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ILBANK

**FRIT II– IMPROVING MUNICIPAL SERVICES IN REFUGEE AFFECTED
AREAS IN TURKEY (P169996)**

Resettlement Framework (RF)

February 2020

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Abbreviations

ASKİ	General Directorate of Adana Water and Wastewater Utility
BOD	Biological Oxygen Demand
CLO	Community Liaison Officer
DMA	District Metering Areas
DSI	State Hydraulic Works
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	The World Bank Environmental and Social Standard
EU	European Union
FI	Financial Intermediary
FRIT	Facilities for Refugees in Turkey
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IBRD	International Bank for Reconstruction and Development
ILBANK	İller Bankası A.Ş.
KASKI	General Directorate of Kahramanmaraş Water and Wastewater Utility
KASKI	General Directorate of Kayseri Water and Wastewater Utility
KOSKI	Konya Water and Wastewater Utility
MM	Metropolitan Municipality
MoEU	Ministry of Environment and Urbanization
MSP	Municipal Services Project
NRW	Non-Revenue Water
PAP	Project Affected Parties
PIU	Project Implementation Unit
PMU	Project Management Unit
RF	Resettlement Framework
RP	Resettlement Plan
SCADA	Supervisory Control and Data Acquisition
SCP	Sustainable Cities Projects
WB	World Bank
WWTP	Waste Water Treatment Plant

1. Introduction

1.1. Background of the Project

Following the protracted political crisis across in Syria, Turkey has become the largest refugee hosting country, serving as a transit hub and a reception country for irregular migrants and refugees from the region.¹ With almost 3.9 million refugees, more than 3.6 million are registered Syrian refugees under temporary protection. Only a small share (approximately 10 percent) resides in camps, while the rest (90 percent) live outside camps, mostly in urban areas. Municipalities are among the primary responders in addressing the impact of the Syria crisis, and they have played an essential part in the development of more resilient capacities able to respond to the increase in demand for services.² The refugee crisis has resulted in a substantial increase in the population of many municipalities across Turkey, especially in the South Eastern region as well as a number of other provinces across the country.

The provinces of Adana, Kahramanmaraş, Kayseri, Konya and Osmaniye are among several provinces in Turkey impacted by the influx of refugees. In 2018, these five cities had a refugee population of about 500,000 people. The increased populations have put significant pressure on existing municipal infrastructure including water supply, wastewater and solid waste management services in affected host communities. As a result, urgent interventions in municipal infrastructure to augment existing systems are required. Facilities for Refugees in Turkey (FRIT-II) Municipal Project directly aims municipal services priorities, particularly construction and rehabilitation of water supply, wastewater and solid waste facilities in targeted five provinces (Adana, Kahramanmaraş, Kayseri, Konya and Osmaniye) affected by the Syrian refugees in Turkey.

The main borrower and implementing agency of the Project is ILBANK which will act as the Financial Intermediary (FI) to transfer funds to participating municipalities or utilities in the selected 5 provinces. ILBANK will establish a Project Management Unit (PMU) for the operation of the Project at central level. Participating municipalities/utilities will be responsible for sub-project investment implementation and will set up municipal project implementation units (PIUs) at local level to ensure effective sub-project implementation. Depending on the subprojects the borrowers may be metropolitan or provincial municipalities or utilities. Utilities are public entities that are affiliated with a metropolitan municipality and have an autonomous budget. Both municipalities (metropolitan and provincial) and utilities, by law, can serve as the designated authority for land acquisition.

The detailed designs of the investments are not ready at this stage. However, given the nature of this project, some of the proposed municipal investments in the selected 5 provinces will require certain private lands to be acquired for the construction envisioned under the project. ILBANK prepared this RF to serve as a guidance document in the preparation of site (subproject) specific Resettlement Plans (RPs). In addition, when detailed designs become available Ex-post Social Audits (format provided in Annex 3) will also be prepared for relevant land acquisition activities that already took place.

¹ According to DGMM and UNHCR, as of December 2018 there are 3.9 million refugees in Turkey. This total includes Syrians (3.6 million), Afghan (170,000), Iraqis (142,000), Iranians (39,000), Somalis (5,700), and other nationalities (11,700).

² Source: Strengthening Municipal Resilience in Response to the Impact of the Syria Crisis in Turkey, 3RP

1.2. Objective and Scope of the RF

The purpose of preparing this Resettlement Framework (RF) is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components to be prepared during project implementation.

This RF clarifies resettlement principles to be applied during implementation and the organizational arrangements for preparing RPs for each of the subprojects. The RF lays out the principles for resettlement and the institutional arrangements for the municipalities/utilities to prepare Resettlement Plans (RP) for the subprojects. The RF also includes arrangements for ILBANK to supervise RP preparation and implementation and to ensure consistency with ESS5.

The procedures presented in this RF detail the actions, which will be taken to ensure the compliance with Turkish Legislation and Procedures (Turkish Legislation listed below) and the World Bank (WB) Environmental and Social Framework (ESF) that entered into force in October 2018 and replaced the Bank’s Safeguards. The ESF protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development.

The new ESF enables the WB and ILBANK and/or implementing municipalities/utilities to better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks and makes important advances in areas such as transparency, non-discrimination, public participation, and accountability including expanded roles for grievance mechanisms.

In line with this perspective, ESF’s ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement) recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition³ or restrictions on land use⁴ may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood)⁵ or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

³ “Land acquisition” refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. “Land” includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.

⁴ “Restrictions on land use” refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.

⁵ “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.

Experience and research indicate that physical and economic displacement, if unmitigated, may give rise to severe economic, social and environmental risks: production systems may be dismantled; people face impoverishment if their productive resources or other income sources are lost; people may be relocated to environments where their productive skills are less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost. For these reasons, involuntary resettlement should be avoided.⁶ Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

According to ESS5, once the sub-project individual project components are defined and the necessary information becomes available, this framework will be expanded into a sub-project specific Resettlement Plan proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the World Bank.

Therefore, this RF, was prepared to address the potential land based social risks and impacts identified in the environmental and social assessment, particularly with regard to the proposed sub-projects' land take requirements. RPs that will be prepared for sub-project specific land acquisition issues will use this RF as a guidance and:

- (a) For projects with minor land acquisition or restrictions on land use, as a result of which there will be no significant impact on incomes or livelihoods, sub-project specific RPs will establish eligibility criteria for affected persons, set out procedures and standards for compensation, and incorporate arrangements for consultations, monitoring and addressing grievances;
- (b) For projects causing physical displacement, the plan will set out the additional measures relevant to relocation of affected persons;
- (c) For projects involving economic displacement with significant impacts on livelihoods or income generation, the plan will set out the additional measures relating to livelihood improvement or restoration; and
- (d) For projects that may impose changes in land use that restrict access to resources in legally designated parks or protected areas or other common property resources on which local people may depend for livelihood purposes, the plan will establish a participatory process for determining appropriate restrictions on use and set out the mitigation measures to address adverse impacts on livelihoods that may result from such restrictions.

⁶ Avoidance is the preferred approach in accordance with the mitigation hierarchy in ESS1. It is especially important to avoid physical or economic displacement of those socially or economically vulnerable to hardship as a result. However, avoidance may not be the preferred approach in situations where public health or safety would be adversely affected as a result. There may also be situations where resettlement can provide direct development opportunities for households or communities, including improved housing and public health conditions, strengthened security of tenure or other improvements to local living standards.

A RP is required for any land acquisition and/or resettlement from private individuals or private commercial entities carried out by a municipality/utility after the RF has been approved. This is regardless of when the corresponding sub-loan/sub-financing agreement is signed. The plan will be submitted to ILBANK for initial review and clearance. After being cleared by ILBANK, the plans will be submitted for WB review and approval. The sub-borrower Municipality/ Utility is responsible for the implementation of the plan; ILBANK is responsible for the supervision of the implementation of the plan; and the WB will ensure compliance in implementation through selective supervision. The plan should be completed, disclosed and implemented before the construction starts on the site. The outline of RP is given in Annex 1. If the Municipality/Utility has acquired lands only from public institutions, again the subject land will need to be assessed for any formal or informal land use before the sub-project is considered not have any land-based impacts and exempt from the application of ESS5. In cases, where there are no users on public lands acquired from public institutions, the municipality/utility will be responsible to reflect the land acquisition procedures (transfers, permits etc.) from the relevant public entity in a semi-annual Monitoring/Progress Report by using the format provided in Annex 2 of this RF. However, if the evaluation concludes there is use of public land by users (both formal or informal), the municipality/utility will be responsible of preparing a RP to address measures for land based livelihood losses of the land users.

ESS5 also applies if land was acquired in anticipation of or in preparation for a project and the land is directly linked to the WB project. If land acquisition procedures were completed at the time this RF is approved, a retroactive audit report (Ex-Post Social Audit Reporting format is given in Annex 3) will be prepared by the municipality/utility and submitted to ILBANK to be submitted to the WB to ensure that land acquisition was completed in accordance with the objectives and principles of ESS5. Should an Ex-Post Social Audit Report reveal that a sub-project is non-compliant with ESS5, the borrowing municipality/utility will take necessary actions defined under this RF to ensure that all land acquisition works are scaled up and gaps are bridged, mitigating or compensating for impacts generated by the sub project(s).

All land acquisition and resettlement activities under the Project of ‘Improving Municipal Services in Refugee Affected Areas in Turkey’ will be subject to the terms and provisions of the RF. Prior to appraisal of the project, the Municipalities/Utilities will inform potentially affected persons and other relevant stakeholders through dissemination of the RF online and through holding public consultations as described in this RF.

Dissemination activities will be implemented through well-targeted mechanisms including one of the following:

(a) online channels (project website and/or webpages of municipalities) where project information and project outcomes are displayed; (b) social media channels of municipalities (c) printed dissemination materials (posters, brochures, infographics etc.) that will illustrate where/why/how the project interventions take place. The information materials will be disseminated through information desks of municipalities, sewerage facilities and local governing bodies. (d) public information meetings that will provide timely, relevant and life-enhancing information about the work to be carried out under the project and address land acquisition risks while specifying vulnerabilities if any. (e) human-interest videos and photo stories disseminated through social media, news releases and project website/webpage. The stories will promote project’s impact on

the environment (decreased water loss, quality discharged water, closure of existing dumpsites, increased energy efficiency, reduced non-revenue water...) and people's everyday lives (access to water via increased water reservoir capacities) as a result of services provided to overall population (Turkish citizens and refugees). Through the stories disseminated in the photo, video, infographic, brochure, web story and press release format, it would be possible to disseminate project's impact and contribution to sustainability and energy efficiency to other municipalities.

1.3. Project Description

In the past five years Turkey has become one of the world's largest refugee hosting countries because of the Syrian influx. As of December 2018, there were over 3.6 million registered Syrian refugees residing in the country. The provinces of Adana, Kahramanmaraş, Osmaniye, Kayseri and Konya are among provinces in Turkey impacted by refugee influx. In 2018, four provinces, namely Adana, Kahramanmaraş, Osmaniye and Kayseri, out of above mentioned five provinces had a refugee population of about 500,000 people (Table 1) in 2018. The refugee population in the provinces to be financed under this project: Adana, Kahramanmaraş, Kayseri, Konya and Osmaniye range from about 4 to over 10 percent of the host populations (Table 1).

Table 1: Top 10 provinces most impacted by refugee influx (according to total refugee population)⁷

	Province	2018			2016		
		Refugee Pop.	Host Pop.	Refugee to host %	Refugee Pop.	Host Pop.	Refugee to host %
1	Kilis	130,405	136,319	95,7	129,221	130,655	98,9
2	Hatay	443,760	1,575,226	28,2	386,090	1,533,507	25,2
3	Sanliurfa	474,531	1,985,758	23,9	401,084	1,892,320	21,2
4	Gaziantep	382,604	2,005,515	19,1	325,151	1,931,836	16,8
5	Mardin	92,394	809,719	11,4	97,768	796,591	12,3
6	Mersin	208,338	1,793,931	11,6	138,634	1,745,221	8,0
7	Osmaniye	54,175	527,724	10,3	39,975	512,873	7,8
8	Adana	204,200	2,216,475	9,2	150,117	2,183,167	6,9
9	Kahramanmaras	100,403	1,127,623	8,9	84,103	1,096,610	7,7
10	Kayseri	74,612	1,376,722	5,4	49,024	1,341,056	3,7

The increased populations have put significant pressure on existing municipal infrastructure including water supply, wastewater, and solid waste management services in affected host communities. As a result, urgent interventions in municipal infrastructure to increase existing systems are required. The proposed activities directly address municipal services priorities, particularly construction and rehabilitation of water supply, wastewater and solid waste facilities in targeted provinces affected by the Syrian refugees in Turkey.

The IBRD loan and EU FRIT grant will co-finance the project, but each will finance separate individually identifiable activities. The grant would in this respect leverage the additional loan resources through the co-financing to allow for maximized coverage of investments in affected municipalities given the magnitude of needs and the limited available grant resources.

⁷ Source: European Commission, October 2018. Technical Assistance to the EU Facility for Refugees in Turkey – Final Report

In this context, under FRIT-II, because of having professional experience in the field of municipal infrastructure sector more than a decade with the ability of project management with IFIs, ILBANK was assigned as the implementing agency of the project. ILBANK and The WB agreed to proceed with the financing of the project ‘Improving Municipal Services in Refugee Affected Areas in Turkey’ to improve municipal infrastructure in municipalities/utilities affected by the Syrian refugee influx in Turkey.

The project will seek to achieve the following results, in line with the project development objectives:

- (a) Improved access to safely managed water supply services;
- (b) Reduction in non-revenue water;
- (c) Improved access to safely managed wastewater collection / sewerage services;
- (d) Improved wastewater treatment;
- (e) Improved solid waste disposal in targeted municipalities; and
- (f) Strengthened institutional capacity to manage municipal services in municipalities and utilities.

1.4. Project Components

The project would finance construction and rehabilitation works for water, sanitation and solid waste facilities to address the urgent needs in the affected municipalities. The proposed approach also covers independent supervision for the review of designs and construction/rehabilitation works. Targeted capacity building activities are also proposed to increase capacity within municipalities and utilities to operate and maintain the respective facilities to ensure sustainable service delivery to the entire population.

Proposed activities will include:

- (g) Construction and/or rehabilitation of water supply infrastructure;
- (h) Construction and/or rehabilitation of wastewater systems;
- (i) Construction of solid waste landfill;
- (j) Supervision of construction and/or rehabilitation works in (a), (b) and (c), and installation of equipment; and
- (k) Provision of technical assistance for project management, supervision and capacity building to ILBANK's Project Management Unit (PMU) and Municipalities/utilities (PIU's).

The project will have two components:

Component 1 – Environmental Infrastructure Investments: This component will finance the construction and rehabilitation works for water supply, sanitation and solid waste management facilities in the five municipalities, to achieve improvements in access, service quality and

continuity of services. Water supply investments will include, but not be limited to construction and/or rehabilitation of water treatment plants, rehabilitation or extension of water distribution networks and transmission lines, expansion of water reservoir capacities, NRW reduction activities such as installation of SCADA systems and development of district metering areas (DMAs), and targeted interventions at the household level, where appropriate, to ensure that all customers have access to safe water supply. Wastewater investments will include construction of new wastewater treatment plants (WWTPs) or increase their capacity, and construction of new or extension of existing sewerage collection networks. Solid waste facilities will include construction of a new waste landfill in one municipality, closing of existing dumpsites, and provision of waste collection and transfer equipment.

Component 2 - Technical Assistance for Project Management and Supervision, Capacity Building, Communication and Citizen Engagement: This component will finance goods and consultancy services for project management, consultancy services for design review and supervision of municipal infrastructure investments, citizen engagement, public communication and visibility activities, and institutional capacity building activities targeting the participating municipalities, utilities and Iler Bank. Targeted capacity building activities are also proposed to increase capacity within municipalities and utilities to operate and maintain the respective facilities to ensure sustainable service delivery to the entire population.

Brief description of subprojects and their environmental and social (E&S) assessment requirements are given in the Table 2.

Table 2. Brief Description of Subprojects and Reporting Requirements

Component	No	Activity Name and Scope	Expected land acquisition per ESS5	Requirement (RP or Ex-Post Social Audit)
Sub-Comp.1: Adana	1-1	Kozan Imamoglu Yedigoze Drinking Water Transmission Line - 35.4 km transmission line to Kozan (Ø700 mm-Ø1,400 mm ductile iron pipes) with auxiliary structures (washout and air relief valve chambers, etc.)	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.	None
	1-2	Yedigoze Water Treatment Plant - Water treatment plant construction with capacity 115,776 m ³ /day (1,340 l/s)	Land is registered to ASKI and was acquired over a year ago.	Ex-Post Social Audit required prior to the start of civil works.
	1-3	Kozan Pinargozu Drinking Water Transmission Line and Network - 310 km Water distribution network including gravity and renewal of existing transmission line with 28.12 km Ø300 mm pipe - 8 Pumping stations, water reservoirs (4 new), 2 collection tanks and auxiliary structures constructed and are rehabilitated	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.	None

Sub-Comp.2: Kahramanmaraş	2-1	<p>Kahramanmaraş Northern Districts Integrated Solid Waste Project</p> <ul style="list-style-type: none"> - New landfill will be constructed in Afsin with a composting plant (410 tons/day) and a mechanical separation facility (757 tons/day) in landfill site. 2 transfer stations in Elbistan and Goksun will be in place. - Waste collection equipment (container and pick-up trucks) is provided - Rehabilitation of the 24 existing dumpsites. - Rehabilitation of 22 wild dumpsites (mainly of former small towns) will be done mainly by transferring dumped wastes to the new landfill site and 2 wild dumpsites (Afsin and Elbistan) will be rehabilitated on site. 	<p>Expected land acquisition for project activities.</p> <p>In addition, previous history of minor land acquisition by Union of Municipalities. Kahramanmaraş Municipality (as the main sub-borrower) is expected to transfer land title ownership.</p>	<p>Resettlement Plan is required for all project activities requiring land acquisition.</p> <p>Ex-Post Social Audit required prior to the start of civil works.</p>
	2-2	<p>Kahramanmaraş (Centrum) Drinking Water Project</p> <ul style="list-style-type: none"> - Rehabilitation and construction works in water distribution network including: - Pressure zones, DMAs established, SCADA systems introduced, and flow meters and pressure reduce valves are installed - Rehabilitation of Water reservoirs and pumping stations - Construction of a New water reservoir 	<p>Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.</p> <p>Previous history of land acquisition for water reservoirs.</p>	<p>Ex-Post Social Audit required prior to the start of civil works.</p>
	2-3	<p>Kahramanmaraş (Centrum) Sewerage Project</p> <ul style="list-style-type: none"> - Rehabilitation and construction works of sewerage network (400 km) - Construction of storm water network (100 km) 	<p>Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.</p>	<p>None</p>
	2-4	<p>Ceyhan Basin Wastewater Treatment Plants</p> <p>Construction of 4 WWTPs including collector lines:</p> <ul style="list-style-type: none"> - Ekinozu WWTP and Collectors: 0.95 km of Ø400 concrete pipes, 1.1 km of Ø200 concrete pipes, 23 manholes, 1 pumping station, 1 WWTP (for 12,350 people; in 2037 capacity 889 m³/day, 14,750 people in 2052 capacity 1,062 m³/day) - Caglayancerit WWTP: 1 WWTP (for 15,000 people; in 2038 capacity 1,650 m³/day, 17,600 people in 2053 capacity 1,936 m³/day) - Andirin WWTP and Collectors: 4.23 km of Ø400 concrete pipes, 3.51 km of Ø200 concrete pipes, 163 manholes, pumping station and 600 m pressure line (600 m), 1 WWTP (for 11,600 people; in 2037 capacity 	<p>Expected land acquisition for project activities.</p>	<p>Resettlement Plan is required for all WWTP that necessitates land take.</p>

		<p>1,591 m³/day, 15,000 people in 2052 capacity 2,057 m³/day)</p> <ul style="list-style-type: none"> - Goksun WWTP and Collectors: 4,617 km of (Ø600) HDPE Pipes, 107 Manholes, 1 WWTP (for 25,000 people; in 2037 capacity 5,508 m³/day, 30,000 people in 2052 capacity 6,480 m³/day) 		
	2-5	<p>Elbistan Drinking Water Network Project</p> <ul style="list-style-type: none"> - Rehabilitation of water distribution network (255 km) and house connections (4128) - Pressure lines (3 km) - Construction of water reservoirs (6 new) - 5 Pumping stations 	Expected land acquisition for project activities.	Resettlement Plan is required for all project activities requiring involuntary land acquisition. This RP will also include measures to monitor and evaluate associated activities carried out by DSI.
	2-6	<p>Elbistan Drinking Water Transmission Line</p> <ul style="list-style-type: none"> - Construction of water transmission line (120 km) and 6 water reservoirs (volumes b/w 100-2,000 m³) 	<p>Expected land acquisition for project activities.</p> <p>Previous history of land acquisition for completed sub-section of transmission line (section #2).</p>	<p>If land acquisition is commenced by DSI in section 2, prior to Project kick off, an Ex-Post Social Audit will be required to follow up on the implementation of the land acquisition process carried out by DSI.</p>
Sub-comp 3: Kayseri	3-1	<p>Kayseri Wastewater Treatment Plant</p> <ul style="list-style-type: none"> - Existing WWTP (2nd phase) is extended and solar sludge drying facility is installed - Existing WWTP capacity 110,000 m³/day. Increased capacity will be 183,000 m³/day & 1.4 million p.e. 	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.	None
Sub-comp. 4: Konya	4-1	<p>Aksehir Water Supply Project</p> <ul style="list-style-type: none"> - Construction of water transmission lines (29 km) and network pipelines (97 km) including house connections are constructed 	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to	None

		- 3 Water reservoirs (3,000 m ³ , 1,000 m ³ , and 500 m ³) and pressure reducing chambers are constructed	confirm to during implementation.	
	4-2	İlgın Wastewater Treatment Plant	The land based risks/impacts of the sub-project will be identified after review and assessment of feasibility study when available, and once a visit conducted on site	To be defined after field survey
	4-3	Çumra Wastewater Treatment Plant	The land based risks/impacts of the sub-project will be identified after review and assessment of feasibility study when available, and once a visit conducted on site	To be defined after field survey
Sub-comp. 5: Osmaniye	5-1	Osmaniye (Centrum) Drinking Water Project - Construction of Water distribution network (598 km 110-900 mm), 5 water reservoirs, pressure release valves, DMAs and auxiliary structures.	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.	None
	5-2	Osmaniye (Centrum) Sewerage Project - Renewal of Wastewater collection network (403 km)	Land acquisition is not expected at this stage. The works are expected on allocated public lands. ESA studies to confirm to during implementation.	None

Detailed descriptions of the above provided sub-projects, including their land requirements, are described below:

Sub-Project 1: Adana

After the Syrian war Adana became one of the most preferable arrival points for Syrians refugees. Refugee population in Adana mostly includes Syrians and Iraqis majority of whom are living in central districts of Adana. According to Adana Metropolitan Municipality, their population is around 400,000 (official figure is 204, 200), roughly 90 percent located in the city and 10 percent in the camps. This resulted in additional demand for municipal and infrastructural services including water systems.

Majority of the settlements in the region use well water. In drought years and seasons, well yields significantly reduces. In order to solve water deficiency problems in some settlements of Adana, ASKI has initiated a design for Yedigöze Drinking Water Transmission Line and Water Treatment Plant Project. This Project aims to supply water to 141 settlements from Yedigöze Dam Reservoir

which will eliminate well usage in these settlements. 608,060 local population and 65,700 Syrian refugees are expected to benefit from project results.

Sub-projects in Adana cover:

- Kozan Imamoglu Yedigöze Drinking Water Transmission Line (35.4 km transmission line),
- Yedigöze Water Treatment Plant (115,776 m³/day capacity), and
- Kozan Pinargözü Drinking Water Transmission Line and Network (28.12 km transmission line and 310 km network).

A part of Yedigöze Drinking Water Transmission Line is composed of tunnels and construction of the two tunnels will be financed by the Utility ASKI. Tender for the construction of tunnels has already been completed and the construction started since these lands are publicly owned (belonging either to the Municipality or the Treasury) and no expropriation is required.

Currently, drinking water for the districts Imamoglu, Kozan, Ceyhan and Yumurtalik is provided from groundwater wells. Through the Project, Yedigoze Dam will provide drinking water needs of these districts. Additionally, energy costs of the system will decrease significantly as the water from the Dam will be distributed by gravity. In Kozan, existing asbestos pipes will be replaced with ductile iron and HDPE pipes which will lead to significant decrease in water losses.

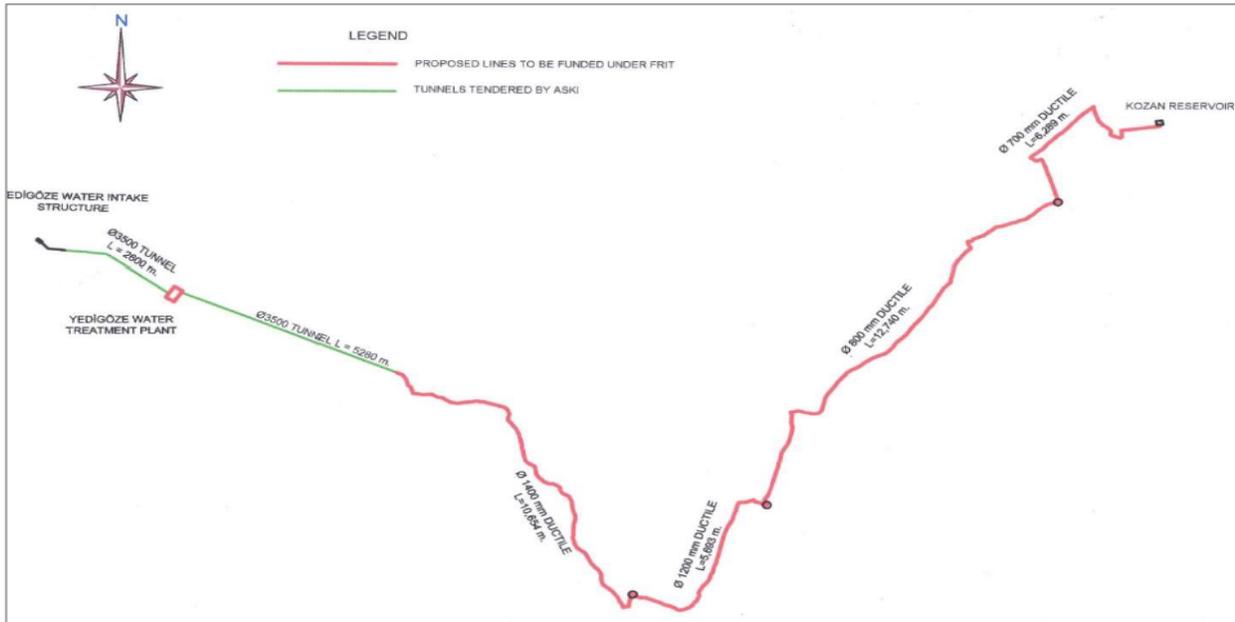


Figure 1. Yedigoze Drinking Water Transmission Line

The preliminary feasibility studies are available for all sub-projects and they have been reviewed by the Bank. The detailed designs for the sub-projects are under development. All the designs will undergo a design review, to be carried out by the project supervision consultants prior to construction as part of due diligence to ensure robustness and responsiveness to aspects such as climate resilience, energy efficiency, etc.

In terms of the land requirements;

- land for the water treatment plant was expropriated one year ago,
- land for transmission lines, distribution network and water reservoirs belong to either the municipality or the Treasury,
- the route of the transmission lines has been selected by also considering the existing roads in order to avoid expropriation, and
- there are not any formal or informal users on the affected public lands.

Since the project area for Yedigoze Wastewater Treatment plant was acquired recently, an Ex Post Social Audit will be prepared to assess compliance with Bank's ESS5, while no additional documentation will be required since the route of water transmission line is on existing roads and there is no need for expropriation.

The project area is at 3rd degree earthquake zone. There are not any known natural and/or cultural protection area at the project sites. ASKI has about 3,500 staff in overall and Drinking Water, Engineering and Supervision Department has 250 staff.

Sub-Project 2: Kahramanmaraş

The sub-projects for Kahramanmaraş focus on investments for water, wastewater and solid waste facilities under the following project titles:

- Kahramanmaraş Northern Districts Integrated Solid Waste Project
- Kahramanmaraş (Centrum) Drinking Water Project
- Kahramanmaraş (Centrum) Sewerage and Storm Water Project
- Elbistan Drinking Water Network Project
- Elbistan Drinking Water Transmission Line
- Ceyhan Basin Wastewater Treatment Plants

Kahramanmaraş is one of the 10 cities in Turkey with the highest Syrian population. In 2018, it has been depicted that there are 117,907 Syrians living in Kahramanmaras province corresponding to a ratio of 9.56% of the Province's own population 1,127,623. The Syrian population in the Province has increased by 78% in the last six years, 2012-2018. Additionally, the distribution of the shares for municipalities from the general budget is based on the population criterion, and the variable population is not considered in this distribution. Therefore, the population that has come with the migration is not considered in the distribution of these shares.

Both Kahramanmaras Municipality and the utility (KASKI) have an existing GRMs which can be utilized during project implementation to manage grievances. KASKI also is well structured at local level through its district branches providing operational and other customer relation services which can also serve well for the implementation, monitoring and community engagement requirements of the proposed subprojects.

Kahramanmaraş Northern Districts Integrated Solid Waste Project

The sub-project is composed of construction of a sanitary landfill (including a mechanical separation facility of 757 tons/day and a composting plant of 410 tons/day), two transfer stations (in Goksun and Elbistan) and rehabilitation of 24 wild dumpsites. Rehabilitation of 22 wild dumpsites (mainly of former small towns) will be done mainly by transferring dumped wastes to the new landfill site and 2 wild dumpsites (Afsin and Elbistan) will be rehabilitated on site.

A leachate treatment plant will also be established however, the discharge of the treated leachate is not clear yet (i.e. two options as (i) discharging to the existing sewage network or (ii) discharging to the seasonal creek within the project site). The treatment sludge will be disposed in the Kahramanmaras Centrum Landfill. Details of environmental issues will be discussed under the ESIA.

The sanitary landfill to be constructed under Kahramanmaras Northern Districts Integrated Solid Waste Project. Land acquisition was undertaken by the Union of Municipalities. Thus, will require an Ex-Post Social Audit to be prepared. Goksun transfer station site is allocated to the Municipalities Union from the Regional Directorate of Forestry, and there will be a process for permission to use of this area. Elbistan transfer station site is within the existing Elbistan dumpsite which is located on Treasury land. Additional land may be acquired thus, a RP will be prepared according to RF and details to land requirements of the project will be discussed in the RP. The sanitary landfill project site has been used as a wild dump area for almost 11 years. Any presence or potential non land-based livelihood impacts on waste-pickers will be further investigated in the ESIA and mitigation measures will be designed accordingly if needed.

Goksun transfer station site is expected to be around 1.8 ha (to be confirmed at the final design stage) and allocated to the Municipalities Union from the Regional Directorate of Forestry. However, there may be a need to establish easement rights on a small section of land for the access road. Land take requirements of Goksun transfer station will be detailed under the RP.

The transfer station in Elbistan is within the existing Elbistan dumpsite which is located on Treasury land, without having any additional need to acquire land. Both wild dumpsites (Afsin and Elbistan) pose a health and safety threat as Afsin dumpsite is openly spread out without any barriers and security, and in 1 km distance to the nearest settlement. Elbistan dumpsite is fenced with need for additional maintenance, however, is located close to the source of the Ceyhan river. Individual waste picking activities, seldomly observed by the waste collecting truck drivers, are stopped immediately by the municipal police, when informed. Any cases where there are waste pickers who collect recyclable wastes from the wild landfill as a source of income will be investigated during ESIA preparation and proper mitigation measures will be presented if need be. Waste is of poor content as the majority is separated at the initial source (dumpsters in the city) leaving very limited recyclable material to collect at the dumpsites.

There is an ongoing awareness raising effort from the Municipality for waste separation at the source, however there are no systematic applications that would be effective on the feasibility study of the sanitary landfill. The design of sanitary landfill and rehabilitation projects of wild dumpsites have been approved by the MoEU and the design of mechanical separation facility is expected to be finalized in the near future.

Kahramanmaraş (Centrum) Drinking Water Project

Project includes rehabilitation and construction works in water distribution network including establishment of pressure zones, DMAs, SCADA system and installation of flow meters and pressure reduce valves. Within the scope of this sub-project, there are 59 water reservoir areas of which 38 are planned to be established by WB financing. For the remaining, some of them will be abandoned or rehabilitated. Currently, varying pressure in the distribution network cause problems and the NRW in city is above 60%.

Regarding Kahramanmaraş Centrum Drinking Water Project, reservoir areas are vacant with no current use (formal or informal). The area belongs to the Utility for water investments.

The routes of drinking water networks are on existing roads and the areas of water reservoirs are property of KASKI. However, two reservoir areas were recently acquired. An Ex-Post social audit will be prepared to assess/evaluate the completed land acquisition process against the requirements of the ESS5 and identify gap filling measures. Corrective action plan will be developed if substantial gaps are found to ensure material consistency of the past land acquisition with the requirements of the ESS5.

Kahramanmaraş (Centrum) Sewerage and Storm Water Project

The sub-project includes rehabilitation and construction of 400 km sewerage network and 100 km storm water network. The sub-project aims to solve the problematic areas in terms of sewerage and storm water networks in the city center, specifically Onikişubat and Dulkadiroğlu neighborhoods. The city center is located to foothill of Ahır Mountain. The rainwater from the high slopes of the mountain arrives to city center and causes flooding in streets since the closed storm water boxes are not capable of carrying the surface water flow. Recently in June 2018, a storm disaster, caused 3 losses in the city center besides the economic losses. It is reported that some of the storm water manhole lids and grids are covered or remain under roads which also prevents storm water entering through these grids/lids.

The routes of sewerage network are on existing roads and the areas of sewerage pumping stations are properties of KASKI. Existing roads will be used for the construction of storm water and sewerage network, requiring no land acquisition related documents to be prepared.

Ceyhan Basin Wastewater Treatment Plants

Ceyhan basin is one of the 25 basins in Turkey extends from İskenderun Bay to inner Anatolia region. Ekinözü, Çağlayancerit, Adıran and Göksun are sub-provinces of Kahramanmaraş and part of Ceyhan basin. According to the Ceyhan Basin Pollution Prevention Plan prepared in 2016, the wastewater treatment plants for Ekinözü, Çağlayancerit, Adıran and Göksun are parts of the measures required to prevent pollution in the basin. The increased population with the addition Syrian refugees increase the pressure on the river basin due to untreated wastewater discharges.

The project aims to enable KASKI (General Directorate of Kahramanmaraş Water and Sewage Administration) to provide local population and Syrian refugees with improved wastewater services. The project will also contribute to the prevention of pollution in Ceyhan River Basin.

The following 4 WWTPs and relevant collector line constructions are included under the sub-project:

- Ekinözü WWTP and Collectors: 0.95 km of Ø400 Concrete Pipes, 1.1 km of Ø200 Concrete Pipes, 23 Manholes, 1 pumping station, 1 WWTP
- Çağlayancerit WWTP: 1 WWTP
- Andırın WWTP and Collectors: 4.23 km of Ø400 Concrete Pipes, 3.51 km of Ø200 Concrete Pipes, 163 Manholes, Pumping Station and 600 m Pressure Line (600 m), 1 WWTP
- Göksun WWTP and Collectors: 4.617 km of (Ø600) HDPE Pipes, 107 Manholes, 1 WWTP

For the four WWTPs to be constructed, there will be a 4 km collector line which the need for establishing a right of way will be confirmed. Goksun WWTP site usage rights have been transferred from the Treasury. The land, which is vacant with no formal or informal use, is surrounded with plowed lands. There will be a 6 km collector line which the need for establishing a right of way. The treated water will be discharged to a nearby creek. Ekinozu WWTP site is located on the hills which is located close to a cemetery, creating no impact, however the WWTP area requires a private land to be acquired. Land valuation has been made and verbal consent of the landowner has been taken. Land is expected to be acquired through a negotiated settlement soon. Furthermore, there are no nearby electricity sources to be utilized for construction and operation of the wastewater treatment plants. The need for additional land take will require a RP to be developed. Details to the land take requirements of each WWTP site will be provided in the RP to be prepared. Any land-based livelihood impacts for the additional land acquisition works will be assessed and land acquisition process will be completed accordingly.

Andirin and Göksun WWTP sites are not directly accessible from the main road. Furthermore, there are no nearby electricity sources to be utilized for construction and operation of the plants.

Çağlayancerit WWTP site is accessible through a gravel road, yet to be enhanced and utilized throughout construction activities. Similar to others, no nearby electricity resources are available for Çağlayancerit WWTP, neither.

Ekinozu WWTP site will likely require a service road. It is planned that the treatment sludge from four WWTPs will be managed in Kahramanmaraş Centrum WWTP or in Kahramanmaraş Centrum Sanitary Landfill, depending on the calorific value of the treatment sludge. The sludge management options will also be discussed within the scope of the site specific environmental and social assessment studies.

Elbistan Drinking Water Network Project

Under this sub-project, rehabilitation of 255 km water distribution network, 4,128 km house connections, 3 km pressure lines, six new water reservoirs and five pumping stations will be rehabilitated/constructed.

A RP will also be prepared to assess land acquisition impacts and to propose mitigation and compensation measures in line with national regulation and WB ESS5 “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement” requirements.

Elbistan city centre’s water is supplied by a group of caisson wells drilled near Ceyhan River. Water from these wells are pumped to 5 existing reservoirs that feed 5 pressure zones. The existing

drinking network was first constructed in 1956-1957, then in 1984-1987 and finally in 2009. The pipeline constructed before 2009 is in poor condition. The water losses are high, estimated as 50%. Thus, some of the lines need to be renewed and new pipes need to be constructed for extending the distribution network to new developing areas.

The routes of drinking water networks are on existing roads and the areas of water reservoirs are property of the Utility KASKI. However, two reservoir areas were already acquired thus, an Ex-Post Social Audit will be prepared.

Elbistan Drinking Water Transmission Line

Elbistan Drinking Water Transmission Line includes 120 km water transmission line and 6 water reservoirs (volumes between 100-2000 m³). First part of the transmission line will be constructed by DSI.

The complete Elbistan Drinking Water Transmission Line has been designed by DSI and is composed of three sections. First section includes tunnels. Its construction has been initiated but left incomplete. The decision for urgent expropriation has been taken and the expropriation plans are ready, yet, no acquisition has taken place up to date. The construction of the second section has been initiated by DSI. Expropriation under the second section has been commenced by DSI and will be completed under their authority. Around 90% of the expropriation plans of the third section are also complete, however no activity has started. The first and third sections of the transmission line are planned to be financed under the project, however the second section implemented by DSI will also be covered within the scope of the site-specific environmental and social assessments since this section is considered as associated facility. Section 1 and 3 will require a RP to be prepared since expropriation is inevitable and not yet started. This RP will also include measures to monitor and evaluate associated activities carried out by DSI in section 2. If land acquisition is commenced by DSI in section 2, prior to Project kick off, an Ex-Post Social Audit will be prepared to follow up on the implementation of the land acquisition process carried out by DSI. This Ex Post Social Audit will cover both this sub-project (where necessary) and Elbistan Drinking Water Network sub-project.

Sub-project 3: Kayseri

Extension of Kayseri Wastewater Treatment Plant

In Kayseri, refugee population includes Syrians, Afghans and Iraqis and their population is around 100,000 (official figure is 74,612). They are mostly located in Melikgazi district.

Project will provide financing for extension of the existing wastewater treatment plant (WWTP) which has been under operation since 2004. The plant (Figure 1) was designed for removal of carbon, nitrogen and phosphorus with a design flow rate of 110,000 m³/day. The WWTP was designed to serve the central districts of Kayseri, namely Kocasinan and Melikgazi. Wastewater from three more districts, Talas, Hacilar and Incesu, were connected to the WWTP bringing and additional population of 160,000. Compared with the design considerations; unforeseen immigration of Syrians accelerated reaching to projected target extension year 2025 flow rate. Especially considering that dry weather flow rate of 183,000 m³/day is to be reached soon, the urgency for extension of WWTP to 1.4 million PE is underpinned.

Within the Project, additional units for screens, aeration tanks, primary and secondary sedimentation tanks will be constructed for capacity extension. Sludge unit will also be renewed by replacement of the existing belt filter press with decanters. Through the added units, capacity of the WWTP is planned to increase up to 183,000 m³/day. Effluent from the WWTP is currently discharged to Karasu Creek. There will be no change in the discharge system.

The organic load of influent wastewater (470 mg BOD/l) has exceeded the design value (382 mg BOD/l) and results in higher amount of treatment sludge, this brings an additional challenge for the relevant utility to deal with transportation of extra sludge. Additionally, solar sludge drying facility will be constructed. Additionally, solar sludge drying facility will be constructed. Effluent from the WWTP is currently discharged to Karasu Creek. There will be no change in the discharge system.

Land is owned by the utility. There are no formal/informal users. No land acquisition is required. According to the property deeds shared by MM, expropriation of the WWTP area and solar sludge drying facility area was completed in 2003.

Sub-project 4: Konya

Konya sub-project will focus on water system services and include the following project:

Aksehir Water Supply Project

According to Konya Metropolitan Municipality, more than 150,000 refugee population (officially registered 107,664 people) is living in Konya including Syrians and Afghans. There is no camp system for the refugees, and they are mainly living in the central districts of Konya. In Aksehir, where the proposed sub-project will be located, number of refugees is around 5,000 people. Syrians are mostly working in agriculture and construction sectors.

In Aksehir which is a district of Konya, the project will finance construction of

- (i) 29 km of water transmission lines,
- (ii) 97 km of distribution network including house connections,
- (iii) three water reservoirs (3,000, 1,000 and 500 m³) and pressure reducing chambers.

Existing water distribution network was constructed in 1990 and the capacity of the system is already reached. Thus, the project aims to renew existing water system for the city of Aksehir in order to provide healthier and sustainable water services to customers.

In Aksehir, drinking water is currently supplied from groundwater wells. Through the project, spring waters in Gemen (15 lt/s), Sucikan (50 lt/s) and Ilica (20 lt/s) will be transmitted and distributed to Aksehir for drinking water purposes. The Project will lead significant decrease in energy consumption as spring water will be transmitted by gravity.

Land for the transmission lines and the water reservoirs are owned by the General Directorate of Forestry. The Utility (KOSKI) will obtain required permissions for right of way. There are few users (beekeepers) close to the site of transmission line. Details to the impact on beekeepers will

be discussed under the ESMP. Existing distribution lines will be used for rehabilitation of the distribution network.

Ilgın Wastewater Treatment Plant Project

The details to the environmental and social risks and impacts (including ones relevant to land take) will be provided after the completion of feasibility study.

Çumra Wastewater Treatment Plant Project

The details to the environmental and social risks and impacts (including ones relevant to land take) will be provided after the completion of feasibility study.

Sub-project 5: Osmaniye

Officially, Syrian population in Osmaniye is 54,175. The team also visited Cevdetiye Camp which hosts more than 15,000 Syrians. According to Osmaniye Municipality, Syrian population corresponds to 20 % of total population. As the camps in Suruc and Ceylanpinar in Sanliurfa have been closed, more refugee people are expected to move to Osmaniye. Sub-projects in Osmaniye covers:

- (i) Osmaniye (Centrum) Drinking Water Project (598 km network) and
- (ii) Osmaniye (Centrum) Sewerage Project (403 km network).

The project will lead significant decrease in energy consumption as spring water will be transmitted by gravity. Replacement of old asbestos distribution network with new network will reduce physical losses in the system and will prevent public health hazards that might arise from asbestos. In addition to the proposed works, the sub-project is also expected to introduce significant operational improvements such as establishment of District Meter Areas (DMAs) to reduce water losses and increase efficiency.

All the designs will undergo a design review, to be carried out by the project supervision consultants prior to construction as part of due diligence to ensure robustness and responsiveness to aspects such as climate resilience, energy efficiency, etc.

Water resource in Osmaniye is Amazon Spring and Arslantas Dam. There is no water treatment plant, only chlorination system exists. Osmaniye Municipality plans to have a water treatment plant treatment of both spring water and dam water.

There are no private lands to be expropriated and/or any formal or informal users on the affected public lands within the scope of sub-projects. Land for water reservoirs belongs to the Treasury (two of them are forest land and three of them are public land). There are no known natural and/or cultural protection area at the project sites.

The two key activities described briefly below:

Osmaniye Centrum Drinking water Project

Osmaniye drinking water project will focus on the distribution network and will include construction of approximately 598 km water distribution network (pipe diameters changing from 110 to 900 mm), 5 water reservoirs, pressure release valves, DMAs and auxiliary infrastructure. These activities seek to address critical water supply service constraints faced by the municipalities in delivering effective and efficient services, including: (a) frequent pipe breakage and subsequent contamination of water due to severe corrosion of existing pipes (cast iron, asbestos cement), and high pressure fluctuations – water utility records show about 200 calls per month, with about 30 percent of these related to the main network and 60 percent to customer connections; (b) non-revenue water is very high at 56 percent, of which 49 percent are real losses.

Osmaniye Centrum Sewerage project

Osmaniye sewerage project aims renewal of 403 km of wastewater collection network. The existing collection network was mainly constructed in 1985 and is prone to deficiencies due to aging and connection types used at that time. The high groundwater level also creates problems such as high amount of infiltration to the pipes and entrance of soil granules to network, which creates additional costs for operation. It is stated that approximately 100 failure calls are received from customers due to failure and/or collapse of pipes.

The investments carried out under the project will adhere to both the Republic of Turkey Environmental and Land Acquisition related Regulations and the World Bank Environmental and Social Standards. In order to do so, ILBANK will act as the financial intermediary to ensure that related WB standards and procedures are followed after the Municipality / Utility ensure that all Turkish environmental and land acquisition related approvals, licenses and permits have been secured.

Previously, the WB has financed four similar projects namely; the Municipal Services Project-I and II (MSP-I, MSP-II AF), Sustainable Cities I and II (SCP I and II) through ILBANK. Heretofore, the MSP successfully provided financing in three specific areas, including water supply, wastewater and solid waste investments for 12 participating municipalities and 2 water utilities. MSP was closed on 30 November 2016. Currently, SCP-I and SCP II are under implementation with 2 cities in each project; Muğla and Denizli for SCP I and Antalya and Muğla for SCP II with water and wastewater investments. In this respect, FRIT-II will also be targeting the similar investment priority areas in which ILBANK has experience.

Land acquisition and resettlement impacts under the project are expected to be entirely under Component A. The project will include municipal investments for urban infrastructure under Component A that will have temporary and permanent land acquisition, and potential resettlement impacts. Regarding land acquisition and for the other social impacts of the project, all the documents that need to be prepared are described under Table 2.

Site-specific impacts will be followed by the supervision consultant during the implementation of the project. And in case of a need, additional RPs will be prepared and implemented by the sub-borrowers. ILBANK will supervise the implementation of RPs.

3. Principles & Objectives Governing Resettlement

Land acquisition and resettlement will be governed by the following principles:

- The relevant Turkish legislation and World Bank ESS5 will both be followed, in cases where there are gaps between the legal regimes, measures will be taken to meet the standards set in ESS 5.
- The property and inheritance rights of persons will be respected.
- Potential economic and social impacts of land acquisition/resettlement on affected persons (on livelihood of them also) will be assessed.
- Categories of stakeholders, including vulnerable groups, will be identified and consulted with.
- Categories of affected persons and their respective entitlements will be identified.
- The public will be fully informed, and processes will be transparent. Furthermore, affected persons will be meaningfully consulted, they will be given opportunities to participate in planning and implementation of resettlement programs.
- All possible steps will be taken to minimize acquisition of productive, privately owned land and to avoid acquisition of residential areas (and thus involuntary resettlement) through careful selection of the needed sites.
- Valuation of land, businesses, and other assets for which compensation is given will be based on the full replacement cost as defined in ESS 5⁸.
- In the case of agricultural land, valuation of the land will include crops value as well as other land related livelihoods and assets.
- In cases when there are people working on the affected land or businesses, but they are not land owners (tenants, users, or wage earners), the compensation should be in an amount or manner to ensure that they will not be worse off than before the project.
- Regardless of the formality of ownership, for those whose livelihood depends on land and common resources, (including common lands), the compensation provided would be at the level to ensure that the affected people could restore their livelihood to pre displacement levels.
- If the land needed for expropriation is public land used informally, the project affected people, without formal title, will be compensated for the crops and any investment they have made on the land. In the case where land is needed in a temporary basis, owners will be compensated in full market rental price for the period during which the land is used and the land will be given back to the owner in the same condition as before it was rented.

⁸The Bank's Environmental and Social Standards require that all affected assets (land and structures) are compensated at their replacement cost. Replacement cost of an affected asset is equivalent to the amount required to replace the asset in its existing condition. The replacement cost of structures should be equal to the cost of constructing/purchasing a new structure, without making any deductions for depreciation.

- In exceptional cases if resettlement is unavoidable, in addition to the full replacement cost, affected people will be provided assistance for relocation and related expenses in line with the resettlement plans. Resettlement activities will be conceived and executed as sustainable development programs, providing sufficient investment resources to enable displaced persons to share in project benefits.
- Special assistance programs for vulnerable groups (if any) including the persons without any immovable property, will be provided.
- Provide and prepare the plans for grievance redress and RP implementation monitoring in line with the WB procedures.
- Land acquisition and resettlement activities will be monitored and reported on a regular basis to ensure timely and effective implementation of RPs.
- Preparation and implementation of the RP will be done in a transparent manner with the participation of affected persons and relevant institutions.
- All relevant stakeholders will be informed and updated as deemed necessary on the sub-projects' land requirements, their RP implementation process, entitlements and grievance redress mechanisms etc.
- Any such infrastructure facilities as roads, water pipelines, and communication networks etc. disrupted by the construction of sub-projects will be replaced.
- All needed steps will be taken to ensure compensation, registration and transfer issues are resolved with owners without seeking court intervention, unless unavoidable.
- Affected people will be compensated in full before construction begins and all activities and procedures will be formally documented.
- Expropriation Law No 2942 shall be taken into consideration in the determination of compensation amount to be paid to the affected people.

4. Process for Preparing and Approving Resettlement Plans

The expropriation procedure starts after the Municipality or municipal water and wastewater utility determines the need to acquire land or other properties and related assets as a result of a given sub-project. The feasibility studies carried out and relevant documents prepared for each sub-project will provide information on the need to carry out a land acquisition process or resettlement.

Consistent with best practice as indicated in ESS5, the implementing agency (Municipality or the Utility) will conduct a survey of the land, crops, buildings, and census/survey (including asset inventory) of affected persons. This will form the basis of land acquisition and/or resettlement plans. This survey and census should be carried out as soon as possible after the identification of a given sub-project for which there is a need for displacement, land acquisition, or resettlement. This census/survey is the primary means of data collection, which should be conducted as soon the project area is defined. Census/survey should be carried out prior to land acquisition works; which should be planned to commence within maximum 1 year from the execution of the census/survey. Should land take works commence after 1 year from the time of census/survey, the

information collected should be updated by the implementing agency for any changes that might have occurred within that period.

After the census/survey, the relevant Municipality or municipal water and wastewater utility shall prepare a RP. Since the RF sets out the policy principles and spells out the entitlements, eligibility criteria, institutional arrangements for monitoring and evaluation, the framework for participation as well as mechanisms for grievance redress, the RPs to be submitted need not include this information and can refer to the RF. The sub-projects' specific RPs need to be prepared according to the principles indicated in ESS5.

The RP prepared by the relevant Municipality or municipal water and wastewater utility shall be submitted to ILBANK for review and comments. Once ILBANK is satisfied with the document, the plans will then be submitted to the World Bank for review and clearance. After the clearance, the Municipality or municipal water and wastewater utility is responsible for disclosing these documents at the local level in a manner that is accessible to Project Affected People (PAPs) and other stakeholders in Turkish language and any other languages that the affected population or stakeholders would require. ILBANK and World Bank will disclose the plans on their respective websites both in Turkish and English.

All plans should be cleared and disclosed before construction begins on the affected land.

5. Potential Impacts of the Project and Affected Persons

PAPs are the owners of land, properties, and businesses that will be used for the implementation of the sub-projects, either permanently or temporarily, as well as those whose livelihoods are connected to the affected land or properties. They include the following categories:

- Landowners who lose all or part of their land,
- Owner of businesses affected by temporary or permanent land acquisition or which have access restriction,
- Employees and workers of businesses that may be affected by temporary or permanent land acquisition,
- Property owners who, as a result of the project, have to be resettled;
- Property owners whose land will be needed during the construction on a temporarily basis;
- Formal renters of land or property affected by land acquisition;
- Those who are not owners or formal renters of the affected land or properties but they either reside on or their livelihoods are directly dependent on, the affected land or properties (e.g., tenants, those earning wages from working on the affected agricultural land or working on the affected businesses, or are using the land informally with or without the permission of the owner).

In case that the sub-project is located in rural areas and agricultural land could be affected, the impact goes beyond the value of the land, which is taken and includes crops and other affected land-related livelihoods and assets.

Land requirements of the sub-projects may necessitate ownership rights or easement to be established on subject lands. Permanent land take will require ownership rights to be established while easement will be established on lands that will require temporary land take. On lands with easement, land may be handed back to rightful owners with some limitations; such as not building any structures or planting deep rooted plants and trees, allowing for the land to be used to a certain extent.

6. Eligibility Criteria

Any person who will suffer loss or damage to an asset, business, trade or loss of access to productive resources, as a result of land acquisition or restrictions on land use undertaken or imposed in connection with the project will be considered eligible for compensation and/or resettlement assistance.

The *cut-off date* for being eligible for compensation and/or resettlement assistance will be the last day during the completion of the census/inventory of assets, which represents a provisional cut-off date for eligibility for resettlement assistance. Sufficient public awareness of the cut-off date will be given to the community through the responsible agencies, media, community elders and leaders by the implementing agency.

7. Legal Framework

Turkish Legal Framework for Land Acquisition and Resettlement

Land Acquisition

The legal basis for the acquisition of the land will be as follows:

1. Expropriation Law (Law No. 2942-approval date: 04.11.1983) and Laws concerning amendments to the Expropriation Law (which includes Law No. 4650-approval date: 24.4.2001 and other laws);
2. Municipal Law (Law No. 5393- approval date: 03.07.2005)

In the scope of Turkish legal framework, land acquisition/expropriation is based on the Expropriation Law No: 2942 (amended by Law No: 4650 in 2001). In addition, Article 46 of the Turkish Constitution explains that state and legal public entities, in cases of public benefit, are entitled to entirely or partially expropriate immovable properties in private possession, on condition that the real value of those immovable properties are paid in advance and in cash; and to establish easement rights on these immovable properties in compliance with the procedures and principles set by expropriation law. In other words; Constitution implies that any immovable property cannot be confiscated unless its expropriation compensation is paid to the owner/s in advance and in cash.

Compensation for the expropriated estate is determined pursuant to procedures and principles in Articles 8, 10 and 11 of the Expropriation Law No 2942. Valuation criteria are stated in the Article 11 of the Law. The Expropriation Law defines that determination of the compensation for the expropriated land depends on average annual net income derived from that land by taking into account rotation system, valuation of structures includes the calculation of construction unit prices, and valuation of plots (housing) depends on peer assessment. Valuation commission is internally established by the organization responsible for land acquisition and comprised of at least three members. In case of a necessity, this commission can get information from Chamber of Industry and Commerce, real estate agencies and other individual or institutional authorities that are specialized on those points.

Announcement

The valuation commission delivers valuation document to negotiation commission, which is internally established by responsible agency. This negotiation commission is also comprised of three members and conducts negotiations with property owners. Then, the municipality or the municipal water and wastewater utility (responsible agency) notify the affected people through an official registered mail and invites them for negotiations. In the case of land and property owners, the notification mentions the intent of the municipality or municipal water and wastewater utility to purchase the land (or to establish easement right on the land in question) through a negotiated settlement and clearly describe steps in the land acquisition process and provisions for litigation available to the landowner and relevant steps.

In case of the owners do not live on the land, reasonable efforts are made to reach them by: 1) Local inquiries for current address research from villagers and village head (mukhtars), 2) Inquiry of last known residence from land registry and cadaster records, and law enforcement records through their national identification number, and 3) Official advertisement in newspaper pursuant to Article 10 of the Expropriation Law 2942. If the owners can still not be reached, the compensation for the land is deposited in their name to a Bank account. The owner can withdraw the compensation at any point in time.

Transaction

The purchase of land and affected properties can take place through two processes: negotiated settlement, or court settlement.

Negotiated Settlement: The process for purchasing the land and the related immovable property through negotiated reconciliation, pursuant to the principles and procedures set out in Article 8 of Expropriation Law No.2942 and this RF. If the owner agrees to a negotiated settlement, then discussions between the owners and the municipalities or municipal water and wastewater utilities take place to finalize the transaction. Minutes of the proceedings regarding this agreement are signed by two sides. Then the expropriation compensation is paid to rightful owner within 45 days and the property is registered in the name of government following alienation. This way of purchase is considered as expropriation and right to sue against this expropriation and amount of expropriation compensation cannot be processed. The municipality or municipal water and wastewater utilities should make it clear that negotiations will last for no more than 3 months and will provide the landowner a description of the land acquisition steps and the owner's rights to due

process and litigation at each step. Failure to reach a negotiated settlement will result in a court settlement.

Court Settlement: A court settlement will occur if: a) the negotiated settlement fails; or b) the owner, after receiving notification from the municipality or municipal water and wastewater utility, declines to negotiate; c) in case of customary rights; d) in case of deceased or absentee owners. Prior to requesting a court settlement, rights to due process and litigation will be explained fully to the landowner.

A lawsuit will be filed by the Municipality or municipal water and wastewater utility with a relevant court of first instance for valuation and registration, pursuant to Article 10 of the Expropriation Law. The costs of the court process are born by the responsible agency according to the Expropriation Law. Particularly, in case of the court process cannot be concluded within 4 months, legal interest rate is applied to determined compensation amount as from this deadline.

In general, according to the article 12 of the Expropriation Law, if a land is partially expropriated and in case of the remaining part is not usable, this part shall also be expropriated upon the request of the owner within 30 days following receiving expropriation decision.

Urgent Expropriation: Article 27 of the Expropriation Law authorizes the organization responsible for expropriation to confiscate the immovable assets required by the project earlier than the time needed in normal expropriation procedure. This process does not prevent challenges of the property owners against the determined valuation.

If the urgent expropriation is unavoidable, right owners (displaced persons) should be meaningfully informed at initial phase of land acquisition by responsible agency.

Involuntary Resettlement;

In case of physical or economic resettlement comes into agenda in any project, Municipality or municipal water and wastewater utility which is responsible for land acquisition, can provide collaboration with other organizations related with resettlement planning and implementation according to the Municipal Law (Law No. 5393).

Objectives and Required Measures under ESS 5

The World Bank ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement includes safeguards to address and mitigate risks resulting from involuntary resettlement under development projects, and covers any involuntary land taking.⁹

The overall objectives of the Bank's policy on involuntary resettlement are the following:

- (a) Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- (b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment

⁹ The full text of the policy and guidance on implementation can be accessed at: <http://go.worldbank.org/ZDIJXP7TQ0>

resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.

(c) Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

To address the impacts covered under involuntary settlements of this policy, the policy requires the borrower to prepare the RF whereas the Municipalities (implementing agencies) will prepare the RPs where necessary. RP will cover the following:

(a) The resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are

(i) informed about their options and rights pertaining to resettlement;

(ii) consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and

(iii) provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.

(b) If the impacts include physical relocation, the resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are

(i) provided assistance (such as moving allowances) during relocation; and

(ii) provided with residential housing, or housing sites, or as required, agricultural sites for which a combination of productive potential, locational advantages, and other factors is at least equivalent to the advantages of the old site, compensation for their losses at full replacement cost and assistance in improving their former living standards, income earning capacity and production levels or at least restoring them.

ESS5 requires that no land shall be acquired before compensation is paid completely to the affected people.

Moreover, ESS5 requires the Project to create and implement a resettlement plan, the preparation of which involves the involuntary resettles and hosts in planning. In this regard, ESS 5 requires the Project to systematically inform and consult affected persons about their options and rights during the preparation of the resettlement plan.

“**Replacement cost**” is the method of valuing assets endorsed by ESS5: “For agricultural land, it is the pre-project market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes.”

ESS 5 also recognizes that some types of loss, such as access to public services, customers and suppliers, grazing or forest areas, cannot easily be compensated for in monetary terms and,

therefore, requires the Project to attempt to make or establish access to equivalent and acceptable resources and earning opportunities.

While ESS 5 covers all affected people, it calls on the Project to pay particular attention to the needs of the vulnerable people.

Gap Analysis

National legislation and processes regarding land acquisition have a long-lasting history in Turkey. They have been updated in the years of implementation to improve the process to solve the problems encountered and to incorporate some requirements from international best practice. However, there are still some issues creating gaps between Turkish legislation and World Bank ESS 5. In this regard main gaps can be summarized under the following issues:

(i) Compensation/assistance to renters, and other informal users of lands, who do not own property: According to Bank's ESSs, as well as official users of the land, unofficial users of the land are also defined as PAPs. Turkish legislation does not require payment of compensation to tenants and unofficial users of land/properties¹⁰. However, according to Bank's procedures, persons who have spent money and constructed buildings or other structures on the lands of other persons are compensated at full replacement cost. They are also compensated for standing crops and economic trees they planted on the land they use unofficially, and assistance if needed to restore income/livelihood lost as a result of being displaced from the land in question.

Compensation provided will ensure that the livelihoods of renters and other informal users of land are not affected. In addition to the legal compensation amount for the official landowners, for other people who have no legal rights, cost will be provided from social aid funds of the Municipalities and/or governorates.

ii) Replacement Cost: According to Bank's policies, loss of immovable such as land and other fixed assets should be compensated at full replacement cost before the construction starts. Considering the cash equivalent to replacement cost will be used as a compensation method, legal landowners will be compensated for loss of land, and tenants, public land users and squatters would be entitled to the replacement cost of what they have invested in the land. According to Turkish legislation, only the legal property owners can get monetary compensation and there is a clause in the law indicating that depreciation shall be deducted in the valuation process for the buildings (for expropriation), which may cause the expropriation value to be less than the full replacement cost as defined in ESS5 (which does not allow for applying depreciation). The compensation for the loss of income, access to common properties or social losses (such as opportunity costs) is not clearly stated in the Turkish legislation.

The difference between full replacement cost and compensation to be paid will be provided from social aid funds of the Municipalities and/or governorates.

¹⁰ According to the amendment on article 19 of Expropriation Law, persons who have spent money and constructed/erected buildings or other structures on the lands of other persons are compensated at full cost for trees and material costs for buildings. But material costs need to be reached replacement cost according to Bank's operational policies.

(iii) Request for the expropriation of unviable land due to partial expropriation: According to law, land owners subject to partial expropriation have a right to request the expropriation of the remaining land within 30 days. ESS5 does not define a time limit for such requests. If there is a partial expropriation request for the remaining part of the land, sub-borrower will ensure to receive this request within 30 days.

(iv) Scope of project affected people: According to Turkish legislation, only people who lose legally owned land are considered as project affected people (PAP). Thus, the possible losses of other project affected persons such as the non-title holders and users of public lands, host population, nomadic/migrants (using the project area) or economically displaced people are not recognized and there are no provisions to mitigate the adverse effects of the projects on these people. In Turkish legislations, most of these groups are not considered as PAP.

For such people who are affected and fall under the definition of ESS5, mitigation measures such as occupational education or some job opportunities etc. will be provided.

(v) Resettlement Action Planning: There is no statutory arrangement for preparation of a Resettlement Action Plan covering all displaced persons and host families. Therefore, the preparation of RPs by the sub-borrowers will be required. If land is acquired before the sub-loan agreement is signed, Ex-post social audit (retroactively) reporting procedures will be carried out (outline provided in Annex 3). Also, for the projects that entail additional land acquisition in the future, proactive study and reporting will be carried out by the sub-borrowers.

(vi) Public Information Disclosure, Consultation and Participation: There are no provisions regarding information disclosure to public, public consultation and participation in the Turkish legislation regarding land acquisition. In the scope of normal expropriation procedures, an invitation letter is sent to property owners for the aim of informing and inviting rightful owner to negotiations within 15 days. Therefore, rightful owner becomes aware of land acquisition and has the opportunity to negotiate and/or challenge the proposed compensation amount.

ESS5 requires full public disclosure of RF and RPs.

For this project, Municipalities/ Water and Wastewater Utilities are responsible for arranging consultation meetings before land acquisition procedures begin with affected persons to inform about the land requirements of the sub-projects as well as the availability of a RF, the draft RPs that include entitlements, and resettlement planning and implementation if any.

In addition, the RF and RPs will be disclosed at the local level and on ILBANK's website.

The municipality or the municipal water and wastewater utility will also notify the other affected groups and stakeholders in addition to the people who have legal rights, including those who have made investment in public land or are occupying the land without formal rights, and tenants, through an official registration mail as they notify the land and property owners and with consultations. In the letter, information about the related sub-projects and impacts due to land requirements will be provided.

(vii) Grievance Redress Mechanism (GRM): There are channels for lodging grievances under different laws of Turkey (2942 Expropriation Law, 3071 Grievances Law, and 4982 Access to Information Law), but these are through more formal and legalistic mechanisms.

For this project, grievance redress mechanisms will be developed within the municipalities/Water and Wastewater Utilities, consisting of accessible and documented grievance redress handling at sub-project and municipal levels. These project level grievance redress mechanisms are supplementary, but do not substitute for the formal legal mechanisms, which remain available to PAPs who choose to pursue them.

8. Methods of Valuing Assets

Under Turkish Law, a valuation committee is internally established by the relevant Municipality and/or municipal water and wastewater utility. This committee needs to determine the estimated expropriation value of an asset through having reports of expert persons, institutions and organizations or if needed making use of information from chambers of industry and commerce. The Expropriation Law defines that the compensation for the expropriated estate equals the commercial value of the asset.

The valuation commission determines the estimated ceiling value of immovable properties in the expropriation area. During the valuation of immovable assets or resources, valuation commission has to take into account the following valuation criteria, which is mentioned in Article 11 of the Expropriation Law:

- a) The nature of the immovable property or resource
- b) The size of the immovable property or resource
- c) All characteristics and elements, which could affect the value of the immovable property or resource, including the individual value of each element
- d) Tax declaration (*taxes paid on that immovable property or resource*), if any
- e) Previous values of property determined by official bodies at the date of expropriation
- f) For lands, the net income that could be derived from the immovable asset or resource (without undertaking any changes, using the immovable property or resource in the same conditions as of the expropriation date)
- g) For house plots, the amount for which equal (similar) house plots have been sold without any special purpose, prior to the date of expropriation
- h) For structures, official unit prices (annually issued by the Ministry of Environment and Urbanization) at the expropriation date, calculations of the cost of building, and depreciation for wear and tear
- i) Any other objective criteria that could affect the value of the property or resource.

In addition to the consideration of the above variables under Turkish law, defining entitlements under the FRIT-II Project will be in accordance with the entitlement matrix below.

During implementation, Municipality/Utility, will determine the compensation amount according to the entitlement matrix below by using the gap analysis. If there are any gaps to be found by ILBANK, measures will be taken to meet the ESS5 standard of replacement cost.

There might be individual cases where negative or severe impacts are not addressed through providing full compensation at replacement cost. In such cases, additional assistance for livelihood restoration will need to be provided to PAPs. Categories eligible for additional livelihood assistance are also covered in the below provided Entitlement Matrix.

Project Entitlement Matrix

Affected Categories	Entitlement
Loss of entire land holding	Full replacement cost (market prices + transaction costs). Maximum effort to avoid land take before harvest (on agricultural lands).
Partial loss of land	Full replacement cost of the part of land lost. (market prices + transaction costs). Maximum effort to avoid land take before harvest (on agricultural lands).
Unviable, redundant parcels of land/structures	If the remaining parcel of land after expropriation of a part of it is not economically viable, it will also be acquired and compensated (at full replacement cost) if the owner so desires.
Structures and other fixed assets on the land (barns, shacks, wells, fences, etc.)	Full replacement cost. Depreciation will not be deducted. Additional supports such as moving allowances and transitional allowance (depending on the case, income restoration assistance package such as equivalent of 6 months of minimum wage or a job opportunity or other social support mechanisms facilitated by municipality and/or other institutions) will be provided.
Crops, trees, and other land-based products	The crop value (market price) and investment amount made for the crop (input, labour, age of trees). Each crop and/or tree will be considered according to its characteristics (annual or perennial, maturity, average yield on a minimum of 3 years etc.)
Land needed on temporarily bases	The market rental price for the duration of the lease. The land should be returned to the project affected individual, in the same condition as it was taken. If agricultural land and crops lost during the lease, the owner should be compensated for the crop losses for the duration of lease. If land is used for business and income is affected during the lease, the business shall be compensated for losses for the duration of the lease.
House	Full compensation based on the replacement cost in a similar/comparable area plus moving and transitional allowance (depending on the case, income restoration assistance package such as equivalent of 6 months of minimum wage or a job opportunity or other social support mechanisms facilitated by municipality and/ or other institutions). Depreciation will not be deducted.
Legal Renters	Assistance with finding a new place and moving and transition allowance. If lease is terminated early, compensation to ensure that renters do not suffer losses.
Employees or workers on the land or businesses	Compensated for their income earned from the land, crops, and any investment made on the land, in a manner that they will not

Affected Categories	Entitlement
	be worse off than before the project. For employees and workers additional allowance (depending on the case, income restoration assistance package such as equivalent of 6 months of minimum wage or a job opportunity or other social support mechanisms facilitated by municipality and/ or other institutions) will be paid.
Informal users	Compensated for the crops and the value (at full replacement cost) of other investments made on the subject land. Assisted in their effort to improve their livelihoods and standard of living to restore them to pre-displacement levels
Businesses affected	Full replacement cost of affected business place. Transitional assistance to re-establish business in new location and compensation for lost income (depending on case and time lost) as necessary.
People who have lost more than 10% of their land	Assist PAPs to ensure that livelihoods are restored. Replacement cost of the loss of land/assets; Additional compensation measures.
Vulnerable groups (such as single women headed households, households with disabled members, households under poverty line as determined by household receiving social assistance) who demonstrate they have suffered negative livelihood impact	Assist PAPs to ensure that livelihoods are restored. Depending on case, livelihood restoration package such as Equivalent of 6 months of minimum wage or depending on case, a job opportunity or other social support mechanisms facilitated by municipality and/or other institutions.

Valuation of Easement Rights

As a basic principle for the indemnification of temporarily acquired land, the landowner shall be compensated for the restricted access and usage rights as well as the loss of productivity and income experienced during the period of limited or restricted land usage.

During the production of expropriation plans, the area on which easement right will be established is determined together with its coordinates, and then the plan is produced.

In areas where permanent easement right will be established; the loss of value caused on the property by the easement is taken as the cost of easement right. Permanent easement right is annotated to the land register and its cost is paid to the right-holder.

In areas where temporary easement right will be established; the loss of income caused on the property by the easement is taken as the cost of easement right and paid to the right-holder.

For easement right, the procedures required under ownership rights shall be applied; however, the areas subjected to establishment of temporary and permanent easement right are restored before they are handed over to their owner.

To ensure accurate calculations, appraisers firstly visit the expropriation area and take account of its current status of use, determine all the factors (soil structure, status of use, topography, climate, proximity to settlements and roads, favourable transportation conditions, location, current pattern of rotating plants in the region and whether or not irrigated and dry agricultural activities are

carried out) that may affect the value of the relevant immovable property in accordance with Article 11 of the Expropriation Law.

For long term easement, the plot price determination for compensation cannot surpass 35% of value of the market price if the land were sold. This represents the top allowable price according to Turkish law. There is no change in ownership and restrictions are removed when the use of the area ends.

In addition to the national legal requirements, the relevant Municipality and/or municipal water and wastewater utility will follow the Entitlement Matrix above which details the entitlements in order to comply with the World Bank's ESS5.

9. Organizational Procedures & Implementation Process

As the Borrower, ILBANK would on-lend the loan/grant to municipalities by sub-loan/sub-financing agreements. Specifically;

- ILBANK will ensure that any land acquired or/and any resettlement¹¹ which may result from any of the sub-projects proposed by the Municipalities or municipal water and wastewater utilities financed by the Bank loan/grant will be in compliance with this framework document.
- Before financing the sub-projects, ILBANK will make sure that the social and social safeguards issues are identified by the Municipality or municipal water and wastewater utility, the processes spelled out in this framework are followed, and in the cases when there will be a need for land acquisition or resettlement, a RP is prepared in accordance with this framework, submitted to the World Bank for review and clearance and disclosed, locally on the ILBANK website. The ILBANK's role includes instructing and building capacity of municipalities to understand and implement the RF; through support, review and comments, ensuring that municipalities prepare RP or Ex Post Social Audit according to the RF; and monitoring and implementation of the RPs by the municipalities, and reporting to the Bank, using the reporting format attached to this RF (Annex 3).
- ILBANK will ensure that, to the extent possible, sub-projects, which involve land acquisition or resettlement, are avoided. In other words, land acquisition is kept to a minimum level based on the technical requirements within this framework document.

During the implementation of the project, when land acquisition or resettlement is necessary, ILBANK will inform the Bank of the need to carry out an expropriation or resettlement process for the proposed sub-investments. ILBANK then will follow that the municipality or municipal water and wastewater utilities carry out the procedures in this framework in a satisfactory manner and prepare the relevant safeguards documents.

¹¹ Under ESS 5, Involuntary Resettlement is referred to the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets, including land or access to assets; or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location. In summary, "involuntary resettlement" under the ESS 5 not necessarily involves physical relocation and refers to all types of land taking and the impact on all assets, which can include physical relocation. However, for the purpose of this RF the term "land acquisition" is used in addition to "resettlement", former only refers to taking of land and latter includes physical relocation.

During the implementation of the RP, ILBANK will monitor the implementation. Upon the transfer of ownership of the land to the municipality or municipal water and wastewater utility, based on appropriate documentation inform the Bank that the expropriation or resettlement process is over and the municipality or municipal water and wastewater utility has full control of the land. Only after the expropriation process is over, following the specifications included in this framework policy document and including payment of all compensation and provision of all assistance required, construction process would start to be financed by the World Bank.

To improve the supervisory role of the ILBANK, based on the lessons learned from the Municipal Services Project and SCP I and II, ILBANK PMU, as well as staff involved at the municipal level, will be provided training on the WB Environmental and Social Standards. As ILBANK signs sub-loan/sub-financing agreements with municipalities, contact staff who will be involved with land acquisition and resettlement aspects of the project at the municipal level will be identified. The World Bank, together with ILBANK, will provide initial training and support on ESS5 requirements to such municipal staff, after which ILBANK will assume responsibility for implementation support to the municipalities.

9.1 Implementation Process for Due Diligence of Past Land Acquisition

Due to the nature of the project, majority of the Municipalities/Utilities who apply to the loan/grant have acquired land before either through private transactions or expropriation. In such case, an Ex-Post Social Audit needs to be undertaken for compliance of ESS5 and to address if there are any gaps to be found against the ESS5 requirements. The Ex-Post Social Audit would make sure all of the PAPs were compensated at their replacement cost, PAPs were aware of their rights and entitlements under the RF, and had knowledge of and access to the grievance redress mechanism for any possible claims, and no vulnerable or severely impacted people were worsen off.

In order to apply this framework retroactively and assess that all individual compensation payments were made at replacement cost or under other specified standards, the following procedure will be applied:

An Ex-post social review report will be prepared and shared with the WB for no-objection. The social review should include the following information:

- Project description and key components.
- A census of project affected people listed in a Land Acquisition table with, parcel number, % of that parcel affected or acquired under the sub-project, land type (dry land, fig tree etc.), any assets on land, compensation unit price and compensation amount etc. The land acquisition table (in excel format) will be an annex to the social review.
- Methodology of land valuation in order to indicate how the compensation prices were determined and demonstrate if the compensations are at replacement cost or not. According to ESS 5, “replacement cost” would be calculated taking into account any taxes and fees that would be required for PAPs to purchase/register replacement land or assets.
- Impact categories according to Entitlement Matrix.

- Socio-economic information should be collected on the project affected people regarding their main livelihoods, whether the land-based activity is a significant source of income for them and whether there are any adverse impacts on their livelihoods resulted from the related sub-project.
- Information at the household level that would enable to identify any specific individuals who fall into vulnerability categories and/or suffer livelihood impacts that are not fully compensated by receiving cash at the replacement value for land and assets. Vulnerable people could be; (but not limited to) single, women-headed households, disabled, elderly, illiterate, poor households
- If there were any gender specific measures, good practices taken by the Municipalities/Utilities
- In cases where the Municipalities/Utilities had conducted any consultations, description (i.e. dates, content, level of participation, concerns raised etc.) of consultations with PAPs, headman(s) and other stakeholders if any,
- Grievance Redress Mechanism, Management of Grievances, and if there were any grievances recorded.

In case of any non-compliance/discrepancies to be found within the ex-post social review then mitigation measures will be taken, and this will be part of an action plan attached to the ESIA/ESMP of the sub-project.

Consultation and Disclosure of Ex-post Social Audit: The land acquisition table prepared by the Municipalities/Utilities should be consulted with the PAPs individually and under their consent. Each individual PAP should be able to verify her/his impact defined in the table.

10. Grievance Redress Mechanism & Right for Litigation

Under Turkish Law, the landowner can file an annulment lawsuit at administrative jurisdiction and correction lawsuit against mistakes of fact at jurisdiction within thirty (30) days of the official announcement of intent to expropriate. After failure or refusal to negotiate and at the conclusion of a court settlement, the owner can appeal the compensation level stated in the judgment at the Supreme Court of Appeals.

Moreover, to comply with ESS5 and to reduce the cases of litigation, the followings will be implemented:

1. The Municipalities and municipal water and wastewater utilities will assign a community liaison officer (CLO). The CLO will be in close contact with the representative of the affected people. The representative will be chosen by the community that will be impacted by the project in a participatory, accessible and transparent manner. The CLO needs to be accessible to the affected people. Depending on the severity of impact and the need of different municipalities, contact numbers of responsible officers will be provided to the affected people. CLO will arrange meetings during the implementation of the RF in a place and time which is accessible to the affected people and will be in communication with them in advance, depending on a given situation. In either case, CLO will keep grievance

logbook where he/she documents all received grievances, how these were responded to and resolved, and the time taken for these actions to happen. Besides keeping the logbook, two grievance forms will be used for grievance mechanism. First forms will be comprised as “grievance application form”. Following corrective action and redressing the grievance “close out” form is filled by the CLO. Sample Grievance Form is added as Annex 4 for the Municipality/Utility to use. The CLO mechanism is not a legal mechanism and only can address issues related to compensation amount, entitlement issues, problems which may come up during the processes of land acquisition and resettlement, among other things. The CLO will try to work with the affected party to solve the issues brought to him/her through negotiation and reaching an agreement with the affected parties to avoid or minimize, to the extent possible, the need for involvement of the formal channels for dispute resolution such as courts. Information on the CLO will be included in the RPs.

2. More generally, the following information in the following format will be included in all of the RPs:

Level	Authority	Method	Procedures	Response Time
1.	Community Liaison Officer (CLO) Municipality (phone number, address, e-mail)	In person, by phone, by writing, electronically-in all cases grievances will be recorded in a grievance logbook	Lodging of grievance will be confirmed. Grievance will be assessed. If needed, it will be examined on-site Response / redress of grievance will be communicated to petitioner. If cannot be resolved, Level 2 or Court of First Instance depending on grievance.	2 weeks
2.	ILBANK in Ankara (phone number, address, e-mail)	By phone, by writing, electronically	Lodging of grievance will be confirmed. Grievance will be assessed by the sub-borrower and IB will be informed. Response / redress of grievance will be communicated to petitioner by the sub-borrower. IB will monitor the sub-borrower to run the grievance mechanism smoothly. If cannot be resolved, petitioner will be referred to Court of First Instance.	4 weeks
3.	Responsible Court of First Instance (address)	By writing	Pursuant to legal regime	Pursuant to legal regime

Grievance redress mechanism will be operated in collaboration with the existing monitoring system of the Municipality/Utility. Complaints/grievances of women will be logged separately for easy monitoring of any possible gender specific vulnerability.

Both ILBANK and the participating municipalities and utilities will designate and disclose the names and contact numbers of their staff responsible of administering grievances.

As a separate GRM, communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance

redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

11. Funding

The land acquisition and resettlement process for the investments will be carried out by the Municipalities or municipal water and wastewater utilities. ILBANK will confirm that the process followed is in line with relevant Turkish laws and World Bank standards, mainly ESS5. ILBANK-PMU, will assist monitoring the processes of land acquisition and resettlement, noting when the process is out of compliance, and reporting to the Bank on progress made on regular basis.

Municipalities and municipal water and wastewater utilities will finance the land acquisition and resettlement from their own sources of financing.

12. Consultation & Participation

A key step in World Bank policies on resettlement, land acquisition and compensation is a framework for public consultation, participation, and the establishment of a process to redress the grievances of affected people.

Draft RF has been officially disclosed on the website of the ILBANK on November 27, 2019 in both English and Turkish. It will also be made available through the WB’s external website. This RF, together with ESMF and SEF, has also been consulted with relevant stakeholders on December 6, 2019 by ILBANK.

For the Public Consultation Meeting, the following institutions were invited:

1. Ministry of Environment and Urbanization, General Directorate of Environmental Impact Assessment, Permitting and Inspection
2. Ministry of Environment and Urbanization, General Directorate of Local Administrations
3. Ministry of Environment and Urbanization, General Directorate of National Estate
4. Union of Municipalities of Turkey
5. General Directorate of Adana Water and Wastewater Utility (ASKI)
6. Metropolitan Municipality of Kahramanmaraş
7. General Directorate of Kahramanmaraş Water and Wastewater Utility (KASKI)
8. General Directorate of Kayseri Water and Wastewater Utility (KASKI)
9. General Directorate of Konya Water and Wastewater Utility (KOSKI)
10. Osmaniye Municipality

11. General Directorate of Land Registry and Cadaster

In the Stakeholder Consultation Meeting, “Environmental and Social Management Framework (ESMF)” which has been prepared in line with ESS1 and Turkish Regulation and RF which has been prepared in line with WB ESS5 were discussed. At the end of the meeting, question and answer session was held. Participants list and minutes are prepared for the meeting and is presented in Annex 5.

During the preparation of the RPs at the municipality level, consultations will be held with project affected people to discuss the RF and/or the draft RP to ensure participation and that everyone’s opinions are taken into account. Consultation and participation will be held in an accessible and meaningful manner. RF and/or RPs will be disclosed before meetings for affected persons to view and discuss. Municipalities and/or ILBANK will respond to affected person’s questions in the consultation meetings. Consultation meetings, attendants and issues raised will be documented.

13. Monitoring

The purpose of monitoring will be to verify that:

- Actions and commitments described in the RP are implemented fully and on time
- Eligible affected people receive their full compensation entitlements within agreed time frames
- Complaints and grievances lodged by project affected people are followed up and that where necessary, appropriate corrective actions are implemented

Primary monitoring responsibility will rest with Municipality or Municipal Water and Wastewater Utility. For monitoring, administrations preparing RP will insert above-mentioned bullets into their reporting formats and they will send these Reports to ILBANK to be submitted to the Bank. Municipality or Municipal Water and Wastewater Utility has the responsibility to ensure that project implementation is fully consistent with the RF and also to provide for adequate monitoring and reporting of the activities set out in the RP.

ILBANK will monitor the processes of land acquisition and resettlement, noting when the process is out of compliance, and reporting to the Bank on progress made every six months in accordance with the reporting format in Annex 3. The Reporting Format in Annex 3 will also be used by Municipalities / Utilities to report to ILBANK on RP progress.

In addition, the World Bank will, as noted above, in its regular supervision missions also monitor the processes and if needed recommend mitigation measures to resolve any outstanding issues.

Annex 1. Outline for Resettlement Plan

1. Description of Project and Potential Impacts
2. Objective and Rationale for Preparing RP
3. Legal Framework
4. Survey of Affected Persons and Assets (baseline census, asset inventory and socioeconomic survey information)
5. Valuation, Compensation (specific compensation rates and standards)
6. Policy entitlements related to any additional impacts identified through the census or survey, Entitlement Matrix
7. Description of Resettlement Sites and Programs for Improvement or Restoration of livelihoods and Standards of Living, (*including Resettlement Implementation Plan –RIP- and Income Restoration Plan – IRP-*) – description of resettlement sites can be explained only should there be any physical displacement, otherwise the document will discuss livelihood restoration strategy if need be for economic displacement
8. Implementation Schedule for Resettlement Activities
9. Public Consultation and Disclosure Activities for RP
10. Institutional Responsibility of Implementation
11. Procedures for Grievance Redress
12. Monitoring and Implementation
13. Timetable and Budget with Detailed Cost Estimate

Annex 2. RP Progress Reporting Format

ILBANK will report to the Bank in every 6 months on the status of land acquisition and resettlement under the project. The sub-loan agreements between ILBANK and municipalities/ water and wastewater utilities will reflect that:

- Municipalities / Water and Wastewater Utilities will be responsible for resettlement and land acquisition as per Municipal Law (Law No. 5393), Expropriation Law (Law No. 2942) and Law concerning amendment to the Expropriation Law (Law No.4650), other relevant laws and ESS 5; and;
- ILBANK will monitor resettlement and acquisition under Expropriation Law (Law No. 2942) and Law concerning amendment to the Expropriation Law (Law No.4650), other relevant laws (such as Resettlement Law if applicable/implemented) and ESS 5.

A short report should be submitted to the Bank if there is any land acquisition or resettlement involved. The following format is used as the basis for the report. Each report should include for each case the number of consultations which took place with people, dates of the consultation and places where the consultation took place. The sample of the Reporting format below will be prepared by the Municipalities / Utilities to be submitted to ILBANK. After the review of ILBANK, the reporting format will be submitted to the Bank:

Improving Municipal Services in Refugee Affected Areas in Turkey Project

RP Progress Report

The cover of the Report should include date of preparation and the reporting period as (month) to (month) 20XX

1 - Sub-project Description

Brief description / overview of the sub-project, including: any associated or linked facilities needed for its functionality and success, including those linked facilities financed by other sources; key components; reports should up-date any changes or variations in design which may change land access requirements. *(This section remains relatively unchanged in the reports unless there is change in design).*

2 – Implementation Summary

The summary of all tasks and activities undertaken up to date on land acquisition and/or resettlement should be provided. Progress on issues such as negotiations for land, court cases, compensation payments, community engagement, site selection, physical relocation, livelihood restoration and grievances should be explained.

3 - Emerging Issues and Recommendations

This section should describe the key issues and report on its state of resolution / non-resolution.

4 –Follow-up on Previous Recommendations

This section will not exist for the first report as it will not have any follow up requirements from a previous period. As of the second report this section will provide information on key issues brought up in the previous report and measures taken to mitigate them. Any unresolved issue will once again be pointed out in this section.

5 – Conclusion

General progress of RP implementation will be evaluated and future actions in line with the recommendations will be discussed in this section.

6- Summary Tables for RP Implementation

In line with its monitoring indicators set out in the RP, this section will provide through several tables, both period specific and accumulated information on RP implementation. The tables can be provided separately in an excel worksheet or directly under this section depending on the content of information presented. *(An excel sheet with several tables have been provided as reference and can be adapted as necessary to each sub project.)*

Annex 3. Ex Post Social Audit Format

1. Information About Project	
Name & Location of Sub-project	
Project Cost	
Key Dates of Implementation	
Project Components & Land Requirements	

2. Entitlement Matrix				
Project Component	Project Impact	Category of Affected Person	Entitlement	Additional Provisions

3. Inventory of Land & Assets Acquired from Private Owners (Completely Volunteer Purchased) (Provided in Excel Sheet)	
3.1. Inventory of Land & Assets Acquired from Private Owners (Expropriation)	
Name of Owners/land user	
Project Component: Area(s) / plots(s) acquired (ha)	
Owner's/user's total land holding (ha); % taken for project	
Land use: pasture, agriculture, residence, etc.	
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	
Indicate if land was rented or informally used by another party	
Indicate if non-owner users had assets, trees, crops, etc. affected	
Indicate if land-based activity is significant source of income for owner or land user	
Compensation paid (add transaction fee)	

Dates delivered	
Impact on income of owner	

3.2 Inventory of Public, Community, or State Land Acquired	
Land parcels / plots acquired (ha)	
Land type / land use: Forest, commons for grazing, other	
Ownership: State, community, other. Structures or other fixed assets	
Compensation, land transfer, or other measures to mitigate impacts on land users. Specify measures and dates of delivery	

4. Consultations, Communications & Management of Grievances and Implementation Issues
<p><u>General Information About Project and Project Area:</u></p> <p><u>Consultations, Communications & Management of Grievances:</u></p> <p><u>Identification of Vulnerable PAPs:</u></p> <p><u>Pending issues (ownership issues, court or other processing, payment delays, other)</u></p>

5. Conclusion / Gaps identified and Mitigation Measures to Meet WB ESS5 Requirements

Annex 4. Sample Grievance Forms

Page 1 part must be shared in the project site and village/district headmen's office in order to collect written complaints from the locals. If the complaint is received via phone or verbally through meetings and visits to sponsor (either in its office or site) grievance form must be filled by the Community Liaison Officer (CLO) assigned by the sub-borrower.

If the complaint is received via mail or email, grievance form can be filled by the Community Liaison Officer (CLO) assigned by the sub-borrower, or the email print-out or mail can be attached to the close-out form. The complainant(s), at all times, will hold the right to remain anonymous while lodging a complaint, thus the Grievance Register Form may not always have complete information about the complainant.

Grievance Form

Reference No	
Name – Surname <i>The complainant shall hold the right to remain anonymous (Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information)</i>	
Please mark how you wish to be contacted	Please provide details for your preferred communication
E-mail	
Telephone	
Mail	
Other	
Province/Town/Settlement	
Date	
Category of the Grievance	
1. On assets/properties impacted by the project	
2. On infrastructure damages (roads , sewage system or water resources etc.)	
3. On decrease or complete loss of sources of income	
4. On environmental issues (ex. pollution)	
5. On employment process	
6. On traffic, transportation and other risks	
7. Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	

Signature:

Date:

Grievance Close Out Form

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIAL ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature of the
Complainant

Title-Name-Surname and Signature of the
Representative of the Responsible
Institution/Company

Date.../.../.....

Annex 5. Stakeholder Consultation Meeting Minutes and Attendance List

QUESTIONS AND ANSWERS:

INSTITUTION	QUESTION/COMMENT	ANSWER
General Directorate of Land Registry and Cadastre	<p>Have the new resettlement locations been determined on the land? If resettlement will take place, the locations should be registered. In this circumstance, expropriation is needed. By considering social impacts, unregistered public land should be identified and registered officially. Public institutions, which are responsible for registration, are General Directorate of National Estate and General Directorate of Land Registry and Cadastre.</p> <p>Predetermination of non-registered public areas/lands or lands which have not yet been surveyed and necessity of registration by virtue of General Directorate of National Estate and General Directorate of Land Registry and Cadastre have been mentioned.</p>	<p>It has been expressed that necessary registration processes are on-going; a considerable part has been completed. Moreover, it has been underlined that these issues will be pursued in “Resettlement Action Plans” by ILBANK.</p> <p>In order to clarify the resettlement issue, the representative of General Directorate of Land Registry and Cadastre has been informed at the end of the meeting that physical displacement has not been foreseen within the scope of this project.</p>
KASKİ	<p>The Expropriation Law in practice allows for majority of the international practices to be applied. Tough there are gaps that need to be bridged, major challenges are centred around the following three requests:</p> <ul style="list-style-type: none"> • Dissatisfaction of PAPs towards compensation fees of land. • PAPs who see expropriation as a last resort • PAPs who object to the value of land. <p>The most challenging problem is reported as illegal occupation of lands. These people have never reported to officials and have gained unfair income.</p>	<p>According to our expropriation legislation, no payment is made to informal users. However, WB requirements suggest paying compensation to locals who earn a livelihood from public land, even for non-legal use. Also, it has been mentioned that this application is not available in Expropriation Law but implemented in the BTC Project by a special law particularly for this project.</p> <p>WB Consultants have expressed that national law had been nearly harmonized with international requirements but there are still gaps to be considered such as compensation measures for informal users. One of the gaps is the replacement cost; while Turkish Law applies depreciation cost for structures, according to the WB ESSs, depreciation is not considered in the calculation of compensations.</p> <p>As municipalities stated that land expropriation payments are even five time higher than the real value, WB Consultants have remarked that these prices should be verified and documented in the official documents. The importance of documentation has also been emphasized. Moreover, it has been stated that payments for crops have also been made while assessing the value of land according to Turkish legislation but land to land compensation should also be considered to cash compensation.</p>
Municipalities	<p>Municipalities have remarked that local residents have planted trees and harvested crops in order to enhance price of their lands. In this case, they asked which actions can be taken?</p>	<p>WB Consultants have indicated the validity of “cut-off date” policy. Thus, they mentioned that any process on land will be in valid after this date.</p> <p>Experts of land registry and cadastre have mentioned that there have been some</p>

		<p>revisions on relevant regulations. However, there is no update on private lands. Moreover, WB Consultants have suggested that one of the solutions to this could be taking of the satellite image of the project area on the cut-off date as an evidence of existing structures on the lands to be expropriated</p>
<p>Kemal Şirikçi KASKİ (Kahramanmaraş)</p>	<p>The language of reports to be prepared was inquired.</p>	<p>It has been stated that the reporting to ILBANK should be in English. On the other hand, it has been mentioned that public announcements/information sharing, and public documents need to be made in Turkish-English-Arabic.</p>

PHOTOS:





TOPLANTI KATILIMCI TUTANAĞI					
Tarih:	6.12.2019				
Yer:	18.kat Toplantı Salonu				
Konu:	Paydaş Katılım Toplantısı				
No	Ad-Soyad	Kurum	Görev	Telefon	e-posta
1	ARZU URAZ YAVUZ	DÜNYA BANKASI	SOSYAL KALKINMA		
2	TUGRUL C. YILMAZ	" "	CEZAYE DANIŞMANI		
3	Ayfer KARAALP	ILBANK	Teknik Uzman		
4	Şevket Altuğ TAŞDEMİR	ILBANK	Daire Başkanı		
5	Gamze ASLAN	ILBANK	Müdür		
6	Sümeyle Gediloğlu	Türkiye Belediyeler Birliği	Sosyal / Proje Finans		
7	İbrahim AKGÜL	Genç ve Eski Bgl.	Gen. ve Eski Üye, Yerel Y. S. G. Üyesi		
8	Nelban Bıyıkçıoğlu	Türkiye Belediyeler Birliği	Uzman / Proje ve Finansman Br.		
9	Sena KURT	Milli Emlak Şiş. Md.	Harita Müh.		
10	Ayhan FİŞ	TKGM	Şube Md.		
11	H. Kemal TOKER	TKGM	Şiş. Md.		
12	Özgür AKKAYA	ILBANK	TEKNİK UZMAN		
13	Zahide PUĞAN	Kabranmese B. Bgl.	Genç Müh.		

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TOPLANTI KATILIMCI TUTANAĞI					
Tarih:	6.12.2019				
Yer:	18.kat Toplantı Salonu				
Konu:	Paydaş Katılım Toplantısı				
No	Ad-Soyad	Kurum	Görev	Telefon	e-posta
14	Kemal Sırıkci	Kahramanmaraş KASKİ	İns. meh		
15	Galip JOĞURT	Kahramanmaraş KASKİ	Plan. Proj. Şb. Md.		
16	Ömer Gürkan Neşec	Kayseri KASKİ	Şb. Md.		
17	Can Arınl	Adana ASKİ	Şb. Md.		
18	Gülizar EROĞLU	ILBANK	Uzman		
19	Taner BAŞAR	ILBANK	Teknik Uzman		
20	Sevil UYSAL	ILBANK	Teknik Uzman		
21					
22					
23					
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26					

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görev
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