beekeeping equipment support, training
	Semizkumlar	--	--	--
	Yolçatı	• Seed support	• Feed and seed support	--
	Sancaktepe	• Agricultural input support • Training	• Input support. Training	• Input support • Training (beekeeping)
	Balaban	• Seed support • Fertiliser support	• Feed and seed support	--
	Değirmenköy	• Seed support • Fertiliser support	• Feed and seed support • Grass/hay support	• Beekeeping equipment support
	Gümüşyaka	--	• Feed and seed support	--
	Marmaraereğlisi			
	Sultanköy	• Agricultural input support	• Fodder crop seed support	• Input support. Training
	Ceditalipaşa	• Agricultural input support	• Space for barn • Feed support • Fodder crop seed support	• Beekeeping equipment support
	Yakuplu	• Agricultural input support	• Livestock input support • Fodder crop seed support. • Veterinary support • Planting/shading of the pond (for livestock)	• Beekeeping equipment support
	Türkmenli	--	• Training • Fodder crop seed support	• Beekeeping equipment support • Training (beekeeping)
	Çeşmeli	--	• Training • Fodder crop seed support • Fodder crop seed support	• Beekeeping equipment support
	Çorlu			
	Seymen	• Seed support • Sapling support • Training	• Feed and fodder crop input support	• Beekeeping equipment support (hive)
	Şahpaz		• Feed and fodder crop input support	• Beekeeping equipment support • Training (beekeeping)
	Türkgücü	• Agricultural input support • Training	• Feed and fodder crop input support • Veterinary support	• Beekeeping equipment support • Training (beekeeping)

Section	Neighbourhood	Agriculture	Livestock	Beekeeping
			• Remediation and conversion to pastureland of the former mining site (at Beşkavak locality)	
Section 2 (KM 35 – 70)	**Çorlu**			
	Remaining settlements in Section 2	• TBD	• TBD	• TBD
	Süleymanpaşa			
	Kayı	• Replacement land	• Hay/grass support	--
	Zafer	--	--	--
	Remaining settlements in Section 2	TBD	TBD	TBD
Section 3 (KM 70 – 105)	**Süleymanpaşa**			
	Seymenli	• Agricultural input support	• Fodder crop seed support • Veterinary support • Training	• Beekeeping equipment support • Training (beekeeping)
	Güveçli	• Input support (fertiliser)	• Fodder crop seed support • Veterinary support • Training	• Beekeeping equipment support • Training (beekeeping)
	Nusratlı	--	--	--
	Karahisarlı	• Agricultural input support • Training	• Fodder crop seed support • Veterinary support	• Beekeeping equipment support
	Nusratfaki	• Agricultural input support • Agricultural equipment supporT	• Fodder crop seed support • Veterinary support	--
	İnecik	--	• Fodder crop seed and veterinary service	• Beekeeping equipment support • Training (beekeeping)
	Akçahalil	• Agricultural input support and training. • Seedling and sapling support	• Fodder crop seed support • Veterinary support	• Beekeeping equipment support • Training (beekeeping)
	Kınıklar	--	• Fodder crop seed support • Pasture improvement	--
	Malkara			
	Yenice	--	--	--
	Hereke	• Agricultural input support	• Fodder crop seed support • Training (fodder) • Veterinary support	• Beekeeping equipment support • Training (beekeeping)
	Ahievran	• Agricultural input support	• Fodder crop seed support • Training (fodder crop) • Veterinary support	• Beekeeping equipment support • Training (beekeeping)

Extensive stakeholder consultations conducted during RAP preparation revealed that affected communities – particularly those at risk of losing agricultural land or having their primary or supplementary income sources affected – are concerned about the potential challenges they may face in sustaining their livelihoods. The key RAP field survey (March 2026) findings from **Section 1 and Section 3** informing the design of the livelihood restoration and improvement measures are summarised below:

- Many respondents emphasized the importance of improved **agricultural inputs**, including certified seeds, seedlings, fodder crop inputs for livestock, fertilisers, pesticides and fuel. This reflects a strong tendency toward yield optimisation on remaining land, particularly among households that have lost part of their productive assets.

- Another prominent pattern is the interest in **livelihood diversification**. Several respondents indicated willingness to shift toward **alternative crops** (vegetables, fruit, vineyards, fodder crops) and **livestock-based production,** and, less frequently, the establishment of greenhouses, orchards, or vineyards. The PAPs interested in diversification appears relatively adaptive and represents a key target for LRP packages, **especially when combined with training and input packages.**

- **Livestock-based production** related requests are often towards fodder crops production, animal inputs, increasing livestock numbers, purchase of feed mixer machine, provision of veterinary services.

- **The respondents indicated interest in training programmes such as** good agricultural practices training, crop diversification and alternative production training, and livestock management training. **Training programs** are required to be designed based on an assessment of local agricultural challenges and potential rather than solely on stated demand. Once appropriate topics are identified, practical, **demonstration-based** training sessions are to be offered in collaboration with local farmers. Participants may not proactively request such opportunities, but when offered clearly and accessibly, interest and attendance are likely to increase – particularly if accompanied by **peer demonstrations or field-based examples**.

- A segment of respondents expressed interest in mechanisation and modernisation, including the purchase of capital-intensive **agricultural machinery and equipment**, such as tractor (estimated cost: TRY 5,000,000 per machine), combine harvester (estimated cost: TRY 2,500,000 per machine), seeder/planter or renewal and modernisation of existing agricultural tools and equipment. In line with the previous CLAP implementation and achievements of the SPV, these suggestions and preferences are considered more feasible when implemented at the community level, given their scale, cost, and potential for shared use, and have therefore been noted for further consideration under the **Community Development Plan** (see Section 8.8).

- A notable number of respondents rely on land-based recovery strategies, such as **purchasing or leasing new agricultural land**. However, these responses are sometimes accompanied by constraints such as increasing land prices and limited land availability. Transitional **rental support** to land users (formal or informal) for replacement land has therefore been included as a component of the livelihood restoration packages. The entitlement matrix (Section 7.3) also includes cash compensation for title deed fees in the case of new land purchases, as mainly envisaged for affected landowners.

- The findings **do not indicate beekeeping** as a commonly preferred or mentioned livelihood strategy among affected households. This suggests that beekeeping is **not** currently a primary production activity. However, it still represents a potential **diversification** option, particularly for households with limited land or those seeking **supplementary income** sources, provided that adequate training and initial support are ensured.

- The RAP survey findings highlight a distinct **vulnerable** group, primarily composed of elderly respondents or those with limited labour capacity due to health issues. These individuals frequently stated that they would not make any investment, or that they are unable to continue agricultural activities due to age or physical limitations. These PAPs cannot not be offered standard livelihood restoration packages such as training or diversification and rather provided with non-farm livelihood options, in-kind assistance and targeted **vulnerability support** that will be developed by the RAP Implementation Team on a case-by-case basis.

- Beyond individual-level needs, responses also point to structural and community-level constraints, such as lack of shared infrastructure (e.g., irrigation systems), need for improved access to agricultural land, among others. A clear majority of households engaged in agriculture indicate **irrigation** as a major

constraint. A substantial number of respondents explicitly identified drilling wells, installing irrigation systems, or transitioning to irrigated farming as primary preferences. The frequent inclusion of specific cost estimates (ranging from hundreds of thousands to several million TRY) indicates the capital-intensive nature of this transition, which is dependent on the availability of water resources. Therefore, this has not been considered a feasible livelihood restoration and improvement alternative at the household level noting that support for installation of irrigation systems, pumps, etc. may be evaluated once requested.

The RAP field surveys included interviews and focus group discussion with **women**. During the household-level RAP surveys, it was observed that women's participation remained limited, primarily due to land ownership and representation patterns, where men are typically registered as landowners and primary respondents. In order to address this gap and ensure women's perspectives were adequately captured, a dedicated women-focused group discussion was organised in Alipasa neighbourhood using a semi-structured questionnaire and following a focus group methodology, with the participation of four women from the settlement. The following are the key findings from these discussions that have been taken into consideration in the development of LRP packages:

- Approximately 10–15 years ago, women worked in the fields while also preparing winter food supplies, resulting in a heavier workload. At present, agricultural activities are mostly carried out by spouses or other family members, while women primarily contribute through household-based production.
- Outside agricultural production, women engage in the preparation of traditional food products such as dried soup mix (*tarhana*), homemade pasta (*erişte*), flatbread (*yufka*), and tomato paste. These activities are typically carried out collectively through an informal cooperation system and reflect a strong culture of solidarity within the community.
- These production activities are mainly for household consumption and do not generally generate direct income. However, it was noted that some women occasionally sell such products, and a local market established by the headman allows limited opportunities for direct sales. One participant indicated that she previously generated income through such activities but is no longer engaged in them. Participants highlighted that these activities are labour-intensive and physically demanding. There is a need for equipment such as tomato paste machines and pasta cutting machines. Due to the lack of shared equipment within the neighbourhood, women rely on nearby settlements to access such facilities.
- Participants and the headman referenced a nearby settlement (Sayalar Village) where government and municipal support (e.g., provision of seeds and machinery) has enhanced production capacity. In contrast, Alipaşa lacks similar support mechanisms and does not have a women's cooperative structure.
- Participants expressed that their lands are fertile and productive, stating that "anything planted can grow," and therefore land loss due to expropriation is perceived negatively. At the same time, there is a general acceptance of the necessity of the Motorway project.
- A key concern relates to the residual (remaining) land parcels after expropriation. Participants stated that these parcels become difficult to use due to irregular shapes and access issues, and that they lose value when offered for sale.
- Although women are not heavily involved in direct income-generating activities, they play a supportive role in production processes. Therefore, any decrease in agricultural production is expected to indirectly affect household income and livelihoods.
- Participants stated that household decisions are generally made through consultation between spouses. The decision-making process varies depending on the issue, with some decisions made jointly and others influenced by either women or men.
- Participants indicated that they have been aware of the project for approximately 3 – 4 years. However, most of this information has been obtained informally through word of mouth rather than official communication channels.
- Participants emphasized the need for support that would facilitate production and reduce workload. In particular, the provision of shared equipment (e.g., tomato paste machines) was identified as a priority need.

8.3. Eligibility for LRP

All individuals whose livelihoods are land-based[105] and who use the affected lands to generate agricultural income – including both formal and informal users, regardless of the total size of their productive agricultural area – **will be eligible for the entitlements and livelihood restoration and improvement measures defined in this RAP**.

These measures will be provided **in proportion to the level of impact experienced** (refer to Section 7.3 for the Entitlements Matrix), for example, the area of agricultural land lost due to the Project.

Livelihood support under the LRP will be provided through both **application-based** and **proactive outreach activities** to be held by the SPV – RAP Implementation Team. While the general public will be able to access support upon application, households that are physically affected (e.g. loss of house or major economic assets) and vulnerable groups will be identified and directly approached to ensure their inclusion in the programme, regardless of whether they have submitted a formal application. The criteria to be considered for eligibility evaluation will be as follows:

- The beneficiary LRP application form is completed by the PAPs, including a written declaration of intent to continue production, **or** the PAP is identified as eligible by the SPV – RAP Implementation Team through proactive outreach activities – in such cases, the application form may be completed either by the PAPs themselves or by the SPV on their behalf.
- Information and documents on ongoing livelihood activities (e.g. total productive area, livestock holding records, farmer registration records, etc.) are provided transparently at the level required by the SPV,
- The land on which livelihood activities will continue is clearly identified (ownership or lease status, and area in m² or decare),
- There is no overlap[106] with items already covered under RAP compensation payments,
- The requested support is proportionate to the level of impact experienced, and
- The support falls within the scope and budget of the RAP (including the LRP component).

[105] The IFI standards recommend that "*in interpreting "land-based livelihoods", it is important to recognise that so-called "backyard agriculture" and other forms of small-scale agriculture (including keeping some livestock) can be critical to the livelihoods of poorer people, particularly elderly pensioners living on small pensions, even in suburban or urban areas. The livelihoods of poorer people are often multidimensional, and affecting just one stream – as small as it may appear – can durably jeopardise their overall livelihood. People whose primary activity is not agriculture may still depend on land to such an extent that depriving them of this land could aggravate poverty. Dependency on small-scale agriculture should therefore not be neglected when determining eligibility and entitlements during the resettlement planning process. (EBRD, December 2025. Guidance Note on ESR5)".* This recommendation will be taken into consideration, where feasible, during the implementation of the LRP.

[106] The principle of "no overlap with items covered under RAP payments" refers to avoiding duplicate compensation for the same loss or cost item under both RAP and LRP.

8.4. Livelihood Restoration Plan (LRP) Packages

The livelihood restoration, improvement, and assistance measures to be provided to agricultural users of affected parcels are summarised in Figure 8-1. Details of each package, including its type, objectives, and a description of the content, are provided in the remainder of this section.

The LRP support to be provided through these packages will not replace entitlement-based payments provided under the RAP, such as those for lands, structures, crops or other direct losses caused by the Project-related land acquisition.

Detailed entitlements for landowners, as well as formal and informal users of affected lands, have been previously presented in Section 7.3.

Livelihood Restoration, Improvement and Assistance Packages	
Package No	**Package Name**
Package 1	External Agricultural Consultancy Support (through Livelihoods Implementation Partners)
Package 2	Agricultural Training Programmes and Livelihoods Diversification
Package 3	**Activity-specific LRP Support Packages**
	3a) Agricultural Input Support
	3b) Livestock Support
	3c) Beekeeping Support
	3d) Support Measures for Other Livelihood Sources
	3e) Household-level Equipment Support
Package 4	Transitional Rental Support to Land Users for Replacement Land
Package 5	In-kind Livelihoods Assistance (through Minor Works and Equipment Provision)
Package 6	Priority in Project Employment
Tailored Support and Assistance for Vulnerable Households and Individuals (*Please refer to Chapter 12 – Vulnerable People, Project-affected Households*)	
Community-level Assistance Programmes (*Please refer to Section 8.11 – Community Development*)	

Figure 8-1. Summary of Livelihood Restoration, Improvement and Assistance Packages for Affected Lands

The needs and preferences of PAPs for the restoration and, where possible, improvement of their livelihoods were discussed in Section 8.2. Taking into account the most commonly expressed requests and preferences of PAPs, together with a preliminary assessment of technical and economic feasibility and relevance, the **following LRP packages** have been developed as part of the RAP.

These packages should be considered as a framework for potential livelihood restoration projects and for indicative budgeting for their implementation. The packages may be diversified within the limits of the RAP budget (including the LRP component) based on evolving PAP needs and preferences, with the objective of implementing the most feasible and impactful initiatives that deliver maximum benefit to affected households.

To this end, the SPV – RAP Implementation Team, where necessary with support from external agricultural consultants as **livelihood implementation partners**, will conduct a final assessment of needs and opportunities in the affected settlements during the early stages of RAP implementation. Based on this assessment, settlement-specific and household-level LRP packages will be finalised for implementation by the SPV. During this stage, additional packages may also be developed, taking into account the alternative investment plans expressed by households, as discussed above.

Package 1 – External Agricultural Consultancy Support (through Livelihoods Implementation Partners)

The content of the support package on external Agricultural Consultancy Support to be offered to agricultural land users is summarised in Table 8-3.

Table 8-3. Package 1: External Agricultural Consultancy Support (through Livelihoods Implementation Partners)

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objectives	This support aims to restore and enhance the agricultural productivity of affected households by providing access to specialised technical expertise. Through external agricultural consultancy, PAPs will be assisted in identifying, designing, and implementing livelihood restoration and improvement activities suited to their specific circumstances following economic displacement.
Eligibility	All households, whose livelihoods are land-based and who use the affected lands to generate agricultural income – including both formal and informal users, regardless of the total size of their productive agricultural area, are eligible to participate in training programs depending on their agricultural activities.
Description of the Package	The SPV will contract livelihood implementation partners to procure external agricultural consultancy services. The implementation partner will engage relevant experts specialised in the design and implementation of livelihood restoration measures. Agricultural consultancy support will be provided to agricultural land users for the development and implementation of household-specific livelihood restoration and improvement projects, in consultation with affected people, as well as relevant governmental and non-governmental institutions. The consultancy services will be provided throughout the RAP implementation period. The main consultancy and advisory services to be delivered will include, but are not limited to, the following: 1) Final Assessment on Needs and Opportunities 1a) As part of the RAP preparation process, consultations were held with affected communities and households to assess their needs and identify feasible livelihood restoration opportunities. These consultations will be further reviewed and refined in collaboration with PAPs and relevant stakeholders to ensure that the livelihood restoration and improvement measures are tailored to local conditions and preferences. 1b) The implementation partners, in coordination with PAPs, District Directorates of Agriculture, and other relevant stakeholders, will evaluate alternative livelihood sources and diversification opportunities, such as cultivating alternative crop types or using agricultural production activities that offer higher yield potential and improved income prospects, using more intensive/productive breeds or diversification into other livelihood sources such as animal husbandry, beekeeping, and similar activities. During the RAP surveys, the following were indicated by PAPs as options to increase their incomes on the remaining lands or alternative areas: • Higher-value/alternative crop varieties (vegetables such as tomatoes, onion, late-season crops) • Viticulture/vineyards • Fruit growing (such as melon, watermelon) • Fodder crops cultivation • Efficient/improved seed varieties • Increasing herd size • Switching to more productive breeds **The final selection of options to be supported under the livelihood restoration and improvement program will be done by the SPV, with support from the livelihood's implementation partners, during the early phases of RAP implementation**, based on the agronomic suitability, local capability, market potential, and alignment with local preferences. Water requirements and availability will be among the key considerations in the evaluation process. 2) Development and Delivery of Agricultural Training Programs

Information	Livelihood Restoration, Improvement and/or Assistance Measure
	The external implementation partner will develop and deliver agricultural training programs, as detailed below under **Package 2**. 3) Assistance to SPV in Development of Household-specific LRP Packages: The external implementation partner will support the SPV – RAP Implementation Team in developing tailored household-level LRP support packages based on the specific needs of each household and in delivering agricultural training programmes, as outlined below under **Package 3.** 4) Provide Consultancy Support for Site Implementation of Measures The third-party livelihoods implementation partners will plan and provide guidance for the distribution of agricultural inputs, materials, and other forms of support to affected agricultural users, as detailed below under **Package 3**. The SPV will ensure the distribution of agricultural inputs and materials under their guidance and oversight.
Budget	Please refer to Section 8.9.

Package 2 –Agricultural Training Programmes and Livelihoods Diversification

The content of the support package on **Agricultural Training Programmes and Livelihoods Diversification** is summarised in Table 8-4.

Table 8-4. Package 2: Training Programs

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objectives	This support aims to strengthen the technical knowledge and practical skills of affected agricultural land users, livestock breeders, and other PAPs, enabling them to sustain and improve their livelihoods following economic displacement. Training programmes will be tailored to the specific needs and activities of participants, covering both formal and informal agricultural practices.
Eligibility	All households (landowner, formal and informal user) affected by economic displacement are eligible to participate in training programs depending on their agricultural activities.
Description of the Package	Agricultural training programmes will be developed and delivered by the third-party implementation partners and qualified trainers to be retained by them. The recipients of the training programmes will be the formal and informal agricultural users affected by the Project's land acquisition, affected livestock breeders and other PAPs. The SPV, with support from the implementation partners, will collaborate with the Tekirdağ and İstanbul Provincial Directorates of Agriculture and Forestry and the relevant District Directorates in Malkara, Süleymanpaşa, Çorlu, Silivri, and Marmaraereğlisi for designating the training subjects and the organisation of training sessions in each district. The organisation of trainings will be undertaken by the SPV, covering the costs of transporting both the trainers and participating landowners and users, as well as travel allowances and other related expenses for the training staff. It should be noted that young and middle-aged farmers may be more open to training, whereas elderly farmers may tend to show little interest. This is largely because elderly farmers are reluctant to change their current practices and are generally hesitant to adopt new crop techniques, crop types, livelihood resources, etc. The interested PAPs will be identified by the SPV, with support from the implementation partners, prior to the delivery of the trainings. The training programmes will be organised separately in each district, as needs and preferences vary across districts. The primary crops grown by affected PAPs are wheat, sunflower, canola, barley, and fodder crops. A smaller number of PAPs also engage in livestock keeping, beekeeping, and market gardening. The SPV, through the implementation partners and the trainers to be retained by them, will deliver

Information	Livelihood Restoration, Improvement and/or Assistance Measure
	training programmes to the affected people. Based on RAP surveys with PAPs, mukhtar surveys, and consultations with the District Directorates of Agriculture and Forestry, the following topics have been identified as potential training subjects. These are areas in which mostly young and middle-aged farmers have expressed interest in receiving training: • **Agriculture:** - **Good agricultural practices** for wheat, sunflower, canola, and barley production, including soil preparation, crop rotation, and yield improvements well as efficient use of fertilisers and pesticides (e.g. application techniques, cost-reduction strategies, and environmentally responsible use of agrochemicals) - **Biological pest control training and provision of relevant agents** to PAPs who participate in training sessions following the completion of the training (one-off support). The specific agents to be distributed will be determined by the third-party livelihood implementation partners. - **Fruit and vegetable (e.g. onion) cultivation training and distribution of seeds, saplings to participants.** The specific vegetable and fruit types and saplings to be distributed will be determined by the third-party livelihood implementation partners. • **Animal Husbandry:** - **Fodder crop cultivation and management**, including seed selection, planting techniques, and optimisation of fodder production for livestock keeping - **Animal husbandry and fodder management** for livestock keepers, including disease prevention, animal health, and pasture management practices - **Preventive healthcare training for ovine breeders** covering the importance of vaccination practices, proper vaccination methods and timing, methods for parasite control, and region-specific animal health issues and related topics. • **Beekeeping and apiculture management**, including hive management, disease and pest control, honey harvesting, and quality improvement techniques. Training will be delivered in a phased and seasonal manner, combining theoretical sessions with practical, hive-based (on-site) training. Initial training will be provided prior to colony establishment, followed by hands-on training during key periods of the beekeeping calendar, including spring colony build-up, summer honey flow and harvesting, and autumn/winter colony management and overwintering practices. Follow-up on-site coaching should be provided after the start of production to reinforce practical skills, troubleshoot issues (e.g. colony health, productivity), and support sustainable beekeeping practices. Training sessions will be delivered in a manner that is accessible to all eligible PAPs, taking into account literacy levels, working schedules, and seasonal agricultural calendars. Training sessions will be timed to avoid peak agricultural periods. Training sessions will be announced in the settlements in advance and will be open to both PAPs and the wider interested community members, where feasible.
Budget	Please refer to Section 8.9.

Package 3 – Activity-specific LRP Support Packages

Activity-specific packages – covering agricultural input support, livestock support, and beekeeping support – will not be automatically assigned on the basis of the livelihood activity lost. Instead, they will be determined through the Final Assessment of Needs and Opportunities conducted by the third-party livelihood implementation partners in consultation with PAPs. The primary objective of this assessment will be to identify the most effective pathway to restore and, where feasible, improve each household's livelihoods to at least pre-project levels. While a PAP's **primary** livelihood activity will be the starting point for this assessment, support is not limited to that activity. Where the assessment identifies that a **secondary** activity – such as livestock or beekeeping – presents a credible and viable opportunity to restore or enhance household income, support for that activity may be recommended alongside or instead of support tied solely to the primary activity.

To ensure efficient use of LRP resources and avoid duplication, a PAP will not receive support under more than one activity-specific package unless this is explicitly justified by the needs and opportunities assessment and approved by the SPV and where a single activity is insufficient to achieve the intended outcomes on its own. The overriding principle is that support is directed at what will most effectively restore and improve the livelihood of each affected household, rather than at directly replacing the specific activity disrupted by the Project. However, within a given package, PAPs may benefit from a combination of different measures.

Package 3a – Distribution of Agricultural Input Materials

The content of the support package on **distribution of agricultural input materials,** such as seeds, seedlings, saplings, fertilisers, plant protection products, etc., is summarised in Table 8-5.

Table 8-5. Package 3a: Distribution of Agricultural Input Materials

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objective	This support aims to restore and enhance agricultural production capacity by enabling PAPs to access essential inputs required for the cultivation of replacement lands, and to support the initial establishment period following economic displacement.
Eligibility	All economically displaced households whose livelihoods are land-based and who use the affected lands to generate agricultural income are eligible, in proportion to the level of impact experienced, and subject to the eligibility criteria defined under the RAP.
Description of the Package	The SPV will ensure the distribution of **seeds, seedlings, saplings, fertilisers, plant protection products**, and, where relevant, **pest control inputs** to affected agricultural users, under the guidance and oversight of the third-party livelihood's implementation partners. In the region, the most commonly cultivated crops include **wheat, sunflower, canola, and barley**. In addition, alternative livelihood options such as fruit cultivation (e.g. walnut growing, including provision of walnut saplings), as well as vegetables and crops such as watermelon, melon, onion, and maize, will be considered. Other alternative crops may also be evaluated, where feasible. Both the meetings held with the District Directorates of Agriculture and Forestry and the survey results from the region indicate that the most common crop rotation system is **wheat + sunflower.** The costs associated with these input materials will be covered by the SPV from the RAP Fund. As part of the Final Assessment of Needs and Opportunities to be undertaken by third-party livelihood implementation partners, the specific needs of affected households will be identified, and the type and quantity of agricultural input materials to be distributed to each household will be determined in consultation with PAPs and, as appropriate, with the District Directorates of Agriculture and Forestry. **One-off** agricultural input support will be provided to PAPs for the cultivation of replacement lands. The input materials will be provided **in proportion to the area lost to expropriation**. Depending on the characteristics of their remaining land and/or other ongoing agricultural activities outside the expropriated area, PAPs will be offered appropriate input packages or similar alternatives, to be agreed upon.
Budget	Please refer to Section 8.9.

Package 3b – Livestock Input Materials and Services

The content of the support package on **livestock input materials and services,** such as provision of fodder crop seeds, feed, veterinary services, etc., is summarised in Table 8-6.

Table 8-6. Package 3b: Livestock Input Materials and Services

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objective	This support aims to restore and enhance livestock-keeping capacity by enabling PAPs to access essential inputs required for the management of their existing livestock, and to sustain production during and after the transition period following economic displacement.
Eligibility	All economically displaced households whose livelihoods are wholly or partially dependent on livestock keeping, and who use the affected land to graze, shelter, or otherwise support livestock activities. Eligible PAPs must demonstrate records on existing livestock-keeping activity. All economically displaced households who undertake livestock keeping as a primary or supplementary livelihood activity may be eligible for support. Priority is given to PAPs who use affected land for the livestock activities. Eligibility may also be extended to PAPs who do not currently engage in livestock keeping, subject to documented interest, previous experience, commitment to continue this as a livelihood activity, and successful completion of the livestock training programme to be provided by the Project as part of the LRP.
Description of the Package	The SPV will ensure the provision of livestock support inputs – including fodder crop seeds, feed materials, veterinary services and medicines, and training in animal husbandry – to eligible PAPs, in proportion to the area lost to expropriation and the scale of livestock activity affected. Distribution will be carried out under the guidance and oversight of the third-party livelihood implementation partners. Query of registered cattle and small ruminant livestock holdings and livestock establishments will be requested from the potential beneficiaries via e-Government (e-Devlet) system. The costs associated with these inputs and services will be covered by the SPV from the RAP Fund. As part of the Final Assessment of Needs and Opportunities to be undertaken by third-party livelihood implementation partners, the specific needs of affected households will be identified, and the type and quantity of livestock support inputs to be distributed to each household will be determined in consultation with PAPs and, as appropriate, with the District Directorates of Agriculture and Forestry. **1) Fodder crop seed distribution:** **One-off** fodder crop seed support will be provided to PAPs to sustain the nutrition of livestock held. Inputs will be provided in proportion to the area lost to expropriation and the number of livestock units maintained. Depending on the type and scale of impact, PAPs will be offered appropriate fodder seed packages or similar alternatives, to be agreed upon. - Ryegrass - Forage barley - Triticale - Oats These species have been selected due to their low irrigation requirements and suitability for local conditions. Irrigation-intensive crops such as alfalfa and vetch have not been included. **2) Veterinary services and animal health support:** PAPs who maintain livestock affected by the Project will be provided with veterinary services and animal health support throughout the RAP implementation period.

Information	Livelihood Restoration, Improvement and/or Assistance Measure
	The objective will be to support sustainable, cost-effective, and profitable small ruminant production through effective herd health management by preventing livestock losses and declines in productivity that may arise from diseases and pests occurring throughout the year, promoting preventive veterinary practices, and enhancing the knowledge and awareness of livestock breeders. The support will be complemented by the relevant training activities outlined under Package 2 (Training Programmes) and will include the following: • **Preventive Veterinary Practices:** Farm visits will be conducted by the experts to be appointed by the Project in the field to provide one-on-one technical support to livestock breeders. Within this scope, the following aspects will be observed and assessed on site: Shelter conditions, animal care and feeding practices, vaccination and parasite control practices, lambing rates and lamb mortality. Any deficiencies identified during these visits will be communicated to the breeders. In addition, practical demonstrations will be provided on injection techniques and medication administration methods, and an annual animal health implementation schedule will be prepared. • **Vaccination and Disease Control:** In addition to the mandatory vaccination programmes implemented by the Ministry of Agriculture and Forestry (such as sheep and goat pox, peste des petits ruminants (PPR), and brucellosis vaccinations), preventive measures against the following diseases will be considered as part of the implementation: ○ Enterotoxaemi (Dose: 2 cc per sheep; 1 cc per lamb) ○ Agalactia (Dose: 2 cc per sheep; not administered to lambs) ○ Parasitic diseases (Injectable treatments are recommended to be administered twice annually – Dectomax injection dose: 1 cc per sheep). Within this scope, preventive vaccination and parasite control measures are particularly recommended during the spring and autumn periods. Vaccination activities may be carried out through service procurement from authorised veterinarians or, provided that the necessary training is delivered, implemented directly by livestock breeders themselves. The prevalence of certain diseases may vary across different regions. For example, while agalactia may present a relatively low risk in some areas, enterotoxaemia is a widespread disease throughout Türkiye and requires preventive measures in all cases. Therefore, preventive veterinary practices should be planned in line with regional needs and disease patterns. Accordingly, the type of veterinary support, including access to medicines and vaccinations that are not provided by the District Directorates of Agriculture and Forestry, or advisory services, will be determined by the third-party livelihoods implementation partners as part of the Final Assessment of Needs and Opportunities. **3) Transitional feed support:** Where livestock production is **temporarily disrupted** due to land acquisition or restricted access to grazing areas during construction, short-term feed support may be provided to eligible PAPs to ensure continuity of livestock nutrition. This support will be time-bound and targeted to bridge the transition period until access to alternative grazing land, fodder production, or regular feed supply is restored. The type and quantity of feed support will be determined by the livelihood's implementation partners based on the number of livestock units affected and the duration of the disruption. Feed support will be provided only to PAPs whose grazing activities are directly impacted and will not be extended to unaffected beneficiaries. Accordingly, it will primarily cover ovine breeders who

Information	Livelihood Restoration, Improvement and/or Assistance Measure
	are users of the affected grazing areas, if any. Indicatively, support is calculated based on daily feeding requirements (e.g. approximately TRY 3,000 per day for a typical size of her – 150 small livestock units – for 2026), where grazing capacity is temporarily affected. **4) Barn Improvement Support** This support will aim improving the conditions, hygiene, and functionality of existing small-scale livestock shelters, thereby enhancing animal welfare and productivity. It will be provided to PAPs who already own livestock shelters and are engaged in livestock production. It will be limited to small-scale producers and will not be extended to large commercial operations and will not be offered to PAPs with no prior livestock experience. Priority will be given to barns smaller than approximately 250 m². The package may include targeted improvements to existing barns depending on the needs, such as: - Flooring improvements - Drainage systems - Limited roof repairs - Reorganisation of internal partitions - Installation or improvement of watering systems - Ventilation improvements - Shading enhancements **5) Livestock Asset Restoration / Increase** This support aims to restore or enhance livestock assets of PAPs whose livelihoods are affected, ensuring sustainable continuation of livestock-based income. Eligibility will be assessed based on: - Availability of an existing barn meeting minimum technical requirements - The PAP's knowledge, experience, and capacity in livestock management - Demonstrated willingness and commitment to continue livestock production - Commitment not to sell the provided animals for a defined period Livestock support will be provided in appropriate numbers and ratios to be determined by the third-party implementation partners, considering good animal husbandry practices (e.g. approximately one ram per 25 sheep). **6) Pasture improvement support (where applicable):** In the Project area, small ruminant breeding dependent on pastures and grazing lands is relatively limited. Therefore, this support will only be considered in cases where significant impacts on grazing activities are identified within the RAP implementation area. Where it is identified that primary pasture and grazing areas within settlements are affected by the Project, and that alternative pasture and grazing lands are insufficient, and that the rehabilitation or improvement of pastureland is a priority need – including planting, provision of simple water ponds and shading, or basic pasture improvement works – such support will be considered on a case-by-case basis. It should be noted that this support is subject to coordination with and approval from the relevant authorities and may require a substantial timeframe to achieve its intended outcomes.
Budget	Please refer to Section 8.9.

Package 3c – Beekeeping Support

The content of the **beekeeping** support package, such as provision of beehives and materials, is summarised in Table 8-7.

Table 8-7. Package 3c: Beekeeping Support

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objective	This support aims to enable eligible PAPs to access essential equipment, inputs, and training required to re-establish, continue or start apiculture production on remaining or replacement land.
Eligibility	All economically displaced households who undertake beekeeping as a primary or supplementary livelihood activity may be eligible for beekeeping support. Priority is given to PAPs who use affected land for the placement of hives or the production of forage for bees. Eligibility may also be extended to PAPs who do not currently engage in beekeeping, subject to documented interest and successful completion of the beekeeping training programme to be provided by the Project as part of the LRP.
Description of the Package	The SPV will ensure the provision of beekeeping support inputs – including - Beehives (8-frame hives with bees + 6 empty hives), - Protective gear (beekeeping veil, gloves), - Apiculture tools (hive tool, brush, uncapping knife, feeder, spur embedder), and - Foundation wax sheets. Where available, collaboration may be established with local beekeepers' associations and universities for the effective delivery of support and training. Distribution will be carried out under the guidance and oversight of the third-party livelihood implementation partners. The costs associated with these inputs and training will be covered by the SPV from the RAP Fund. As part of the Final Assessment of Needs and Opportunities to be undertaken by third-party livelihood implementation partners, the specific needs of affected households will be identified, and the type and quantity of beekeeping support inputs to be distributed to eligible household will be determined in consultation with PAPs and, as appropriate, with the District Directorates of Agriculture and Forestry.
Budget	Please refer to Section 8.9.

Package 3d – Support Measures for Other Livelihood Sources

Affected households may have supplementary livelihood sources other than agriculture, livestock, or beekeeping. Where opportunities indicate potential for improvement, these sources will be evaluated and where feasible supported to restore and enhance the livelihoods of affected people.

Package 3e – Household-level Equipment Support

As part of the LRP package, eligible PAPs will be supported through the provision of household-level equipment to enhance small-scale production and home-based income-generating activities. This package is designed to respond to the specific needs and capacities of affected households, enabling them to improve productivity, diversify income sources, and strengthen economic resilience through practical, accessible interventions. The content and scope of the support package are summarised in Table 8-8.

Table 8-8. Package 3e: Household-level Equipment Support

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objective	This support aims to enhance household-level production capacity and income-generating activities by providing appropriate small-scale equipment tailored to the needs of PAPs. It focuses on supporting home-based production, small-scale agricultural processing, and complementary livelihood activities, with particular attention to improving productivity and diversification of income sources.
Eligibility	All economically displaced households engaged in or intending to engage in small-scale production, agricultural processing, or home-based income-generating activities are eligible. Priority may be given to vulnerable households, including women-headed households, based on the outcomes of the needs and opportunities assessment.
Description of the Package	The SPV will ensure the provision of household-level equipment to support income generation and productivity. The following equipment examples may be considered: - Feed crushers - Tractor-mounted implements - Grass-cutting equipment, - Similar small-scale agricultural tools. - Equipment to support home-based production activities, particularly those carried out by women, such as tarhana (traditional fermented cereal and yoghurt-based food product) processing equipment, pasta cutting machines, tomato processing equipment, and similar small-scale food processing tools. The specific type and quantity of equipment will be determined through the Final Assessment of Needs and Opportunities, in consultation with PAPs and, where relevant, local authorities. Distribution will be carried out under the guidance and oversight of third-party livelihoods implementation partners.
Budget	Please refer to Section 8.9.

Package 4 – Transitional Rental Support for Replacement Land

As part of the LRP package, the affected land users (formal and informal on private or public lands), whose lands will be expropriated and who will consider renting an alternative land, will be proposed a one-year land lease fee. The content of the support package on **rental support for replacement land to be rented** is summarised in Table 8-9.

Table 8-9. Package 4: One-year Rental Support to Land Users for Replacement Land to be rented

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level(for the formal and informal land users who are not the owners of the affected private or public lands)
Objectives	This support aims to facilitate access to replacement agricultural land by enabling PAPs to afford the initial rental cost, thereby encouraging them to secure replacement land and continue their livelihood activities without interruption.
Eligibility	All renter households and informal land users affected by economic displacement, who find replacement land for formal lease, are eligible.
Description of the Package	To support PAPs who do not own the land they use for agriculture, the SPV will provide compensation or support equivalent to the **one-year rental cost** of the lost agricultural land. In addition, the SPV will assist PAPs in coordinating with relevant authorities and institutions to identify and access comparable rental land. Where feasible, this may involve the continuation of the rental agreement with the previous landlord for an alternative agricultural parcel, preferably one offering improved quality and greater tenure security. The rental allowance will be determined based on the maximum market rental rates for the type of crops to be cultivated on the replacement land, as specified in the national Farmer Registration System for the applicable year.
Budget	Please refer to Section 8.9.

Package 5 – In-kind Livelihoods Assistance (through Minor Works and Equipment Provision)

As part of the LRP package, eligible PAPs whose livelihoods have been affected by the Project will be provided with in-kind support through minor works, construction assistance, and the provision of machinery and equipment. This package is designed to address site-specific needs that may constrain agricultural productivity and access to land, such as surface drainage issues, limited land usability, or access constraints. The support will focus on practical, small-scale interventions that can be implemented using on-site resources, including basic land improvement, drainage arrangements, and access facilitation works, while excluding large-scale construction or infrastructure activities. The content and scope of the support package are summarised in Table 8-10.

Table 8-10. Package 5: In-kind Livelihoods Assistance (through Minor Works and Equipment Provision)

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Type of Support	Household-level
Objectives	This support aims to facilitate agricultural productivity and access to land by providing in-kind technical assistance through minor works, machinery, and equipment, thereby enabling PAPs to sustain and enhance their livelihood activities following land acquisition.
Eligibility	All economically displaced households requiring in-kind livelihood support as described under this package are eligible.
Description of the Package	The SPV will facilitate the provision of in-kind support through the on-site construction teams, machinery, and equipment to address site-specific needs of affected households. The type and scope of support will be determined through a dynamic process, based on needs arising throughout implementation, in consultation with PAPs and, where relevant, local authorities. Any needs requiring approval from relevant authorities will be addressed only to the extent permitted by such authorities. The support to be provided under this scope does not include large-scale land reclamation, deep infrastructure works, reinforced concrete platforms, or extensive construction activities. It may include, but is not limited to, the following: - Provision of support through construction teams, machinery, equipment or materials - Support for on-site surface drainage through simple water discharge and diversion arrangements - Limited ground improvement works such as levelling involving no major excavation or fill operations - Provision of construction machinery and equipment for simple land arrangement works near sites where site mobilisation and construction have started, arrangements to enhance access to agricultural lands - Preparation of feed, fertiliser, and similar storage areas with suitable flooring, drainage systems, and bunding. - Translocation of affected trees
Budget	To be covered under the EPC Contractor's Project budget; no separate cost allocation is foreseen under the RAP Fund.

Package 6 – Priority in Project Employment

As part of the LRP package, priority in Project-related employment will be provided to eligible PAPs whose livelihoods are affected by the Project. This measure aims to support income restoration by facilitating access to job opportunities during the construction and, where feasible, operation phases. The approach focuses on giving preference to vulnerable households, economically displaced individuals, and those significantly impacted by land acquisition, in line with Project employment requirements. The details of this support measure are summarised in Table 8-11.

Table 8-11. Package 6: Priority in Project Employment

Information	Livelihood Restoration, Improvement and/or Assistance Measure
Objectives	This support aims to restore and support the livelihoods of PAPs by providing priority access to Project-related employment opportunities. It seeks to mitigate income loss resulting from land acquisition and livelihood disruption by facilitating temporary and, where feasible, longer-term employment during the construction and operation phases. It also aims to enhance the economic resilience of vulnerable and significantly affected households by enabling their participation in the Project workforce, subject to their qualifications, skills, and compliance with health and safety requirements.
Eligibility	Eligible beneficiaries include PAPs who have been economically displaced or whose livelihoods have been adversely affected by the Project. Priority will be given to: - Households experiencing significant impacts on agricultural land or income sources (e.g. loss of a substantial portion of productive land) - Vulnerable households, including those with limited income-generating capacity - Unemployed members of affected households who are actively seeking work All eligible PAPs must meet the Project's employment criteria, including relevant skills, qualifications, and compliance with occupational health and safety requirements.
Level of Support	Household-level
Description of the Package	At least one member of the households with vulnerable members or households that experience significant impact on their agricultural business integrity due to loss of agricultural land through Project-related expropriation will be given priority in Project employment during construction phase should they meet Project's employment criteria (e.g. education, skills, H&S considerations, etc.). Unemployed female members of physically and/or economically displaced households who are actively seeking employment will be given priority for job opportunities within the Project –during both the construction and operation phases – subject to their qualifications and skills.
Budget	To be covered under the EPC Contractor's Project budget; no separate cost allocation is foreseen under the RAP Fund.

8.5. Implementation Tasks

Livelihood support under the LRP will be provided through both application-based and proactive outreach activities to be held by the SPV – RAP Implementation Team. While the general public will be able to access support upon application, households that are physically affected (e.g. loss of house or major economic assets) and vulnerable groups will be identified and **directly approached** to ensure their inclusion in the programme, regardless of whether they have submitted a formal application.

- **Demand-driven** by the PAPs
- **Proactive outreach** by the SPV – RAP Implementation Team

The key implementation tasks will be as follows:

1) PAP Notification and Entitlement Disclosure by SPV: Following the approval of the RAP, including the LRP, by the Lenders and the LESA, PAPs will be informed by the SPV – RAP Implementation Team of their RAP entitlements, including the scope and availability of livelihood restoration support under the LRP component of the RAP. Information will be provided in a clear and accessible format, covering eligibility criteria, available support packages, the application process, and the grievance mechanism. Notification will be carried out through distribution of GLAC, individual meetings, and where needed, group information sessions organised by the SPV.

2) Final Assessment of Needs and Opportunities: The third-party livelihood implementation partners will conduct the Final Assessment of Needs and Opportunities at the household level, in consultation with PAPs and relevant local institutions, including the District Directorates of Agriculture and Forestry, as needed. This assessment will identify PAP's livelihood restoration and improvement needs, taking into account the nature and scale of the impact, existing livelihood activities, tenure status, vulnerability, and the potential for livelihood improvement beyond simple restoration.

3) Definition of Tailored Support Packages: Based on the Final Assessment, tailored household-level LRP packages will be defined in consultation with PAPs, taking into account affected land size, crop types, livestock holdings, existing production practices, and budget constraints. PAPs will be informed by the SPV of the available support and the budget allocated for their household-specific package. Where a PAP's livelihood improvement potential points to a secondary activity – such as livestock keeping or beekeeping – this will be reflected in the support package as appropriate.

4) PAP Procurement of Inputs: Procurement of agricultural input materials, equipment, and services will be carried out directly by PAPs from suppliers of their choice and/or familiarity. The SPV will not directly purchase inputs on behalf of PAPs, unless the PAPs lack the capacity to do so (e.g. vulnerable PAPs). The SPV and third-party livelihood implementation partners will provide supervision, review, and approval throughout the procurement process, and may assist PAPs in identifying reliable vendors where needed. Where required, one or multiple quotations may be requested in advance of purchase to ensure alignment with the defined scope and budget. PAPs will be required to retain invoices and supporting documentation for all purchases.

The main rationale for this procurement approach is summarised below:

- Producers already work with local markets and suppliers, which facilitates the timely and appropriate procurement of inputs in terms of quality, type, and timing.
- In agricultural inputs such as seeds, seedlings, variations in type, quality, and supplier preference depend on producer experience; therefore, direct procurement by the SPV may create technical and commercial risks.
- Procurement carried out by producers reduces the risk of disputes arising from “inappropriate input selection” or “low productivity”.

5) Technical Verification and Approval for Reimbursement: Prior to reimbursement, all procured inputs and services will be subject to technical verification by the SPV teams and/or relevant third-party implementation partners to confirm suitability, quantity, and compliance with the approved support package.

6) Reimbursement and Payment by SPV: Payments will be made by the SPV to the PAPs upon submission of invoices and supporting documentation confirming that procurement has been completed in accordance with the approved package. All payments will be made within the approved scope and budget limits. Records of all payments will be maintained to ensure transparency and auditability.

7) Technical Guidance and On-site Advisory Support: Where relevant, PAPs will receive technical guidance on the effective use of procured inputs, including through training sessions and on-site advisory visits provided by the third-party livelihood implementation partners. Advisory support will be timed to coincide with the relevant agricultural season to maximise practical impact.

8) Monitoring and Adaptive Management: The SPV – RAP Implementation Team, with support from the implementation partners, will monitor the use of distributed inputs and the progress of livelihood restoration at the household level, and will provide follow-up support as needed to ensure effective utilisation and contribution to livelihood restoration objectives. Where monitoring identifies shortfalls or households requiring additional assistance, corrective measures will be considered through adaptive management.

8.6. Implementation Roles and Responsibilities

The Project will have a dedicated RAP Implementation Team, as outlined in Section 14.3. The RAP Implementation Team will be responsible for the LRP implementation and the delivery of LRP packages and programmes outlined in this Chapter, **as part of the RAP implementation**.

The SPV – RAP Implementation Team will be supported by **third-party agricultural consultants as livelihood implementation partners,** as needed. The indicative scope of work for the third-party livelihood implementation partner is provided in Table 8-12.

Table 8-12. Indicative Scope of Work for the Third-party Livelihood Implementation Partner

Role	Specific Requirements	Indicative Scope of Work
Third-party Livelihood Implementation Partner– External Agricultural Consultants (Recommended team composition: **1 part-time** LRP implementation coordinator + **3 full-time** field-based LRP implementation officer)	• Adequate relevant experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• Conduct baseline review and final assessment of needs and opportunities for the affected households during the early stages of RAP implementation. • Provide consultancy support in designing household-specific livelihood restoration and improvement projects, in close consultation with affected people and relevant stakeholders such as District Directorates of Agriculture and Chambers of Agriculture. • Provide consultancy support in designing community-level applications that would support LRP • Develop tailored agricultural training programmes at the community or household level to support sustainable livelihood improvement • Where necessary, support the SPV in the planning and delivery of training programmes. • Assist households in conducting demonstration cultivation and harvesting activities as part of practical livelihood restoration support.

The resources necessary for LRP implementation, such as offices, information bulletins, vehicles, printed copies of the information materials, etc., will be provided by the SPV as part of RAP implementation.

8.7. Schedule

Table 8-13 presents an indicative schedule for LRP implementation.

The schedule may be updated as needed following the appointment of in-house experts responsible for LRP implementation and assignment of LRP implementation partners, and at any time throughout RAP implementation.

Table 8-13. Indicative LRP Implementation Schedule

No.	Tasks	2025	2026				2027				2028				2029			
		Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Financing and Construction																		
1.	Final RPF	done																
2.	Finance Agreement Signing			done														
3.	Final RAP																	
4.	Site Mobilisation for Construction			done														
Capacity																		
5.	Appoint in-house experts responsible for LRP imp.																	
6.	Contract LRP Implementation Partners																	
LRP Implementation Planning																		
7.	Final Assessment on Need and Opportunities under LRP																	
	Section 1 (KM 0 – 35)																	
	Section 2 (KM 58 – 60)																	
	Section 2 (remainder)																	
	Section 3 (KM 70 – 105)																	
8.	LRP Implementation Plan based on Final Assessment																	
LRP Site Implementation																		
9.	Start Notification of Settlements of LRP support packages																	
10.	Start Development of Household-specific LRP Packages																	
11.	Pilot Implementation																	
12.	Site Implementation and Delivery of LRP Packages																	

8.8. Key Monitoring Indicators

The monitoring and reporting framework for RAP implementation, including monitoring indicators for internal monitoring, is presented in Chapter 13.

The LRP aims to restore, and where feasible improve, the livelihoods of economically displaced PAPs to at least pre-project levels. The key monitoring indicators for LRP monitoring as part of RAP monitoring are presented in Table 8-14.

Table 8-14. LRP Monitoring Indicators

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during LRP Implementation)	KPI?
1.	Overall spending by SPV from LRP fund (with breakdown according to support types, disaggregated by settlement and gender)	Financial records	Monthly	**Yes**
2.	Number of affected settlements where PAPs have been notified of LRP support packages	Records	Quarterly	**Yes**
3.	Number of eligible PAPs who have received at least one form of LRP support, disaggregated by settlement and gender	Through surveys	Quarterly	**Yes**
4.	Number of affected settlements where PAPs are provided with the opportunity to attend at least one LRP training programme, with distribution by type of training (agriculture, livestock, beekeeping, business, etc.)	Through surveys	Quarterly	No
5.	Number of vulnerable PAPs, who have received at least one form of LRP support assisted through LRP	Through surveys	Quarterly	**Yes**
6.	Number of full-time and part-time staff under Project organisation, supporting LRP implementation	HR records	Quarterly	**Yes**
7.	Number of qualified implementation partners contracted	Procurement records	Quarterly	**Yes**
8.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	**Yes**

8.9. Budget

Table 8-15 presents a summary of the LRP budget. The approach used for estimating the LRP package budgets, as part of the overall RAP Fund outlined in Section 8.4, is further described following the table.

During RAP implementation, and prior to the delivery of household-level packages where required, the budget for household-based LRP packages will be separately calculated by the SPV – RAP Implementation Team, with support from third-party implementation partners, as needed.

Table 8-15. LRP Budget Summary

Packages	Indicative Budget (EUR)
Package 1: External Agricultural Consultancy Support	970,000.00
Package 2: Agricultural Training Programmes	
Package 3: Activity-specific LRP Support Packages 3a) Agricultural Input or Equipment 3b) Livestock Support 3c) Beekeeping Support 3d) Support Measures for Other Livelihoods Sources 3e) Household-level Agricultural Equipment	2,813,872.55
Package 4: Transitional Rental Support to Land Users for Replacement Land	275,115.12
Package 5: In-kind Livelihoods Assistance (through Minor Works and Temporary Equipment Provision)	Included in the Project Budget
Package 6: Priority in Project Employment	Included in the Project Budget
Total	**4,058,987.67**

Package 1 and 2: External Agricultural Consultancy Support (through Livelihoods Implementation Partners) and Agricultural Training Programmes and Livelihoods Diversification

The team required for effective LRP implementation would consist of the following composition:

- **1** part-time LRP implementation coordinator
- **3** full-time field-based LRP implementation officer

The team will be based at the Project offices, equipped with the necessary vehicles and equipment to ensure mobility, and will provide implementation support to the Project throughout the RAP implementation period, as needed. The SPV may also choose to establish a competent in-house implementation team under the broader RAP Implementation Team structure and allocate this budget to in-house resourcing, as required during RAP implementation.

Table 8-16. LRP Budget for Package 1

Year	Scope	Budget (EUR)
Year 1	Needs and Opportunities Assessment, LRP Roll-out with Pilot Implementation	350,000.00
Year 2	LRP Implementation	485,000.00
Year 3	LRP Implementation, Monitoring and Evaluation	135,000.00
Total (EUR)		**970,000.00**

Package 3: Activity-specific LRP Support Packages

The budget estimation for Package 3 is provided in Table 8-17.

Table 8-17. LRP Budget for Package 3

Sub-package	Budget (EUR)
3a) Agricultural Input or Equipment Support	862,972.55
3b) Livestock Support	
Fodder crop distribution, barn improvement, asset increase, HH-level equipment	879,750.00
Transitional feed support, pasture improvement	599,400.00
Veterinary services	360,000.00
3c) Beekeeping Support	111,750.00
3d) Support Measure for Other Livelihood Sources	Included under 3a, 3b, 3c
3e) Household-level Agricultural Equipment	Included under 3a, 3b
Total (EUR)	**2,813,872.55**

Agricultural Input or Equipment Support:

Agricultural input support will be provided to land users in accordance with the most common crop rotation system in the region. In this context, both the meetings held with the District Directorates of Agriculture and Forestry and the survey results from the region indicate that the most common crop rotation system is **wheat and sunflower.** Therefore, an input support calculation for one crop rotation period has been carried out for land users affected by expropriation, as well as for users cultivating treasury-owned land (occupiers). Initially, seed, fertiliser, and pesticide inputs were considered within the scope of the input support. The per decare usage quantities for these products were evaluated based on the figures provided by the District Directorates[107] of Agriculture and Forestry.

For privately owned parcels subject to one-off expropriation, input support for wheat and sunflower (seed, fertiliser, and pesticide) calculated over the expropriated area is presented in Table 8-18 below in terms of quantities and unit prices.

As an alternative to agricultural input support, households may opt to receive contributory support for the purchase of household-level equipment. In such cases, the budget calculated for the household's agricultural input support in proportion to the area affected by land acquisition will be allocated for equipment support. The type of equipment to be supported will be determined based on household needs assessments and consultations conducted during RAP implementation.

Table 8-18. Input Support Amounts for Wheat + Sunflower Crop Rotation by Districts

Crops	Silivri	Marmaraereğlisi	Çorlu, Süleymanpaşa, Malkara (*)
Sunflower			
Seed	450.00	400.00	440.00
Fertiliser	562.50	425.00	543.00
Pesticide	106.25	220.00	220.00
Total – Sunflower	**1,118.75**	**1,045.00**	**1,203.00**
Wheat			
Seed	420.00	412.50	412.50
Fertiliser	1,087.50	1,174.40	1,146.00
Pesticide	638.75	458.00	474.00
Total - Wheat	**2,146.25**	**2,044.90**	**2,032.50**
Crop Rotation Total (TRY/da)	**3,265.00**	**3,089.90**	**3,235.50**
Crop Rotation Total (TRY/m²) (**)	**3.27**	**3.09**	**3.24**

(*) Since the Süleymanpaşa and Malkara District Directorates of Agriculture and Forestry did not provide detailed cost tables, the data from the Çorlu District Directorate of Agriculture and Forestry were used as the basis for these districts.
(**) Fractional values for per-square-metre unit support amounts were rounded up to the nearest upper value.

[107] Since the Süleymanpaşa and Malkara District Directorates of Agriculture and Forestry did not provide detailed cost tables, the data from the Çorlu District Directorate of Agriculture and Forestry were used as the basis for these districts.

Livestock Support:

Budget for livestock support has been calculated considering the livestock (ovine and bovine) holdings in the relevant settlements (as declared by the settlement heads) based on the following assumptions:

- **Fodder crop distribution, barn improvement, asset increase, household-level equipment** (such as feed mixer machine, feed crusher) – up to EUR 3,000.00 per-household budget was allocated based on the cost of one bovine. **The indicative unit cost for barn improvement is approximately EUR 30.00 per m²**[108] (amounts up to approximately EUR 2,350.00 for 80 m² basic barn).
- **Transitional feed support –** calculated for ovines only, to compensate for potential access restrictions to grazing lands during construction in settlements with affected pasture lands (assuming 240 grazing days per year, daily 0.5 EUR feed cost per ovine with the 2026 prices)
- **Veterinary services –** during the RAP implementation period, veterinary services, including veterinary visits and vaccination services to be determined by the veterinarian, are envisaged for 10 days per month (in total 360 person – days support throughout the implementation period) in settlements where livestock activities constitute a primary source of income.

Beekeeping Support:

For 2026, the indicative cost of the full input starter package (8-frame hives with bees + 6 empty hives + equipment), is approximately EUR 1,500.00, with an estimated annual income potential of around EUR 750 under appropriate conditions.

Package 4: Transitional Rental Support to Land Users for Replacement Land

The transitional rental support to be provided to formal and informal land users for replacement land has been calculated based on current rental values for dry farmland in the Project-affected districts, using data obtained from the District Directorates of Agriculture and Forestry. These values vary by district and have been cross-checked with information collected from PAPs during the RAP field surveys.

As this support targets both formal and informal land users, tenancy rates across the three sections of the motorway have also been derived from RAP field surveys and incorporated into the calculations.

Table 8-19 presents the LRP budget calculated for Package 4: Transitional Rental Support to Land Users for Replacement Land.

Table 8-19. LRP Budget for Package 4

Section	Expropriated Private Parcel Area (m2)	Land Rental Value as indicated by the District Directorates (TRY/m2)	Average Rental Value as indicated by the PAPs during RAP Surveys (TRY/da)	Rate of Renters (%)	Total Budget for Rental Support
	1	2	3	4	4=1x3x4
Section 1	4,970,684.31	2.00	2.5	0.50	6,213,355.39
Section 2	6,032,990.28	2.00	2.5	0.40	6,032,990.28
Section 3	3,113,007.39	1.75	2.5	0.40	2,334,755.54
Total (TRY)	**14,116,681.98**	-		-	**14,581,101.21**
Total (EUR)					**275,115.12**

[108]As a reference, according to the **Communiqué on the Approximate Unit Costs to Be Used in the Calculation of Architectural and Engineering Service Fees for the Year 2026 published by the** Ministry of Environment, Urbanisation and Climate Change, the unit construction cost for construction of simple livestock and agricultural products (Structure Class **I-A**) is **2,600 TRY/m²** while the unit construction cost for simple paddocks and ovine shelters (Structure Class **I-B**) is **3,900 TRY/m²** (https://www.resmigazete.gov.tr/eskiler/2026/02/20260203-4.htm).

8.10. Constraints

The implementation of LRP measures may be subject to the following constraints:

- **Limited availability of suitable and accessible replacement land** may restrict the ability of PAPs to find alternative lands to restore their agricultural activities, particularly in areas where land is already intensively used (i.e. İnecik). This may affect the feasibility of certain livelihood restoration options and delay the re-establishment of production activities.
- **Not all PAPs may be equally informed about available support**, leading to lower participation among certain groups. Participation levels may also vary, particularly among elderly PAPs or those reluctant to adopt new practices, which may limit the uptake and effectiveness of certain support measures such as training or diversification activities. Households that are less engaged or less confident may not apply, even when they are eligible and in need of support. Therefore, the Project will seek to adopt a more **proactive approach**, with support from implementation partners where required, to enhance outreach, awareness, and capacity building. This said, implementing a proactive outreach approach and processing individual requests in this scale of major linear infrastructure project, assessments, and approvals may increase implementation complexity and time requirements for the SPV – RAP Implementation Team, leading to delays in the implementation progress.
- **Requested support may not always be technically, economically, or environmentally feasible** within project constraints, which may reduce the participation levels. For example, agricultural productivity and the feasibility of certain crops or activities are dependent on water availability, while the majority of the affected land along the Project route consists of non-irrigated dry farmland.
- **The timing of support delivery** (e.g. input distribution, training, minor works) must align with agricultural seasons, which may constrain implementation timelines.
- **Changes in input costs and market access conditions** may affect the economic viability of proposed livelihood restoration activities.
- Certain support measures (e.g. pasture improvement, water-related interventions, minor infrastructure) may require **coordination with and approval from relevant authorities**, which may result in delays or limitations in implementation.
- Some PAPs, particularly **vulnerable groups**, may face challenges in procuring inputs or implementing activities without additional support.

8.11. Community Development

The SPV implemented a **Community Level Assistance Programme (CLAP)** in Malkara – Çanakkale Section between 2019 and 2023 across 32 settlements affected by the Project, with the primary objective of restoring and where possible improving the socio-economic situation of people affected by the activities. The CLAP was implemented by the SPV with support from a third-party implementing partner.

The CLAP comprised **four** thematic programmes covering **(i) skills development and market access, (ii) institutional capacity building, (iii) natural resource management, and (iv) community health, safety and wellbeing**.

Informed by a baseline needs assessment and structured community consultations, the programme included delivery of livelihood restoration and improvement related components, including **agricultural and vocational trainings**, provision of **shared-use agricultural machinery and equipment items**, **fodder crop seed support** to yield quality feed, and **vegetable seed distribution**. The programme also included quick impact projects, support to vulnerable and disadvantaged households, and direct assistance to farmers who were significantly affected by the land acquisition. The CLAP has been a demonstrably successful model for community development, supporting the restoration and improvement of the livelihoods of PAPs within the affected communities as part of a broader development programme.

Building upon the successful examples and experience gained from the Malkara – Çanakkale Section of the motorway, the SPV will develop and implement a **Community Development Plan (CDP)** with the objective of maximising the Project's **long-term** positive impacts on local communities by enhancing economic opportunities and generating employment.

Examples of the community-level supports provided by the SPV in Malkara – Çanakkale Section are listed in Table 8-1**. These were mainly delivered to cooperatives and mukhtars for common community use** rather than individual ownership. During the RAP field survey conducted as part of this RAP, PAPs from Ahievran neighbourhood, a settlement affected by both the Kınalı – Malkara and operational Malkara – Çanakkale motorways, as well as Hereke neighbourhood(both in **Section 3**) expressed their appreciation of the community-level benefits achieved through the agricultural machinery and equipment support provided in their settlement as part of the CLAP implementation.

The CDP will go beyond impact mitigation and aim to deliver additional sustainable benefits to local communities beyond Project's construction phase. It will outline specific projects to be implemented, based on a needs assessment (e.g., vocational training, capacity development, etc.). It will have a dedicated budget, which will be defined in the plan and allocated and managed by the SPV.

Projects developed under the CDP may support the implementation of the RAP, particularly, LRP, depending on their timing, nature and objectives. In this context, initiatives aimed at supporting agricultural activities within the communities will take into account the feedback received from PAPs during RAP surveys.

The final list of community development projects to be supported will be determined by the SPV in accordance with its corporate policies, with technical input from the livelihoods implementation partners, and in consultation and collaboration with the District Directorate of Agriculture and Forestry and academic experts from Çanakkale Onsekiz Mart University, as needed particularly for the agricultural projects. This process will be guided by the outcomes of the final needs and opportunities assessment to be conducted as part of RAP (including LRP) implementation.

Table 8-20. Community-level Support implemented by the SPV in Malkara – Çanakkale Section

Category	Examples Implemented by ÇOK A.Ş. in Malkara – Çanakkale Section

Agricultural machinery and equipment support
 	
(see Table 8-21 for indicative costs of selected machinery, equipment, etc.)
	- **Agricultural Machinery and Equipment**
	  ○ Pulveriser spraying machines
	  ○ Feed crushing machines
	  ○ Tomato paste machines
	  ○ Onion planting machine
	  ○ Solid fertiliser spreader trailers
	  ○ Land levelling machine
	  ○ Sunflower stalk chopping machine
	  ○ Wheat selector
	  ○ Walnut peeling machine
	  ○ Feed mixing machine
	- **Fodder and Grass Management Equipment**
	  ○ Weed / grass mower / harvester
	  ○ Line weed mower
	  ○ Grass collector
	- **Irrigation and Water-Related Equipment**
	  ○ Mobile water tanker
	  ○ Water tank and drip irrigation system installation
	- **Infrastructure-Related Equipment / Facilities**
	  ○ Weighbridge (truck scale)
	  ○ Agricultural machinery washing areas and equipment
	  ○ Product drying areas

Capacity building support for local cooperatives	- Capacity Building Trainings for Cooperatives - Boiler Support to the Milk Producers Cooperative - Container (office use for cooperatives)
Support to local women	- Support to local women's organisations and initiatives - Work-facilitating equipment for women (e.g. kitchen equipment, hand tools)
Support for establishment of local product markets	- Establishment of a roadside marketplace through collaboration with the local cooperative and municipality - Construction of a wooden product sales area - Installation of repurposed containers as product sales areas *handed over to the mukhtars' offices) - Conversion of an existing community structure into a covered market area enabling year-round market operation
Improving existing grazing areas	- Improvement of communal grazing lands over years in collaboration with academia and Provincial Directorate of Agriculture and Forestry - Weed control through herbicide application - Top-seeding with productive, high-quality forage plant species following weed clearance to enrich vegetation cover
Others	- Construction and repair support for infrastructure and areas supporting livelihood activities (agricultural, animal husbandry) of the communities including affected people - Waste water pump (under another programme component)

Table 8-21. Indicative Costs for Community-level Agricultural Machinery, Equipment, Facility Support

Machinery	Indicative Budget (EUR)
Combine harvester	50,000.00
Feed mixer machine (*yem karma makinesi*)	20,000.00
No-till (direct) seeding machine (*anıza ekim makinesi*)	20,000.00
Greenhouse investment (per decare)	20,000.00
Large baler machine	4,000.00
Agricultural machinery washing area (100 m^2)	5,000.00

9. Resettlement Sites

The resettlement sites for physical displacement may be urban (district or city centres) or rural depending on the preferences of each affected household. Relocation to urban areas may force affected people into wage labour and disrupt their agrarian way of life. The current Turkish expropriation laws do not allow for land-for-land compensation in most cases, despite the existence of a 'barter' clause, which remains largely unused in practice due to land scarcity or high land value. Therefore, the options for resettlement will be as follows:

- **Urban** resettlement (for example in district centres):
  - Moving into second homes owned by affected households
  - Purchasing or renting a new house from the market, subject to market availability
- **Rural** resettlement:
  - Moving into **second** homes owned by affected households
  - Purchasing or **renting** a new house from the market
  - Constructing a new house on an alternative land owned by the affected households or land to be allocated by the relevant authorities, if feasible

There are no affected houses identified within Section 3 (KM 70 – 105), where expropriation procedures have been ongoing since 2024. The household survey results indicate that permanent residential use among affected households in Section 1 (KM 0 – 35) and Section 2 (KM 35 – 70) is very limited. Of the 43 households that will be physically displaced, only **5 households** (in Section 2) currently reside in the affected houses on a permanent basis, while the vast majority use the structures seasonally, occasionally, or as weekend houses. There is only one **business** (marble processing plant) that will require relocation in Kayı neighbourhood (BUS-0/1570) near KM 60+500 in Section 2.

Consultations conducted with affected people during the RAP field surveys in December 2025 and March 2026 indicated that awareness of the Project among stakeholders in Section 1 and Section 2 (particularly around KM 58 – 60) has only recently increased. This is primarily because the Project has only recently progressed to the expropriation stage through Article 8 negotiation meetings in Section 1 and, to a limited extent, in Section 2.

Given the limited number of permanently residing households, it is anticipated that many affected households may **not** require immediate replacement housing arrangements. Based on consultations and previous resettlement experience in similar projects, affected persons generally tend to evaluate their relocation preferences and initiate concrete resettlement planning after statutory compensation payments are received from the state and once they become fully informed by the SPV about the entitlements, assistance measures, and support packages available under the RAP. Accordingly, relocation planning and housing preferences are expected to evolve progressively following compensation negotiations and during RAP implementation.

The 4 of the 5 households whose permanent residences are affected in Section 2 reported that they do not own second homes and currently lack concrete relocation plans. For these households,

- **Purchasing or renting a new house from the local market** (e.g. Terkirdağ or district centres) is considered the most viable resettlement option within the Project area. Although this option remains subject to market availability, consultations and preliminary assessments indicate that suitable housing options are generally available within the affected settlements and nearby areas.
- Alternatively, **construction of a new house on alternative land may also be considered**; however, this option is dependent on the availability of suitable land parcels and the completion of relevant permitting and approval processes by competent authorities. Any self-constructed replacement houses will be required to comply with acceptable technical, structural, and construction quality standards. In such cases, the SPV may need to engage in or support contractor selection and appointment processes to ensure compliance with applicable standards and timely completion of construction activities.

  Additional support may be required for vulnerable households, including elderly persons, persons with disabilities, women-headed households, and other disadvantaged groups. Such support may include assistance with land allocation and permitting procedures, identification and engagement of qualified contractors, oversight of construction quality, and incorporation of necessary accessibility provisions and inclusive design standards into replacement housing.

As committed in the Entitlement Matrix, following the approval of the RAP by the Lenders and the LESA, the SPV – RAP Implementation Team will start providing proactive support to affected people to help them finalise and execute relocation plans. To enhance communication during the RAP implementation and provide affected communities with accurate and timely information regarding the Project and the relocation timelines, a Stakeholder Engagement Action Plan (SEP) specific to RAP disclosure and engagement has been developed, as presented in Section 10.3.

Action Plan for Selection of Resettlement Sites

1. SPV to prepare Detailed Implementation Schedules for Parcel Subject to Physical Displacement

In **Q3 2026**, the SPV – RAP Implementation Team will start engaging with affected people to prepare a detailed implementation schedule for parcels subject to the relocation of affected houses and businesses in line with the expropriation and construction programme.

2. SPV to facilitate Consultations with the Relevant Authorities regarding the Feasibility of Implementation Plans

Prior to the preparation of house and business-specific Implementation Plans, one of the key activities will be undertaking consultations with the relevant authorities, including KGM, Ministry of Agriculture and Forestry (including provincial and district-level organisations as necessary), and municipalities, to confirm the feasibility and implement ability of the proposed measures. This will be particularly important where construction of new homes at resettlement sites is considered as a primary resettlement option, as such arrangements will be subject to permitting, and approval processes by the relevant authorities (e.g. long-term security of tenure and connection to utility services, particularly for houses planned to be constructed on agricultural lands, should the relevant authorities permit such development).

3. SPV to prepare House and Business-specific Implementation Plans

In line with the expropriation and construction schedules, the SPV – RAP Implementation Team will begin preparing individual implementation plans tailored to the specific characteristics and needs of each affected household and business enterprise:

- House-specific Resettlement Implementation Plans
- Business-specific Resettlement Implementation Plans

These implementation plans will be developed progressively, in line with the linear construction schedule of the Project and will be fully consistent with the principles outlined in this RAP – particularly those in the Entitlements Matrix.

The following important considerations stemming from the Early Consultations and Notification for Land Acquisition Process defined under RAP will be reflected in developing the implementation plans, to ensure sufficient time for identification and preparation of resettlement sites, and ensuring management of resettlement process in accordance with the principles of IFC PSs, as set out in the RAP:

- Affected houses: The SPV will notify the owners and users (formal and informal) of the affected houses **at least 3 months in advance of the start of expropriation**. If expropriation has already been concluded (through Article 8 or Article 27), the SPV will notify the owners and users of the Project schedule, and the owners or users will be granted a 6-months period to vacate the property following the notification.
- Affected businesses: The SPV will notify the business owners **at least 3 months in advance of the start of expropriation.**

For each affected household and business, the plans will identify **resettlement site alternatives** and **provide clear guidance on the relocation process**. Each plan will include simple and concise information tailored to the specific circumstances of the household or business, including actions to be taken and implementation timeline. To facilitate ease of use and enable effective monitoring of implementation progress, the plans are intended to be developed in a tabular format.

4. SPV to execute House and Business-specific Implementation Plans by the SPV

The SPV – RAP Implementation Team will execute the implementation plans. The SPV and EPC construction teams may assign civil engineers and technicians to advise and supervise affected individuals who prefer to construct their own houses. These technical personnel would provide guidance particularly on ensuring earthquake resistance, fire protection, and resilience against other natural hazards such as heavy rainfall and flooding.

The implementation plans and progress on their execution will be documented by the SPV as part of the periodic internal RAP monitoring reports, which will be prepared regularly until the RAP Completion Audit, as outlined in Chapter 13.

10. Stakeholder Engagement and Information Disclosure

10.1. Previous Engagement and Information Disclosure

This section highlights the key engagement and information disclosure activities related to expropriation and resettlement conducted to date. Details of public participation meetings held under the national environmental impact assessment (EIA) process, along with other ESIA-specific engagement and information disclosure activities, are provided in the **stand-alone Project Stakeholder Engagement Plan (SEP)**.

10.1.1. Expropriation Process

The expropriation process conducted by the KGM in accordance with the Expropriation Law of Türkiye includes mechanisms for information disclosure and consultation with people affected by Project-related land acquisition, as summarised below:

- Publication of Accelerated Expropriation Decisions:

In Türkiye, accelerated expropriation decisions are disclosed to affected communities and the broader public through publication in the Official Gazette of Türkiye.

For this Project, the accelerated expropriation decision issued by the Presidency on 12 April 2023 was published in the Official Gazette[109] on **13 April 2023.**

The decision included a general schematic of the Motorway alignment. As a result, the general Project route subject to expropriation became publicly known.

- Information of Owners and Land Users during Asset Inventory and Valuation:

Mukhtars of the affected settlements and the affected communities, including people affected by Project-related land acquisition, are informed about the expropriation and related procedures **during the on-site identification and inventory of assets studies conducted by the appointed valuation contractor.** These engagements serve as a key point of contact for information dissemination and clarification of the Project's land acquisition impacts, particularly regarding the expropriation boundaries.

- Information of Owners through Official (Article 8) Notifications sent by KGM to Owners and Shareholders of Affected Assets

In line with the Expropriation Law, Article 8 notifications are dispatched by the KGM via registered returned mail to all owners and shareholders of the affected assets. This includes the legal heirs of deceased owners.

These official letters contain detailed information on the following:

  - Date, time, and location of negotiation meetings
  - Procedure to be followed in case of agreement (including title deed transfer and payment of the expropriation fee)
  - Legal procedure to be followed by KGM in case of disagreement
  - A list of documents that affected persons must bring to the meetings and tasks they must complete to finalise the negotiation and agreement process. This includes, but is not limited to, documentation on inheritance and succession.

- Information of Owners during in-person Negotiation Meetings held as per Article 8

The in-person negotiation meetings are conducted by KGM's Negotiation Commission at the settlement level, either within the settlement itself or at a nearby venue (such as local directorates of relevant governmental institutions) that is well known and easily accessible to the affected people.

[109] https://www.resmigazete.gov.tr/eskiler/2023/04/20230413-6.pdf

Prior to the start of the negotiations on the meeting day, the Commission provides participants (the owners and shareholders of the affected assets) with the following information:

- General information about the Project and motorway construction works
- The Expropriation Law of Türkiye and the associated expropriation procedures
- How the expropriation value is determined for affected assets (lands, structures, trees, crops), with necessary clarifications and justifications related to valuation
- The rights of individuals whose property will be expropriated
- Expropriation procedures and works carried out up to the date of the meeting (such as field identification works, valuation, etc.), and
- Expropriation procedures to follow after the meeting, in case of agreement and disagreement

Following the general information sessions, in-person engagement and negotiations are conducted. The outcomes of these negotiations – whether agreement or disagreement – are documented by KGM using relevant records, such as purchase agreement protocols signed by the KGM's negotiation commission members and respective owner in case of agreement.

- Informing Relevant Institutions and Legal Entities through Official Correspondence

KGM informs relevant institutions and legal entities through official correspondence about the Project route. This communication also aims to identify any existing or planned infrastructure facilities – such as energy transmission lines, drinking water systems, wastewater and stormwater infrastructure, and natural gas pipelines – that may overlap with the Project and therefore need to be displaced.

Where applicable, KGM also requests consent for activities to be undertaken on parcels under the ownership or control of these entities.

Please refer to Section 2.6.3 for detailed information on this process.

10.1.2. Engagement between the SPV and KGM

The Senior Management of the SPV regularly engages with the General Directorate of KGM and the KÖSOB on various project management aspects, including the land acquisition process, RAP study, alignment with applicable international standards, as well as subjects related to the Project programme, design, permitting, construction, and Project governance.

The SPV maintains close engagement with the KGM's Public – Private Partnership Regional Directorate (KÖSOB – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*), particularly for coordinating ongoing design and construction activities, as well as managing and monitoring the progress of land acquisition and permitting works.

Key engagement activities conducted between KGM, the SPV, and the RAP Consultant – aimed at informing the authority about the RAP study and obtaining their input and as applicable feedback on the RAP documentation and its implementation – are summarised in Table 10-1.

Table 10-1. Key Engagement with KGM as part of RAP Preparation

Date of Engagement	Attending Parties	Location	Purpose of Engagement
9 July 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
14 August 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
11 September 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.

Date of Engagement	Attending Parties	Location	Purpose of Engagement
9 October 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
13 November 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
3 December 2025	KÖSOB SPV – Deputy Technical Director SPV – E&S Manager RAP Consultant	KÖSOB Office in Bursa	○ To obtain information on the status of ongoing expropriation activities along the Kınalı – Malkara section, including valuation methodologies, Article 8 negotiation timelines, and treatment of land users, among others. ○ Present the RPF to KÖSOB, including the scope and objectives of the RPF, the requirements of the applicable international standards – particularly IFC PS5 – the gaps between national legislation and international standards, key compensation and assistance principles committed by the SPV within the RPF, the actions to be taken by the SPV to bridge those gaps and ensure full compliance with international standards and lender requirements, including but not limited to achieving full replacement cost in the compensation of affected assets, as well as the RAP Fund to be provided by the SPV for this purpose. ○ Brief KÖSOB on the RAP studies, including the field surveys and consultations with affected people
11 December 2025	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
8 January 2026	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
25 February 2026	All parties including Ministry of Treasury and Finance KGM – General Directorate Financing Parties SPV RAP Consultant	Ankara	○ Brief and update all parties on the following: - Status of expropriation by KGM - RPF methodology and process - RAP methodology and process including scope of RAP surveys, engagement with affected people and KGM, actions taken to bridge the gaps between the international standards and national legislation - KGM's extensive experience and knowledge on the public private partnership projects financed y IFIs and implemented in accordance with the international - Collaboration with KÖSOB during preparation of RPF and RAP, including expropriation and valuation data obtained from KÖSOB to date - KGM's commitment to ongoing cooperation with the SPV, including provision of the necessary land acquisition data for RAP preparation, as well as continued support for RAP implementation throughout the Project lifecycle.
5 March 2026	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.
9 April 2026	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.

Date of Engagement	Attending Parties	Location	Purpose of Engagement
29 April 2026	KÖSOB SPV – E&S Manager EPC – Expropriation Manager	KÖSOB Office in Bursa	○ Provision of Section 1 and Section 2 (KM 58 – 60) valuation data required for RAP preparation, including structure valuation forms, list of affected trees, KGM's expropriation budget ○ Collaborative actions to be taken by the KÖSOB and the SPV/EPC for the relocation of business in Section 2
5 May 2026	KÖSOB EPC	KÖSOB Office in Bursa	○ To discuss project progress and conduct a consultation meeting with relevant stakeholders.

10.1.3. Project-specific Actions taken by SPV to date

- Community Liaison Officers (CLOs) employed in the Project:

The SPV has employed **two** CLOs. These CLOs have been and will maintain ongoing engagement with the mukhtars and affected people in affected settlements.

- Grievance boxes and forms:

The SPV – CLOs have collaborated with the mukhtars and placed the grievance boxes and forms in the affected settlements.

10.1.4. RFP Disclosure

Following the signing of the Finance Agreement in April 2026, the SPV's Resettlement Specialist and the CLOs began individually engaging with PAPs, including owners and users of residential and non-residential structures, as well as affected businesses, in line with the Project's construction and expropriation programmes, and informing people about the RAP entitlements. Records of the engagement activities carried out to date are maintained by the SPV in the Project's Stakeholder Engagement Log, which is updated regularly.

The Resettlement Policy Framework (RPF), prepared by GEM and finalised following the review and approval of the Project's Lenders and the Lenders' Environmental and Social Advisor (LESA) on 16 December 2025, is disclosed by the SPV on the Project website in Turkish and English, through the following links:

- https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-kinali-malkara-otoyolu-yeniden-yerlesim-politikasi-cercevesi.pdf
- https://www.1915canakkale.com/cmsfiles/Galleries/18348/cok-kinali-malkara-motorway-resettlement-policy-framework.pdf

10.1.5. RAP Preparation

The RAP Consultant Team has conducted a series of meetings and surveys to support the RAP preparation process. These engagements were designed to gather essential data directly from the affected people and to incorporate their feedback into the RAP through participatory consultation:

- A **resettlement scoping field visit** was carried out by the RAP Consultant Team, during which consultations were held with the KÖSOB in Bursa, the District Agricultural Directorates of Silivri, Çorlu and Malkara, as well as settlement heads and affected persons – including those with houses and agricultural lands– in the identified settlements. During the visit, the settlement heads and affected persons were informed about the key steps of the expropriation process. They were also briefed on the upcoming RAP surveys, as well as future engagement and information dissemination activities to be carried out by KGM and the SPV. List of the engagement carried out in this scope is presented in Section 5.1.2.2.
- A comprehensive **RAP survey programme** was implemented as part of the RAP in November 2025 and March 2026. As part of these efforts, pre-designed structured questionnaires were administered to settlement heads and affected individuals, including owners and both formal and informal users of impacted agricultural lands, houses and special-use structures. The surveys established baseline conditions, as detailed in Section 5.2, and gathered critical information to inform the RAP – particularly

regarding resettlement needs and livelihood restoration assistance and planning, which are integrated throughout the document.

The people affected by the Project's land acquisition impacts began to be informed about the RAP, compensation principles and entitlement framework, initially during the RAP surveys held in November 2025 and February – April 2026.

10.1.6. ESIA Disclosure and Public Participation Meetings

In line with the international standards and the Lenders' E&S risk classification approaches, the Project has been classified as a "Category A" activity. Accordingly, separate from the RPF and this RAP, an Environmental and Social Impact Assessment (ESIA) Package has been prepared by the ESIA Consultant.

The ESIA package comprises the following components:

- ESIA Report (March 2025)
- Non-Technical Summary (NTS) (March 2025)
- Stakeholder Engagement Plan (SEP) (March 2025)
- Environmental and Social Management Plan (ESMP) (November 2025)
- Biodiversity Action Plan (BAP) Framework (November 2025)
- ESIA Brochure
- Expropriation Information Guide
- Severance Management Plan (SEVMP)

The required components of the ESIA Package **were disclosed in both Turkish and English on the Project website**[110].

ESIA Public Disclosure and Consultation Meetings in affected Settlements

As outlined in the updated SEP (March 2026), **ESIA Public Disclosure and Consultation** were held by the SPV in **February 2026**, during which stakeholders were informed about the Project, its potential environmental and social impacts and risks, proposed mitigation measures, and the implementation, monitoring, and reporting responsibilities of various parties.

During the meetings, an Expropriation Information Guide, including information on the RAP and approved by KGM – KÖSOB, was distributed to the affected people who participated in the meetings held in February 2026. This Guide was also published[111] on the Project's website in January 2026, in Turkish and English.

In total, **five meetings** were held in the districts of Silivri, Çorlu, Marmaraereğlisi, Süleymanpaşa, and Malkara. Representatives from the ESIA Consultant, as well as officials from KGM, attended the meetings.

Details on these meetings, including the public announcements, invitations sent to stakeholders, participation levels, photographs, and minutes of meetings, are presented in the updated SEP (March 2026).

- Project and expropriation timelines
- Expropriation procedures, negotiation process, and legal steps
- Requests for detailed maps and parcel-specific information
- Impacts on residential properties
- Impacts on agricultural income and productivity (economic displacement)
- Expropriation compensation and valuation criteria and process details

[110] https://www.1915canakkale.com/en-us/sustainability/kinali-malkara-section/environmental-and-social-impact-assessment; https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi.

[111] Turkish: https://www.1915canakkale.com/cmsfiles/Galleries/18348/COK-Kinali-Malkara-Otoyolu-Kamulastirma-Bilgi-Rehberi.pdf?v=2; English: https://www.1915canakkale.com/cmsfiles/Galleries/18348/COK-Kinali-Malkara-Motorway-Expropriation-Information-Guide.pdf?v=2

- Expectations for compensation at market value
- Compensation for houses, structures, trees and crops, mortgaged properties and jointly owned parcels
- Compensation for crop losses during construction
- Inflation risks and potential financial loss during court processes
- Partial acquisition, orphan lands and remaining land that may become economically or physically unusable
- Access to agricultural lands after expropriation and access restriction risks
- Adequacy, location, and frequency of underpasses and overpasses
- Requests for land-for-land compensation or exchange with equivalent land
- Alternative compensation mechanisms beyond cash payments
- Relocation timelines and conditions for vacating properties
- Issues related to inheritance and incomplete title deed processes, legal representation, power of attorney, and court procedures
- Requests for support in cases involving vulnerable individuals such as disabled individuals unable to attend meetings, complex ownership structures, and unresolved past expropriation issues
- Requests for transparent, timely, and inclusive engagement processes through ongoing information sharing based on clearer communication channels

10.2. Guide to Land Acquisition and Compensation (GLAC)

A GLAC, providing a concise, clear, and non-technical summary of the RAP, has been be prepared by the SPV following the completion of draft RAP in Q2 2026.

Once finalised and approved by the Lenders and the LESA, the **GLAC will be distributed to the mukhtars and affected people** in affected communities to enhance their understanding of the process and to support effective RAP implementation. The distribution of the approved version to the settlement heads and PAPs is anticipated to commence in Q3 2026.

10.3. RAP Disclosure and Engagement Action Plan

Following finalisation and final approval by Lenders, **this RAP and GLAC, will also be disclosed on the Project website** in accordance with Lenders' respective disclosure policies.

This disclosure will aim to inform stakeholders about the Project's activities, impact assessment findings, planned mitigation and monitoring measures, and to gather public feedback on the Project and associated documentation.

The **hardcopies** (in Turkish) of the final RAP and GLAC will be made available at the following locations:

- Project's Construction Camp Sites
- Offices of the settlement heads (mukhtars)

Any feedback received from the stakeholders will be reviewed by the SPV and the RAP Consultant and, where appropriate, incorporated into the RAP implementation.

A **RAP Disclosure and Engagement Action Plan**, outlining specific stakeholder engagement activities to be conducted by the SPV, with KGM, KÖSOB, mukhtars, affected people, and other external stakeholders as necessary, during the **RAP disclosure and implementation phases**– has been prepared as part of this RAP, as presented in Table 10-2.

This plan will be **updated** as necessary throughout the RAP implementation phase.

Specifically for the disclosure of the RAP, the RAP Implementation Team will organise separate group and/or individual meetings and information sessions following finalisation and final approval of the relevant documentation by the Lenders.

The SPV CLOs will engage individually with affected households including **vulnerable members** to distribute the GLAC and communicate the key information from the RAP, as applicable.

Questions, feedback, and suggestions related to the RAP, received from affected people and other interested stakeholders, will be recorded by the SPV CLOs in a dedicated RAP database. Where necessary, follow-up actions will be undertaken by the RAP Implementation Team.

Table 10-2. RAP Disclosure and Engagement Plan

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation	During RAP Implementation
MoTI – General Directorate of Highways (KGM)	• To exchange information and build understanding and consensus on the RAP implementation • To establish implementation responsibilities and coordination mechanism related to RAP implementation	• RAP (in Turkish) • GLAC (in Turkish) • Presentation of the key RAP findings (in the format to be requested by the authority)	• Through digital copies published on Project website (https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Through hard copies (in the format requested by the authority) • Official correspondence • Face-to-face meetings	• KGM (Ankara) • SPV offices • Project site offices	• Corporate Senior Management • SPV – Deputy Technical Director • SPV – E&S Manager	**Multiple times** prior to RAP finalisation as necessary **(done)**	**Quarterly** (minimum)
KÖSOB				• KÖSOB • Project site offices	• Corporate Senior Management • SPV – Deputy Technical Director • SPV – E&S Manager • EPC – Expropriation Manager		**Weekly** (minimum)
Settlement Heads (Mukhtars)	• To inform affected people through the settlement heads about the Project, construction schedule, expropriation process, land entry processes, the RAP study, and the Project grievance mechanism • To ensure timely evacuation of expropriated parcels and implementation of the Project as per the planned schedule	• RAP (in Turkish) • GLAC (in Turkish) • Expropriation lists • Technical Project information (such as route drawings, design and locations of engineering structures, etc.)	• Through digital copies published on Project website (https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face meetings • Phone calls and messaging applications	• Project site offices • Offices of the settlement heads or other mutually agreed locations in affected settlements	• SPV – E&S Manager • EPC – Expropriation Manager • SPV – Resettlement Specialist • SPV – CLOs	**At least one** meeting during RAP preparation and/or one meeting before KGM dispatches Article 8 notifications **(done)**	**Monthly**
Households affected by physical displacement	• To inform affected people about the Project, construction schedule, expropriation process, land entry processes, the RAP	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and	• Through digital copies published on Project website (https://www.1915canakkale.com/en-us/sustainability/kinali-malkara-section/environmental-and-social-impact-assessment)	• Affected house plot or mutually agreed locations in affected settlements	• SPV – E&S Manager • EPC – Expropriation Manager	**At least one** meeting during RAP preparation **(done)** and/or one meeting before KGM	**Weekly** during and until completion of relocation (commencing from Article 8 notifications)

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation	During RAP Implementation
	study, and the Project grievance mechanism	support measures provided to physically displaced households	• Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings Phone calls and messaging applications		• SPV – Resettlement Specialist • SPV – CLOs	dispatches Article 8 notifications	and **quarterly** after relocation until they are successfully resettled
Households affected by economic displacement	• To inform affected people about the Project, construction schedule, expropriation process, land entry processes, the RAP study, and the Project grievance mechanism	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to economically displaced households	• Through digital copies published on Project website (https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings • Phone calls and messaging applications	• Project site offices • Offices of the settlement heads or other mutually agreed locations in affected settlements	• SPV – E&S Manager • EPC – Expropriation Manager • SPV – Resettlement Specialist • SPV – CLOs	**At least one** meeting meeting before KGM dispatches Article 8 notifications **(done as part of ESIA disclosure meetings)**	**Monthly** during implementation of the livelihood restoration programme, **annually** afterwards
Vulnerable members of the affected households	• To ensure the information of and engagement with vulnerable people and women regarding the Project, construction schedule, expropriation process land entry processes, the RAP study, and the Project grievance mechanism	• GLAC (in Turkish) • Presentation of the key RAP findings, specifically entitlements and support measures provided to affected households with vulnerable members • Other specially designed materials addressing the particular needs of the affected people	• Face-to-face individual meetings • Phone calls and messaging applications	• Residences of vulnerable households or mutually agreed locations in affected settlements	• SPV – E&S Manager • EPC – Expropriation Manager • SPV – Resettlement Specialist • SPV – CLOs	**Where possible, at least one** meeting during disclosure and/or one meeting before KGM dispatches Article 8 notifications	**Monthly** during implementation of support measures, **semi-annually** afterwards
Affected businesses	• To inform affected businesses	• GLAC (in Turkish)	• Through digital copies published on Project website	• Affected business structures or other	• SPV – E&S Manager	**At least one** meeting	**Weekly** during and until

Stakeholder	Purpose of Engagement	Documents/ Materials to be Used for Engagement	Engagement Method	Location (for physical engagement)	Responsible Party	Timetable for Implementation	
						During RAP Preparation	During RAP Implementation
(if any)	(business owners and direct/contracted employees) about the Project, construction schedule, land entry processes, the RAP study, and the Project grievance mechanism	• Presentation of the key RAP findings, specifically entitlements and support measures provided to affected businesses and their employees	(https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Through hard copies distributed to the offices of the settlement heads and other public places, as appropriate • Face-to-face individual or group meetings Phone calls and messaging applications	mutually agreed locations	• EPC – Expropriation Manager • SPV – Resettlement Specialist • SPV – CLOs	during RAP preparation **(done)** and/or one meeting before KGM dispatches Article 8 notifications	completion of relocation (commencing from Article 8 notifications) **Monthly** after relocation until they are successfully resettled **Annually** for businesses (with affected lands and assets) **that will not relocate**
Lenders	• To inform and update the Lenders about the RAP	• Annual reporting to Lenders • Periodic E&S Monitoring Reports during construction and operation • Periodic Internal RAP Monitoring Reports	• Through digital copies published on Project website (https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Reporting • E-mail correspondence • Phone calls • Face to face meetings	• Project website (https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi) • Project site offices Other venues to be agreed upon	• Corporate Senior Management • SPV – Deputy Technical Director • SPV – E&S Manager	**On demand**	**Quarterly** monitoring site visits during construction (by Lenders or their LESA) Periodic monitoring site visits during operation (by Lenders or their LESA)

11. Grievance Management Mechanisms

The Stakeholder Engagement Plan (SEP) for the Project, including the public grievance mechanism, has been developed as part of the ESIA Package, in accordance with international requirements. Consistent with this Project-specific grievance mechanism defined under the SEP, procedures will be established and implemented for managing **grievances specifically resulting from land acquisition, resettlement, and livelihood restoration** during the RAP preparation and implementation phases.

This Chapter focuses on the Project-specific grievance mechanism established for managing **grievances specifically resulting from land acquisition, resettlement, and livelihood restoration,** through the following components:

- Project-specific grievance mechanisms
- Collaboration with KGM for the management of land acquisition-related grievances
- Collaboration with the EPC Contractor for the management of construction-related grievances
- Appeals mechanisms

KGM, as the designated authority for expropriation, collects and manages grievances, objections, and feedback (e.g., requests, suggestions) related to land acquisition. If such land acquisition-related grievances or feedback are collected or received by the SPV through the implementation of the Project SEP, the SPV will convey them to KGM in writing. Furthermore, the SPV will consolidate all land acquisition-related complaints – collected by the SPV, the EPC Contractor (including subcontractors), KGM, and other relevant authorities – into a master complaints tracker.

Land-acquisition related grievances and feedback of public that require action by the SPV will be handled by the SPV in accordance with the Project-specific grievance mechanism described in Section 11.1. This mechanism is accessible to affected parties, including communities, owners, and formal and informal users of the affected lands and other assets, and/or people whose livelihoods may be affected by the Project.

The SPV will collaborate with the EPC Contractor for the collection, registration, and management/resolution of construction-related grievances (e.g., damages to crops and other assets, spillages onto neighbouring parcels), as described in Section 11.3.

For the management of employee grievances in the Project, the Project has a a Worker Grievance Mechanism Procedure, which is followed by both the SPV and the EPC teams.

11.1. Project-specific Grievance Mechanism

The Project-specific Grievance Mechanism is defined under Project's SEP. Key principles for addressing grievances resulting from land acquisition, resettlement, and livelihood restoration – aligned with IFC PS5 – will be as follows:

- designed to specifically address grievances resulting from land acquisition, resettlement, and livelihood restoration;
- use culturally appropriate methods taking into account specific cultural and traditional mechanisms for raising and resolving grievances;
- scaled to the risks and adverse impacts of the Project and have communities and people affected by Project-related land acquisition as its primary user and stage of the Project and land-acquisition process;
- accessible with clear communication and ease of use for all affected people including vulnerable individuals;
- seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern;
- does not impede access to judicial or administrative remedies.

The SPV will inform the settlement heads and affected people in settlements affected by the Project-related land acquisition about the mechanisms available to them as well as the contact details of the Project.

Grievances raised by external government agencies, legal entities or other institutional stakeholders – will also be addressed through this mechanism.

During implementation of the mechanism, the SPV will:

- ensure that all complaints are taken seriously and treated fairly;
- encourage use of the GM and provide assurance that there will be no retribution for participation;
- ensure protection of the identity of complainants
- communicate the rights of stakeholders to use remedies such as external mechanisms, third parties, or the judicial system.
- In the case of allegations of gender-based violence, sexual exploitation, and abuse, the SPV will ensure all allegations are treated ethically by trained members of the Ethics Committee and in line with a survivor-centred approach.

Grievance Committee for Managing Land Acquisition and Resettlement related Grievances

A Project-level Grievance Committee, consisting of the following members and acting as a redress group, will be set-up for effective implementation of the Project-specific Grievance Mechanism and monitoring of actions:

- SPV – E&S Manager
- SPV – Resettlement Specialist
- SPV – CLOs
- EPC – Expropriation Manager
- EPC – E&S Manager

The **SPV – Deputy Technical Director** will oversee the implementation of the mechanism at the SPV and EPC Contractor levels. The E&S Manager of the SPV, with support from the EPC's Expropriation Manager, will hold overall responsibility for ensuring the effective implementation of the grievance mechanism for managing land acquisition-related grievances of affected people as part of RAP implementation. The EPC's Expropriation Manager will ensure effective coordination and collaboration with KÖSOB for the management of land acquisition-related grievances and concerns. The day-to-day implementation of the mechanism will be carried out by the SPV's CLOs, with support from the EPC – E&S Manager. The Resettlement Specialist of the SPV will also provide support for the management and resolution of grievances related to livelihood risks and impacts on agricultural land users.

The Project has in place a **Gender-based Violence and Harassment Management (GBVH) Plan** prepared by the SPV. The management of gender-related issues associated with land acquisition grievances will be led by the female CLOs (focal points) of the SPV, under the supervision of SPV's E&S Manager. Relevant employees playing an active role in GBVH management will receive specialised GBVH training to address associated issues and concerns[112]. In the case of allegations of gender-based violence, sexual exploitation, and abuse, the SPV will ensure all allegations are treated ethically by trained members of the Ethics Committee.

During the land-acquisition and construction phases – when the land acquisition related grievances are anticipated to be most frequent – the Grievance Committee will convene **monthly**, either physically or remotely, to review pending grievances, assess the responses provided to stakeholders, and evaluate the effectiveness of actions taken to resolve key issues, with the aim of addressing non-judicial disputes arising from various Project-related matters.

Grievance Database (including land acquisition and RAP-related complaints and feedback)

The SPV has established a **dedicated Project Grievance Database (Log)** that incorporates all land acquisition and RAP-related complaints – whether received by the SPV, the EPC Contractor (including subcontractors), KGM, or other relevant authorities – into a master complaints tracker. The database allows categorisation of complaints and feedback according to their subjects, thereby enabling the filtering of land acquisition, RAP and LRP related complaints and feedback.

[112]Such as allegations of gender-based violence, sexual exploitation, and abuse associated with the land acquisition and compensation process.

Any grievance or feedback – whether verbal or written – submitted through these various channels will be recorded by the SPV's RAP Implementation Team – with support from EPC teams – in this dedicated database.

For this purpose, the SPV will collaborate with KÖSOB on a **monthly basis** as part of periodic Project coordination meetings, collect the grievances received by KGM and KÖSOB regarding the Project's land acquisition process, and incorporate the information into the Project's Grievance Database. Mechanisms for management of grievances collected by KGM that require action by KGM or SPV will be outlined in the RAP, as indicated in Section 11.2.

Personal Data Protection

The data recorded and processed in the Project's Grievance Database will be managed in compliance with the requirements of the Law on the Protection of Personal Data (Law No. 6698, 2016).

The mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

Grievance and Feedback Collection Channels

The grievance and feedback collection channels to be used will aligned with the Project SEP, as summarised in Table 11-1.

The public will be informed about these channels through announcements posted on information boards to be placed in mukhtars' offices, and/or other public areas, as appropriate.

Table 11-1. Channels for Collecting Complaints and Feedback

Channel	Explanation
Project website	Project website: https://www.1915canakkale.com/surdurulebilirlik/kinali-malkara-kesimi/cevresel-ve-sosyal-etki-degerlendirmesi
E-mail	info@1915canakkale.com
Mail or In-person Application	Main Office: Metropol İstanbul Sitesi, A Blok, Daire 14, Ataşehir, İstanbul Site Office: Main Construction Camp Site (KM 60+000)
Project Hotline	0850 399 1915 (Direct connection to the E&S Department)
CLOs	CLOs will be the primary focal points for collecting and registering grievances and feedback – whether verbal or written – received during public and individual meetings, as well as via phone calls, emails, correspondence, etc. CLOs will ensure responses are provided to the grievance/feedback holders within the defined timeframes. Where necessary, CLOs will assist stakeholders in completing grievance and feedback forms.
Phone – CLOs	+90 536 625 20 93 +90 536 625 20 70
Grievance boxes and forms	Grievance and feedback boxes, along with corresponding grievance forms (as included in the Project SEP), will be installed and regularly maintained by the SPV – CLOs in all affected settlements and at relevant project work sites. These will be located at one or more of the following locations, as appropriate: - Project construction camp sites - Project temporary facility sites - Mukhtar offices - Other public places, as appropriate Grievance and feedback forms will also be available on mobile Project vehicles. This includes vehicles of SPV – CLOs and social staff, HSE staff, and other community-facing managers and directors working at Project sites.
Social media platforms	TBD
Other community-facing Project representatives – including directors, managers, and personnel of the EPC Contractor and its subcontractors	SPV – CLOs will establish systematic procedures and maintain daily engagement with relevant subcontractors to ensure that all grievances and feedback – whether verbal or written – collected by subcontractor personnel are promptly conveyed to the appropriate SPV and EPC representatives. These grievances and feedback items will be recorded by the SPV – CLOs in the **Project's Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.

Channel	Explanation
	SPV – CLOs will provide training to other community-facing representatives of the Project, including directors and managers from both the SPV, EPC and subcontractors, to ensure consistent and effective implementation of the Project Grievance Mechanism.
Personal visits by stakeholders to the Project sites – such as construction camp sites, temporary facility sites, etc.	The SPV – CLOs will assist visitors to the Project construction camp and other temporary work sites in completing grievance and feedback forms, whenever possible. If verbal feedback and/or grievances are received during stakeholder visits, the SPV and SPV CLOs – whichever party receives them – will ensure these are duly recorded and addressed in accordance with the Project Grievance Mechanism.
Through Directorate General of Highways (KGM) in Ankara	**Stakeholders may submit grievances and feedback regarding the Project directly to KGM through KGM's online grievance system:** https://vatandas.kgm.gov.tr/Complaint/Personal?_gl=1*1o6xoq*_ga*MTA4MjcyMTY2My4xNzQ3NjMzNDMz*_ga_P1MD63L4M4*czE3NDgwNzk5NDMkbzMkZzAkdDE3NDgwNzk5NDMkajYwJGwwJGgxMDc2NjUzOTcxJGRVQnBtMnZCVDFEd0FHQ1pWY3ViRWInRUZOY3llV19JOHRB KGM will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV. These grievances and feedback items will be recorded by the SPV – CLOs in the **Project's Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
Through KÖSOB	Stakeholders may submit grievances and feedback regarding the Project directly to KGM's **KÖSOB**: Mail or in-person application: Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Armutköy Mah. Nil Cad. No:22, 16180 Osmangazi, Bursa, Türkiye Phone: +90224 - 275 78 00 (50 Hat) +90 286 502 00 12 Fax: +90 224 – 267 09 45 E-mail:kosob@kgm.gov.tr KÖSOB will refer any issues that require action by the SPV or the EPC contractor or subcontractors to the SPV. These grievances and feedback items will be recorded by the SPV – CLOs in the **Project's Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
The Presidency's Communications Centre (CIMER)	**The Presidency's Communication Centre (CIMER)** provides a centralized complaint system accessible to Turkish citizens, legal entities, and foreigners. It will serve as an alternative and widely recognised channel through which Project stakeholders can submit Project-related grievances and feedback directly to state authorities. **CIMER Contact Information:** Website: https://www.cimer.gov.tr/ Call Centre: 150 Phone: +90 312 525 55 55 Fax: +90 312 473 64 94 Mail: Addressed to the Republic of Türkiye, Directorate of Communications In-person applications: At community relations desks located in governorates, ministries, and district governorates Grievances and feedback received by KGM or the Project through CIMER will be recorded by the SPV – CLOs in the **Project's Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.
The Presidency's Communications Centre (YİMER)	**The Foreigners Communication Centre (YİMER)** provides a centralised information and complaint system primarily for foreign nationals residing in Türkiye. It will serve as an alternative and well-recognised channel through which foreign resident Project stakeholders can submit Project-related grievances and feedback directly to state authorities. **YİMER Contact Information:** Website: https://yimer.gov.tr Call Centre: 157 (available 24/7 and supports multiple languages) Phone: +90 312 157 11 22 E-mail: info@yimer.gov.tr Grievances and feedback received by KGM or the Project through YİMER will be recorded by the SPV – CLOs in the **Project's Grievance Database** and managed in accordance with the Project-specific Grievance Mechanism for the RAP.

The key steps of the grievance mechanism for external stakeholders are given in the Project SEP and summarised in Table 11-2.

The grievance mechanism will recognise the right of stakeholders and complainants to request the deletion of their personal data from any records or grievances, etc. Personal data and records will be protected and kept secure and used only for the purpose of grievance resolution or analysis. No personal data will be disclosed or reported publicly.

Table 11-2. Key Steps of the Grievance Mechanism for Land-acquisition related Grievances

Key Steps	Description of the Activities/Tasks
Step 1 – Receive and register	• Grievances and feedback from external stakeholders are collected through the communication channels listed in Table 11-1. • Each grievance is recorded **within five (5) days** and classified by the designated SPV – CLOs in the Project's Grievance Database, maintained in both written and electronic formats specifically for external stakeholder grievances, in accordance with Project's personal data protection policies. • The stakeholder requests for the deletion of their personal data from any records or grievances, etc. will be addressed.
Step 2 – Acknowledge	• Grievance is formally acknowledged through a personal meeting, phone call, or letter, as appropriate, by the Project. • If the grievance is not clearly understood, or if additional information is required, clarification will be sought by the SPV – CLOs from the complainant during this step
Step 3 – Delegate	• The designated SPV – CLOs delegates the grievance in writing to the relevant Project department, EPC Contractor, or designated personnel for the preparation of an appropriate response. • The SPV – CLOs will assess the subject matter and determine the risk category of the grievance and the timeframe for completion of relevant actions. If necessary, the grievance may be escalated to Project or Corporate Senior Management for consideration. • A response is developed by the SPV – CLOs or the relevant team associated with the grievance, with input other corporate or Project teams, and third parties, as needed. • At the request of the designated SPV – CLOs with approval from the SPV – E&S Manager, the Grievance Committee may be involved depending on the complexity of the grievance or when expert opinion on specific matters is required. • Required actions are implemented by the designated Project personnel or teams to address the issue, and their completion is documented in the Project's Grievance Database. • The response is then signed off by the SPV – CLOs. This sign-off may consist of either a signature in the database or any written correspondence (through petition, e-mail or message) with the complainant, which will be filed together with the grievance to confirm agreement.
Step 4 – Respond	• The response is communicated by the SPV – CLOs to the affected party **within thirty (30) working days of receipt by the Project.** • The designated SPV – CLOs ensures that an appropriate method for communicating the response is agreed upon and implemented, following approval from Project Senior Management or the Grievance Committee, as applicable. • The complainant's response to the resolution is documented to determine whether the grievance can be closed or if further action is necessary. The designated SPV – CLOs will use appropriate communication channels – most likely a telephone call, through messaging or face-to-face meeting – to confirm that the complainant has understood and is satisfied with the response. • The complainant's response is recorded in the Project's Grievance Database, and ideally, both parties will sign off to confirm closure of the grievance.
Step 5 – Close	• The grievance is closed with sign-off by the designated SPV – CLOs, who determines whether the matter has been adequately resolved or if further attention and action are required. • If additional action is needed, the designated CLO will reassess the grievance and take appropriate steps. Once the CLO confirms that the grievance can be closed, he/she will sign off to formally approve closure – either in the Project's Grievance Database and/or through written communication. • A **Grievance Close-Out Form** (as included in the Project SEP), signed by the designated CLO and including relevant attachments, will be provided to the complainant as proof that the grievance was properly addressed and resolved. Where appropriate, the signature of the complainant will also be requested on the Close-Out Form. • If the actions taken are not satisfactory to the complainant, the SPV, in consultation with the Lenders, will consider and, if necessary, initiate a second-tier grievance management (Appeals Mechanism), as outlined in Section 11.4.

11.2. Collaboration with KGM for Land Acquisition Related Grievances

Potential grievances and feedback from communities related to land acquisition may include the following:

- Disagreement on inventory prepared by KGM
- Disagreement with compensation rates offered by KGM's Negotiation Commission in accordance with Article 8[113] of the Expropriation Law (such cases of disagreement will be managed through court proceedings direct Article 10 or Article 27 following Article 10 court)
- Disagreement on resettlement package provided by the SPV (to be conveyed to the SPV)
- Physical displacement impacts and resettlement sites and request for avoidance or minimisation measures
- Economic displacement impacts and request for avoidance or minimisation measures
- Issues related to orphan or fragmented lands and request for expropriation of entire parcel
- Damage to crops during surveys and works
- Allegations of gender-based violence, sexual exploitation, and abuse associated with the land acquisition and compensation process

Management of grievances collected by KGM – KÖSOB that require action by SPV

Grievances and feedback from affected people – such as requests related to design (e.g. additional crossings, relocation or modification of crossings, or requests for expropriation of orphan lands) – are collected by KGM – KÖSOB either through written petitions or verbal communication. KGM is responsible for evaluating and managing these submissions.

Requests that require action by the SPV, such as those necessitating consideration during design or construction phases or compensation of damages caused by construction, are formally communicated by KGM – KÖSOB to the SPV in writing. The SPV – CLOs will record these in the Project's Grievance Database and manage in accordance with the Project-specific Grievance Mechanism for the RAP. KGM – KÖSOB also follows up to monitor and confirm that the SPV has implemented the requested actions.

Management of grievances collected by SPV that require action by KGM – KÖSOB

Should land acquisition-related grievances or feedback from affected people be received by the SPV through the established grievance mechanism, the SPV will formally convey these to KGM – KÖSOB in writing. The handling of such grievances will then follow the procedure summarized in Table 11-3.

Table 11-3. Management of Grievances Collected by SPV

No.	Action	Timeframe
1.	The SPV shall register all land acquisition-related grievances and feedback received from affected people in the **Project's Grievance Database** and formally convey these to KGM – KÖSOB in writing.	Within **3 days** of receiving the grievance.
2.	The SPV shall initiate and/or coordinate follow-up meetings with KGM – KÖSOB, as necessary, to support the effective management of land acquisition-related grievances and feedback.	If deemed necessary based on the nature and urgency of the grievance, the SPV will request a meeting with KGM – KÖSOB within **7 days** of receiving the grievance. The meeting will take place upon KGM – KÖSOB's agreement.
3.	Where relevant and appropriate – and with KGM – KÖSOB's approval – the SPV shall collaborate with KGM – KÖSOB in addressing land acquisition-related grievances and feedback. This may involve implementing measures aligned with the Project SEP and Grievance Mechanism, including adjustments in design, construction practices, or organisational arrangements.	To be determined on a case-by-case basis in coordination with KGM – KÖSOB.
4.	The SPV shall include a summary of all land acquisition-related grievances and feedback in the periodic Project progress reports submitted to KGM.	**Monthly** throughout the construction phase; frequency for the operation phase to be determined by KGM – KÖSOB, if applicable.

[113] In the case of an Article 27 process, the Land Seizure Value determined by the court is subject to review by the court experts, and the final Expropriation Value is subsequently established by the courts through the Article 10 procedure. This procedure is initiated by the KGM and carried out by the courts as an integral part of the Article 27 process, without requiring any request or application from affected people. The difference between the Land Seizure Value and the Expropriation Value is settled by KGM in accordance with the court's decision.

11.3. Collaboration with EPC Contractor for Construction Related Grievances

The EPC Contractor will be contractually obliged to report to the SPV all grievances and feedback received in connection with construction activities. These may include issues such as:

- Damage to properties and crops
- Damage to local road
- Disruptions during displacement of existing infrastructure
- Dust, noise, and vibration
- Access restrictions
- Impact on water resources (such as water used for irrigation)

While the EPC Contractor will retain primary responsibility for managing and resolving such grievances, the SPV will carry out **monthly** reviews to ensure that the EPC Contractor's grievance management is consistent with the overarching Project Grievance Mechanism.

With respect to land acquisition processes and the livelihoods of affected people, any construction-related grievances or requests received by the SPV – either through the Project-specific Grievance Mechanism or identified by site teams – will be addressed through appropriate measures. These include, but are not limited to:

- Compensation for damages to lands, crops and other assets
- As needed, execution of appropriate consent protocols in alignment with the RAP principles
- Implementation of technical measures to avoid or minimise land acquisition and resettlement impacts
- Management of impacts associated with infrastructure displacement
- Ongoing monitoring of the situation and engagement with the affected people

11.4. Appeals Mechanism

If a grievance is not resolved to the satisfaction of the complainant, the SPV – in consultation with the Lenders – will consider initiating a second-tier grievance management and appeal mechanism. The purpose of this mechanism will be to:

- Re-examine the responses provided to external stakeholders
- Attempt to resolve non-judicial disputes related to various Project matters
- Facilitate the resolution of grievances to the satisfaction of all parties involved

A **Project-level Appeal Committee** will be established in cases where initial grievance resolution efforts are deemed unsatisfactory by the complainant. The Appeal Committee will work in coordination with the Project-level Grievance Committee.

For grievances specifically related to land acquisition and resettlement, the Appeal Committee may include – beyond the core members of the Grievance Committee (as defined in Section 11.1) – additional independent parties such as:

- Certified valuation experts
- Academicians with expertise in the relevant grievance subject
- Independent subject matter experts (such as agricultural experts, livestock experts, etc.)
- Independent legal counsels
- Independent technical experts from professional chambers, reliable private sector parties or non-governmental organisations
- Representatives from local administrations (such as technical staff from KGM – KÖSOB, experts from district directorates of agriculture and forestry, heads of affected settlements), where their involvement is appropriate for both the Project and the affected communities

These individuals may be engaged on a case-by-case basis depending on the type and nature of the grievance and will act as independent mediators when appropriate to ensure that grievances are reviewed and resolved with the appropriate technical and institutional insight. Their inclusion aims to strengthen the impartiality and effectiveness of the appeal process.

The SPV will implement the actions recommended by the Project-level Appeal Committee, in line with its commitment to transparent and responsive grievance management.

However, the existence of the appeal mechanism will not limit stakeholders' rights to pursue external remedies, including judicial or administrative actions, in accordance with the applicable laws and regulations of Türkiye.

In cases that require legal investigation or the involvement of other relevant authorities, the decision to engage the corporate legal team will be made by the SPV – Senior Management.

12. Vulnerable People

12.1. Project-affected Households

The RAP surveys were designed to identify and assess the vulnerabilities of individuals within households or affected business that are physically and economically displaced. The objective was to provide input for both resettlement planning and overall Project design.

Vulnerability Criteria relevant to the Project

The vulnerability criteria determined for the Project, in alignment with IFC PS1, is detailed in Table 12-1. These criteria guided the design of the RAP surveys conducted in February and March 2026. During the administration of household livelihood and physical displacement questionnaires, specific vulnerabilities of household members were identified based on each defined criterion.

Based on the survey results, the relevance of each vulnerability criterion to the Project was reviewed and assessed. A summary of these findings is presented in Table 12-1. It is important to note that several individuals experience multiple vulnerabilities – for example, an elderly person with both a physical disability and a chronic illness. As a result, the same individual may be counted under more than one criterion in Table 12-1.

Table 12-1. Vulnerability Criteria Relevant to the Project for Economically and Physically Displaced Households within RAP Survey Sample

Criterion	Specific Vulnerabilities	Relevance of Vulnerability Criteria to People Affected by Land Acquisition		Count of Individuals within Households with Respective Specific Vulnerabilities	
		Relevant	Not relevant	Physically displaced HHs	Economically displaced HHs
Sex, gender	• Female head of household	X		2 female	5 female
	• Single man taking care of children	X		0	2 male
Children	• Children with special needs		X	0	0
	• Children of school age who do not attend school		X	0	0
Age	• Advance old age (over 75)	X		1 female 1 male	20 female 30 male
	• Elderly people (over 65) in need of care	X		0	8 female 4 male
Health	• Physically disabled	X			2 female 5 male
	• Mentally disabled/mental issues	X			1 female 1 male
	• People with chronic diseases (heart, diabetes, blood pressure, kidney)	X		1 female 2 male	34 female 37 male
	• People with other significant health issues (cancer, Alzheimer)	X		1 male	9 female 1 male
Literacy	• Illiterate persons	X		1 female	0
Economic	• Economically displaced households who reported losing more than 20 percent of their Total Productive Area	X		2 households	20 households
	• Low-income households (total income lower than applicable minimum wage[114])	X		0	1 household
	• People with green card[115] or receiving governmental aid		X	0	0

[114] The net minimum wage applicable in Türkiye for the period **1 January 2026 to 31 December 2026** is **28,075.50 TRY**, while the gross minimum wage is **33,030.00 TRY**.

[115] A health card is provided in accordance with the **National Regulation on the State Coverage of Healthcare Expenses for Citizens Who Cannot Afford to Pay and the Green Card System**. The **type and content** of the card are determined based on the provisions of this Regulation.

Criterion	Specific Vulnerabilities	Relevance of Vulnerability Criteria to People Affected by Land Acquisition		Count of Individuals within Households with Respective Specific Vulnerabilities	
		Relevant	Not relevant	Physically displaced HHs	Economically displaced HHs
	• Household members employed without social security		X	0	0
	• Unemployed household members actively seeking work	X		1 male	4 female 4 male
	• Landless	X		3 households	22 households
Race, colour, birth, ethnicity; Language; Religion; Political or Other Opinion; National or Social Origin; Culture	• Migrant households		X	0	0
	• Migrant seasonal agricultural workers		X	0	0
	• Vulnerable due to any other criteria such as race, colour, birth, ethnicity; language; religion; political or other opinion; national or social origin; culture		X	0	0
Dependence on unique natural resources	• Dependent on water resources, • Dependent on grazing lands • Dependent on forest		X	0	0
Others	• Owners/users affected impacted by past expropriations and cumulative land acquisition impacts (with multiple parcels affected by the Project)	X		0	145 households
Total number of vulnerable individuals within affected households				**4 individuals in 12 households** • 2 female • 2 male	**138 individuals in 274 households** • 67 female • 71 male

Number of households with vulnerable members among the economically displaced and physically displaced households and households that do not actively use the land are summarised in Table 12-2.

Table 12-2. Number of Households with Vulnerable Members by Displacement Category within RAP Survey Sample

Displacement Category of Interviewed Households	Section	Total Number of Households within RAP Survey Sample	Number of Households with		
			No vulnerable members	Single vulnerable member	Multiple vulnerable members
Physically displaced households	Section 1 (KM 0-35)	6	4	2	0
	Section 2 (KM 35-70)	6	4	2	0
	Section 3 (KM 70-105)	--	--	--	--
	Total	**12**	**8**	**4**	**0**
Economically displaced households	Section 1 (KM 0-35)	173	116	35	22
	Section 2 (KM 35-70)	17	11	4	2
	Section 3 (KM 70-105)	84	43	33	8
	Total	**274**	**170**	**72**	**32**
Total		**286**	**178**	**76**	**32**

A comprehensive **vulnerability matrix** for **physically displaced households** within the RAP survey sample is presented in Table 12-3. The vulnerability matrix for **economically displaced households** within the RAP survey sample is presented in Appendix J.

Table 12-3. Vulnerability Matrix for Physically Displaced Households within the RAP Survey Sample

No.	District	Settlement	Parcel No	Individual Vulnerability												Number of different vulnerable individuals within the HH		
				Gender		Advance Old Age (over 75)		Illiterate		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Unemployed (Although looking for a job)				
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male
1	Silivri	Balaban	734/154				X (75)				X (75)		X (75)			**1**	**0**	**1**
2	Silivri	Çeltik	183/14													**0**	**0**	**0**
3	Silivri	Çeltik	180/20								X (62)					**1**	**0**	**1**
4	Silivri	Çeltik	180/22													**0**	**0**	**0**
5	Silivri	Çeltik	183/40													**0**	**0**	**0**
6	Çorlu	Seymen	104/42													**0**	**0**	**0**
7	Süleymanpaşa	Zafer	344/23													**0**	**0**	**0**
8	Süleymanpaşa	Zafer	347/2	X (90)		X (90)		X (90)		X (90)						**1**	**1**	**0**
9	Süleymanpaşa	Zafer	347/2													**0**	**0**	**0**
10	Süleymanpaşa	Zafer	347/2	X (54)										X (54)		**1**	**1**	**0**
11	Süleymanpaşa	Zafer	347/2													**0**	**0**	**0**
12	Süleymanpaşa	Zafer	347/2													**0**	**0**	**0**

12.2. Project-affected Businesses

During the February and March 2026 RAP surveys, affected business operators were interviewed to identify potentially vulnerable employees. The following vulnerability categories were assessed:

- Physically disabled/handicapped employees,
- Chronically ill employees,
- Migrant employees declared to be informally employed,
- Migrant employees declared to be formally employed,
- Non-migrant, nationally declared informally employed workers,
- Child workers (15–18 years of age),
- Elderly employees (over 65 years of age),
- Women with vulnerabilities (e.g. single women with children),
- Employees with vulnerable household members,
- Employees affected by the 2023 earthquake.

None of the affected businesses reported any vulnerable employees under the above-mentioned categories.

However, it was identified that one business owner has a daughter residing in the household who is 19 years of age and has a mental disability. As she is not an employee of the business, she does not fall within the scope of the vulnerability assessment for affected businesses; nonetheless, this vulnerability has been recorded and will be taken into consideration during RAP implementation.

12.3. Vulnerability Scoring Approach

The vulnerability assessment indicates that the most significant vulnerability patterns among affected households are associated with cumulative land acquisition impacts and landlessness. A substantial number of economically displaced households were identified as being affected by cumulative land acquisition impacts (due to past land acquisitions and/or multiple parcels affected by the Project), with 145 households reported under this category among the surveyed people. In addition, landlessness was identified as another major vulnerability factor, affecting 22 economically displaced households and 3 physically displaced households.

Other frequently observed vulnerabilities among affected people include chronic illnesses, advanced age, unemployment, female-headed households, and cumulative land acquisition exposure. Although a general age threshold of 65 plus is commonly used to define elderly status, the survey findings suggest this threshold may no longer adequately reflect functional dependency. Many individuals aged 65–74 remain physically active and engaged in agricultural activities, and they express a desire to continue contributing economically or to pass down farming responsibilities to their children. Therefore, a revised age categorisation was adopted in this RAP in accordance with the evolving international standards, distinguishing:

- 65 – 74 years: **Elderly**
- 75 years and above: **Advanced old age**

This stratification allows for a more nuanced understanding of vulnerability. Physical capacity and the ability to perform self-care emerged as more accurate indicators than chronological age alone.

Accordingly, the RAP commits to implementation of a **vulnerability scoring approach** where elderly individuals are **not** automatically classified as **highly vulnerable**. Instead, those with moderate to high levels of functional limitation –regardless of age – will be prioritised for enhanced support. Those with low vulnerability (i.e. who remain physically capable and economically active despite chronic health conditions) may still be eligible for general assistance, but not necessarily for targeted or intensive support packages.

This approach will ensure that support mechanisms are responsive to actual needs rather than assumptions based on demographic categories alone. It also avoids the inefficiency of offering land return or intensive compensation to individuals who, by their own assessment, are no longer willing or able to continue farming.

Accordingly, during the RAP implementation period:

- The SPV will continue to engage with affected individuals and households and will regularly update the **Affected Vulnerable Individuals** Database by adding newly identified vulnerable persons and households, in accordance with the criteria listed in Table 12-1.
- The SPV will consult with affected people to assess each household and validate vulnerabilities declared during the RAP surveys as part of a **vulnerability analysis** study, based on a **vulnerability scoring approach**. This is to determine the support needed and design household specific support packages (in-kind or cash). During the consultations, the SPV will request and review any supporting documentation (e.g., income and expenditure quintiles, documentation on total productive area of households) to verify declarations of affected people. As needed, the SPV will also consult with the relevant governmental officers, NGOs, and community representatives such as mukhtars and community representatives and involve them in the process.
- Based on the outcomes of ongoing field surveys, the SPV will revise the vulnerability criteria defined in this RAP if necessary and will finalise the list of households eligible for entitlements specific to vulnerable groups. A vulnerability analysis will be carried out to assess each case individually prior to delivery of support, and tailored support packages will be developed based on the specific vulnerabilities and needs of each affected household or individual.
- Support to vulnerable individuals and households will begin concurrently with the RAP implementation and will be delivered on a continuous basis throughout the **36-month** RAP implementation period. During delivery of assistance, the SPV – RAP Implementation Team will monitor the vulnerable individuals' or households' progress, adjust assistance where necessary, or agreed with the participant when vulnerable assistance is no longer needed. The vulnerability support tailored to each household's needs will be delivered as part of RAP implementation in parallel with the livelihood restoration packages outlined in Chapter 8. Support (where possible in-kind otherwise cash) will be provided as a one-off measure, while other forms of assistance will continue throughout the 36-month implementation period and may be extended, if necessary, until RAP Completion Audit. This process will be carried out in consultation with the affected households.

Vulnerability Scoring and Assessment

As the basis of the vulnerability scoring approach, a vulnerability scoring matrix has been developed as presented in Table 12-4.

The matrix is designed to systematically assess the relative vulnerability of households by applying a scoring system to specific criteria. Each vulnerability criterion is assigned a score on a scale from **1 to 5**, where **1** represents **very low** vulnerability and **5** represents very **high** vulnerability.

The scoring of each criterion for households will be proposed by the SPV's social team (Resettlement Specialist and CLOs), based on their professional assessment of households conducted through ongoing consultations with the affected households and the mukhtars of the respective settlements, while also taking into account the self-declared vulnerabilities of the households. The proposed scores will then be reviewed and approved by the SPV's E&S Manager. Where necessary, the CLOs will collect supporting documentation, such as medical records confirming disabilities, chronic health conditions, or special needs (if available); official records of government assistance (e.g., Green Card or other social aid programmes); and documentation on income levels or total productive area, both within and outside the expropriation corridor. In cases where households are unable to provide such documentation, the SPV may confirm the existence and degree of vulnerability through the mukhtars of the affected settlements, other credible community members or relevant governmental authorities where relevant.

Table 12-4. Vulnerability Scoring Matrix

Criterion	Specific Vulnerabilities	Vulnerability Score
Sex, gender	• Female head of household	5
	• Single man taking care of children	3
Children	• Children with special needs	5
	• Children of school age who do not attend school	3
Age	• Advance old age (over 75)	4
	• Elderly people (over 65) in need of care	3
Health	• Physically disabled	5
	• Mentally disabled/mental issues	5
	• People with **chronic** diseases (heart, diabetes, blood pressure, kidney)	1
	• People with **other significant** health issues (cancer, Alzheimer)	5
Literacy	• Illiterate persons	1
Economic	• Economically displaced households who **reported** losing more than 70 percent of their total productive area	5
	• Economically displaced households who reported losing 20-69 percent of their Total Productive Area	3
	• Low-income households (total income lower than applicable minimum wage[116])	5
	• People with green card[117] or receiving governmental aid	3
	• Household members employed without social security	1
	• Unemployed household members actively seeking work	1
	• Landless	4
Race, colour, birth, ethnicity; Language; Religion; Political or Other Opinion; National or Social Origin; Culture	• Migrant households	1
	• Migrant seasonal agricultural workers	1
	• Vulnerable due to any other criteria such as race, colour, birth, ethnicity; language; religion; political or other opinion; national or social origin; culture	3
Dependence on unique natural resources	• Dependent on water resources, • Dependent on grazing lands • Dependent on forest	3
Others	• Owners/users affected impacted by past expropriations	2
	• Household significantly affected by cumulative land acquisition impacts of the Project (with multiple impacted parcels) – 2 parcels	2
	• Household significantly affected by cumulative land acquisition impacts of the Project (with multiple impacted parcels) – 3 or 4 parcels	3
	• Household significantly affected by cumulative land acquisition impacts of the Project (with multiple impacted parcels) – 5 or more parcels	5

[116] The net minimum wage applicable in Türkiye for the period **1 January 2026 to 31 December 2026** is **28,075.50 TRY**, while the gross minimum wage is **33,030.00 TRY**.

[117] A health card is provided in accordance with the **National Regulation on the State Coverage of Healthcare Expenses for Citizens Who Cannot Afford to Pay and the Green Card System**. The **type and content** of the card are determined based on the provisions of this Regulation.

Households may fall under **multiple criteria**, and their cumulative vulnerability score reflects the total of all applicable categories. This scoring approach enables the identification of households with heightened vulnerability, allowing for prioritisation of support measures. Based on the cumulative vulnerability scores calculated for each household, an overall classification is developed to group households into categories of vulnerability.

As shown in Table 12-5, each household is categorised based on its cumulative vulnerability score, and each category is linked to a corresponding level of vulnerability support, which will, where feasible, be provided in-kind. This support is proportionate to the degree of vulnerability, **ranging from no support for households with no vulnerability to an equivalent of six times the net minimum wage** for households classified as highly vulnerable. Importantly, this support will be provided in addition to tailored assistance, which will address the specific and unique vulnerabilities of each household.

In practice, the scoring will reflect both the capacity of affected households to cope with displacement impacts and the type and scale of support needed to enhance their coping capacity. As an example, vulnerabilities such as female-headed households, physical or mental disability, serious health conditions (e.g., cancer), or low income, which limit a household's ability to manage displacement impacts and place them at a disadvantage, will receive the highest score of 5. Households assigned this score are automatically categorised as moderately vulnerable and entitled to receive in-kind compensation support. When multiple vulnerabilities are present, the overall level of vulnerability rises, which in turn increases the extent of support provided.

Table 12-5. Vulnerability Categories and Equivalent Vulnerability Support

Cumulative Household Score	Vulnerability Category of the Household according to Vulnerability Scoring	Equivalent Vulnerability Support from Vulnerable Groups Fund of the RAP Budget
0	No vulnerability	No vulnerability support
1 – 4	Low	**Two** times the net minimum wage **plus** tailored assistance
5 – 9	Moderate	**Four** times the net minimum wage **plus** tailored assistance
10 or higher	High	**Six** times the net minimum wage **plus** tailored assistance

It is important that the SPV – RAP Implementation Team review and validate the vulnerability category proposed by the scoring system, applying their professional judgment. In some cases, self-declared vulnerabilities that are not fully supported by relevant documentation may either overstate or understate the actual vulnerabilities of households. Therefore, the final assessment of the SPV – RAP Implementation Team will be considered authoritative for determining eligibility and delivering vulnerability support. Any justification for downgrading or upgrading the category, where it deviates from the scoring outcomes, will be recorded in the Affected Vulnerable Individuals Database.

During RAP implementation, adjustments to the scoring system may be made if required. An initial vulnerability scoring of the affected households has been carried out as part of this RAP. The vulnerability matrix for physically displaced households within the RAP survey sample is presented in Table 12-3, while the matrix for economically displaced households is provided in Appendix J. A breakdown of the number of households by vulnerability level is presented in Table 12-6. All data from the scoring exercise are recorded in the Project's Affected Vulnerable Individuals Database. This scoring will be reviewed and verified by the SPV during RAP implementation prior to the delivery of any support from the RAP Fund.

Table 12-6. Number of Households with Vulnerable Members by Displacement Category within RAP Survey Sample

Displacement Category of Interviewed Households		Total Number of Households within RAP Survey Sample	Number of Households with			
			No vulnerability	Low	Moderate	High
Physically displaced households	Section 1 (KM 0- 35)	6	4	1	0	1
	Section 2 (KM 35-70)	6	4	0	1	1
	Section 3 (KM 70-105)	0	--	--	--	--
	Total	**12**	**8**	**1**	**1**	**2**
Economically displaced households	Section 1 (KM 0- 35)	173	51	55	58	9
	Section 2 (KM 35-70)	17	8	7	2	0
	Section 3 (KM 70-105)	84	17	32	30	5
	Total	**274**	76	94	90	14

12.4. Support for Vulnerable Households

For households with vulnerable members, case-specific in-kind assistance and measures, which will be designed through direct engagement with the affected households in consideration of their special needs, will be provided.

The following general support mechanisms will be offered to **physically and economically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

- Enhanced Communication and Consultation: Special attention will be given during information dissemination, consultation, negotiation, and post-resettlement monitoring. Customised methods and tools will be developed and implemented to address the specific needs of each vulnerable affected person, in accordance with the Project's SEP. The SPV – RAP Implementation Team will ensure that vulnerable individuals and groups are specifically informed about the land acquisition process, the RAP, and the grievance mechanism, and supported to understand and sign household agreements.

- Assistance with Compensation Procedures: Support will be offered to assist vulnerable affected people in tracking and/or accessing their compensation payments throughout the RAP implementation. This may include notifying PAPs of court decisions, assisting with the preparation of necessary documentation, providing guidance and support in the use of online platforms (e.g. e-state, online banking, et.) where necessary, and helping to resolve issues that may create obstacles to accessing compensation through communication and coordination with the relevant authorities, where necessary.

- Institutional Access and Legal Assistance: Vulnerable individuals will receive help accessing governmental institutions and legal services when needed. This may include logistical support, communication assistance, and help with preparing required official documents, completion of inheritance procedures, etc.

- Support for Administrative Processes: Illiterate individuals, the elderly, and others requiring support will be assisted in reviewing and processing documents related to expropriation and compensation.

- Access to Government Programs: Support will be provided to help vulnerable individuals access and apply to existing governmental support programs designed for people with special needs or disadvantages.

- Employment Opportunities: Priority will be given to one eligible and capable household member from vulnerable physically displaced households and economically displaced households who are significantly[118] affected by Project-related land acquisition for employment opportunities created by the Project, provided they meet the employment criteria.

The following specific support mechanisms will be offered to **physically displaced households with vulnerable members**, based on the specific vulnerabilities and needs identified during the RAP implementation phase:

[118]Economically displaced households who lose more than 20 percent of their Total Productive Area.

- Modifications to Replacement Housing for Persons with Disabilities: Replacement housing provided to or found by physically displaced households with members who have disabilities will be customised as needed to ensure accessibility, safety, and comfort. Modifications may include the installation of ramps, handrails, accessible bathroom facilities, or other design adaptations based on individual requirements identified during consultations.

- Provision of Food Packages: Low-income will be supported through the periodic distribution of food packages during relocation process, especially immediately following displacement or during the early phases of RAP implementation.

- Access to Health Care Services: The Project will facilitate access to essential health care services for vulnerable individuals, particularly the elderly, chronically ill, persons with disabilities, and those without regular access to medical facilities. This may include support in scheduling appointments, covering transport to health care providers, or connecting with available public health programs.

- Access to a Nearby Garden Area: Where feasible, the Project will support the development of accessible garden areas near resettlement sites. These areas will offer opportunities for small-scale gardening activities, supporting both food security and psychosocial well-being, particularly for elderly or economically disadvantaged individuals.

- Opportunities for Project Employment: Vulnerable individuals, or eligible members of vulnerable households, will be given priority consideration for employment opportunities generated by the Project. Employment will be contingent upon meeting relevant job requirements, and the RAP Implementation Team will assist in identifying suitable roles, supporting applications, and providing any necessary orientation or training.

For **vulnerable individuals**, the SPV – RAP Implementation Team will provide non-cash support mechanisms (e.g., logistical and administrative assistance) to elderly persons, persons with disabilities, women-headed households, and other vulnerable groups, ensuring that costs such as travel expenses are not incurred and borne by vulnerable individuals. To this end, site-based Project personnel will accompany individuals with specific vulnerabilities – for example, when going to the bank, following up on deposit transactions, or withdrawing compensation amounts deposited by KGM. Where necessary, the SPV will make payments directly on their behalf to avoid expenses from being borne by vulnerable individuals.

Table 12-7 provides a summary of the support and assistance provided to affected households with vulnerable members.

Table 12-7. Support and Assistance for Affected Households with Vulnerable Members

Category	Support Framework	Description of Support	Beneficiaries
All physically and economically displaced households with vulnerable members	Priority in accessing and benefiting from livelihood restoration, improvement, and assistance measures will be ensured through proactive approach and the use of special information and consultation methods. Assistance will be provided in accessing support programs offered by governmental institutions or other non-governmental organisations.	Support will be provided by the SPV to vulnerable households identified during RAP implementation. A preliminary list of vulnerability criteria is included in Chapter 12. Final eligibility will be confirmed through household-level assessments to be carried by the SPV during RAP implementation. For budgeting purposes, an estimated support value equivalent to up to **six times the national net minimum wage** per vulnerable household has been considered. This support will be primarily delivered in the form of **in-kind assistance.** Vulnerable households affected by physical and/or economic displacement will be prioritised for all livelihood restoration, improvement, and assistance measures outlined in the RAP. In line with the IFC PS5 guidance on meaningful consultation, specific communication methods tailored to the needs of vulnerable groups will be used. These include targeted outreach, simplified materials, and individual-level engagement by the SPV – RAP Implementation Team. The SPV, with support from the EPC – Expropriation Team, along with the SPV and EPC CLOs and other designated personnel, will provide the following support: • **Information and Notification**: Timely updates regarding expropriation status and court decisions, based on notifications received from KGM, will be provided to vulnerable PAPs; • **Orphan Land Cases**: Assistance with applications to KGM for acquisition of remaining, unusable land parcels (orphan lands), including help with documentation, communication, and logistics; • **Access to Compensation**: Support in completing legal and administrative procedures to enable timely access to expropriation payments – particularly in cases requiring notarial work, inheritance documentation, or coordination with relevant institutions; • **Legal and Institutional Navigation**: Facilitation of access to legal advice and public institutions, including assistance with preparing and submitting required documentation; • **Access to Government and NGO Support Programs**: Assistance in identifying and applying to existing government or third-party support programs targeting vulnerable individuals or households. This approach ensures that livelihood restoration and compensation measures are equitably implemented and that no individual or group is disadvantaged in accessing their entitlements, in compliance with IFC PS5.	Beneficiary individuals or households will be determined by the SPV – RAP Implementation Team, during the RAP implementation phase.
Physically displaced households with vulnerable members	Soft support for relocation	The SPV, through its CLOs and other appropriate in-house personnel, will provide logistical and administrative support to facilitate key processes. This includes assistance with: • Facilitating consultations with relevant governmental authorities to identify alternative land for constructing replacement housing or to locate available housing options, with particular attention to the needs of elderly and women-headed households. • Residency registration	Beneficiary individuals or households will be determined by the SPV – RAP Implementation Team, during the RAP implementation phase

Category	Support Framework	Description of Support	Beneficiaries
including disabled member, chronic diseases, children, home-bound elderly, and other vulnerability categories as required		• School enrolment and education-related processes • Access to health services through local family health centres • Utility subscriptions and connections (electricity, water, gas, etc.) Support will cover the preparation of necessary documentation and other logistical needs during the relocation process.	
Gender related vulnerabilities	Gender-Inclusive and Vulnerability-Focused Measures to Support Women's Livelihood Activities	The entitlements provided under this RAP by the SPV will be extended to include both female and male spouses within affected households. Where needed or requested, the SPV site teams will provide support to individuals in opening bank accounts to facilitate direct access to compensation and support payments. Unemployed female members of physically and/or economically displaced households who are actively seeking employment will be given priority for job opportunities within the Project – during both the construction and operation phases – subject to their qualifications and skills. The SPV CLOs will ensure that eligible women are informed about available positions relevant to their experience and capabilities. Training programmes to be designed and delivered by the third-party consultants will consider alternative, sustainable livelihood options tailored to the needs of female and other vulnerable members of the affected households. This includes, for example, unemployed high school and university graduates, and women interested in pursuing formal (insured) employment. Support to vulnerable households and women under the RAP will be complemented through initiatives under the Community Development Plan (CDP), which will be developed and implemented by the SPV (see Section 8.11). • Provide registration support for women in the ÇKS or equivalent systems. • Offer assistance packages specifically for women during relocation, such as: • Home reorganization or cleaning support • Start-up kits for household needs • Access to child or elder care to reduce domestic burden	Beneficiary individuals or households will be identified by the SPV – RAP Implementation Team during the RAP implementation phase. This process will include the identification of women agricultural users, as well as female members of physically or economically displaced households who are considered vulnerable.

13. Monitoring

Monitoring as part of RAP implementation will aim to track the progress of RAP implementation; assess whether the outcomes align with RAP objectives and identify any obstacles to their achievement; and identify areas needing improvement and propose corrective actions for any deviations from RAP objectives.

Monitoring will be conducted both **internally** and **externally**, as outlined below:

- **Internal monitoring** of the RAP implementation will be conducted by the **SPV – RAP Implementation Team**, with support from third-party implementation partners and consultants to be contracted by the SPV, as necessary. This will look at resettlement progress and performance, as a component of the Project ESMS as mandated by IFC PS1.
- **External monitoring** will include (i) periodic monitoring by LESA as part of their post-financial close E&S monitoring covering IFC PS5, and (ii) RAP completion audit.

Further details on the internal and external monitoring components are provided in the following sections. The monitoring and reporting framework for RAP implementation, including monitoring indicators for internal monitoring, is presented in Table 13-1.

Based on the findings from internal and external monitoring activities, the RAP will be reviewed and updated as necessary, through addenda documents or change management reports.

The process to be followed in the event of potential additional expropriation works and change management are discussed in Section 3.8.5.

13.1. Internal (Self) RAP Monitoring

The internal (self) monitoring by the SPV – RAP Implementation Team will begin following the approval of RAP by Lenders. It will be conducted to assess ongoing activities and progress including the following objectives aligned with IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023):

- Actions and commitments defined in this RAP are implemented fully and delivered on time.
- RAP actions and compensation measures are effective in helping affected persons in restoring their homes and in sustaining/improving pre-project living standards.
- Complaints and grievances are being followed up with appropriate corrective actions and tracking of outcomes.
- PAPs are informed about Project's displacement impacts and mitigations and have a say in the design of mitigation measures.
- Vulnerable persons are tracked and assisted as necessary.
- Recurrent or systemic problems that require correction are identified and fixed.

Monitoring Indicators

The internal monitoring indicators for internal monitoring, aligned with IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023) and tailored to the nature and scope of displacement impacts, is presented in Table 13-1. Some of the indicators will be used as **key performance indicators (KPIs)**, as identified in the last column of the table.

Monitoring Methods

The monitoring methods will include the following:

- Review of expropriation and RAP implementation data (expropriation tracker, grievance logs, compensation records, human resources records, financial records, etc.) compiled by various Project teams
- Review of Project's Grievance Database
- Consultations with the KGM and other Project stakeholders
- Surveys conducted over a stratified sample of affected households (such as physically and economically displaced households), and comparison of monitoring data with baseline conditions
- Surveys conducted with relocated businesses and their employees, and comparison of monitoring data with baseline conditions

Monitoring Frequency

The internal monitoring frequency for specific indicators will be as follows:

- During RAP implementation: **Monthly monitoring and quarterly self-reporting to the Lenders and the LESA** (see Table 13-1).
- Post-implementation, until RAP Completion Audit: **Bi-annually for two years after the completion of RAP implementation period** – hence completion of all RAP actions.

Internal (Self) RAP Monitoring Reports

The SPV – RAP Implementation Team will prepare periodic **Internal (Self) RAP Monitoring Reports,** incorporating the findings of ongoing monitoring activities.

The reporting frequency will be as follows:

- During RAP implementation: **Quarterly**
- Post-implementation, until RAP Completion Audit: **Bi-annually**

The Corporate Senior Management representatives and SPV Senior Management will be provided with copies of the internal RAP Monitoring Reports**.**

Using the relevant monitoring indicators, the **Internal RAP Monitoring Repor**t will provide information on the following aspects for the respective reporting period:

- **Introduction,** including general information on the Project and construction progress as well as any changes to the Project introduced during the reporting period;
- **Overview of land acquisition progress**, based on data from KGM on expropriated parcels and structures, status of agreement protocols (for shares and parcels), status of compensation payments by KGM, court cases (direct Article 10 or Article 27 followed by Article 10), status of title deed registry, expropriation decisions, etc.
- **Overview of RAP implementation progress**, detailing key activities carried out during the reporting period according to RAP entitlement matrix, including status of compensation payments by SPV from RAP fund, relocation of affected houses, businesses and other structures, resettlement sites, gender integration in RAP implementation, key observations, and any challenges encountered; etc.
- **Livelihood restoration and assistance activities**, including status of implemented measures; progress on livelihood/income restoration for economically displaced persons; evaluation of the adequacy and appropriateness of ongoing or planned livelihood support programs;
- **Stakeholder engagement and information disclosure**, detailing types of consultations, locations, and number of participants, photographic records, press/media coverage; key issues or concerns raised, along with responses and action plans;
- **Grievance management mechanism,** with an assessment of functionality of the grievance mechanism, including number and types of complaints received, separate tracking of grievances submitted by vulnerable or disadvantaged individuals/groups;
- **Vulnerable people,** including measures taken to protected affected vulnerable persons and groups, addressing of gender-specific vulnerabilities, etc.;
- **Capacity,** including staffing with composition of implementation team, services from third-party implementation partners and consultants, etc. Summary of the adequacy, readiness, and competency of the human resources involved;
- **Budget**, with allocation and disbursement of RAP fund, in line with the RAP and implementation schedule;
- **Key findings** of the reporting period, including any non-conformities identified and proposed time-bound Corrective Action Plan.

Table 13-1. Framework of Internal and External RAP Monitoring

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implementation)	KPI?
A.	**Internal Monitoring**			
	Expropriation and Compensation			
1.	Overall spending by KGM from expropriation budget	Expropriation tracker	Monthly	**Yes**
2.	Number of agreement protocols signed with affected owners/shareholders, disaggregated by settlement and gender etc.	Expropriation tracker	Monthly	**Yes**
3.	Number of expropriated parcels and shares, disaggregated by settlement and registry type	Expropriation tracker	Monthly	**Yes**
4.	Number of court cases opened and concluded in this reporting period, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	**Yes**
5.	Number of ongoing court cases and trends over time, with distribution by type (Article 27 and Article 10)	Expropriation tracker	Monthly	No
6.	New accelerated expropriation decision(s) issued for the Project	Official gazette	Monthly	No
7.	New expropriation decision(s) taken by KGM for the Project	Official correspondence	Monthly	No
8.	Difference between land seizure and final expropriation values determined by the courts through Article 27 and 10 processes	Expropriation tracker	Quarterly	No
9.	Average time for payment of compensation (after Article 8, Article 27 and Article 10)	Expropriation tracker	Monthly	**Yes**
10.	Has there been any valuation update to take account of value increases in lands, structures, trees and crops	Valuation report of KGM	Yearly	**Yes**
	Construction			
11.	Number of public and private parcels entered by the Project, with their land take and permitting status	Construction progress report	Monthly	**Yes**
12.	Number and/or location of existing infrastructure displaced due to Project, with status of displacement works	Construction progress report	Monthly	No
13.	Are there any additional underpasses, overpasses or other engineering structures requested by the stakeholder and included in the Project (if any as required)?	Construction progress report	Monthly	No
	RAP Compensation			
14.	Overall spending by SPV from RAP fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	Financial records	Monthly	**Yes**
15.	Number of households that received cash compensation from RAP Fund (with breakdown according to entitlement types, disaggregated by settlement and gender)	RAP Database	Monthly	No
	Capacity			
16.	Number of full-time and part-time staff under SPV's RAP Implementation Team and EPC Contractor's organisation	HR records	Quarterly	**Yes**
17.	Number of third-party consultants (and their staff, where applicable) dedicated to resettlement, compensation and livelihood restoration activities	Contractual records	Quarterly	No
18.	Number of vehicles, computers, GPS units, and other equipment, as applicable	Count	Quarterly	No
	Physical Displacement – Affected Houses			
19.	Number of households relocated, with distribution by tenure, vulnerability, gender of household members	Through surveys	Monthly	**Yes**
20.	Number of replacement dwellings purchased, rented or construction commenced or completed (by owners, formal renters and informal users of affected houses)	Through surveys	Monthly	**Yes**
21.	Number of households moved into their replacement dwellings	Through surveys	Monthly	**Yes**
22.	Whether recipients of cash compensation were able to purchase similar properties	Through surveys	Quarterly	**Yes**
23.	Are relocated households satisfied with their replacement housing	Through surveys	Quarterly	No
24.	How was the received cash compensation used/invested?	Through surveys	Quarterly	No
25.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	**Yes**
26.	Are there construction and operation phase impacts such as loss of value, noise, etc. causing economic impacts on houses?	Through surveys	Quarterly	No
	Economic Displacement – Affected Lands			
27.	Number of households replacing affected land and area of replacement land actually secured by affected households	Through surveys	Quarterly	**Yes**
28.	Are household incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	**Yes**
29.	Number of households that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with	Through surveys	Quarterly	No

No.	Monitoring Indicator	Monitoring Method/ Measured How	Monitoring Frequency (during RAP Implementation)	KPI?
	distribution by type of training (agriculture, business, etc.)			
30.	Are there economic losses or issues experienced by land users due to land fragmentation or other Project-related factors?	Through surveys	Quarterly	No
31.	Regular inspections of crossings in accordance with the SEVMP	Through surveys	Quarterly	**Yes**
32.	Key Monitoring Indicators Section 8.8 for LRP monitoring indicators			**Yes**
	Affected Businesses (if any)			
33.	Number of businesses relocated, with distribution by tenure, vulnerability	Through surveys	Monthly	**Yes**
34.	Have relocated businesses been successfully reestablished?	Through surveys	Quarterly	**Yes**
35.	Are there still any business interruptions faced by the relocated businesses?	Through surveys	Quarterly	**Yes**
36.	Are business incomes restored or facing any type of hardship in restoring livelihoods?	Through surveys	Quarterly	**Yes**
37.	Number of businesses that received livelihood-restoration-related training or other assistance from RAP Implementation Team, with distribution by type of training (agriculture, business, etc.)	Through surveys	Quarterly	No
38.	Are there any businesses that ceased operations due to relocation?	Through surveys	Yearly	**Yes**
39.	Have business operators whose lands or structures were affected partially – but who did not require relocation – experienced any economic loss?	Through surveys	Yearly	No
40.	Are employees still employed in the relocated business?	Through surveys	Yearly	No
	Stakeholder Engagement and Grievance Management			
41.	Number of stakeholder engagement activities and affected people engaged with (number of attendees disaggregated by settlement and gender)	Stakeholder Engagement Log	Quarterly	**Yes**
42.	Average time for grievance processing	Grievance Database	Monthly	**Yes**
43.	Number of open grievances (pending resolution since last reporting period), disaggregated by settlement, subject, gender and relevant Project party (KGM, SPV, EPC, etc.)	Grievance Database	Monthly	**Yes**
44.	Number of grievances opened and closed and trends over time, disaggregated by settlement, subject, gender, and relevant Project party (KGM, SPV, EPC, etc.)	Grievance Database	Monthly	No
45.	Number of gender-based violence and harassment related grievances linked to the land acquisition process	Grievance Database	Monthly	**Yes**
46.	Number of land acquisition requests for orphan or fragmented lands received by KGM	KGM records	Quarterly	No
	Vulnerability			
47.	Number of vulnerable households assisted through RAP Fund, disaggregated by settlement and gender	Through surveys	Quarterly	**Yes**
48.	Have some households become vulnerable after land acquisition, are there cases of hardship or changed households circumstance?	Through surveys	Yearly	No
49.	Have some households previously identified as vulnerable improved their status?	Through surveys	Yearly	No
50.	Has special assistance been provided to vulnerable employees or employees with vulnerable household members?	Through surveys	Yearly	No
B.	**External Monitoring**			
B.1.	**Periodic Independent E&S Monitoring by LESA, including PS5**			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements including the Guidance Note on the Selection and Scope of Work for Lender's Independent E&S Consultants published by Equator Principles[119]		During construction: **Quarterly** During operation: **Bi-annually or annually** (to be decided by Lenders)	
B.2.	**RAP Completion Audit (by Independent Resettlement Experts)**			
	The indicators will be aligned with the RAP monitoring indicators and comply with the Lender's requirements for RAP Completion Audit.		**One-off** – to be conducted two years after the completion of all RAP actions, including post-implementation monitoring.	

[119] https://equator-principles.com/app/uploads/PUBLIC-Guidance_Selection-and-SoW-for-IESCs.pdf

13.2. External RAP Monitoring

External monitoring will be carried out by LESA to independently assesses performance and compliance with IFC PS5 and other applicable standards of Lenders. The external monitoring framework is presented in Table 13-1.

Beyond demonstrating compliance to Lenders and other stakeholders, external monitoring will serve as an independent assessment of the resettlement process's effectiveness – particularly in determining whether affected livelihoods have been restored or improved.

In accordance with the IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023), external monitoring will include the following components:

- **Periodic E&S monitoring by the LESA**, including assessment of compliance with IFC PS5
- A **RAP Completion Audit** meant to confirm that commitments in the RAP have been met, particularly those pertaining to livelihood restoration.

13.2.1. LESA's Periodic E&S Monitoring

As part of its post-signing scope, the LESA will conduct periodic monitoring of the Project's E&S activities and impacts to ensure compliance with Lender standards and requirements, including IFC PS 5, and other applicable land acquisition and resettlement requirements set by the Lenders.

Monitoring will be conducted on a **quarterly** basis during the **construction** phase (i.e. the 36-month period following the signing of the finance agreement between the SPV and the Lenders), which will largely coincide with the RAP implementation period. During the **operational** phase – which partially overlaps with the post-implementation monitoring period and concludes with the RAP Completion Audit in the early years of operations – E&S monitoring by the LESA will be conducted either **bi-annually or annually**, as determined by the Lenders prior to signing.

The outcomes of each monitoring exercise by the LESA – including progress on land acquisition and an independent assessment of the Project's RAP implementation performance – will be documented in monitoring reports prepared by the LESA and submitted to both the Lenders and the SPV.

Periodic E&S monitoring by LESA will be in accordance with the Guidance Note on the Selection and Scope of Work for Lender's Independent E&S Consultants published by Equator Principles[120].

In accordance with the "Scope of Work Template for Post-Financial Close Monitoring" provided in Annex 5 of the EP Guidance Note, the following components will be covered under LESA's periodic E&S monitoring:

- "*Review of the Borrowers' Self-Monitoring Report*" including "***Overview of RAP Implementation Status***"
- "*During the period of RAP implementation, compliance will be evaluated during the site visit by: spot-check reviews of relevant agreements and other documentation for a small sample of individual PAPs; and interviews with selected Project Affected People (PAPs) complainants under the grievance mechanism and relevant local Authorities, Assemblies, Community Representatives, NGOs and any other independent third parties involved in monitoring of RAP implementation. Information will be sought from PAPs, grievant and the Authorities/Assemblies/Community Representatives on the community's perception of the RAP implementation process and feedback on any issues that could indicate non-compliance with the RAP*"
- *"Interim RAP Status Reviews: The LESA will review the RAP documentation for each construction section/area prior to commencement of work in that section/area. The review would be based on a high-level review of the summary RAP status and the RAP implementation database, followed by a sample-based review of the administrative records of agreements/payments for a small sample of PAPs. This review will be used to give an opinion on whether the administrative process for RAP implementation prior to land clearance has been addressed as per the requirements given in the RAP. In the case where such review coincides with a quarterly site visit, then the compliance process can include field-based interviews as described above"*

[120] https://equator-principles.com/app/uploads/PUBLIC-Guidance_Selection-and-SoW-for-IESCs.pdf

13.2.2. RAP Completion Audit

As required by IFC PS5, a **RAP Completion Audit** will be undertaken **by competent external independent resettlement experts**[121] once all mitigation measures have been substantially completed and once displaced persons are deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods.

Timing

The completion audit will be conducted following the conclusion of the post-implementation RAP monitoring period – which extends **one to two years beyond the completion of the RAP implementation** – subject to the Lenders' approval. This timeline is intended to allow sufficient time for the sustainable restoration of livelihoods

Objectives

The completion audit will involve a more in-depth assessment than regular resettlement monitoring activities, including at a minimum:

- A review of all mitigation measures with respect to the physical and/or economic displacement implemented by the SPV,
- A comparison of implementation outcomes against agreed objectives,
- A conclusion as to whether the monitoring process can be ended, and
- Where necessary, a Corrective Action Plan listing outstanding actions necessary to met the objectives.

Key objectives of the audit will be to undertake the following:

- Assess the effectiveness of all measures to avoid and minimize displacement impacts by comparing final Project impacts on land and people against those anticipated in the RAP.
- Verify that all entitlements and commitments described in the RAP have been delivered and verify that delivery of compensation and livelihood-restoration measures was transparent, equitable, and prompt.
- Determine whether RAP measures have been effective in restoring or enhancing affected persons' living standards and livelihoods, including both men and women and vulnerable people.
- Check that resettlement-related grievances and court cases have been satisfactorily resolved (or that adequate provision has been made for their resolution in the near future).
- Check that gender barriers have been effectively challenged to ensure improved livelihood opportunities for women.
- Identify any corrective actions to achieve completion of RAP commitments and prepare a corrective plan if warranted.

Methodology

The methodology of the RAP Completion Audit to be conducted by external independent resettlement specialists will follow the relevant recommendations of IFC's Good Practice Handbook on Land Acquisition and Involuntary Resettlement (2023). It will draw on the data generated by ongoing internal monitoring by SPV and the findings of the LESA's periodic monitoring and external compliance reviews.

An indicative **table of contents for RAP Completion Audit** is presented **below**. The report will present conclusions on livelihood improvement or restoration and identify any corrective measures necessary to achieve livelihood restoration (as a minimum) for displaced households and focus on whether physically displaced people have been successfully resettled, have security of tenure, and have similar or improved living standards. Particularly where cash compensation is offered, the report will verify that compensation was at full replacement cost and that people invested their compensation in replacing their homes and/or other assets, particularly those critical to livelihoods, such as agricultural land.

[121] May be a resettlement specialist, specialist company or group of specialists that have not been previously involved with the Project that is being audited.

RAP Completion Audit
– Indicative Table of Contents[122]

1. Executive Summary:

[Concise summary of resettlement undertaken to date, need for any on-going resettlement, magnitude of displacement, activities undertaken, grievances and key issues addressed, outstanding and on-going monitoring and evaluation processes and key recommendations]

2. Background

[A brief description of the monitoring process to date covering the Project and impacted communities, magnitude of displacement, key resettlement and livelihood impacts, legal framework, eligibility criteria and entitlement framework, timing of the various components of physical and economic displacement undertaken, resettlement and/or livelihood restoration activities and compensation provided and major or outstanding issues or grievances]

3. Review Objectives

[Outline of the main objectives of the resettlement and/or livelihood restoration plan and a summary of studies and activities undertaken in support of resettlement implementation and livelihood restoration (e.g., preliminary and on-going consultation, stakeholder mapping and census surveys, asset surveys, socio-economic baseline studies, participatory planning meetings, site selection studies, organizational structures for implementation), and assessment of the process and evaluation of the outcome (including any participatory monitoring and evaluation methodologies used)]

4. Key Findings:

[Issues to be considered may include, among others:
- Extent of public information and consultation in advance of land acquisition, and adequacy of ongoing consultation
- Types of compensation provided and adequacy of that compensation (e.g., sufficient to cover replacement costs of lost assets, housing conditions, compensation/entitlements, income restoration and livelihood sustainability measures)
- Level of participation of affected people in decisions regarding compensation rates, location of new resettlement sites and options for livelihood restoration
- Adequacy of replacement housing in terms of physical structure, location, and access to resources and services
- Effectiveness of livelihood restoration measures
- Integration into host communities
- Impact on cultural property
- Measures taken to protect (affected) vulnerable persons and groups
- Adequacy of the grievance redress process and outcomes
- Monitoring and evaluation process and outcomes]

5. Conclusion and Key Recommendations/Corrective Actions:

[Concise summary of conclusions and recommendations, and for any gaps or outstanding issues, provide a proposed time bound Corrective Action]

[122] This indicative outline is based on IFC Guidance Note 5 on Land Acquisition and Involuntary Resettlement, Annex B. It may be revised as necessary to reflect specific Project circumstances (such as relocation of affected businesses) identified during the RAP implementation and monitoring period, or updates to the applicable international standards.

14. Roles and Responsibilities

This Chapter outlines the respective **responsibilities of the public and private partners** in relation to the implementation of the RAP and describes the KGM's Public – Private Partnership Regional Directorate (KÖSOB – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*), which supports effective implementation of the Project in accordance with national legislation and the Lenders' requirements related to the RAP:

- Split responsibilities of the KGM and SPV under **the BOT Contract**
- Responsibilities of KGM in accordance with the **Expropriation Law**
- Responsibilities of the SPV under this **RAP** to fulfil Lenders' requirements

The SPV will submit and present the RAP to KGM (in Turkish) following approval of the documents by the Lenders. The SPV will keep the Lenders informed about this process, provide relevant documentation on the communication and meetings, and share any verbal or written feedback received from KGM, if any. Any feedback from KGM on the RAP will be incorporated into the documents, as appropriate, in consultation with and subject to the approval of the Lenders.

KGM – through KÖSOB – has been supporting the SPV and the RAP Consultant Team with the provision of land acquisition data necessary for RPF and RAP preparation and has expressed its commitment to continue supporting them for RAP implementation, without any delay or restriction.

14.1. Responsibilities under BOT Contract

The land acquisition responsibilities of KGM, along with the contractual obligations of the SPV, are defined in the **MoU** signed for the KM Section and its annexes.

Accordingly, responsibility of KGM is limited to execution of expropriation in line with the Expropriation Law of Türkiye. As such, implementation of RAP measures including livelihood restoration, assistance to vulnerable people, compensation of informal users as well as stakeholder engagement and monitoring – including allocation and disbursement of the budget required for RAP implementation (RAP Fund) **will be the responsibility of the SPV – in agreement with KGM**.

The detailed responsibilities of the KGM, as the **Contracting Authority**, and the SPV, as the **Appointed Company** are further presented in Table 14-1 and elaborated in the subsequent sections of this Chapter.

Table 14-1. Land Acquisition related Responsibilities of KGM and the SPV as per the BOT Contract – Article 13 and the MoU

Subject	Appointed Company – SPV	Contracting Authority / Administration – KGM
Expropriation programme	The Appointed Company shall notify the Administration of the expropriation requests required to fulfil its construction and operation obligations. The expropriation programme, to be submitted together with detailed land descriptions showing the boundaries of the requested land (immovable property), ownership information, and coordinate-based plans, shall be delivered to the Administration **6 (six)** months prior to the date of use of the relevant land in accordance with the approved Work Program.	Expropriation procedures shall be carried out by the Administration according to the provisions of Expropriation Law No. 2942. The Administration shall carry out expropriation operations according to the approved Work Program.
Expropriation cost	According to MoU, the expropriation cost is limited to the payment of a total amount of **EUR 32,000,000.00** by the Appointed Company to the Administration, to be made **at the time of the first loan disbursement** under the financing secured for the Project. All costs related to expropriation activities to be carried out, including real estate valuation engineering services, engineering services for the execution and completion of expropriation procedures, procurement of such services, and other expenses (excluding litigation costs arising from expropriation cases filed against the Administration), shall be borne separately by the Appointed Company.	The expropriation cost above the indicated amount shall be paid by the Administration.

Subject	Appointed Company – SPV	Contracting Authority / Administration – KGM
Allocation, Establishment of Easement Rights, Granting of Usage Permits, Easement Right and Usage Permit Fees, and Revenue Share	The Appointed Company shall first identify and notify the Administration of the ownership and usage status of the lands located within areas such as material quarry sites, construction and storage areas belonging to itself, and the construction site areas, all types of quarry areas (borrow pits, stone quarries, etc.), and excavation surplus material storage areas that will be required during the implementation of the Project, by conducting land surveys, reviewing the relevant legal regulations, and transferring such information onto maps and reports through process flow charts.	The Administration shall permit the use of suitable areas among those owned by or allocated to it for purposes such as construction site areas, all types of quarry areas (borrow pits, stone quarries, etc.), and excavation surplus material storage areas required for the implementation of the Project. In cases where neither is available, such required areas shall be identified through the joint efforts of the Appointed Company and the Administration. The time spent for these procedures shall not be included in the construction or operation period. The Administration shall complete the allocation procedures for immovable properties under the private ownership of the Treasury and places under the rule and disposal of the State and shall make them available for use by the Appointed Company. Within the scope of this Agreement, easement rights shall be established free of charge in favour of the Appointed Company over immovable properties under the private ownership of the Treasury to be allocated for the use of the Appointed Company. For places under the rule and disposal of the State, where possible, the Administration shall carry out the necessary correspondence with the relevant institutions and organisations in order to obtain allocations in the name of the Administration and allocate them to the Appointed Company, provided that they are used within the scope of the contractual works, and usage permits shall be granted free of charge to the Appointed Company for use during the construction period. The related costs shall be borne by the Appointed Company. Furthermore, in cases where the areas belonging to the Administration and the Treasury are insufficient, regardless of ownership status (including immovable properties owned by private individuals and public legal entities), the Administration shall assist the Appointed Company regarding the expropriation/allocation of such areas.
Capacity enhancement	The Appointed Company shall, upon the request of the Administration, provide sufficient technical and administrative personnel, technical equipment, vehicles and tools for the use of the Administration, free of charge, in order to ensure that expropriation processes are completed more effectively and within a shorter period.	-

Source: BOT Contract.

14.2. Contracting Authority – KGM

The contracting authority of the Project – MoTI represented by the KGM – is responsible for executing Project-related land acquisition and expropriation in accordance with the Expropriation Law of Türkiye. For this Project, the land acquisition process carried out by KGM under the Expropriation Law includes the following:

- **Expropriation of privately-owned parcels.**
- **Allocation of state-owned parcels** including treasury lands, forestry lands, non-registered lands as well as lands owned by legal entities – for permanent or temporary use by the Project during the construction period.
- **Coordination of the identification process** for affected infrastructure and above-ground facilities belonging to other institutions that overlap with the Project, and execution of official correspondence with the relevant institutions – with the SPV responsible for any required follow-up correspondence or communication.

Expropriation procedures at the KGM are administered centrally by the **Department of Immovables** at the **General Directorate** level. At the site level, the procedures are administered by KÖSOB – **Chief Immovables Engineering Department,** which operates under the authority and oversight of the central Department of Immovables.

As per the Expropriation Law, the KGM holds several key responsibilities regarding the expropriation of privately-owned parcels. These responsibilities include, but are not limited to, the following:

- Approval of Expropriation Plans: KGM is responsible for approving expropriation plans prepared by the national engineering firm (valuation contractor) appointed by the SPV. These plans include a comprehensive inventory of assets along the Motorway's expropriation corridor and identify the corresponding legal owners and shareholders.
- Valuation of Immovable Assets: KGM ensures the valuation of immovable assets is conducted in accordance with the Valuation Methodology (Section 6.3).
- Notification and Invitation to Negotiations: KGM formally notifies the identified owners and shareholders (including rightful heirs) and invites them to participate in negotiations regarding the expropriation through Article 8 notifications.
- Conducting Negotiations: Through a Negotiation Commission established by KGM under Article 8, the agency undertakes negotiations with the owners and shareholders participating in the negotiation meetings.
- Documentation and Legal Proceedings: KGM documents both agreements (through **agreement** protocols) and no agreement cases (maybe due to disagreement, waiver ("*imtina*") or non-attendance cases) with affected people. In cases of no agreement, the agency initiates court proceedings pursuant to direct Article 10 or Article 27 (followed by Article 10) of the Expropriation Law (noting that Article 27 has not been implemented in the Project to date).
- Finalising Land Registry and Payment: KGM oversees the completion of land registration processes and ensures payment of the determined expropriation value to the owners and shareholders. The registered title is transferred to KGM.
- Requesting Parcel Evacuation: As required, KGM formally requests the evacuation of expropriated parcels from the relevant authorities once the expropriation is complete.

The key responsibilities of the relevant KGM departments are outlined in Table 14-2.

Table 14-2. KGM's Roles and Responsibilities relevant to RAP

Role	RAP related Key Responsibilities
Department of Operations	• Monitor the implementation of Lenders' land acquisition requirements through periodic progress reporting • Provide support for audits related to the implementation of RAP measures and commitments • Inform the KGM Department of Immovables regarding additional expropriation needs that arise during Project execution • Review and approve design changes proposed by the SPV, including features such as overpasses, underpasses, culverts aimed at mitigating land fragmentation impacts or construction of structures such as retaining walls to avoid or minimise impacts on structures located outside but adjacent to the Motorway's expropriation corridor. • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP • Support the conduct of periodic RAP monitoring studies during implementation
Department of Immovables	• Coordinate with the KÖSOB to ensure land acquisition is implemented in full compliance with the Expropriation Law • Procure and allocate the budget required for the Project's expropriation activities • Ensure at least annual update of valuations • Monitor the overall progress of the land acquisition process • Approve expropriation costs in accordance with Article 8 of the Expropriation Law, ensuring they meet the Lenders' replacement cost standards and increase the rate of negotiated settlements with affected people • Support RAP monitoring and evaluation, including the tracking and documentation of implementation outcomes • Oversee and ensure resolution of land acquisition–related grievances • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP. • Support the preparation of the RAP, ensuring alignment with national legislation and Lenders' standards
KÖSOB	• Execute the responsibilities under the PPP Control Chief Engineering Unit • Implement the land acquisition process in accordance with the Expropriation Law, as outlined in the RAP • Determine expropriation costs in accordance with Article 8 of the Expropriation Law, ensuring they meet the Lenders' replacement cost standards and increase the rate of negotiated settlements with affected people • Process expropriation payments to eligible right holders and beneficiaries in coordination with the KGM Department of Immovables Review • Oversee the RAP implementation by the SPV's RAP implementation team, including management of grievances • Collaborate with the SPV's RAP implementation team to ensure the posting of the inventory of assets and disclosure of cut-off date notices in affected settlements • Provide feedback on brochures and other informational materials prepared by the SPV for public and stakeholder engagement • Manage land-acquisition related grievances and oversee processes related to Project impacts, and legal rights • Share up-to-date data with the SPV concerning the status of expropriation activities, ongoing court cases, and other relevant land acquisition details to support land access planning and construction scheduling. • Coordinate land acquisition process involving state-owned and legal entity-owned parcels in collaboration with the SPV, when necessary. • Collect, evaluate, and address formal applications from landowners for the acquisition of orphan lands, in accordance with timeframes stipulated by the Expropriation Law. • Manage land acquisition-related grievances in line with their established institutional procedures, including receiving, evaluating, and responding to grievances and feedback from affected people. • Issue written notifications to the SPV regarding requests or issues requiring the SPV's action – such as integration of design modifications or construction-related considerations; monitor and confirm the implementation of these actions. • Review official correspondence and monthly construction progress reports submitted by the SPV, including updates on RAP implementation progress; provides timely feedback or instructions to the SPV as appropriate. • Participate in both regular and ad hoc meetings with the SPV, during which the SPV consults KGM, as necessary, on matters related to the preparation, ongoing implementation, and future phases of the RAP. • Support the preparation and implementation of the RAP, ensuring alignment with national legislation and Lenders' standards

14.3. SPV – RAP Implementation Team

Land acquisition in accordance with the Expropriation Law is the responsibility of KGM. On the other hand, the SPV holds contractual responsibilities for covering a portion of the Expropriation Cost and acquiring land use rights and permits for temporary or permanent facility sites, where such sites are located outside the Project's expropriation corridor.

The SPV is responsible for implementing this RAP in collaboration with KGM. In consultation and agreement with KGM, the SPV will lead the implementation of RAP measures, including livelihood restoration, support to vulnerable groups, compensation for informal users, stakeholder engagement and consultation, monitoring and reporting of RAP implementation progress, and budget (RAP Fund) allocation and disbursement for RAP-related activities (as detailed in Chapter 16).

The SPV will allocate and manage a RAP Fund to finance the costs associated with the implementation of RAP measures that are not covered under national legislation, as well as to provide for the human resources required to ensure effective implementation.

RAP Implementation Team

In accordance with the **Project's E&S Resourcing Plan**, the SPV has started establishing, and will maintain and strengthen an organisational structure that defines roles, responsibilities, and authority for implementing the Project's ESMS, and will require the EPC Contractor and the potential O&M Contractor to do the same. The specific personnel profile, including clear lines of responsibility and authority, is defined in the E&S Resourcing Plan, along with the key E&S responsibilities, which will be communicated to the relevant personnel and to the wider Project organisation. Sufficient management support, and adequate human and financial resources, will be provided on an ongoing basis to ensure effective and continuous E&S performance.

Under the overall ESMS organisation of the Project, the SPV will assign a dedicated RAP Implementation Team responsible for the day-to-day delivery of RAP measures in collaboration with KGM, as provided in Figure 14-1.

The team will be led by SPV's E&S Manager (already recruited) and include a Resettlement Specialist (already recurited) and two CLOs (already recruited). These roles will be supported by SPV's Senior E&S Specialist (already recruited), and site teams, as appropriate.

The core team will be supported by both in-house teams (design, construction, finance, and legal teams) and third-party implementation partners and consultants, as needed.

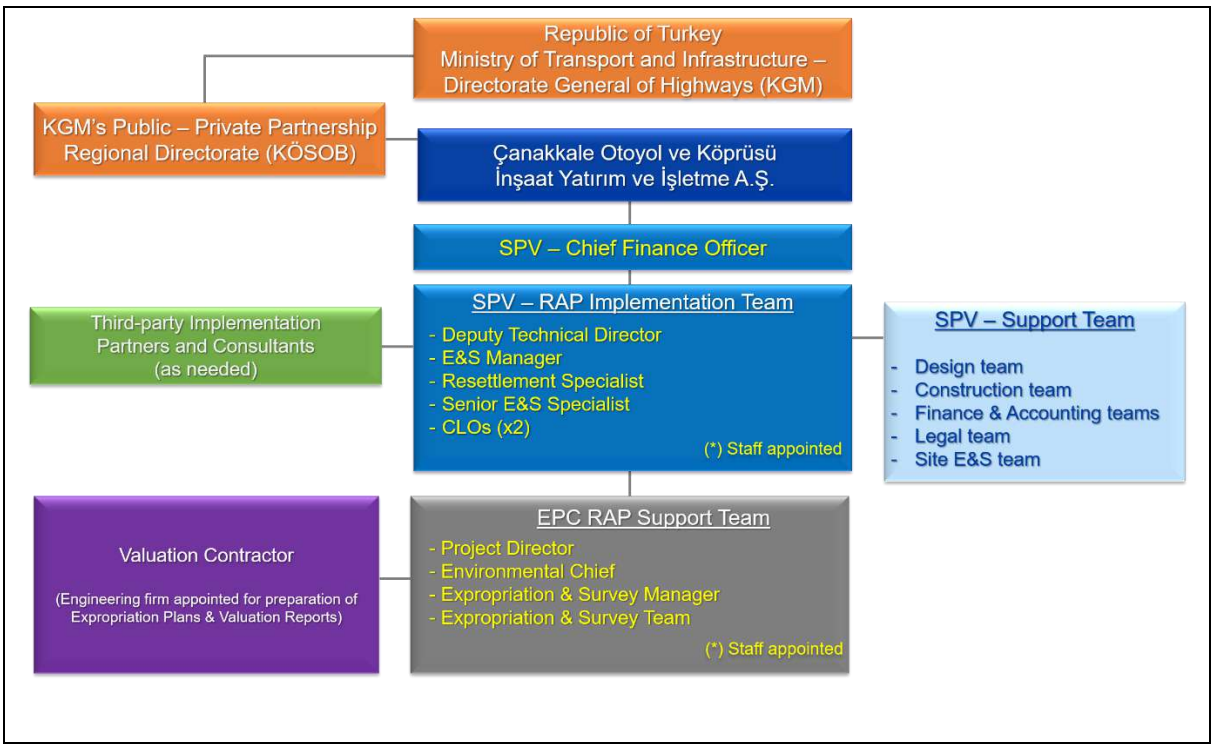

Figure 14-1. General Project Organisation and the RAP Implementation Team Structure

Roles and Responsibilities of the RAP Implementation Team Members

The roles under the RAP implementation team and their key responsibilities for RAP implementation are outlined in Table 14-3. **The implementation of the RAP and LRP will be subject to the overall oversight and high level coordination of the RAP Executive Committee described in Section 14.7. Day-to-day coordination of RAP and LRP implementation, including coordination of the roles and responsibilities assigned to the relevant parties, will be led by the E&S Manager.**

Table 14-3. Key Roles and Responsibilities of the RAP Implementation Team Members

Role	Responsibilities
Corporate Management	
Senior Management Representatives in the SPV (i.e. SPV's Chief Finance Officer)	• Coordinate with KGM as required to support the effective implementation of the RAP. • Review and internally approve the RAP, including all relevant components such as entitlement frameworks, implementation costs (RAP Fund), and timeframes, as well as any necessary updates. • Conduct periodic reviews of RAP implementation based on reports submitted by the Project Management. • Serve as the decision-maker on specific RAP implementation matters, if required or requested by the SPV and EPC RAP teams. • Undertake engagement with Lenders and their LESA on specific RAP implementation matters and progress. • Allocate the financial resources necessary for RAP implementation.
SPV – Management	
Deputy Technical Director	• Represents Senior Management • Ensure that measures for the avoidance and/or minimisation of displacement impacts are considered during Project design and implemented on site, where feasible; communicate such measures to Corporate Senior Management Representatives for further discussion with and approval by KGM. • Lead the communication and coordination with the KGM, represented by the KÖSOB, and the Lenders and the LESA. • Organise monthly coordination meetings during construction phase between the SPV and KÖSOB • In coordination with the E&S Manager, ensure that the EPC Contractor and subcontractors are fully aligned with the RAP through relevant contractual provisions. • Review and approve the RAP related information to be shared with the KGM, Lenders, and affected parties. • Manage the financial resources allocated by the Senior Management for RAP implementation.
SPV – RAP Implementation Team	
E&S Manager	• Lead the SPV's RAP Implementation Team and oversee the day-to-day implementation of the RAP in coordination with SPV – Deputy Technical Director, the Resettlement Specialist, CLOs and other relevant in-house support teams. • Support the SPV – Deputy Technical Director in communication and coordination with the KÖSOB, and the Lenders and the LESA. • Coordinate and supervise third-party RAP implementation partners and consultants for effective RAP implementation. • Ensure the development and implementation of specific RAP compensation packages and livelihood restoration and improvement projects in coordination with the RAP Implementation Team experts and third-party implementation partners and consultants. • Act as the custodian of the Project-specific SEP, including the grievance mechanism, and ensure its documentation and regular updates. • Coordinate Project CLOs to ensure effective outreach to vulnerable members of affected communities. • Steer establishment of a dedicated Project Grievance Database; ensure that all land acquisition-related grievances and feedback are recorded by the Project CLOs, separate from other project grievances. • Review and convey land acquisition-related grievances and feedback from affected people to KGM in writing, through periodic (e.g. monthly) progress reports or on a case-by-case basis, if collected by the SPV through the Project grievance mechanism. • Decide on appropriate measures and actions for land-related grievances to be managed internally by the SPV, with support from the Resettlement Specialist, CLOs, and relevant Project departments. • Manage other RAP related social and human rights impacts identified in the ESIA, in accordance with the SPV's relevant management plans. • Organise preparation and delivery of training sessions necessary for effective RAP implementation. • Periodically review and evaluate the capacity of teams and experts involved in RAP implementation and inform the SPV – Deputy Technical Director and Corporate Senior Management Representatives in the SPV of any capacity-building needs. • Provide input to Project's social media strategy in collaboration with relevant support teams. • Report regularly to the SPV – Deputy Technical Director and Corporate Senior Management Representatives in the SPV on RAP implementation progress and challenges. • Coordinate both internal and external RAP monitoring and reporting activities and ensure

Role	Responsibilities
	preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders.
Resettlement Specialist	• Ensure day-to-day implementation of the RAP in coordination with SPV – Deputy Technical Director, the E&S Manager, CLOs and other relevant in-house support teams. • Act as the interface between the SPV and EPC expropriation teams to follow up on and coordinate matters related to expropriation, court cases, land entry processes, and other related activities. • Provide support to the E&S Manager in reviewing and managing land acquisition-related grievances, including the identification of responsible internal and external parties for their resolution. • Obtain and review grievances and requests managed directly by KGM and convey the relevant information to the E&S Manager for integration into the Project's Grievance Mechanism and Grievance Database. • Compile monthly land acquisition progress reports and submit them to the E&S Manager for integration into the periodic Project reports submitted to KGM and Lenders by the SPV. • Review decisions issued under Article 27 and Article 10 court processes in coordination with EPC Expropriation Teams, including valuation amounts and set-off requirements; identify and report any cases where land seizure values are reduced by the courts at the conclusion of the Article 10 process to SPV – Deputy Technical Director, E&S Manaher and Corporate Senior Management Representatives. • Guide and support affected people in completing administrative tasks associated with land acquisition and resettlements, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices) • Organise periodic RAP coordination meetings between the KÖSOB, SPV and EPC
Senior E&S Specialist	• Support the E&S Manager in the implementation of the RAP • Carry out RAP related responsibilities delegated by the E&S Manager
CLOs (male and female)	• Support the day-to-day implementation of the RAP activities and measures on site. • Lead the daily on-site implementation of the RAP Disclosure and Engagement Action Plan (as outlined in RAP Section 10.3) and the Project Grievance Mechanism, along with the implementation of the broader Project SEP, under the supervision of the E&S Manager and Resettlement Specialist • Engage directly with affected people to implement RAP measures and actions, including regular community visits, calls, or other forms of communication, ensuring affected people are informed of their rights under national legislation and the RAP. • Establish and maintain a comprehensive database of all affected people, including physically and economically displaced households, individuals with vulnerabilities, and formal and informal users of affected parcels. • Ensure inclusive outreach to vulnerable groups and women under RAP implementation through dedicated sessions. • Guide and support affected people in completing administrative tasks associated with resettlement, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices). • Mediate issues between affected people and Project; forward community questions and concerns to the appropriate government authorities and the Project and corporate management representatives. • Maintain the Project's Grievance Database by accurately recording all land acquisition-related grievances and feedback received through various channels, ensuring it remains distinct from other project-related grievance records. • Ensure all grievance registered are forwarded to the E&S Manager or relevant departments for resolution, and properly closed out in compliance with the SEP. • Maintain detailed and accurate records of all engagement activities, including meeting agendas, minutes, and follow-up actions, in coordination with other experts. • Prepare and distribute communications material – such as brochures, reports, letters, and notifications – with approval from SPV Deputy Technical Director, E&S Manager and Expropriation Manager, as relevant. • Ensure registering of incoming documentation from both internal and external parties by relevant Project parties. • Identify site implementation problems and bottlenecks related to RAP and stakeholder engagement and report them to the SPV Deputy Technical Director, E&S Manager and Resettlement Specialist, as relevant. • Contribute to both internal and external RAP monitoring and reporting activities and preparation of periodic Project reports, incorporating RAP implementation data, for submission to KGM and Lenders. • Coordinate and supervise EPC teams to ensure alignment and consistency across all engagement efforts. • Guide and support affected people in completing administrative tasks associated with land acquisition and resettlements, such as submitting applications (online or in person) for permits, licenses, or utility services; completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices).

Role	Responsibilities
Support Team[123]	• Remain available to provide ongoing support to the RAP Implementation Team throughout the RAP implementation period. • Support the establishment of the RAP Implementation Team by preparing job descriptions, participating in candidate interviews, and assisting with recruitment processes. • Conduct necessary surveys and assessments, both site-based and desktop, for affected structures and buildings. • Review official documentation of affected businesses to inform compensation and/or assistance for temporary business interruptions; this may include, but is not limited to, financial records (e.g. net income statements, salary records), licenses, and permits.
EPC Contractor – Support Team	
EPC Expropriation Team	• Act as the interface between the SPV and the expropriation teams of the KGM to follow up on and coordinate matters related to expropriation, court cases, land entry processes, and other related activities. • Ensure daily coordination with the KÖSOB and alignment between the expropriation process and the implementation of the RAP. • Coordinate the work of other expropriation engineers employed under the Project. • Coordinate the expropriation plan production works carried out by the national engineering firm (valuation contractor). • Obtain and review grievances and requests managed directly by KGM and convey the relevant information to the SPV E&S Manager and Resettlement Specialist for integration into the Project's Grievance Mechanism and Grievance Database. • Monitor and track decisions issued under direct Article 10 and Article 27 (followed by Article 10) court processes in coordination with KGM, including valuation amounts and set-off requirements; identify and report any cases where land seizure values are reduced by the courts at the conclusion of the Article 10 process to SPV – General Manager and Corporate Senior Management Representatives • Guide and support affected people in completing administrative tasks associated with land acquisition, such as submitting applications (online or in person); completing legal and official forms; and coordinating logistical support for visits to relevant institutions (e.g. authorities, banks, notaries, land registry offices).
EPC Contractor – Environmental Chief	• Ensure implementation of all RAP-related actions delegated by the SPV through the EPC Contract and subcontractor agreements. • Maintain an organisational structure that aligns with the SPV's E&S structure, including clear roles, responsibilities, and reporting lines. • Implement the E&S commitments outlined in the ESIA, SEP, ESMP, and other specific management plans incorporated in the EPC Contract, to avoid and/or mitigate construction-related impacts on affected people and their livelihoods; allocate adequate financial and human resources for effective implementation of those avoidance and mitigation measures. • Continuously explore opportunities to avoid or minimise adverse impacts during construction and propose feasible measures to the SPV – E&S Manager. • Ensure signing proper consent or lease agreements for lands that will be used temporarily during construction. • Reinstate and return temporarily used land to its original condition and hand it back to the owners upon completion of use. • Make payments for standing crops on parcels to be entered – if any – where land entry cannot be delayed until the harvesting season. • Compensate for any verified damage or spillages to neighbouring (non-expropriated) lands or for damage to standing crops on lands not formally included in the Project footprint. • Provide compensation for verified livelihood losses resulting from EPC Contractor activities. • Reinstate any damages to public or private infrastructure and services caused by EPC Contractor activities, once verified. • Ensure that any land acquisition-related grievances or feedback received by the EPC Contractor or subcontractors are recorded in Project's Grievance Database maintained by the SPV, and addressed in coordination with the SPV in line with the Project SEP.

[123] The Support Team may include Design, Construction Finance, Legal, Accounting, Permitting, Human Resources (HR), Administrative, Public Relations teams among others.

Roles and Responsibilities of the Third-party RAP Implementation Partners and Consultants

The support to be provided by the in-house and external support personnel, specialists or consultants is summarised in Table 14-4.

Table 14-4. Key Roles and Responsibilities of the Third-party RAP Implementation Partners and Consultants

Role	Specific Requirements	Framework of the Support
Implementation Partner – RAP Implementation and Monitoring Consultant	• Adequate RAP implementation experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• Provide consultancy and support to SPV – RAP Implementation Team to ensure alignment with IFC PS5. • Guide and advise the SPV on the timely and effective execution of actions specified in the RAP. • Support the SPV in establishing and maintaining a RAP monitoring database consistent with the monitoring indicators defined in the RAP. • Assist the SPV in conducting internal monitoring and reporting activities in accordance with the monitoring indicators and reporting frequencies specified in the RAP. • Monitor the relocation processes and confirm successful re-establishment of houses and businesses. • Review documentation related to ongoing land acquisition and resettlement activities – including stakeholder engagement and grievance management – to identify any gaps or areas for improvement and advise on corrective actions to ensure compliance with the RAP. • Provide guidance to the SPV in responding to any requests for action issued by the Lenders and LESA. • Provide support to the SPV as needed before and/or during the RAP Completion Audit.
Third-party Valuation Expert	• Has agricultural engineering or economy background and expertise in valuation of agricultural properties using net income method • Specialised in valuation • Available to provide support on an ongoing basis as needed throughout the RAP implementation	• Review each affected house, and business to determine the amount of the RAP compensation package to be provided to each affected party in consultation with them. • Support the SPV in reviewing specifics of tenancy agreements to determine case-by-case provisions that may require compensation by SPV, as needed • Decide on how the packages will be delivered to the affected business owners, whether at once (one-off cash compensation) or based on milestones. • Provide third-party evaluation and opinion regarding the requests, claims, or objections raised by affected people on matters related to expropriation and valuation (such as income loss due to land fragmentation, insufficient compensation for structures, trees, orchards or crops) to prevent conflicts, especially where there is disagreement between owners and the SPV or KGM. • Review and determine necessary actions by the SPV regarding the implementation of the 1/1,000 scale Implementation Zoning Plan, including compensation for unacquired portions if they are rendered economically unusable or undevelopable. • Review the outcomes of expropriation cases under Article 10 and develop case-specific corrective actions where needed (e.g., in cases of decreased land seizure value).
Third-party Livelihood Implementation Partner– External Agricultural Consultants (Recommended team composition: **1 part-time** LRP implementation coordinator + **3 full-time** field-based LRP implementation officer)	• Adequate relevant experience • Available to provide at least 36 months on-going support to the RAP Implementation Team	• See Table 8-12 under Chapter 8 “Livelihood Restoration Plan”.
Valuation Contractor	• Specialised in valuation • Available to provide support as needed	• Update or prepare valuation studies for approval by KGM in cases of land acquisition extending beyond 2025 or for any future additional land acquisition requirements of the Project. • Conduct detailed valuation of fixed investments made at affected houses, business premises, and similar structures, as well as those to be made at replacement sites, including associated costs for assembly, disassembly, and relocation.

14.4. Public – Private Partnership Regional Directorate (KÖSOB)

In order to carry out the construction and operation activities related to the Gebze–Orhangazi–İzmir Motorway Project (including the İzmit Gulf Crossing and connecting roads), which was constructed under the Build–Operate–Transfer (BOT) model and fully opened to traffic on 5 August 2019, a **Public – Private Partnership Regional Directorate** (**KÖSOB** – *Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü*) was established by KGM on 29 March 2011 under the provincial organisation, headquartered in Bursa Province.[124]

The Project falls within the responsibility area of the KÖSOB. The structure of this implementation unit, as officially approved by KGM on 31 December 2024, is presented in Figure 14-2.

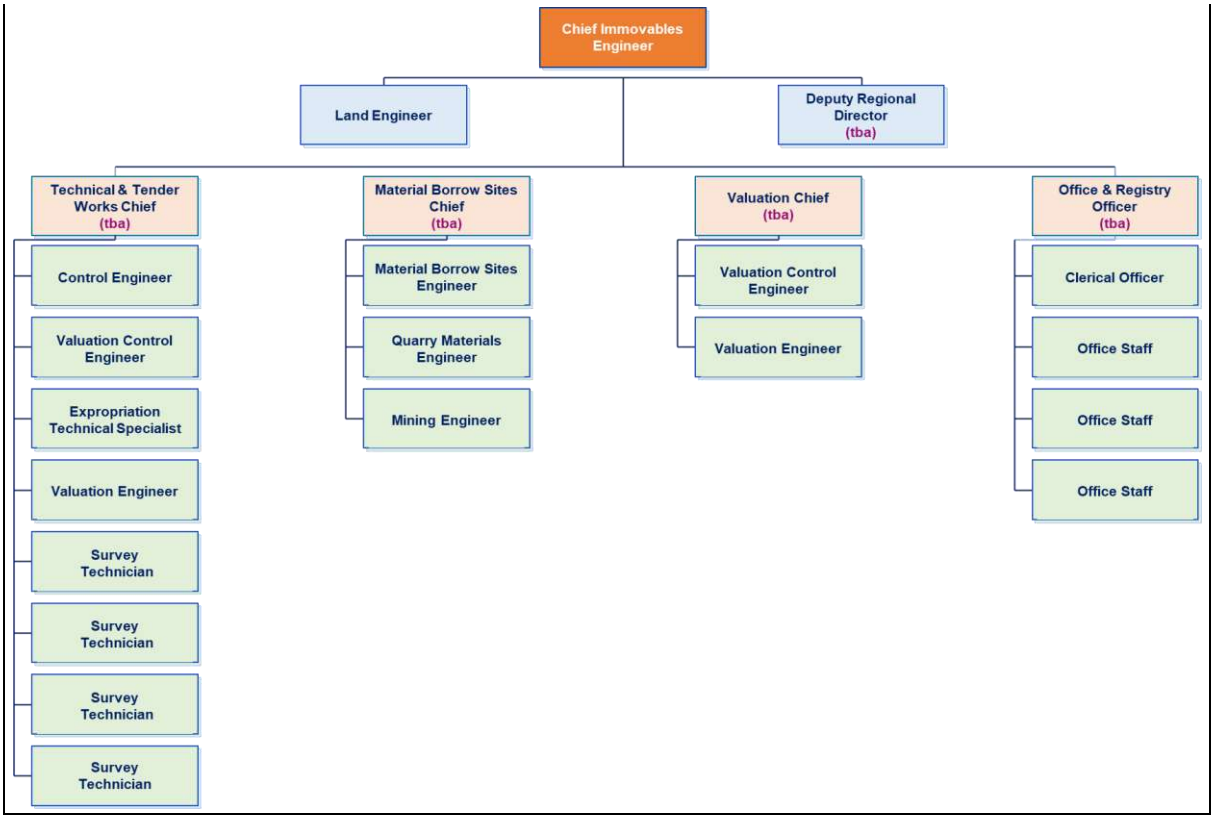

Figure 14-2. KÖSOB Organization Chart

(*) **tba**: to be assigned

For daily Project management issues, the SPV coordinates and collaborates closely with this Unit. In line with the BOT contract requirements, this Unit serves as the SPV's direct contractual counterpart under the BOT Implementation Contract. KÖSOB will have a **site office at the main construction camp site**, which will enable close collaboration on Project management, including expropriation-related matters and RAP implementation.

The SPV's E&S Manager and the EPC's Expropriation Manager are responsible for ensuring daily coordination with KÖSOB and alignment between the expropriation process and the RAP principles.

[124] https://www.kgm.gov.tr/Sayfalar/KGM/SiteTr/Bolgeler/KamuOzel/KamuOzel.aspx

Periodic Coordination Meetings between KÖSOB and the SPV

In addition to the daily communication between the SPV and the KÖSOB, coordination meetings will be held at least monthly during the construction phase, with the participation of the KÖSOB, the SPV, and the EPC Contractor, to ensure close collaboration between the parties for the effective implementation of the RAP.

The agenda of these meetings will be as follows:

- Project governance structure, including E&S capacity
- Project progress
- Expropriation programme and progress, including ongoing valuation processes, Article 8 negotiations and agreements, and legal proceedings under Article 10 and Article 27, if any
- RAP implementation by SPV, including management of physical and economic displacement impacts and delivery of RAP entitlements
- Engagement with stakeholders, including affected communities and people, by KGM and SPV
- Grievance management
- Status of ongoing valuation studies by valuation contractor
- Facilitation or support required from KÖSOB for the implementation of the RAP.

The agenda of each meeting will be tailored to the specific needs arising as the Project progresses.

The SPV's E&S Manager, in consultation with KÖSOB and SPV's Senior Management, will undertake the following tasks:

- Determine the location, agenda and participants of the **monthly** coordination meetings,
- Ensure that minutes of the monthly coordination meetings are kept and distributed to all parties.
- Coordinate and monitor completion of the actions (if any) decided in monthly meetings by responsible parties within agreed timeframes

14.5. Coordination between KGM and SPV in case of Article 27 Court Proceedings

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

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

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

- As the Project progresses, **KGM will update the valuation rates for land and assets on an annual basis** as outlined in Section 6.3.4.

- For ongoing and future expropriation process, KGM will continue prioritising purchase method (Article 8) through negotiated settlement over Article 27. Prior to conducting Article 8 consent negotiations in accordance with the Expropriation Law, **the SPV – working in coordination with KGM Regional Directorate's chief engineering department for immovable properties – will inform the landowners, shareholders, and/or heirs of the affected parcels about the land acquisition process and their legal rights under the Expropriation Law**. This will include information on:

    - the steps heirs must complete to access their legal rights,
    - the support and entitlements to be provided by the SPV from the RAP Fund (in addition to the expropriation compensation to be provided by KGM),
    - and other relevant aspects of the process.

  To support this information process, the SPV will distribute printed copies of KGM's booklet on procedural steps of expropriation in affected settlements (Appendix I).

  GLAC has been prepared by the SPV in both English and Turkish. The GLAC will provide a concise, clear, and non-technical summary of the RAP. Following their approval by the Lenders, **the GLAC was disclosed[125] on the Project's website in Turkish and in English. The SPV will distribute and present the GLAC to affected people** to ensure they are fully informed about the land acquisition process – including the Article 8 process and legal procedures under Article 10 and 27 – their rights under the Expropriation Law, as well as the RAP's eligibility criteria and entitlements.

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

- As part of the Article 27 court processes, **the SPV will follow up on the deposit of land seizure and/or expropriation compensation into the bank accounts** of parcel owners and heirs. KGM will be consulted to ensure that this process is completed within a reasonably short timeframe.

- **The SPV will seek to inform all previously identified owners and heirs of the parcels about the court decisions,** and provide guidance regarding the, the requirement to complete inheritance certificates in order to withdraw the deposited compensation, the availability of SPV support for payment or reimbursement of related expenses through the Small Costs Fund and subsequent steps of the process – including the provision of Full Replacement Cost from the RAP Fund to compensate for depreciation applied solely in the valuation of buildings/structures.

- Within the scope of the Article 10 court processes that will follow Article 27, **the SPV, in collaboration with KGM, will monitor the title deed registration and bank transaction procedures related to the owners, shareholders, and heirs of the parcels,** in order to verify that these processes are proceeding smoothly and without undue delays.

- **The SPV will monitor and track the outcomes of Article 27 and Article 10 court decisions in collaboration with KGM –** including valuation amounts and any set-off requirements determined at the conclusion of each process. In the event such cases arise, the SPV will identify them and develop corrective actions on a case-by-case basis, to be implemented in consultation with and subject to the agreement of the Lenders, as required.

[125] Turkish: 1915canakkale.com/cmsfiles/Galleries/18348/cok-arazi-edinimi-ve-tazminat-kilavuzu-aetk.pdf; English: 1915canakkale.com/cmsfiles/Galleries/18348/cok-guide-to-land-acquisition-and-compensation-glac.pdf

14.6. Potential Parties for Collaboration

The related authorities and third parties that may be involved in the development and implementation of detailed livelihood restoration, improvement, and assistance measures are listed in Table 14-5.

Table 14-5. Potential Parties for Collaboration

Party	Stakeholders
Ministries (including affiliated institutions) – through their provincial and district level representations and related affiliations	- Ministry of Agriculture and Forestry - Ministry of Environment, Urbanisation and Climate Change - Ministry of Family and Social Services - Ministry of Labour and Social Security - Ministry of National Education - Turkish Employment Agency – Istanbul Provincial Directorate & Tekirdag Provincial Directorate
Affiliated institutions of the Ministries	- Land Registry Offices in Silivri district İstanbul and Marmaraereğlisi, Çorlu, Süleymanpaşa and Malkara districts in Tekirdag
Governorates	- Istanbul and Tekirdag Provincial Directorates of Agriculture and Forestry - District Directorates of Agriculture and Forestry -
District Governorates	- District Governorate of Silivri - District Governorate of Marmaraereglisi - District Governorate of Corlu - District Governorate of Suleymanpasa - District Governorate of Malkara -
Municipalities	- İstanbul Metropolitan Municipality - Tekirdag Metropolitan Municipality - Silivri District Municipality - Marmaraereglisi District Municipality - Corlu District Municipality - Suleymanpasa District Municipality - Malkara District Municipality
Settlements	- Heads of affected neighbourhoods (Section 5.2.3)
Professional Organisations	- South Marmara Development Agency - Silivri Chamber of Agriculture - Corlu Chamber of Agriculture - Suleymanpasa Chamber of Agriculture - Malkara Chamber of Agriculture
Universities	- Business management, agriculture, agricultural economics, etc. departments of relevant universities o Tekirdağ Namık Kemal Üniversitesi
Private Sector	- Resettlement professionals - Expropriation and valuation experts
Others	- Relevant Non-governmental Organisations (NGOs) and Civil Society Organisations (CSOs) – such as women-focused non-profit organisations, youth associations, and other community-based groups will be identified during RAP implementation.

14.7. RAP Executive Committee

The SPV has established a **RAP Executive Committee in July 2026** to facilitate the effective, timely and transparent implementation of the RAP and LRP, and provide oversight and coordinated decision-making for the RAP implementation, particularly the allocation and disbursement of RAP Fund resources, throughout the implementation period.

The RAP Executive Committee will provide overall oversight and high-level coordination of RAP and LRP implementation, while the E&S Manager will be responsible for day-to-day coordination and implementation of the responsibilities described under Table 14-3**.**

The **RAP Executive Committee** is composed of the following core members, with the option to include additional members as required:

- Corporate (Limak) Project Finance Director – Representative Board Member
- Corporate (Limak) Finance Director – Representative Board Member
- SPV – Chief Finance Officer (CFO)
- SPV – Senior Finance Manager Göksen
- SPV – Deputy Technical Director
- SPV – E&S Manager
- SPV – Legal Officer
- SPV – Resettlement Specialist
- EPC – Expropriation Manager

The RAP Executive Committee will hold periodic meetings, either remotely or in person, to review and decide on RAP Fund disbursement plans for the period up to the next meeting. During the early stages of RAP implementation, meetings are planned to be held **semi-monthly** (once every two weeks); however, the frequency may be increased or reduced depending on implementation needs. Through these meetings, the Committee will undertake the following key activities:

- review parcel-based RAP compensation packages calculated by the SPV's RAP Implementation Team and approve the related payments, where appropriate;
- consider implementation priorities and interfaces between RAP implementation, expropriation activities and the construction programme;
- receive updates on key RAP implementation matters;
- discuss matters requiring institutional coordination with KGM – KÖSOB and other relevant agencies;
- review cases involving PAPs who require case-specific assistance and prioritise measures to address their needs; and
- consider other ad hoc matters relevant to RAP implementation.

The first RAP Executive Committee meeting was held on 13 July 2026, with the participation of Committee members and the RAP Consultant, to brief the Committee on RAP implementation and planned activities, and to establish initial coordination.

In cases where Executive Committee members are unable to attend a meeting, they will delegate an authorised representative to attend on their behalf.

Meeting minutes and actions will be kept by the **SPV – E&S Manager** and circulated to Executive Committee members and other participants within three working days following each meeting.

In cases where no major items or disbursements are scheduled for discussion, the regular meeting may be substituted with correspondence.

15. Implementation Schedule and Change Management

15.1. Implementation Schedule

The overall Project Schedule is provided in Section 2.4 and summarised below. A general implementation schedule for RAP, is presented in Table 15-1.

- In March 2017, the **Implementation Contract (BOT Contract)** for the Project was signed between the **KGM** and **ÇOK A.Ş.,** as the **Appointed Company,** and the Project was officially inaugurated on March 18, 2022.
- The KM Section is intended to be included within scope of the Project Company's appointment under the Implementation Contract as an additional work to the MC Section. The Project Company and the KGM signed a **MoU** in September 2022.
- The original BOT Contract for the 1915 Çanakkale Motorway and Connection Roads defined a concession period of **16 years, 2 months and 12 days**, covering both construction and operation phases, after which the Motorway will be transferred to the Republic of Türkiye. According to the MoU concerning the KM Section Project, an extension to the Operation Period of the Malkara – Çanakkale Motorway totalling 1,650 days is granted to the Appointed Company.
- The Operation Period for the Kınalı – Malkara Motorway will commence on completion of the construction, which is defined as **36 months** following the financial close and will run in parallel with the remaining period of the Malkara – Çanakkale Motorway's operation period, ending at the same date.
- Based on the Detailed Work Schedule prepared by the SPV and approved by KGM on 20 March 2025, the expropriation process for the Project – including both expropriation payments under Article 8 and the deposit of land seizure fees under Article 27 – is planned to be carried out by KGM on a lot-by-lot basis. This will be aligned with the Project's construction schedule and subject to the availability of the expropriation budget. **The expropriation programme will be aligned with the construction schedule (36 months), subject to the availability of the expropriation budget and approval by KGM.**
- The **RAP implementation period will cover a duration of 36 months,** commencing from the approval of the final RAP by the Lenders. This period will encompass the entire construction phase (starting from the signing of the financing agreement) and may extend into the initial months of the commissioning and operational phase, if needed.
- Following the completion of RAP implementation period, **post-implementation monitoring will be conducted for up to two years**, until a **RAP Completion Audit** will be carried out – by external independent resettlement specialists – with approval from Lenders, as outlined in Section 13.2.2.

Table 15-1. General Implementation Schedule for RAP

No.	Tasks	2026				2027				2028				2029			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1.	**SPV and Lenders to sign Finance Agreement**																
2.	**SPV to complete RAP Implementation Team** assignment and contract implementation partners if any																
3.	**SPV to prepare RAP implementation documentation** (e.g. GLAC, RAP toolkits, monitoring etc.)																
4	**SPV to distribute the GLAC and commence RAP information meetings with affected people.**																
5	**KGM to complete expropriation procedures**																
	- **Section 1**																
	- **Section 2 (KM 58 – 60)**																
	- **Section 2 (remainder)** (tbd by KGM)																
	- **Section 3**																
6.	**SPV to implement RAP**																
	6.1. SPV to prepare a **parcel-based implementation schedule** in line with the expropriation and construction programme																
	6.2. SPV to complete the **PAP Database** for Land Acquisition (including vulnerable individuals)																
	6.3. SPV to prepare **parcel-specific RAP Compensation Packages** (incl. house and business relocation plans)																
	- **Section 1**																
	- **Section 2 (KM 58 – 60)**																
	- **Section 2 (remainder)** (tbd)																
	- **Section 3**																
	6.4. SPV to roll-out LRP implementation (see Section 8.7 for detailed implementation schedule)																
7.	**SPV to commence post-implementation monitoring**																
8.	**RAP Completion Audit** by external independent resettlement expert (tbd by the LESA and Lenders)																

Note: *Colors in this table are used for visual clarity only and do not carry semantic meaning.*

15.2. Change Management

The Project has a Change Management Procedure in place.

Changes may be triggered at various stages of the Project cycle and may arise from, but are not limited to, the following:

- Administrative or organisational changes at the KGM or Project level that affect Project and/or RAP implementation.
- Legislative changes or comments by regulatory bodies affecting Project implementation (e.g. new permitting processes).
- Schedule changes (e.g. delays due to land acquisition or expropriation, permitting, construction challenges, severe climate conditions, natural hazards such as floods, landslides, or earthquakes, or other technical, financial, legal, or administrative factors).
- Changes in construction methodologies.
- Engineering and design changes – subject to approval by KGM – that may require additional land acquisition beyond the currently defined expropriation corridor, either during construction or, in limited cases, after commissioning. Such changes may stem from:
    - Adjustments to the Project description or footprint (e.g. new temporary or permanent facilities).
    - Changes in the boundaries of the expropriation corridor due to the emergence of new E&S issues requiring additional measures beyond the current footprint (e.g. discovery of biodiversity features or cultural heritage assets).
    - Technical requirements during construction to ensure Motorway safety and stability (e.g. additional slope stabilisation at embankments, drainage infrastructure for surface runoff).
    - Requests from affected people for additional underpasses, overpasses, or culverts, provided these are technically and financially feasible.
    - Relocation of existing infrastructure belonging to other institutions (e.g. overhead transmission lines, gas pipelines).
    - Significant environmental or social impacts that may emerge during the operation phase.
- Other relevant considerations raised by stakeholders through the Project's grievance mechanism.
- Concerns raised by the public, stakeholders, or lenders.
- Results of field surveys, investigations, inspections, and monitoring.
- Requests from KGM, whether related to or beyond the above-listed factors.
- Unexpected issues arising under regular operation conditions
- Operation strategy changes

Change Management Procedure

The Change Management Procedure recognises that there may be varying degrees of change, and that the need for and scope of the E&S evaluation should be proportionate to the proposed change. Accordingly, three categories of change have been developed. These categories are adopted in the RAP as follows:

- **Category 1:** A change that is unlikely to result in moderate impacts and unlikely and/or possibly to result in negligible to minor displacement impacts on communities. Impacts associated with this change can be controlled through the existing measures outlined in the RAP. Subject to evaluation, the change can be accepted without the need for further assessment.
- **Category 2:** A change that is unlikely to result in major impacts, possibly to result in moderate displacement impacts and very likely to result in negligible to minor displacement impacts on communities. Impacts associated with this change may or may not have been covered by the RAP. An additional assessment study will be required to demonstrate the potential impacts of the change and to confirm that measures are either already presented in RAP, which can be controlled by good international practices or measures that can be extended or introduced to fully control and/or mitigate the potential impacts.
- **Category 3**: A change that is possibly to result in major displacement impacts and very likely to result in moderate to major displacement impacts on communities. Impacts associated with this change are not covered by RAP. An additional assessment (e.g. RAP Addendum) will be required to demonstrate the potential impacts of the change. In some cases, the changes and their impacts may require full public disclosure and might trigger significant changes in the existing RAP. Category 3 changes require approval from E&S Team.

The following steps, which are detailed in the Change Management Procedure will be applied for managing any changes in the Project that are relevant to the RAP. Figure 15-1 provides a flow chart of the Procedure.

Step 1 – Notification (using the Change Management Form included in Annex – 1 of the Procedure)

Step 2 – Screening

Step 3 – Scoping

Step 4 – Assessment

Step 5 – RAP Review and Revision

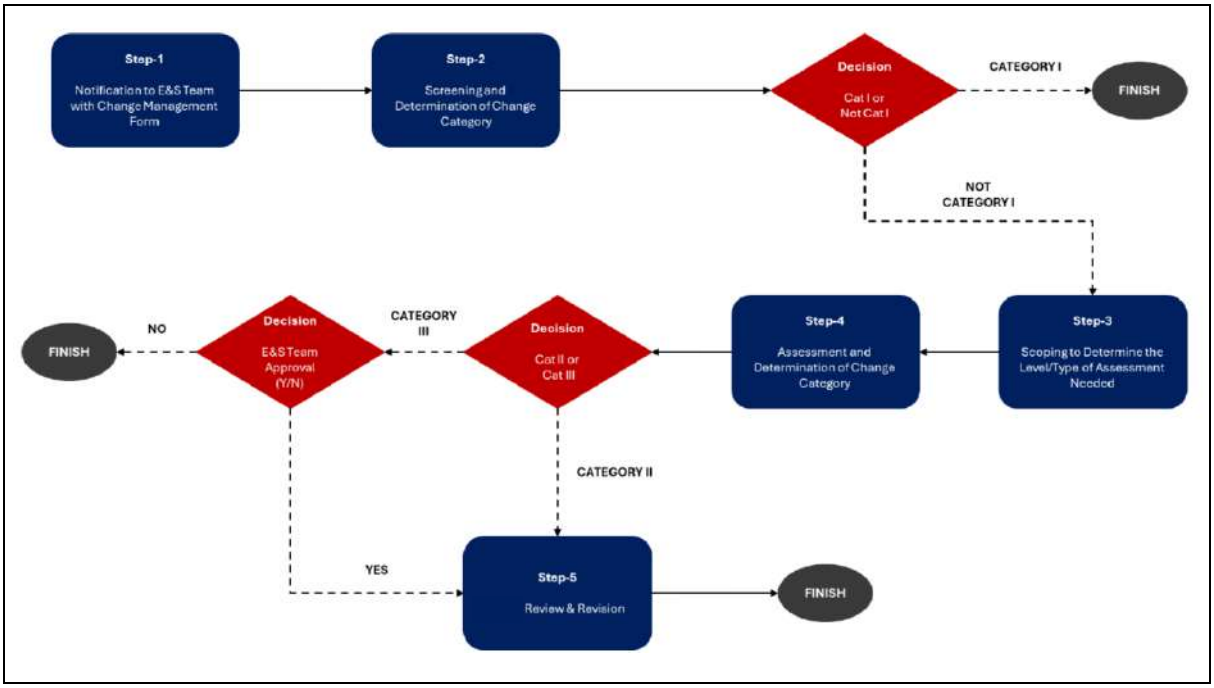

Figure 15-1. Change Management Process according to Project's Change Management Procedure

16. Budget

In accordance with the Expropriation Law, expropriation activities are carried out by KGM. The respective responsibilities of KGM and the SPV are outlined in the BOT Contract.

These responsibilities and cost allocations are governed by the provisions of the BOT Contract – Clause 13.

- The total expropriation cost for the Project is estimated by the KGM.
- The portion of the Expropriation Cost related to the Motorway construction, amounting to approximately **EUR 32,000,000.00**, **shall be borne by the Appointed Company**.

  The Appointed Company is required to pay this amount to the Administration on the date of first utilisation under the financing procedure for the Project. After such payment is made, the Appointed Company shall no longer have any payment liability regarding the Expropriation Cost of the Project.
- **Any Expropriation Cost exceeding this amount shall be covered by the Administration – KGM,** in accordance with Clause13 of the BOT Contract.

As the BOT Contract does not include provisions for land acquisition-related costs beyond expropriation – such as livelihood restoration, assistance to vulnerable groups, compensation for informal users, and monitoring including external compliance reviews and a RAP Completion Audit – **these expenses will be borne by the SPV through a dedicated RAP Fund.**

The RAP Fund will be allocated and managed by the SPV, separately from the Project's Expropriation Budget (also referred to as mandatory cash compensation to be provided by KGM). All costs associated with additional measures not covered under national law, as well as the human resources necessary for the effective implementation of the RAP, shall be covered through the RAP Fund.

The indicative budget for RAP implementation through the RAP Fund is presented in Table 16-1.

This budget has been developed based on a conservative estimate and is aligned with the entitlements defined in Section 7.3. The FX rate used in calculating the euro equivalent of the budget values is consistent with the financial model.

During implementation, the required funds for expropriation (to be provided by KGM) and RAP implementation (to be provided by the SPV) may fluctuate within the overall budget due to changing market conditions. If such adjustments become necessary, the respective budget allocations of KGM and the SPV shall be revised in line with their roles and responsibilities as defined in the BOT Contract. The RAP Fund may be updated by the SPV during RAP implementation as necessary to reflect actual implementation needs, updated cost estimates, inflation, changes in the number of eligible PAPs, or other Project-related developments.

As shown in Table 16-1, the RAP Budget allocated by the SPV includes a **contingency fund amounting to 5%** of the total budget (excluding the contingency itself) to cover any unforeseen costs that may arise during RAP implementation.

Examples of potential contingency items that may trigger the utilisation of this fund are listed below:

- Compensation for claims, if deemed valid by the third-party valuation expert to be commissioned by the SPV during RAP implementation, related to full replacement cost, non-residential or secondary structures (for example, structures built before the cut-off date but not included in the inventory of assets, damage to crops on unacquired parcels) or structures without evidence of ownership.
- Preparation of RAP documentation and provision of entitlements for potential future expropriation works, in case they are not funded separately. These may include final design modifications (subject to KGM approval) or displacement of existing infrastructure belonging to other institutions (e.g., energy transmission lines, water and wastewater networks, natural gas pipelines) if such modifications require additional expropriation for specific parcels. All such cases will be subject to further evaluation and decisions by KGM, Lenders, SPV, and other relevant institutions.
- Additional compensation that may be required in the future for cumulative impacts identified through further studies or RAP monitoring or for unacquired land if it is determined to be economically unusable or undevelopable by a third-party valuation expert – as the exact number of parcels and households subject to those impacts can only be identified through the field-based studies conducted during RAP implementation.
- Additional support measures beyond those defined in the Entitlements Matrix that may become necessary during Project implementation (e.g. additional support to be provided to PAPs where the early notification timeframes cannot be met).

Detailed calculations for selected RAP budget items are provided following the table.

Table 16-1. Indicative RAP Fund Items

Budget Items	Budget (EUR)
(0) KGM – Expropriation Budget (Statutory Cash Compensation under Expropriation Law)	233,436,747.00 [126]
(A) Lands	
(B) Affected structures *(houses, non-residential structures, other fixed investments/improvements)*	
(C) Trees	
(1) SPV – Expropriation Budget borne by Appointed Company	**32,000,000.00**
(0) + (1) – Project's Total Expropriation Budget	**265,436,747.00**
(2) SPV – RAP Fund Items	
(A) Cash Compensation to cover Replacement Cost for owners of Informal **Structures** on public or private lands	112,262.41
(B) Affected Lands (1) Top-up Cash Compensation to cover Depreciation Cost of non-residential structures on affected lands (for structure owners) (2) Cash Compensation for Transaction Costs (3) Crop Payments (as needed) (4) Compensation for Value or Income Loss for Orphan Lands (5) Costs related to affected assets (land preparation for new site, permit renewal, damage to crops due to construction, etc.) (6) LRP (covered under RAP Fund – Item F)	1,264,537.77
(C) Affected Residential Structures (Houses) (1) Top-up Cash Compensation to cover Depreciation Cost of houses and structures (for structure owners) (2) Top-up Cash Compensation to cover Replacement Cost of houses and structures on private-lands in co-ownership status (for structure owners, who are the actual residents in the affected house) – if needed depending on KGM's compensation process (3) House Relocation Support Package (4) Moving Allowance (5) LRP (covered under RAP Fund – Item F)	504,785.36
(D) Affected Businesses (1) Top-up Cash Compensation to cover Depreciation Cost of business structures (for structure owners) (2) Business Relocation Support Package (3) Moving Allowance (4) Cash Compensation to Cover Cost of Fixed Investments (for formal and informal tenants) (5) Post relocation Income Support (6) LRP (covered under RAP Fund – Item F)	400,002.87
(E) Affected Special-use Assets (1) Top-up Cash Compensation to cover Depreciation Cost of special-use structures (for structure owners) (2) Relocation Package	119,809.72
(F) Livelihood Restoration Plan (LRP) Fund (1) Package 1 - External Agricultural Consultancy Support (through Livelihoods Implementation Partners) (2) Package 2 - Agricultural Training Programmes and Livelihoods Diversification (3) Package 3 - Activity-specific LRP Support Packages (4) Package 4 - Transitional Rental Support to Land Users for Replacement Land (5) Package 5 - In-kind Livelihoods Assistance (through Minor Works and Equipment Provision) (6) Package 6 - Priority in Project Employment	4,058,987.66
(G) Vulnerable Groups Fund	1,044,389.52
(H) Small Costs Fund	97,200.00
(I) Governance & Administrative Costs (1) Human Resources (Rap-specific Recruitment) (2) Equipment and Materials (mobile vehicles, printing, mobile phones, software) (3) RAP-specific Consultancy and Contractors (RAP implementation partners, third-party valuation experts, other consultancy)	522,000.00
(J) External RAP Monitoring (1) Periodic Post Financial Close Monitoring by LESA (included under Project's budget) (2) RAP Completion Audit	250,000.00
Total (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H) + (I) + (J)	8,373,975.33
Contingency (**5%**)	418,698.77
Grand Total (including contingency)	**8,792,674.09**

[126] The current total expropriation budget for the Project was estimated by KGM at TRY 14,100,000,000. Based on the indicative exchange rate published by the Central Bank of the Republic of Türkiye (TCMB) on 25 May 2026 (EUR 1 = TRY 53.12, buying rate), this corresponds to approximately EUR 265.4 million, including the part of the expropriation cost to be borne by the SPV (EUR 32 million). The total expropriation budget may be subject to revision following the valuation studies for the Section 2 (KM 35 – 70).

Transaction Costs Item under RAP Fund

In Türkiye, there are two main types of **transaction costs** associated with real estate purchases:

- **Title deed fee** (*tapu harcı*): A statutory transfer tax calculated as **4%** of the declared property value. The fee is applied as 2% of the sale price for each party, amounting to a total of 4%. The title deed fee is paid to the **Tax Office** by the responsible party, and a receipt is issued as proof of payment. In practice, it is often observed that the seller does not pay their share of the title deed fee, and the **entire amount (%4) is paid by the buyer**. Therefore, it can be assumed that landowners whose plots or agricultural land are expropriated along the Project route will bear the full title deed fee when making a new real estate investment. The tax base for the title deed fee is obtained from the real estate departments of the relevant **municipalities** within metropolitan boundaries.

- **Revolving fund fee** (*döner sermaye bedeli*): A fixed administrative fee payable by the buyer to the **Land Registry Office** per transaction. The buyer is solely responsible for paying the revolving fund fee related to the title deed transaction. Although it varies by district Land Registry Office, it is appropriate to consider the upper limit of the revolving fund fee as **TRY 6,350** for 2026.

In cases of multiple ownership, the transaction costs of the actual land users, who are landowners, will be covered by the SPV through the RAP Fund.

Transaction Cost Calculation

As land unit values vary by district, calculations were carried out separately for each district, taking into account the privately owned land areas expropriated for the Motorway within each district boundary. Table 16-2 presents the total expropriated private land area, the base land unit values, and the calculated title deed fees for each district. Since all agricultural land along the Project route is classified as **dry farmland** (base land), the 2026 base land unit values obtained from district municipalities are as given under the table Column (3) – Land Unit Value. These figures were sourced from the respective municipal websites for all districts except Çorlu, where the base land value was obtained via telephone from the Real Estate Department.

For the purpose of calculating title deed fees and revolving fund charges, all privately owned agricultural parcels along the route were considered, excluding those owned by the Treasury, under state control and disposal, publicly owned parcels, parcels owned by municipalities and the General Directorate of State Hydraulic Works (DSI), forest land, and unregistered areas. Included in the assessment are all other private parcels, including disputed parcels and those owned by corporate entities.

Table 16-2. Municipal Unit Values and Calculated Title Deed Fees for Privately Owned Land Parcels to be Expropriated Along the Motorway Route

District	Number of Private Parcel	Expropriated Private Parcel Area	Land Unit Value	Total Assessed Value	Title Deed Fee	Revolving Fund Fee
	Count	m^2	TRY/m^2	TRY	TRY	TRY
	1	2	3	4=2x3	5=4x0,04	6=1*6350
Silivri	698	2,602,806.30	32.07	83,471,998.04	3,338,879.92	4,432,300.00
Çorlu	222	2,134,025.15	24.00	51,216,603.60	2,048,664.14	1,409,700.00
Marmaraereğlisi	192	1,343,621.56	9.92	13,328,725.88	533,149.04	1,219,200.00
Süleymanpaşa	1.033	7,301,172.48	24.00	175,228,139.52	7,009,125.58	6,559,550.00
Malkara	111	735,056.49	15.27	11,224,312.60	448,972.50	704,850.00
Total	**2,256**	**14,116,681.98**	-	-	**13,378,791.19**	**14,331,950.00**
Total Title Deed Fees						**13,378,791.19**
Revolving Fund Fee						**14,331,950.00**
Total Transaction Cost for Agricultural Lands						**27,710,741.19**

There is a total of 50 parcels classified as **urban plot** ("*arsa*") along the Motorway route. The 2026 **municipal unit values** for each plot were obtained from the relevant municipal websites. Total title deed fee for these plots has been calculated based on the total expropriated areas and applying **4%** of the corresponding values, as presented in Table 16-3.

Table 16-3. Calculation of Title Deed Fees and Revolving Fund Charges for Privately Owned Urban Plots

No	District	Neighbourhood	Lot/Parcel No	Title Deed Area (m^2)	Expropriated Area (m^2)	2026 Unit Value (TRY/m^2)	Title Deed Fee (TRY)
1	Silivri	Balaban	225/1	11,764.73	419.93	916.20	15,389.59
2	Silivri	Değirmenköy	312/13	6,787.34	4,177.36	916.20	153,091.89
3	Silivri	Değirmenköy	312/14	3,759.57	3,759.57	916.20	137,780.72
4	Silivri	Değirmenköy	312/12	4,405.30	1,826.80	916.20	66,948.57
5	Silivri	Değirmenköy	312/11	3,687.87	545.19	916.20	19,980.12
6	Silivri	Değirmenköy	213/10	7,978.33	542.16	293.20	6,358.45
7	Silivri	Gümüşyaka	7859/9	30,551.73	1,596.39	916.20	58,504.50
8	M.Ereğlisi	Yakuplu	207/200	975.43	280.51	223.56	2,508.43
9	Süleymanpaşa	Kayı	0/677	27,473.44	2,614.03	600.00	62,736.72
10	Süleymanpaşa	Kayı	0/1545	10,150.81	450.14	600.00	10,803.36
11	Süleymanpaşa	Husunlu	104/36	34,432.59	3,695.19	350.00	51,732.66
12	Süleymanpaşa	Gazioğlu	143/1	745.95	745.95	500.00	14,919.00
13	Süleymanpaşa	Gazioğlu	143/2	1,491.92	1,491.92	500.00	29,838.40
14	Süleymanpaşa	Gazioğlu	143/8	605.88	605.88	500.00	12,117.60
15	Süleymanpaşa	Gazioğlu	143/7	596.89	596.89	500.00	11,937.80
16	Süleymanpaşa	Gazioğlu	143/6	596.89	596.89	500.00	11,937.80
17	Süleymanpaşa	Gazioğlu	143/5	596.89	596.89	500.00	11,937.80
18	Süleymanpaşa	Gazioğlu	114/1	945.28	945.28	500.00	18,905.60
19	Süleymanpaşa	Gazioğlu	114/2	945.28	945.28	500.00	18,905.60
20	Süleymanpaşa	Gazioğlu	114/3	945.28	945.28	500.00	18,905.60
21	Süleymanpaşa	Gazioğlu	143/3	596.89	596.89	500.00	11,937.80
22	Süleymanpaşa	Gazioğlu	143/4	596.89	596.89	500.00	11,937.80
23	Süleymanpaşa	Gazioğlu	0/1118	424.00	306.93	500.00	6,138.60
24	Süleymanpaşa	Gazioğlu	0/1117	446.00	244.09	500.00	4,881.80
25	Süleymanpaşa	Gazioğlu	0/1116	448.00	203.77	500.00	4,075.40
26	Süleymanpaşa	Gazioğlu	0/1115	448.00	193.57	500.00	3,871.40
27	Süleymanpaşa	Gazioğlu	0/1114	458.00	183.79	500.00	3,675.80
28	Süleymanpaşa	Gazioğlu	0/1113	456.00	184.99	500.00	3,699.80
29	Süleymanpaşa	Gazioğlu	0/1112	451.00	170.78	500.00	3,415.60
30	Süleymanpaşa	Gazioğlu	0/1111	446.00	166.79	500.00	3,335.80
31	Süleymanpaşa	Gazioğlu	0/1110	456.00	155.91	500.00	3,118.20
32	Süleymanpaşa	Gazioğlu	0/1109	401.00	153.36	500.00	3,067.20

No	District	Neighbourhood	Lot/Parcel No	Title Deed Area (m²)	Expropriated Area (m²)	2026 Unit Value (TRY/m²)	Title Deed Fee (TRY)
33	Süleymanpaşa	Gazioğlu	0/1108	451.00	146.38	500.00	2,927.60
34	Süleymanpaşa	Gazioğlu	0/1107	444.00	141.31	500.00	2,826.20
35	Süleymanpaşa	Gazioğlu	0/1105	419.00	125.65	500.00	2,513.00
36	Süleymanpaşa	Gazioğlu	0/1104	407.00	121.32	500.00	2,426.40
37	Süleymanpaşa	Gazioğlu	0/1103	430.00	127.10	500.00	2,542.00
38	Süleymanpaşa	Gazioğlu	0/1102	404.00	113.56	500.00	2,271.20
39	Süleymanpaşa	Gazioğlu	0/1100	402.00	101.89	500.00	2,037.80
40	Süleymanpaşa	Gazioğlu	0/1099	375.00	94.00	500.00	1,880.00
41	Süleymanpaşa	Gazioğlu	0/1098	390.00	92.30	500.00	1,846.00
42	Süleymanpaşa	Gazioğlu	0/1097	380.00	80.81	500.00	1,616.20
43	Süleymanpaşa	Gazioğlu	0/1096	380.00	78.61	500.00	1,572.20
44	Süleymanpaşa	Gazioğlu	0/1095	380.00	71.35	500.00	1,427.00
45	Süleymanpaşa	Gazioğlu	0/1094	375.00	60.32	500.00	1,206.40
46	Süleymanpaşa	Gazioğlu	0/1093	380.00	55.77	500.00	1,115.40
47	Süleymanpaşa	Gazioğlu	0/1092	380.00	49.71	500.00	994.20
47	Süleymanpaşa	Gazioğlu	0/1091	385.00	34.21	500.00	684.20
49	Süleymanpaşa	Gazioğlu	0/1090	366.00	11.00	500.00	220.00
50	Süleymanpaşa	Köseilyas	0/779	3,000.00	933.37	5,800.00	216,541.84
Total Title Deed Fees							**1,045,043.06**
Revolving Fund Fee							**317,500.00**
Total Transaction Cost for Urban Plots							**1,362,543.06**

Crop Payments

Regardless of whether an agreement is reached or not, **if land entry occurs before harvest**, the crop value is due. In practice, the KGM often refrains from paying additional crop compensation once the owner/user has received the expropriation compensation. Therefore, if land entry occurs before harvest, crop payments (compensation for loss or damage) will be done by the SPV from the RAP Fund. This will be an integral part of RAP implementation, rather than a livelihood restoration measure, as it directly addresses and compensates for the actual impact.

At this stage, it is not possible to estimate the number of households that may be affected. On the other hand, as a basis for estimating the potential crop compensation to be paid along the expropriation corridor, KGM's Head of the Division of Appraisal under the Department of Immovable was consulted in 2025 to draw upon past experience in BOT motorway projects, particularly regarding the proportion of total expropriated land on which compensation for crops has historically been paid. It was noted that, in previous BOT motorway projects, in accordance with the principles of the Expropriation Law, compensation for crops was typically paid on less than **5**% of the total expropriated area. Based on this precedent, it has been assumed that a similar proportion may apply in the Project corridor. Accordingly, a provisional budget line for crop compensation has been included under the RAP Fund based on the assumption that compensation for crops would be paid for maximum 5% of the total expropriated area.

In the calculation of crop payments (compensation for loss or damage), the method applied will be appropriate to the **stage of growth of the crop,** as summarised below:

- **For crops that have reached the harvest stage**, the **net market value** of the crop will be calculated by deducting the expenses that will not be incurred due to entry onto the land from the total market value of the main and by-products (i.e. **market value – saved costs**).

- **In the case of crops that are still in the early stages of development** and cannot yet be utilised economically (such as newly sprouted annual crops or fruit and non-fruit trees in their establishment period), an appropriate amount of compensation will be calculated by considering both the investments made and the income foregone. **For lands left fallow**, ploughing costs will be taken into account.

- **In determining the value of crops that are not yet economically utilisable**, **production costs** will be taken as the basis. During this stage, the cost analysis will include the actual expenses incurred (ploughing, sowing, fertilisation, spraying, irrigation, harvesting, and marketing), together with calculated costs such as rent, interest, and general administrative expenses. Accordingly, the total of all expenses incurred and calculated up to the time of entry onto the land will constitute the total crop value.

Accordingly, the stage of the crop at which the land is entered is of critical importance. In the calculation of compensation for loss or damage for annual field crops, the method applied depends on the stage of growth of the crop. Accordingly, three main stages can generally be defined for each field crop: (i) the **sowing – planting** stage, (ii) the **maintenance** stage, and (i) the **stage close to harvest**.

Information on when each of these stages begins and ends for the relevant crop will be obtained both from landowners whose land is subject to expropriation or from agricultural engineers or experts. The calendar showing the stages of growth for the typical crop types across the Project route is presented in Table 16-4. Taking this calendar into account, the method for calculating the loss or damage will become clear depending on the date on which the damage (land entry) occurred.

Table 16-4. Calendar to Be Used in Crop Value Calculation

Crops	Months											
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Wheat, Barley												
Summer-Planted Crops (Sunflower, Vetch, Oats, Silage Maize, Canola, etc.)												
Vegetables (Tomato, Cucumber, Pepper, Onion, Melon, Watermelon)												

Colour Code:	
Sowing – Planting	
Maintenance	
Stage Close to Harvest	

As an example, in the case of **wheat**, the sowing stage covers the period from soil preparation up to the sowing of the seed. Although seed sowing is generally carried out in November, this stage extends until the end of February, as no maintenance activities are typically undertaken until March. The maintenance stage, on the other hand, covers the period from March to May, during which fertilisation, spraying, and, where applicable, irrigation activities are carried out. The stage close to harvest begins in early June, following the completion of maintenance activities, when stem elongation occurs and the ears begin to mature, and continues until the harvest period.

The crop values for potential damages that may occur during Project implementation have been calculated by the RAP Consultant's Senior Expropriation and Valuation Expert (Agricultural Economist), based on the detailed data on costs incurred during the latest production period in crop production, obtained from the District Agriculture and Forestry Directorates along the Project route. The crop values for different types of products in different districts is presented in Table 16-5. These values will be updated annually as new data are published by the District Directorates of Agriculture and Forestry each year.

Table 16-5. Crop Types Cultivated in Districts based on 2025 Prices and Compensation for Loss or Damage Calculated by Production Stages

District	Crops	Crop Values (TRY/da)		
		Sowing-planting	Maintenance	Stage close to Harvest
Silivri[127]	Wheat	4,628.56	6,490.92	8,239.50
	Barley	4,537.92	6,519.25	7,150.00
	Sunflower	4,925.97	5,108.95	4,962.00
	Canola	4,301.41	6,346.47	6,375.00
	Silage Maize (*)	6,158.11	9,399.91	10,425.00
	Melon(*)	8,798.00	23,708.28	52,450.00
	Oats	3,682.51	3,968.59	5,550.00
	Vetch	3,308.62	3,567.79	7,050.00
	Cucumber(*)	33,214.15	44,834.48	166,935.00
	Beans(*)	7,606.08	23,813.65	26,200.00
	Tomato(*)	12,650.20	20,176.15	74,105.00
	Pepper(*)	23,583.65	36,057.98	55,713.00
	Watermelon(*)	12,451.93	22,855.70	34,490.00
	Peas(*)	8,684.70	12,865.47	18,470.00
	Wheat	3,471.59	5.904.14	5,777.00

[127]In Silivri, for sunflower, the compensation for loss or damage to be calculated at the stage close to harvest is unexpectedly lower than in the other stages.

District	Crops	Crop Values (TRY/da)		
		Sowing-planting	Maintenance	Stage close to Harvest
Çorlu[128]	Barley	3,281.82	5.820.87	5,085.00
	Sunflower	3,832.45	4.846.49	3,790.00
	Canola	3,383.79	6.596.41	6,625.00
	Melon(*)	13,856.11	22.087.35	23,875.00
	Watermelon(*)	16,413.49	28.646.49	35,640.00
Marmaraereğlisi[129]	Wheat	3,902.19	6,426.52	6,827.50
	Barley	3,808.72	6,333.05	6,325.00
	Sunflower	3,977.09	5,099.89	3,528.50
	Canola	3,752.75	6,793.72	7,570.00
	Ryegrass	3,494.43	4,281.86	5,700.00
	Watermelon(*)	15,782.95	26,415.24	17,100.00

(*) Irrigated.

[128]In Çorlu, for wheat, barley, and sunflower, the compensation for loss or damage calculated at the stage close to harvest is lower than that calculated for the maintenance stage. Therefore, the calculated figures for these crops should not be considered reliable.

[129]In Marmaraereğlisi, for certain crops such as barley, sunflower, and watermelon, the compensation for loss or damage calculated at the stage close to harvest is lower than that calculated for the maintenance stage. The crop sale price provided by the Marmaraereğlisi District Directorate of Agriculture and Forestry, particularly for watermelon (3.6 TRY/kg), appears to be significantly low. Therefore, the calculated figures for these crops should not be considered reliable.

APPENDICES

Appendix A - Engineering Structures

A.1 – List of Overpasses

No	Location	Road KM	Length (m)	Width (m)	Total Area (m^2)
1	Main Road	4+193.05	44.50	12.00	534.00
2	Main Road	5+079.24	45.42	12.00	545.04
3	Main Road	7+904.50	51.38	12.00	616.56
4	Main Road	8+512.68	49.26	12.00	591.12
5	Main Road	10+300.17	57.28	12.00	687.36
6	Main Road	11+024.64	44.64	12.00	535.68
7	Main Road	13+979.90	57.18	12.00	686.16
8	Main Road	15+176.00	44.50	12.00	534.00
9	Marmaraereğlisi Intersection (Connection Road)	19+794.78; 0+279.03	52.13	28.50	1,485.71
10	Main Road (State Road)	20+085.96; 2+640.64	58.40	25.50	1,489.20
11	Marmaraereğlisi Intersection (Connection Road)	19+794.78; 1+404.18	36.21	32.50	1,176.83
12	Main Road	23+440.31	51.68	10.00	516.80
13	Çorlu Airport Intersection (Main Road)	23+937.84	54.32	28.50	1,548.12
14	Çorlu Airport Intersection (Main Road)	23+937.84; 0+343.13	22.29	12.00	267.48
15	Çorlu Airport Intersection (Connection Road)	23+937.84; 3+927.71	34.12	12.00	409.44
16	Main Road	24+196.28	53.08	12.00	636.96
17	Main Road	26+714.12	59.52	12.00	714.24
18	Main Road	29+407.50	51.50	10.00	515.00
19	Main Road	30+236.47	52.44	12.00	629.28
20	Main Road	35+910.00	44.50	10.00	445.00
21	Karatepe Intersection (Main Road)	37+608.28; 0+273.04	53.16	28.50	1,515.06
22	Karatepe Intersection (Connection Road)	37+608.28; 1+328.96	42.31	32.50	1,375.08
23	Main Road	41+170.00	44.50	10.00	445.00
24	Main Road	47+160.00	58.35	10.00	583.50
25	Main Road	49+470.00	44.50	10.00	445.00
26	Tekirdağ East Intersection (Connection Road)	51+420.11; 0+306.62	64.84	28.50	1,847.94
27	Tekirdağ East Intersection (State Road)	51+420.11; 0+523.04	128.37	13.25	1,700.90
28	Main Road	53+625.00	44.52	12.00	534.24
29	Tekirdağ Intersection (Connection Road)	59+294.31; 0+339.27	73.30	28.50	2,089.05
30	Tekirdağ Intersection (Connection Road)	59+294.31; 1+080.00	51.50	13.00	669.5
31	Tekirdağ Intersection (Connection Road)	59+294.31; 1+511.71	36.61	33.50	1,226.43
32	Tekirdağ Intersection (State Road)	60+350.45; 2+756.15	105.00	33.50	3,517.50
33	Main Road	63+823.67	45.89	12.00	550.68
34	Main Road	65+781.76	48.86	10.00	488.60
35	Hayrabolu Intersection (State Road)	66+590.42; 39+245.73	37.71	33.50	1,263.29
36	Main Road	67+851.84	46.43	12.00	557.16
37	Main Road	68+270.88	46.58	26.50	1,234.37
38	Tekirdağ West Intersection (Main Road)	72+903.11	78.00	14.25	1,111.50
39	Tekirdağ West Intersection (Connection Road)	72+903.11; 0+347.49	36.00	10.00	360.00
40	Tekirdağ West Intersection (State Road)	72+903.11; 0+843.69	39.00	38.50	1,501.50
41	Tekirdağ West Intersection (State Road)	72+903.11; 0+840.18	74.90	13.25	992.43
42	Tekirdağ West Intersection (State Road)	72+903.11; 1+083.74	50.00	13.25	662.50

No	Location	Road KM	Length (m)	Width (m)	Total Area (m^2)
43	Tekirdağ West Intersection (Main Road)	73+278.78	60.80	14.25	866.40
44	Main Road	75+729.76	46.27	12.00	555.24
45	Main Road	77+302.35	56.48	12.00	677.76
46	Main Road	86+653.70	44.50	10.00	445.00
47	Main Road	88+547.10	44.50	10.00	445.00
48	Main Road	92+333.85	53.00	10.00	530.00
49	Main Road	93+735.40	46.00	10.00	460.00
50	Main Road	94+678.44	47.80	10.00	478.00
51	Main Road	99+343.18	52.00	12.00	624.00
52	Main Road	104+651.67	47.72	10.00	477.20

A.2 – List of Underpasses

No	Location	Type of Underpass	Road KM	Dimensions (m)	Total Length (m)
1	Main Road	Girder	0+830.84	--	29.21
2	Silivri Intersection (Main Road)	Girder	1+298.43	--	29.94
3	Silivri Intersection (State Road)	Girder	1+298.43; 0+727.61	--	40.00
4	Main Road	Girder	1+744.4	--	75.48
5	Main Road	Portal	2+374.50	12.0x5.5	71.06
6	Main Road	Girder	3+457.50	--	105.00
7	Main Road	Portal	3+841.50	9.0x5.5	53.27
8	Main Road	Girder	6+482.30	--	60.00
9	Main Road	Portal	6+555.00	9.0x5.5	50.68
10	Çanta Intersection (Main Road)	Girder	12+164.30	--	38.90
11	Çanta Intersection (Connection Road)	Girder	12+164.30; 1+655.45	--	38.23
12	Main Road	Girder	13+212.50	--	40.00
13	Main Road	Portal	16+523.05	9.0x5.5	50.64
14	Main Road	Portal	16+773.00	9.0x5.5	45.65
15	Main Road	Portal	17+455.00	9.0x5.5	42.89
16	Main Road	Girder	17+723.00	--	100.00
17	Çorlu Airport Intersection (Connection Road)	Portal	23+937.84; 1+076.83	9.0x5.5	33.56
18	Çorlu Airport Intersection (Connection Road)	Portal	23+937.84; 1+411.09	9.0x5.5	35.26
19	Main Road	Girder	24+791.00	--	50.00
20	Main Road	Portal	31+746.20	7.0x5.5	49.46
21	Main Road	Girder	34+532.00	--	50.00
22	Main Road	Girder	38+445.41	--	39.65
23	Main Road	Portal	39+384.00	9.0x5.5	69.92
24	Main Road	Portal	42+748.00	7.0x5.5	46.27
25	Main Road	Girder	43+227.00	--	200.00
26	Main Road	Portal	44+404.40	12.0x5.5	52.07
27	Main Road	Portal	48+217.82	12.0x5.5	45.65
28	Tekirdağ East Intersection (Connection Road)	Portal	51+420.11; 0+660.00	9.0x5.5	56.57
29	Tekirdağ East Intersection (State Road)	Girder	51+420.11; 1+088.57	--	27.97
30	Main Road	Portal	51+850.00	9.0x5.5	61.00
31	Main Road	Portal	54+956.40	12.0x5.5	44.54
32	Main Road	Portal	56+268.00	2x(12.0x5.5)	87.45
33	Main Road	Portal	58+193.17	9.0x5.5	46.70
34	Main Road	Portal	61+359.49	7.0x5.5	49.52
35	Main Road	Girder	62+666.47	--	40.00
36	Hayrabolu Intersection (Main Road)	Girder	66+590.42	--	37.15
37	Main Road	Portal	70+437.15	9.0x5.5	55.41
38	Main Road	Portal	71+703.12	9.0x5.5	52.36
39	Main Road	Portal	78+636.00	7.0x5.5	71.56
40	Main Road	Girder	79+041.64	--	60.30
41	Main Road	Portal	80+249.75	12.0x6.0	58.89
42	Main Road	Portal	82+757.00	7.0x5.5	50.38
43	Main Road	Portal	83+307.10	9.0x5.5	56.77
44	Main Road	Girder	84+528.60	--	50.00
45	Main Road	Portal	84+952.70	12.0x5.5	68.04
46	Main Road	Portal	90+304.51	9.0x5.5	56.83
47	Main Road	Portal	91+218.70	12.0x5.5	50.20
48	Main Road	Girder	91+412.10	--	60.00
49	Main Road	Portal	96+571.14	12.0x5.5	57.78
50	Main Road	Portal	100+605.02	7.0x5.5	49.79
51	Main Road	Portal	103+718.04	7.0x5.5	44.86

A.3 – List of Culverts

No	Location	Road KM	Dimensions (m)	Length (m)
1	Main Road	0+074.95	2.0x2.0	14.70
2	Main Road	0+908.51	2.0x2.0	116.98
3	Silivri Intersection (Main Road)	1+298.43; 0+361.22	2.0x2.0	8.00
4	Main Road	1+255.00	2.0x2.0	94.64
5	Silivri Intersection (Silivri State Road)	1+298.43; 0+264.26	4.0x3.0	7.75
6	Silivri Intersection (Main Road)	1+298.43; 0+158.00	2.0x2.0	13.75
7	Main Road	2+400.00	2.0x2.0	97.87
8	Main Road	5+821.00	2.0x2.0	65.22
9	Main Road	7+540.50	2.5x2.5	116.76
10	Main Road	9+321.30	2.0x2.5	42.81
11	Main Road	9+515.00	2.0x2.0	51.71
12	Main Road	10+180.00	2.0x2.0	57.65
13	Main Road (Side Road)	11+024.64; 0+412.00	2.5x2.5	51.36
14	Main Road	11+314.20	2.5x2.5	103.32
15	Çanta Intersection (Connection Road)	12+164.30; 1+613.40	2.0x2.0	65.73
16	Çanta Intersection (State Road)	12+164.30; 0+330.00	2.0x2.0	36.43
17	Çanta Intersection (State Road)	12+164.30; 0+174.66	5.0x2.5	19.07
18	Çanta Intersection (State Road)	12+164.30; 0+808.69	5.0x2.5	32.41
19	Main Road	13+072.40	2.0x2.0	72.87
20	Main Road	13+578.50	2.5x2.0	64.63
21	Main Road	16+000.00	4.0x3.0	100.00
22	Main Road	16+737.82	2.0x2.0	67.47
23	Marmaraereğlisi Intersection (State Road)	19+794.78; 0+211.81	2.0x2.0	17.82
24	Marmaraereğlisi Intersection (State Road)	19+794.78; 0+304.00	2.0x2.0	23.18
25	Marmaraereğlisi Intersection (State Road)	19+794.78; 3+603.00	2.0x2.0	42.91
26	Marmaraereğlisi Intersection (State Road)	19+794.78; 3+825.00	2.0x2.0	47.92
27	Marmaraereğlisi Intersection (State Road)	19+794.78; 4+106.39	2.0x2.0	81.95
28	Main Road	20+901.50	4.0x4.0	86.08
29	Main Road	21+065.00	2.5x3.0	97.49
30	Main Road	22+910.00	2.5x3.0	62.14
31	Main Road	23+745.60	4.0x4.0	126.38
32	Çorlu Airport Intersection (Main Road)	23+937.84; 0+024.00	2.0x2.0	45.06
33	Çorlu Airport Intersection (Connection Road)	23+937.84; 0+439.00	2.0x2.0	110.35
34	Çorlu Airport Intersection (Connection Road)	23+937.84; 2+266.70	2.0x2.0	57.96
35	Çorlu Airport Intersection (Connection Road)	23+937.84; 4+608.00	2.0x2.0	42.68
36	Çorlu Airport Intersection (Connection Road)	23+937.84; 4+702.00	2.0x2.0	51.57
37	Main Road	24+325.70	2.0x2.0	89.09
38	Main Road	25+416.50	2.0x2.0	47.75
39	Main Road	25+840.00	2.0x2.0	59.27
40	Main Road	26+035.50	2.0x2.0	70.51
41	Main Road	26+128.00	2.0x2.0	65.17
42	Main Road	27+827.00	2.0x2.0	64.04
43	Main Road	28+031.70	2.0x2.0	78.92
44	Main Road	28+949.50	2.5x2.5	74.61
45	Main Road	32+217.80	2.0x2.0	82.85
46	Main Road	33+862.70	8.0x5.0	94.67
47	Main Road	34+698.70	2.0x2.0	63.87
48	Main Road	34+800.70	2.0x2.5	55.76
49	Main Road	35+298.00	2.0x2.0	64.12

No	Location	Road KM	Dimensions (m)	Length (m)
50	Main Road	35+763.00	2.0x2.0	42.84
51	Main Road	36+928.00	6.0x5.0	65.34
52	Karatepe Intersection (State Road)	37+068.28; 10+177.18	1.5x1.5	7.50
53	Karatepe Intersection (State Road)	37+068.28; 10+455.43	1.5x1.5	28.00
54	Karatepe Intersection (State Road)	37+068.28; 11+036.69	1.5x1.5	8.50
55	Karatepe Intersection (State Road)	37+068.28; 11+606.38	1.5x1.5	3.50
56	Main Road	39+065.00	8.0x5.0	89.19
57	Main Road	39+808.50	2.0x2.0	56.98
58	Main Road	41+389.50	2.0x2.0	46.24
59	Main Road	41+947.80	2.0x2.5	101.12
60	Main Road	42+463.00	2.0x2.0	81.64
61	Main Road	42+945.30	3.0x3.0	79.55
62	Main Road	44+044.00	2.0x2.0	51.60
63	Main Road	44+436.30	2.0x2.0	96.86
64	Main Road	44+812.50	2.5x2.5	109.25
65	Main Road	45+161.40	2.0x2.5	72.67
66	Main Road	16+000.00	4.0x3.0	100
67	Main Road	45+840.00	5.0x5.0	66.64
68	Main Road	49+110.80	2.5x2.5	149.21
69	Main Road	50+365.00	4.0x4.0	73.19
70	Tekirdağ East Intersection (Connection Road)	51+420.11; 1+334.00	3.0x2.5	54.01
71	Tekirdağ East Intersection (Connection Road)	51+420.11; 1+833.60	2.0x2.0	44.53
72	Tekirdağ East Intersection (State Road)	51+420.11; 1+831.50	3.0x2.0	26.50
73	Main Road	51+506.00	2.0x2.0	171.15
74	Main Road	51+926.00	6.0x5.0	62.97
75	Main Road (Side Road)	53+038.00; 0+377.58	2.5x2.5	12.06
76	Main Road (Side Road)	53+290.00; 0+159.97	2.5x2.5	22.21
77	Main Road	53+420.00	2.5x2.5	47.48
78	Main Road	54+432.27	2.0x2.0	50.58
79	Main Road	55+946.30	8.0x5.0	162.38
80	Main Road	57+683.00	2.0x2.0	83.98
81	Main Road	58+638.00	2.5X3.0	164.88
82	Tekirdağ Intersection (Connection Road)	59+294.31; 0+607.00	2.0x2.0	70.03
83	Tekirdağ Intersection (State Road)	59+294.31; 3+011.56	2.0x2.0	12.00
84	Main Road	60+575.00	2.0x2.0	70.94
85	Main Road	60+834.50	2.0x2.0	47.45
86	Main Road	61+199.50	2.5x2.5	147.77
87	Main Road	61+461.00	2.0x2.0	60.00
88	Main Road	61+953.60	2.5x2.5	53.22
89	Main Road	62+738.00	2.5x2.5	54.92
90	Main Road	63+902.00	2.0x2.0	45.79
91	Main Road	64+324.00	2.0x2.0	89.31
92	Main Road	64+788.20	2.0x2.0	77.35
93	Main Road	65+031.60	2.0x2.0	102.03
94	Main Road	65+272.20	2.0x2.0	99.49
95	Main Road	65+970.00	2.5x2.5	74.13
96	Main Road	66+381.00	2.0x2.0	58.83
97	Hayrabolu Intersection (Main Road)	66+590.42; 0+305.14	2.0x2.0	18.00
98	Hayrabolu Intersection (Connection Road)	66+590.42; 0+557.60	2.0x2.0	98.16
99	Hayrabolu Intersection (State Road)	66+590.42; 38+612.91	2.0x2.0	9.00
100	Hayrabolu Intersection (State Road)	66+590.42; 39+364.98	2.0x2.0	9.00
101	Main Road	66+728.60	3.0x3.0	186.56
102	Main Road	67+582.50	2.0x2.0	45.46
103	Main Road	68+141.70	2.0x2.0	51.62
104	Main Road	68+454.00	2.0x2.0	41.72

No	Location	Road KM	Dimensions (m)	Length (m)
105	Main Road	69+578.00	2.0x2.0	70.14
106	Main Road	71+337.00	5.0x4.0	108.56
107	Main Road	72+595.50	2.0x2.0	109.99
108	Main Road	72+745.50	2.5x2.5	252.70
109	Tekirdağ West Intersection (Main Road)	72+903.11; 0+797.00	2.0x2.0	72.88
110	Tekirdağ West Intersection (Main Road)	72+903.11; 1+103.60	2.0x2.0	73.10
111	Tekirdağ West Intersection (Connection Road)	72+903.11; 0+591.60	2.0x2.0	78.48
112	Tekirdağ West Intersection (State Road)	72+903.11; 0+382.60	2.0x2.0	36.16
113	Tekirdağ West Intersection (State Road)	72+903.11; 0+555.00	2.0x2.0	20.19
114	Tekirdağ West Intersection (State Road)	72+903.11; 1+385.14	1.5x1.5	8.43
115	Tekirdağ West Intersection (State Road)	72+903.11; 1+822.34	1.5x1.5	6.41
116	Main Road	73+453.60	2.5x2.5	177.14
117	Main Road	73+913.70	5.0x5.0	106.81
118	Main Road	74+336.00	2.0x2.0	130.01
119	Main Road	74+606.00	2.0x2.0	208.95
120	Main Road	75+109.00	2.0x2.0	63.24
121	Main Road	75+525.00	2.0x2.0	117.63
122	Main Road	76+338.60	2.0x2.0	162.10
123	Main Road	77+073.00	2.0x2.0	90.06
124	Main Road	77+880.23	2.0x2.0	78.17
125	Main Road	79+734.23	2.0x2.0	186.22
126	Main Road	80+086.93	2.0x2.5	111.09
127	Main Road	81+120.00	2.0x2.0	47.59
128	Main Road	81+696.60	4.0x4.0	78.30
129	Main Road	82+176.00	2.0x2.0	59.06
130	Main Road	83+224.10	4.0x3.0	86.41
131	Main Road	83+700	4.0x3.0	100.00
132	Main Road	86+989.00	2.5x2.5	57.46
133	Main Road	87+911.00	5.0x3.0	157.76
134	Main Road	88+818.10	2.0x2.5	86.29
135	Main Road	90+718.00	4.0x3.0	170.98
136	Main Road	91+652.00	2.0x2.0	57.30
137	Main Road	91+975.00	2.0x2.0	65.81
138	Main Road	92+533.80	2.0x2.0	92.34
139	Main Road	93+863.00	2.0x2.0	49.33
140	Main Road	94+097.10	2.0x2.0	93.00
141	Main Road	95+089.00	2.0x2.5	91.29
142	Main Road	95+831.00	2.0x2.0	80.34
143	Main Road	95+998.00	2.0x2.0	61.58
144	Main Road	96+305.00	3.0x3.0	129.61
145	Main Road	96+833.70	4.0x4.0	108.43
146	Main Road	97+702.00	2.0x2.0	66.13
147	Main Road	98+020.00	2.0x2.0	81.38
148	Main Road	98+321.00	2.0x2.0	83.97
149	Main Road	98+386.00	2.0x2.0	116.03
150	Main Road	98+567.00	2.0x2.0	75.07
151	Main Road	98+828.00	2.0x2.0	122.22
152	Main Road	98+979.00	2.0x2.0	94.40
153	Main Road	99+690.00	2.0x2.0	77.37
154	Main Road	101+310.00	2.0x2.0	51.74
155	Main Road	101+653.00	2.0x2.0	71.16
156	Main Road	102+764.00	2.0x2.0	61.98
157	Main Road	104+361.00	2.5x2.5	68.92
158	Main Road	105+019.00	3.0x3.0	80.88

Appendix B – Technical Assessment on Net Income Loss Calculation Arising from Restricted Access to Residual Parcels

TECHNICAL REPORT

Net Income Loss Calculation Arising from Restricted Access to Residual Parcels Caused by Underpasses and Overpasses

An estimation methodology and parcel-level findings along the motorway corridor – Districts of Silivri, Çorlu, Marmara Ereğlisi, Süleymanpaşa and Malkara

Prepared by

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Date

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1. Methodology

Partial expropriation of an agricultural parcel may result not only in a loss of value of the residual parcel, but also in a recurring loss of net income. In particular, it is important to determine whether access to the residual parcel imposes additional costs on the owner and/or user of the parcel — most obviously, additional fuel costs. For this reason, the provision of underpasses and overpasses at short intervals along motorway alignments is of considerable importance. The analysis presented in this report draws on maps showing the location of underpasses and overpasses along the motorway corridor, together with 2025 income and cost data for crops grown in the prevailing rotation, as published by the relevant District Directorates of Agriculture and Forestry.

The calculations are based on the following assumptions: an average tractor of 50 – 60 horsepower travels at approximately 30 km/h and consumes approximately 5 litres of diesel per hour. The unit price of diesel for the European side of İstanbul (Silivri) is taken as TRY 69.35/litre, giving an hourly fuel cost of TRY 69.35/litre × 5 litres = TRY 346.75 per hour (Anonymous, 2026a). Given that the tractor covers approximately 30 km in one hour, this equates to a fuel cost of TRY 11.55 per kilometre. On the basis of this consumption rate, the net income loss can be calculated for wheat production over various distances and parcel sizes (in decares). The figures published by the Silivri District Directorate of Agriculture and Forestry for wheat in 2025 are: Gross Production Value (GPV) of TRY 8,100/da; Total Production Cost of TRY 5,649.25/da; and Net Income of TRY 2,450.75/da (Anonymous, 2026b). The additional access costs incurred after expropriation are calculated below for each decare and for each kilometre, and presented in dedicated tables.

The second, third and fourth columns of Table 1 are based on data obtained from the Silivri District Directorate of Agriculture and Forestry. The additional access cost has been calculated using the assumptions set out above. For example, where the residual parcel is located on the opposite side of the motorway from the residence of the owner/user, and an underpass or overpass causes a 1 km increase in the access route compared with the pre-expropriation condition, the round trip becomes 2 km longer. Wheat production typically requires the owner/user to visit the parcel approximately ten times per production cycle (four ploughing operations, sowing, fertiliser application, pesticide application, irrigation where applicable, harvesting and transport), which corresponds to an additional 20 km travelled in total and an additional fuel cost of TRY 231. The size of the residual parcel does not affect the magnitude of this additional cost: whether the residual parcel is 1 da or 10 da, the additional cost incurred is the same. From this, the loss in net income can be calculated as a percentage. For example, where access to the residual parcel increases by 1 km and the residual parcel is 1 da, the income loss is 9%, whereas for a 2 da residual parcel the loss is 5%. Income losses below 10% arising from additional access costs may reasonably be regarded as a tolerable cost; however, where the income loss exceeds 10%, compensation should be considered.

Table 1. Net Income Loss for Wheat Production where Access to the Residual Parcel Increases by 1 km (%)

Residual Parcel Area (da)	GPV (TRY/da)	Production Costs (TRY/da)	Net Income (TRY/da)	Additional Access Cost (TRY)	Revised Net Income (TRY/da)	Net Income Loss (%)
1	8,100.00	5,649.25	2,450.75	231.00	2,219.75	−9%
2	16,200.00	11,298.50	4,901.50	231.00	4,670.50	−5%
3	24,300.00	16,947.75	7,352.25	231.00	7,121.25	−3%
4	32,400.00	22,597.00	9,803.00	231.00	9,572.00	−2%
5	40,500.00	28,246.25	12,253.75	231.00	12,022.75	−2%
6	48,600.00	33,895.50	14,704.50	231.00	14,473.50	−2%
7	56,700.00	39,544.75	17,155.25	231.00	16,924.25	−1%
8	64,800.00	45,194.00	19,606.00	231.00	19,375.00	−1%
9	72,900.00	50,843.25	22,056.75	231.00	21,825.75	−1%
10	81,000.00	56,492.50	24,507.50	231.00	24,276.50	−1%

Where access to the residual parcel increases by 2 km, the income loss for a 1 da parcel is calculated at 19% (Table 2). This figure can be interpreted as follows: in the case of a residual parcel of approximately 1 da located within the boundaries of Silivri district, where the parcel is on the opposite side of the motorway from the owner's residence, the additional access cost results in a 19% loss of income from wheat production for the owner and/or user.

Table 2. Net Income Loss for Wheat Production where Access to the Residual Parcel Increases by 2 km (%)

Residual Parcel Area (da)	GPV (TRY/da)	Production Costs (TRY/da)	Net Income (TRY/da)	Additional Access Cost (TRY)	Revised Net Income (TRY/da)	Net Income Loss (%)
1	8,100.00	5,649.25	2,450.75	462.00	1,988.75	**−19%**
2	16,200.00	11,298.50	4,901.50	462.00	4,439.50	−9%
3	24,300.00	16,947.75	7,352.25	462.00	6,890.25	−6%
4	32,400.00	22,597.00	9,803.00	462.00	9,341.00	−5%
5	40,500.00	28,246.25	12,253.75	462.00	11,791.75	−4%
6	48,600.00	33,895.50	14,704.50	462.00	14,242.50	−3%
7	56,700.00	39,544.75	17,155.25	462.00	16,693.25	−3%
8	64,800.00	45,194.00	19,606.00	462.00	19,144.00	−2%
9	72,900.00	50,843.25	22,056.75	462.00	21,594.75	−2%
10	81,000.00	56,492.50	24,507.50	462.00	24,045.50	−2%

Table 3 presents the net income loss where access to the residual parcel increases by 3 km. The income loss is 28% for a 1 da parcel and 14% for a 2 da parcel. Income losses below 10% have been disregarded. The 28% figure can be interpreted as follows: where the residual parcel within Silivri district has an area of 1 da and the owner/user is required to travel an additional 3 km to reach the parcel as a result of the motorway, the resulting loss of net income is 28%.

Table 3. Net Income Loss for Wheat Production where Access to the Residual Parcel Increases by 3 km (%)

Residual Parcel Area (da)	GPV (TRY/da)	Production Costs (TRY/da)	Net Income (TRY/da)	Additional Access Cost (TRY)	Revised Net Income (TRY/da)	Net Income Loss (%)
1	8,100.00	5,649.25	2,450.75	693.00	1,757.75	**−28%**
2	16,200.00	11,298.50	4,901.50	693.00	4,208.50	**−14%**
3	24,300.00	16,947.75	7,352.25	693.00	6,659.25	−9%
4	32,400.00	22,597.00	9,803.00	693.00	9,110.00	−7%
5	40,500.00	28,246.25	12,253.75	693.00	11,560.75	−6%
6	48,600.00	33,895.50	14,704.50	693.00	14,011.50	−5%
7	56,700.00	39,544.75	17,155.25	693.00	16,462.25	−4%
8	64,800.00	45,194.00	19,606.00	693.00	18,913.00	−4%
9	72,900.00	50,843.25	22,056.75	693.00	21,363.75	−3%
10	81,000.00	56,492.50	24,507.50	693.00	23,814.50	−3%

Table 4 presents the net income loss where access to the residual parcel increases by 4 km. The income loss is 38% for a 1 da parcel, 19% for a 2 da parcel and 13% for a 3 da parcel. Income losses below 10% have been disregarded.

Table 4. Net Income Loss for Wheat Production where Access to the Residual Parcel Increases by 4 km (%)

Residual Parcel Area (da)	GPV (TRY/da)	Production Costs (TRY/da)	Net Income (TRY/da)	Additional Access Cost (TRY)	Revised Net Income (TRY/da)	Net Income Loss (%)
1	8,100.00	5,649.25	2,450.75	924.00	1,526.75	**−38%**
2	16,200.00	11,298.50	4,901.50	924.00	3,977.50	**−19%**
3	24,300.00	16,947.75	7,352.25	924.00	6,428.25	**−13%**
4	32,400.00	22,597.00	9,803.00	924.00	8,879.00	−9%
5	40,500.00	28,246.25	12,253.75	924.00	11,329.75	−8%
6	48,600.00	33,895.50	14,704.50	924.00	13,780.50	−6%
7	56,700.00	39,544.75	17,155.25	924.00	16,231.25	−5%
8	64,800.00	45,194.00	19,606.00	924.00	18,682.00	−5%
9	72,900.00	50,843.25	22,056.75	924.00	21,132.75	−4%
10	81,000.00	56,492.50	24,507.50	924.00	23,583.50	−4%

Table 5 presents the net income loss where access to the residual parcel increases by 5 km. The income loss is 47% for a 1 da parcel, 24% for a 2 da parcel, 16% for a 3 da parcel and 12% for a 4 da parcel. Income losses below 10% have been disregarded.

Table 5. Net Income Loss for Wheat Production where Access to the Residual Parcel Increases by 5 km (%)

Residual Parcel Area (da)	GPV (TRY/da)	Production Costs (TRY/da)	Net Income (TRY/da)	Additional Access Cost (TRY)	Revised Net Income (TRY/da)	Net Income Loss (%)
1	8,100.00	5,649.25	2,450.75	1,155.00	1,295.75	**−47%**
2	16,200.00	11,298.50	4,901.50	1,155.00	3,746.50	**−24%**
3	24,300.00	16,947.75	7,352.25	1,155.00	6,197.25	**−16%**
4	32,400.00	22,597.00	9,803.00	1,155.00	8,648.00	**−12%**
5	40,500.00	28,246.25	12,253.75	1,155.00	11,098.75	−9%
6	48,600.00	33,895.50	14,704.50	1,155.00	13,549.50	−8%
7	56,700.00	39,544.75	17,155.25	1,155.00	16,000.25	−7%
8	64,800.00	45,194.00	19,606.00	1,155.00	18,451.00	−6%
9	72,900.00	50,843.25	22,056.75	1,155.00	20,901.75	−5%
10	81,000.00	56,492.50	24,507.50	1,155.00	23,352.50	−5%

2. Identification of Affected Intervals along the Motorway Alignment

Based on the calculations above, the assessment of net income loss should focus on parcels where the residual area is approximately 1 da (less than 2 da) and where the additional access distance is 2 km or more. The list of underpasses and overpasses along the motorway alignment is provided in Table 6. According to this list, of the 82 underpasses and overpasses along the route, 11 have a separation distance from the previous structure exceeding 2 km. For these intervals, an income loss assessment should be conducted for residual parcels of less than 2 da. An indicative estimate of income loss has been prepared in order to inform the RAP fund; however, for the purposes of determining the actual income loss compensation to be paid, a more accurate calculation should be undertaken on the basis of household survey data collected from the affected area.

Table 6. Distances between Underpasses and Overpasses along the Motorway Alignment

No.	Structure	Chainage (km)	Distance to Previous (km)	No.	Structure	Chainage (km)	Distance to Previous (km)
1	Underpass	1+298	–	**42**	Underpass	48+217	1.057
2	Underpass	1+744	0.446	**43**	Overpass	49+470	1.253
3	Underpass	2+374	1.076	**44**	Overpass	51+420	1.950
4	Underpass	3+457	1.083	**45**	Underpass	51+850	0.430
5	Underpass	3+841	1.467	**46**	Overpass	53+625	1.775
6	Overpass	4+193	0.352	**47**	Underpass	56+268	**2.643**
7	Overpass	5+079	0.886	**48**	Underpass	58+193	1.925
8	Underpass	6+482	1.403	**49**	Overpass	59+294	1.101
9	Underpass	6+555	0.073	**50**	Overpass	60+350	1.056
10	Overpass	7+904	1.349	**51**	Underpass	61+359	1.009
11	Overpass	8+512	0.608	**52**	Overpass	63+823	**2.464**
12	Overpass	10+300	1.788	**53**	Overpass	65+781	1.958
13	Overpass	11+024	0.724	**54**	Underpass	66+590	0.809
14	Underpass	12+164	1.140	**55**	Overpass	67+851	1.261
15	Underpass	13+212	1.048	**56**	Overpass	68+270	0.419

No.	Structure	Chainage (km)	Distance to Previous (km)	No.	Structure	Chainage (km)	Distance to Previous (km)
16	Overpass	13+979	0.767	**57**	Underpass	70+437	**2.167**
17	Overpass	15+176	1.197	**58**	Underpass	71+703	1.266
18	Underpass	16+523	1.347	**59**	Overpass	72+903	1.200
19	Underpass	16+773	0.250	**60**	Overpass	73+273	0.370
20	Underpass	17+455	0.682	**61**	Overpass	75+729	**2.456**
21	Underpass	17+723	0.268	**62**	Overpass	77+302	1.523
22	Overpass	19+794	**2.339**	**63**	Underpass	78+636	1.334
23	Overpass	20+085	0.291	**64**	Underpass	79+041	0.405
24	Overpass	23+440	**3.355**	**65**	Underpass	80+249	1.208
25	Overpass	23+937	0.497	**66**	Underpass	82+757	**2.508**
26	Overpass	24+196	0.259	**67**	Underpass	83+307	0.550
27	Underpass	24+791	0.595	**68**	Underpass	84+528	1.221
28	Overpass	26+714	1.923	**69**	Underpass	84+952	0.424
29	Overpass	29+407	**2.693**	**70**	Overpass	86+653	1.701
30	Overpass	30+236	0.829	**71**	Overpass	88+547	1.894
31	Underpass	31+746	1.510	**72**	Underpass	90+304	1.757
32	Underpass	34+532	**2.786**	**73**	Underpass	91+218	0.914
33	Overpass	35+910	1.378	**74**	Underpass	91+412	0.194
34	Overpass	37+608	1.698	**75**	Overpass	92+333	0.921
35	Underpass	38+445	0.837	**76**	Overpass	93+735	1.402
36	Underpass	39+384	0.939	**77**	Overpass	94+678	0.943
37	Overpass	41+170	1.786	**78**	Underpass	96+571	1.893
38	Underpass	42+748	1.578	**79**	Overpass	99+343	**2.772**
39	Underpass	43+227	0.479	**80**	Underpass	100+605	1.262
40	Underpass	44+401	1.177	**81**	Underpass	103+718	**3.113**
41	Overpass	47+160	**2.759**	**82**	Overpass	104+651	0.933

Note: Distances exceeding 2 km from the preceding structure are shown in bold red. These intervals require detailed assessment of net income loss for residual parcels of less than 2 da.

The chainage intervals listed in Table 7 indicate the sections of the motorway where the income loss assessment should be conducted. For this purpose, parcels with a residual area of less than 2,000 m² (2 da) following expropriation were enumerated within these intervals. The total number of parcels with a residual area of less than 2 da located within the verified intervals was identified as 62. Net income loss was calculated approximately, based on the projected (linear) access distance only — noting that the actual access distance is likely to be greater — and on the wheat crop alone.

Table 7. Chainage Intervals to be Investigated for Income Loss on Residual Parcels

No.	Chainage – From	Chainage – To
1	17+455	19+794
2	20+085	23+440
3	26+714	29+407
4	31+746	34+532
5 *	53+625	56+268
6 *	61+359	63+823
7 *	68+270	70+437
8	73+273	75+729
9	80+249	82+757
10	96+571	99+343
11	100+605	103+718

(*) For these intervals, the parcel listings could not be obtained and a verification check could not therefore be conducted.

3. Monetary Estimate of Net Income Loss on Residual Parcels

The proportional net income losses range from a minimum of 14% to a maximum of 100% (parcel 184/6 in Çeşmeli neighbourhood). For the latter parcel, the entire value of the residual parcel has been treated as the net income loss. Across the 62 holdings identified, the average net income loss is 36%.

The unit values applied are taken from the valuation reports for Süleymanpaşa and Malkara districts. For Çorlu and Marmara Ereğlisi districts, where valuation reports were not available, an indicative minimum unit value has been applied to estimate the value of the residual parcels. Once an approximate value has been established for each residual parcel, this value is multiplied by the percentage net income loss to obtain the estimated net income loss in TRY for the residual portion. On this basis, the total estimated net income loss across the 62 parcels is TRY 8,522,972.44.

The most common rotation in the area is wheat–sunflower. However, since the net income from sunflower is lower than that from wheat, calculations based on wheat alone are sufficient: a wheat–sunflower rotation would yield a lower net income and therefore a higher net income loss. The figures presented are intended to illustrate the existence of net income losses on the residual parcels and to provide an order-of-magnitude estimate only. Parcel-specific net income losses should be determined through a dedicated investigation of each residual parcel.

Table 8. Indicative Monetary Estimate of Net Income Loss on Residual Parcels following Expropriation

No.	District	Neighbourhood	Block	Parcel	Residual Area (m²)	Add. Distance (km)	Net Income (TRY)	Add. Cost (TRY)	Revised Income (TRY)	Loss (%)	Unit Value (TRY/m²) *	Residual Value (TRY)	Income Loss on Residual (TRY)
1	Çorlu	Seymen	104	16	1,232.25	2.339	3,019.94	540.31	2,479.63	−18%	400.00	492,900.00	88,722.00
2	Çorlu	Seymen	104	34	1,020.36	2.339	2,500.65	540.31	1,960.34	−22%	400.00	408,144.00	89,791.68
3	Çorlu	Seymen	105	22	802.52	2.339	1,966.78	540.31	1,426.47	−27%	400.00	321,008.00	86,672.16
4	Çorlu	Seymen	105	69	1,569.29	2.339	3,845.94	540.31	3,305.63	−14%	400.00	627,716.00	87,880.24
5	Çorlu	Seymen	105	40	1,233.30	2.339	3,022.51	540.31	2,482.20	−18%	400.00	493,320.00	88,797.60
6	Çorlu	Seymen	105	48	868.37	2.339	2,128.16	540.31	1,587.85	−25%	400.00	347,348.00	86,837.00
7	Çorlu	Seymen	115	72	1,140.74	2.339	2,795.67	540.31	2,255.36	−19%	400.00	456,296.00	86,696.24
8	Çorlu	Seymen	114	76	1,203.09	3.355	2,948.47	775.01	2,173.47	−26%	400.00	481,236.00	125,121.36
9	Çorlu	Seymen	9	3	1,633.70	3.355	4,003.79	775.01	3,228.79	−19%	400.00	653,480.00	124,161.20
10	Çorlu	Seymen	94	12	1,120.27	3.355	2,745.50	775.01	1,970.50	−28%	400.00	448,108.00	125,470.24
11	M. Ereğl	Yakuplu	207	177	1,424.06	3.355	3,490.02	775.01	2,715.01	−22%	400.00	569,624.00	125,317.28
12	M. Ereğl	Yakuplu	207	167	1,717.31	3.355	4,208.70	775.01	3,433.69	−18%	400.00	686,924.00	123,646.32
13	Çorlu	Şahpaz	0	989	925.01	2.693	2,266.97	622.08	1,644.89	−27%	400.00	370,004.00	99,901.08
14	Çorlu	Şahpaz	0	1016	1,859.68	2.693	4,557.61	622.08	3,935.53	−14%	400.00	743,872.00	104,142.08
15	Çorlu	Şahpaz	0	1114	1,716.10	2.693	4,205.73	622.08	3,583.65	−15%	400.00	686,440.00	102,966.00
16	M. Ereğl	Çeşmeli	184	5	1,429.49	5.674	3,503.32	1,310.69	2,192.63	−37%	400.00	571,796.00	211,564.52
17	M. Ereğl	Çeşmeli	184	6	504.15	5.674	1,235.55	1,310.69	−75.15	−100%	400.00	201,660.00	201,660.00
18	M. Ereğl	Çeşmeli	184	1	1,454.05	5.674	3,563.51	1,310.69	2,252.82	−37%	400.00	581,620.00	215,199.40
19	M. Ereğl	Çeşmeli	177	5	1,162.50	5.674	2,849.00	1,310.69	1,538.30	−46%	400.00	465,000.00	213,900.00
20	Çorlu	Türkgücü	0	3657	708.21	5.674	1,735.65	1,310.69	424.95	−76%	400.00	283,284.00	215,295.84
21	Çorlu	Türkgücü	0	3651	1,433.90	5.674	3,514.13	1,310.69	2,203.44	−37%	400.00	573,560.00	212,217.20
22	Çorlu	Türkgücü	0	1491	1,374.75	5.674	3,369.17	1,310.69	2,058.47	−39%	400.00	549,900.00	214,461.00
23	S.paşa	Köseilyas	0	929	959.17	5.286	2,350.69	1,221.07	1,129.62	−52%	323.47	310,262.72	161,336.61
24	S.paşa	Köseilyas	0	927	663.61	5.286	1,626.34	1,221.07	405.28	−75%	323.47	214,657.93	160,993.45
25	S.paşa	Köseilyas	0	920	1,893.42	5.286	4,640.30	1,221.07	3,419.23	−26%	323.47	612,464.57	159,240.79
26	S.paşa	Köseilyas	0	667	1,674.66	5.286	4,104.17	1,221.07	2,883.11	−30%	323.47	541,702.27	162,510.68
27	S.paşa	Köseilyas	0	917	1,219.96	5.286	2,989.82	1,221.07	1,768.75	−41%	323.47	394,620.46	161,794.39
28	S.paşa	Köseilyas	0	909	1,128.41	5.286	2,765.45	1,221.07	1,544.38	−44%	323.47	365,006.78	160,602.98
29	S.paşa	Köseilyas	0	962	1,412.16	5.286	3,460.85	1,221.07	2,239.79	−35%	323.47	456,791.40	159,876.99
30	S.paşa	Köseilyas	0	1003	1,093.98	5.286	2,681.07	1,221.07	1,460.01	−46%	323.47	353,869.71	162,780.07
31	S.paşa	Köseilyas	0	1026	1,436.96	5.286	3,521.63	1,221.07	2,300.56	−35%	323.47	464,813.45	162,684.71
32	S.paşa	Köseilyas	0	1029	1,771.36	5.286	4,341.16	1,221.07	3,120.09	−28%	323.47	572,981.82	160,434.91
33	S.paşa	Köseilyas	0	1079	904.68	5.286	2,217.14	1,221.07	996.08	−55%	323.47	292,636.84	160,950.26
34	S.paşa	Köseilyas	0	1080	1,253.53	5.286	3,072.09	1,221.07	1,851.02	−40%	323.47	405,479.35	162,191.74
35	S.paşa	Zafer	345	38	658.79	4.928	1,614.53	1,138.37	476.16	−71%	323.47	213,098.80	151,300.15
36	S.paşa	Zafer	344	22	1,962.24	4.928	4,808.96	1,138.37	3,670.59	−24%	323.47	634,725.77	152,334.19
37	S.paşa	Zafer	344	226	1,540.64	4.928	3,775.72	1,138.37	2,637.36	−30%	323.47	498,350.82	149,505.25
38	S.paşa	Zafer	344	75	1,560.91	4.928	3,825.40	1,138.37	2,687.03	−30%	323.47	504,907.56	151,472.27

No.	District	Neighbourhood	Block	Parcel	Residual Area (m²)	Add. Distance (km)	Net Income (TRY)	Add. Cost (TRY)	Revised Income (TRY)	Loss (%)	Unit Value (TRY/m²) *	Residual Value (TRY)	Income Loss on Residual (TRY)
39	S.paşa	Zafer	344	260	687.88	4.928	1,685.82	1,138.37	547.45	−68%	323.47	222,508.54	151,305.81
40	S.paşa	Zafer	344	207	1,401.15	4.928	3,433.87	1,138.37	2,295.50	−33%	323.47	453,229.99	149,565.90
41	S.paşa	Zafer	344	71	1,540.30	4.928	3,774.89	1,138.37	2,636.52	−30%	323.47	498,240.84	149,472.25
42	S.paşa	Zafer	344	202	912.74	4.928	2,236.90	1,138.37	1,098.53	−51%	323.47	295,244.01	150,574.44
43	S.paşa	Aydoğdu	325	394	798.48	4.334	1,956.87	1,001.15	955.72	−51%	323.47	258,284.33	131,725.01
44	S.paşa	Aydoğdu	325	14	1,163.08	4.334	2,850.42	1,001.15	1,849.26	−35%	323.47	376,221.49	131,677.52
45	S.paşa	Yağcı	0	40	1,455.42	4.334	3,566.87	1,001.15	2,565.72	−28%	323.47	470,784.71	131,819.72
46	S.paşa	Yağcı	0	162	1,887.10	4.334	4,624.81	1,001.15	3,623.66	−22%	323.47	610,420.24	134,292.45
47	S.paşa	Yağcı	0	145	684.79	4.334	1,678.25	1,001.15	677.10	−60%	323.47	221,509.02	132,905.41
48	S.paşa	Nusratlı	0	693	1,335.89	2.456	1,891.43	567.34	1,324.10	−30%	323.47	432,120.34	129,636.10
49	S.paşa	Nusratlı	0	690	1,968.88	2.456	2,787.66	567.34	2,220.32	−20%	323.47	636,873.61	127,374.72
50	S.paşa	Nusratlı	0	691	1,975.75	2.456	2,797.39	567.34	2,230.05	−20%	323.47	639,095.85	127,819.17
51	S.paşa	Nusratfakı	118	54	1,474.48	2.508	2,087.66	579.35	1,508.31	−28%	267.19	393,966.31	110,310.57
52	S.paşa	Nusratfakı	118	53	1,592.26	2.508	2,254.42	579.35	1,675.07	−26%	267.19	425,435.95	110,613.35
53	S.paşa	Nusratfakı	118	52	1,580.97	2.508	2,238.43	579.35	1,659.08	−26%	267.19	422,419.37	109,829.04
54	S.paşa	Nusratfakı	119	1	1,592.09	2.508	2,254.18	579.35	1,674.83	−26%	267.19	425,390.53	110,601.54
55	Malkara	Yenice	125	22	893.66	2.772	1,265.30	640.33	624.97	−51%	211.91	189,375.49	96,581.50
56	Malkara	Yenice	135	12	1,172.57	2.772	1,660.19	640.33	1,019.86	−39%	211.91	248,479.31	96,906.93
57	Malkara	Yenice	129	12	1,475.94	2.772	2,089.72	640.33	1,449.39	−31%	211.91	312,766.45	96,957.60
58	Malkara	Hereke	0	545	1,628.32	3.113	2,305.47	719.10	1,586.37	−31%	250.61	408,073.28	126,502.72
59	Malkara	Ahievren	0	307	1,943.23	3.113	2,751.34	719.10	2,032.24	−26%	218.97	425,509.07	110,632.36
60	Malkara	Ahievren	0	336	1,335.76	3.113	1,891.25	719.10	1,172.15	−38%	218.97	292,491.37	111,146.72
61	Malkara	Ahievren	0	337	1,712.49	3.113	2,424.65	719.10	1,705.54	−30%	218.97	374,983.94	112,495.18
62	Malkara	Ahievren	0	338	622.63	3.113	881.56	719.10	162.45	−82%	218.97	136,337.29	111,796.58
											TOTAL	27,019,371.56	8,522,972.44

(*) Unit values applied: Nusratlı – TRY 323.47/m²; Nusratfakı – TRY 267.19/m²; Ahievren – TRY 218.97/m²; Hereke – TRY 250.61/m²; Yenice – TRY 211.91/m². For the parcels east of Süleymanpaşa (Köseilyas, Zafer, Aydoğdu and Yağcı), a unit value of TRY 323.47/m² has been applied.

(**) For the neighbourhoods in Marmara Ereğlisi and Çorlu districts, valuation reports were not available; an indicative unit value of TRY 400/m² has therefore been applied.

Note: The percentage figure of 100% in row 17 (parcel 184/6, Çeşmeli) reflects total loss of net income, as the additional access cost exceeds the net income generated by the residual parcel.

References

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Appendix C – List of Parcels Containing Affected Trees

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
Section 1 (KM 0-35)							
Silivri	Çeltik	172	37	Private	Walnut (Ceviz)	--	--
Silivri	Çeltik	172	38	Private	Walnut (Ceviz) Almond (Badem)	--	--
Silivri	Çeltik	172	39	Private	Walnut (Ceviz) Almond (Badem)	--	--
Silivri	Çeltik	172	40	Private	Locust (Akasya)	--	--
Silivri	Çeltik	172	41	Private	Locust (Akasya)	--	--
Silivri	Çeltik	173	110	Private	Walnut (Ceviz)	--	--
Silivri	Çeltik	173	94	Private	Poplar (Kavak)	--	--
Silivri	Çeltik	173	97	Private	Poplar (Kavak)	--	--
Silivri	Çeltik	173	93	Private	Poplar (Kavak)	--	--
Silivri	Çeltik	173	95	Private	Poplar (Kavak)	--	--
Silivri	Çeltik	173	111	Private	Walnut (Ceviz)	--	--
Silivri	Çeltik	173	98	Private	Walnut (Ceviz) Cherry (Kiraz)	--	--
Silivri	Çeltik	173	96	Private	Poplar (Kavak)	--	--
Silivri	Çeltik	173	6	Private	Apricot (Kayısı) Plum (Erik) Pine (Çam) Almond (Badem) Walnut (Ceviz) Grapevine (Asma) Japanese Plum (Yenidünya) Quince (Ayva) Cherry (Kiraz) Fig (İncir) Sour Cherry (Vişne) Pomegranate (Nar) Peach (Şeftali)	--	--
Silivri	Çeltik	173	9	Private	Cherry (Kiraz) Persimmon (Trabzon Hurması) Plum (Erik) Peach (Şeftali) Apricot (Kayısı) Walnut (Ceviz) Apple (Elma) Pine (Çam) Quince (Ayva) Jujube (Hünnap) Japanese Plum (Yenidünya) Olive (Zeytin)	--	--
Silivri	Çeltik	183	37	Private	Pomegranate (Nar) Japanese Plum (Yenidünya) Apple (Elma) Sour Cherry (Vişne) Cherry (Kiraz) Olive (Zeytin) Walnut (Ceviz) Pear (Armut) Apricot (Kayısı) Laurel (Defne) Grapevine (Asma)	--	--
Silivri	Çeltik	183	121	Private	Fig (İncir) Pear (Armut) Apricot (Kayısı) Walnut (Ceviz) Cherry (Kiraz) Jujube (Hünnap) Sour Cherry (Vişne) Pine (Çam) Plum (Erik) Apple (Elma) Chestnut (Kestane) Almond (Badem) Pomegranate (Nar) Quince (Ayva)	--	--
Silivri	Çeltik	183	40	Private	Walnut (Ceviz) Sour Cherry (Vişne) Apple (Elma) Peach (Şeftali) Cherry (Kiraz) Lemon (Limon) Plum (Erik) Apricot (Kayısı)	--	--

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
Silivri	Çeltik	183	44	Private	Pine (Çam) Grapevine (Asma) Walnut (Ceviz)	--	--
Silivri	Çeltik	183	14	Private	Pine (Çam) Apple (Elma) Walnut (Ceviz) Persimmon (Trabzon Hurması) Silverberry (İğde) Apricot (Kayısı) Mulberry (Dut) Pear (Armut) Fig (İncir) Pomegranate (Nar) Japanese Plum (Yenidünya) Sour Cherry (Vişne) Peach (Şeftali) Grapevine (Asma) Cherry (Kiraz) Quince (Ayva) Olive (Zeytin) Almond (Badem)	--	--
Silivri	Çeltik	183	15	Private	Walnut (Ceviz) Apple (Elma) Sour Cherry (Vişne) Pine (Çam) Olive (Zeytin) Cherry (Kiraz) Apricot (Kayısı) Fig (İncir) Pear (Armut)	--	--
Silivri	Çeltik	183	12	Private	Grapevine (Asma) Cherry (Kiraz) Walnut (Ceviz) Laurel (Defne) Pine (Çam) Apple (Elma) Pear (Armut) Japanese Plum (Yenidünya) Sour Cherry (Vişne) Olive (Zeytin) Pomegranate (Nar)	--	--
Silivri	Çeltik	180	22	Private	Pear (Armut) Apricot (Kayısı) Almond (Badem) Grapevine (Asma) Walnut (Ceviz) Lemon (Limon) Apple (Elma) Plum (Erik) Olive (Zeytin) Pomegranate (Nar) Linden (Ihlamur) Quince (Ayva) Silverberry (İğde) Pine (Çam) Jujube (Hünnap) Japanese Plum (Yenidünya) Laurel (Defne) Persimmon (Trabzon Hurması) Peach (Şeftali) Mulberry (Dut) Fig (İncir)	--	--
Silivri	Çeltik	180	20	Private	Pomegranate (Nar) Pear (Armut) Apricot (Kayısı) Sour Cherry (Vişne) Quince (Ayva) Walnut (Ceviz)	--	--
Silivri	Çeltik	180	19	Private	Sour Cherry (Vişne) Apple (Elma) Pear (Armut) Cherry (Kiraz) Plum (Erik)	--	--
Silivri	Sancaktepe	244	21	Private	Walnut (Ceviz) Plum (Erik)	--	--
Silivri	Sancaktepe	243	16	Private	Spruce (Çam-Ladin) Cherry (Kiraz)	--	--
Silivri	Sancaktepe	243	19	Private	Fig (İncir) Plum (Erik)	--	--

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
Silivri	Sancaktepe	243	5	Private	Fig (İncir)	--	--
Silivri	Sancaktepe	233	91	Private	Pomegranate (Nar)	--	--
					Walnut (Ceviz)		
					Fig (İncir)		
					Grapevine (Asma)		
					Cherry (Kiraz)		
Silivri	Sancaktepe	233	87	Private	Pomegranate (Nar)	--	--
					Pine (Çam)		
Silivri	Sancaktepe	233	90	Private	Quince (Ayva)	--	--
					Olive (Zeytin)		
					Walnut (Ceviz)		
					Medlar (Muşmula)		
					Jujube (Hünnap)		
					Plum (Erik)		
					Cherry (Kiraz)		
					Pear (Armut)		
					Apricot (Kayısı)		
					Grapevine (Asma)		
					Chestnut (Kestane)		
					Spruce (Çam-Ladin)		
					Sour Cherry (Vişne)		
					Fig (İncir)		
Silivri	Sancaktepe	233	86	Private	Walnut (Ceviz)	--	--
Silivri	Sancaktepe	233	85	Private	Fig (İncir)	--	--
Silivri	Sancaktepe	233	54	Private	Walnut (Ceviz)	--	--
Silivri	Sancaktepe	233	53	Private	Fig (İncir)	--	--
Silivri	Sancaktepe	232	34	Private	Walnut (Ceviz)	--	--
					Medlar (Muşmula)		
					Grapevine (Asma)		
Silivri	Sancaktepe	233	16	Private	Almond (Badem)	--	--
Silivri	Sancaktepe	233	6	Private	Sour Cherry (Vişne)	--	--
					Plum (Erik)		
					Pomegranate (Nar)		
Silivri	Sancaktepe	232	20	Private	Grapevine (Asma)	--	--
					Walnut (Ceviz)		
					Almond (Badem)		
Silivri	Sancaktepe	232	16	Private	Medlar (Muşmula)	--	--
Silivri	Sancaktepe	131	46	Private	Walnut (Ceviz)	--	--
					Apple (Elma)		
					Quince (Ayva)		
					Olive (Zeytin)		
Silivri	Sancaktepe	131	39	Private	Apricot (Kayısı)	--	--
					Sour Cherry (Vişne)		
					Olive (Zeytin)		
					Cherry (Kiraz)		
					Pine (Çam)		
					Walnut (Ceviz)		
					Plum (Erik)		
					Almond (Badem)		
					Mulberry (Dut)		
					Pomegranate (Nar)		
					Fig (İncir)		
					Peach (Şeftali)		
					Quince (Ayva)		
					Silverberry (İğde)		
Silivri	Sancaktepe	131	40	Private	Pine (Çam)	--	--
					Sour Cherry (Vişne)		
					Plum (Erik)		
					Apricot (Kayısı)		
					Cherry (Kiraz)		
Silivri	Sancaktepe	131	1	Private	Apricot (Kayısı)	--	--
					Olive (Zeytin)		
					Pomegranate (Nar)		
					Laurel (Defne)		
Silivri	Sancaktepe	131	23	Private	Walnut (Ceviz)	--	--
					Sour Cherry (Vişne)		
					Plum (Erik)		
Silivri	Sancaktepe	131	21	Private	Fig (İncir)	--	--
Silivri	Sancaktepe	131	5	Private	Fig (İncir)	--	--
					Plum (Erik)		
Silivri	Sancaktepe	130	2	Private	Walnut (Ceviz)	--	--
					Fig (İncir)		
					Peach (Şeftali)		
					Pomegranate (Nar)		
					Apricot (Kayısı)		
					Quince (Ayva)		
					Plum (Erik)		
					Pear (Armut)		
					Grapevine (Asma)		

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
					Apple (Elma)		
					Cherry (Kiraz)		
					Locust (Akasya)		
Silivri	Sancaktepe	131	6	Private	Fig (İncir)	--	--
					Plum (Erik)		
Silivri	Balaban	731	18	Private	Plum (Erik)	--	--
					Olive (Zeytin)		
					Fig (İncir)		
Silivri	Balaban	732	153	Private	Peach (Şeftali)	--	--
					Sour Cherry (Vişne)		
					Cherry (Kiraz)		
					Quince (Ayva)		
					Persimmon (Trabzon Hurması)		
					Pomegranate (Nar)		
					Laurel (Defne)		
Silivri	Balaban	731	17	Private	Quince (Ayva)	--	--
					Almond (Badem)		
					Apricot (Kayısı)		
					Walnut (Ceviz)		
					Jujube (Hünnap)		
					Sour Cherry (Vişne)		
					Pine (Çam)		
					Peach (Şeftali)		
					Cherry (Kiraz)		
					Grapevine (Asma)		
					Pear (Armut)		
Silivri	Balaban	731	15	Private	Walnut (Ceviz)	--	--
					Plum (Erik)		
Silivri	Balaban	732	120	Private	Grapevine (Asma)	--	--
					Peach (Şeftali)		
					Walnut (Ceviz)		
					Fig (İncir)		
					Mandarin (Mandalina)		
					Cherry (Kiraz)		
					Pomegranate (Nar)		
					Apple (Elma)		
					Pine (Çam)		
					Japanese Plum (Yenidünya)		
					Mulberry (Dut)		
					Plum (Erik)		
					Apricot (Kayısı)		
					Laurel (Defne)		
					Lemon (Limon)		
					Pear (Armut)		
					Olive (Zeytin)		
Silivri	Balaban	732	115	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
Silivri	Balaban	732	123	Private	Fig (İncir)	--	--
Silivri	Balaban	732	117	Private	Walnut (Ceviz)	--	--
					Apricot (Kayısı)		
					Mulberry (Dut)		
Silivri	Balaban	732	124	Private	Walnut (Ceviz)	--	--
					Apricot (Kayısı)		
Silivri	Balaban	732	111	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	110	Private	Fig (İncir)	--	--
Silivri	Balaban	732	109	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
					Walnut (Ceviz)		
Silivri	Balaban	732	112	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	70	Private	Pear (Armut)	--	--
Silivri	Balaban	732	125	Private	Fig (İncir)	--	--
Silivri	Balaban	732	105	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	127	Legal Entities	Apricot (Kayısı)	--	--
					Walnut (Ceviz)		
Silivri	Balaban	732	126	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	129	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	147	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
Silivri	Balaban	732	96	Private	Apricot (Kayısı)	--	--
Silivri	Balaban	732	98	Private	Apricot (Kayısı)	--	--
					Japanese Plum (Yenidünya)		
					Fig (İncir)		
					Almond (Badem)		
					Olive (Zeytin)		
					Plum (Erik)		
					Quince (Ayva)		
					Pine (Çam)		
					Cherry (Kiraz)		
					Apple (Elma)		

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
					Walnut (Ceviz)		
Silivri	Balaban	732	103	Private	Fig (İncir)	--	--
					Apricot (Kayısı)		
Silivri	Balaban	732	92	Private	Quince (Ayva)	--	--
					Apricot (Kayısı)		
					Pear (Armut)		
					Cherry (Kiraz)		
					Peach (Şeftali)		
					Plum (Erik)		
					Persimmon (Trabzon Hurması)		
Silivri	Balaban	732	95	Private	Fig (İncir)	--	--
Silivri	Balaban	732	102	Private	Plum (Erik)	--	--
					Walnut (Ceviz)		
Silivri	Balaban	732	90	Private	Olive (Zeytin)	--	--
					Cornel (Kızılcık)		
Silivri	Balaban	732	87	Private	Apple (Elma)	--	--
Silivri	Balaban	732	88	Private	Fig (İncir)	--	--
					Walnut (Ceviz)		
Silivri	Balaban	732	86	Private	Pine (Çam)	--	--
					Almond (Badem)		
Silivri	Balaban	732	21	Private	Plum (Erik)	--	--
					Cherry (Kiraz)		
Silivri	Balaban	732	26	Private	Mulberry (Dut)	--	--
Silivri	Balaban	732	85	Private	Walnut (Ceviz)	--	--
					Fig (İncir)		
					Sour Cherry (Vişne)		
					Lemon (Limon)		
					Peach (Şeftali)		
					Apricot (Kayısı)		
					Plum (Erik)		
					Pear (Armut)		
					Quince (Ayva)		
					Cherry (Kiraz)		
Silivri	Balaban	732	23	Private	Olive (Zeytin)	--	--
					Almond (Badem)		
					Apricot (Kayısı)		
					Sour Cherry (Vişne)		
					Fig (İncir)		
					Peach (Şeftali)		
					Cherry (Kiraz)		
					Quince (Ayva)		
Silivri	Balaban	733	21	Private	Fig (İncir)	--	--
Silivri	Balaban	732	80	Private	Silverberry (İğde)	--	--
					Quince (Ayva)		
					Walnut (Ceviz)		
					Fig (İncir)		
					Olive (Zeytin)		
					Pomegranate (Nar)		
					Cumquat (Kumkuat)		
					Pear (Armut)		
					Apple (Elma)		
					Peach (Şeftali)		
					Medlar (Muşmula)		
					Almond (Badem)		
					Sour Cherry (Vişne)		
					Plum (Erik)		
					Lemon (Limon)		
					Pine (Çam)		
					Apricot (Kayısı)		
Silivri	Balaban	732	76	Private	Pine (Çam)	--	--
Silivri	Balaban	734	158	Private	Olive (Zeytin)	--	--
					Walnut (Ceviz)		
					Hazelnut (Fındık)		
Silivri	Balaban	734	157	Private	Quince (Ayva)	--	--
					Olive (Zeytin)		
					Fig (İncir)		
					Walnut (Ceviz)		
Silivri	Balaban	734	156	Private	Fig (İncir)	--	--
					Walnut (Ceviz)		
					Olive (Zeytin)		
					Quince (Ayva)		
Silivri	Balaban	734	126	Private	Pine (Çam)	--	--
Silivri	Balaban	734	124	Private	Pine (Çam)	--	--
Silivri	Balaban	734	133	Private	Almond (Badem)	--	--
Silivri	Balaban	734	154	Private	Almond (Badem)	--	--
					Grapevine (Asma)		
					Mulberry (Dut)		
					Peach (Şeftali)		
					Apricot (Kayısı)		

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
					Olive (Zeytin)		
					Sour Cherry (Vişne)		
					Silverberry (İğde)		
					Walnut (Ceviz)		
					Plum (Erik)		
					Quince (Ayva)		
					Fig (İncir)		
					Pear (Armut)		
					Pomegranate (Nar)		
Silivri	Balaban	734	153	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
Silivri	Balaban	734	118	Private	Walnut (Ceviz)	--	--
Silivri	Balaban	734	134	Private	Pomegranate (Nar)	--	--
					Almond (Badem)		
					Hazelnut (Fındık)		
					Fig (İncir)		
					Walnut (Ceviz)		
					Linden (Ihlamur)		
					Persimmon (Trabzon Hurması)		
					Laurel Cherry (Karayemiş)		
					Japanese Plum (Yenidünya)		
					Apricot (Kayısı)		
					Jujube (Hünnap)		
					Pear (Armut)		
					Grapevine (Asma)		
					Laurel (Defne)		
					Mulberry (Dut)		
					Olive (Zeytin)		
					Apple (Elma)		
					Quince (Ayva)		
					Peach (Şeftali)		
					Plum (Erik)		
					Sour Cherry (Vişne)		
Silivri	Balaban	734	115	Private	Mulberry (Dut)	--	--
					Quince (Ayva)		
					Walnut (Ceviz)		
Silivri	Balaban	734	136	Private	Fig (İncir)	--	--
					Apricot (Kayısı)		
					Almond (Badem)		
					Quince (Ayva)		
Silivri	Balaban	734	138	Private	Fig (İncir)	--	--
					Apricot (Kayısı)		
					Walnut (Ceviz)		
Silivri	Balaban	734	98	Private	Plum (Erik)	--	--
					Apricot (Kayısı)		
Silivri	Balaban	734	137	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
Silivri	Balaban	734	114	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
					Quince (Ayva)		
					Walnut (Ceviz)		
Silivri	Balaban	734	112	Private	Apricot (Kayısı)	--	--
					Fig (İncir)		
Silivri	Balaban	734	113	Private	Apricot (Kayısı)	--	--
					Spruce (Çam-Ladin)		
					Fig (İncir)		
Silivri	Balaban	734	104	Private	Quince (Ayva)	--	--
					Pine (Çam)		
					Sour Cherry (Vişne)		
					Silverberry (İğde)		
					Walnut (Ceviz)		
					Plum (Erik)		
Silivri	Balaban	734	105	Private	Walnut (Ceviz)	--	--
					Apricot (Kayısı)		
					Fig (İncir)		
Silivri	Balaban	734	102	Private	Fig (İncir)	--	--
Silivri	Balaban	756	88	Private	Black Poplar (Karaağaç)	--	--
Silivri	Değirmenköy	462	64	Private	Mulberry (Dut)	--	--
Silivri	Değirmenköy	462	60	Private	Almond (Badem)	--	--
					Quince (Ayva)		
					Apricot (Kayısı)		
					Walnut (Ceviz)		
					Pomegranate (Nar)		
Silivri	Değirmenköy	368	144	Private	Sour Cherry (Vişne)	--	--
					Olive (Zeytin)		
					Pear (Armut)		
					Plum (Erik)		
					Linden (Ihlamur)		
					Apple (Elma)		

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
					Pomegranate (Nar)		
					Jujube (Hünnap)		
					Fig (İncir)		
					Almond (Badem)		
					Cherry (Kiraz)		
					Peach (Şeftali)		
Silivri	Değirmenköy	367	434	Private	Willow (Söğüt)	--	--
Silivri	Gümüşyaka	7878	7	Private	Locust (Akasya)	--	--
Silivri	Gümüşyaka	7878	5	Private	Plum (Erik)	--	--
Silivri	Gümüşyaka	7878	1	Private	Willow (Söğüt)	--	--
					Quince (Ayva)		
					Pine (Çam)		
					Walnut (Ceviz)		
					Peach (Şeftali)		
					Apple (Elma)		
					Grapevine (Asma)		
Silivri	Gümüşyaka	7860	17	Private	Pine (Çam)	--	--
					Plum (Erik)		
					Locust (Akasya)		
Çorlu	Seymen	104	42	Private	Cherry (Kiraz)	--	--
					Pear (Armut)		
					Spruce (Çam-Ladin)		
					Sour Cherry (Vişne)		
					Apple (Elma)		
					Hazelnut (Fındık)		
					Plum (Erik)		
					Peach (Şeftali)		
					Pomegranate (Nar)		
					Apricot (Kayısı)		
					Mulberry (Dut)		
					Quince (Ayva)		
Çorlu	Seymen	115	69	Private	Jujube (Hünnap)	--	--
					Plum (Erik)		
					Cherry (Kiraz)		
					Almond (Badem)		
					Spruce (Çam-Ladin)		
					Cypress (Servi)		
					Mulberry (Dut)		
					Japanese Plum (Yenidünya)		
					Pear (Armut)		
					Pomegranate (Nar)		
					Apple (Elma)		
					Walnut (Ceviz)		
					Quince (Ayva)		
					Rock Cherry (Mahlep)		
					Fig (İncir)		
Çorlu	Seymen	114	80	Private	Black Poplar (Karaağaç)	--	--
Çorlu	Seymen	114	99	Private	Black Poplar (Karaağaç)	--	--
Çorlu	Seymen	9	36	Private	Willow (Söğüt)	--	--
Çorlu	Seymen	54	27	Private	Olive (Zeytin)	--	--
					Spruce (Çam-Ladin)		
					Mastic Tree (Kavlan)		
Çorlu	Şahpaz	0	837	Private	Plum (Erik)	--	--
					Willow (Söğüt)		
					Peach (Şeftali)		
Çorlu	Şahpaz	0	1199	Private	Walnut (Ceviz)	--	--
Çorlu	Şahpaz	0	1160	Private	Black Poplar (Karaağaç)	--	--
Çorlu	Şahpaz	0	680	Private	Oak (Meşe)	--	--
Çorlu	Şahpaz	0	681	Private	Oak (Meşe)	--	--
Çorlu	Şahpaz	0	690	Private	Oak (Meşe)	--	--
					Rock Cherry (Mahlep)		
Çorlu	Şahpaz	0	702	Private	Oak (Meşe)	--	--
Çorlu	Şahpaz	0	706	Private	Oak (Meşe)	--	--
Çorlu	Şahpaz	0	1114	Private	Oak (Meşe)	--	--
					Willow (Söğüt)		
Çorlu	Şahpaz	0	1102	Private	Willow (Söğüt)	--	--
Marmaraereğlisi	Türkmenli	109	13	Private	Willow (Söğüt)	--	--
Marmaraereğlisi	Türkmenli	109	12	Private	Ash (Dişbudak)	--	--
Marmaraereğlisi	Çeşmeli	174	5	Private	Pear (Armut)	--	--
Marmaraereğlisi	Çeşmeli	163	17	Private	Ash (Dişbudak)	--	--
Marmaraereğlisi	Sultanköy	116	10	Private	Cypress (Servi)	--	--
Marmaraereğlisi	Cedit Ali Paşa	354	40	Private	Fig (İncir)	--	--
					Almond (Badem)		
					Plum (Erik)		
					Quince (Ayva)		
					Walnut (Ceviz)		
					Spruce (Çam-Ladin)		
					Pear (Armut)		
					Cherry (Kiraz)		

District	Neighbourhood	Block No.	Parcel No.	Ownership Status	Tree Type	Age (Years)	Quantity
					Persimmon (Trabzon Hurması)		
					Apricot (Kayısı)		
					Apple (Elma)		
					Peach (Şeftali)		
Marmaraereğlisi	Yakuplu	195	48	Private	Walnut (Ceviz)	--	--
Marmaraereğlisi	Yakuplu	196	14	Private	Ash (Dişbudak)	--	--
					Locust (Akasya)		
Marmaraereğlisi	Yakuplu	207	41	Private	Spruce (Çam-Ladin)	--	--
					Walnut (Ceviz)		
Marmaraereğlisi	Yakuplu	207	42	Private	Hazelnut (Fındık)	--	--
					Persimmon (Trabzon Hurması)		
					Sour Cherry (Vişne)		
					Fig (İncir)		
					Spruce (Çam-Ladin)		
					Walnut (Ceviz)		
					Apple (Elma)		
Section 3 (KM 70-105)							
Süleymanpaşa	Seymenli	107	1	Private	Black Poplar (Karaağaç)	35	9
					Pear (Armut)	35	2
					Poplar (Kavak)	15	1
					Black Poplar (Karaağaç)	15	2
Süleymanpaşa	Seymenli	107	3	Private	Pear (Armut)	30	2
					Black Poplar (Karaağaç)	30	8
Süleymanpaşa	Seymenli	107	12	Private	Black Poplar (Karaağaç)	10	3
Süleymanpaşa	Seymenli	107	11	Private	Black Poplar (Karaağaç)	20	12
Süleymanpaşa	Seymenli	107	9	Private	Black Poplar (Karaağaç)	20	26
Süleymanpaşa	Seymenli	107	10	Private	Black Poplar (Karaağaç)	20	24
Süleymanpaşa	Seymenli	107	77	Private	Wild Pear (Y. Armut)	25	29
					Black Poplar (Karaağaç)	25	153
					Oak (Meşe)	25	45
Süleymanpaşa	Seymenli	108	5	Treasury	Linden (Ihlamur)	20	1
					Black Poplar (Karaağaç)	20	2
Süleymanpaşa	Seymenli	113	158	Private	Pine (Çam)	33	41
Süleymanpaşa	Güveçli	109	32	Private	Walnut (Ceviz)	16	8
Süleymanpaşa	Güveçli	109	58	Private	Poplar (Kavak)	20	1
Süleymanpaşa	Güveçli	112	5	Private	Almond (Badem)	42	1
					Pear (Armut)	36	1
Süleymanpaşa	Güveçli	112	3	Private	Austrian Pine (Çam Mazı)	12	34
Süleymanpaşa	Nusratlı	0	1165	Private	Black Poplar (Karaağaç)	40	1
Süleymanpaşa	Nusratlı	0	696	Private	Black Poplar (Karaağaç)	30	8
Süleymanpaşa	Karahisarlı	102	9	Private	Black Poplar (Karaağaç)	30	2
Süleymanpaşa	Karahisarlı	103	1	Common Property – Agriculture	Pear (Armut)	25	3
					Plum (Erik)	15	4
					Black Poplar (Karaağaç)	25	3
Süleymanpaşa	Karahisarlı	103	5	Private	Plum (Erik)	20	2
Süleymanpaşa	Karahisarlı	163	1	Treasury-Forestry	Pear (Armut)	20	1
					Walnut (Ceviz)	3	4
Süleymanpaşa	Nusratfaki	103	13	Private	Pear (Armut)	60	1
Süleymanpaşa	Nusratfaki	118	51	Private	Pine (Çam)	20	3
Süleymanpaşa	Nusratfaki	118	52	Private	Almond (Badem)	36	1
					Pine (Çam)	30	2
					Pear (Armut)	60	1
Süleymanpaşa	Nusratfaki	118	25	Private	Pear (Armut)	60	1
Süleymanpaşa	Nusratfaki	113	45	Private	Grapevine (Asma)	20	3,720
Süleymanpaşa	Nusratfaki	113	44	Private	Walnut (Ceviz)	4	163
Süleymanpaşa	İnecik	156	30	Private	Black Poplar (Karaağaç)	15	1
Süleymanpaşa	İnecik	161	18	Private	Walnut (Ceviz)	20	1
					Quince (Ayva)	20	1
Süleymanpaşa	İnecik	205	110	Private	Grapevine (Asma)	15	18
					Pine (Çam)	5	23
					Pine (Çam)	20	20
					Plum (Erik)	20	1
Süleymanpaşa	İnecik	198	50	Private	Plane Tree (Çınar)	45	1
Süleymanpaşa	Akçahalil	108	29	Private	Oak (Meşe)	60	1
Süleymanpaşa	Akçahalil	102	57	Private	Pear (Armut)	36	1
Malkara	Yenice	129	18	Private	Pear (Armut)	50	1
Malkara	Yenice	129	23	Private	Walnut (Ceviz)	12	32
					Walnut (Ceviz)	5	116
					Walnut (Ceviz)	2	6
Malkara	Yenice	129	22	Private	Poplar (Kavak)	24	4
					Oak (Meşe)	20	9
					Poplar (Kavak)	10	1
					Walnut (Ceviz)	9	6
					Medlar (Muşmula)	14	1
					Mulberry (Dut)	7	3
					Walnut (Ceviz)	5	7
Malkara	Hereke	0	392	Private	Almond (Badem)	26	10

Appendix D – Cut-off Dates in Affected Settlement

Değirmenköy – Fevzipaşa, Silivri
Değirmenköy – İsmetpaşa, Silivri

Cut-off disclosure date: 20.01.2026

2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıdan İndirilme Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında İstanbul İli, Silivri İlçesi, Değirmenköy Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre İstanbul İli, Silivri İlçesi, Değirmenköy Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile ..... tarihinden itibaren askıdan indirilmiştir. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

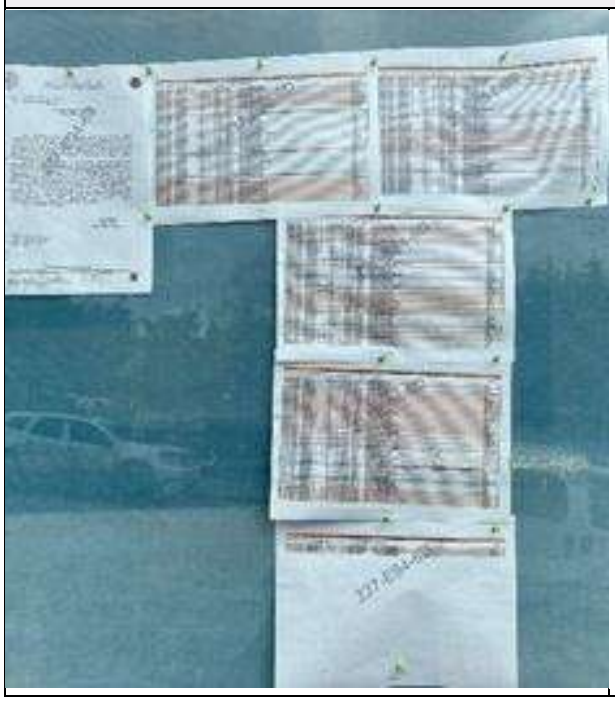
İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

5.2.2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi	Muhtar	Aza
Habip GÜNEŞ	Cemal KÖROĞLU	Serdar AKGÜÇ AZA

Gümüşyaka, Silivri

Cut-off disclosure date: 20.01.2026



2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıdan İndirilme Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında İstanbul İli, Silivri İlçesi, Gümüşyaka Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre İstanbul İli, Silivri İlçesi, Gümüşyaka Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 05.02.2026 tarihinden itibaren askıdan indirilmiştir. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

5.2.2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi	Muhtar	Aza
Habip GÜNEŞ	SİLİVRİ KAYMAKAMLIĞI Gümüşyaka Mahallesi Muhtarlığı Mazlum GÜÇLÜ 5.2.2026	2.AZA Turgut UYGUR

Sultanköy, Marmaraereğlisi

Cut-off disclosure date: 20.01.2026

2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıdan İndirilme Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Marmaraereğlisi İlçesi, Sultanköy Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre Tekirdağ İli, Marmaraereğlisi İlçesi, Sultanköy Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 05/01/2026 tarihinden itibaren askıdan indirilmiştir. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

05/01/2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi	Muhtar	Aza
Habip GÜNEŞ	TEKİRDAĞ İLİ MARMARAEREĞLİSİ İLÇESİ SULTANKÖY MAHALLESİ MUHTARLIĞI	Fikret DEMİREL

Cedit Ali Paşa, Marmaraereğlisi

Cut-off disclosure date: 20.01.2026

2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıdan İndirilme Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Marmaraereğlisi İlçesi, Cedit Ali Paşa Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre Tekirdağ İli, Marmaraereğlisi İlçesi, Cedit Ali Paşa Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 05/01/2026 tarihinden itibaren askıdan indirilmiştir. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

05/01/2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi	Muhtar	Aza
Habip GÜNEŞ	TEKİRDAĞ İLİ MARMARAEREĞLİSİ İLÇESİ CEDİT ALİ PAŞA MAHALLESİ MUHTARLIĞI EMİRE ERGEN	Hakan Ergen

Seymen, Çorlu

Cut-off disclosure date: 20.01.2026

2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıdan İndirilme Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Çorlu İlçesi, Seymen Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre Tekirdağ İli, Çorlu İlçesi, Seymen Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 5.02.2026 tarihinden itibaren askıdan indirilmiştir. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

05.02.2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi — Muhtar — Aza

Hâbip GÜNEŞ

Sancaktepe, Silivri

Cut-off disclosure date: 24.03.2026

T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 / 2089511 — 24.03.2026
Konu : Kınalı-Malkara Askı İlanı

SANCAKTEPE MAHALLE MUHTARLIĞINA
Silivri/İstanbul

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında İstanbul İli, Silivri İlçesi, Sancaktepe Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verişmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanmak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarı büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince, 15.09.2025 tarih ve 2025/94 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması hususunda;

Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

EKLER:
1. Liste
2. Pazarlık Askıdan İndirilme Tutanağı
3. Pazarlık Askıya Çıkarılma Tutanağı

"Bu belge, güvenli elektronik imza ile imzalanmıştır."
Belge Doğrulama Kodu: "kvswqB0192ED" — Belge Doğrulama Adresi: "https://www.turkiye.gov.tr/ilgm-ebys"
Atatürk Mah. Hil Cad. No:22 16140 Osmangazi - BURSA — Bilgi İçin: Aysel YATABEVER, Büro Elemanı
Telefon No : 224 275 1000 — Faks : 224 260 0943 — Tel - Faks: 1823
İnternet Adresi : www.ilgm.gov.tr — KEP: ilgmbursabsb@hs01.kep.tr — e-posta : Aaskin1@ilgm.gov.tr
Dağıtılacak Birim : Taşınmazlar Bölümü(Gereği) -
1/1

Balaban, Silivri

Cut-off disclosure date: 24.03.2026

T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 / 2089510 24.03.2026
Konu : Kınalı-Malkara Askı İlanı

BALABAN MAHALLE MUHTARLIĞINA
Silivri/İstanbul

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında İstanbul İli, Silivri İlçesi, Balaban Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 15.09.2025 tarih ve 2025/94 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması husus unda;

Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

EKLER:
1. Liste
2. Pazarlık Askıdan İndirilme Tutanağı
3. Pazarlık Askıya Çıkarılma Tutanağı

"Bu belge, güvenli elektronik imza ile imzalanmıştır."
Bölge Doğrulama Kodu: "1sikkrBl102DE" Bölge Doğrulama Adresi: "https://www.turkiye.gov.tr/kgm-ebys"
Armutlu Mah. 581 Cad. No:22 16340 Osmangazi - BURSA Bilgi İçin: Aysel YATANSEVER
Büro Elemanı
Telefon No : 224 2757800 Faks: 224 2670945 Tel - Faks: 1923
İnternet Adresi : www.kgm.gov.tr KEP: kgmkurs3@hs01.kep.tr e-posta : Adanal@kgm.gov.tr
İlgili Birim : Taşınmazlar Başmühendisliği

1/1

Yakuplu, Marmaraereğlisi

Cut-off disclosure date: 6 April 2026

T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 / 2098913 03.04.2026
Konu : Kınalı-Malkara Askı İlanı

Paraf Nüshası

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Marmaraereğlisi İlçesi, Yakuplu Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 01.08.2025 tarih ve 2025/67 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması husus unda;

Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

E-Not teslim aldım
Oğuz ALKAN

EKLER:
1. Liste
2. Pazarlık Askıdan İndirilme Tutanağı
3. Pazarlık Askıya Çıkarılma Tutanağı

DAĞITIM:
Yakuplu Mahalle Muhtarlığı (Ek-1, Ek-2, Ek-3 komuldu)

"Bu belge, güvenli elektronik imza ile imzalanmıştır."
Bölge Doğrulama Kodu: "xgwy1Bt4SC0T" Bölge Doğrulama Adresi: "https://www.turkiye.gov.tr/kgm-ebys"
Armutlu Mah. 581 Cad. No:22 16340 Osmangazi - BURSA Bilgi İçin: Aysel YATANSEVER
Büro Elemanı
Telefon No : 224 2757800 Faks: 224 2670945 Tel - Faks: 1923 -
İnternet Adresi : www.kgm.gov.tr KEP: kgmkurs3@hs01.kep.tr e-posta : Adanal@kgm.gov.tr
İlgili Birim : Taşınmazlar Başmühendisliği -

1/2

2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıya Çıkarılma Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Marmaraereğlisi İlçesi, Yakuplu Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazların değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuni uygun olarak tamamlanacaktır.

Bu karara göre Tekirdağ İli, Marmaraereğlisi İlçesi, Yakuplu Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 06.04.2026 tarihinden itibaren askıya çıkarılmıştır. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

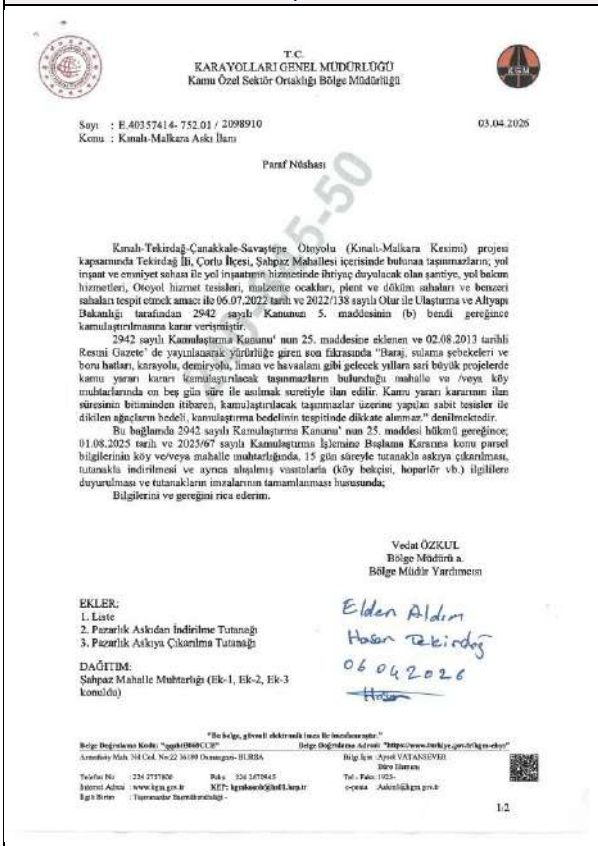
İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilanı çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

6/4/2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi	Muhtar	Aza
Habip GÜNEŞ	YAKUPLU MAHALLESİ MUHTARI Oğuz ALKAN	Yunus İNCE TUNÇA

Şahpaz, Çorlu

Cut-off disclosure date: 6 April 2026



T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 / 2098910 03.04.2026
Konu : Kınalı-Malkara Askı İlanı

Paraf Nüshası

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Çorlu İlçesi, Şahpaz Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 01.08.2025 tarih ve 2025/67 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması hususunda;

Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

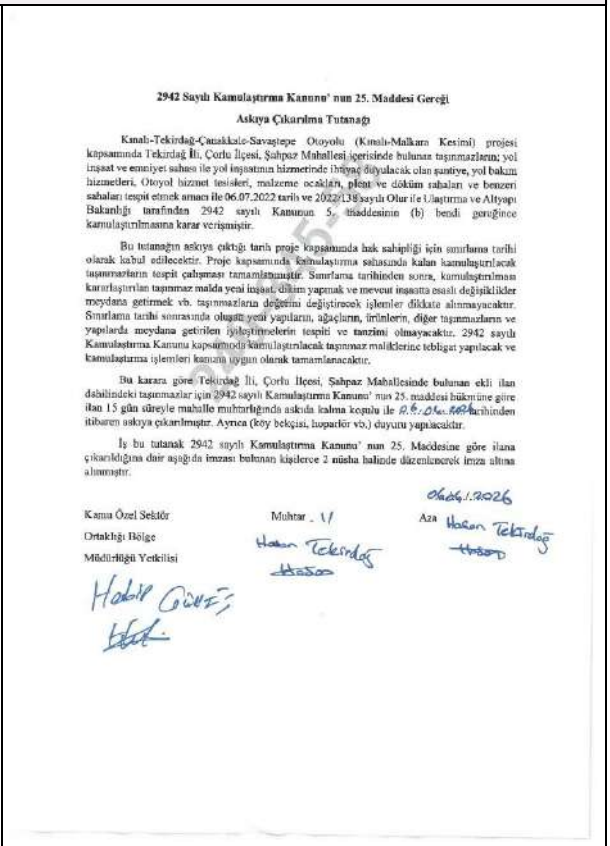
EKLER:
1. Liste
2. Pazarlık Askıdan İndirilme Tutanağı
3. Pazarlık Askıya Çıkarılma Tutanağı

DAĞITIM:
Şahpaz Mahalle Muhtarlığı (Ek-1, Ek-2, Ek-3 konuldu)

Elden Aldım
Hasan Tekirdağ
06.04.2026

"Bu belge, güvenli elektronik imza ile imzalanmıştır."
Belge Doğrulama Kodu: "qqnh1B68CC0" Belge Doğrulama Adresi: "https://www.turkiye.gov.tr/kgm-ekys"
Armutlu Mah. 360 Cad. No:22 16180 Osmangazi- BURSA Bilgi İçin : Ayşel VATANSEVER
İdare Hizmeti
Telefon No : 224 2757800 Faks : 224 2470845 Tel - Faks: 1923-
İnternet Adresi : www.kgm.gov.tr KEP: kgmkurumsal@hs01.kep.tr e-posta : Aselvatan@kgm.gov.tr
İlgili Birim : Tapulama Daire Başkanlığı -

1/2



2942 Sayılı Kamulaştırma Kanunu' nun 25. Maddesi Gereği

Askıya Çıkarılma Tutanağı

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Çorlu İlçesi, Şahpaz Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

Bu tutanağın askıya çıktığı tarih proje kapsamında hak sahipliği için sınırlama tarihi olarak kabul edilecektir. Proje kapsamında kamulaştırma sahasında kalan kamulaştırılacak taşınmazların tespit çalışması tamamlanmıştır. Sınırlama tarihinden sonra, kamulaştırılması kararlaştırılan taşınmaz malda yeni inşaat, dikim yapmak ve mevcut inşaatta esaslı değişiklikler meydana getirmek vb. taşınmazlarla değerini değiştirecek işlemler dikkate alınmayacaktır. Sınırlama tarihi sonrasında oluşan yeni yapıların, ağaçların, ürünlerin, diğer taşınmazların ve yapılarda meydana getirilen iyileştirmelerin tespiti ve tanzimi olmayacaktır. 2942 sayılı Kamulaştırma Kanunu kapsamında kamulaştırılacak taşınmaz maliklerine tebligat yapılacak ve kamulaştırma işlemleri kanuna uygun olarak tamamlanacaktır.

Bu karara göre Tekirdağ İli, Çorlu İlçesi, Şahpaz Mahallesinde bulunan ekli ilan dahilindeki taşınmazlar için 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmüne göre ilan 15 gün süreyle mahalle muhtarlığında askıda kalma koşulu ile 06.04.2026 tarihinden itibaren askıya çıkarılmıştır. Ayrıca (köy bekçisi, hoparlör vb.) duyuru yapılacaktır.

İş bu tutanak 2942 sayılı Kamulaştırma Kanunu' nun 25. Maddesine göre ilana çıkarıldığına dair aşağıda imzası bulunan kişilerce 2 nüsha halinde düzenlenerek imza altına alınmıştır.

06.04.2026

Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü Yetkilisi

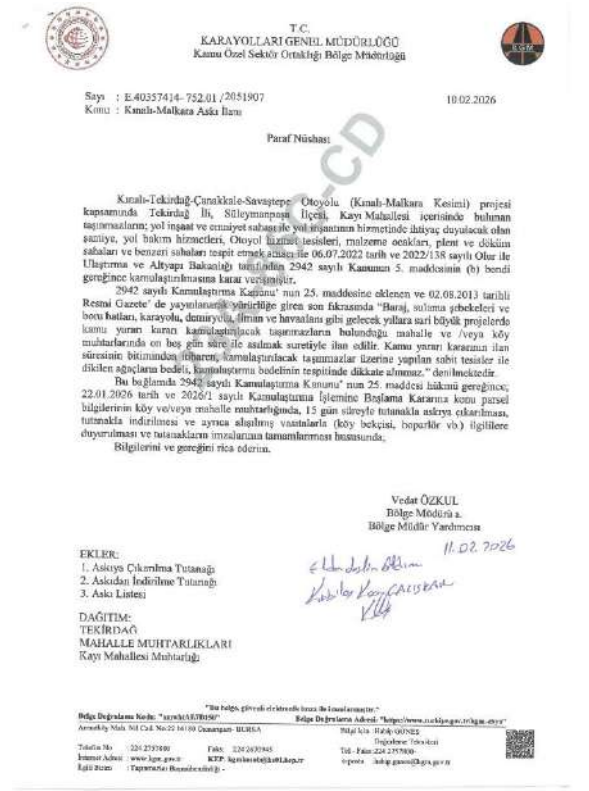
Muhtar : Hasan Tekirdağ

Aza Hasan Tekirdağ

Habip GÜNEŞ

Kayı, Süleymanpaşa

Cut-off disclosure date: 11 February 2026



T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 /2051907 10.02.2026
Konu : Kınalı-Malkara Askı İlanı

Paraf Nüshası

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Süleymanpaşa İlçesi, Kayı Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren, kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 22.01.2026 tarih ve 2026/1 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması hususunda;

Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

11.02.2026

EKLER:
1. Askıya Çıkarılma Tutanağı
2. Askıdan İndirilme Tutanağı
3. Askı Listesi

DAĞITIM:
TEKİRDAĞ
MAHALLE MUHTARLIKLARI
Kayı Mahallesi Muhtarlığı

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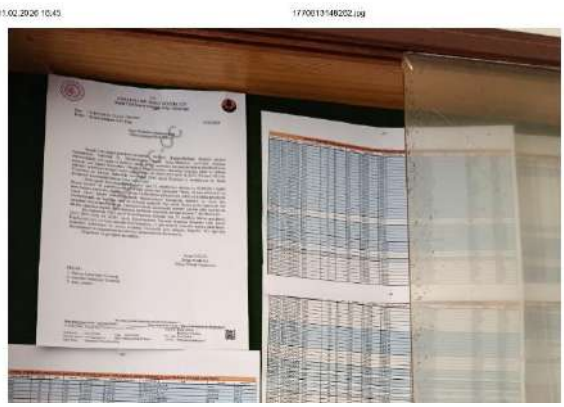
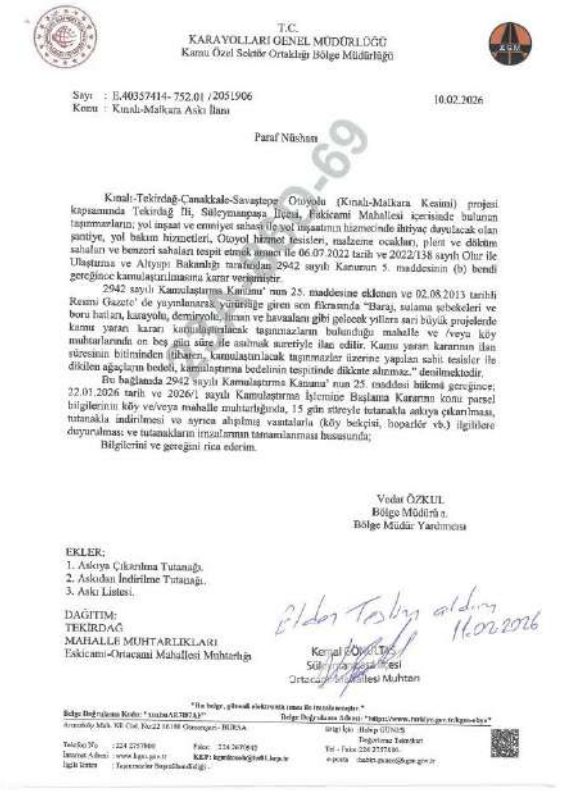
Armutlu Mah. 360 Cad. No:22 16180 Osmangazi- BURSA Bilgi İçin : Hakan GÜNEŞ
Değerleme Tekniker
Telefon No : 224 2757800 Faks : 224 2470845 Tel - Faks: 224 2757800-
İnternet Adresi : www.kgm.gov.tr KEP: kgmkurumsal@hs01.kep.tr e-posta : hakan.gunes@kgm.gov.tr
İlgili Birim : Tapulama Daire Başkanlığı -



11.02.2026 10:45 1770013146202.jpg

Eskicami, Süleymanpaşa

Cut-off disclosure date: 11 February 2026



T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 /2051906
Konu : Kınalı-Malkara Askı İlanı

10.02.2026

Paraf Nüshası

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Süleymanpaşa İlçesi, Eskicami Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren; kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 22.01.2026 tarih ve 2026/1 sayılı Kamulaştırma İşlemine Başlama Kararının konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması hususunda;

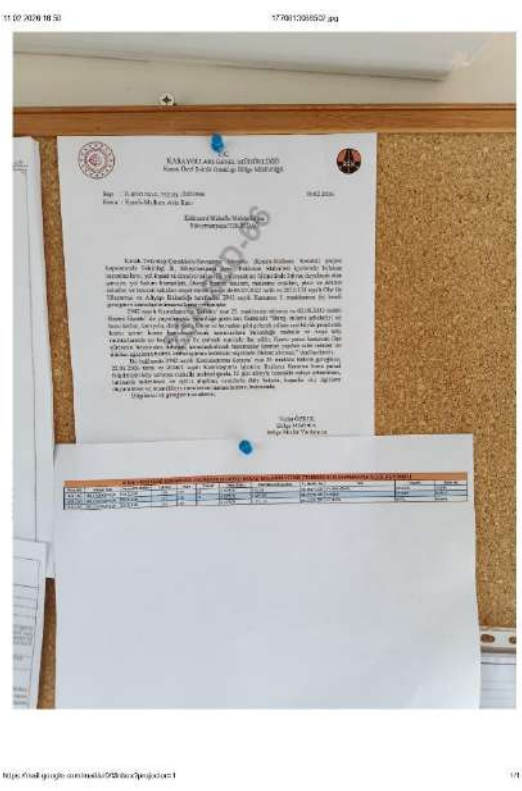
Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

EKLER:
1. Askıya Çıkarılma Tutanağı.
2. Askıdan İndirilme Tutanağı.
3. Askı Listesi.

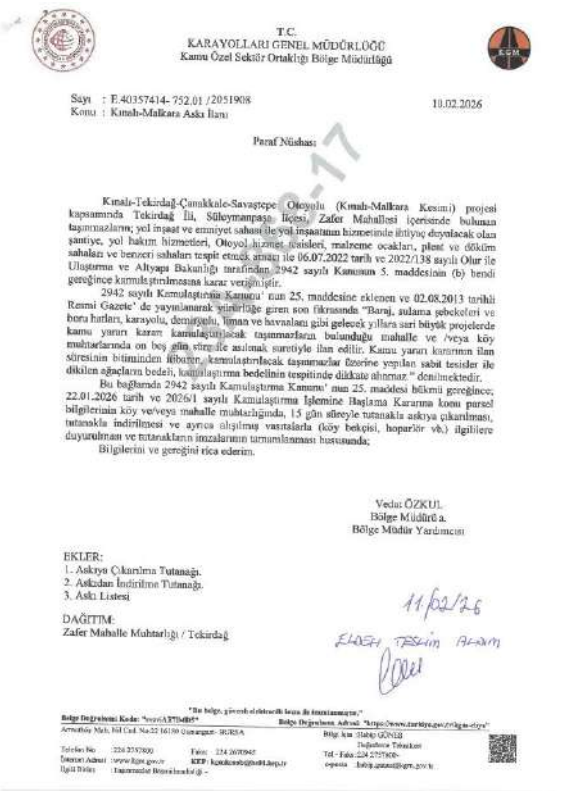
DAĞITIM:
TEKİRDAĞ
MAHALLE MUHTARLIKLARI
Eskicami-Ortacami Mahallesi Muhtarlığı

Elden Teslim aldım 11.02.2026
Kemal ÖZKUL
Süleymanpaşa Eskicami
Ortacami Mahallesi Muhtarı



Zafer, Süleymanpaşa

Cut-off dilscosure date: 11 February 2026



T.C.
KARAYOLLARI GENEL MÜDÜRLÜĞÜ
Kamu Özel Sektör Ortaklığı Bölge Müdürlüğü

Sayı : E.40357414- 752.01 /2051908
Konu : Kınalı-Malkara Askı İlanı

10.02.2026

Paraf Nüshası

Kınalı-Tekirdağ-Çanakkale-Savaştepe Otoyolu (Kınalı-Malkara Kesimi) projesi kapsamında Tekirdağ İli, Süleymanpaşa İlçesi, Zafer Mahallesi içerisinde bulunan taşınmazların; yol inşaat ve emniyet sahası ile yol inşaatının hizmetinde ihtiyaç duyulacak olan şantiye, yol bakım hizmetleri, Otoyol hizmet tesisleri, malzeme ocakları, plent ve döküm sahaları ve benzeri sahaları tespit etmek amacı ile 06.07.2022 tarih ve 2022/138 sayılı Olur ile Ulaştırma ve Altyapı Bakanlığı tarafından 2942 sayılı Kanunun 5. maddesinin (b) bendi gereğince kamulaştırılmasına karar verilmiştir.

2942 sayılı Kamulaştırma Kanunu' nun 25. maddesine eklenen ve 02.08.2013 tarihli Resmi Gazete' de yayınlanarak yürürlüğe giren son fıkrasında "Baraj, sulama şebekeleri ve boru hatları, karayolu, demiryolu, liman ve havaalanı gibi gelecek yıllara sarî büyük projelerde kamu yararı kararı kamulaştırılacak taşınmazların bulunduğu mahalle ve /veya köy muhtarlarında on beş gün süre ile asılmak suretiyle ilan edilir. Kamu yararı kararının ilan süresinin bitiminden itibaren; kamulaştırılacak taşınmazlar üzerine yapılan sabit tesisler ile dikilen ağaçların bedeli, kamulaştırma bedelinin tespitinde dikkate alınmaz." denilmektedir.

Bu bağlamda 2942 sayılı Kamulaştırma Kanunu' nun 25. maddesi hükmü gereğince; 22.01.2026 tarih ve 2026/1 sayılı Kamulaştırma İşlemine Başlama Kararına konu parsel bilgilerinin köy ve/veya mahalle muhtarlığında, 15 gün süreyle tutanakla askıya çıkarılması, tutanakla indirilmesi ve ayrıca alışılmış vasıtalarla (köy bekçisi, hoparlör vb.) ilgililere duyurulması ve tutanakların imzalarının tamamlanması hususunda;

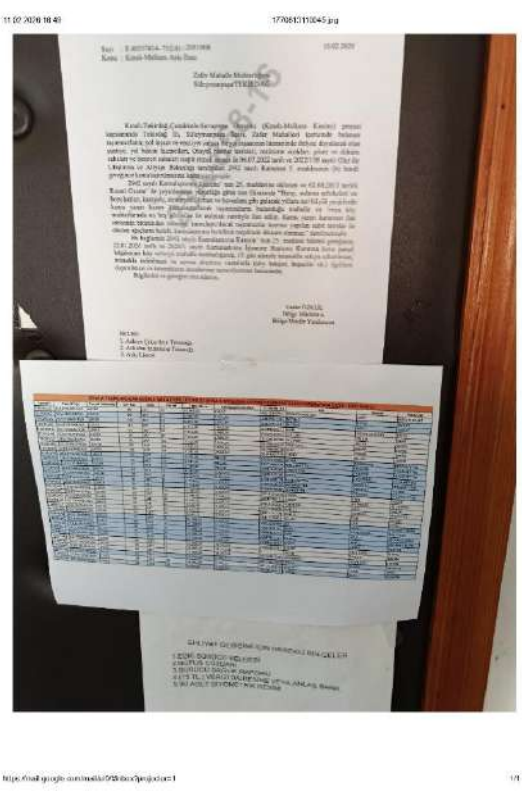
Bilgilerini ve gereğini rica ederim.

Vedat ÖZKUL
Bölge Müdürü a.
Bölge Müdür Yardımcısı

EKLER:
1. Askıya Çıkarılma Tutanağı.
2. Askıdan İndirilme Tutanağı.
3. Askı Listesi.

DAĞITIM:
Zafer Mahalle Muhtarlığı / Tekirdağ

11/02/26
ELDEN TESLİM ALDIM



Appendix E – Land Access Permit (Template)

[to be completed internally by the SPV and EPC]

1.Genel Bilgiler *General Information*		
İş İzin No: *Work Permit No:*	**Çalışma Yerinde/KM Aralığında Yer Alan Parseller:**	
Firma Adı: *Contractor/Subcontractor Name:*	**Yerleşim** *Settlement*	**Lot/Parsel No.** *Lot/Parcel No:*
İzin Talep Tarihi: *Permit Request Date:*	1	
Lokasyon: *Location:*	2	
	3	
	4	
(Çalışma Yeri ve/veya KM Aralığı ve/veya GPS Koordinatları)	5	
	6	
	7	
	8	
Parcels Located Within the Project Site / KM Section:	9	
	10	

2. Çalışmanın Tarifi
Description of the Work

3.Araziye Girişe Hazırlık Kontrol Listesi
Land Access Readiness Checks

***Çalışma kontrolü, işe başlamadan önce Arazi Giriş İzni'ni talep eden sorumlu tarafından doldurulacaktır.**	**Evet (E)**	**Hayır (H)**
1 **Kamulaştırma/tahsis süreci** tamamlandi mi? *Has **expropriation/allocation process** been completed **(yes / no)**?* a) **Özel mülkiyete tabi taşınmazlar için** – Madde 8 kapsamında **tapu devri** veya Madde 27 kapsamında **el koyma kararı** süreçleri tamamlandı mı? ***For private lands** – are **title deed transfer** under Article 8 or **land seizure decision** issued under Article 27 completed?* b) **Kamuya veya tüzel kişilere ait taşınmazlar için** – orman izni, kamu kurumları tarafından yapılan tahsisler veya tüzel kişiler tarafından verilen muvafakatlar tamamlandı mı? ***For public and legal entity lands** – are forestry permit, land allocations by public institutions or consent by legal entities completed?*		
Özel mülkiyete sahiptaşınmazlarda kamulaştırma tamamlanmamışsa, tüm hissedarlarla gerekli muvafakat protokolleri imzalandı mı? 2 *If expropriation for **private lands** has **not** been completed, have the required **consent protocols** been signed with all shareholders?*		
Girilecek arazide, arazi girişi öncesi **arazi kullanıcısı (resmi ya da gayri resmi)** olup olmadığı tespit edildi mi? 3 *Has it been determined whether there are any **land users (formal or informal)** on the land prior to land entry?*		
Kamulaştırmanın tamamlanmasını takiben **Araziye Giriş Protokolü** imzalandı mı? 4 *Has the **Land Entry Protocol** been signed following completion of expropriation?*		
RAP kapsamında araziye girişten önce yapılması gereken **tüm ödemeler** tamamlandı mı? **Tamamlanmamış ise,** kalan ödemelerin araziye giriş sonrasında tamamlanmasına ilişkin mutabakata AGP'de yer verilmiş midir? 5 *Have **all payments** required prior to land entry under the **RAP** been completed?**If not completed,** have the agreed provisions regarding the completion of the remaining payments after land entry been included in the Land Entry Protocol?*		

4. Çalışma Lokasyonu için Mevcut Olan Arazi Edinimi, Kamulaştırma ve RAP Belgeleri
Existing Land Acquisition, Expropriation, and RAP Documents for the Work Location

☐**KGM adına tapu devrinin yapıldığını gösterir belgeler (Madde 8)**
Title deeds transferred to KGM (Article 8)

☐**Araziye giriş öncesinde SPV tarafından sağlanması gereken RAP kapsamındaki tazminat ödemelerine ilişkin belgeler**
Evidence of RAP compensation required to be provided by the SPV prior to land entry

☐**KGM tarafından yapılan kamulaştırma bedeli ödemelerine ilişkin belgeler (Madde 8)**
Evidence of compensation payments by KGM (Article 8)

☐**Muvafakat**
Consent protocols

☐**El koyma kararı (Madde 27)**
Land Seizure Decision (Article 27)

☐**İmzalı araziye giriş protokolleri**
Signed land entry protocols

☐**El koyma bedelinin KGM tarafindan yatırıldığına dair belgeler (Madde 27)**
Evidence of land seizure value deposition by KGM (Article 27)

☐**Diğerleri**
Others

☐**Kamuya ait parseller için izin / tahsis belgeleri (orman izni, hazine arazisi tahsis belgeleri, mera vasfı değişikliği belgeleri, tüzel kişiliğe ait parseller için muvafakat yazıları)**
Permitting documentation for pubilc parcels (forestry permit, treasury land allocation documents, change of allocation for pasture, consent letters for legal entity parcels)

5. Notlar (varsa)
Notes (if applicable)

6. Arazi Giriş İzni – Onay
Land Access Permit – Approval

Çalışma alanında yer alan tüm parsellere ait arazi edinimi/kamulaştırma ve RAP süreçlerine ilişkin belgeler ve izinler tarafımızca kontrol edilip onaylanmıştır.

All documents and permits related to land acquisition/expropriation and RAP processes for all parcels within the project area have been reviewed and approved by us.

	SPV – Ç&S Müdürü *SPV- E&S Manager*	**EPC – Kamulaştırma Müdürü** *EPC – Expropriation Manager*
Adı-soyadı *Name-surname*		
İmza *Signature*		
Tarih *Date*		

Appendix F - Land Entry and Exit Protocols (Template)

[to be completed by the SPV]

KINALI – MALKARA MOTORWAY PROJECT

LAND ENTRY PROTOCOL

Information on Land	
Province:	
District:	
Neighbourhood:	
Parcel No:	
Location/Motorway KM:	
Brief description of the activities to be conducted on the parcel:	
List of structures/trees/crops on the parcel prior to land entry by the Project (if any – please indicate "vacant" if the land is vacant)	
Planned date for land entry by the Project	

In relation to the parcel identified above, this Protocol confirms that all payments required under the Expropriation Law for land and any identified structures, trees, and crops (if any) have been made to the rightful owners, and that they have been informed by the Project about both the activities to be carried out under the Project and the additional support to be provided within the scope of the Project's Resettlement Action Plan (RAP). These support measures shall be provided to the eligible beneficiaries defined under the RAP following the approval of the RAP document by the relevant financing institutions and in accordance with the mutually agreed timeframes.

	Name Surname	Date	Signature
SPV Representative:			
EPC Representative:			

Annexes:

Annex 1: Documents related to the payments made to the rightful owner under the Expropriation Law and, where applicable, the RAP (e.g., crop compensation payments, etc.)

Annex 2: Photographs and documentation showing the pre-access condition of the parcel to be entered (including ground, and any structures, trees, or crops, if present)

KINALI – MALKARA MOTORWAY PROJECT

LAND EXIT PROTOCOL

Information on Land	
Province:	
District:	
Neighbourhood:	
Parcel No:	
Location/Motorway KM:	
Brief description of the activities conducted on the parcel:	
Date for land exit by the Project	

This protocol confirms that all activities carried out on the parcel specified above within the scope of the **Kınalı – Malkara Motorway Project** have been completed and that the land has been restored to its original condition as agreed with the landowner and/or user.

The landowner and/or user signing this document acknowledges that the parcel has been duly reinstated and declares that they shall not make any further claims or compensation demands against the Project Owner, the Assigned Company, the contractor, the subcontractors, or any third party regarding the use of the land during the construction works.

This protocol does not create any rights or obligations for the Project Owner, the Assigned Company, the contractor, the subcontractors, or any third parties beyond those established under separate contractual agreements.

	Name Surname	Date	Signature
Landowner/Shareholder:			
Land User:			
Witness – Settlement Head (Mukhtar):			
SPV Representative:			
EPC Representative:			

Annexes:

- **Annex-1:** List of reinstated areas and/or structures
- **Annex-2:** Photographs and related documentation of the site, including the reinstated areas and structures

Appendix G - Relevant Legislation and Procedures

G.1 – Relevant Articles of the Expropriation Law of Türkiye (No. 2942, 1983)

Article	Definition
Article 3 - Requirements for Expropriation	For the implementation of large projects that concern issues such as energy, irrigation and afforestation etc., administrations may expropriate by paying the fee for the immovables, resources and their easement rights in cash or as down payment in equal instalments, as required for the conduct of public services or interventions they are obliged to provide according to laws.
Article 4 – Constitution of Servitude (Easement Rights)	Instead of expropriating the ownership of the immovables, easement right can be established by expropriation on a certain section, height, depth or source of the immovable if it is sufficient for the purpose. However, provided that the use of the property right of the owners is not hindered and necessary measures are taken in terms of safety of life and property, transportation lines such as cable cars and all kinds of bridges can be built on the immovable, subway and similar rail transport systems and tunnels can be built under the immovables based on the public benefit. In case the use of the right of ownership of the immovables is not prevented, no expropriation of the immovables shall be made. No value increase fee can be collected from the owners of the real estate due to the investment made.
Article 5 –Authorities that Decide on Public Benefit	This article specifies the competent authorities that can take the public benefit decision. In case of the Project, public benefit decision was declared by MoTI in July 2022.
Article 7 –Procedures to be Completed Prior to Expropriation and Administrative Annotation	The administration responsible from the execution of the expropriation process prepares or commissions a scaled plan indicating the borders, surface area and type of the immovable assets of resources on which expropriation is to be conducted or servitude (easement rights) to be constituted by way of expropriation, enables that the owners of the expropriated immovable asset, the ownerships if no title deed registrations are present and their addresses by binding them to documents through an inquiry it would conduct on the land registry, tax and civil registry records as well as additional inquiries. After the administration takes the decision on expropriation, the related annotation of the expropriation in the title deed is notified to the title deed administration where the mentioned immovable asset is registered. If the owner changes after the notification date, the title deed administration is obliged to notify the administration of any changes to occur in the ownership or in the rights in kind that are separate from the ownership. If the document to be obtained from the court indicating that a request for the identification of the expropriation fee and the registration in the name of the administration as per the Article 10 is not submitted to the title deed administration within six months starting on the annotation date, this annotation is ex officio deleted from the title deed records.
Article 8 – Purchase Method	According to the Law, the administrations shall apply the negotiated purchase method in the first place for the expropriations of the immovable properties registered in the title deed. Following the expropriation decision, the administration to expropriate shall determine the estimated value of the immovable property by assigning one or more in-house valuation commissions consisting of at least three persons in accordance with the principles of Article 11 of the Law and by obtaining reports from experts, institutions or organisations related to the subject, and making use of the information to be obtained from the Chambers of Industry and Commerce and local real estate offices, if required. Moreover, the administration shall assign one or more reconciliation commissions that consist of at least three people to carry out and finalise the negotiations over the estimated price.
Article 10 – Identification of the Expropriation Fee by Court and Registration of Immovable in the	If the expropriation cannot be realised through procurement, the administration applies to the court of first instance in the locale of the immovable and requests that the expropriation fee for the immovable asset be identified and decision be made for its registration in the name of the administration in return for the payment of this fee.

Article	Definition
Name of the Administration	Within 30 days of the application of the administration, the Court notifies the owner of the immovables through an annotated invitation on the date of hearing. To those whose addresses could not be found after inquiries an announcement is made according to Notification Law (Law No. 7201) inviting them to attend the hearing. The Court also publishes information on the expropriation at least once in a local newspaper (if there is any) issued in the location of the immovable and in one of the newspapers circulated across Türkiye. On the day of the hearing, the judge invites the parties to reach an agreement on the value of the immovable. If an agreement is reached, the judge considers this fee to be the expropriation fee. In cases where an agreement is not reached, the judge schedules an expedition (within ten days) to identify the value of the immovable asset and a date for the second hearing (within thirty days after the expedition). On the second hearing, if the parties fail to agree on the value once again, the judge will assign a new expert committee for the valuation within fifteen days and then identifies a fair and equitable expropriation fee by referencing both the reports and statements of the parties and experts. The identified fee is the expropriation fee of the immovable, resource or its easement rights. The Court grants fifteen days to the administration for the fee to be deposited in a bank on behalf of the owner. In cases where the right holder could not be identified, the court decides on the registration of the immovable in the name of the administration under the circumstances that the bank receipt indicating the amount was blocked to be given to the right holder to be revealed in the future and that this decision is notified to the title deed department and the bank where the fee was deposited. The provision on registration is definitive and the parties reserve their rights for appeal pertaining to the fee.
Article 11 – Principles for the Determination of the Expropriation Fee	The panel of experts to be established in accordance with Article 15 shall visit the location of the immovable property or resource to be expropriated, together with the court committee, and after listening to the relevant persons present, they shall prepare a report based on; a) Sort and type b) Surface area c) All features and components that may add to its value and the value of each element separately d) Tax declaration, if any e) Valuations by the authorities on the expropriation date f) The net income the immovable property or resource on the agricultural lands shall bring if it is used as is and according to their locations and conditions g) For residential plots, the sales value according to the precedent sales without a special purpose before the expropriation day, h) For buildings, official unit prices and building cost calculations and depreciation i) Other objective criteria that shall be effective in determining the price, provided that the effect of each measure is explained which includes the answers to all these factors separately and the panel determines the value of the immovable property based on a reasoned evaluation report in accordance with the valuation standards accepted by the Capital Markets Board of Türkiyeand by taking into account the statements of the relevant parties. As part of the constitution of servitude (easement rights), any decrease in the value of the immovable or the resource due to expropriation will be justified in the valuation. This decrease in value is the expropriation cost.
Article 12 – Partial Expropriation	Value of partially expropriated immovable property refers to; a) The amount of the expropriated part from the value appraised according to the principles specified in Article 11, unless the value of the unacquired part changes due to expropriation. b) The amount found by determining the amount of decreased value and adding the decreased value to the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is a decrease in the value of the unacquiredpart due to expropriation. c) The amount found by determining the amount of increased value and subtracting the increased value from the expropriation value determined in accordance with the principles specified in subparagraph (a) of the expropriated part, if there is an increase in the value of the

Article	Definition
	unacquired part due to expropriation. Shall the remaining part of a partially expropriated immovable is not suitable for utilization, this part shall also be expropriated upon written application made by the legal owner within thirty days of the notification of the expropriation decision in cases where no lawsuits were filed in the administrative court against the expropriation procedure. If an immovable asset subject to joint ownership that was partly expropriated was divided among stakeholders and left to the possession and utilization of one or more stakeholders, and if the partial expropriation performed involves the whole or a part of this land, any procedures related to the expropriation will then be conducted only in relation to this stakeholder(s) and the expropriation fee is paid to them in proportion with their stakes. The stakeholder(s) has/have the right to file a lawsuit only for this part. They have no remaining rights on the part of the immovable that was not expropriated, and their names are removed from the list of stakeholders. The expropriated areas are registered in the land registry in the name of the administration. Any conflicts arising out of the enforcement of this article are resolved by the judicial courts.
Article 14 – Right to a Lawsuit	A lawsuit for cancellation of land acquisition decision in the administrative court or for correction of the material errors may be filed against the expropriation procedure within thirty days as of the date of notification issued by the court as per the Article 10 -the date of notification is replaced by the date of announcement in the newspaper by the court for those who could not be notified- by the owner of the immovable asset subjected to expropriation.
Article 18 – Dispute on the Ownership	The administration identifies whether there are any disputes on the immovable to be expropriated by performing an inquiry at the title deed administration, land survey directorate and civil courts in the location of the immovable. Shall the inquiries indicate that there is a dispute on its ownership or that it was subject to a lawsuit, the entirety of documents prepared as per the Article 10 are submitted to the civil court of first instance of the location of the immovable and is requested that the expropriation fee of the immovable is determined as well as its registration is made in the name of the administration in return for the payment to be made to the right holder as soon as they have been determined. The initial and consequent instalments of the expropriation fee identified by the court are deposited in the time deposit accounts with quarterly terms each at the bank designated by the court. Upon application by the person adjudged by the court to be the rightful owner as a result of the ownership dispute, the court that determined the expropriation value shall instruct the bank to pay the money to this rightful owner, and the payment shall be made accordingly. If any person fails to comply with the court's summons, the procedures set forth in this article shall be carried out in their absence. If the immovable property that has been expropriated transforms into a nature that does not require registration in the land registry in terms of the public service to which it has been allocated, the court shall order deletion of the registry entry upon request. During these registration and deletion processes, tax liabilities related to this immovable property shall not be sought from the owners. However, the land registry office shall notify the relevant tax office of the situation. The value determined by the court constitutes the expropriation value of the immovable property, resource, or easement right.
Article 19 – Registration of Immovable Assets not Registered in the Land Registry and Possessor ("*Zilyet*") Rights	The administration initially identifies whether the immovable not registered in the land registry is one of the public assets listed in Article 16 of the Cadastral Law (Law No. 3402). If the immovable is not one of the public assets listed in this article, and that the ownership for the immovable is present and a claim for acquisition is made on the basis of ownership, the administration conducts an investigation at the location of the immovable by means of the experts selected as per the Article 9, collects the evidence and specifies the state of affairs in a record. The entirety of the documents prepared by the administration and collected according to the Article 10 of the Expropriation Law is submitted to the civil court of first instance at the location

Article	Definition
	of the immovable. The court identifies the expropriation fee for the immovable asset as per the procedure and duration specified in Article 10. If the court deems it sufficient to declare the immovable asset to be within the scope of the Turkish Civil Law on the expropriation date and to have been acquired through ownership, it conveys the expert report on the identification of the expropriation fee to the administration and this report along with the other documents given by the administration to the owner. The status of the immovable is communicated to the highest public official in charge of assets in that area while it is also announced at least once in a local newspaper issued in the location of the immovable and a newspaper circulated across Türkiye. If no objections are raised by the Treasury or any third parties within thirty days as of the last announcement, a period of fifteen days is granted to the administration for the expropriation fee to be deposited in the bank stated in the announcement as down payment and in cash or as the first instalment in the name of the owner. Upon the submission of the payment receipt, the Court decides on the registration of the immovable asset in the name of the administration and the payment of the expropriation fee to the owner. Whereas, this decision is communicated to the land registry office and the bank where the money is deposited. If an objection is raised within this period by the Treasury or third parties, the court decides on the registration of the immovable asset in the name of the administration after the identified expropriation fee is deposited in a deposit account opened in the bank to be paid in the future to the person who would prove their rightful ownership.
Article 20 – Evacuation of the Immovable Asset	As per this Law, evacuation of the immovable asset, registered by the land registry office under the name of the authority to whom's benefit expropriation is conducted, is demanded from enforcement officer. The enforcement officer notifies the residents of the corresponding immovable asset about its evacuation within the following 15 days. If the immovable asset is not evacuated within the notified time, judicial evacuation takes place. Objection of grievance do not halt the evacuation and the court shall not issue an interim injunction. Neither the owner nor the administration shall be held responsible due to the evacuation of the immovable asset. Evacuation of cultivated lands shall be done at the end of the harvesting period. In cases when it is not possible to delay evacuation until the harvesting period, the owner of the crops shall be compensated prior to land entry. The authority responsible from the expropriation is permitted to request the evacuation of the parcel on condition that the price of the crops to be determined by the court shall be compensated. If the price of the crops has already been taken into consideration in the valuation done as per the Article 11 and 12 of the Law, there is not requirement for revaluation and repayment of the crop price.
Article 25 – Limitation of Rights and Transfer of Ownership to the Administration	The expropriation procedure is initiated through the notification conveyed by the Court as per the Article 10, with regard to exercising of rights and fulfilment of obligations. The transfer of ownership to the administration is realised based on the decision for registration taken by the Court. The owner of the immovable loses his/her rights to engage in activities such as construction or cultivation or to make fundamental changes in the current structure of the immovable after the date of the registration decision taken by the Court. The value of activities performed after this date is not taken into account. (Additional Clause: 12 July 2013- 6495/27th article) For large projects such as dams, irrigation networks and pipelines, highways, railways, harbours and airports, the decision for the public benefit is announced in the mukhtar's office of the neighbourhood and/or village where the immovable to be expropriated are located. After the last day of the announcement of the public

Article	Definition
	benefit decision, the cost of the fixed installations on the immovable and the trees planted are not taken into account in the identification of the expropriation fee. This limitation on the immovable assets is valid for 5 years after the last day of the announcement.
Article 27 – Accelerated Expropriation	The immovable property subject to expropriation may be seized through accelerated expropriation under three circumstances; (i) in situations for which President takes decision regarding the need for national defense in the scope of the implementation of the Law on National Defense Obligations (Law No: 3634); (ii) in situations of emergency determined by the Presidential decision, or (iii) in extraordinary situations as envisaged by special laws. In such cases/situations, upon the request of the relevant administration, a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the procedures other than valuation shall be completed afterwards. In this process, upon request of the related administration, compensation amount for the immovable property shall be appraised by the court within 7 days through the experts assigned as per Article 10 and 15 of the Expropriation Law. Seizure shall only be made following the invitation to be done in accordance with Article 10 and the amount is deposited to the bank specified in the announcement. The related Directorate of Land Registry is notified about the seizure decision to be made by the Court. The provision related to the prohibition of the transfer or alienation of the immovable asset is annotated to the land register. The asset is evacuated as per Article 20 following the issuance seizure decision. Article 27 of the Law enables land entry earlier through an accelerated process when compared to the regular expropriation processes conducted under Article 10 of the Law. This said, Article 27 does not limit the rights and claims of the owners on valuation of land and fixed assets. The valuation process is done by the court or court nominated experts as per the Expropriation Law. In this process, land valuation performed by experts appointed by the court is only a determination and is not decisive. After this price is determined and deposited by the Administration into the account number as determined by the court, actions stipulated in Articles 8, 9 and 10 shall apply. It is necessary to receive a "public benefit" decision from the relevant institutions for accelerated expropriation. After this decision is received, approved and published in the Official Gazette, accelerated expropriation process starts. Differently from ordinary expropriation, accelerated expropriation is the method of seizing an immovable property in line with prescribed procedure and method on the condition that actions other than valuation are completed later on. Accelerated expropriation will be handled in the form of a lawsuit. Public institutions will apply to the court in order to get valuation done and receive an expropriation decision. The court only acts as a determination authority in this case. If the court determines the existence of public benefit and the value of the immovable property as determined by the Valuation Commission is blocked in the bank account of the owner thereof, the lawsuit is admitted. Admission of the lawsuit will not result in the replacement of the owner in the title deed. The admission of this lawsuit can only enable the administration to perform the action considered to have public benefit. However, actions will not be complete. Actions will be performed just as in normal expropriation process. The Administration will primarily try to purchase the property from its owner through negotiated settlement. If agreement is reached as a result of this procedure, the relevant price will be paid and expropriation procedure will be complete. However, if no agreement is reached, the administration will also file a lawsuit on "the Determination and Registration of Expropriation Price"
Article 29 – Payment of the Expenses	The per diem allowances of the court panel as per Article 10 and appraised costs by the Court for the experts arranged by the Court as per Article 15 and the fees of the settlement heads consulted during reconnaissance, and title deed fees, and other expenses as stipulated by this Law are paid by the administration responsible from the execution the expropriation.
Article 30 – Transfer of	This article articulates that immovable, resources and easement rights owned by public legal

Article	Definition
an Immovable Owned by an Administration to Another Administration	persons and agencies may not be expropriated by another public legal person or agency. The administration that requires the immovable, resource or easement rights identifies the fee according to the Article 8 of Expropriation Law. It lodges a written application at the administration owning the asset by stating the amount it would pay on the basis of this fee. If the owner of the asset fails to abide by the transfer and respond within sixty days, the conflict is settled via an affirmed decision within two months after being inspected by the relevant administrative office of the Council of State upon application by the receiving administration. If the parties fail to reach an agreement on the price, the receiving administration lodges an application at the court according to the procedure written in the Article 10 within thirty days as of the notification date of the Council of State decision asking for the expropriation fee to be identified. In the adjuration process to be conducted in this case, the court does not enforce the provisions of the Law dated 9/6/1938 and number 3533. A period of fifteen days is granted to the receiving administration for the fee identified as the expropriation fee as per the procedure envisaged in the Article 10 to be deposited in the bank specified by the administration in order to be given to the asset-owning administration and the receipt of the fee deposited to be submitted. This period may be extended as necessary for only once by the court. The court decides on the registration of the immovable asset in the name of the administration and the expropriation fee to be paid to the asset-owning administration upon the submission of the receipt indicating that the expropriation fee was deposited by the receiving administration in the bank in the name of the asset-owning administration and this decision is notified to the title deed department and the bank where the money was deposited. The provision on registration is definitive and the parties reserve their rights for appeal in relation to the fee. The immovable, resource and the easement rights thus taken over is deemed to have been received via expropriation and it cannot be used for transfer purposes or for any public purposes other than those allowed by the transferring administration. Otherwise, the transferring administration may receive the immovable back as per the Article 23. This matter is annotated in the field of declarations in the title deed log.

G.2 – Other Laws relevant to Land Use, Acquisition, and/or Registration

Law	Scope
Forest Law **(No. 6831, 1956)**	In accordance with the Forest Law, the Project must obtain permission from the Ministry of Forestry and Water Affairs to perform activities in forests or lands classified as forest and is required to indemnify damages to public forests resulting from the construction of the railway. The use of state-owned lands (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Agriculture and Forestry (former Ministry of Food, Agriculture and Livestock – MoFAL). Citizens can also rent treasury lands for agricultural, commercial, sports and social activities. The use of forestry land is regulated by the Forest Law No.6831 and the Pasture Law No. 4342. Registration of the ownership or easement rights will be carried out in accordance with the Cadastral Law No. 3402, and Land Registry Code (Official Gazette No. 28738). According to Law (17.06.2004 article 5192/1), the Ministry has the authority to give permission for the use of forestland. This permission cannot be longer than 49 years. The amendment made in the Forest Law in 2004 (Official Gazette dated 3 July 2004, number 25511) states that "in case of public benefit or exigency concerning the location or construction of defence, transportation, energy, communication, water supply, wastewater, petroleum, natural gas, infrastructure facilities and solid waste disposal sites; sanatoriums, dams, ponds and cemeteries; governmental health, education and sports facilities and related places in governmental forest areas, real and legal persons can be licensed by the Ministry of Forestry and Water Affairs in return for a determined value. In addition to the Law itself, the regulation on "Permits to be Given on Land Considered Forest Areas" (Official Gazette dated 22.03.2007 numbered 26470) settles the methods and principles of the approvals, permits and easement rights to be given according to the 16, 17, 18 and 115th articles of the Forest Law as well as defining their costs for works and transactions that will be realized. Section 10 of this regulation defines the terms on which other state authorities are provided with permission to establish roads, buildings and other facilities. Article 42 depicts that in cases of public benefit, permission to utilize forest lands can be given to other state authorities for the establishment of facilities used in fields such as petroleum, natural gas, solid waste, infrastructure etc. Another regulation recently published in the Official Gazette numbered 28976 and dated 18 April 2014 stipulates the implementation of Article 17/3 and 18 of the Forest Law. Article 9 of this regulation redefines the fees and the calculation of the fees to be collected from other authorities utilizing forest land.
Pasture Law **(No. 4342)**	According to this Law based on the views of the Pastureland Commission (comprising of the manager of the district management of Ministry of Food, Agriculture and Livestock, an agricultural engineer from the Ministry itself, a jurist, a representative of the National Property Directorate, a technician from the Title Deed Registry and Cadastre Directorate and a representative of the Chamber of Agriculture) the Governors in Project affected provinces have the authority to give permission for altering the classification of pasturelands. Neither the right of the public nor of the specific users of pastures is recognized under the local legislative framework. Compensation will be paid for pasture lands to the relevant public agencies.
Cadastral Law **(No. 3402)**	The Cadastral Law determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps in order to register land and to constitute the basis of the spatial information system as the Civil Law (Law No. 4721) stipulates. In accordance with the Project, section 4 (principles for the determination of ownership rights), 6 (financial provisions) and 9 (transitions and final provisions) of the Law will need to be referenced.

Law	Scope
Land Registry Law (No. 2644, 1934)	In Türkiye, cadastral works are conducted primarily based on the Land Registration Law. The Law regulates the procedures and principles on the title deed transactions for real estate. This law specifies the authority that governs the registration of immovable properties.
Law on Soil Conservation and Land Use (Law No. 5403, 2005)	This Law sets forth the rules and principles for determining land and soil resources and their classification, preparing land utilization plans, preventing non-purpose utilisation, and defining the tasks and obligations to ensure land and soil preservation. Soil Preservation Boards are established in each province to examine, assess and monitor the activities related to the preservation, development and productive utilization of lands. The Law specifies the requirements and procedures regarding the use of agricultural lands for non-agricultural purposes.
Agricultural Reform Law on Land Arrangement in Irrigated Areas (Law No. 3083)	The Agricultural Reform Law regulates several issues for lands that are irrigated and that have been determined by the Council of Ministers. The Law covers matters regarding land consolidation and allocation of land for other purposes rather than agriculture in case of need. It is stipulated in the Law that in areas where agricultural production has no longer economic viability due to fragmentation, land consolidation works will be realized to prevent fragmentation that will result in having an effect both on the livelihood and the work force of any family. The articles referencing land consolidation issues and that will be considered by the Project are Articles 6 and 13. In addition to the Law, the regulation on "Implementation of the Agricultural Reform Law for Land Arrangement in Irrigated Areas" deals with the provisions pertaining to the implementation of the Law 3083. Articles 5 states that ownership of land belonging to real persons or public corporate entities cannot be transferred, conveyed, mortgaged and sold within 5 years after the decision of Council of Ministers has been announced in the Official Gazette. All restraints will be annotated to the land registry soon as this decision is officially announced.
The Notification Law (Law No. 7201)	The Notification Law No. 7201, with its amendments in 2003, 2008 and 2011, provides the basis for a process of notification for property owners. It consists of specific procedures to be followed to reach a range of public and private owners, including those whose addresses are unknown. According to the Law, provisions for notification include mail to known addresses; seeking support from local authorities; publication through an advertisement placed in a national newspaper published throughout the country in significant numbers; and electronic communications. The Law provides guidance for communicating with different categories of stakeholders, including resident owners, absentee owners, owners outside Türkiye, and various public agencies. The specificity and broadness of the Law support international policies' emphasis on communications and consultation. The Notification Law details the process of notification for landowners and land users whose address is unknown as determined by the Notification Officer. According to the modifications made in the Law in 2011 (Article 10), the notification can be made wherever appropriate for the affected owner and/or to the last address known. If the person cannot be reached, notification is sent to the last known residence and is directed to the village or municipal quarter headmen.
Land Registry Code (Official Gazette No. 28738, 2013)	This code aims to keep the land registry records in order with respect to the Civil Law (Law No. 4721). It comprises of the principles and procedures pertaining to ownership, limited real and individual rights of immovable assets, and their entry, amendment, cancellation and rectification to the land registry.

Appendix H - List of Landowners with Multiple Affected Parcels

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
Section 1	1	Silivri	Balaban	731/15 732/58	Ah** Ce**	2
	2	Silivri	Değirmenköy	463/91 371/17	Ah** Eş**	2
	3	Silivri	Balaban	734/50 734/18	Ah** Gü**	2
	4	Silivri	Değirmenköy	370/16 369/99	Al** Ça**	2
	5	Silivri	Alipaşa	8270/3 8270/14	Al** Çı**	2
	6	Silivri	Balaban	756/243 756/197	As** Oy**	2
	7	Silivri	Alipaşa	8270/2 8270/21	At** Er**	2
	8	Silivri	Yolçatı	4404/21 4403/17	Ay** Şa**	2
	9	Silivri	Gümüşyaka	7855/11 7854/3	Ay** Es**	2
	10	Silivri	Sancaktepe Balaban	232/22 734/181	Ay** Kı**	2
	11	Silivri	Yolçatı	4403/25 4403/30	Ay** Ta**	2
	12	Silivri	Çeltik Alipaşa	184/17 8276/150	Ay** Öz**	2
	13	Silivri	Değirmenköy	370/16 369/99	Bah** Çe**	2
	14	Silivri	Çeltik	184/79 184/18	Be** Do**	2
	15	Silivri	Balaban	732/100 732/126	Bü** Pe**	2
	16	Silivri	Değirmenköy	462/60 462/54	Ca** At**	2
	17	Silivri	Çeltik	181/117 184/78	Ci** Ay**	2
	18	Silivri	Sancaktepe	232/27 232/21	De** Se**	2
	19	Silivri	Çeltik	172/36 172/37	Du** Ak**	2
	20	Silivri	Çeltik	179/13 179/12	Du** Tü**	2
	21	Silivri	Yolçatı	4404/14 4404/15	Em** Ba**	2
	22	Silivri	Gümüşyaka	7854/5 7240/13	Er** Az**	2
	23	Silivri	Sancaktepe	243/15 233/22	Er** Ön**	2
	24	Silivri	Sancaktepe	131/22 131/21	Ev** Çe**	2
	25	Silivri	Balaban	732/93 732/20	Fa** Al**	2
	26	Silivri	Sancaktepe	131/22 131/21	Fa** Ad**	2
	27	Silivri	Gümüşyaka	7855/11 7854/3	Fa** De**	2
	28	Silivri	Değirmenköy	370/16 369/99	Fa** Di**	2
	29	Silivri	Gümüşyaka	7857/12 7857/13	Fa** Er**	2
	30	Silivri	Alipaşa	8276/147 8276/148	Fa** İr**	2
	31	Silivri	Gümüşyaka	7857/6 7240/11	Fe** Pa**	2
	32	Silivri	Yolçatı	4403/29 4403/17	Fu** Sa**	2
	33	Silivri	Alipaşa Yolçatı	8271/3 4403/7	Ga** Tu**	2
	34	Silivri	Alipaşa	8271/2 8271/1	Gö** Gü**	2
	35	Silivri	Balaban	734/50 734/48	Gö** Gü**	2
	36	Silivri	Değirmenköy	462/60 462/54	Gü** Pa**	2
	37	Silivri	Değirmenköy Gümüşyaka	369/84 7857/16	Gü** Bo**	2
	38	Silivri	Değirmenköy	369/100	Gü** Ça**	2

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				370/18		
	39	Silivri	Çeltik	173/108	Gü** Di**	2
				181/120		
	40	Silivri	Çeltik	181/117	Gü** Ay**	2
				184/78		
	41	Silivri	Değirmenköy	370/16	Ha** Ça**	2
				369/99		
	42	Silivri	Balaban	734/118	Ha** Ay**	2
				734/117		
	43	Silivri	Balaban	732/93	Ha** Al**	2
				732/20		
	44	Silivri	Balaban	734/50	Ha** Gü**	2
				734/48		
	45	Silivri	Değirmenköy	369/68	Hu** De**	2
				369/74		
	46	Silivri	Balaban	732/129	Hü** Yı**	2
				732/128		
	47	Silivri	Alipaşa	8270/19	İb** Er**	2
				8270/20		
	48	Silivri	Değirmenköy	370/10	İb** Gü**	2
				370/11		
	49	Silivri	Değirmenköy	370/21	İd** Tu**	2
				370/22		
	50	Silivri	Balaban	734/152	İl** Ta**	2
				734/138		
	51	Silivri	Alipaşa	8271/2	İn** Er**	2
				8271/1		
	52	Silivri	Çeltik	181/117	İn** Yı**	2
				184/78		
	53	Silivri	Değirmenköy	369/84	İs** Bo**	2
			Gümüşyaka	7857/16		
	54	Silivri	Değirmenköy	370/18	İs** Ça**	2
				369/100		
	55	Silivri	Çeltik	184/77	İs** Ta**	2
				184/25		
	56	Silivri	Sancaktepe	131/22	Ka** Me**	2
				131/21		
	57	Silivri	Değirmenköy	370/21	Ke** Al**	2
				370/22		
	58	Silivri	Değirmenköy	462/60	Ke** Bü**	2
				462/54		
	59	Silivri	Balaban	756/90	Ku** İl** An** Şi**	2
				756/83		
	60	Silivri	Alipaşa	8271/2	Ma** Gü**	2
				8271/1		
	61	Silivri	Balaban	734/127	Me** Çe**	2
				734/153		
	62	Silivri	Balaban	732/115	Me** Gö**	2
				732/116		
	63	Silivri	Çeltik	173/84	Me** Gü**	2
				173/85		
	64	Silivri	Çeltik	184/12	Me** İş**	2
				184/13		
	65	Silivri	Alipaşa	8271/8	Me** İs**	2
				8271/9		
	66	Silivri	Çeltik	184/77	Me** Ta**	2
				184/25		
	67	Silivri	Çeltik	184/19	Me** Ay**	2
				172/38		
	68	Silivri	Değirmenköy	462/60	Me** Ka**	2
				462/54		
	69	Silivri	Balaban	734/181	Mu** Kı**	2
				734/129		
	70	Silivri	Değirmenköy	370/18	Mü** Ça**	2
				369/100		
	71	Silivri	Semizkumlar	8358/1	Mü** Sa**	2
			Balaban	756/234		
	72	Silivri	Sancaktepe	243/21	Mu** So**	2
			Balaban	732/117		
	73	Silivri	Çeltik	173/103	Mu** Se**	2
				173/102		
	74	Silivri	Değirmenköy	370/16	Mu** Ça**	2
				369/99		
	75	Silivri	Balaban	732/93	Na** Du**	2
				732/20		
	76	Silivri	Çeltik	184/77	Ne** Ya**	2
				184/25		
	77	Silivri	Balaban	732/93	Ne** Al**	2
				732/20		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
	78	Silivri	Sancaktepe	131/22	Ne** Öz**	2
				131/21		
	79	Silivri	Çeltik	181/117	Ne** Ay**	2
				184/78		
	80	Silivri	Balaban	756/234	Ne** Di**	2
			Semizkumlar	8358/1		
	81	Silivri	Değirmenköy	462/60	Nu** Sa**	2
				462/54		
	82	Silivri	Çeltik	173/108	Nu** Ça**	2
				181/120		
	83	Silivri	Balaban	756/158	Nu** Se**	2
			Değirmenköy	370/48		
	84	Silivri	Sancaktepe	243/20	Oğ** Ya**	2
				243/18		
	85	Silivri	Değirmenköy	462/60	Öm** Bü**	2
				462/54		
	86	Silivri	Balaban	734/50	Öz** Ak**	2
				734/48		
	87	Silivri	Yolçatı	4403/2	Öz** Kö**	2
				4404/18		
	88	Silivri	Balaban	734/50	Oz** Ak**	2
				734/48		
	89	Silivri	Değirmenköy	463/78	Pe** At**	2
				462/46		
	90	Silivri	Değirmenköy	463/78	Pe** Gü**	2
				462/46		
	91	Silivri	Çeltik	173/108	Ra** Ye**	2
				181/120		
	92	Silivri	Değirmenköy	370/18	Ra** Ça**	2
				369/100		
	93	Silivri	Çeltik	183/25	Re** Ka**	2
				183/26		
	94	Silivri	Sancaktepe	232/23	Ru** Si**	2
			Balaban	756/187		
	95	Silivri	Gümüşyaka	7857/10	Şa** Or**	2
				7587/11		
	96	Silivri	Çeltik	181/117	Sa** Ay**	2
				184/78		
	97	Silivri	Balaban	756/158	Sa** Di**	2
			Değirmenköy	369/78		
	98	Silivri	Balaban	732/93	Şe** Al**	2
				732/20		
	99	Silivri	Değirmenköy	370/18	Şe** Ba**	2
				369/100		
	100	Silivri	Alipaşa	8270/19	Se** Er**	2
				8270/20		
	101	Silivri	Sancaktepe	131/22	Se** Me**	2
				131/21		
	102	Silivri	Yolçatı	4403/24	Se** Öz**	2
				4403/8		
	103	Silivri	Değirmenköy	463/78	Se** Tu**	2
				462/46		
	104	Silivri	Semizkumlar	8358/1	Se** Fi**	2
			Balaban	756/234		
	105	Silivri	Değirmenköy	463/78	Se** Gü**	2
				462/46		
	106	Silivri	Sancaktepe	131/36	Se** Ka**	2
			Balaban	732/121		
	107	Silivri	Değirmenköy	369/68	Si** Ku**	2
				369/74		
	108	Silivri	Alipaşa	8270/19	Şü** Er**	2
				8270/20		
	109	Silivri	Balaban	732/151	Şü** Ka**	2
				732/150		
	110	Silivri	Alipaşa	8270/19	Su** Er**	2
				8270/20		
	111	Silivri	Çeltik	179/14	Ta** Pa**	2
				179/15		
	112	Silivri	Gümüşyaka	7860/18	Tr** Ti** Ar** Ta** Ha**	2
				7860/19	Sa** Ti** Li** Şi**	
	113	Silivri	Sancaktepe	243/20	Uğ** Ya**	2
				243/18		
	114	Silivri	Değirmenköy	370/18	Üm** Ta**	2
				369/100		
	115	Silivri	Çeltik	172/38	Va** Ay**	2
				184/19		
	116	Silivri	Balaban	756/143	Ve** Er**	2
			Değirmenköy	369/90		
	117	Silivri	Balaban	734/50	Ya** Gü**	2

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				734/48		
	118	Silivri	Değirmenköy	370/16 369/99	Yü** Ça**	2
	119	Silivri	Çeltik	173/97 173/96	Ze** Ay**	2
	120	Silivri	Değirmenköy	370/21 370/22	Zü** Ka**	2
	121	Çorlu	Şahpaz	0/704 0/992	Ad** Ko**	2
	122	Marmaraereğlisi	Çeşmeli	184/4 184/1	Ad** Ga**	2
	123	Marmaraereğlisi	Yakuplu	196/16 196/14	Ad** Ye**	2
	124	Çorlu	Seymen	114/123 114/122	Ah** Gi**	2
	125	Marmaraereğlisi	Çeşmeli	184/7 178/4	Al** Sa**	2
	126	Çorlu	Seymen	105/26 9/36.	Al** Ba**	2
	127	Marmaraereğlisi	Yakuplu	202/53 207/12	Al** Er**	2
	128	Marmaraereğlisi	Yakuplu Çeşmeli	206/4 185/21	Ay** Ta**	2
	129	Marmaraereğlisi	Yakuplu Çeşmeli	206/4 185/21	Ba** Ta**	2
	130	Çorlu	Seymen Şahpaz	54/22 0/1037	Ba** Yu**	2
	131	Çorlu	Şahpaz	0/698 0/699	Bi** So**	2
	132	Marmaraereğlisi	Çeşmeli	185/20 184/3	Er** Ka**	2
	133	Marmaraereğlisi	Yakuplu	202/53 207/12	Fa** Ay**	2
	134	Çorlu	Seymen	105/22 105/25	Fa** Ba**	2
	135	Çorlu	Şahpaz	0/1142 0/1144	Fa** Ka**	2
	136	Marmaraereğlisi	Yakuplu	207/200 207/201	Fe** Öz**	2
	137	Çorlu	Şahpaz	0/1132 0/1130	Fe** Kı**	2
	138	Çorlu Marmaraereğlisi	Seymen Sultanköy	105/19 115/1	Fe** Ko**	2
	139	Marmaraereğlisi	Yakuplu	207/78 207/38	Fi**	2
	140	Çorlu	Seymen	105/22 105/25	Gü** Di**	2
	141	Çorlu	Seymen	105/22 105/25	Gü** Şi**	2
	142	Çorlu	Seymen	13/3 13/4	Gü** Yü**	2
	143	Marmaraereğlisi	Yakuplu	204/143 207/79	Ha** Ye**	2
	144	Çorlu	Şahpaz	0/680 0/988	Ha** Ya**	2
	145	Çorlu	Seymen	104/24 54/9	Ha** Ço**	2
	146	Marmaraereğlisi	Yakuplu	204/143 207/79	Ha** Ye**	2
	147	Çorlu Marmaraereğlisi	Seymen Cedit Ali Paşa	13/149 354/1	Ha** Or**	2
	148	Çorlu	Seymen	104/24 54/9	Ha** Ça**	2
	149	Çorlu	Seymen	143/1 114/76	Ha** Ağ**	2
	150	Çorlu	Şahpaz	0/1340 0/1338	Hi** De**	2
	151	Çorlu	Şahpaz	0/701 0/1102	Hi** Gö**	2
	152	Marmaraereğlisi	Çeşmeli	184/7 178/22	Hü** Sa**	2
	153	Çorlu	Seymen	115/74 114/40	Ke** Er**	2
	154	Marmaraereğlisi	Yakuplu	207/41 207/42	Ke** İn** Te** Or** Ür** Gı** Sa** Ti** Li** Şi**	2
	155	Çorlu	Şahpaz	0/1147 0/702	Me** Bo**	2
	156	Marmaraereğlisi	Yakuplu	202/17	Me** De**	2

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				207/45		
	157	Çorlu	Seymen	143/1	Mi** Or**	2
				114/76		
	158	Marmaraereğlisi	Yakuplu	202/53	Mü** Er**	2
				202/35		
	159	Çorlu	Seymen	143/4	Mü** Ay**	2
				114/78		
	160	Marmaraereğlisi	Yakuplu	202/53	Mu** İn**	2
				207/12		
	161	Çorlu	Şahpaz	0/700	Na** Öz**	2
				0/1017		
	162	Çorlu	Seymen	114/39	Na** İş**	2
				94/13		
	163	Marmaraereğlisi	Yakuplu	207/166	Na** Ze**	2
				195/28		
	164	Marmaraereğlisi	Yakuplu	207/143	Na** Al**	2
				207/79		
	165	Marmaraereğlisi	Yakuplu	169/15	Ne** Ya**	2
				196/13		
	166	Marmaraereğlisi	Yakuplu	169/15	Ne** Gü**	2
				196/13		
	167	Marmaraereğlisi	Yakuplu	169/15	Ne** Ke**	2
				196/13		
	168	Marmaraereğlisi	Yakuplu	202/53	Ni** Öz**	2
				207/12		
	169	Çorlu	Seymen	105/22	Nu** Yı**	2
				105/25		
	170	Marmaraereğlisi	Yakuplu	206/4	Ok** Te**	2
			Çeşmeli	185/21		
	171	Çorlu	Seymen	114/97	Öm** Tü**	2
				114/96		
	172	Çorlu	Seymen	13/3.	Or** Yü**	2
				13/4.		
	173	Çorlu	Şahpaz	0/698	Öz** Çı**	2
				0/699		
	174	Çorlu	Seymen	13/2.	Öz** De**	2
		Marmaraereğlisi	Yakuplu	195/46		
	175	Çorlu	Seymen	13/3	Pe** Yü**	2
				13/4		
	176	Çorlu	Şahpaz	0/1132	Ra** Al**	2
				0/1130		
	177	Marmaraereğlisi	Çeşmeli	178/4	Re** Se**	2
				171/24		
	178	Marmaraereğlisi	Yakuplu	206/4	Re** Ta**	2
			Çeşmeli	185/21		
	179	Marmaraereğlisi	Cedit Ali Paşa	354/3	Rı** Kı**	2
				354/4		
	180	Marmaraereğlisi	Yakuplu	207/161	Şa** Ül**	2
				202/38		
	181	Çorlu	Şahpaz	0/698	Şa** Çı**	2
				0/699		
	182	Çorlu	Seymen	114/85	Se** Ba**	2
		Marmaraereğlisi	Sultanköy	116/4		
	183	Marmaraereğlisi	Yakuplu	207/179	Se** Ce**	2
				207/140		
	184	Çorlu	Seymen	114/73	Se** Er**	2
				114/72		
	185	Marmaraereğlisi	Türkmenli	121/1	Se** Ul**	2
			Çeşmeli	175/39		
	186	Çorlu	Şahpaz	0/1132	Şe** Kı**	2
				0/1130		
	187	Çorlu	Seymen	105/22	Şü** Ol**	2
				105/25		
	188	Marmaraereğlisi	Çeşmeli	185/23	Ta** Öz**	2
				177/1		
	189	Çorlu	Seymen	13/3	Te** Yü**	2
				13/4		
	190	Çorlu	Seymen	143/1	Tü** Ağ**	2
				114/76		
	191	Marmaraereğlisi	Yakuplu	206/4	Yı** Ta**	2
			Çeşmeli	185/21		
	192	Marmaraereğlisi	Yakuplu	206/4	Za** Ta**	2
			Çeşmeli	185/21		
	193	Marmaraereğlisi	Yakuplu	169/15	Ze** Ke**	2
				196/13		
Section 2	194	Süleymanpaşa	Kayı	0/768	Al** Uç**	2
				0/776		
	195	Süleymanpaşa	Kayı	0/725	Ay** Se**	2
				0/782		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
	196	Süleymanpaşa	Kayı	0/794 0/671	Ay** Te**	2
	197	Süleymanpaşa	Kayı	0/798 0/760	Bü** Ba**	2
	198	Süleymanpaşa	Kayı	0/794 0/671	Ce** Ay**	2
	199	Süleymanpaşa	Kayı	0/767 0/762	Er** Ku**	2
	200	Süleymanpaşa	Kayı	0/798 0/760	Fe** Ba**	2
	201	Süleymanpaşa	Kayı	0/767 0/762	Gi** Ök**	2
	202	Süleymanpaşa	Kayı	0/767 0/762	Ha** At**	2
	203	Süleymanpaşa	Kayı	0/1630 0/1595	Ha** Ka**	2
	204	Süleymanpaşa	Kayı	0/794 0/671	Ha** Ay**	2
	205	Süleymanpaşa	Kayı	0/768 0/776	Hü** Ya**	2
	206	Süleymanpaşa	Kayı	0/767 0/762	Hü** At**	2
	207	Süleymanpaşa	Kayı	0/1126 0/1127	İh** Gö**	2
	208	Süleymanpaşa	Kayı	0/767 0/762	İr** De**	2
	209	Süleymanpaşa	Kayı	0/1590 0/1491	Ka** Ön**	2
	210	Süleymanpaşa	Kayı	0/773 0/764	Ke** Kö**	2
	211	Süleymanpaşa	Kayı	0/1593 0/727	Mi** Ba**	2
	212	Süleymanpaşa	Kayı Zafer	0/765 347/15	Mi** Sa**	2
	213	Süleymanpaşa	Kayı	0/1593 0/727	Mu** Çi**	2
	214	Süleymanpaşa	Kayı	0/798 0/760	Ne** Be**	2
	215	Süleymanpaşa	Kayı	0/766 0/763	Ne** Ko**	2
	216	Süleymanpaşa	Kayı	0/762 0/767	Nu** İş**	2
	217	Süleymanpaşa	Kayı	0/1630 0/1595	Ra** Ka**	2
	218	Süleymanpaşa	Kayı	0/727 0/1593	Sa** Çi**	2
	219	Süleymanpaşa	Kayı	0/727 0/1593	Şe** Öz**	2
	220	Süleymanpaşa	Kayı	0/767 0/762	Si** Ka**	2
	221	Süleymanpaşa	Kayı	0/768 0/776	Üm** Ka**	2
Section 3	222	Süleymanpaşa	Seymenli	107/12 107/10	Ah** Ba**	2
	223	Süleymanpaşa	Nusratfakı	103/10 103/9	Ah** De**	2
	224	Süleymanpaşa	Nusratfakı	106/37 109/9	Ah** Or**	2
	225	Süleymanpaşa	Seymenli	107/2 107/11	Al** Ad**	2
	226	Süleymanpaşa	Nusratlı	0/3. 0/2.	Al** Gü**	2
	227	Süleymanpaşa	Akçahalil	108/28 106/36	Al** Ka**	2
	228	Süleymanpaşa	İnecik	160/12 160/13	Al** Ku**	2
	229	Malkara	Yenice	129/23 129/22	Al** Ma**	2
	230	Süleymanpaşa	Seymenli	112/1 113/32	Al** Öz**	2
	231	Süleymanpaşa	İnecik	161/17 205/140	Al** Te**	2
	232	Süleymanpaşa	Nusratfakı İnecik	113/40 156/33	Al** Ün**	2
	233	Süleymanpaşa	İnecik	160/12 160/13	As** Co**	2
	234	Süleymanpaşa	Seymenli	136/5 107/60	Ay** Ko**	2
	235	Süleymanpaşa	Seymenli	136/5	Ay** Ka**	2

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				107/60		
	236	Süleymanpaşa	İnecik	156/23	Ce** İl**	2
				160/9		
	237	Süleymanpaşa	Karahisarlı	103/6	Ed** Ak**	2
				106/101		
	238	Süleymanpaşa	Seymenli	107/2	Em** Ad**	2
				107/11		
	239	Süleymanpaşa	Nusratlı	0/1148	Em** Gö**	2
				0/1149		
	240	Süleymanpaşa	Seymenli	107/1	Em** Ka**	2
				107/9		
	241	Süleymanpaşa	İnecik	160/12	Em** Ke**	2
				160/13		
	242	Süleymanpaşa	Nusratfakı	103/11	Em** Ku**	2
				103/13		
	243	Süleymanpaşa	Seymenli	107/1	Em** Yı**	2
				107/9		
	244	Süleymanpaşa	Seymenli	107/2	Er** Ad**	2
				107/11		
	245	Süleymanpaşa	Seymenli	107/1	Ey** Uy**	2
				107/9		
	246	Süleymanpaşa	İnecik	160/14	Fa** Te**	2
				205/124		
	247	Süleymanpaşa	Seymenli	107/1	Fa** Yı**	2
				107/9		
	248	Süleymanpaşa	Nusratlı	0/1126	Fa** İl**	2
				0/690		
	249	Malkara	Ahievren	0/841	Fa** Öz**	2
				0/1267		
	250	Süleymanpaşa	Güveçli	109/67	Fa** Tü**	2
			Nusratfakı	103/14		
	251	Süleymanpaşa	Nusratlı	0/1126	Fe** Bu**	2
				0/690		
	252	Süleymanpaşa	Akçahalil	108/12	Fe** Ay**	2
				106/57		
	253	Malkara	Hereke	0/1280	Fi** İn**	2
				0/1279		
	254	Süleymanpaşa	Karahisarlı	102/1	Gü** Al**	2
				102/9		
	255	Süleymanpaşa	Seymenli	108/1	Gü** Yı**	2
				108/3		
	256	Süleymanpaşa	İnecik	160/12	Ha** Ku**	2
				160/13		
	257	Süleymanpaşa	İnecik	160/12	Ha** Ku**	2
				160/13		
	258	Süleymanpaşa	Nusratfakı	103/11	Ha** De**	2
				103/13		
	259	Süleymanpaşa	Seymenli	136/5	Ha** Di**	2
				107/60		
	260	Süleymanpaşa	Güveçli	113/17	Ha** Tu**	2
				113/19		
	261	Malkara	Yenice	125/21	Ha** Do**	2
				129/18		
	262	Süleymanpaşa	Nusratfakı	106/37	Ha** Or**	2
				109/9		
	263	Süleymanpaşa	İnecik	161/12	Ha** Öz**	2
				161/13		
	264	Süleymanpaşa	Nusratlı	0/708	Ha** Çe**	2
				0/707		
	265	Süleymanpaşa	Seymenli	113/1	Hi** Şe**	2
				113/4		
	266	Malkara	Hereke	0/402	Hü** Öz**	2
				0/399		
	267	Süleymanpaşa	Akçahalil	102/72	Hü** Se**	2
				102/73		
	268	Süleymanpaşa	Nusratfakı	107/48	İb** Se**	2
				118/5		
	269	Süleymanpaşa	Seymenli	108/1	İb** Yı**	2
				108/3		
	270	Süleymanpaşa	Akçahalil	106/58	İm** Ay**	2
				106/59		
	271	Süleymanpaşa	İnecik	160/12	İr** Ku**	2
				160/13		
	272	Süleymanpaşa	Nusratfakı	103/11	İs** De**	2
				103/13		
	273	Süleymanpaşa	Nusratfakı	103/10	İs** De**	2
				103/9		
	274	Süleymanpaşa	İnecik	160/12	İs** Ku**	2
				160/13		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
	275	Süleymanpaşa	Seymenli	113/158 113/79	İs** Or**	2
	276	Malkara	Hereke	0/409 0/1124	İs** Uz**	2
	277	Süleymanpaşa	İnecik	205/110 205/107	Ja** Gü**	2
	278	Malkara	Ahievren	0/354 0/1272	Ka** Ka**	2
	279	Süleymanpaşa	Karahisarlı	103/6 106/101	Le** Ak**	2
	280	Süleymanpaşa	İnecik	160/138 161/19	Le** Gü**	2
	281	Süleymanpaşa	Nusratfakı	103/10 103/9	Lü** De**	2
	282	Süleymanpaşa	Seymenli	108/1 108/3	Lü** Yı**	2
	283	Süleymanpaşa	Nusratfakı	103/11 103/13	Me** De**	2
	284	Süleymanpaşa	Seymenli	113/158 113/79	Me** Or**	2
	285	Süleymanpaşa	Güveçli	109/53 109/58	Me** Fa**	2
	286	Süleymanpaşa	Nusratlı	0/1120 0/1121	Mu** Ka**	2
	287	Süleymanpaşa	Nusratlı	0/1126 0/690	Mu** Bu**	2
	288	Süleymanpaşa	Nusratfakı	103/11 103/13	Mu** De**	2
	289	Malkara	Yenice	125/8 125/23	Mu** Yı**	2
	290	Süleymanpaşa	Seymenli	108/1 108/3	Mu** Yı**	2
	291	Süleymanpaşa	Nusratfakı	118/25 118/15	Na** Me**	2
	292	Süleymanpaşa	Nusratfakı	118/23 118/21	Na** Ön**	2
	293	Süleymanpaşa	Nusratlı	0/1102 0/1103	Na** Ak**	2
	294	Süleymanpaşa	Akçahalil	108/30 108/15	Na** Du**	2
	295	Süleymanpaşa	Güveçli	113/17 113/19	Na** Tu**	2
	296	Süleymanpaşa	Karahisarlı	102/16 102/15	Na** Ya**	2
	297	Süleymanpaşa	Güveçli	109/53 109/58	Ne** Fa**	2
	298	Malkara	Yenice	124/2 149/6	Nu** Do**	2
	299	Süleymanpaşa	Güveçli Nusratlı	109/41 0/1327	Nu** Ör**	2
	300	Süleymanpaşa	İnecik	160/139 198/45	Öz** Ko**	2
	301	Malkara	Ahievren	0/1283 0/1279	Ra** Ku**	2
	302	Süleymanpaşa	Güveçli	113/17 113/19	Ra** Tu**	2
	303	Süleymanpaşa	Akçahalil	106/25 102/41	Ra** Ay**	2
	304	Süleymanpaşa	Akçahalil	102/41 102/77	Ra** Şi**	2
	305	Süleymanpaşa	İnecik	161/14 205/137	Re** Di**	2
	306	Süleymanpaşa	Karahisarlı	103/6 106/101	Re** Ak**	2
	307	Süleymanpaşa	Seymenli	136/5 107/60	Ru** Be**	2
	308	Süleymanpaşa	Seymenli	107/1 107/9	Şa** Du**	2
	309	Malkara	Ahievren	0/331 0/332	Şa** Öz**	2
	310	Süleymanpaşa	Akçahalil	106/25 102/41	Şa** Er**	2
	311	Süleymanpaşa	Güveçli	109/59 109/65	Sa** Me**	2
	312	Malkara	Ahievren	0/345 0/1289	Sa** Pa**	2
	313	Süleymanpaşa	Seymenli	108/1 108/3	Sa** Yı**	2
	314	Süleymanpaşa	Seymenli	107/1	Se** Du**	2

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				107/9		
	315	Süleymanpaşa	Akçahalil	154/15 153/3	Se** Öz**	2
	316	Süleymanpaşa	Seymenli	107/44 107/45	Şe** Mi**	2
	317	Süleymanpaşa	Akçahalil	108/10 147/1	Se** Se**	2
	318	Süleymanpaşa	İnecik	160/129 198/44	Şe** Gü**	2
	319	Süleymanpaşa	Güveçli	109/60 109/68	Şe** Kı**	2
	320	Süleymanpaşa	Seymenli	107/2 107/11	Se** Ad**	2
	321	Süleymanpaşa	Akçahalil	106/25 102/41	Se** Ül**	2
	322	Süleymanpaşa	Nusratfakı	103/10 103/9	Sü** Dü**	2
	323	Malkara	Ahievren	0/307 0/1285	Ta** Ta**	2
	324	Süleymanpaşa	İnecik	156/19 198/53	Ta** İz**	2
	325	Süleymanpaşa	Seymenli	108/1 108/3	Tü** Ka**	2
	326	Süleymanpaşa	Seymenli	107/30 107/31	Tu** Dö**	2
	327	Süleymanpaşa	Akçahalil	106/29 106/31	Ül** Ay**	2
	328	Süleymanpaşa	Akçahalil	102/41 106/25	Ür** Ay**	2
	329	Malkara	Yenice	125/19 129/19	Ya** Öz**	2
	330	Süleymanpaşa	Akçahalil	106/34 102/26	Yü** Yo**	2
	331	Süleymanpaşa	Nusratfakı	107/51 107/52	Zu** Ma**	2
Section 1	332	Silivri	Değirmenköy	463/76 462/66 370/58	Ah** To**	3
	333	Silivri	Gümüşyaka	7858/5 7858/11 7854/3	Ay** Ag**	3
	334	Silivri	Balaban	734/126 734/125 734/124	Er** Er**	3
	335	Silivri	Yolçatı	4403/24 4403/4 4403/8	Fa** Ca**	3
	336	Silivri	Değirmenköy Balaban	369/89 756/70 756/126	Fa** Bi**	3
	337	Silivri	Çeltik	172/105 173/101 179/17	Fa** Tu**	3
	338	Silivri	Çeltik	173/110 173/109 173/111	Ha** Av**	3
	339	Silivri	Değirmenköy	312/13 312/14 213/10	Ha** Ya**	3
	340	Silivri	Balaban	734/159 734/158 734/157	Hü** Ca**	3
	341	Silivri	Sancaktepe	244/21 233/52 232/33	İb** Kö*	3
	342	Silivri	Çeltik	173/88 173/90 173/89	Mü** Ma**	3
	343	Silivri	Değirmenköy	463/80 371/12 371/11	Mu** Bo**	3
	344	Silivri	Sancaktepe	233/91 233/74 233/86	Mü** Çı**	3
	345	Silivri	Çeltik	173/106 173/107 173/105	Mu** Av**	3
	346	Silivri	Sancaktepe	232/17 232/16	Na** Se**	3

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				232/15		
	347	Silivri	Balaban	756/234	Ne** Sa**	3
			Semizkumlar	8358/3		
				8358/1		
	348	Silivri	Çeltik	172/38	Ne** Ay**	3
				181/124		
				184/19		
	349	Silivri	Sancaktepe	232/17	Ne** Se**	3
				232/16		
				232/15		
	350	Silivri	Değirmenköy	463/93	Nu** Tu**	3
				462/77		
				370/13		
	351	Silivri	Balaban	732/118	Nu** Bi**	3
				732/109		
				732/57		
	352	Silivri	Çeltik	173/93	Ra** Gü**	3
				173/8		
				183/35		
	353	Silivri	Balaban	756/1	Ru** Gü**	3
				756/198		
				756/285		
	354	Silivri	Çeltik	173/108	Sa** Ye**	3
				181/120		
				181/123		
	355	Silivri	Çeltik	183/123	Sa** Av**	3
				183/124		
				181/122		
	356	Silivri	Değirmenköy	463/93	Se** Ka**	3
				462/77		
				370/13		
	357	Silivri	Çeltik	172/38	Ül** Kö**	3
				181/124		
				184/19		
	358	Silivri	Çeltik	184/24	Ve** Sa**	3
				184/23		
				184/16		
	359	Silivri	Çeltik	183/34	Ye** De**	3
				173/94		
				173/7		
	360	Silivri	Çeltik	181/124	Zü** Er**	3
				184/19		
				172/38		
	361	Marmaraereğlisi	Yakuplu	207/163	Ah** Me**	3
				207/64		
				207/32		
	362	Marmaraereğlisi	Çeşmeli	185/22	Ah** Ha**	3
				178/20		
				177/4		
	363	Marmaraereğlisi	Yakuplu	207/143	Al** Ye**	3
				196/14		
				207/79		
	364	Marmaraereğlisi	Yakuplu	200/1	Ar** Tü**	3
				207/61		
				207/11		
	365	Marmaraereğlisi	Yakuplu	200/1	Ay** Ül**	3
				207/61		
				207/11		
	366	Marmaraereğlisi	Yakuplu	207/143	Ba** Ye	3
				196/16		
				207/79		
	367	Marmaraereğlisi	Çeşmeli	184/6	Ha** Ha**	3
				177/3		
				174/1		
	368	Çorlu	Seymen	114/83	Hü** Kı**	3
				114/81		
				114/80		
	369	Marmaraereğlisi	Yakuplu	202/61	İb** Bi**	3
				207/71		
				207/70		
	370	Marmaraereğlisi	Yakuplu	207/61	İs** Ya**	3
				207/11		
				200/1		
	371	Marmaraereğlisi	Yakuplu	207/61	Ke** Ya**	3
				207/11		
				200/1		
	372	Marmaraereğlisi	Çeşmeli	174/2	Nu** Ku**	3
				171/3		
			Yakuplu	202/62		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
	373	Çorlu	Şahpaz	0/1172 0/1171 0/1166	Ok** Ul**	3
	374	Marmaraereğlisi	Yakuplu	200/1 207/61 207/11	Re** Ya**	3
	375	Çorlu	Şahpaz	0/991 0/994 0/993	Sa** Gü**	3
Section 2	376	Süleymanpaşa	Kayı	0/1554 0/708 0/765	Ah** Yi**	3
	377	Süleymanpaşa	Kayı	0/794 0/671 0/672	Ce** Ay**	3
	378	Süleymanpaşa	Kayı	0/771 0/797 0/759	Em** Gü**	3
Section 3	379	Süleymanpaşa	İnecik	156/19 198/54 198/53	Ah** İz**	3
	380	Süleymanpaşa	İnecik	198/52 201/10 198/51	Ay** De**	3
	381	Süleymanpaşa	Akçahalil	108/14 102/76 102/75	Ay** Şi**	3
	382	Süleymanpaşa	Akçahalil	108/14 102/76 102/75	Ay** Şi**	3
	383	Süleymanpaşa	Karahisarli	102/1 102/2 102/9	Bi** Ya**	3
	384	Süleymanpaşa	İnecik	160/133 160/135 160/136	Ca** Kı**	3
	385	Süleymanpaşa	Nusratlı	0/705 0/704 0/703	Cü** Pa**	3
	386	Süleymanpaşa	Seymenli	107/2 107/11 107/13	Di** Ad**	3
	387	Süleymanpaşa	Nusratlı	0/705 0/704 0/703	Es** Ya**	3
	388	Süleymanpaşa	İnecik	201/10 198/51 198/52	Fa**Ku**	3
	389	Süleymanpaşa	Nusratlı	0/705 0/704 0/703	Fa** Tü**	3
	390	Süleymanpaşa	Nusratlı	0/705 0/704 0/703	Fa** Ya**	3
	391	Süleymanpaşa	İnecik Seymenli	205/109 205/100 136/3	Ga** Be** Tu** Ta** Ha** İn** An** Şi**	3
	392	Süleymanpaşa	Karahisarli	102/1 102/2 102/9	G** İn**	3
	393	Süleymanpaşa	Güveçli	109/45 109/56 112/6	Ha** Kı**	3
	394	Süleymanpaşa	İnecik	201/10 198/51 198/52	Ha** Te**	3
	395	Malkara	Yenice	113/15 125/9 125/26	Ha** Yı**	3
	396	Süleymanpaşa	İnecik	201/10 198/51 198/52	Hü** Te**	3
	397	Malkara	Yenice	0/1280 0/531 0/544	İs** Ma**	3
	398	Süleymanpaşa	İnecik	156/19 198/54 198/53	İz** İz**	3
	399	Süleymanpaşa	Nusratlı	0/705	Me** Gö**	3

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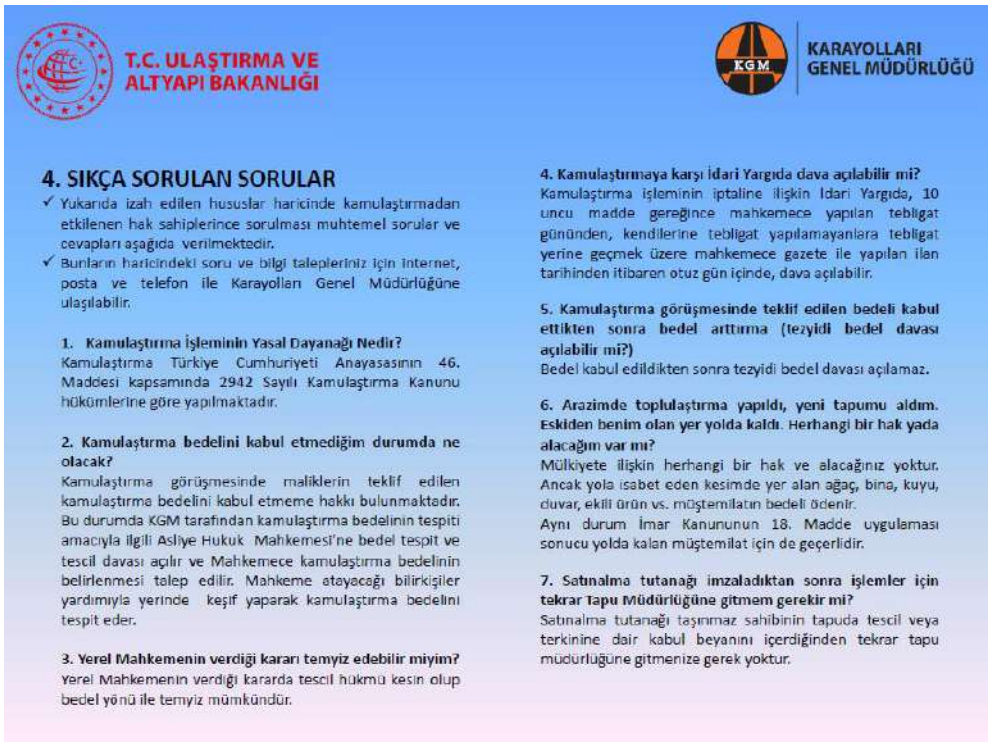
				0/704		
				0/703		
	400	Süleymanpaşa	Akçahalil	108/31	Me** Ka**	3
				106/24		
				106/36		
	401	Süleymanpaşa	Nusratfakı	107/46	Me** Mi**	3
				107/47		
				107/25		
	402	Süleymanpaşa	Nusratlı	0/705	Me** Tu**	3
				0/704		
				0/703		
	403	Süleymanpaşa	İnecik	156/30	Mu** Öz**	3
				205/103		
				205/102		
	404	Süleymanpaşa	Nusratlı	0/705	Mu** Pa**	3
				0/704		
				0/703		
	405	Süleymanpaşa	İnecik	160/22	Na** Di**	3
				160/20		
				160/21		
	406	Süleymanpaşa	Nusratlı	0/705	Na** Kar**	3
				0/704		
				0/703		
	407	Süleymanpaşa	İnecik	201/10	Na** At**	3
				198/51		
				198/52		
	408	Süleymanpaşa	Nusratlı	0/705	Ne** Ya**	3
				0/704		
				0/703		
	409	Süleymanpaşa	İnecik	201/10	Ne** Te**	3
				198/51		
				198/52		
	410	Süleymanpaşa	Nusratfakı	106/6	Ni** Ün**	3
				106/8		
				118/51		
	411	Süleymanpaşa	Akçahalil	106/30	Or** Kı**	3
				154/3		
				102/39		
	412	Süleymanpaşa	İnecik	106/18	Ra** Öz**	3
				106/17		
				106/19		
	413	Süleymanpaşa	Güveçli	109/42	Re** Ka**	3
				109/44		
				109/55		
	414	Süleymanpaşa	İnecik	156/19	Sa** İz**	3
				198/54		
				198/53		
	415	Süleymanpaşa	İnecik	201/10	Şe** At**	3
				198/51		
				198/52		
	416	Süleymanpaşa	Akçahalil	108/36	Ve** Me**	3
				102/58		
				102/57		
	417	Süleymanpaşa	Karahisarli	102/1	Yı** Al**	3
				102/2		
				102/9		
	418	Süleymanpaşa	Nusratfakı	107/49	Yü** Ko**	3
				118/53		
				118/52		
Section 1	419	Silivri	Değirmenköy	370/15	Gü** Ça**	4
				370/16		
				369/98		
				369/99		
	420	Silivri	Balaban	756/196	Ha** Öz**	4
			Değirmenköy	463/93		
				462/77		
				370/13		
	421	Çorlu	Seymen	13/145	Ab** Or**	4
				13/144		
				54/32		
		Marmaraereğlisi	Sultanköy	116/2		
	422	Marmaraereğlisi	Yakuplu	200/1	İh** Ya**	4
				207/61		
				207/11		
				195/22		
	423	Çorlu	Seymen	13/145	Ka** Kı**	4
				13/144		
				54/32		
		Marmaraereğlisi	Sultanköy	116/2		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
	424	Çorlu	Seymen	104/17	Me** D**	4
				105/22		
				105/25		
				105/47		
	425	Marmaraereğlisi	Yakuplu	207/143	Me** Ya**	4
				196/16		
				196/14		
				207/79		
	426	Marmaraereğlisi	Yakuplu	207/143	Mü** Va**	4
				196/16		
				196/14		
				207/79		
	427	Çorlu	Seymen	114/58	Sa** İl**	4
				114/67		
				9/42.		
				9/5.		
	428	Marmaraereğlisi	Yakuplu	207/143	Se** Şa**	4
				196/16		
				196/14		
				207/79		
	429	Çorlu	Şahpaz	0/1142	Şü** Kı**	4
				0/1144		
				0/681		
		Marmaraereğlisi	Çeşmeli	171/24		
	430	Marmaraereğlisi	Yakuplu	202/28	Ün** Yı**	4
				202/43		
				202/42		
				202/20		
	431	Marmaraereğlisi	Çeşmeli	171/12	Ya** Pe**	4
				171/28		
				171/13		
				171/19		
Section 2	432	Süleymanpaşa	Kayı	0/1117	Ah** Ön**	4
				0/1115		
				0/1113		
				0/1590		
Section 3	433	Süleymanpaşa	Akçahalil	108/14	An** Şi**	4
				102/75		
				102/74		
				102/76		
	434	Süleymanpaşa	Güveçli	109/56	Ay** Kı**	4
				109/69		
				112/6		
				109/45		
	435	Süleymanpaşa	Güveçli	109/56	İs** Kı**	4
				109/69		
				112/6		
				109/45		
	436	Süleymanpaşa	Güveçli	109/56	Hü** Kı**	4
				109/69		
				112/6		
				109/45		
	437	Süleymanpaşa	Güveçli	109/56	Şü** Yo**	4
				109/69		
				112/6		
				109/45		
	438	Süleymanpaşa	Güveçli	109/56	Nu** Yı**	4
				109/69		
				112/6		
				109/45		
	439	Süleymanpaşa	Akçahalil	106/56	Ha** Öz**	4
				153/2		
				153/3		
				102/34		
	440	Süleymanpaşa	İnecik	161/16	Mu** To**	4
				161/18		
				205/117		
				195/6		
	441	Süleymanpaşa	Seymenli	107/46	Şü** Er**	4
				107/47		
				107/71		
			Güveçli	109/35		
	442	Süleymanpaşa	Nusratfakı	113/49	Sü** Mi**	4
				113/48		
				113/47		
				113/46		
	443	Malkara	Ahievren	0/352	Me** Kö**	4
				0/1206		
				0/1207		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				0/1298		
Section 1	444	Silivri	Çeltik	173/4	Ha** Be**	5
				173/5		
				183/23		
				183/24		
				183/22		
	445	Silivri	Gümüşyaka	7855/9	Me** Ah**	5
				7240/12		
				7240/19		
				7240/14		
				7240/20		
	446	Çorlu	Seymen	105/15	Ha** Da**	5
				94/11		
				94/10		
				94/9		
				54/21		
	447	Çorlu	Seymen	94/14	Ha** Or**	5
				13/145		
				13/144		
				54/32		
		Marmaraereğlisi	Sultanköy	116/2		
	448	Çorlu	Seymen	105/15	Şa** O**	5
				94/11		
				94/10		
				94/9		
				54/21		
	449	Marmaraereğlisi	Yakuplu	202/44	Si** De**	5
				202/47		
				202/48		
				202/19		
				202/18		
Section 3	450	Süleymanpaşa	İnecik	160/140	Me** Ün**	5
				161/20		
				201/8		
				198/57		
				198/23		
	451	Süleymanpaşa	İnecik	160/141	Öm** Un**	5
				161/20		
				201/8		
				198/57		
				198/23		
Section 1	452	Silivri	Sancaktepe	244/21	Ce** Kö**	6
				233/55		
				233/52		
				233/51		
				233/15		
				232/33		
	453	Silivri	Sancaktepe	244/21	Di** Kö*	6
				233/55		
				233/52		
				233/51		
				233/15		
				232/33		
	454	Silivri	Sancaktepe	244/21	Ha** Ya**	6
				233/55		
				233/52		
				233/51		
				233/15		
				232/33		
	455	Silivri	Sancaktepe	244/21	Hi** Gü**	6
				233/55		
				233/52		
				233/51		
				233/15		
				232/33		
	456	Silivri	Sancaktepe	244/21	Se** Kö**	6
				233/55		
				233/52		
				233/51		
				233/15		
				232/33		
	457	Çorlu	Şahpaz	0/836	Ce* Gü*	6
				0/768		
				0/1119		
				0/673		
				0/674		
		Marmaraereğlisi	Çeşmeli	171/24		
	458	Marmaraereğlisi	Yakuplu	202/65	Öm** To**	6
				202/64		

Section	No	District	Neighbourhood	Parcel No	Owner's Name	Total Number of Parcels
				196/14		
				202/33		
				207/33		
				207/34		
Section 1	459	Silivri	Çeltik	173/80	Ay** Ki**	7
				173/82		
				173/79		
				173/81		
				183/41		
				183/42		
				183/43		
	460	Silivri	Çeltik	173/80	Ka** Ka**	7
				173/82		
				173/79		
				173/81		
				183/41		
				183/42		
				183/43		
	461	Silivri	Çeltik	173/80	Şe** Ka**	7
				173/82		
				173/79		
				173/81		
				183/41		
				183/42		
				183/43		
	462	Çorlu	Seymen	105/15	Hü** Tu**	7
				105/65		
				94/11		
				94/10		
				94/9		
				54/13		
				54/21		
Section 1	463	Silivri	Balaban	756/159	Sa** Di**	8
				756/88		
				756/80		
			Değirmenköy	463/86		
				370/54		
		Marmaraereğlisi	Yakuplu	207/146		
		Çorlu	Şahpaz	0/1169		
				0/1168		
	464	Silivri	Balaban	756/159	Na** Ul**	8
				756/88		
				756/80		
			Değirmenköy	463/86		
				370/54		
		Marmaraereğlisi	Yakuplu	207/146		
		Çorlu	Şahpaz	0/1169		
				0/1168		
	465	Silivri	Balaban	732/96	Ya** Ba**	10
				732/97		
				732/95		
				732/94		
				732/82		
				732/83		
				732/81		
				732/77		
				756/160		
			Değirmenköy	463/88		

Appendix I - KGM's Booklet on Procedural Steps in Expropriation Processes (Cover Page and Sample Page for Frequently Asked Questions)



Appendix J - Vulnerability Matrix for Economically Displaced Households

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
1	Silivri	Çeltik	181/118																	0	0	0	X	X				
2	Silivri	Çeltik	180/22							X (65)										1	1	0	X					X
3	Silivri	Çeltik	179/19									X (68)								1	1	0	X					
4	Silivri	Çeltik	184/27												X (24)					1	0	1	X					
5	Silivri	Çeltik	173/94								X (66)									1	0	1	X					X
			173/93																									
			173/95																									
			173/92																									
			173/91																									
			183/23																									
			183/35																									
			183/36																									
			183/34																									
			183/121																									
			183/22																									
		Yolçatı	4403/2																									
			4403/3																									
			4404/14																									
			4404/15																									
			4404/18																									
6	Silivri	Çeltik	184/78																	0	0	0	X					X
7	Silivri	Çeltik	173/103								X (56)									1	0	1	X					X
			173/101																									
			173/102																									
			172/105																									
			179/17																									
8	Silivri	Çeltik	173/8							X (72)	X (73)				X (46)		X (46)			3	1	2	X					
			173/104																									
9	Silivri	Çeltik	181/120																	0	0	0	X					X
			181/123																									
		Alipaşa	8276/46																									
10	Silivri	Çeltik	184/32																	0	0	0	X					X
			172/106																									
11	Silivri	Çeltik	183/24				X (84)	X (80)	X (84)											2	1	1	X					X
			183/22																									
			183/23																									
			173/4																									
			173/5																									
12	Silivri	Çeltik	180/18				X (76)													1	0	1						X
			172/32																									
13	Silivri	Çeltik	184/19																	0	0	0	X					X
			172/38																									
			181/24																									
14	Silivri	Çeltik	172/36																	0	0	0	X	X				X
			172/37																									
15	Silivri	Çeltik	180/17																	0	0	0	X					X
			184/23																									
			184/24																									
			184/30																									
			184/31																									
			184/16																									
16	Silivri	Çeltik	172/107				X (72)													1	0	1	X					X
			173/99																									

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
			173/108																									
			173/5																									
			173/100																									
17	Silivri	Yolçatı	4403/24																	0	0	0	X					X
			4403/4																									
			4403/5																									
			4403/8																									
			4403/9																									
			4403/13																									
			4403/20																									
		Alipaşa	8270/4																									
			8270/15																									
			8270/16																									
18	Silivri	Yolçatı	4403/1								X (66)									1	0	1	X					
19	Silivri	Yolçatı	4403/16							X (73)										1	1	0	X					
			4403/25																									
			4403/30																									
			4407/17																									
20	Silivri	Yolçatı	4404/21																	0	0	0	X					X
			4403/17																									
21	Silivri	Yolçatı	4403/12		X					X (49)										2	1	1	X	X				
22	Silivri	Balaban	734/135							X (56)	X(63)									2	1	1	X				X	
23	Silivri	Balaban	734/152																	0	0	0	X			35%		X
			734/138																									
24	Silivri	Balaban	756/189																	0	0	0	X					X
		Sancaktepe	206/3																									
25	Silivri	Sancaktepe	131/3				X (86)													1	0	1	X					X
			131/4																									
		Balaban	756/176																									
26	Silivri	Balaban	732/124								X (70)									1	0	1	X					X
			732/148																									
			732/108																									
			732/107																									
			732/125																									
			732/106																									
			732/155																									
27	Silivri	Balaban	734/181																	0	0	0	X					X
			734/129																									
			732/18																									
			732/29																									
			732/30																									
			732/91																									
		Sancaktepe	232/22																									
28	Silivri	Sancaktepe	131/36																	0	0	0	X					X
		Balaban	732/16																									
			732/121																									
29	Silivri	Balaban	734/113																	1	1	0	X					X
			732/27																									
			732/25																									
			732/117																									
			732/111																									
			732/110																									
			732/127																									
			732/129			X (85)						X (85)																
			732/128																									
			732/147																									
			732/88																									
			732/89																									
			732/90																									
			732/24																									
			732/26																									
			734/19																									

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
30	Silivri	Balaban	734/124 734/125 734/126 734/127 732/57 732/77 732/162 734/153																	0	0	0	X	X				X
31	Silivri	Balaban	734/17 732/83 732/81 732/82 732/94 732/73 732/95 732/97 732/96																	0	0	0	X					X
32	Silivri	Balaban Sancaktepe	732/155 232/7																	0	0	0	X					X
33	Silivri	Balaban Sancaktepe	756/201 756/188 243/6																	0	0	0	X					X
34	Silivri	Balaban Gümüşyaka	756/243 756/244 756/78 734/130 756/204 756/197 7859/9																	0	0	0	X					X
35	Silivri	Balaban	756/285 756/198 756/1																	0	0	0	X					X
36	Silivri	Balaban	734/18				X (76)			X (69)	X (76)									2	1	1	X					
37	Silivri	Balaban	756/184								X (52)									1	0	1	X					
38	Silivri	Balaban	734/102								X (70)									1	0	1	X					
39	Silivri	Alipaşa	8271/2 8271/1					X (72)												1	1	0	X					X
40	Silivri	Alipaşa Çeltik	8276/148 8276/147 172/40								X (62)	X (59)								2	1	1	X					X
41	Silivri	Alipaşa	8270/7	X (91)		X (91)		X (91)												1	1	0	X					
42	Silivri	Alipaşa	8270/3 8271/5 8270/14								X (67)	X (60)								2	1	1	X					X
43	Silivri	Alipaşa	8270/7			X (88)		X (88)		X (55) X (88)										2	2	0	X					
44	Silivri	Alipaşa Yolçatı	8271/3 8271/10 4403/7																	0	0	0	X					X
45	Silivri	Alipaşa	8270/11			X (83)						X (57)								2	2	0	X					
46	Silivri	Sancaktepe Balaban	233/71 233/88 233/89 734/131 756/166 756/180																	0	0	0	X					X
47	Silivri	Sancaktepe	243/21 243/18 243/20																	0	0	0	X					X

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
48	Silivri	Sancaktepe	233/23																	0	0	0	X					X
			243/1																									
			232/6																									
		Balaban	732/112																									
			732/112																									
			756/187																									
			756/187																									
49	Silivri	Sancaktepe	131/21	X																1	1	0	X					X
			232/5																									
50	Silivri	Sancaktepe	232/18																	0	0	0	X					X
			232/15																									
			232/19																									
			232/17																									
			232/15																									
			232/13																									
		Değirmenköy	369/89																									
51	Silivri	Sancaktepe	131/1				X (91)													1	0	1	X					X
			131/44																									
			131/38																									
			131/37																									
52	Silivri	Sancaktepe	131/7																	0	0	0	X	X	X			
53	Silivri	Gümüşyaka	7855/10																	0	0	0	X					X
			7858/15																									
54	Silivri	Gümüşyaka	7857/11																	0	0	0	X					X
			7857/12																									
			7857/13																									
			7854/7																									
55	Silivri	Gümüşyaka	7240/5							X (60)					X (40)					2	1	1	X					
56	Silivri	Gümüşyaka	7257/8																	0	0	0						X
			7240/25																									
57	Çorlu	Sultanköy	116/4																	0	0	0	X					X
		Seymen	114/8																									
58	Çorlu	Sultanköy	116/1																	0	0	0	X					X
			116/3																									
			20/72																									
			20/5																									
	Marmaraereğlisi	Cedit Ali Paşa	354/1																									
59	Çorlu	Türkgücü Şahpaz	0/3657				X (78)													1	0	1	X					X
			0/988																									
			0/620																									
	Marmaraereğlisi	Türkmenli	109/9																									
60	Marmaraereğlisi	Türkmenli	109/13			X(77)	X(77)				X(77)									2	1	1	X					
61	Marmaraereğlisi	Türkmenli	109/12					X (72)				X (72)								1	1	0	X					
62	Çorlu	Şahpaz	0/837																	0	0	0	X					X
			202/43																									
			202/42																									
	Marmaraereğlisi	Yakuplu	202/20																									
63	Çorlu	Şahpaz	0/700							X (63)										1	1	0	X					X
			0/1017																									
64	Çorlu	Şahpaz	0/702							X (61)										1	1	0	X					X
			0/1147																									
65	Çorlu	Şahpaz	0/690							X (65)										1	1	0	X					X
			0/679																									
66	Çorlu	Şahpaz	0/986			X (76)	X (80)													2	1	1	X					X
			0/987																									
67	Çorlu	Şahpaz	0/1047																	0	0	0	X			20%		
68	Çorlu	Şahpaz	0/1142																	0	0	0	X					X
			0/681																									
			0/1144																									
69	Çorlu	Şahpaz	0/1015																	0	0	0	X					X
			196/12																									
			0/1016																									

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
70	Silivri	Balaban	224/9																	0	0	0	X					X
			756/86																									
			756/85																									
		Değirmenköy	371/17																									
			462/71																									
			370/14																									
	Çorlu	Seymen	114/58																									
	Marmaraereğlisi	Cedit Ali Paşa	353/37																									
71	Çorlu	Seymen	104/34							X (54)	X (55)									2	1	1	X					
72	Çorlu	Seymen	105/22																	0	0	0	X					X
			105/25																									
			104/17																									
	Silivri	Gümüşyaka	7857/14																									
73	Çorlu	Seymen	105/48							X (59)										1	1	0	X			27%		X
			54/22																									
			114/73																									
		Şahpaz	0/1037																									
74	Çorlu	Seymen	13/144																	0	0	0	X					X
			116/2																									
			54/32																									
			13/145																									
75	Çorlu	Seymen	13/3			X (77)	X (75)													2	1	1	X	X				X
			13/4																									
76	Çorlu	Seymen	114/96																	0	0	0	X					X
			114/97																									
			114/83																									
			114/81																									
			114/80																									
77	Çorlu	Seymen	13/9							X (57)										1	1	0	X					
78	Silivri	Değirmenköy	368/144																	0	0	0	X	X				X
			367/435																									
			369/84																									
			369/83																									
			370/23																									
		Gümüşyaka	7857/16																									
79	Silivri	Değirmenköy	370/43							X (37)										1	1	0	X					
80	Silivri	Değirmenköy	462/62																	0	0	0	X					X
			370/21																									
81	Silivri	Değirmenköy	370/21																	0	0	0	X					X
			370/22																									
			462/76																									
			462/53																									
		Balaban	756/183																									
82	Silivri	Değirmenköy	370/54															X(30)		3	3	0	X					
																		X (28)										
																		X(22)										
83	Silivri	Değirmenköy	369/79								X (59)				X (59)					1	0	1	X					
84	Silivri	Değirmenköy	371/15				X (83)		X (83)		X (28)									2	0	2	X					
85	Silivri	Değirmenköy	370/63	X																1	1	0	X					
86	Silivri	Değirmenköy	463/79																	0	0	0	X					X
			312/12																									
			312/11																									
			463/88																									
			463/81																									
87	Silivri	Değirmenköy	312/14																	0	0	0	X					X
			369/76																									
			369/74																									
			369/68																									
			370/25																									

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				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
			370/56																										
			312/13																										
88	Silivri	Değirmenköy	462/68				X (78)			X (44)				X (44)						2	1	1	X	X				
89	Silivri	Değirmenköy	463/82																	0	0	0	X	X				
90	Silivri	Değirmenköy	370/50																	0	0	0	X					X
			370/10																										
			370/11																										
			369/102																										
91	Silivri	Değirmenköy	370/17							X (63)	X (64)		X (64)							2	1	1	X					X
			369/101																										
92	Silivri	Değirmenköy	463/76																	0	0	0	X					X
			370/52																										
			370/51																										
			462/66																										
93	Silivri	Değirmenköy	370/66									X (51)								1	1	0	X					
94	Silivri	Değirmenköy	369/77			X (78)	X (80)			X (80)										2	1	1	X					
95	Silivri	Değirmenköy	463/84																	0	0	0	X	X				
			463/85																										
96	Silivri	Değirmenköy	370/20				X (76)													1	0	1	X	X		62%		X
			370/49																										
			370/19																										
97	Silivri	Değirmenköy	370/62																	0	0	0	X					X
			462/78																										
			371/14																										
			462/45																										
98	Marmaraereğlisi	Çeşmeli	184/4																	0	0	0	X					X
			175/39																										
			184/1																										
			185/14																										
99	Marmaraereğlisi	Çeşmeli	185/20																	0	0	0	X					X
			184/3																										
		Türkmenli	121/1																										
100	Marmaraereğlisi	Çeşmeli	184/5																	0	0	0	X			X	X	
101	Marmaraereğlisi	Çeşmeli	177/5																	0	0	0	X	X				
102	Marmaraereğlisi	Çeşmeli	184/6				X (76)				X (76)									1	0	1	X					X
			185/22																										
103	Marmaraereğlisi	Yakuplu	196/13																	0	0	0	X					X
			196/15																										
104	Marmaraereğlisi	Yakuplu	207/161																	0	0	0	X					X
			202/38																										
105	Marmaraereğlisi	Yakuplu	195/45																	0	0	0	X					X
			207/74																										
			207/153																										
			195/47																										
			195/44																										
			195/45																										
	Çorlu	Seymen	10/1																										
106	Marmaraereğlisi	Yakuplu	207/70																	0	0	0	X					X
			202/44																										
			250/152																										
			201/2																										
			202/60																										
			195/46																										
			202/47																										
			202/48																										
			202/39																										
			202/19																										
			202/18																										
			202/21																										
			202/17																										
			207/77																										

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				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
			207/71																									
			207/64																									
			207/57																									
			207/32																									
			207/56																									
			207/55																									
			207/37																									
			207/45																									
	Çorlu	Seymen	13/2																									
			143/4																									
107	Marmaraereğlisi	Yakuplu	207/179				X (77)													1	0	1	X					X
			207/149																									
108	Marmaraereğlisi	Yakuplu	206/1			X (81)		X (81)						X (81)						1	1	0	X					
109	Marmaraereğlisi	Yakuplu	195/29			X (79)														1	1	0	X					X
	Marmaraereğlisi	Sultanköy	116/7																									
110	Marmaraereğlisi	Yakuplu	207/65							X (67)	X (68)									2	1	1	X	X				
111	Marmaraereğlisi	Yakuplu	207/201																	0	0	0	X	X				
112	Marmaraereğlisi	Yakuplu	207/61																	0	0	0	X					X
			207/142																									
			207/147																									
113	Marmaraereğlisi	Yakuplu	202/61							X (48)	X (52)									2	1	1	X					X
			207/57																									
114	Marmaraereğlisi	Yakuplu	207/62																	0	0	0	X	X				X
			202/52																									
115	Marmaraereğlisi	Yakuplu	200/1																	0	0	0	X					X
			207/11																									
			202/51																									
116	Marmaraereğlisi	Yakuplu	206/4																	0	0	0	X					X
			207/176																									
		Çeşmeli	185/21																									
117	Marmaraereğlisi	Yakuplu	207/44																	0	0	0	X	X				X
			207/160																									
118	Marmaraereğlisi	Yakuplu	202/53																	0	0	0	X					X
			195/30																									
			207/12																									
			202/35																									
119	Marmaraereğlisi	Yakuplu	207/72																	0	0	0	X					X
			207/73																									
120	Marmaraereğlisi	Yakuplu	196/11																	0	0	0	X					X
			207/43																									
121	Marmaraereğlisi	Yakuplu	207/154									X (48)								1	1	0	X					
122			207/143																									
			207/79							X (56)																		
			196/14																									
	Marmaraereğlisi	Yakuplu	196/16																	2	2	0	X					X
										X (61)																		
123	Marmaraereğlisi	Yakuplu	207/70																	0	0	0	X					X
	Çorlu	Şahpaz	0/706																									
124	Süleymanpaşa	Zafer	345/14							X (50)	X (57)									2	1	1	X					
125	Süleymanpaşa	Kayı	0/727							X (65)										1	1	0	X					X
			0/1593																									
126	Süleymanpaşa	Kayı	0/1557																	0	0	0	X					X
			0/725																									
			0/782																									
127	Süleymanpaşa	Kayı	0/762																	0	0	0	X					X
			0/767																									
128	Süleymanpaşa	Zafer	345/42				X (83)													1	0	1	X					X
			345/43																									
129	Süleymanpaşa	Zafer	345/37				X (78)													1	0	1	X			20%		

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				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
130	Süleymanpaşa	Zafer	345/64 345/66				X (75)													1	0	1	X					X
131	Süleymanpaşa	Zafer	344/258 344/232 344/230																	0	0	0	X					X
132	Süleymanpaşa	Zafer	345/65							X (66)	X (73)									2	1	1	X					
133	Malkara	Ahievren	0/356 0/336				X (82)													1	0	1	X					X
134	Malkara	Ahievren	0/363																	0	0	0	X				X	
135	Malkara	Ahievren	0/335 0/345 0/1289																	0	0	0	X					X
136	Malkara	Ahievren	0/1294																	0	0	0	X				X	
137	Malkara	Ahievren	0/352 0/1298 0/1207 0/1206				X (87)		X (87)		X (87)									1	0	1	X				X	X
138	Malkara	Ahievren	0/306	X (75)		X (75)														1	1	0	X					
139	Süleymanpaşa	Akçahalil	102/35 154/15 102/34 102/27																	0	0	0	X					X
140	Süleymanpaşa	Akçahalil	108/37									X (56)								1	1	0	X			22%		
141	Süleymanpaşa	Akçahalil	106/29 106/31 106/23																	0	0	0	X					X
142	Süleymanpaşa	Akçahalil	108/10																	0	0	0	X	X		28%		
143	Süleymanpaşa	Akçahalil	106/58 106/59			X (92)		X (92)												1	1	0	X					X
144	Süleymanpaşa	Akçahalil	108/15 108/30																	0	0	0	X					X
145	Süleymanpaşa	Akçahalil	102/72 102/73																	0	0	0	X			23%		X
146	Süleymanpaşa	Akçahalil	108/36 102/58 102/57 108/35																	0	0	0	X					X
147	Süleymanpaşa	Kınıklar	109/23 109/24				X (91)													1	0	1	X			20%		X
148	Malkara	Yenice	116/2 116/3				X (75)													1	0	1	X					X
149	Malkara	Yenice	120/3 149/6 124/2																	0	0	0	X					X
150	Malkara	Yenice Hereke	125/7 135/12 133/4 125/23 125/8 124/1 0/410				X (75)													1	0	1	X					X
151	Malkara	Yenice	134/1 129/19 125/19				X (75)													1	0	1	X					X
152	Malkara	Yenice	129/23																	0	0	0	X	X		29%		
153	Süleymanpaşa	Nusratfaki	118/5			X (90)									X (59)					2	1	1	X					X
154	Süleymanpaşa	Nusratfaki	118/9								X (70)									1	0	1	X					
155	Süleymanpaşa	Nusratfaki	107/23			X (75)														1	1	0	X	X				
156	Süleymanpaşa	Nusratfaki	107/47 107/25																	0	0	0	X					X

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				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
			107/24																									
			107/46																									
157	Süleymanpaşa	Nusratfaki	106/6			X (83)														1	1	0	X					X
			113/46																									
			113/49																									
			113/47																									
			113/48																									
			118/51																									
			107/52																									
			107/51																									
			107/50																									
158	Süleymanpaşa	Nusratfaki	118/53				X (76)													1	0	1	X					X
			118/52																									
			118/54																									
			107/49																									
159	Süleymanpaşa	İnecik	161/18			X (76)														1	1	0	X					X
			195/6																									
			205/117																									
160	Süleymanpaşa	İnecik	205/104																	0	0	0	X					X
			205/98																									
161	Süleymanpaşa	Nusratfaki	118/21			X (76)				X (76)										1	1	0	X					X
			118/23																									
162	Süleymanpaşa	İnecik	205/122							X (63)	X (64)									2	1	1	X					X
			205/125																									
			195/7																									
			205/124																									
			160/14																									
163	Süleymanpaşa	İnecik	160/134																	0	0	0	X	X		22%		X
			160/138																									
164	Süleymanpaşa	İnecik	161/19	X (51)						X (51)										1	1	0	X	X		53%		X
165	Süleymanpaşa	İnecik	205/100																	0	0	0	X					X
			205/109																									
166	Süleymanpaşa	İnecik	198/55																	0	0	0	X					X
			198/50																									
167	Süleymanpaşa	İnecik	160/22							X (69)						X (69)				1	1	0	X					X
			160/21																									
			160/20																									
			160/23																									
168	Süleymanpaşa	İnecik	160/11			X (76)	X (76)													2	1	1	X	X		65%		
169	Süleymanpaşa	İnecik	205/92																X (25)	1	0	1	X					
170	Süleymanpaşa	İnecik	205/95																X (38)	1	0	1	X					X
			198/49																									
171	Süleymanpaşa	İnecik	156/38																X (29)	1	0	1	X			66%		X
			156/22																									
			156/37																									
172	Süleymanpaşa	İnecik	160/132								X (64)									1	0	1	X					X
			160/137																									
173	Süleymanpaşa	İnecik	205/110																	0	0	0	X					X
			198/44																									
			160/129																									
			205/107																									
174	Süleymanpaşa	Seymenli	107/12																	0	0	0	X					X
			107/10																									
175	Süleymanpaşa	Seymenli	108/4																	0	0	0	X					X
			108/1																									
			108/2																									
			108/3																									
			108/5																									
176	Süleymanpaşa	Seymenli	107/71															X (33)		1	1	0	X					X
			107/47																									
			107/46																									

No	District	Settlement	Parcel No	Individual Vulnerability																Number of different vulnerable individuals within the HH			Vulnerability of HH					
				Gender		Advance Old Age (over 75)		Elderly (over 65) in need of care		Chronic Disease (Heart, Diabetis, Blood Pressure, Kidney..)		Other Singificant Health Issues (Cancer, ….)		Physical Disability		Mental Disability/ Issues		Unemployed (Although looking for a job)					Economically Displaced HH	Landless HH	Low Income HH (lower than applicable monthly minimum wage in Türkiye)	HH significantly affected by the Project (Households who lose more than 20 percent of their total productive area	HH significantly affected by expropriation of other past projects	Number of parcels affected by the Project (Multiple)
				Women head of household	Single men taking care of children	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Total	Female	Male						
177	Süleymanpaşa	Seymenli	113/166 107/38																	0	0	0	X					X
178	Süleymanpaşa	Seymenli	136/12 107/43 136/5 107/60																	0	0	0	X					X
179	Süleymanpaşa	Seymenli	113/77		X (47)					X (68)	X (47)									2	1	1	X					
180	Süleymanpaşa	Seymenli	107/45 107/44																	0	0	0	X					X
181	Süleymanpaşa	Seymenli	136/4								X (74)									1	0	1	X					
182	Süleymanpaşa	Güveçli	109/43 113/81 111/1																	0	0	0	X					X
183	Süleymanpaşa	Güveçli	112/4							X (53)	X (34)									2	1	1	X					
184	Süleymanpaşa	Güveçli	109/56 109/45 109/35 112/6 109/69																	0	0	0	X					X
185	Süleymanpaşa	Güveçli	109/68 109/60 109/54																	0	0	0	X			25%		X
186	Süleymanpaşa	Güveçli	109/66 111/1								X (52)									1	0	1	X					X
		Seymenli	113/75																									
187	Süleymanpaşa	Güveçli	113/20						X (74)		X (74)									1	0	1	X			28%		
188	Süleymanpaşa	Güveçli	109/42 120/18 109/55 109/44								X (66)									1	0	1	X					X
189	Süleymanpaşa	Güveçli	113/18 107/69								X (51)									1	0	1	X					X
		Nusratfaki	0/707 0/708																									
		Nusratlı	0/1327																									
190	Süleymanpaşa	Güveçli	113/13 120/17 109/31								X (72)									1	0	1	X					X
191	Süleymanpaşa	İnecik	205/140 161/17			X (78)	X (86)													2	1	1	X					X
192	Süleymanpaşa	İnecik	161/14 205/137																	0	0	0	X					X
193	Süleymanpaşa	İnecik	205/101			X (88)		X (88)												1	1	0	X					X
194	Süleymanpaşa	İnecik	198/25				X (80)													1	0	1	X			21%		
195	Süleymanpaşa	Nusratlı	0/1102 0/1103								X (49)									1	0	1	X					X
196	Malkara	Hereke	0/1124 0/409								X (57)									1	0	1	X			30%		X
197	Malkara	Hereke	0/518																X (27)	1	0	1	X					
198	Malkara	Hereke	0/519				X (76)			X (62)	X (76)									2	1	1	X			29%		
199	Malkara	Hereke	0/407							X (59)	X (61)									2	1	1	X					